



# Provisions on General-Purpose Artificial Intelligence Models Under The EU Artificial Intelligence Act Came Into Effect

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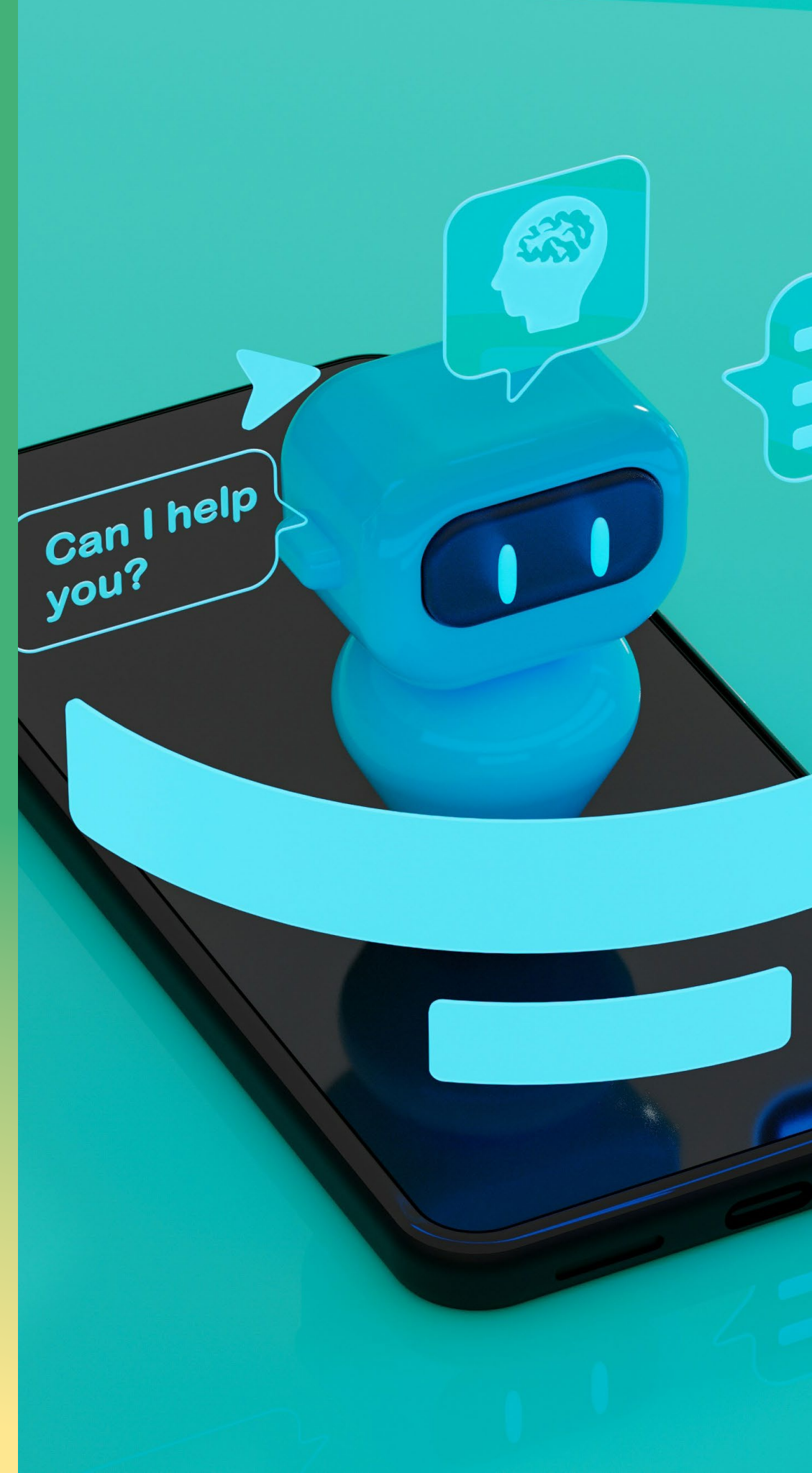
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On 2 August 2025, the provisions of the **European Union (EU) Artificial Intelligence Act** (AI Act or the Act) concerning General-Purpose Artificial Intelligence (GPAI) models, laid out in Chapter V, and the provisions on issues such as the tasks and powers of the EU Artificial Intelligence Office (AI Office), the protection of confidentiality and trade secrets, supervision mechanisms, and applicable penalties, entered into force.

Accordingly, GPAI providers who place their GPAI models on the market after August 2, 2025, are required to comply with the obligations briefly outlined below as of this date. GPAI providers who placed their models on the market before 2 August 2025 are granted a compliance period until 2 August 2027.

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## Chapter V Regulations on GPAI Models

### What is GPAI?

GPAI models are artificial intelligence models that are developed to perform not only a specific task or domain but also multiple distinct and unrelated tasks. Typically trained on large-scale datasets, these models can be integrated into a wide range of subsystems and applications in various sectors, regardless of how they are placed on the market.

Current models such as **GPT-4**, **Claude**, **Gemini** and **LLaMA** are examples of GPAI mechanisms that fall under this category. These types of models can perform a wide range of functions within a single system, including chatbot services, text generation, visual and video analysis, voice assistants, code generation, and data analytics.

### Who is a GPAI Provider?

A GPAI provider is a natural or legal person who develops a GPAI model or places it on the EU market, for a fee or free of charge, under their name or trademark. In addition, secondary actors, who acquire a GPAI model and make substantial modifications or retrain it are also considered providers if such changes significantly affect the model's general capabilities, systemic risk level, or performance.

## What Obligations Came into Effect?

**Record-Keeping, Transparency, and Reporting Obligations:** GPAI providers must prepare technical documentation related to the training, testing, and evaluation processes of their models, keep these documents up to date, and submit them to the AI Office and competent national authorities upon request. In addition, they must provide information and documentation to support AI system providers intending to integrate the model into their systems. Providers are required to prepare and publish a publicly available summary outlining the types, sources, and processing methods of the data used to train the model, in accordance with the template provided by the AI Office.

**Systemic Risk Assessment:** The Act classifies certain GPAI models as “*models with systemic risk*”. Models trained with total computational power exceeding  $10^{25}$  FLOPs or those identified by the European Commission (Commission) as having high impact capacity fall into this category.

Providers of such models are required to carry out model evaluations and documented testing; identify, assess, and mitigate the sources of systemic risks at the EU level; report serious incidents and potential corrective actions without delay to the AI Office and, where necessary, to national authorities; and ensure adequate cybersecurity protection for the model and its physical infrastructure.

**Copyright Compliance Obligation:** GPAI model providers must demonstrate that the data used to train the models was obtained in accordance with EU copyright law, particularly the Directive on Copyright and Related Rights in the Digital Single Market (DSM Directive).

**Security and Misuse Prevention Obligation:** GPAI providers are obliged to take technical and organizational measures to prevent the misuse of their models.

**Obligation to Appoint an EU Authorized Representative:** GPAI model providers established outside the EU must appoint an authorized representative established within the EU prior to placing the model on the EU market.

## What are the Additional Resources?

To clarify the scope of the obligations listed above, facilitate compliance, define transparency standards, and enhance cooperation between providers and the AI Office, the Commission published the “*Code of Practice*” on 10 July 2025. Additionally, on 18 July 2025, a non-binding GPAI Scope Guidance was published, which includes the definition of GPAI, systemic risk criteria, determination of provider status, the scope of the open-source exception, and the Commission’s interpretation regarding implementation and supervision.







## Other Provisions Entered into Force:

**Notification and Supervision Mechanism:** The rules governing the designation, supervision, and authorization of conformity assessment bodies for high-risk AI systems, set out in Annex III of the Act, have entered into force.

**AI Office:** The provisions of Chapter VII concerning the AI Office have entered into force. The AI Office is the central regulatory and supervisory authority, established within the Commission, responsible for the implementation of the AI Act.

**Confidentiality and Protection of Trade Secrets:** Article 78, which contains confidentiality obligations, has entered into force. Under this article, authorities are required to maintain the confidentiality of information obtained during their duties, only request necessary data, store it securely, and delete it when no longer needed.

**Sanctions:** Sanctions for violations of the AI Act have entered into force. Accordingly:

- For breaches of the provisions on prohibited AI practices, which entered into force on 2 February 2025, fines of up to EUR 35 million or up to 7% of the previous year's global turnover may be imposed.
- For violations of other obligations, fines of up to EUR 15 million or up to 3% of global turnover may apply.
- In cases where incorrect, incomplete, or misleading information is provided to authorities, administrative fines of up to EUR 7.5 million or up to 1% of turnover may be imposed.

Under the Act, the higher of the two thresholds shall apply. However, for small and medium-sized enterprises (SMEs) and start-ups, fines are calculated based on the lower threshold.

# Key Contacts



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