

EU AI Act vs Interim Measures for Generative AI Service Management

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

EU · BINDING REGULATION

EU AI Act

EU-AIA-2024

TREATMENT OF TRANSPARENCY OBLIGATIONS

governs

Arts. 13, 50 (transparency obligations)

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

CN · BINDING REGULATION

Interim Measures for Generative AI Service Management

CN-GENAI-2023

TREATMENT OF TRANSPARENCY OBLIGATIONS

conflicts

Art. 4 + Algorithm Recommendation Rules — disclosure to CAC, not public; conflicts with EU public-disclosure model

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

What this comparison shows

The two regimes take measurably different positions on this topic. This is a likely site of jurisdictional friction for cross-border deployers and a candidate for inclusion in harmonisation-track discussions.

Contested question: Does transparency disclosure (model cards, training-data summaries) actually reduce bias / misuse / accidents? Selbst & Barocas (2019) argue disclosure ` fairness; regulators assume it helps.

Bibliography

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