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WHITEPAPER

Operationalizing the EU AI Act Cutover

A practicalguidetostaged readiness, GPAIevidence,high-riskAIcontrols and audit-ready governance.

Updated May 2026 | Regulatory status reviewed: 6 May 2026 | Practical governance note - not legal advice

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A practicalguide to staged readiness: what is already in force, what arrives in 2026 and beyond, and how to build audit-ready evidence without slowing down responsible AI adoption.

What you will learn

- What is already in force in 2025 vs. what arrives in 2026 and beyond
- How to treat Digital Omnibus uncertainty without pausing readiness work
- How to prepare for GPAI obligations, including model/vendor evidence and transitional grace periods
- What high-risk readiness requires in practice: QMS, risk management, data governance, human oversight, FRIA, EU database registration and post-market monitoring
- How to create transparent, exportable evidence for AI workflows

Executive Summary

The EU AI Act applies in stages. By 2025, organizations had to address prohibited practices, AI literacy and the first wave of general-purpose AI governance. In 2026, the operational burden becomes more visible: transparency rules, broader enforcement and readiness expectations for high-risk AI systems move from preparation to execution.

For most companies, the hard part is not reading the regulation. The hard part is proving - later - that the right decisions were made at the right time, by the right people, using the right evidence. This is where AI governance becomes an operating model rather than a compliance memo.

As of this edition, the Digital Omnibus remains an active legislative development. Unless and until adopted, the enacted AI Act timeline remains the baseline. The prudent approach is to keep preparing durable governance foundations: inventory, classification, supplier/model evidence, transparency records, human oversight, incident handling and monitoring.

- **Staged timelines need staged evidence.** Policy, inventory, risk classification, supplier documentation, human oversight and monitoring records should mature before deadlines arrive.
- **GPAI readiness is not only a provider problem.** Deployers and downstream builders still need model/vendor evidence, usage boundaries, transparency artifacts and dependency traceability.
- **High-risk readiness is an operating system.** QMS, risk management, data governance, technical documentation, logging, human oversight, FRIA, EU database registration and post-market monitoring need clear ownership.
- **Audit readiness is created during operations.** Reconstructing evidence after a customer, board or authority asks for it is slower and less credible.

About this document

This whitepaper was prepared by Sentravera as a practical governance guide. It is not legal advice. It reflects the regulatory position reviewed on 6 May 2026 and should be validated against final legal texts, standards, regulator guidance and qualified counsel before operational reliance.

1. The Staged Cutover: What Changes When

The practical leadership question is not only "what is the deadline?" but "what evidence must exist before that deadline arrives?"

Date	What changes	Operational implication
1 Aug 2024	AI Act enters into force	Regulatory clock starts. Begin mapping AI systems, ownership and risk exposure.
2 Feb 2025	Prohibited practices and AI literacy obligations apply	Clear usage policies, staff awareness and controls against unacceptable-risk use cases are required.
2 Aug 2025	GPAI obligations and governance rules apply	GPAI providers face transparency, copyright and documentation duties. Downstream teams need supplier/model evidence. Pre-market GPAI models have transition until 2 Aug 2027.
2 Aug 2026	Majority of rules apply under enacted AI Act timeline	High-risk readiness for Annex III systems and Article 50 transparency obligations become operational unless formally amended.
2 Dec 2027 / 2 Aug 2028	Potential deferred dates under Digital Omnibus discussions	Current proposals would defer selected high-risk obligations. Treat this as active legislative uncertainty, not a reason to pause readiness.
2 Aug 2027	Embedded high-risk product systems transition under enacted Act; GPAI grace period ends	Product-regulated environments and older GPAI model dependencies need conformity and evidence alignment.

Digital Omnibus planning note - active legislative development

At the time of this edition,EU institutions are considering targeted amendments that may defer selected high-risk AI obligations. Unless and until those amendments are adopted, the original AI Act timeline remains the legal baseline. Recommendation: continue preparing against the enacted timeline while tracking final legislative outcomes.

2. The 2025 Operating Baseline: Already in Force

AI literacy and prohibited practices

From February 2025, companies should be able to show that AI use is not unmanaged experimentation. A practical baseline includes an AI usage policy, role-aware training evidence and a control process to prevent unacceptable-risk uses from entering production.

- Define who may approve AI use cases and who owns the risk assessment.
- Keep a live inventory of AI systems, pilots and material third-party AI dependencies.
- Train employees on permitted use, escalation paths and boundaries of automated decision-making.
- Screen new AI workflows for prohibited-practices risk before launch.

GPAI obligations and downstream dependence

From August 2025, GPAI rules became central to the operating model. The primary legal obligations affect providers of general-purpose AI models, but downstream organizations still need a practical way to collect and manage supplier evidence.

- Model or supplier documentation relevant to the intended use.
- Transparency information required by downstream AI-system builders.
- Copyright policy evidence and public summaries of training content where applicable.
- Systemic-risk documentation where a model is in scope.
- Grace-period status for each GPAI model dependency.

3. Preparing for GPAI Obligations

Documentation

GPAI readiness should be treated as a supplier and model governance workflow. Even when the organization is not the GPAI model provider, it may need documentation to support its own risk assessment, procurement controls, customer commitments and AI Act readiness.

- Maintain a model/vendor register: provider, model name, version, use case, data flow, integration owner, contractual basis and compliance deadline.
- Store provider documentation in a versioned evidence pack rather than scattered links or email threads.
- Record decisions about suitability, limitations, fallback procedures and approved use boundaries.

Transparency and copyright

- Capture whether the model provider offers transparency information needed by downstream providers.
- Track whether copyright-policy evidence and training-content summaries are available where applicable.
- Map generative AI output disclosures or labelling requirements to product and publishing workflows.

Incident readiness

- Define what counts as an AI incident, serious incident, malfunction, harmful output or control failure.
- Create an intake path for users, business owners, legal/compliance and technical teams.
- Connect incidents to model version, workflow, data source, reviewer, corrective action and notification analysis.

Practical control question

Can your team identify which AI workflows depend on which GPAI model, vendor, version, prompt layer, retrieval source or fine-tuning dataset - and can you export that evidence when asked?

4. Operationalizing High-Risk AI Readiness

High-risk readiness is not a single document. It is a controlled operating system around the AI lifecycle. The organization must be able to demonstrate that risks were identified, reduced, monitored and governed through repeatable controls.

Quality Management System Defined responsibilities, approved procedures, change control, supplier controls and documented compliance activities.	**Risk Management** Risk identification, evaluation, mitigation, residual-risk acceptance and review cadence across the lifecycle.
Data Governance Training, validation, testing and operational data controls; provenance, relevance, quality and bias considerations.	**Technical Documentation** System purpose, design, model dependency, performance assumptions, limitations, logs and deployment context.

Human Oversight Named human roles, override/stop/escalation paths, interface clarity and evidence that oversight is meaningful rather than nominal.	**Post-Market Monitoring** Ongoing monitoring plan, incident thresholds, feedback loops, corrective actions and version-aware evidence.
FRIA Fundamental Rights Impact Assessment where deployer obligations apply; completed before deployment and connected to mitigation and oversight records.	**EU Database Registration** Registration ownership and evidence for high-risk systems where required before placing on the market or putting into service.

Common failure mode

Many teams build the right control on paper but fail to attach it to the live workflow. Audit readiness requires operational traceability: who approved, what evidence they saw, what changed and what monitoring happened afterward.

5. Article 50 Transparency Obligations

Article50transparencyrequirementsshould bebuiltinto product, service and publishing workflows - not bolted on afterward.

- **Interaction disclosure.** Users should be informed when they are interacting directly with an AI system, unless the AI nature is obvious from context.
- **Deepfake and synthetic media labelling.** Outputs that generate or manipulate image, audio or video content may require machine-readable marking and clear labelling; AI-generated public-interest text may also require labelling.
- **Emotion recognition and biometric categorisation.** Individuals must be informed of exposure and purpose where these systems are used.

Operationalimplication

Assign product ownership for each disclosure requirement before go-live. Legal text alone is not enough; the disclosure must appear in the user journey, content pipeline or publication workflow where the risk occurs.

6. Building Audit-Ready Evidence

Audit-ready evidence isnota folder. It is a chainofrecords that explains the lifecycle of an AI decision or system: intention, classification, review, approval,deployment,monitoring and correction.

- **System record** Purpose, owner, risk classification, users, model dependencies, data sources, deployment context and GPAI grace-period status.
- **Decision record** Review date, reviewer, rationale, alternatives considered, risks accepted, approval status and follow-up actions.
- **Control record** Policy checkpoints, human oversight gates, validation tests, security/privacy review, FRIA completion and supplier review.
- **Monitoring record** Performance signals, incidents, user feedback, drift/quality review and corrective actions.
- **Transparency record** Article 50 disclosures implemented, deepfake labelling status, chatbot disclosure tested and EU database registration reference.
- **Export record** Evidence pack generated for internal audit, customer due diligence, board review or regulator request.

The goal is not to document everything. The goal is to document the things that prove the system was governed - as decisions are made, not after a regulator has asked.

7. SME Provisions and Regulatory Sandboxes

The AI Act includes support measures that may matter for SMEs and startups.These should be tracked as part of readiness planning rather thantreated as an afterthought.

- Simplified compliance pathways or templates may apply to certain documentation obligations.
- AI regulatory sandboxes are intended to provide controlled testing environments under regulatory supervision.
- Real-world testing provisions may be relevant for qualifying organizations.
- SMEs and startups may receive priority or discounted access to certain support measures.

Practical next step for SMEs

Assignownershipformonitoring sandbox availability in relevant Member States and assessing whether simplified documentation pathways apply to candidate high-risk systems.

8. Where Sentravera Fits

Vendorcontext

This section describes Sentravera's intended operating role. It is included to show how the governance pattern can be operationalized; it should not be read as independent legal guidance.

Sentravera is being developed as an operational governance layer for AI workflows, evidence capture and readiness execution. It is designed to sit alongside existing AI, data, legal, security and product workflows - not replace them.

The strategic value is controlled execution: ensuring evidence is captured when decisions are made, connected to the workflow that produced it and exportable when leadership, customers, auditors or regulators ask for proof.

- AI system inventory and use-case context organized around ownership, risk and dependency records.
- Decision records that connect risk classification, reviewer rationale, approvals and evidence attachments.
- Workflow checkpoints for human oversight, policy acceptance, supplier review and escalation.
- Monitoring and incident evidence connected to system version, workflow, owner and corrective action.
- Exportable readiness packs for leadership, customer assurance and audit preparation.

The initial focus is the highest-friction evidence gap: inventory, approvals, GPAI dependency records, high-risk readiness, Article 50 transparency tracking and incident traceability - without forcing an organization to redesign every AI process on day one.

9. A 90-Day Readiness Plan

Window	Objective	Expected output
Weeks 1-2	**Baseline**	AI inventory created; ownership model defined; systems classified; GPAI ependencies and grace-period status noted.
Weeks 3-4	**Policy and literacy**	Acceptable-use policy updated; prohibited-practices guardrails in place; AI literacy evidence captured.
Weeks 5-7	**Evidence model**	Required records defined: risk decisions, data provenance, approvals, test results, model/vendor documentation, incident logs and FRIA scope assessment.
Weeks 8-10	**Workflow controls**	Human oversight gates added; change-control triggers set; issue intake active; Article 50 transparency mechanisms mapped; EU database registration scoped.
Weeks 11-12	**Audit rehearsal**	One simulated audit run using a real AI workflow; evidence pack exported and gaps logged.

10. EU AI Act Readiness Evidence Checklist

	Minimum evidence	Practical test	Status
Inventory	AI system register with owner, purpose, users, supplier/model dependency, risk classification and GPAI grace-period status.	Named businessowner and review cadence.	Notstarted / In progress / Ready
Policy	Acceptable use, prohibited-practices guardrails, human escalation procedures and incident intake process.	Policy acknowledged by users and mapped to workflow controls.	Not started / In progress / Ready
GPAI	Supplier/model documentation, copyright-policy evidence, training-data summary links, downstream transparency information and grace-period tracking.	Evidence pack per model or vendor relationship.	Not started / In progress / Ready
High-risk	QMS, risk management file, data governance, technical documentation, logs, human oversight and accuracy/robustness/security controls.	Readiness pack per high-risk or candidate high-risk system.	Not started / In progress / Ready
FRIA	Fundamental Rights Impact Assessment where required for deployers of high-risk systems.	Assessment completed and documented before deployment.	Not started / In progress / Ready
EU Database	Registration evidence for relevant high-risk AI systems before placing on market or putting into service.	Registration record and ownership assigned.	Not started / In progress / Ready
Article 50 Transparency	AI interaction labels, deepfake labelling, AI-generated content marking, emotion recognition and biometric categorisation notices.	Disclosure mechanisms live in affected user workflows.	Not started / In progress / Ready
Monitoring	Post-market monitoring plan, incident thresholds, corrective action log and deployer feedback loop.	Operational incident and change-control process active.	Not started / In progress / Ready
Evidence	Decision records, approvals, test results, data lineage, model/version history, risk acceptance and reviewer notes.	Audit trail exportable without reconstructing history.	Not started / In progress / Ready

Closing Note

The EUAI Actcutover should be treated as a governance transformation, not a deadline exercise. The organizations that will move fastestarenot those with the longest policy documents. They are those that can prove their AI systems are understood, controlled, monitored and explainable through operational evidence.

Regulatory uncertainty makes durable governance foundations more valuable, not less. Inventory, classification, ownership, supplier/model evidence, transparency records and monitoring traces remain useful regardless of which specific high-riskdeadlineisfinally confirmed.

Reference Points Monitored for This Edition

Official EU sources

- European Commission - AI Act policy page and application timeline: https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai
- European Commission - Navigating the AI Act FAQ: https://digital-strategy.ec.europa.eu/en/faqs/navigating-ai-act
- European Commission - Guidelines for providers of general-purpose AI models: https://digital-strategy.ec.europa.eu/en/policies/guidelines-gpai-providers
- European Commission - AI Act standardisation: https://digital-strategy.ec.europa.eu/en/policies/ai-act-standardisation
- Council of the EU - Council position on streamlining AI rules, 13 March 2026: https://www.consilium.europa.eu/en/press/press-releases/2026/03/13/council-agrees-position-to-streamline-rules-on-artificial-intelligence/

Legislative and legal commentary

- European Parliament Legislative Train - Digital Omnibus on AI: https://www.europarl.europa.eu/legislative-train/package-digital-package/file-digital-omnibus-on-ai
- DLA Piper GENIE - The Digital AI Omnibus: Proposed deferral of high-risk AI obligations, April 2026.
- IAPP - AI Act Omnibus: what just happened and what comes next, 2026.

Disclaimer

Thiswhitepaper is a practical governance guide, not legal advice. Organizations should confirm legal obligations with qualified counsel and monitor final guidance, standards and amendments adopted through the EU legislative process. Regulatory status reviewed: 6 May 2026.

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