



## EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR COMMUNICATIONS NETWORKS, CONTENT AND TECHNOLOGY

Artificial Intelligence Office  
Artificial Intelligence Regulation and Compliance

Brussels  
CNECT.A.2/

### **Stakeholder consultation on transparency requirements for certain AI systems under Article 50 AI Act**

Disclaimer: This document of the AI Office is prepared for the purpose of consultation and does not prejudice the final decision that the Commission may take on the final guidelines or Code of Practice on transparency requirements under Article 50 AI Act. The responses to this consultation will provide input for the preparation of a Code of Practice and guidelines on the transparency requirements for certain AI systems under Article 50 AI Act.

This consultation is targeted to stakeholders of different categories, including, but not limited to, providers and deployers of interactive and generative AI models and systems, providers and deployers of biometric categorisation and emotion recognition systems, private and public sector organisations using such interactive and generative AI systems, as well as academia and research institutions, civil society organisations, governments, supervisory authorities and the general public.

The Artificial Intelligence Act ('the AI Act'), which entered into force on 1 August 2024, creates a single market and harmonised rules for trustworthy and human-centric Artificial Intelligence (AI) in the EU <sup>(1)</sup>. It aims to promote innovation and the uptake of AI, while ensuring a high level of protection of health, safety and fundamental rights, including democracy and the rule of law.

Among various obligations, trustworthiness of AI systems is ensured by the AI Act through a set of requirements that aim to ensure transparency and to inform people when they are interacting with or being exposed to certain AI systems and their outputs. These transparency requirements are set out in Article 50 AI Act and will be applicable from 2 August 2026.

These transparency requirements aim to enable natural persons to recognise interaction with and content generated or manipulated by AI systems, thus reducing the risks of impersonation, deception or anthropomorphisation and fostering trust and integrity in the information ecosystem.

First, Article 50(1) AI Act obliges providers of AI systems that directly interact with natural persons to ensure that those persons are informed that they are interacting with an AI system and not a human, unless this is obvious from the point of view of a natural person who is reasonably well-informed, observant and circumspect, taking into account the circumstances and the context of use. Second, Article 50(2) AI Act aims to facilitate trustworthy detection and identification of AI-generated or manipulated content by

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<sup>(1)</sup> *Article 1(1) AI Act.*

requiring providers to mark such content in a machine-readable manner and enabling related detection mechanisms. Third, Article 50(3) AI Act requires deployers of emotion recognition or biometric categorisation AI systems to ensure that individuals exposed to these systems are informed about their operation. Fourth, Article 50(4) AI Act requires deployers of AI systems generating or manipulating deep fake content, or AI-generated or manipulated text publications intended to inform the public on matters of public interest to inform about the artificially generated or manipulated origin of the content, except in defined cases. Fifth, Article 50(5) AI Act imposes horizontal requirements on the above-mentioned transparency measures to ensure that the required information is provided to the natural persons concerned in a clear and distinguishable manner at the latest at the time of the first interaction or exposure, while respecting applicable accessibility requirements. Finally, Article 50(6) AI Act addresses the interaction between Article 50 and requirements applicable to high-risk AI systems under the AI Act and with other transparency obligations laid down in Union or national law for deployers of AI systems.

Pursuant to Article 96(1)(d) AI Act, the Commission shall issue guidelines on the practical implementation of transparency obligations laid down in Article 50 AI Act. Pursuant to Article 50(7) AI Act, the AI Office will encourage and facilitate the drawing up of codes of practice to facilitate the effective implementation of the obligations regarding the detection and labelling of artificially generated or manipulated content.

The purpose of the present targeted stakeholder consultation is to collect input from a wide range of stakeholders to inform the Commission guidelines and a Code of Practice on the detection and labelling of artificially generated or manipulated content. These topics will relate to specific practical examples on how the transparency requirements can be implemented, including issues that may require clarification whether they fall under the scope of Article 50 AI Act and under what conditions, information on state-of-the-art transparency and disclosure practices or other conceptual clarifications.

Since not all questions may be relevant for all stakeholders, respondents may reply only to the section(s) and the questions they deem relevant. Respondents are encouraged to provide specific, concise and concrete **explanations and concrete use cases**.

The consultation is available in **English only** and will be open for **4 weeks until 2 October 2025, 23:59 CET**.

**The questionnaire for this consultation is structured along 5 sections with several questions.** Respondents may choose to provide answers only to some sections or only to some questions to which they wish to reply within the sections.

The sections of the survey are as follows:

**Section 1.** Questions in relation to Article 50(1) AI Act

*This section includes questions on the concept of interactive AI systems, the applicable exception in case the direct interaction with persons could be considered obvious, their use for law enforcement activities and practical ways to design the systems in a way that individuals are notified about the interaction with AI systems.*

**Section 2.** Questions in relation to Article 50(2) AI Act

*This section includes questions related to the concept of synthetic content generating or manipulating AI systems, the applicable exceptions to marking AI-generated or manipulated content, their use for law enforcement activities, existing state-of-the-art technical solutions for marking and detecting AI-generated or manipulated content and the criteria for the assessment of marking techniques.*

**Section 3.** Questions in relation to Article 50(3) AI Act.

*This section includes questions on the concept of exposure to emotion recognition and biometric categorisation systems, their use for law enforcement activities and practical ways to inform natural persons of the operation of the system.*

**Section 4.** Questions in relation to Article 50(4) AI Act.

*First, this section includes questions related to the concept of deep fake generating AI systems, the concept of evidently artistic, creative, satirical, fictional or analogous works or programmes, the system's use for law enforcement activities and best practices for disclosing the artificially generated or manipulated origin of deep fakes (including when part of artistic or creative works) Second, the section includes questions related to the concept of AI systems generating or manipulating text published for the purpose of informing the public on matters of public interest, the applicable exception in case the text is subject to human review or editorial control and a natural or legal person holds editorial responsibility, the exempted use for law enforcement activities and best practices for informing the public about the artificially generated or manipulated origin of such content.*

**Section 5.** Other horizontal questions in relation to the implementation of Article 50 AI Act.

*This section covers a set of questions that relate to horizontal issues regarding Article 50 AI Act. First, it addresses the requirements from Article 50 (5) AI Act which apply horizontally when providing the information as required by paragraphs 1-4 of Article 50. Second, the section addresses Article 50(6) and the interplay between AI Act's requirements from Article 50(1)-(5) and other transparency obligations of the AI Act or other Union or national legislation. Finally, it also asks for recommendations and good practices for the Code of Practice.*

**All contributions to this consultation may be made publicly available.** Therefore, please do not share any confidential information in your contribution. Individuals can request to have their contribution anonymised.

**The AI Office will publish a summary of the results of the consultation.** Results will be based on aggregated data and respondents will not be directly quoted.

**INTRODUCTORY SECTION - INFORMATION ABOUT THE RESPONDENT**

1. Do you represent an organisation (e.g., think tank or civil society/consumer organisation,, provider or deployer of an AI system) or act in your personal capacity (e.g., independent expert or from a provider/deployer)? \*
  - Organisation
  - In a personal capacity

2. If you are representing an organisation, please specify the name of the organisation:  
[text]
3. First name \*[text]
4. Surname \*[text]
5. E-Mail address \*[text]
6. Should your contribution be anonymised in the instance that all contributions are made publicly available? \*

***If you act in your personal capacity:*** All contributions to this consultation may be made publicly available. You can choose whether you would like your details to be made public or to remain anonymous. The respondent category that you selected for this consultation, your answer regarding residence, and your contribution may be published as received. Should you choose to remain anonymous, your name will not be published. Please do not include any personal data in the contribution itself.

***If you represent one or more organisations:*** All contributions to this consultation may be made publicly available. You can choose whether you would like respondent details to be made public or to remain anonymous. Only the following organisation details may be published: The respondent category that you selected for this consultation, the name of the organisation on whose behalf you reply as well as its size, its presence in or outside the EU and your contribution as received. Should you choose to remain anonymous, your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

- Yes, please anonymise my contribution.
  - No
7. Do you agree that we may contact you in the event of follow-up questions or if we want to learn more about your responses? \*
    - Yes
    - No
  8. [single-choice] Is your organisation headquartered/Are you residing in the EU? \*
    - Yes --> select dropdown EU27
    - No --> select dropdown from country list
  9. [single-choice] If you selected “No” above and you are representing an organisation, do you have an office or other kind of representation in the EU? \*
    - Yes, we have a subsidiary, branch office or similar in the --> select dropdown EU27
    - Yes, other --> Please specify \_\_\_\_\_
    - No
  10. [single-choice] What is the size of your organisation, if applicable? \*
    - Micro (0-9 employees)
    - Small (10-49 employees)
    - Medium (50-249 employees)

- Small Mid-Cap (250-499 employees)
  - Large (500 or more employees)
  - Other (e.g. multiple organisations): please specify \_\_\_\_\_
11. [single-choice] Which stakeholder category would you consider yourself in? If more than one category is applicable, please select the category that is best applicable in your situation / from the capacity you are responding.\*
- Deployer of an AI system
  - Provider of a generative AI model
  - Provider of an AI system
  - Provider of transparency techniques
  - Other operators (e.g. distributor, importer)
  - Persons interacting with or exposed to AI systems and their outputs
  - Rightholders
  - Business association
  - Academia
  - Other independent expert or organisation with relevant expertise
  - Civil society organisation
  - Supervisory authority
  - Others (please specify \_\_\_\_\_)
12. [multiple-choice] In which sector do you operate? \*
- Information technology
  - Public administration
  - Law enforcement
  - Justice sector
  - Legal services sector
  - Civil society and non-profit organisations
  - Security
  - Cultural and creative sector
  - Media
  - Healthcare
  - Employment
  - Education and training
  - Consumer goods or services
  - Business services
  - Banking and finance
  - Manufacturing
  - Energy
  - Transport
  - Telecommunications
  - Retail
  - E-commerce
  - Advertising
  - Other (please specify \_\_\_\_\_)
13. Please briefly describe the activities of your organisation or yourself:
- Specify: \_\_\_\_\_ (max. 200 words).

14. [multiple-choice] In which part(s) of the public consultation are you interested to contribute to? [depending on the result, respondents shall be asked in the next step to answer the questions relevant for them] [multiple answers are possible]
- Section 1
  - Section 2
  - Section 3
  - Section 4
  - Section 5

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## SECTION 1. QUESTIONS IN RELATION TO ARTICLE 50(1) AI ACT

*Article 50(1) AI Act targets providers of interactive AI systems, notably systems that are intended to interact directly with natural persons. Providers should ensure that such systems are designed and developed in such a way that the natural persons concerned are informed that they are interacting with an AI system.*

*Recital 132 AI Act clarifies that when implementing the transparency obligation for interactive AI systems, the characteristics of natural persons belonging to vulnerable groups due to their age or disability should be taken into account to the extent the AI system is intended to interact with those groups. Article 50(5) AI Act furthermore requires that the information shall be provided to the natural persons concerned in a clear and distinguishable manner at the latest at the time of the first interaction or exposure. In addition, such information shall conform to the applicable accessibility requirements. Regarding the latter, recital 132 confirms that such information and notifications should be provided in accessible formats for persons with disabilities.*

*Article 50(1) AI Act exempts providers from this obligation if the interaction with the AI system can be considered obvious from the point of view of a natural person who is reasonably well-informed, observant and circumspect, taking into account the circumstances and the context of use.*

**Question 1.** Please provide practical examples of AI systems that directly interact with natural persons, as well as examples for which there is doubt and you would seek clarification or consider out of scope.

For each AI system, determine whether the interaction with the AI system can be considered obvious from the point of view of a natural person who is reasonably well-informed, observant and circumspect. Consider in your answer how this interaction may be affected by the characteristics of natural persons belonging to vulnerable groups due to their age or disability.

Name and description of the system	Is the AI system intended to interact directly with natural persons?	Motivate your answer [max 500 characters]	Specify if the interaction with the AI system can be considered obvious as specified in Article 50(1)?	Motivate your answer and provide practical example(s) of such circumstances and context of use [max 500 characters]
Free text	<input type="checkbox"/> Yes <input type="checkbox"/> Not sure <input type="checkbox"/> No	Free text	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure	Free text

			<input type="checkbox"/> Depends on the circumstances and context	
...				

*Furthermore, the transparency obligation under Article 50(1) AI Act does not apply if the interactive AI system is authorised by law to detect, prevent, investigate, or prosecute criminal offences, subject to appropriate safeguards for the rights and freedoms of third parties unless those systems are available for the public to report a criminal offence.*

**Question 2.** Please provide practical examples of AI systems that directly interact with natural persons and that can be authorised by law to detect, prevent, investigate, or prosecute criminal offences. For each system, provide the law that can authorise the use and describe appropriate safeguards for the rights and freedoms of third parties.

If you are aware of any AI systems available for the public to report criminal offences, please include them in your response.

Name and description of the system	Provide the law that can authorise the use to detect, prevent, investigate, or prosecute criminal offences and describe the appropriate safeguards [max 500 characters]	Is the AI system available for the public to report a criminal offence?	Motivate your answer [max 500 characters]
<i>Free text</i>	<i>Free text</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure	<i>Free text</i>
...	....	....	....

**Question 3.** If you are aware of any examples of notification techniques that can be employed with interactive AI systems, including embedded in their design, to duly inform natural persons that they are interacting with an AI system, please provide them in your response.

For each notification technique, determine whether the type and the content of the technique used for notifying a natural person is appropriate, including considering the characteristics of natural persons belonging to vulnerable groups due to their age or disability, the need for a clearly distinguishable and accessible manner and the timing of the notification.

Description of the notification technique	Determine whether the type and the content of the technique used for notifying a natural person is appropriate	Motivate your answer and, where available, provide practical examples with links and further information [max 500 characters]
	<input type="checkbox"/> Appropriate <input type="checkbox"/> Not appropriate <input type="checkbox"/> Not sure <input type="checkbox"/> Depends on the circumstances and context	<i>Free text</i>
	....	...

**Question 4.** Are there aspects related to the scope or practical implementation of the transparency obligation for interactive AI systems under Article 50(1) for which you would seek further clarification?

☐ No

☐ Yes – please specify

[max 500 characters]

## SECTION 2. QUESTIONS IN RELATION TO ARTICLE 50(2) AI ACT

*Article 50(2) AI Act targets providers of AI systems, including general-purpose AI systems, capable of generating synthetic text, audio, image, and video content. Providers of such systems are required to employ technical solutions to ensure that the outputs of their systems are marked in a machine-readable format and enable detection that the content has been generated or manipulated by an AI system and not a human (see also recital 133).*

*AI systems that perform an assistive function for standard editing or that do not substantially alter the input data provided by the deployer or the semantics thereof are exempt from this obligation. Furthermore, Article 50(2) AI Act does not apply if the generative AI system is authorised by law to detect, prevent, investigate, or prosecute criminal offences.*

**Question 5.** Please provide practical examples of AI systems that generate synthetic text, audio, image, or video content as well as examples of systems for which there is doubt and you would seek clarification or consider them out of scope.

If you are aware of any AI systems that may fall under one or more of the exceptions of Article 50(2), such as AI systems that perform an assistive function for standard editing or that do not substantially alter the input data or the semantics thereof, or systems that can be authorised by law for law enforcement purposes, please include them in your response.

Name and description of the system	Is the AI system generating or manipulating synthetic audio, image, video or text content?	Motivate your answer, including whether and why the content should be considered synthetic [max 500 characters]	Does the AI system fall within one or more of the exceptions of Article 50(2)?	Motivate your answer and provide practical examples(s). For the law enforcement exemption provide the law that can authorise the use and describe if it includes any appropriate safeguards [max 500 characters]
Free text	<input type="checkbox"/> Yes <input type="checkbox"/> Not sure <input type="checkbox"/> No	Free text	<input type="checkbox"/> Yes – the system performs primarily an assistive function for standard editing <input type="checkbox"/> Yes – the system does not substantially alter the input data provided by the deployer or the semantics thereof <input type="checkbox"/> Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences. <input type="checkbox"/> No <input type="checkbox"/> Not sure <input type="checkbox"/> Depends on the circumstances and context	Free text
...	.....			



*Article 50(2) AI Act specifies that the technical marking and detection solutions implemented by the provider should be effective, interoperable, robust and reliable as far as this is technically feasible taking into account the specificities and limitations of various types of content, the costs of implementation and the generally acknowledged state of the art, as may be reflected in relevant technical standards.*

*Recital 133 AI Act gives examples of such marking techniques based on watermarks, metadata identifications, cryptographic methods for proving provenance and authenticity of content, logging methods, fingerprints, or a combination of such techniques. Furthermore, Recital 133 also clarifies that such techniques and methods can be implemented at the level of the AI system or at the level of the AI model, including general-purpose AI models generating content, thereby facilitating fulfilment of this obligation by the downstream provider of the AI system. Recital 133 also clarifies that the detection methods can be made accessible, as appropriate, to enable the public to effectively distinguish AI-generated content.*

**Question 6.** Please provide examples of marking and detection solutions, including combinations of techniques, that can be employed to mark in a machine-readable format AI-generated or manipulated content and enable detection whether the content has been generated or manipulated by AI.

Technology's name	Type of solution, one or combination of multiple techniques	Application field per modality	Technology maturity	Link to the source (e.g. paper, journal)	Concise description of the technique and how it works, along with its specificities and potential limitations for modalities and costs of implementation if known [max 500 characters]
<i>Free text</i>	<input type="checkbox"/> Watermarks <input type="checkbox"/> Metadata identifications <input type="checkbox"/> Cryptographic methods <input type="checkbox"/> Logging methods <input type="checkbox"/> Fingerprint <input type="checkbox"/> Other	<input type="checkbox"/> Text <input type="checkbox"/> Image <input type="checkbox"/> Audio <input type="checkbox"/> Video <input type="checkbox"/> Multi-modal	<input type="checkbox"/> Early research <input type="checkbox"/> Advanced research <input type="checkbox"/> Testing phase <input type="checkbox"/> Beta version <input type="checkbox"/> Recently released on the market <input type="checkbox"/> Limited market adoption <input type="checkbox"/> Wide market adoption	<i>Free text</i>	<i>Free text</i>
...	...	...	...	...	...

**Question 7.** For each of the solutions included in the previous question, please clarify whether there is relevant information that can help you competently assess their effectiveness, interoperability, robustness and reliability as far as this is technically feasible, taking into account the specificities and limitations of various types of content, the costs of implementation and the generally acknowledged state of the art. Please also assess to what extent the detection mechanisms are accessible and enable people exposed to the AI generated or manipulated content to identify its origin.

Technology's name	Assessment based on the criteria below and grade: - N/A (Not known/not sure) 1. Very low 2. Low 3. Moderate 4. High 5. Very high	Motivate your answer, including by providing sources and further information and evidence that supports the assessment [max 750 characters]
	Effective [grade 1 to 5 or n/a]  Interoperable [grade 1 to 5 or n/a]  Robust [grade 1 to 5 or n/a]  Reliable [grade 1 to 5 or n/a]  Transparent and accessible to people [grade 1 to 5 or n/a]	Free text
	...	...

**Question 8:** Are you aware of technical standards or ongoing standardisation activities relevant in the context of the obligation for generative AI systems in Article 50(2) AI Act?

☐ No

☐ Yes – please specify and provide links and further information  
[max 500 characters]

**Question 9.** Are there any other aspects related to the scope or the practical implementation of the transparency obligation for generative AI systems under Article 50(2) for which you would seek clarification?

☐ No

☐ Yes – please specify  
[max 500 characters]

### SECTION 3. QUESTIONS IN RELATION TO ARTICLE 50(3) AI ACT

*Article 50(3) AI Act requires deployers of emotion recognition systems or biometric categorisation systems to inform the natural persons exposed thereto of the operation of the system. This obligation does not apply if the system is permitted by law to detect, prevent or investigate criminal offences, subject to appropriate safeguards for the rights and freedoms of third parties, and in accordance with Union law.*

*The concepts of emotion recognition and biometric categorisation systems are defined by, respectively, Article 2(39) and (40) AI Act and have been clarified in the Commission Guidelines on Prohibited Artificial Intelligence Practices [\[insert link\]](#).*

*Article 50(5) AI Act furthermore requires that the information shall be provided to the natural persons concerned in a clear and distinguishable manner at the latest at the time of the first interaction or exposure. In addition, such information shall conform to the applicable accessibility requirements. Regarding the latter, recital 132 confirms that such information and notifications should be provided in accessible formats for persons with disabilities.*

**Question 10.** Please provide practical examples of AI systems that may be considered emotion recognition and biometric categorisation systems.

If you are aware of any such systems that can be authorised by law to detect, prevent or investigate criminal offences, please include them in your response. For each of these systems, provide the law that can authorise their use and describe the appropriate safeguards for the rights and freedoms of third parties.

Name and description of the system	Is the AI system an emotion recognition system or a biometric categorisation system to which natural persons are exposed?	Motivate your answer [max 500 characters]	Is the AI system authorised by law to detect, prevent or investigate criminal offences?	If yes, describe the law that can authorise the use of the system and the appropriate safeguards [max 500 characters]
<i>Free text</i>	<input type="checkbox"/> Yes, the system is emotion recognition system <input type="checkbox"/> Yes, the system is biometric categorisation system <input type="checkbox"/> Not sure <input type="checkbox"/> No	<i>Free text</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure	<i>Free text</i>

**Question 11.** If you are aware of any examples of transparency measures that can be employed with emotion recognition or biometric categorisation systems to duly inform natural persons exposed thereto of the operation of the system, please provide them in your response.

For each transparency measure, determine whether the type and the content of the measure used for informing the natural person of the operation of the system is appropriate, including as regards the need for a clearly distinguishable and accessible manner and the timing of the notification.

Description of the transparency measure	Determine whether the type and the content of the measure used for informing the natural person of the operation of the system is appropriate	Motivate your answer and, where available, provide practical examples with links and further information [max 500 characters]
	<input type="checkbox"/> Appropriate <input type="checkbox"/> Not appropriate <input type="checkbox"/> Not sure	<i>Free text</i>
	...	...

**Question 12.** Are there any other aspects related to the scope or the practical implementation of the transparency requirement for emotion recognition and biometric categorisation systems for which you would seek clarification?

- ☐ No  
☐ Yes – please specify  
 [max 500 characters]

#### SECTION 4. QUESTIONS IN RELATION TO ARTICLE 50(4) AI ACT

*Article 50(4), subparagraph 1, AI Act requires deployers of AI systems generating or manipulating image, audio or video content constituting a deep fake to disclose that the content has been artificially generated or manipulated. The definition of a deep fake is provided in Article 3(60) AI Act, which defines ‘deep fakes’ as AI-generated or manipulated image, audio, or video content that resembles existing persons, objects, places, entities, or events and would falsely appear to a person as authentic or truthful.*

*If the deep fake content forms part of an evidently artistic, creative, satirical, fictional or analogous work or programme, the transparency requirement is limited to the disclosure of the existence of such generated or manipulated content in an appropriate manner that does not hamper the display or enjoyment of the work.*

*The transparency obligation in Article 50(4), subparagraph 1, does not apply if the AI system is authorised by law to detect, prevent, investigate, or prosecute criminal offences.*

**Question 13.** Please provide practical examples of generative AI systems that produce ‘deep fake’ AI-generated or manipulated image, audio, or video content that resembles existing persons, objects, places, entities, or events and would falsely appear to a person as authentic or truthful.

If you are aware of any AI systems for which the deep fake content may be considered to form part of an evidently artistic, creative, satirical, fictional or analogous work or programme, please include them in your response.

Name and description of the system	Is the AI system generating or manipulating image, audio or video content constituting a deep fake?	Motivate your answer [max 500 characters]	Can the deep fake content form part of an evidently artistic, creative, satirical, fictional or analogous work or programme?	Motivate your answer and provide practical example(s) [max 500 characters]
Free text	<input type="checkbox"/> Yes <input type="checkbox"/> Not sure <input type="checkbox"/> No	Free text	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure <input type="checkbox"/> Depends on the circumstances and context	Free text

**Question 14.** Please provide practical examples of AI-generated or manipulated content for which you would seek clarification regarding its classification as a ‘deep fake’.  
[max 400 characters]

**Question 15.** If you are aware of any generative AI systems producing deep fakes that can be authorised by law to detect, prevent or investigate criminal offences, please provide practical examples thereof in your response. For each of these systems, provide the law that can authorise the use and if it includes any appropriate safeguards for the rights and freedoms of third parties.

Name and description of the system	Is the AI system generating or manipulating image, audio or video content constituting a deep fake and which can be authorised by law to detect, prevent, investigate, or prosecute criminal offences?	If yes, describe the law that can authorise the use of the AI system for law enforcement purposes and if it includes any appropriate safeguards [max 500 characters]
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Free text	<input type="checkbox"/> Yes <input type="checkbox"/> Not sure <input type="checkbox"/> No	Free text

*Recital 134 clarifies that deployers of AI systems generating deep fake content should clearly and distinguishably disclose that it has been artificially created or manipulated by labelling the output accordingly and disclosing its artificial origin. Regarding deep fake content that is part of evidently creative, satirical, artistic, fictional or analogous works or programmes, that recital clarifies that disclosure of the existence of such generated or manipulated deep fake content should occur in an appropriate manner that does not hamper the display or enjoyment of the work, including its normal exploitation and use, while maintaining the utility and quality of the work.*

*Article 50(5) AI Act furthermore requires that the information shall be provided to the natural persons concerned in a clear and distinguishable manner at the latest at the time of the first interaction or exposure. In addition, such information shall conform to the applicable accessibility requirements. Regarding the latter, recital 132 confirms that such information and notifications should be provided in accessible formats for persons with disabilities.*

**Question 16.** If you are aware of any examples of disclosure practices that can be employed with deep fake content to duly disclose the artificially generated or manipulated origin of such content to natural persons exposed thereto, please provide them in your response.

For each disclosure practice, determine whether the type and the content of the disclosure practice is appropriate for clearly, distinguishably and accessibly informing natural persons about the artificially generated or manipulated origin of the content and the timing of the notification.

In cases where the disclosure practice is used on deep fake content that forms part of an evidently creative, satirical, artistic, fictional or analogous work or programme, determine whether the disclosure is done in an appropriate manner that does not hamper the display or enjoyment of the work.

Description of the disclosure practice	Specify to which type of deep fake it applies	Determine whether the type and the content of the disclosure practice is appropriate for clearly, distinguishably and accessibly informing natural persons	Motivate your answer and, where available, provide practical examples with links and further information [max 500 characters]	For deep fake content part of evidently creative satirical, artistic, fictional or analogous works determine whether the disclosure does not hamper the display or enjoyment of the work	Motivate your answer and provide practical example(s) [max 500 characters]
	<input type="checkbox"/> Audio <input type="checkbox"/> Image <input type="checkbox"/> Video <input type="checkbox"/> Not sure	<input type="checkbox"/> Appropriate <input type="checkbox"/> Not appropriate <input type="checkbox"/> Not sure	Free text	<input type="checkbox"/> Hampers the display or enjoyment <input type="checkbox"/> Does not hamper the display or enjoyment <input type="checkbox"/> Not sure <input type="checkbox"/> Not applicable	Free text
		...	...	...	...

*Article 50(4), subparagraph 2, AI Act requires deployers of AI systems generating or manipulating text published with the purpose of informing the public on matters of public interest to disclose that the content has been artificially generated or manipulated.*

*This obligation does not apply if the AI system is authorised by law to detect, prevent, investigate, or prosecute criminal offences or where the AI-generated content has undergone a process of human review or editorial control and a natural or legal person holds editorial responsibility for the publication of the content.*

**Question 17.** Please provide practical examples of AI systems generating or manipulating text published with the purpose of informing the public on matters of public interest, including by providing examples of such publications.

If you are aware of any AI systems that may fall under one or more of the exceptions, such as AI systems for which the AI-generated or -manipulated text has undergone human review or editorial control and where a natural or legal person holds editorial responsibility for the publication of the content, or the use can be authorised by law to detect, prevent, investigate, or prosecute criminal offences, please include them in your response. If applicable, provide the law that can authorise the use for law enforcement purposes.

Name and description of the system	Is the AI system generating or manipulating text published with the purpose of informing the public on matters of public interest?	Motivate your answer, including as regards the type of the publication [max 500 characters]	Does the AI system fall within one or more of the exceptions of Article 50(4) subparagraph 2?	Motivate your answer and provide practical example(s). For the law enforcement exemption provide the law that can authorise the use and describe appropriate safeguards [max 500 characters]
Free text	<input type="checkbox"/> Yes <input type="checkbox"/> Not sure <input type="checkbox"/> No	Free text	<input type="checkbox"/> Yes – human review or editorial control is guaranteed, and there is a person holding editorial responsibility for the publication <input type="checkbox"/> Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences <input type="checkbox"/> No <input type="checkbox"/> Not sure <input type="checkbox"/> Depends on the circumstances and context	Free text

**Question 18.** Please provide practical examples of AI-generated or -manipulated textual content<sup>2</sup> for which you would seek clarification regarding whether or not such content is

<sup>(2)</sup> Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act).

published with the purpose of informing the public about matters of public interest, or whether or not such content has undergone human review or editorial control.  
[max 400 characters]

**Question 19.** If you are aware of any examples of disclosure practices that can be employed for AI-generated or manipulated text published with the purpose of informing the public on matters of public interest to duly disclose the artificially generated or manipulated origin of the publication to natural persons exposed thereto, please provide them in your response.

For each disclosure practice, determine whether the type and the content of the disclosure practice is appropriate for clearly, distinguishably and accessibly informing natural persons about the artificially generated or manipulated origin of the publication and the timing of the notification.

Description of the disclosure practice	Determine whether the type and the content of the disclosure practice is appropriate for clearly, distinguishably and accessibly informing natural persons	Motivate your answer and provide and, where available, provide practical examples with links and further information [max 500 characters]
	<input type="checkbox"/> Appropriate <input type="checkbox"/> Not appropriate <input type="checkbox"/> Not sure <input type="checkbox"/> None	<i>Free text</i>
	...	...

**Question 20.** Are there any other aspects related to the scope or the practical implementation of the transparency requirement for deployers of AI systems that generate deep fakes and text publications on matters of public interest under Article 50(4) for which you would seek clarification?

- ☐ No  
☐ Yes – please specify  
 [max 500 characters]

## SECTION 5. HORIZONTAL QUESTIONS IN RELATION THE IMPLEMENTATION OF ARTICLE 50 AI ACT.

*Article 50(5) AI Act requires that the information to be provided under the various transparency requirements from Article 50 shall be provided to the natural persons concerned in a clear and distinguishable manner at the latest at the time of the first interaction or exposure. In addition, such information shall conform to the applicable accessibility requirements. Regarding the latter, recital 132 confirms that such information and notifications should be provided in accessible formats for persons with disabilities.*

**Question 21.** Are there aspects related to the AI Act’s horizontal requirements in Article 50(5), including their interplay with the requirements in Article 50(1)–(4), for which you would seek clarification?

- ☐ No  
☐ Yes – please specify  
 [max 500 characters]

*Article 50(6) AI Act states that paragraphs 1 to 4 of Article 50 shall not affect the requirements and obligations set out in Chapter III of the AI Act (i.e. the chapter containing the rules applicable to high-risk AI systems) and shall be without prejudice to other transparency obligations for deployers of AI systems under other Union or national law.*

**Question 22.** Are there any further aspects related to the transparency obligations under Article 50(1)-(5) for which you would seek clarification regarding their interplay with other obligations in the AI Act?

☐ Yes [please specify which aspects require clarification and point to specific provisions in the AI Act] [max 500 characters]

☐ No

**Question 23.** Are there any further aspects related to the transparency obligations under Article 50(1)-(5) for which you would seek clarification regarding their interplay with obligations in other Union or national legislation (e.g. data protection regulation such as Regulations (EU) 2016/679 and (EU) 2018/1725 and Directive (EU) 2016/680, Regulation (EU) 2024/900 on the transparency and targeting of political advertising or Regulation (EU) 2022/2065 on a Single Market For Digital Services)?

☐ Yes [please specify which specific aspects require clarification and point to specific provisions in Union or national legislation] [max 500 characters]

☐ No

**Question 24.** Are there any recommendations or good practices you would like to share as input for the Code of Practice to operationalise the implementation of the transparency obligations regarding interactive and generative AI systems?

☐ No

☐ Yes – please specify  
[max 750 characters]

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