

## RECENT DEVELOPMENTS IN AI LEGISLATION IN THE EU AND TÜRKİYE

On 12 July 2024, after years of consultation, drafting and negotiation, the EU Artificial Intelligence Act (Regulation EU (2024/1689)) (the “**EU AI Act**”) was officially published in the EU’s Official Journal. This landmark is the first of its kind, setting a precedent for future AI related laws in many countries, including Türkiye.

### Timeline and imminent impact

The EU AI Act will enter into force on 1 August 2024, with initial set of requirements becoming applicable from 2 February 2025.



**2 February'25**

Prohibitions,  
literacy



**2 August'25**

General -purpose  
AI, Member  
States' rules on  
penalties



**2 August'26**

Standalone high-risk AI  
(e.g. HR, credit scoring,  
insurance risk etc.),  
transparency  
requirements, regulatory  
sandboxes



**2 August'27**

Specific high-risk  
AI, GPAI models  
on the market

The provisions on penalties and fines will be enforceable later, even though the penalty prohibitions take effect on 2 February 2025. By 2 August 2025, requirements will be implemented for providers of general-purpose AI (“GPAI”) models, which are capable of performing a wide range of tasks in multiple domains and contexts. However, associated fines will not start until a year later.

### Global Reach and Broad application

The EU AI Act has a broad scope, covering issues such as the placing on the market, putting into service and use of AI across various sectors on a horizontal basis, where the AI systems have the capability to infer, run on machines and have some degree of independence.

Similar to the GDPR, the EU AI Act is extraterritorial, meaning it can apply to businesses outside of the EU if their operations affect the EU market.

The EU AI Act applies across sectors and covers the entire AI value chain, including providers, deployers, importers and distributors. It also considers sector-specific aspects introducing certain exclusions or exemptions such as longer transition periods and cross-compliance options (i.e. where compliance with sector-specific requirements fulfils compliance under the EU AI Act).

## Risk adjusted but strongly enforced

The EU AI Act employs a tiered approach to compliance requirements based on AI risk levels, ranging from prohibitions to, high-risk categories, GPAI and GenAI. Penalties can range between 1% and 7% of an undertaking's total worldwide turnover. The EU AI Act will be enforced by national authorities of the EU Member States and new EU-level bodies, including the AI Office under the European Commission. The EU AI Act also considers the positions of SMEs offering a penalty scheme of the lower of relevant percentage or amount (e.g. lower of EUR 15,000,000 and 3% of worldwide turnover). Together with regulatory sandboxes, which plays a crucial role in the EU AI Act, the EU aims to foster its AI ecosystem.

## Initial steps in Türkiye

On 25 June 2024, a draft law on AI regulation was submitted to the Turkish parliament. While the draft law is currently less comprehensive when compared to the EU AI Act, any initial legislation expected to evolve into a more detailed regulatory framework in the coming years, aligning with the developments in the EU.

## Conclusion

The EU AI Act marks a significant step in AI regulation, setting a high standard for future legislation worldwide. As Türkiye begins its journey in AI regulation, it will likely draw inspiration from the EU's comprehensive approach, ensuring a robust and forward-thinking framework for AI governance.

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