

GPAI-Specific Requirements by Jurisdiction

Summary by:

Ito Onojeghuo | LLM, C-DPO, FIP, AIGP, CIPM, CIPP/E.

CEO, ALLNET Law



Jurisdiction & Instrument	Documentation & Transparency	Registration / Filing / Representative	Incident / Risk Reporting	Red-Teaming / Adversarial Testing	Energy / Compute Disclosure	Watermarking / Output Labelling	Binding Status
EU — AI Act <i>Chapter V (GPAI models)</i>	Yes Art. 53: technical documentation, training-data summary, downstream transparency (model cards, usage conditions, limitations). Art. 50 transparency: tell people when they are interacting with AI; disclose deepfakes and AI-generated public-interest text. <i>Dates: GPAI duties apply since 2 Aug 2025 (Commission enforcement powers from 2 Aug 2026; models on the market before 2 Aug 2025 have until 2 Aug 2027). Art. 50 duties apply from 2 Aug 2026.</i>	Partial No separate GPAI filing regime in source, but providers established outside the EU must appoint an EU representative.	Yes Systemic-risk models only — document and report serious incidents.	Yes Required for systemic-risk models — red-teaming / adversarial testing.	Yes Systemic-risk models must disclose energy consumption.	Yes Art. 50(2): providers of AI systems, including general-purpose AI systems, that generate synthetic audio, image, video or text must mark outputs in a machine-readable, detectable format. Deployers must also disclose deepfakes (Art. 50(4)). <i>Dates: applies from 2 Aug 2026 to systems placed on the market on or after that date; 2 Dec 2026 for generative systems already on the market before 2 Aug 2026 (Digital Omnibus, Reg. (EU) 2026/1744, in force 27 Jul 2026).</i>	Regulatory Binding EU law.
United States — Colorado <i>AI Act (SB 24-205), effective 2026</i>	Yes GPAI developers whose models are integrated into “consequential decision” tools must provide documentation to deployers.	No No GPAI-specific registration regime identified in source.	Yes Must disclose known risks of algorithmic discrimination to the Colorado Attorney General and to deployers.	N/A Not specified in source.	N/A Not specified in source.	N/A Not specified in source.	Regulatory Binding state law.
United States — California <i>AB 2013 / SB 942, 2025–2026</i>	Yes GPAI / foundation-model providers must publish training-data transparency reports.	N/A Not specified in source.	N/A Not specified in source.	Partial Must implement testing and disclosure frameworks for large-scale GPAI (not framed explicitly as “red-teaming” in source).	N/A Not specified in source.	Yes Must provide watermarking / detection tools for audio and visual outputs.	Regulatory Binding state law.
United States — NIST AI RMF <i>(cross-sector reference framework)</i>	Voluntary Nonbinding, but widely referenced in federal/state procurement, encouraging risk management, documentation and transparency for GPAI.	N/A Not a filing/registration regime.	N/A Not specified as a mandatory duty in source.	N/A Not detailed in source.	N/A Not specified in source.	N/A Not specified in source.	Voluntary Nonbinding framework.
South Korea — AI Basic Act <i>Effective 22 January 2026</i>	Yes Life-cycle risk-management plan and documentation; transparency to downstream deployers and end users.	Yes Foreign GPAI developers above set thresholds must appoint a domestic representative in South Korea.	Partial General high-impact AI safety/incident duties apply; source does not detail a GPAI-specific incident-reporting duty.	No Not specified as a distinct GPAI duty in source; general safety and reliability measures are required.	N/A Not specified in source.	N/A Not specified in source.	Regulatory Binding national law.
China <i>2023 Interim Measures for Generative AI Services</i>	Partial Content must comply with legal/policy standards; framed as content governance rather than the EU-style transparency documentation.	Yes Must file systems with the Cyberspace Administration of China (CAC) and undergo a security/safety assessment before public release.	Yes Must monitor and rectify risks, and report material changes or incidents.	N/A Not specified in source.	N/A Not specified in source.	Yes Must label and watermark outputs under the deep-synthesis rules.	Regulatory Binding national regime.
Japan — AI Guidelines v1.1 <i>(2025)</i>	Voluntary Encourages providers to maintain documentation and logs, disclose model capabilities/limitations, and share information with downstream deployers.	N/A Not specified in source.	N/A Not specified as a mandatory duty in source.	N/A Not specified in source.	N/A Not specified in source.	N/A Not specified in source.	Voluntary Nonbinding but influential soft law.

Reading the Table

- **The EU AI Act is presently the only regime with GPAI duties tied explicitly to red-teaming and energy disclosure** — and only for models designated as carrying “systemic risk” (very large models above compute thresholds).
- **Registration/filing looks different in every jurisdiction:** the EU requires an appointed representative for non-EU providers, South Korea requires a domestic representative above certain thresholds, and China requires an affirmative pre-release filing and security assessment with the Cyberspace Administration of China (CAC). Colorado and California do not impose a GPAI-specific registration duty in this material.
- **Watermarking/output labelling is explicit in the EU (Art. 50(2)), China and California**, but not detailed as a GPAI-provider duty for Colorado, South Korea, or Japan. In the EU, marking of synthetic outputs applies from 2 Aug 2026 (2 Dec 2026 for generative systems already on the market before that date).
- **Japan and the U.S. NIST AI RMF are both voluntary**, relying on encouragement and procurement leverage rather than statutory penalties.