

Article 50

72-Hour Go-Live Packet

A printable release-room path for teams preparing visible notices, provider-side marking work, tests, owners, and evidence before the EU AI Act Article 50 transparency obligations apply.

OBLIGATIONS APPLY	SOURCE POSITION
02 AUG 2026	FINAL GUIDELINES
Relevant Article 50 cases	20 July guidelines 24 July FAQ

Use it as a release control, not a legal conclusion.

Start with the live official tools and your facts. One system or workflow may create more than one Article 50 workstream. Record uncertainty and hold the affected release surface when an owner, control, test, or evidence reference is missing.

01	02	03	04
Direct AI interaction Provider notice	Synthetic content Provider marking	Emotion / biometric Deployer notice	Deepfake / public-interest Deployer disclosure

Boundary

This packet does not determine scope, certify compliance, implement machine-readable marking, replace accessibility or data-protection review, or provide legal advice. A checked box is not proof; retain the underlying evidence.

Four cases. Two primary roles. Different controls.

Use the trigger and the organisation's role for the specific system or workflow. Do not assume a visible chatbot notice satisfies provider-side marking duties.

CASE	TRIGGER / PRIMARY ACTOR	CUTOVER CONTROL	MINIMUM EVIDENCE
01	Direct interaction Provider	Notify no later than first interaction unless the official obviousness condition applies.	First-interaction capture; approved copy; exception rationale if used.
02	Synthetic content Provider	Route machine-readable marking and detectability work; test exclusions and technical limits.	Marking design; output sample; detection result; limitation record.
03	Emotion recognition or biometric categorisation Deployer	Inform exposed natural persons and route applicable data-protection work.	Notice placement; audience coverage; privacy review reference.
04	Deepfake or certain public-interest text Deployer	Disclose artificial generation or manipulation; document human-review and editorial-control analysis.	Label specimen; first-exposure capture; publishing control; accountable party.

Three date controls

02 AUG 2026 Article 50 obligations apply.	27 JUL 2026 Initial Transparency Code signatory-list cut-off; later signing remains possible.	02 DEC 2026 Limited transition described for qualifying pre-existing Article 50(2) marking systems, not every duty.
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Move from scope freeze to tested release evidence.

T-72	Freeze scope and owners List the systems, features, content workflows, audiences, surfaces, countries, and accountable owners in the release. ☐ Role and case recorded ☐ Unresolved uses isolated ☐ Official source review date captured
T-48	Implement the actual control Put the notice, marking route, disclosure, or publishing control into the live release path - not only the policy document. ☐ Copy or technical requirement approved ☐ Localisation and accessibility owner assigned ☐ Fallback or hold path defined
T-24	Test the trigger and persistence Capture the first interaction or first exposure, output marking, label visibility, screen-reader path, mobile layout, and downstream persistence. ☐ Expected state captured ☐ Known limitation recorded ☐ Evidence link opens for reviewer
T-0	Release or hold A named reviewer records GO, CONDITIONAL, or HOLD for each affected surface. Open evidence gaps default to HOLD. ☐ Decision and timestamp recorded ☐ Incident owner and monitoring path ready ☐ Next review trigger scheduled

Do not use a generic readiness percentage.

A high score can hide one release-blocking gap. Use one row per surface and keep the decision binary: GO only when the responsible case has an owner, implemented control, test result, and accessible evidence reference.

One evidence-linked decision per release surface.

CONTROL	PASS CONDITION	STATUS	OWNER / EVIDENCE
Scope	Actor role, Article 50 case, audience, and surface are recorded.	☐ PASS ☐ GAP ☐ N/A	
Live control	Required visible or technical control is present in the release path.	☐ PASS ☐ GAP ☐ N/A	
Copy / marking	Copy, placement, marking method, exceptions, and limitations have an approval record.	☐ PASS ☐ GAP ☐ N/A	
Test	Trigger, timing, accessibility, localisation, persistence, and failure path were tested.	☐ PASS ☐ GAP ☐ N/A	
Evidence	The reviewer can open the current evidence reference without customer personal data.	☐ PASS ☐ GAP ☐ N/A	
Operations	Monitoring, incident escalation, change review, and next review date are assigned.	☐ PASS ☐ GAP ☐ N/A	

GO All applicable controls PASS and evidence opens.	CONDITIONAL Only non-blocking follow-up remains, with owner and due date.	HOLD Any applicable control has a GAP, missing owner, or missing evidence.
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Release surface: _____

Decision: ☐ GO ☐ CONDITIONAL ☐ HOLD

Reviewer: _____ Timestamp: _____

Open item and owner: _____

Retain what a reviewer can actually inspect.

EVIDENCE OBJECT	WHAT TO RETAIN	REFERENCE
Scope decision	System, actor role, trigger, audience, surface, rationale, official source version.	_____
Implementation	Approved copy, technical design, placement, marking method, language versions.	_____
Test	Timestamped capture, output sample, accessibility result, limitation, reviewer.	_____
Release	GO / CONDITIONAL / HOLD decision, owner, timestamp, open item, next review.	_____
Change / incident	Trigger, affected surface, corrective action, evidence update, closure.	_____

Controlling public sources

Final Article 50 Guidelines - published 20 July 2026 digital-strategy.ec.europa.eu/en/library/guidelines-transparency-obligations-providers-and-deployers-ai-systems Article 50 FAQ - updated 24 July 2026 digital-strategy.ec.europa.eu/en/faqs/transparency-obligations-under-article-50-ai-act Quick Facts: Transparency rules for AI systems digital-strategy.ec.europa.eu/en/factpages/quick-facts-transparency-rules-ai-systems
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FREE OPERATING REGISTER	\$39 OPERATIONS KIT	\$69 SPRINT BUNDLE
Assign cases, owners, tests, and evidence in a local browser queue.	Eight-sheet Excel workbook plus editable playbook.	Operations kit, React disclosure UI, official EU icons, and offline room.
profitflow-kr.cosmocho.chatgpt.site/ai-transparency-implementation-register	profitflow-kr.cosmocho.chatgpt.site/ai-transparency-kit	profitflow-kr.cosmocho.chatgpt.site/ai-transparency-bundle

Final boundary: Re-check the live official sources before acting. This independent packet is not an official EU instrument, legal advice, certification, conformity assessment, or proof of compliance.