

Updated monthly for CMOs and senior marketing leaders. Covers US federal, EU, US state laws, and industry self-regulation relevant to AI in marketing and advertising. Not legal advice. Verify all information with qualified counsel before acting.

KEY DATES AT A GLANCE

Date	What	Status
2 Aug 2026	EU AI Act: Article 50 chatbot + AI content transparency obligations in force	IMMINENT
2 Dec 2026	EU AI Act: AI-generated content watermarking deadline (Omnibus grace period)	Confirmed
2 Dec 2026	EU AI Act: New prohibition on non-consensual AI intimate imagery takes effect	Confirmed
1 Jan 2027	Colorado SB 189 (ADMT): New automated decision-making transparency framework	Signed law
2 Dec 2027	EU AI Act: Annex III high-risk AI systems obligations (Omnibus extension)	Confirmed

EUROPEAN UNION

EU AI Act Omnibus: Formally Adopted 29 June 2026

UPDATED JULY 2026

The Council of the EU gave its final green light to the AI Act simplification package on 29 June 2026, following the European Parliament's formal endorsement on 16 June. The Omnibus is now law and will be published in the EU Official Journal imminently, entering into force three days after publication. Key changes: high-risk AI system obligations under Annex III (employment, education, credit scoring) are deferred from 2 August 2026 to 2 December 2027. A new prohibition on AI-generated non-consensual intimate imagery takes effect 2 December 2026.

Marketer impact: Your August 2026 preparation work for high-risk AI systems is not wasted, but the enforcement deadline has moved 16 months. Redirect bias audit and conformity assessment workstreams to a December 2027 target. Article 50 transparency obligations (chatbot disclosure, AI-generated content labelling) remain in force from 2 August 2026 as originally planned.

Source: Council of the EU press release, 29 June 2026; DLA Piper GENIE update, June 2026 | eu.int

EU AI Act Article 50: Transparency Obligations — 2 August 2026

ACTION REQUIRED

Despite the Omnibus deferral on high-risk systems, Article 50 transparency obligations take effect on 2 August 2026 as originally planned. Requirement 1: users must be clearly informed when they interact with an AI system (chatbots, virtual assistants). Requirement 2: AI-generated content that could mislead the public — including deepfakes and AI-generated text on matters of public interest — must carry machine-readable watermarking or labelling. Exception: a four-month grace period applies to generative AI systems already on the EU market before 2 August 2026, extending their watermarking deadline to 2 December 2026.

Marketer impact: If your brand deploys AI chatbots or virtual assistants visible to EU users, disclosure language is required from 2 August. If you produce AI-generated video, image, or text content for EU audiences and your tool was launched before 2 August, you have until December 2 to implement watermarking. Systems launched after 2 August must comply immediately.

Source: EU AI Act Article 50; Latham & Watkins client alert, May 2026; European Commission draft guidelines on Art. 50, May 2026 | lw.com

UNITED STATES — FEDERAL

White House AI Security Executive Order — June 2026

UPDATED JULY 2026

President Trump signed an executive order on 2 June 2026 directing federal agencies to prioritize AI security and harden government systems against adversarial threats. The order bars federal licensing or permitting requirements for new AI model releases and directs the Attorney General to enforce existing criminal statutes against AI-enabled computer crimes. A separate voluntary 30-day review process for advanced commercial model releases was introduced informally alongside the order, as applied to OpenAI's GPT-5.6 launch in June. No mandatory licensing framework was created.

Marketer impact: No new mandatory compliance obligations for commercial marketing AI. The order reinforces the federal posture of promoting AI innovation while leaving enforcement risk concentrated at the state level. The voluntary review process for frontier models is relevant primarily to companies building or deploying the most advanced models — not to typical marketing AI deployments.

Source: White House Presidential Action, 2 June 2026 | [whitehouse.gov](https://www.whitehouse.gov); CNN, 25 June 2026

AI Export Controls: Anthropic Models Restricted Then Reinstated

UPDATED JULY 2026

On 12 June 2026, the US Commerce Department ordered Anthropic to restrict access to Fable 5 and Mythos 5 for all foreign nationals globally, citing national security concerns. Anthropic disabled the models worldwide. On 30 June, the administration rescinded the directive following Anthropic's agreement to proactively detect security risks and cooperate with the government on model release protocols. Access resumed 1 July. Separately, OpenAI voluntarily restricted GPT-5.6's initial launch to government-approved enterprise customers under the same informal review framework.

Marketer impact: Even though the Anthropic ban lasted only 18 days, it established a live precedent for instant, zero-notice global service suspension driven by US government action. Marketing teams using frontier AI tools — regardless of vendor — should map which workflows depend on which models and build contingency plans for unplanned service interruptions.

Source: Anthropic blog, 12 June 2026; TechCrunch, 30 June 2026; CNN, 25 June 2026 | [anthropic.com](https://www.anthropic.com)

FTC: Continued AI Enforcement Under Existing Statutes

NEW JULY 2026

In the absence of comprehensive federal AI legislation, the FTC continues to pursue AI-related enforcement under existing FTC Act authority. Focus areas confirmed in 2026 include: deceptive claims about AI product capabilities; undisclosed AI in consumer-facing interactions; and algorithmic pricing practices that may constitute unfair or deceptive trade practices. State AGs are coordinating multistate investigations in parallel, particularly around AI in pricing, marketing to minors, and housing.

Marketer impact: Review all marketing claims about AI product features for accuracy against actual system functionality. Ensure any AI-generated customer-facing content is disclosed where required by state law. If your brand uses algorithmic pricing tools, document the pricing logic and human oversight procedures.

Source: Morgan Lewis AI enforcement update, April 2026; Wilson Sonsini 2026 AI forecast | [morganlewis.com](https://www.morganlewis.com)

UNITED STATES — STATE LAWS

Colorado SB 189: Original AI Act Repealed, New ADMT Framework Signed

UPDATED JULY 2026

Governor Polis signed SB 189 on 14 May 2026, formally repealing the original Colorado AI Act before its 30 June 2026 enforcement date. The new Automated Decision-Making Technology (ADMT) framework takes effect 1 January 2027. Key differences from the original: disclosure and consumer rights requirements replace the original bias audit and algorithmic impact assessment mandates. Scope is narrower. Critically, SB 189 voids any contract clause purporting to indemnify a party for its own discriminatory ADMT-related acts — including AI vendor contracts.

Marketer impact: The June 30 compliance deadline is no longer operative. Redirect bias audit workstreams to a January 2027 target focused on transparency obligations rather than full impact assessments. Review all AI vendor contracts for discriminatory-act indemnification language — those clauses are now unenforceable in Colorado.

Source: Colorado SB 189, signed 14 May 2026; Gunderson Dettmer 2026 AI laws update | [colorado.gov](https://www.colorado.gov)

New York AI Synthetic Performers Disclosure Law — In Force

UPDATED JULY 2026

New York SB S8420A took effect 9 June 2026. Advertisers must conspicuously disclose when advertisements shown to New York consumers contain synthetic performers — digitally created AI-generated human likenesses not identifiable as any real person. Penalties: \$1,000 for first violations, \$5,000 for subsequent violations. Exemptions apply to audio-only ads, AI-powered language translation, and promotional materials for expressive works where synthetic performer use is consistent with the underlying work. The law is separate from New York's deceased performer digital replica law (SB S8391), which requires prior consent from heirs before using a deceased performer's digital likeness.

Marketer impact: Audit all active and upcoming creative for AI-generated human visual talent. Implement visible on-screen disclosure for any synthetic performers in ads served to New York audiences. Ensure your creative and media agencies are applying the same standard to work produced on your behalf.

Source: New York SB S8420A; Pearl Cohen 2026 AI law roundup | nysenate.gov

California, Illinois, Texas: Existing Laws Remain in Full Force

NEW JULY 2026

Despite the Trump administration's executive order signalling intent to challenge 'onerous' state AI laws, no federal preemption has taken effect. California AB 2013 (AI training data disclosure), Illinois HB 3773 (AI in employment decisions), and Texas TRAIGA (AI governance and employment disclosure) are all operative. California's SB 243 companion chatbot safety law and AB 489 (prohibition on AI implying healthcare licensure) have been in effect since 1 January 2026. State AGs retain full enforcement authority under existing UDAP statutes regardless of the federal executive order.

Marketer impact: Do not delay state-level compliance programs on the assumption that federal preemption will arrive in time to matter. Multi-state operations need a compliance matrix that addresses each state's specific disclosure, opt-out, and non-discrimination requirements, as they vary meaningfully.

Source: Gunderson Dettmer; Wilson Sonsini; Akerman LLP 2026 AI law updates | various

INDUSTRY SELF-REGULATION

Cannes Lions 2026: Mandatory AI Disclosure Now Standard in Awards

NEW JULY 2026

Cannes Lions 2026 (22-26 June) debuted mandatory AI use disclosure requirements for all award entries, content detection tooling, and a review panel empowered to disqualify entries post-award. This follows the revocation of 12 awards — including a Grand Prix — at Cannes Lions 2025 after an agency's case film was found to use AI-generated content to simulate events that never occurred. The advertising industry's most visible awards body has now formalized AI transparency as a baseline requirement, setting a disclosure standard that brand clients and agencies are likely to adopt more broadly.

Marketer impact: If you haven't already established clear internal protocols for documenting where AI was used in creative production, Cannes Lions' awards framework provides a practical template. Proactive AI use documentation protects against awards revocations, client disputes, and regulatory inquiry.

Source: Storyboard18 Cannes Lions 2026 preview; Marketing Dive, 2026 | canneslions.com

IAB AI Transparency Framework: Procurement Standard Gaining Traction

NEW JULY 2026

The IAB's AI Transparency and Disclosure Framework continues to be adopted by media buyers and publishers as a de facto procurement standard for AI-generated advertising content. Buyers are increasingly requiring vendors to complete IAB-aligned AI disclosure documentation as part of RFP responses, covering training data provenance, output disclosure practices, and human review procedures. NAI members have similarly integrated AI data-use transparency into their code of conduct review processes.

Marketer impact: If your media buying team or agency partners haven't yet integrated IAB AI transparency requirements into vendor evaluation, add this to the next RFP template update. Proactive adoption reduces compliance exposure as state disclosure laws expand.

Source: IAB AI Transparency and Disclosure Framework; NAI Code of Conduct updates | iab.com

