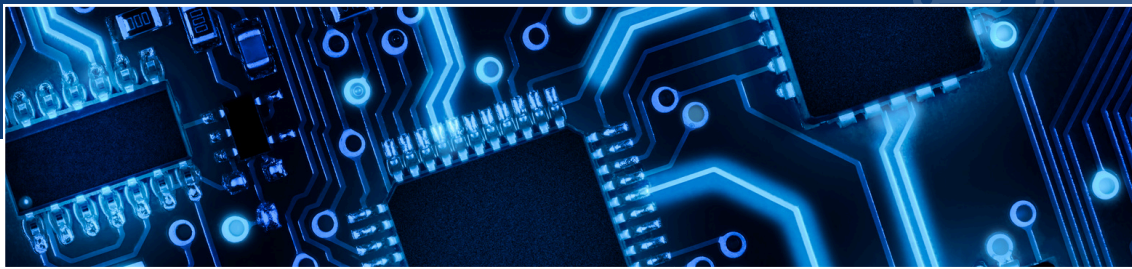


# Artificial Intelligence & Technology In International Law

News Update | April 2025



## African Declaration on AI Signed

During the inaugural Global AI Summit on Africa, held in Kigali on April 3rd and 4th, 2025, an African Declaration on AI was signed by over 50 countries. The declaration, announced on April 4th, outlines a collective commitment to harness AI for Africa's economic advancement, establish the continent as a leader in ethical and inclusive AI adoption, and ensure the responsible development and governance of AI technologies. The Declaration was signed by 54 signatories, including the African Union (AU) and Smart Africa, along with 52 African countries. It acknowledges the transformative potential of AI while recognizing the continent's unique opportunities, risks, and challenges, aligning with existing African Union and UN strategies.

Guided by principles of sovereignty, inclusivity, diversity, ethical safeguards, and collaboration, the declaration aims to leverage AI for innovation and competitiveness, position Africa as a global leader in ethical and inclusive AI adoption, and foster sustainable and responsible AI governance. Key commitments include developing African AI talent and research, establishing frameworks for open data and robust data governance, building distributed sovereign compute infrastructure, promoting an "Africa-first" market approach with regional hubs, creating a \$60 billion Africa AI Fund for strategic investment, implementing responsible national AI policies and governance frameworks, and establishing an Africa AI Council for high-level strategic cooperation.

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## EDPB Released Report on AI Privacy Risks in Large Language Models

On April 10, 2025, the European Data Protection Board (EDPB) has released a report titled "AI Privacy Risks & Mitigations Large Language Models (LLMs)." This report introduces a comprehensive risk management methodology designed to systematically identify, assess, and mitigate privacy and data protection risks associated with LLM systems. It offers practical steps and measures to address common privacy concerns when deploying LLM systems. To illustrate the application of its risk management framework, the report includes examples such as:

- A virtual assistant (chatbot) for customer inquiries.
- An LLM system for monitoring and supporting student progress.
- An AI assistant for travel and schedule management.

The report aims to provide Data Protection Authorities (DPAs) with a thorough understanding of how LLMs function and the associated risks, thereby supporting their oversight activities. It also serves as a resource for developers and users of LLMs. This initiative was launched under the EDPB's Support Pool of Experts program, following a request from the Croatian Data Protection Authority (DPA).

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## EU Commission Launches Consultation on AI Act's General-Purpose AI Rules

The European Commission initiated a consultation on April 22, 2025, seeking input on forthcoming guidelines for general-purpose AI (GPAI) models under the EU AI Act. Aimed at clarifying existing provisions, the consultation will help shape guidelines addressing crucial aspects such as the definition of a GPAI model, the concepts of placing on the market and fine-tuning, the role of the AI Office in ensuring compliance, and how an approved Code of Practice might serve as a benchmark for regulatory adherence. The Commission is inviting feedback from a wide range of stakeholders, including GPAI model providers, downstream AI system providers, public authorities, and experts, with a deadline of May 22, 2025. The final guidelines and the Code of Practice are anticipated to be published around August 2025.

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## Texas Passes Revised Responsible AI Governance Bill

The Texas House of Representatives recently passed a revised Texas Responsible AI Governance Bill (TRAIGA) on April 23, 2025, set to take effect on January 1, 2026. The updated legislation notably narrows its scope from the original draft by removing regulations around "high-risk AI systems" and disclosure requirements for all developers and deployers, now focusing those requirements solely on government entities. Key changes also include the elimination of mandatory annual impact assessments and risk mitigation policies for AI deployers. However, TRAIGA introduces specific prohibitions on certain AI applications, including government use of "social scoring" and specific biometric identification methods, as well as broader restrictions on AI systems designed for manipulation, anti-constitutional purposes, unlawful discrimination, and the creation of illegal explicit content, with the Texas Attorney General's office responsible for enforcement and penalties ranging from \$10,000 to \$200,000 per violation.

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## CNIL Publishes Recommendations on AI Use in French Public Services Following Sandbox Program

The French Data Protection Authority (CNIL) has released key recommendations for the deployment of Artificial Intelligence in public services, stemming from its 2023-2024 sandbox initiative. This program provided tailored support to AI projects within the public sector, addressing critical legal and technical considerations. The recommendations offer practical guidance on achieving compliance with data protection standards when developing and implementing AI, covering areas such as the creation of databases for AI training, the necessity of human oversight, and the principle of data minimisation in generative AI applications. The CNIL also announced that its next sandbox will focus on the silver economy, with selected projects to be revealed shortly.

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## Saudi Arabia Invites Input on Draft Global AI Hub Law

Saudi Arabia's Communications, Space & Technology Commission (CST) launched a public consultation on April 14, 2025, for its draft Global AI Hub Law, a key step in the Kingdom's strategy to cultivate an attractive regulatory environment for technology investments, particularly in data centers and artificial intelligence. The proposed law aims to establish a framework for "AI Hubs," which are sovereign and foreign-affiliated data centers, outlining three distinct categories: Private Hubs for hosting countries' data under their own laws, Extended Hubs operated by authorized entities serving themselves or others under a guest country's jurisdiction, and Virtual Hubs managed by local providers but subject to a designated foreign state's laws. This initiative signifies a significant advancement in Saudi Arabia's efforts to attract digital infrastructure and data-intensive industries, building on regional precedents like independent free zones with the innovative AI Hub concept. The consultation is open to government and private entities, investors, and the public, seeking to gather input until May 14, 2025.

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## EU Commission Explores Simplifying AI Act

Following the introduction of the landmark EU AI Act, the European Commission is reportedly considering streamlining the legislation to alleviate the administrative burden on affected parties. At a meeting in April 2025, the Commission's Technology Chief, Henna Virkkunen, affirmed commitment to the Act's objectives but indicated a review of the "administrative burden," specifically looking at potentially reducing "some reporting obligations."<sup>1</sup> This move is part of a broader effort to evaluate and potentially scale back several digital regulations later in the year, with the Commission planning to solicit industry feedback on areas where regulatory uncertainty impedes AI development and adoption. This consideration for simplification follows the earlier decision by the Commission to abandon plans for a strict AI liability scheme.

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## **EU Boosts Digital Transformation with €1.3 Billion Investment in AI**

The European Commission has unveiled its Digital Europe Work Programme for 2025-2027, committing €1.3 billion to accelerate the deployment of key digital technologies across the EU, with a significant emphasis on artificial intelligence. This substantial investment aims to foster the adoption of reliable AI in public administrations and businesses, bolster Europe's technological sovereignty, and advance the EU's digital ambitions. The program will support crucial AI initiatives, including funding for testing and experimentation facilities, promoting secure and trustworthy AI systems aligned with the upcoming AI Act, encouraging AI use in sectors like law enforcement and crisis response with fundamental rights safeguards, improving the availability of high-quality datasets, and providing tailored support for AI adoption by SMEs through Digital Innovation Hubs. Funding calls are set to commence in April 2025, open to eligible entities within the EU and participating countries.

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## **US New Policies on Federal Agency AI Use and Procurement**

The US Office of Management and Budget (OMB) has issued two new memoranda (M-25-21 and M-25-22) on April 7, 2025, significantly updating federal AI policy to promote AI as a strategic tool for efficiency and national strength while retaining core protections for public trust and civil rights. Key changes include redefining Chief AI Officers as "change agents" to accelerate deployment, mandating ongoing oversight and human involvement for high-impact AI systems affecting rights or safety, implementing procurement reforms favoring open standards and American-developed AI, and adjusting public accountability measures to emphasize human appeal rights and review access over explicit public notice, all building on prior requirements for AI impact assessments and inventories.

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## Hong Kong Issues Guidelines on Employee Use of Generative AI

In a significant move to address the burgeoning use of generative AI in the workplace, Hong Kong's Office of the Privacy Commissioner for Personal Data (PCPD) released its "Checklist on Guidelines for the Use of Generative AI by Employees" on March 31, 2025. These guidelines provide organisations with a framework for developing internal policies, offering key recommendations such as clearly defining the scope of permissible AI tools and uses, mandating robust personal data protection measures for input and output, stressing the importance of lawful and ethical use, requiring employees to prevent bias and verify AI-generated content, detailing necessary data security protocols including device and user restrictions, and outlining consequences for policy violations. To further assist businesses, the PCPD has also launched an AI Security Hotline to handle enquiries and support the secure and privacy-aware adoption of AI technologies.

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## EU AI Office Launches Survey to Expand AI Literacy Repository

The European Commission's AI Office has initiated a new survey to collect diverse examples of AI literacy practices from a wide range of organisations. This effort aims to enrich the living repository of AI literacy initiatives, established following the application of Article 4 of the AI Act. Article 4 mandates that providers and deployers of AI systems ensure their staff and others involved with these systems possess a sufficient level of AI literacy. By opening the survey to all interested organisations, the AI Office seeks to gather a comprehensive collection of practices to foster learning and facilitate the exchange of knowledge among those developing and using AI systems across the EU. The contributions will be reviewed for transparency and reliability before being included in the public repository, serving as valuable examples though not guaranteeing compliance with Article 4 of the AI Act.

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## Bank of England Releases Report on AI Risks in Finance

The Bank of England's Financial Policy Committee (FPC), in its "Financial Stability in Focus" report released on April 9, 2025, is placing closer scrutiny on the growing use of Artificial Intelligence within the UK's financial system. The report highlights several key emerging risks, including potential financial instability due to over-reliance on AI for core decisions, the possibility of AI-driven market manipulation amplifying volatility, increased herding behaviour and market concentration from the use of similar AI models, systemic operational dependencies on a limited number of AI service providers, and heightened cybersecurity threats. The Bank of England is actively working with the industry, including through the AI Consortium, to better understand AI deployment and risk management practices, while also considering the evolution of regulations to support safe AI adoption.

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## Updates in Connecticut AI Governance Bill

Connecticut AI governance bill has cleared the Senate Committee on General Law and is now before the House of Representatives. This legislation aims to establish a broad regulatory framework for AI development and deployment within the state, impacting any entity doing business in Connecticut. The Bill introduces a risk-based approach, specifically targeting "high-risk" AI systems used in critical decisions like hiring and healthcare, and mandates developers and deployers take steps to mitigate risks, including algorithmic discrimination, through governance and impact assessments. Key consumer protections are also central, requiring clear notification when AI is used in decision-making, explanations of its function, options for human review, and disclosure of AI-generated content. Enforcement power rests solely with the Connecticut Attorney General, including a notice-to-cure process for non-compliance. If approved, most provisions would take effect from October 1, 2025, with core developer and deployer obligations beginning a year later.

[Click Here to See Bill](#)

## EU AI Continent Action Plan

On April 9, 2025, the European Commission has launched the AI Continent Action Plan, aiming to establish Europe as a global leader in Artificial Intelligence by transforming its industries and talent pool. The plan focuses on five key pillars: building a large-scale AI data and computing infrastructure through a network of 13 deployed AI Factories and planned AI Gigafactories equipped with approximately 100,000 state-of-the-art AI chips and mobilising €20 billion investment via InvestAI, alongside proposing a Cloud and AI Development Act to at least triple EU data centre capacity; increasing access to large, high-quality data by creating Data Labs and launching a Data Union Strategy in 2025; developing algorithms and fostering AI adoption in strategic sectors through the upcoming Apply AI Strategy to boost the current 13.5% adoption rate among EU companies; strengthening AI skills and talent via initiatives facilitating international recruitment, AI fellowships, and educational programmes; and ensuring regulatory simplification with the AI Act and the launch of the AI Act Service Desk for compliance assistance. Public consultations on the Cloud and AI Development Act and Apply AI are open until June 4, 2025, with a third on the Data Union Strategy in May, as the Commission drives dialogues with industry and the public sector to shape the plan's implementation.

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