

Obligations for GPAI Model providers under the AI Act

applicable from 2 August 2025

What is a GPAI model?

- GPAI stands for General Purpose Artificial Intelligence
- GPAI models:
 - exhibit **significant generality**
 - accommodate a **wide range of distinct tasks**
- Common examples are large language models
- **Indicative criterion:** AI models with a training compute **greater than 10²³ Floating Point Operations (FLOP)** that can generate language, text-to-image or text-to-video. AI models that lack significant generality or the capability to perform a wide range of distinct tasks, are not GPAI models

- **To note: Finetuning of an existing GPAI model can result in a new GPAI model:**
 - Modification or finetuning of the GPAI model resulting in a significant change of the generality, capabilities, or systemic risk of the model
 - **Indicator:** The modification uses over one-third of the original model's training compute

Who is a provider of a GPAI model?

GPAI model providers:

- An entity – seated inside or outside EU – that **develops** a GPAI Model and places it on the EU market
- An entity that has a GPAI model **developed on its behalf by someone else**, but places it on the market itself, also qualifies as a provider
- Developing may include finetuning existing GPAI models
- Placing on the market may include distributing software that leverages the GPAI model

Downstream providers of GPAI models:

- Downstream entities who **modify or fine-tune** the GPAI model, leading to a significant change, also become providers of a new, independent GPAI model

Providers of GPAI models with systemic risk:

- GPAI models with systemic risk are limited to only a few very advanced models
- **Systemic risk** specific to the high-impact capabilities of the GPAI model, presumed for cumulative training compute exceeding 10²⁵ FLOP
- Providers are subject to additional compliance obligations

Requirements for GPAI model providers (including downstream modifiers)

- **Document technical information** about their models and provide it upon request to the AI Office, national competent authorities
- Create and make available information and documentation **to providers integrating the GPAI model into their AI systems**
- Put in place a **policy to comply with EU copyright law**
- Prepare and publish a **training data summary** in line with the AI Office's [Template](#)
- Providers established in third countries shall name an **authorised representative in the EU**
- **Obligations for in-scope downstream providers of GPAI models:**
 - Providing the documentation limited to information on the modification
 - Implementing a copyright policy and providing a training data summary limited to the data used for that modification

If the model is released under a free and open-source license

- No technical documentation needs to be provided
- The obligations related to copyright policy and summary of training data remain in effect
- Exemption does not apply to GPAI models with systemic risk

How to show compliance and how the obligations are enforced

- **GPAI Code of Practice**: provides measures on how to comply with the relevant obligations under the AI Act
- Signing the Code is **not mandatory**, but doing so can **demonstrate compliance** with the obligations for GPAI models providers
- Obligations for providers of GPAI models apply from **2 August 2025**, two years later for models that have already been placed on the market before that date
- **Commission will enforce the obligations for GPAI model providers**, including through fines, as from **2 August 2026**
- The EU Commission has published [Guidelines on the obligations for providers of GPAI models](#)

You can find further information on obligations for GPAI models and AI topics on our [website](#).

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