ODA3 INSTITUTE

CROSSWALK — INFORMATIVE

GAISSF–EU AI Act Mapping

Website and Executive Summary

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What GAISSF-CRO-027 provides

A structured article-level crosswalk between all 59 GAISSF™ v1.0 controls and 51 selected material provisions of Regulation (EU) 2024/1689, using the consolidated text of 27 July 2026 incorporating Regulation (EU) 2026/1744. It contains 236 forward mapping records and reverse article coverage for regulatory readiness planning.

Designed for

CISOs, AI governance leads, compliance officers, security architects, legal and risk teams, internal audit, assessors and standards participants.

Key uses

- Identify GAISSF evidence that may support EU AI Act implementation.
- Find legal and procedural gaps beyond technical controls.
- Separate provider, deployer, supply-chain and GPAI obligations.
- Track phased applicability, including the 2026 Digital Omnibus amendments and revised high-risk application dates.

Important boundary

GAISSF-CRO-027 is an informative implementation crosswalk. It is not legal advice, legal equivalence, a conformity assessment, CE-marking evidence, regulatory approval, a presumption of conformity, certification credit, evidence-sufficiency determination or operating-effectiveness assessment. GAISSF certification is not currently offered. D9 is conditional where Physical AI or cyber-physical actuation is in scope; PAI-SF™ / CSX-PAISF-004 remain mapping/context only.

Digital Omnibus scope: Article 2 now contains sectoral-law rules for Article 6(1) product systems and future Article 2(13) delegated acts can limit specified requirements for some Annex I Section A systems. New Article 4a, Article 60a and Articles 75a-75d, amended Article 75, Article 42(3), and Article 101 are current legal dependencies but are not separately mapped in this v1.0 crosswalk.

Article 99: Chapter XII applies from 2 August 2025, while the underlying duty being enforced must itself be applicable. Current maxima include EUR 35 million/7%, EUR 15 million/3%, and EUR 7.5 million/1%, with SME/SMC qualifications and case-specific enforcement criteria.

Article 73: immediate reporting subject to statutory triggers; outer limits are 15 days ordinarily, 2 days for widespread infringement or Article 3(49)(b) incidents, and 10 days for death. Article 74(1a) may route reporting to the AI Office for systems under its competence.

Additional legal changes captured: Article 6(1a)-(1c) classification refinements; simplified Article 11 documentation and proportionate Article 17 QMS rules for SMEs/SMCs; amended Article 43(3) conformity-assessment route including the 28 January 2028 designation deadline; Article 72 post-market-monitoring-plan guidance due by 2 September 2027; and amended Article 95 SMC treatment.

Package contents

Publication PDF, detailed XLSX register, website summary and machine-readable JSON dataset.

Source baseline

Regulation (EU) 2024/1689, consolidated 27 July 2026, incorporating Regulation (EU) 2026/1744 (Digital Omnibus on AI); verified 6 October 2026 against EUR-Lex and European Commission implementation/enforcement material. Chapters I-II generally apply from 2 February 2025; Chapter V, Chapter VII, Chapter XII (except Article 101), Chapter III Section 4 and Article 78 from 2 August 2025; the general application date is 2 August 2026; Annex III high-risk Chapter III Sections 1-3 from 2 December 2027; Annex I high-risk Chapter III Sections 1-3 from 2 August 2028.