

EU AI Act vs Interim Measures for Generative AI Service Management

Editorial verdict: **asymmetric** — see comparison narrative below.

EU · BINDING REGULATION

EU AI Act

EU-AIA-2024

TREATMENT OF ENVIRONMENTAL IMPACT OF AI TRAINING

implicit

Art. 95 voluntary codes of conduct include environmental sustainability; Recital 142 references energy efficiency reporting for GPAI

Primary source: [Regulation \(EU\) 2024/1689](#)

CN · BINDING REGULATION

Interim Measures for Generative AI Service Management

CN-GENAI-2023

TREATMENT OF ENVIRONMENTAL IMPACT OF AI TRAINING

silent

GenAI Measures do not address environmental impact

Primary source: [CAC Order No. 15](#)

What this comparison shows

One regime addresses the topic explicitly while the other covers it only implicitly or not at all. This is a likely site of regulatory arbitrage and a candidate for comparative-law follow-up.

Contested question: Should environmental obligations attach to (a) model-provider disclosure, (b) datacenter operator emissions caps, or (c) end-customer reporting? The training-vs-inference split also remains unresolved across instruments.

Bibliography

1. [Regulation \(EU\) 2024/1689](#) — EU AI Act.
2. [CAC Order No. 15](#) — Interim Measures for Generative AI Service Management.
3. [Policy Window — Environmental Impact of AI Training](#) (cross-jurisdiction topic article with full coverage matrix).