SELECTED DOCUMENTS · FOUNDATION MODELS / GPAI

EU AI Act vs Interim Measures for Generative AI Service Management

Both selected documents have the same broad classification. This does not establish that their legal positions are the same.

EU · BINDING REGULATION

EU AI Act

EU-AIA-2024

Status recorded: in force. Effective date recorded: 2024-08-01.

Last recorded review: 2026-07-17.

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

Status recorded: in force. Effective date recorded: 2023-08-15.

Last recorded review: 2026-05-24.

TREATMENT OF FOUNDATION MODELS / GPAI

governs

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

Primary source: CAC Order No. 15

How to read this comparison

These assessments concern the selected documents, not every law applicable in their jurisdictions. Compare the cited provisions, scope, legal status and dates. Matching categories do not establish matching duties; missing entries do not establish legal gaps.

Question for further analysis: 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).

Generated 2026-11-19T01:16:15 UTC. This is not a legal-review date. Presentation corrected 16 November 2026; source records unchanged. See https://policywindow.org/wiki/meta#coverage-correction and https://policywindow.org/wiki/methodology.