

# One portfolio. Several legal clocks.

The jurisdiction benchmark should not be read as a ranking of legal quality. It shows how consequential AI appears in different evidence environments while regulatory obligations, implementation dates and public expectations move on different clocks.

| BB                             | CCC            | NOW                               | 2027-28                  |
|--------------------------------|----------------|-----------------------------------|--------------------------|
| North America / United Kingdom | European Union | EU transparency obligations apply | high-risk rules phase in |

## Published group positions

North America and the United Kingdom are rated BB in the first jurisdiction comparison; Oceania is rated B; the European Union CCC; Latin America and Sub-Saharan Africa CC; East Asia and South & Southeast Asia C. Smaller groups should be read cautiously as observed first-release positions.

## The business problem is asynchronous governance

The EU AI Act became broadly applicable in August 2026, with transparency duties now live and high-risk obligations phased into 2027 and 2028. The UK uses a mandatory public-sector transparency standard. US federal policy emphasises AI use and acquisition through a different governance architecture. OECD work is pushing toward interoperable incident reporting.

## What needs to travel

A multinational does not need identical laws. It needs an evidence record that can be interrogated by different laws without being rebuilt each time. The scarce capability is linking system, use case, model version, supplier, affected population, jurisdiction and decision owner in one coherent chronology.

## Decision question

If a rule, supervisory interpretation or public-sector procurement requirement changes tomorrow, can the organisation identify every affected deployment quickly enough to act while the remedy is still internal?

Official context: [European Commission AI Act timeline](#) | [EU AI Act transparency enforcement](#) | [UK ATRS](#) | [White House OMB memoranda](#) | [OECD incident framework](#) | [Council of Europe Treaty 225](#)

Technical note: RATE AI ratings are independent risk-intelligence positions, not legal opinions or certificates of regulatory compliance. Detailed scoring and evidence rules are published separately in the Public White Paper v1.1.