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## Urgent Concerns: Implementation Challenges in EU AI Act Standards Development

As key stakeholders in Europe's AI ecosystem, we write to address critical concerns regarding the current development of the EU AI Act standards. While we fully support the Act's objectives, our practical experience with recent standardization efforts has revealed several immediate challenges.

### Critical Implementation Challenges

The current approach to AI standards development risks creating unintended barriers to innovation and market growth. We observe standards becoming increasingly prescriptive and complex, imposing significant operational burdens through extensive documentation requirements, excessive audits, multiple certification processes, and the need for specialized compliance personnel. These requirements disproportionately affect SMEs and startups, potentially limiting Europe's AI innovation capacity.

Of particular concern is the growing divergence between European and international standards. This misalignment creates unnecessary obstacles for European companies operating globally, requiring duplicate certification processes and increasing compliance costs. In rapidly evolving areas such as AI, blockchain, and advanced robotics, overly rigid specifications risk becoming obsolete before they are implemented.

### International Alignment Imperative

Recent developments in global AI governance, particularly the G7 consensus, demonstrate that international alignment is both achievable and essential. The WTO Technical Barriers to Trade Agreement already provides a clear framework that directs members to use international standards as the basis for their technical regulations. Creating separate and isolated regional standards now would not only undermine this progress but also potentially violate international trade commitments. Moreover, given AI's inherently cross-border nature, unified global standards provide the predictability that companies need to focus on innovation rather than navigating fragmented requirements. This predictability is crucial for European businesses' ability to adopt AI to strengthen operational efficiency and sustain market position.

### Practical Solutions for Effective Standards

We propose a more balanced approach that maintains high-quality standards while ensuring practical implementability:

- First, standards must prioritize international alignment to ensure European companies remain competitive in global markets. Second, they should focus on performance-based requirements and outcomes rather than prescribing specific processes or how to achieve outcomes. Third, horizontal

standards applicable across various vertical domains would significantly reduce fragmentation and compliance complexity.

- Most importantly, we advocate for a scalable, risk-based approach that accommodates businesses of all sizes. This includes streamlining conformity assessment procedures and embracing technological neutrality to allow for innovation.

## Way Forward

The industry is ready to contribute its practical expertise to develop standards that effectively serve regulatory and innovation objectives. We aim to ensure EU AI standards become a model for balancing robust protection with practical implementation, supporting Europe's position as a global business leader.

This legal and procedural clarity is essential to avoid regulatory limbo, ensure business continuity, and maintain trust in the conformity assessment system.

In light of these challenges, we join the recently expressed views at the European level regarding the need to postpone enforcing certain parts of the AI Act until the necessary technical standards created by the European Standard Organisation and compliance tools are ready. This approach would ensure effective and meaningful implementation of the regulation.

We request an urgent dialogue to address these concerns and work toward solutions that serve all stakeholders while maintaining Europe's competitive edge in AI development.



