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Step 1: Classify whether your software is regulated as an AI System, a General-Purpose AI System, or an AI model

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1. An "AI System" under the AI Act means:

"… A machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments."

"AI System" clearly has a broad definition and is structured to differentiate it from less sophisticated software which has been in existence and used for many years and which has not demonstrated a need for specific regulation. It is important to be able to distinguish between standard programming approaches and AI.

AI Models are essential components of AI Systems (the categorisation which attracts regulation under the AI Act) and while they are the key component of AI Systems, further components such as an interface, etc., are necessary to become classified as an AI System.

2. "General-purpose" AI Models are defined as being:

"… Trained with a large amount of data using self-supervision at scale, that displays significant generality and is capable of competently performing a wide range of distinct tasks regardless of the way the model is placed on the market and that can be integrated into a variety of downstream systems or applications, except AI models that are used for research, development or prototyping activities before they are placed on the market."

General Purpose AI Models are differentiated on the basis of the breadth of tasks which those systems can undertake. Recital 100 sets out that such systems have the "capability to serve a variety of purposes" and that they can be used directly or integrated into other AI Systems. Recital 99 clarifies that "Large generative AI models are a typical example for a general-purpose AI model".

General Purpose AI Models are treated and regulated in a different way to AI Systems due to their versatility, their manifestation as consumer useable general online platforms and potential to have systemic risks as a result.

Next steps

EU AI Act: Guide for your business →

Step 1: Classify whether your software is regulated →

Step 2: Assess for exemption? →

Step 3: Assess for prohibition →

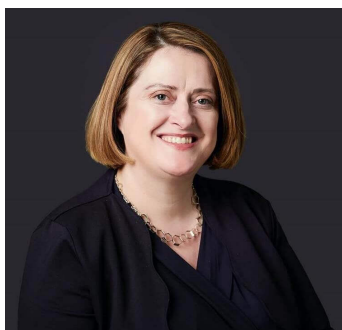**Step 4: Identify whether you are engaging with high-risk AI** →

Step 5: Classify what roles you are likely to fall into →

Step 6: Ensure established AI classification doesn't change →

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