General-purpose AI

What is 'general-purpose AI'?

A 'general-purpose AI (GPAI) model' is an AI model that can be used for a wide range of tasks and integrated into a variety of downstream systems or applications.

Well-known examples are the Large Language Models used by generative AI applications such as Open AI's ChatGPT 4o and Google's Gemini. These are also sometimes referred to as 'foundation models'.

This definition doesn't cover AI models used for research, development or prototyping before release onto the EU market.

General-purpose AI 'systems' integrate GPAI models with additional components like hardware, software and a user interface.

Who do the GPAI rules apply to?

Most of the AI Act rules apply to **Providers** of GPAI models.

For example, OpenAI in the case of ChatGPT and Microsoft in the case of Copilot.

It's important to note that organsiations **using** GPAI models (i.e. Deployers) don't have any specific obligations in relation to those models. In fact, Deployers are likely to benefit from the transparency obligations that Providers must satisfy, giving them better insight into the GPAI model's training data, capabilities and limitations.

To find out more about whether you're likely to be a Deployer or Provider, see **EU AI Fact Sheet 2: Scope**.

What obligations do GPAI Providers have?

The AI Act takes a risk-based approach to GPAI, meaning the requirements reflect the level of potential risk.

GPAI models are not classified as high risk because they have a wide range of potential uses, most of which are low risk. However, Providers of GPAI models do have some specific obligations, most of which focus on ensuring transparency.

1 All GPAI models

— **Providers must maintain detailed technical documentation** and share it with downstream Providers intending to integrate the model into their own AI systems. This is to ensure Deployers understand the capabilities and limitations of the GPAI model, helping to ensure AI safety and fairness.

— **Providers must establish a copyright policy** to comply with EU copyright laws when training their models.

— **Providers must publish all data** used to train the GPAI model.

2 GPAI models with systemic risk

The EU Commission can classify an GPAI model as having "systemic risk" where it has "high impact capabilities". This isn't defined but if a GPAI model uses a large amount of 'compute' it is considered to have a systemic risk.

The AI Office (a new EU regulatory agency) can classify other models as having systemic risk based on criteria like the number of users or the degree of autonomy of the model.

In addition to the GPAI model obligations above, Providers of GPAI models with systemic risk must also:

— **Perform model evaluations** that include conducting and documenting adversarial testing to identify and mitigate systemic risk.

— **Assess and mitigate systemic risks**, including their sources.

— **Maintain adequate cybersecurity protection**.

— **Report serious incidents** to the AI Office and relevant national authorities without undue delay.

In anticipation of possible artificial general intelligence or 'AGI', the AI Act also envisages the potential for GPAI models that present "systemic risk at Union level". This means GPAI models that could have a significant impact on the EU due to their reach and negative effects on public health, safety, security, fundamental rights or society.

What about open-source AI?

Open-source AI is a contentious topic, with no settled meaning as yet.

The AI Act wades into the debate by providing that a "licence should be considered free and open source [...] when it allows users to run, copy, distribute, study, change and improve software and data".

Free, open-source GPAI models without systemic risks are not subject to the same transparency obligations as other GPAI models, because the way they function is already inherently more transparent. However, they are required to comply with the copyright and training data requirements set out above.