FRIA template under the EU AI Act: the Article 27 draft and what deployers must do

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Short answer: the FRIA template is the European Commission's draft questionnaire for the fundamental rights impact assessment that certain deployers of high-risk AI systems must complete under Article 27 of the EU AI Act, published for feedback on 16 November 2026. Deployers must comply from 2 December 2027, comments are open until 15 January 2027, and testing volunteers can apply until 4 December 2026. It matters because lawyers can now see the expected structure a year before the duty applies.

TL;DR The short version

- The European Commission published on 16 November 2026 a draft template for the fundamental rights impact assessment that certain deployers of high-risk AI must complete under Article 27 of the EU AI Act.
- Deployers must comply from 2 December 2027; comments are open until 15 January 2027 and testing volunteers could apply until 4 December 2026.
- Lawyers can now map the expected structure and start gathering evidence a year early; this is not legal advice.

Read online, listen to it, or change the text size: https://blogs.iictp.org/fria-template-eu-ai-act-article-27-draft-explained

What is a fundamental rights impact assessment?

It is an assessment of how a deployer's use of a high-risk AI system may affect fundamental rights. Article 27 applies it to certain deployers of high-risk systems listed in Annex III. It must be done before deployment and updated when the deployer considers that any of the listed elements has changed or is out of date.

How the template works

- The AI Office developed it under Article 27(5), with input from the EU Agency for Fundamental Rights.
- It follows the structure of Article 27(1) and asks guiding questions.
- A draft explanatory notice covers which deployers need an assessment, when, and how the duty relates to provider obligations.
- Once final, deployers must use it and notify results to the market surveillance authority under Article 27(3).
- The Commission plans an automated version on the AI Act Single Information Platform.

What is new

The draft turns a statutory list of elements into a working document. Before this, organisations had to design their own format. The Commission is also running a voluntary test in which selected deployers apply the draft to one of their own systems with AI Office support, including an introductory session and a closing discussion.

Dates reported by the Commission

- 16 November 2026: draft template and explanatory notice opened for feedback.
- 4 December 2026: deadline to express interest in testing.
- 15 January 2027: public feedback closes.
- 2 December 2027: deployers must comply with the Article 27 obligation.

Limitations and open questions

- It is a draft. Questions and guidance may change.
- Taking part in the test is voluntary and does not affect legal obligations.
- Whether a particular client is a covered deployer needs analysis of the Act and the explanatory notice, not this summary.
- The assessment does not replace a data protection impact assessment analysis under the GDPR; check how they interact for your facts. This is not legal advice. Sources were read on 26 November 2026. Products, rules and standards change, so check the linked originals before you rely on any detail.

How to start now

1. Inventory AI systems the client uses and screen them against Annex III.
2. For each candidate, decide the organisation’s role: provider, deployer or both.
3. Download the draft and run it on one real system to find missing information.
4. Write into procurement contracts the information you need from providers.
5. Consider applying to test before 4 December 2026, and file comments before 15 January 2027.
6. Assign an owner and triggers for updating each assessment.

What it means for lawyers and compliance teams

The slow part is evidence: how the system is used, who is affected, how often, what oversight exists and what happens when harm occurs. Those facts sit with operations teams, not in the legal department. A pilot assessment now will show which contracts and logs are missing while there is time to fix them.

Frequently asked questions

- **What is the FRIA template?** A draft Commission questionnaire for assessments required by Article 27 of the AI Act.
- **When does the obligation apply?** From 2 December 2027, according to the Commission.

- **When must the assessment be done?** Before the high-risk system is deployed, with updates when relevant elements change.
- **Who receives the results?** The market surveillance authority must be notified under Article 27(3).

Related reading

- EU AI Act Article 5 prohibited practices
- LLMs in high-risk recruitment systems
- What a decision record must say
- AI Practitioner certification

> Related credential: AI Practitioner. Explore the exam facts and syllabus.

Sources and further reading

1. European Commission. Commission seeks feedback on draft template for the fundamental rights impact assessment under the AI Act. 16 November 2026. digital-strategy.ec.europa.eu/en/news/commission-seeks-feedback-draft-template-fundamental-rights-impact-assessment-under-ai-act

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