

EU AI Act vs Interim Measures for Generative AI Service Management

Editorial verdict: **converges** — see comparison narrative below.

EU · BINDING REGULATION

EU AI Act

EU-AIA-2024

TREATMENT OF FOUNDATION MODELS / GPAI

governs

Arts. 51-55 (general-purpose AI + systemic risk)

Primary source: [Regulation \(EU\) 2024/1689](#)

CN · BINDING REGULATION

Interim Measures for Generative AI Service Management

CN-GENAI-2023

TREATMENT OF FOUNDATION MODELS / GPAI

governs

Art. 2 (applies to GenAI services regardless of size)

Primary source: [CAC Order No. 15](#)

What this comparison shows

The two regimes take the same position. This is a candidate for cross-jurisdictional alignment in industry guidance, voluntary codes, and harmonisation tracks.

Contested question: Does the foundation-model category map to a coherent capability tier, or is it a regulatory convenience? Compute-threshold vs behavioural-threshold debate is unresolved across EU/US/China.

Bibliography

1. [Regulation \(EU\) 2024/1689](#) — EU AI Act.
2. [CAC Order No. 15](#) — Interim Measures for Generative AI Service Management.
3. [Policy Window — Foundation Models / GPAI](#) (cross-jurisdiction topic article with full coverage matrix).