AI REGULATION: THE EU AND CHINA APPROACH

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AI regulation: the EU and China approach
Artificial intelligence has rapidly affected all areas of our lives, so it was necessary to start thinking about its regulation. However, different states have adopted various approaches to this regulation so that specific differences can be perceived between them. In 2023, China adopted a regulation on generative artificial intelligence, and in early 2024, the EU approved the first comprehensive act regulating artificial intelligence; China and the EU can be considered "leaders" in artificial intelligence regulation. Accordingly, the article analyzes strategies and approaches to regulation in the EU and China and assesses their key differences and similarities based on the above analysis.

Key words: Artificial Intelligence. Regulation. EU. China

Introduction

In recent years, the issue of artificial intelligence has become a phenomenon, not only in the field of technology but also in the sphere of regulations. With its rapid development and subsequent expansion, which made it available to everyone, we already encounter its use in almost all areas of our lives. While, on the one hand, various AI applications enjoy great popularity, their use can present certain risks, which has raised concerns regarding ethics, security and privacy in

particular. In response to the above, the regulation of this technology has therefore started to be considered, which would establish certain principles, standards or restrictions regarding the use of AI. Currently, several countries are preparing their regulation of AI. Probably, the most discussed regulation is undoubtedly the EU AI Act, which (*seems*) to be in the "final" point and represents the world's first comprehensive regulation of AI. For completeness, however, China came up with a partial regulation of artificial intelligence in June 2023, which has already been effective since August 2023,[1] but we cannot say such a complex legal arrangement exists as in the EU AI Act. Within this regulatory "*storm*", individual and partial efforts to regulate these systems cannot be neglected. In this article, we will focus on analyzing and drawing partial comparisons between the approaches of the EU and China. These two major economic and technological powers are focused on solving the challenges associated with AI, but their approaches differ in fundamental aspects. In its regulations, the European Union emphasizes the need for ethical and transparent use of AI, especially with an emphasis on protecting privacy and consumer rights; China is trying to develop a strong AI technology industry with minimal interference in the freedom of innovation. This article compares these two approaches to AI regulation and their possible impact on society or other regulations. Based on this comparison, we will further outline the key differences in approach and their possible implications for the future development of artificial intelligence. The rapid development of generative artificial intelligence models has caused concerns about potential risks, leading to worldwide debates about their (non-)regulation. Based on the above, China has been mainly focused on regulating generative artificial intelligence. This article also analyses and compares the specific regulations for generative artificial intelligence in the EU and China. Given the general approaches to AI regulation in these jurisdictions, Chinese regulation is expected to emphasize state control and oversight, while EU regulation will prioritize protecting individual rights, including intellectual property rights, and the maintenance of ethical standards.

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[1] See more: China says generative AI rules to apply only to products for the public [online]. Available at: https://www.reuters.com/technology/china-issues-temporary-rules-generative-ai-services-2023-07-13/

1. AI regulation in the European Union

As we already indicated in the introduction, given that the first comprehensive regulation of artificial intelligence was approved at the beginning of 2024, the EU has thus become a leader in regulation of this technology. Since this process lasted several years, it was demanding and included lengthy negotiations, discussions, and disagreements. The first initiative came from the European Commission in 2020 when a White Paper on AI was published, which served as the first step towards preparing AI regulation.[2] Subsequently, in 2021, the European Commission came up with the first draft for comprehensive regulation of AI. The main aim of the European strategy was to create a regulatory framework for AI systems within the EU and to make AI systems *human-centred* and *trustworthy*. The intention was also to mitigate potential dangers while promoting entrepreneurship and innovation in artificial intelligence.[3] The adoption of this act was rather complicated. The initial proposal had several shortcomings and comments, and there was also a threat that its final form would be approved much later due to pressures and disagreements regarding the regulation of generative artificial intelligence.[4]

The EU's approved act already demonstrates a preference for a "*horizontal*" approach to this regulation. It will focus from the beginning on creating a single comprehensive act to regulate all AI systems.[5] This act takes a risk-based approach and, also sets rules for general-purpose AI models. Since this act is based on different risk categories, each has its obligations. Some systems that could pose a threat for society or individuals are prohibited. High-risk systems have the highest set of obligations and must be assessed before being placed on the market. Systems with limited risk have slightly fewer

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[2] GLAUNER, P. An Assessment of the AI Regulation Proposed by the European Commission. 2022. [online]. Available at: https://www.researchgate.net/publication/351885218_An_Assessment_of_the_AI_Regulation_Proposed_by_the_European_Commission

[3] FELDSTEIN, S. Evaluating Europe's push to enact AI regulations: how will this influence global norms?, In: Democratization. 2023, p. 13 [online]. Available at: https://www.tandfonline.com/doi/full/10.1080/13510347.2023.2196068?scroll=top&needAccess=true

[4] See more: MUKHERJEE, S. Generative AI a stumbling block in EU legislation talks -sources. [online]. Available at: https://www.reuters.com/technology/generative-ai-stumbling-block-eu-legislation-talks-sources-2023-12-01/

[5] HUW, R. et al. Governing artificial intelligence in China and the European Union: Comparing aims and promoting ethical outcomes. In: The InformaTIon SocIeTy2023, VoL. 39, no. 2, pp. 79–97 [online]. Available at: https://www.tandfonline.com/doi/epdf/10.1080/01972243.2022.2124565?needAccess=true

obligations; they should primarily meet minimum requirements for transparency that would allow users to make informed decisions. According to the act, systems that pose minimal or no risk can be used without restrictions or additional obligations. Apart from this primary division, the act regulates general-purpose and generative AI systems, which must meet specified requirements for transparency and disclosure about the data used for training. [6] The issue of generative artificial intelligence is discussed in more detail in the next part of this article. It is also important to mention that the EU AI Act intends to establish certain boundaries by establishing regulatory frameworks and supporting research and development. This fact in the act represents the creation of the so-called "*regulatory sandboxes*" to support innovation across the EU. In terms of this act, all member states are expected to create or join such centres. These centres will enable providers and deployers of these systems to voluntarily experiment, test, train and verify their systems under regulatory supervision before putting them on the market.[7] The establishment of the EU Office for Artificial Intelligence is no less critical. Its functions will also be to support the development of practice for implementing obligations related to the act.

It should also not be forgotten that this regulation will also have a *de jure Brussels Effect* as it was, for example, in the case of the GDPR[8], because will probably significantly impact other regulations, either worldwide or within national initiatives.[9] In addition to regulatory efforts at the European Union level, Germany, France, and Italy, for example, have launched their national strategies focused on AI.

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[6] *Ibid.*

[7] Political agreement reached on the EU Artificial Intelligence Act. 2023. p. 13 [online]. Available at: https://assets.ey.com/content/dam/ey-sites/ey-com/en_gl/topics/ai/ey-eu-ai-act-political-agreement-overview-10-december-2023.pdf

[8] GUNST, S., and DE VILLE, F. The Brussels Effect: How the GDPR Conquered Silicon Valley. European Foreign Affairs Review. 2021. Vol. 26. Issue 3, pp. 437-458. [online]. Availableat:https://kluwerlawonline.com/journalarticle/European+Foreign+Affairs+Review/2 6.3/EERR2021036

[9] ALMADA, M., and RADU, A. The Brussels Side-Effect: How the AI Act Can Reduce the Global Reach of EU Policy. German Law Journal, 2024. pp. 1–18. [online]. Available at: https://www.cambridge.org/core/services/aop-cambridge-core/content/view/032C72AEC537EBB6AE96C0FD90387E3E/S2071832223001086a.pdf/th e-brussels-side-effect-how-the-ai-act-can-reduce-the-global-reach-of-eu-policy.pdf

2. AI regulation in China

China, as a global technological player, has a significant role in the development of AI, but its approach to regulating this technology differs from that of western countries. In response to global competition in the development and use of AI, in 2017, China introduced the *China's 'New Generation Artificial Intelligence Development Plan'*. This plan expresses a strategy aimed at socio-economic development and the creation of a billions-dollar artificial intelligence industry, which would make China by 2030 become the world leader in the field of AI.[10] After the release of this strategy in 2020, China ranked first in the number of AI research studies and the number of AI-related patents. Following this, it began to focus on the regulation of this technology. In general, this period can be divided into phases. The first phase was the strategic planning. It was followed by the beginning of regulatory supervision, mainly characterized by adopting specific non-binding standards in AI. Currently, the phase is direct supervision of technologies. The current phase differs from the previous one in that the regulations adopted significantly affected the management of AI in China.[11]As for the approach to regulations itself, as we already mentioned, China's approach is characterized by an emphasis on the support of innovation and ensuring control over technology by the state.[12] They preferred adopting a comprehensive law to specific regulations focused on specific technologies.

Even though the EU has become the leader in the case of complex legislation related to AI, the lead in introducing specific laws for relegating AI belongs to China.[13] In the next part of this chapter, we will briefly address the adopted laws and their essential purpose. The common aim and intent of these Chinese regulations is to address AI-

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[10] Full Translation: China's 'New Generation Artificial Intelligence Development Plan' (2017) [online]. Available at: https://digichina.stanford.edu/work/full-translation-chinas-new-generation-artificial-intelligence-development-plan-2017/

[11] GONG, J. et al. AI Governance in China: Strategies, Initiatives, and Key Considerations. Practical Law. 2024. [online]. Available at: https://www.twobirds.com/en/insights/2024/china/ai-governance-in-china-strategies-initiatives-and-key-considerations

[12] JOCHHEIM, U. China's ambitions in artificial intelligence. EPRS. 2021. [online]. Available at: https://www.europarl.europa.eu/RegData/etudes/ATAG/2021/696206/EPRS_ATA(2021)696206_EN.pdf

[13] O'SHAUGHNESSY, M. Lessons From the World's Two Experiments in AI Governance. Carnegie Endowment for International Peace. 2023. [online]. Available at: https://carnegieendowment.org/2023/02/14/lessons-from-world-s-two-experiments-in-ai-governance-pub-89035

related risks and impose obligations on entities involved in AI-related business.[14]

The most significant adopted regulations are:

–   the Administrative Provisions on Algorithm Recommendation for Internet Information Services (Algorithm Recommendation Regulation, 2022);

–   the Provisions on Management of Deep Synthesis in Internet Information Service (Deep Synthesis Regulation, 2023);

–   the Provisional Provisions on Management of Generative Artificial Intelligence Services (Generative AI Regulation, 2023).[15]

These above regulations are interconnected and comprise the most targeted and influential regulations, creating requirements for how algorithms and AI will be built and deployed in China. In the case of the first regulation that lays down the rules on the use of algorithm recommendation technologies, perhaps the beginning of the regulation of AI in China. In connection with the regulation, it is also possible to mention in particular the creation of this instrument, the so-called *algorithm register*, which is an online database of algorithms; when algorithms are used, it requires them to provide information, for example about how they were trained and on what data were trained.[16] In the case of the second regulation is a reaction to the identification of deepfakes as the main threats to the information environment. As already follows from the title of the regulation itself, the term "*deep fakes*" is not used here, but an established term "*deep synthesis*" was also used in this regulation.[17] This regulation aims to regulate the use of this technology so that it does not spread false news, violate legal principles or other rules, or mislead the public. Users must also be warned that the content is synthetically created or manipulated.[18] In the case of the third mentioned regulation, we can talk about

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[14]   SULLIVAN, M. Global AI Regulation: A Closer Look at the US, EU, and China. [online]. Available at: https://transcend.io/blog/ai-regulation

[15]   China's New AI Regulations. Latham & Watkins Privacy & Cyber Practice. 2023. [online]. Available at: https://www.lw.com/en/admin/upload/SiteAttachments/Chinas-New-AI-Regulations.pdf

[16]   Provisions on the Management of Algorithmic Recommendations in Internet Information Services [online]. Available at: https://www.chinalawtranslate.com/en/algorithms/

[17]   HINE, E. and FLORIDI, L. New deepfake regulations in China are a tool for social stability, but at what cost?. In *Nat Mach Intell* Vol. 4, (2022). pp. 608–610 [online]. Available at: https://www.researchgate.net/publication/362149296_New_deepfake_regulations_in_China_are_a_tool_for_social_stability_but_at_what_cost

[18]   *Ibid.*

a groundbreaking regulation, and this adoption was a reaction to the rapid rise of generative artificial intelligence. From the above, it can be concluded that China remained active with the onset and rapid development of generative artificial intelligence. As mentioned above, the latest regulation regarding AI in China *Generative AI Regulation*, which came into effect on August 15, 2023. This is the first regulation that specifically regulates generative artificial intelligence. Even in this case, the original proposal was not well-received, so its current wording differs from the original proposal.[19] The initial draft of this regulation included quite strict requirements for these systems, leading to widespread discussions. In short, however, it can be summarized that the current version of this regulation is based on several important principles, namely that generative AI must respect intellectual property rights and socialist values and cannot threaten demanding security, cannot support discrimination or the spread of disinformation, and must also to respect the rights of others and not to endanger both the physical and mental health of individuals. It also emphasizes the need to adopt measures to improve transparency.[20] However, these regulations are followed by other regulatory frameworks in the form of various provincial guidelines and ethical codes.[21]

Even though the focus is now on China, what further steps will it take to regulate AI, especially when adopting a comprehensive law on AI modelled on the EU. Experts[22] do not expect that it will be adopted and approved shortly. At this point, however, it is essential to mention that in 2023, a state research institute in China developed an *advisory version of this act*,[23] which version also containing the so-called negative list of areas or existing products that cannot be marketed and

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[19] *See more:* Comparison Chart of Current vs. Draft rules for Generative AI [online]. Available at: https://www.chinalawtranslate.com/en/comparison-chart-of-current-vs-draft-rules-for-generative-ai/

[20] ZHU, S. The Chinese Path to Generative AI Governance. 2023. p. 12 [online]. Available at: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4551316

[21] HUW, R. et al. Governing artificial intelligence in China and the European Union: Comparing aims and promoting ethical outcomes. In: The InformaTIon SocIeTy2023, VoL. 39, no. 2, pp. 79–97 [online]. Available at: https://www.tandfonline.com/doi/epdf/10.1080/01972243.2022.2124565?needAccess=true

[22] YANG, Z. Four things to know about China's new AI rules in 2024. MIT Technology Review. [online]. Available at: https://www.technologyreview.com/2024/01/17/1086704/china-ai-regulation-changes-2024/

[23] SHEEHAN, M. China's AI Regulations and How They Get Made. Carnegie Endowment for International Peace. 2023. [online]. Available at: https://carnegieendowment.org/2023/07/10/china-s-ai-regulations-and-how-they-get-made-pub-90117

used without government approval. The plan to set a comprehensive law is stated by 2030 as a government goal. [24]

3. Key differences in both approaches

Differences between the regulation of AI in the European Union and China are significant as they reflect their different values, political priorities and approaches to technological development. In the beginning, it is essential to state that a fundamental difference can already be perceived within the scope of the intention for which AI should benefit. While in China's view, this technology is supposed to ensure the provision of benefits mainly to the state in the form of making the country's competitiveness and economic development, in the EU, the support for AI development is mainly focused on people, freedom of democracy and the preservation of human rights[25].

Also the main difference that can be perceived within these approaches is that the EU has, from the beginning, focused on one complex and central legal regulation, which is already known as the EU AI Act - it promotes a *horizontal* approach that regulates all AI systems and classifies them into separate categories based on the level of risk, from unacceptable risk to minimal risk, and sets the corresponding requirements.[26] Unlike the EU, China prefers a *vertical* approach, adopting regulations for specific systems. In general, each approach has its advantages and disadvantages. While horizontal regulation's primary advantage is to provide developers with greater predictability and reduce legislative loopholes, its disadvantage is that it would not be possible to set specific requirements for all AI applications if not complemented by vertical regulation. On the other hand, if there were only vertical regulations, it could create confusion about compliance. However, the advantage is mitigating specific damage that AI can

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[24] Full Translation: China's 'New Generation Artificial Intelligence Development Plan' (2017) [online]. Available at: https://digichina.stanford.edu/work/full-translation-chinas-new-generation-artificial-intelligence-development-plan-2017/

[25] Legal framework for artificial intelligence: What is the approach of the European Union, the United States and China?. Langlois Lawyers LLP. [online]. Available at: https://www.lexology.com/library/detail.aspx?g=6118b055-37d5-475a-ae69-ee4314d68581

[26] O'SHAUGHNESSY, M. Lessons From the World's Two Experiments in AI Governance. Carnegie Endowment for International Peace. 2023. [online]. Available at: https://carnegieendowment.org/2023/02/14/lessons-from-world-s-two-experiments-in-ai-governance-pub-89035

cause.[27] In the sense of the above, it can be stated that the ideal regulation system should be a combination of both approaches. It cannot be stated that in the case of the EU[28] and China[29], these approaches are exclusively used individually, but both are more inclined towards which approach. These regulations have their supporters and critics based on the reactions to both regulations. While the draft EU AI Act has been criticized for potentially stifling innovation, in the case of China, there have been concerns that these regulations are trying to control information in a targeted manner.[30]

Another difference can also be perceived in the case of maintaining specific ethical standards. The EU primarily supports enforcing fundamental rights regarding permissible innovation and privacy protection. On the other hand, China focuses on promoting economic benefits and technological progress while also outlining certain ethical principles. These principles are intended to ensure the enforcement of justice, particularly in executing automated decisions, and to protect the rights and interests of all parties involved.[31] Regarding technological development, China primarily focuses on investing funds in research and innovation in AI, with the primary goal of becoming a leading player in the world's technological competition. In contrast, the EU emphasizes research and innovation within ethical and legal frameworks, focusing on social consequences.[32] In addition to the above-mentioned differences, certain similarities can also be pointed out, especially an interest in cooperation in creating (perhaps) a global policy regarding AI. Undoubtedly, both regulations within the EU and China will become an inspiration and model for policymakers in several countries. The common interest or effort is to promote safe AI while maximizing its benefits and limiting potential risks.[33]

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[27] HUW, R. et al. Governing artificial intelligence in China and the European Union: Comparing aims and promoting ethical outcomes. In: The InformaTIon SocIeTy2023, VoL. 39, no. 2, pp. 79–97 [online]. Available at: https://www.tandfonline.com/doi/epdf/10.1080/01972243. 2022.2124565?needAccess=true

[28] In the case of the EU regulation, as an example of vertical complementation, the creation of regulation according to individual risk levels can be mentioned, which means that specific requirements for their regulation are set for systems at each level.

[29] As horizontal complementation in China regulations can be mentioned, for example, the regulations regulating generative artificial intelligence, are based on tools such as the algorithm register, which we already mentioned in the previous chapter.

[30] *Ibid.*

[31] *See* supranote 19.

[32] XIA, L.Q. Diplomatic relationship-building in the age of generative AI: the European Union and China. In: Place Branding and Public Diplomacy. Vol. 20-1 2024. p. 4

[33] *Ibid.*

4. Regulation of generative artificial intelligence

One of the aims of this article is to examine the regulation of generative artificial intelligence. In the following section, we will focus on the relevant regulatory provisions in both jurisdictions. As we have already stated, China holds the lead in adopting the first legislation focused on this technology. In the same way, within the EU, the boom in generative artificial intelligence has caused different moods and opinions. The first draft of the EU AI Act did not initially consider generative artificial intelligence systems due to their novelty. This led to intense debates about whether these systems should be included in the regulation. While on the one hand, there were opinions that these systems could be very harmful and dangerous for society if they were misused and should be classified as high-risk[34], on the other hand, there were initiatives for these systems not to be regulated in the act at all, as such a step could significantly limit the development of innovations.[35] In the final version of the EU AI Act, it appears that generative artificial intelligence systems will be enshrined, but outside the "main" classification of artificial intelligence systems divided according to the degree of risk. In contrast, it is a "separate" category of artificial intelligence systems for general use (general-purpose AI),[36] including generative artificial intelligence systems. This category is divided into "two levels", where within the first, all such models will have to meet the requirement for transparency,[37] and the second level includes systems that represent a "systemic risk"[38] and, in this case, will be subject to other additional obligations.[39]

As far as China is concerned, the regulation regarding generative artificial intelligence is based on the principles we mentioned above. However, the government and the state control China's model of regulating generative AI. This regulation focuses in particular on data

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[34] Financial Times: Brussels warns against 'paranoia' when regulating generative AI [online]. Available at: https://www.ft.com/content/f167c499-2399-4b94-8a7b-7a5ccc1bb1cb

[35] *Ibid,*

[36] *See more*: GUTIERREZ. I. C. et al. A Proposal for a Definition of General Purpose Artificial Intelligence Systems [online]. Available at: https://futureoflife.org/wp-content/uploads/2022/11/SSRN-id4238951-1.pdf

[37] In this case, it is also about publishing the training details of such models and proving that they are not infringing copyright when training them.

[38] Any model that uses more than 1025 FLOPs (the number of computer operations) in training qualifies as high impact. For example GPT-4, OpenAI's

[39] *See more*: Final text of the EU AI Act [online]. Available at: https://data.consilium.europa.eu/doc/document/ST-5662-2024-INIT/en/pdf

that is used to train generative artificial intelligence systems, where the requirement to ensure that intellectual property rights are not violated during training must be met; it also stipulates that service providers will be responsible for ensuring that their output is in under the law, including the observance of fundamental socialist values, as well as for the fulfilment of obligations in the field of cyber security and data protection. As for the very approach to the development of generative AI, the EU is primarily based on democratic values and protection against disinformation, where, in contrast to China's approach, it considers the development of AI as strategically important for the country to strengthen its comprehensive national power.[40] Currently, these technologies are also used, for example, for facial recognition in some provinces in China.[41] This different approach may cause some contradictions, but it also creates space for joint dialogue, as concerns about the misuse of this technology to spread disinformation are justified in both the EU and China. Following the above, it is also possible to point out the regulation of *deepfake* technology, or, in China, "*deep synthesis*." While China dedicated a separate regulation to this technology, we find a rather strict regulation in the EU AI Act. Within the EU AI Act, we find specified provisions whose purpose might be to guarantee that the consumer will obtain the information that the content they encounter has been manipulated or artificially created in a certain way[42], with which the legislator wanted to reduce its susceptibility to manipulation. However, we cannot discuss guarantees of the regulation's adequacy because the current wording of the act does not establish a clear framework for the legal responsibility of developers of deepfake technology. The problems that may arise are related to enforcement against the creators of harmful content, who may find a way to circumvent these requirements. The Chinese regulation likely reflects China's history of trying to maintain tight control over the Internet. It applies to platform providers as well as end users who use this service. In the sense of these regulations, artificially generated or modified content must also be marked. This content cannot be used to spread fake news, misused to destabilize the state and threaten the state establishment, and so on. However, it is a relatively complex regulation

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[40] XIA, L.Q. Diplomatic relationship-building in the age of generative AI: the European Union and China. In: Place Branding and Public Diplomacy. Vol. 20-1 2024. p. 4

[41] *See more:* Shenzhen AI start-up Intellifusion helps city police identify jaywalkers and banned drivers [online]. Available at: https://www.scmp.com/tech/start ups/article/3008700/shenzhen-ai-start-intellifusion-helps-city-police-identify

[42] Article 52 point 3 of the EU AI Act

whose content goes beyond this technology. Of course, we cannot forget that there are other relevant and related EU regulations regarding deepfake technology, but for the purposes of this article, we are focusing only on the EU AI Act. Therefore, the EU relies more on preventive methods to adjust this technology, while it seems that this technology has caused relatively more significant concerns in China.[43] Based on the above, it can be concluded that concerning the adopted regulations, China has a primary interest in strictly regulating deepfake technologies and generative artificial intelligence systems. However, sceptics suspect such actions of China, given the ambition adopted regulations, do not correspond with China's ambition to become a world leader in the development and regulation of AI. Although China faces suspicions that behind this is the intention of even greater control of the flow and subsequent collection of information, these claims might be prematurely alienating.

Conclusion

Artificial intelligence has been a very debated topic in recent years, triggering a particular race to take the lead in its regulation. We must recognize that the leadership in adopting complex AI regulation belongs to the EU, but other countries are still catching up. It is possible to perceive that China, in particular, has shown strong ambitions to become a leader not only in the field of AI system development but also in their regulation, which was reflected in its relatively quick regulatory initiative in the form of the adoption of several specific regulations and also the interest in preparation on the creation of comprehensive legislation related to AI. However, based on the mentioned differences, different approaches to the regulation of AI between the EU and China can be perceived, while each of them tries to achieve its own goals and values in the use of this technology, and therefore, it is not yet very possible to assume that these regulations will be harmonized in some way. In addition to the fundamental differences in the approaches to AI regulations in general, it can be observed that the EU and China take significantly different approaches in the context of generative artificial intelligence. However, it is essential to note that the initial assumptions were only partially objective. China's regulation not only focuses on controlling the flow and generation of information but also aims to

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[43] *See* supranote 31.

support the protection of the state and individual interests. It includes protecting intellectual property rights, addressing issues related to the use of data for training generative models, and tackling misinformation and discrimination. While the EU AI Act initially proposed much stricter regulation of generative artificial intelligence, in its final phase, it was decided that only models with systemic risk would be subject to specific requirements.

Although different approaches, these jurisdictions also have specific common goals, such as emphasizing supporting AI technology's safe and sustainable development. Currently, joint agreements between the EU and China are already being formed[44], on which they undertake to cooperate and support a fair environment for the development of innovations. It is imperative to closely monitor the interactions and collaborations among individual leaders in AI regulation. Their mutual inspiration and influence will significantly impact the development and enforcement of future AI regulations.

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44 AI Safety Summit: China, US and EU agree to work together. [online]. Available at: https://www.reuters.com/technology/britain-brings-together-political-tech-leaders-talk-ai-2023-11-01/

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