SAMPLE - fictional company, not legal advice

EU AI Act Article 50 Gap Report: Example Co (fictional)

Tier: Article 50 Readiness Review · Order: SAMPLE-FICTIONAL · Generated 2026-11-02 · Sources verified 2026-10-25

> **Not legal advice.** This report is generated automatically by AI software operated by RuleReddy from the answers you provided. It is general regulatory information, not legal advice, and it does not create an attorney-client relationship. It may contain errors or omissions, and it reflects the official sources listed as of the "sources verified" date. Before relying on it, verify the conclusions with qualified EU counsel. Each statement cites the official source it relies on; statements without a citation are marked as RuleReddy suggestions, not legal requirements.

Summary

(Summary is generated from the findings below.)

Key dates

- **Requirement:** Article 50 applies from 2 August 2026 to providers and deployers. [S:FAQ] [S:ACT]
- **Requirement:** Only exception: providers of generative AI systems placed on the market before 2 August 2026 have until 2 December 2026 for the Art. 50(2) marking duty (Art. 111(4), inserted by Regulation (EU) 2026/1744). [S:OMNI] [S:FAQ]

Product: Example Co Support Chat (fictional)

Description provided: Fictional website support chatbot built on a third-party model API; answers EU customers in English and German.

[GAP] Art. 50(1): inform people they are interacting with an AI system, unless it is obvious

- **Requirement:** Art. 50(1): inform people they are interacting with an AI system, unless it is obvious. [S:ART50] [S:FAQ] [S:GUIDE]
- **Finding:** Current disclosure: none reported. Information must be given clearly and distinguishably, at the latest at the first interaction, and must meet accessibility requirements (Art. 50(5)). The Commission reads the 'obvious' exemption restrictively. This duty applies from 2 August 2026; the Omnibus transitional period does not cover it. [S:ART50] [S:FAQ] [S:GUIDE]
- **Suggested action (RuleReddy suggestion, not a legal requirement):** Show a notice before or at the first message (e.g. the RuleReddy drop-in notice); keep it visible on mobile; screen-reader accessible; localise for EU languages served.

[GAP] Art. 50(2): mark synthetic audio, image, video or text output in a machine-readable, detectable format

- **Requirement:** Art. 50(2): mark synthetic audio, image, video or text output in a machine-readable, detectable format. [S:ART50] [S:FAQ] [S:OMNI] [S:COP]
- **Finding:** Output types: text. Current marking: none reported. Exceptions exist for assistive standard editing that does not substantially alter input. Your system was not on the market before 2 Aug 2026, so the duty applies already (since 2 Aug 2026); the 2 December 2026 transitional period does not apply. [S:ART50] [S:FAQ] [S:OMNI] [S:COP]
- **Suggested action (RuleReddy suggestion, not a legal requirement):** Adopt marking measures described in the Code of Practice (e.g. metadata/watermarking); confirm upstream vendor marking is preserved end-to-end.

Product: Example Co Image Studio (fictional)

Description provided: Fictional AI image tool that generates product and marketing images from text prompts for EU users.

[REVIEW] Art. 50(2): mark synthetic audio, image, video or text output in a machine-readable, detectable format

- **Requirement:** Art. 50(2): mark synthetic audio, image, video or text output in a machine-readable, detectable format. [S:ART50] [S:FAQ] [S:OMNI] [S:COP]
- **Finding:** Output types: image. Current marking: C2PA metadata from the upstream image model (not yet verified end-to-end). Exceptions exist for assistive standard editing that does not substantially alter input. Your system was on the market before 2 Aug 2026, so the transitional period applies: you must comply with Art. 50(2) by 2 December 2026 (Art. 111(4) AI Act, inserted by Regulation (EU) 2026/1744). [S:ART50] [S:FAQ] [S:OMNI] [S:COP]
- **Suggested action (RuleReddy suggestion, not a legal requirement):** Adopt marking measures described in the Code of Practice (e.g. metadata/watermarking); confirm upstream vendor marking is preserved end-to-end.

Prioritised action plan (RuleReddy suggestion, not a legal requirement)

1. [GAP] Example Co Support Chat (fictional): Show a notice before or at the first message (e.g. the RuleReddy drop-in notice); keep it visible on mobile; screen-reader accessible; localise for EU languages served.

2. [GAP] Example Co Support Chat (fictional): Adopt marking measures described in the Code of Practice (e.g. metadata/watermarking); confirm upstream vendor marking is preserved end-to-end.

3. [REVIEW] Example Co Image Studio (fictional): Adopt marking measures described in the Code of Practice (e.g. metadata/watermarking); confirm upstream vendor marking is preserved end-to-end.

- After you update your flows, you can request one free re-run of this report within 30 days of delivery (re-submit the intake with the same order ID).

Sources

- [S:ACT] Regulation (EU) 2024/1689 (AI Act), EUR-Lex: https://eur-lex.europa.eu/eli/reg/2024/1689/oj
- [S:ART50] AI Act Article 50: Transparency obligations (AI Act Service Desk, European Commission): https://ai-act-service-desk.ec.europa.eu/en/ai-act/article-50
- [S:COP] Code of Practice on Transparency of AI-generated Content (European Commission): https://digital-strategy.ec.europa.eu/en/policies/code-practice-ai-generated-content
- [S:FAQ] European Commission FAQ: Transparency obligations under Article 50 of the AI Act (24 July 2026): https://digital-strategy.ec.europa.eu/en/faqs/transparency-obligations-under-article-50-ai-act
- [S:GUIDE] Commission Guidelines on Article 50 transparency obligations, C(2026) 5054 final, 20.7.2026: https://ai.cy/files/legal-documents/en_Guidelines_on_the_implementation_of_the_transparency_obligations_for_certain_AI_systems_under_Article_50_of_the_AI_Act_BZptWqHk0IKg1dTlDDAp41PSFY
- [S:OMNI] Regulation (EU) 2026/1744 (Digital Omnibus on AI), OJ L 24.7.2026, inserting Art. 111(4) AI Act, EUR-Lex: https://eur-lex.europa.eu/eli/reg/2026/1744/oj/eng

SAMPLE - fictional company, not legal advice

Not legal advice. This report is generated automatically by AI software operated by RuleReddy from the answers you provided. It is general regulatory information, not legal advice, and it does not create an attorney-client relationship. It may contain errors or omissions, and it reflects the official sources listed as of the "sources verified" date. Before relying on it, verify the conclusions with qualified EU counsel. Each statement cites the official source it relies on; statements without a citation are marked as RuleReddy suggestions, not legal requirements.

SAMPLE - fictional company, not legal advice