

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

Fields marked with * are mandatory.

Provide your feedback to the third draft of the general-purpose AI Code of Practice!

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

Upon receiving the **third draft**, you are encouraged to express your comments on the overall content of the draft, deadline **Sunday 30 March 2025 EOD**.

As for the previous rounds, 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. Please be aware that the survey does not cover Art. 53(1)(d) issues.

The survey presents two standard questions:

- **Opinion rating** (close-ended feedback): express the level of satisfaction with the overall content.
- **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!

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 App 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

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

Do you believe the third draft represents an improvement over the second draft?

5000 character(s) maximum

While the third draft includes welcome improvements in structure and clarification of some commitments, it remains overly complex and may place an excessive burden on smaller providers, particularly small and medium-sized enterprises (SMEs). One area of concern is the proposed approach to compliance flexibility. Advising providers to simply 'email the AI Office' if they are unable to meet certain obligations is neither realistic nor scalable. This ad hoc mechanism lacks the predictability and structure necessary for effective implementation, especially for organisations without dedicated legal or compliance resources. Additionally, the current exemptions framework, particularly for SMEs and open-source models, remains insufficiently defined and risks unintended consequences. Its ambiguity could lead to inconsistent application, legal uncertainty, and even deter participation in the ecosystem by smaller or newer players. We strongly recommend a more robust and practical approach to flexibility and exemptions, with clearly defined, scalable, and easy-to-understand pathways for compliance. There is an urgent need for meaningful simplification across the Code to ensure that it is not only principled but also implementable in practice.

Please provide below your thoughts on the preamble of the Code of Practice.

5000 character(s) maximum

The preamble rightly acknowledges the importance of proportionality and the need for simplified compliance pathways for small and medium-sized enterprises (SMEs) and startups. However, the language used is broad and aspirational, lacking the specificity and operational clarity that SMEs require to confidently engage with the Code.

While Drafting Principle 5 refers to allowing simplified compliance 'where appropriate', there is no clear framework in the preamble that defines what this means in practice; the references to SMEs are scattered and primarily conceptual, there is no indication of structured support, streamlined documentation expectations, or predefined exemptions that SMEs can rely on. Instead, fallback mechanisms such as advising providers to 'contact the AI Office' appear later in the text. These are neither scalable nor predictable and do not amount to a viable compliance pathway.

Please provide below your thoughts on the glossary of the Code of Practice.

5000 character(s) maximum

The glossary is a valuable component of the Code and contributes to greater consistency and legal clarity across its various sections. We welcome the effort to align terms with the AI Act while also introducing definitions for new concepts specific to the Code, such as 'safely derived models', 'systemic risk tiers', and 'state-of-the-art' evaluations.

However, several key definitions still lack sufficient operational clarity. Terms like 'general-purpose AI model with systemic risk', 'safe originator model', and 'model propensities' are central to the Code's structure, yet remain abstract and open to interpretation. This can create uncertainty for providers, particularly small and medium-sized enterprises (SMEs), seeking to understand whether and how certain obligations apply to them.

Please provide below your thoughts on the review and monitoring process of the Code of Practice (Appendix 2).

5000 character(s) maximum

We appreciate the inclusion of a review and monitoring process that allows the Code of Practice to evolve in response to technological, societal, and regulatory developments. The AI Office's role in coordinating these updates is important to ensure continued relevance and alignment with the AI Act.

However, we are concerned that the current framing, particularly the emphasis on continuous updates and rapid iteration, could introduce significant uncertainty for small and medium-sized enterprises (SMEs). Frequent changes to the Code, especially without clear transition periods or scalable communication tools, may create a moving target for compliance. This risks overwhelming SMEs, who often lack the legal or technical capacity to track and adapt to regulatory shifts in real time.

Rather than fostering innovation, such unpredictability may discourage smaller players from entering or scaling in the AI space. We urge the AI Office and Code drafters to strike a balance between adaptability and stability.

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