COMPARATIVE JURISDICTIONAL MEMO · BIOMETRIC IDENTIFICATION

EU AI Act vs Interim Measures for Generative AI Service Management

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

EU · BINDING REGULATION

EU AI Act

EU-AIA-2024

TREATMENT OF BIOMETRIC IDENTIFICATION

governs

Art. 5(1)(h) prohibition + Art. 26(10) post-hoc rules

Primary source: Regulation (EU) 2024/1689

CN · BINDING REGULATION

Interim Measures for Generative AI Service Management

CN-GENAI-2023

TREATMENT OF BIOMETRIC IDENTIFICATION

silent

Covered by Personal Information Protection Law separately

Primary source: CAC Order No. 15

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.

Bibliography

1. Regulation (EU) 2024/1689 — EU AI Act.
2. CAC Order No. 15 — Interim Measures for Generative AI Service Management.
3. Policy Window — Biometric Identification (cross-jurisdiction topic article with full coverage matrix).

Catalog-derived comparison · Generated 2026-07-09T22:02:13 UTC · No LLM- generated prose. All classifications + citations come from the typed catalog. See https://policywindow.org/wiki/methodology for the full editorial discipline.