

EU AI Act vs UK Pro-Innovation Approach to AI Regulation (White Paper)

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

EU · BINDING REGULATION

EU AI Act

EU-AIA-2024

TREATMENT OF SYNTHETIC CONTENT PROVENANCE

governs

Art. 50(2) — provider machine-readable marking obligation; Art. 50(4) — deployer disclosure for deep fakes (distinct from the `deepfakes` topic which focuses on mis-use-harms)

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

UK · POLICY STATEMENT

UK Pro-Innovation Approach to AI Regulation (White Paper)

UK-WHITEPAPER-2023

TREATMENT OF SYNTHETIC CONTENT PROVENANCE

silent

Principle-based; provenance not a cross-cutting principle

Primary source: [CP 815 \(2023\)](#)

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 provenance be a model-provider obligation (watermark at generation), a platform obligation (label at distribution), or a recipient right (declare on request)? Each jurisdiction is currently selecting a different burden allocation.

Bibliography

- [Regulation \(EU\) 2024/1689](#) — EU AI Act.
- [CP 815 \(2023\)](#) — UK Pro-Innovation Approach to AI Regulation (White Paper).
- [Policy Window — Synthetic Content Provenance](#) (cross-jurisdiction topic article with full coverage matrix).