

# General-Purpose AI Code of Practice: Provide your feedback to the second draft

Fields marked with \* are mandatory.

## [Provide your feedback to the first general-purpose AI Code of Practice!](#)

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Thank you for your continuous support and participation in the drawing-up of the **first general-purpose AI Code of Practice**.

Upon receiving the **second draft**, you are encouraged to express your comments on the **overall content** of this draft, deadline **Wednesday 15 January 2025, 12:00 CET**.

As for the first round, your feedback is essential in tailoring the Code of Practice to meet diverse stakeholder needs to achieve a final Code of Practice that best reflects the different submissions. This will lead to a proper application of the rules of the AI Act for general-purpose AI models.

Participants will be asked to answer two types of questions:

1. **Opinion rating** (close-ended feedback): express the level of satisfaction with the overall content.
2. **Open-ended questions**: to provide suggestions on how to improve Code of Practice. Please note that any feedback to specific content should be given per Section in the dedicated surveys.

For the ease of engaging with the survey, please have the Code of Practice open for reference.

For organisations, the nominated Point of Contact will receive this survey on the overall Code of Practice draft and is responsible for collecting feedback from their organisation's working group representatives.

You have the option to respond to all questions if you wish, however, you do not have to. Each stakeholder can only **submit one answer** to this survey. **If you forward the link, it will be possible for others to edit or download your response.**

Your responses will be kept confidential in accordance with the Vademecum.

The AI Office is looking forward to this inclusive and transparent process!

## [Stakeholder information](#)

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Please provide your name, surname, email address, and the name of your organisation (if applicable). Please note that if your contact information does not correspond to an eligible participant or to the organisation's Point of Contact, your response will be discarded.

	Name	Surname	Email address	Organisation (if applicable)
Stakeholder	Maria	Goikoetxea	mgoikoetxea@actonline.org	ACT   The Association

\* Which stakeholder category would you (or your organisation) consider yourself in?

- Academia (in a personal capacity)
- Civil society organisation
- Downstream provider of an AI system based on general-purpose AI models, or acting on behalf of such providers
- EU Member State representative
- European or international observer
- Other independent expert (in a personal capacity)
- Other industry organisation, or acting on behalf of such organisations
- Other organisation with relevant expertise
- Other stakeholder organisation
- Provider of a general-purpose AI model, or acting on behalf of such providers
- Rightsholder organisation

## Overall Code of Practice Draft

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To what extent are you satisfied with the overall content of the Code of Practice?

- 1: Dissatisfied
- 2: Slightly dissatisfied
- 3: Moderately satisfied
- 4: Mostly satisfied
- 5: Highly satisfied

Would you like to share any comments on the overall Code of Practice Draft?

*3000 character(s) maximum*

While we commend the refinements in the second draft, particularly the inclusion of preliminary KPIs and systemic risk measures, several areas still require further clarification and support for SMEs to ensure fair and effective compliance:

- o Transparency obligations should balance legal requirements with practical SME capabilities, protecting trade secrets and sensitive information.
- o The systemic risk measures need to focus on foreseeable, contextually relevant risks, avoiding hypothetical scenarios that impose unnecessary burdens.
- o Simplification through standard templates for documentation and risk assessments is essential to minimise resource strain on smaller providers.

SMEs would benefit from tiered obligations based on the scale and scope of their AI operations, aligned with the risk-based approach highlighted in the AI Act. The emphasis on transparency, such as the inclusion of templates for summarising training data, is a positive step. However, for SMEs, such obligations must be simplified. SMEs often do not have the resources to create extensive documentation akin to larger players. Standardised, pre-designed templates tailored for SMEs could ease compliance burdens.

Clearer commitments to SME-specific measures are necessary. We are concerned that practical support to implement compliance measures remains a critical gap in the second draft. Introducing initiatives such as resource-sharing hubs, simplified guidance for SMEs, and direct support from the AI Office would enhance implementation feasibility.

What effect will the Code of Practice (as per current draft) have on the work of AI Safety researchers & engineers working directly for a Signatory?

*3000 character(s) maximum*

The measures provide a clear framework for addressing safety concerns but could overwhelm resources, especially for smaller teams. Introducing proportional obligations based on the size and scope of the Signatory could mitigate this impact.

What effect will the Code of Practice (as per current draft) have on the work of AI Safety researchers & engineers working independently, in academia or for third parties who are not Signatories?

*3000 character(s) maximum*

Many independent researchers and academics operate within limited budgets and rely on external funding. The introduction of additional compliance requirements, such as systemic risk assessments or incident reporting, could discourage participation in safety efforts due to resource limitations. The Code should acknowledge these constraints and propose support mechanisms, such as grants or shared tools, to encourage participation by smaller or independent actors.

While we acknowledge the importance of AI safety and supports the overarching goals of the Code of Practice, we believe the current draft of the Code of Practice remains problematic for SMEs and independent researchers. To ensure that independent researchers and non-signatory engineers can continue contributing to AI safety, the Code must prioritise accessibility, collaboration, and proportionality. A balanced approach is essential to foster innovation, uphold safety standards, and encourage broad participation across all segments of the AI ecosystem.

## Contact

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