

EU AI Act vs UK Pro-Innovation Approach to AI Regulation (White Paper)

Editorial verdict: **asymmetric** — see comparison narrative below.

EU · BINDING REGULATION

EU AI Act

EU-AIA-2024

TREATMENT OF FOUNDATION MODELS / GPAI

governs

Arts. 51-55 (general-purpose AI + systemic risk)

Primary source: [Regulation \(EU\) 2024/1689](#)

UK · POLICY STATEMENT

UK Pro-Innovation Approach to AI Regulation (White Paper)

UK-WHITEPAPER-2023

TREATMENT OF FOUNDATION MODELS / GPAI

implicit

Cross-cutting principles; sector regulators apply

Primary source: [CP 815 \(2023\)](#)

What this comparison shows

One regime addresses the topic explicitly while the other covers it only implicitly or not at all. This is a likely site of regulatory arbitrage and a candidate for comparative-law follow-up.

Contested question: Does the foundation-model category map to a coherent capability tier, or is it a regulatory convenience? Compute-threshold vs behavioural-threshold debate is unresolved across EU/US/China.

Bibliography

1. [Regulation \(EU\) 2024/1689](#) — EU AI Act.
2. [CP 815 \(2023\)](#) — UK Pro-Innovation Approach to AI Regulation (White Paper).
3. [Policy Window — Foundation Models / GPAI](#) (cross-jurisdiction topic article with full coverage matrix).