COMPARATIVE JURISDICTIONAL MEMO · AGENTIC AI GOVERNANCE

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 AGENTIC AI GOVERNANCE

implicit

Arts. 26-29 deployer obligations apply to agent operators; Arts. 51-55 GPAI obligations capture the underlying model

Primary source: Regulation (EU) 2024/1689

UK · POLICY STATEMENT

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

UK-WHITEPAPER-2023

TREATMENT OF AGENTIC AI GOVERNANCE

silent

Principle-based, regulator-led; no agent-specific cross-cutting rule

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: Should governance attach to the AGENT (multi-step actions, tool use, recursion) or to the model that powers it? Capability-tier vs action-tier frames are unresolved across jurisdictions.

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 — Agentic AI Governance (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.