

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

Editorial verdict: **both silent** — see comparison narrative below.

EU · BINDING REGULATION

## EU AI Act

EU-AIA-2024

TREATMENT OF COMPUTE + MODEL-WEIGHT EXPORT CONTROLS

**silent**

EU AIA does not address compute / weight export controls; lives in dual-use Regulation (EU) 2021/821

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

UK · POLICY STATEMENT

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

UK-WHITEPAPER-2023

TREATMENT OF COMPUTE + MODEL-WEIGHT EXPORT CONTROLS

**silent**

Principle-based; export controls lives in DBT / NCSC export-licensing regime

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

## What this comparison shows

Neither instrument addresses this topic. This is a policy lacuna — there is no incumbent canonical position from either regime, so future regulator activity on this topic shapes the entire field.

**Contested question:** Should compute + weight export controls govern by (a) recipient jurisdiction, (b) capability tier of the controlled artifact, or (c) end-use intent? Each rule generation has shifted between these frames.

## 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 — Compute + Model-Weight Export Controls](#) (cross-jurisdiction topic article with full coverage matrix).