Yardwork

EU AI Act deployer checklist

Before launch

An implementation aid, not legal advice. Establish the role and application date for your actual use.

- [ ] **Define the authority.**
  Record the legal entity, provider relationship, account owner, environment, and contractor responsibilities.
- [ ] **Define the workflow.**
  Document the trigger, systems, inputs, steps, outputs, and intended business result.
- [ ] **Define the action ceiling.**
  Separate reading, drafting, routing, writing, sending, deleting, and approving. Give the agent only the access needed for the approved scope.
- [ ] **Define the human point.**
  Name who reviews, what they see, what authority they have, and which actions always wait for approval.
- [ ] **Define the evidence.**
  Record the source documentation, configuration, test cases, approvals, changes, exceptions, and incidents.
- [ ] **Define the stop rule.**
  State when the workflow pauses, who is notified, and how the team investigates before resuming.

Notices by channel

Channel or output	Article 50 distinction	Practical placement
Website chat, messaging conversation or voice assistant	Provider direct-interaction duty, unless AI interaction is obvious; Article 50(1).	Identify the assistant as AI when the exchange begins, in the same channel
Background sorting or a draft reviewed and sent by a person	No direct human interaction by the AI under this limb.	Keep the review point clear; assess published content separately
Synthetic audio, images, video or text	Provider machine-readable marking duty, except assistive standard editing or no substantial alteration of the input or its meaning; Article 50(2).	Check that the chosen system supplies the required marking; a visible label has a different job
Deepfake image, audio or video	Deployer disclosure duty; creative works have a tailored disclosure rule.	Disclose in a way the audience encounters with the content
AI text published to inform the public on public-interest matters	Deployer disclosure, with an exception for human review/editorial control and assigned editorial responsibility.	Name the responsible publisher and record the review, or provide the disclosure
Emotion recognition or biometric categorisation	Deployer notice to people exposed; assess other restrictions separately.	Explain operation before exposure; do not treat notice as permission to use a prohibited system

Article 50 transparency: since 2 August 2026. High-risk Annex III: 2 December 2027; Annex I: 2 August 2028. Later high-risk dates do not postpone transparency duties.

Sources

European Commission, AI Act regulatory framework: https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai

European Commission, Article 50 FAQ: https://digital-strategy.ec.europa.eu/en/faqs/transparency-obligations-under-article-50-ai-act

AI Act Service Desk, Article 50: https://ai-act-service-desk.ec.europa.eu/en/ai-act/article-50