



EU AI Act Milestone: General Purpose AI Obligations just came into force

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Understanding the EU AI Act in a page

	Provider	Deployer	Importer	Distributor	Obligations
					
Prohibited AI	Y	Y	Y	Y	Prohibited
High Risk AI	Y	Y	Y	Y	Must undergo a conformity assessment
Limited Risk AI	Y	Y	N	N	Must adhere to transparency requirements
Low Risk AI	N/A	N/A	N/A	N/A	No obligations – Subject to codes of conduct
GPAI	Y	N	N	N	Subject to GPAI-specific requirements



GPAI Definitions

GPAI Models

Models trained on **large-scale data** (often via self-supervision) that can competently **perform many distinct tasks** and be integrated into various applications.

(AI models that are used for research, development or prototyping activities before they are placed on the market are excluded.)

Indicative threshold → Training compute greater than 10^{23} FLOP

→ Can generate **text, audio, images, or video**



GPAI Models with Systemic Risk

Presumed risk → Training compute greater than 10^{25} FLOP

→ Likely to significantly affect the EU market

Designated risk:

The Commission may also designate GPAI models as having systemic risk based on the criteria in Annex XIII of the AI Act.



Is my model a General Purpose AI model?

A model is trained on natural language data using 10^{22} FLOP and cannot perform many different tasks well.

Although it can generate text, it does not meet the general-purpose AI criteria because:

- Its training compute is below 10^{23} FLOP.
- It lacks the ability to handle a wide range of tasks.

Therefore, it is not considered a general-purpose AI model.





Is my model a General Purpose AI model?

A model is trained using 10^{24} FLOP on a large, diverse set of natural language data from the internet and other sources.

According to definitions and guidelines, this qualifies it as a general-purpose AI model because:

- It exceeds the 10^{23} FLOP training threshold.
- It can **generate text** and **handle many different tasks** due to its broad training data.

Therefore, **the model is likely considered a general-purpose AI model.**



Is my model a General Purpose AI model?

A model is trained with 10^{24} FLOP to transcribe speech to text.

- While it exceeds the 10^{23} FLOP threshold and can generate text, it only performs a narrow task (speech transcription).
- According to guidelines and definitions, this means it is **not** a general-purpose AI model, since it lacks broad capabilities.

Therefore, **the model is not considered general-purpose.**



Obligations for GPAI model providers

GPAI Models



1. **Transparency** over the content used to train the model

2. **Implement policy** to comply with EU copyright law

3. **Produce and maintain technical documentation** to 1) share with the AI Office and national authorities upon request, and 2) make available to downstream providers.

GPAI Models with Systemic Risk



1. Perform **model evaluation** and **adversarial testing** to identify and mitigate systemic risks

•2. **Identify and address systemic risks** at the EU level

3. **Document and report serious incidents** (and corrective actions) to the AI Office and national authorities without delay

4. **Ensure adequate cybersecurity** protection to both the model and its supporting infrastructure

Downstream Modifiers as Providers of GPAI Models

Downstream modifiers = actors who modify or fine-tune an existing GPAI model

These actors **can become providers** of a GPAI model if the modification **significantly changes** the model's **generality, capabilities, or systemic risk**.

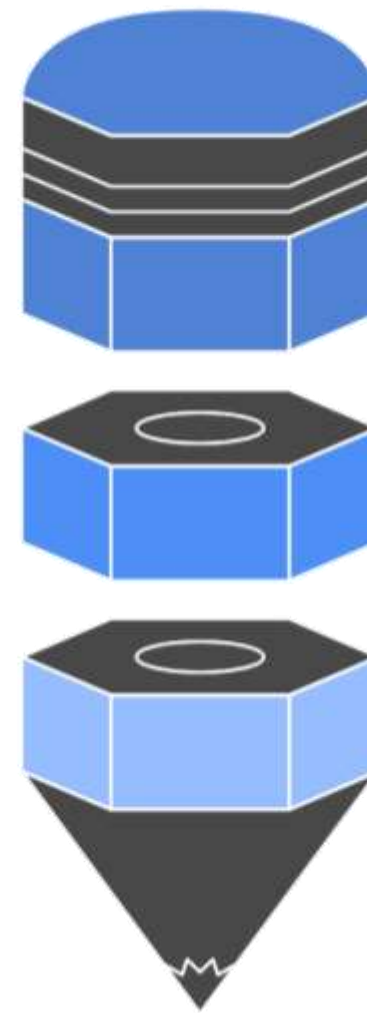
What is a significant change?

= If they use **more than one-third of the compute** used to train the original model.

The threshold is proportional to the size of the original model (to ensure fairness across different model sizes and avoids discouraging the improvement of smaller models.)

If compute information is unknown these substitute thresholds apply:

- **Systemic risk model:** one-third of 10^{25} FLOP
- **Regular GPAI model:** one-third of 10^{23} FLOP



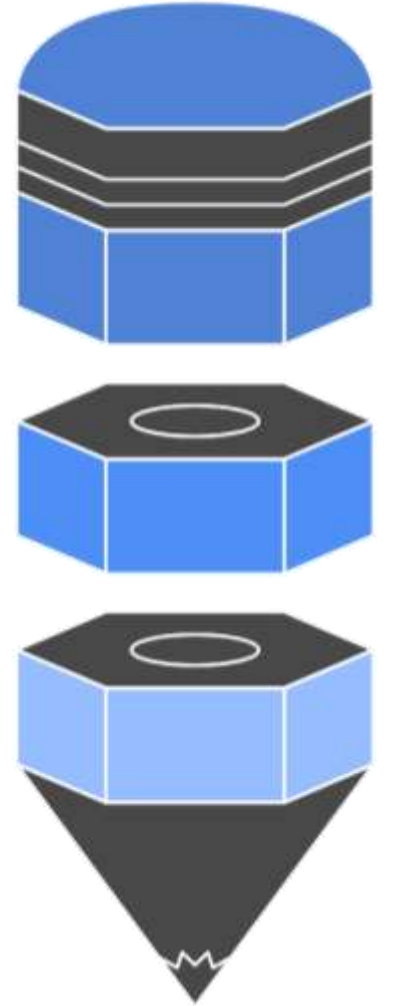
Downstream Modifiers as Providers of GPAI Models

Why does this matter?

Significant modifications may impact transparency, copyright, and systemic risk obligations.

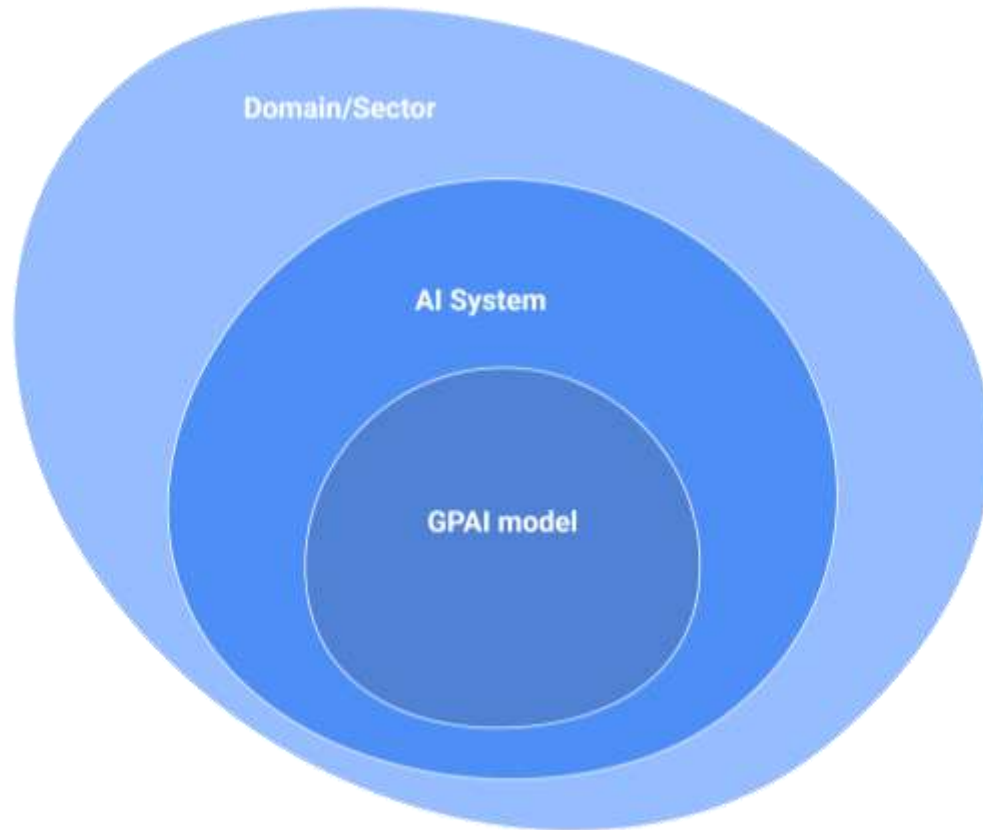
It is a forward-looking approach

- Currently, few modifications are large enough to meet the threshold, but as compute power becomes more available, more downstream actors may qualify as providers under the AI Act.
- The Commission may update the rules over time to reflect changes in technology and the market.



AI models are typically integrated into and form part of AI systems

A GPAI model can be embedded within a larger system categorized as a high-risk AI system.



- **GPAI model:** A model like GPT-4, used to summarize clinical guidelines.
- **AI system and domain/sector:** A diagnostic decision-support system for doctors.

The **overall system is high-risk**

- **Implication:** The full high-risk AI system must comply with all **high risk AI** obligations
- **The GPAI component still has transparency and documentation obligations** to adhere to under the AI Act.

Timeline for GPAI models



No forced retraining

Models released before August 2nd, 2025 are **not required to retrain** or unlearn content if:

- Retraining is technically or practically impossible
- Training data is unavailable or too burdensome to retrieve

These limitations must be **clearly explained** in the copyright policy and data summary.

For new models (post-2025)

Providers who have trained, are in the process of training, or are planning on training a general-purpose AI model with a view to placing the model on the market after August 2nd, 2025:

- Proactively engage with the AI Office if facing compliance difficulties
- Notify the Commission **within two weeks after August 2nd, 2025** if releasing a model with **systemic risk**.

GPAI Code of Practice

- The **General-Purpose AI Code of Practice** was published on **July 10th, 2025**.
- It is a **voluntary guidance framework** requested by the European Commission and developed by over **1,000 independent experts**.
- Its goal is to support **responsible implementation of the AI Act**, especially for **general-purpose AI models**.

The Code includes three main chapters:

1. Transparency
2. Copyright
3. Safety and Security (*only for models with systemic risk*)

Next Steps and Legal Status

- The Code is now under **legal review** by the AI Office and the AI Board
- If approved, the Commission may issue an **implementing act** to give the Code **general legal validity across the EU**.

Code of Practice for
General-Purpose AI Models

Transparency
Chapter

[The General-Purpose AI Code of Practice | Shaping Europe's digital future](#)



Demonstrating Compliance via the Code of Practice

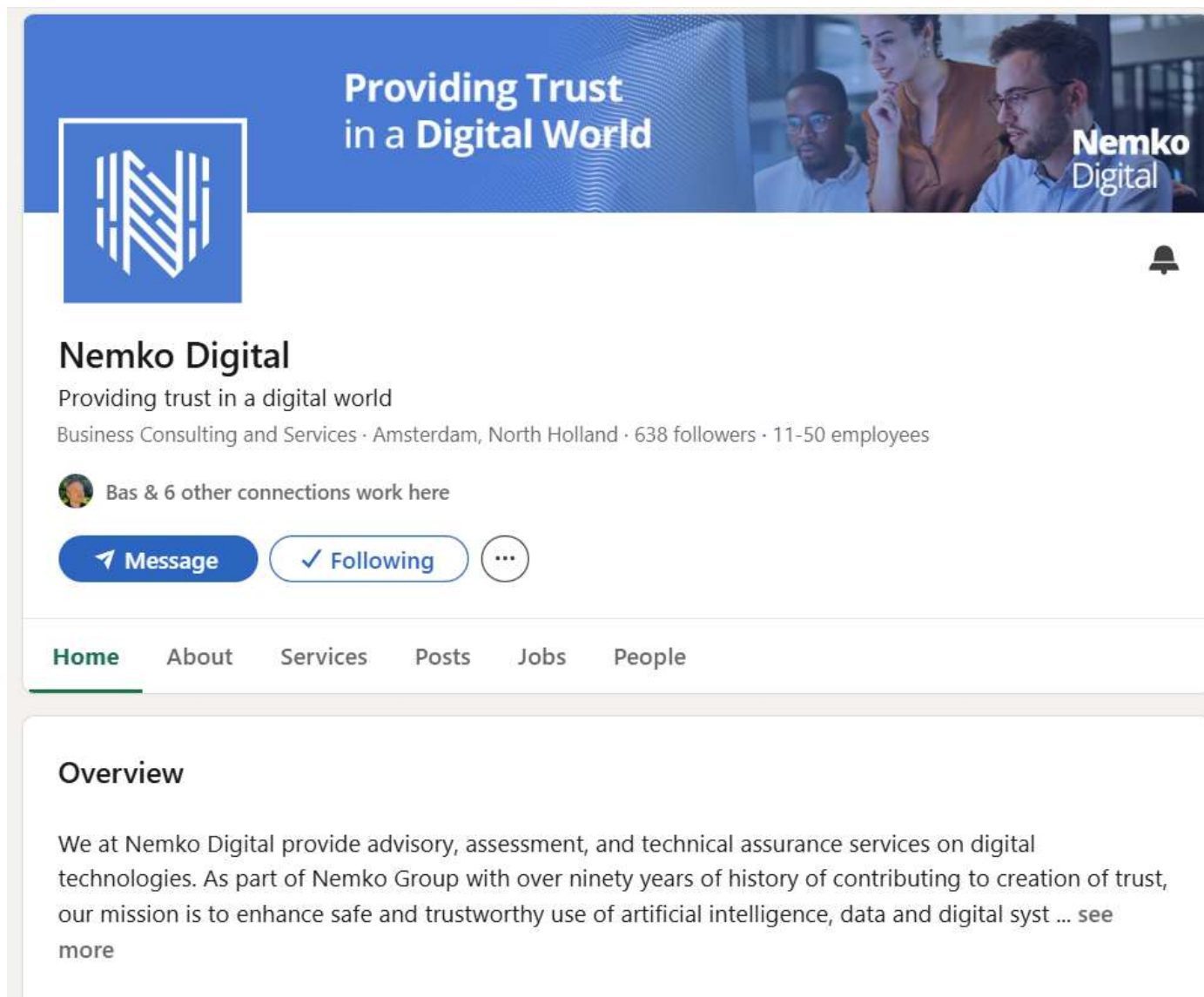
- Providers of general-purpose AI models can show they meet their obligations by following the **code of practice** (once approved by the AI Office and the Board).
- **Opting out** of parts of the code removes the benefits of using it to demonstrate compliance in those areas.
- Providers may also use **other adequate methods**, but following an approved code of practice is the **simplest and most straightforward** path to compliance.

Non-compliance with GPAI model obligations

= EUR 15 million or up to 3 % of global annual turnover



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