

GPAI model	An AI model that <b>“displays significant generality and is capable of competently performing a wide range of distinct tasks”</b> , and that <b>“can be integrated into a variety of downstream systems or applications”</b> , regardless of the way the model is placed on the market (Article 3(63)). GPAI models include models trained with a large amount of data using self-supervision at scale, and the Act considers models trained in this manner with at least a billion parameters to be GPAI (Recital 98). The Act also considers that large generative AI models are a typical example of GPAI models (Recital 99). There is an exception for AI models that are used for research, development or prototyping activities before they are placed on the market (Article 3(63)).	
GPAI model with systemic risk	A GPAI model is a model with system risk if it has <b>“high impact capabilities”</b> either as <b>“evaluated on the basis of appropriate technical tools and methodologies, including indicators and benchmarks”</b> or <b>“based on a decision of the Commission, ex officio or following a qualified alert from the scientific panel”</b> (Article 51(1)). A GPAI model is presumed to have high impact capabilities making it a GPAI model with systemic risk when <b>“the cumulative amount of computation used for its training measured in floating point operations is greater than 10(^25)”</b> (Article 51(2)). These criteria will be amended and supplemented by the Commission through delegated acts to reflect the state of the art as the technology develops (Article 51(3)). The Commission will publish and keep updated a list of GPAI models with systemic risk (Article 52(6)). There is a process for GPAI model providers whose models meet the relevant criteria to submit arguments to the Commission to demonstrate that the model does not present systemic risks due to its particular characteristics (Article 52).	
Provider of a GPAI model	A provider is a <b>“natural or legal person, public authority, agency or other body that develops ... a general-purpose AI model or that has ... a general-purpose AI model developed and places it on the market ... whether for payment or free of charge”</b> (Article 3(3)). When the developer of a GPAI model integrates the model into its own AI system that is made available on the market or put into service, the model is also considered to be placed on the market for purposes of the Act (Recital 97). Although not explicit in the Act, it seems likely that a person that further develops or fine tunes an existing GPAI model to create a new GPAI model would be considered a provider of the resulting GPAI model. The deadline for compliance with obligations applicable to GPAI providers is <b>2 August 2025</b> . GPAI model providers can ensure compliance with their obligations under the Act by following applicable Codes of Practice or EU harmonised standards, but can also use alternative means of compliance if they are able to demonstrate to the Commission that these are adequate (Article53(4)). The Codes of Practice will be published by the AI Office by <b>1 May 2025</b> .	
Type of GPAI model	Type of duty	Obligations
All GPAI models (with some exceptions in relation to open source models as noted below)	Technical documentation (Article 53(1)(a))	<p>Draw up, keep up to date, and provide to the AI Office or national authorities on request technical documentation for the model, including its training and testing process and the results of its evaluation. This must contain, at a minimum, the following information set out in Annex XI of the Act:</p> <ul style="list-style-type: none"><li>Both a general and a detailed description of the GPAI model, including:<ul style="list-style-type: none"><li>tasks it is intended to perform and type and nature of AI systems in which it can be integrated</li><li>applicable acceptable use policies</li><li>date of release and methods of distribution</li><li>architecture and number of parameters</li><li>modality (e.g. text, image) and format of inputs and outputs</li><li>licence.</li></ul></li><li>Information regarding the process of development of the GPAI model, including:<ul style="list-style-type: none"><li>technical means (e.g. instructions of use, infrastructure, tools) required for the GPAI model to be integrated in AI systems</li><li>design specifications and training process, including training methodologies and techniques, the key design choices including the rationale and assumptions made, what the model is designed to optimise for, and the relevance of the different parameters, as applicable</li><li>information on the data used for training, testing and validation, as applicable, including the type and provenance of data and curation methodologies (e.g. cleaning, filtering etc.), the number of data points, their scope and main characteristics, how the data was obtained and selected, measures to detect the unsuitability of data sources, and methods to detect identifiable biases</li><li>the computational resources used to train the model (e.g. number of floating point operations), training time, and other relevant details related to training</li><li>known or estimated energy consumption of the model.</li></ul></li></ul>
	Instructions for integration into AI systems (Article 53(1)(b))	<p>Draw up, keep up-to-date and make available information and documentation to providers of AI systems who intend to integrate the GPAI model into their AI systems, sufficient to enable providers of AI systems to have a good understanding of the capabilities and limitations of the GPAI model and to comply with their own AI Act obligations. The documentation must contain, at a minimum, the following information set out in Annex XII of the Act:</p> <ul style="list-style-type: none"><li>A general description of the GPAI model, including:<ul style="list-style-type: none"><li>tasks it is intended to perform and type and nature of AI systems in which it can be integrated</li><li>applicable acceptable use policies</li><li>date of release and methods of distribution</li><li>how the model interacts, or can be used to interact, with other hardware or software, where applicable</li><li>the versions of relevant software related to the use of the model, where applicable</li><li>architecture and number of parameters</li><li>modality (e.g. text, image) and format of inputs and outputs</li><li>the licence for the model</li></ul></li><li>A description of the elements of the model and of the process for its development, including:<ul style="list-style-type: none"><li>the technical means (e.g. instructions for use, infrastructure, tools) required for the model to be integrated into AI systems</li><li>the modality (e.g. text, image) and format of the inputs and outputs and their maximum size (e.g. context window length)</li><li>information on the data used for training, testing and validation, as applicable, including the type and provenance of data and curation methodologies.</li></ul></li></ul>
	Policy to comply with EU copyright law (Article 53(1)(c))	<p>Put in place a policy to comply with EU law on copyright and related rights, and in particular to identify and comply with rightsholders reservations of rights ('opt-outs') in relation to the text and data mining exception to copyright and database rights under the Copyright in the Digital Single Market Directive.</p>
	Summary of content used for training (Article 53(1)(d))	<p>Draw up and make publicly available a sufficiently detailed summary about the content used for training of the GPAI model, according to a template provided by the AI Office.</p>
	Authorised representative (Article 54)	<p>Providers of GPAI models established in third countries must, prior to placing a GPAI model on the EU market, appoint an authorised representative which is established in the EU to verify the provider's compliance with obligations, hold copies of documentation, and liaise with the AI Office and national authorities.</p>
GPAI models with systemic risk	Notification to the Commission (Article 52)	<p>Notify the Commission without delay, and in any event within two weeks, where a GPAI model meets the conditions to be a GPAI model with systemic risk or where the provider knows the model will meet these conditions. The notification must include the information necessary to demonstrate that the relevant conditions have been met.</p>
	All obligations applicable to providers of all GPAI models (Articles 53 and 54)	<p>Comply with all obligations applicable to all GPAI model providers. Technical documentation must also contain a detailed description of the following additional information set out in Annex XI:</p> <ul style="list-style-type: none"><li>Evaluation strategies, including evaluation criteria, metrics, and methodology on the identification of limitations, and evaluation results</li><li>Measures put in place for the purpose of conducting internal and/or external adversarial testing (e.g. red teaming), model adaptations, including alignment and fine-tuning</li><li>System architecture, explaining how software components build or feed into each other and integrate into the overall processing.</li></ul>
	Model evaluation and adversarial testing (Article 55(1)(a))	<p>Perform model evaluation in accordance with standardised protocols and tools reflecting the state of the art, including conducting and documenting adversarial testing of the model with a view to identifying and mitigating systemic risks.</p>
	Risk assessment (Article 55(1)(b))	<p>Assess and mitigate possible systemic risks, including their sources, that may stem from the development, the placing on the market, or the use of the model.</p>
	Incident reporting (Article 55(1)(c))	<p>Keep track of, document, and report, without undue delay, to the AI Office and national authorities (as appropriate), relevant information about serious incidents and possible corrective measures to address them.</p>
	Cybersecurity (Article 55(1)(d))	<p>Ensure an adequate level of cybersecurity protection for the model and its physical infrastructure.</p>
Open source GPAI models except open source GPAI models with systemic risk	Certain obligations applicable to providers of all GPAI models (Article 53)	<p>Open source GPAI models except those with systemic risks are exempt from obligations to prepare technical documentation and instructions for integration into AI systems, and to have an EU representative (Articles 53(2) and 54(6)). Providers of open source GPAI models must still comply with obligations to have a policy to comply with EU copyright law and a summary of content used for training.</p> <p>A GPAI model is considered open source for these purposes where it is “released under a free and open-source licence that allows for the access, usage, modification, and distribution of the model, and whose parameters, including the weights, the information on the model architecture, and the information on model usage, are made publicly available” (Articles 53(2) and 54(6)).</p>