European AI Office Working Group meetings:

Code of Practice for General-Purpose AI

Template for summary of training data

AI Office

Working Group 1 - Copyright-related rules

17 January 2025

Overview of the session

1. Template for summary of training content
2. Multistakeholder Consultation
3. AI Office's approach to the template
4. Feedback from stakeholders

1. Template for summary of training content

Provisions in the AI Act

Article 53(1)d)

Providers of general-purpose AI models must draw up and make **publicly** available a **sufficiently detailed summary** about the content used for training of the GPAI model, according to a **template** provided by the AI Office.

Recital 107

- The summary must be **comprehensive in its scope** rather than technically detailed
- **To facilitate parties with legitimate interests** (including rightholders) **to enforce their rights**, while taking due account of **providers' trade secrets**
- AI Office's **template** should be **simple, effective** and allow the summary in a **narrative form**

1. Template for summary of training content
Process and timeline

Template for summary of training data

- To be **adopted by the Commission** together with explanatory guidelines on general-purpose AI rules
- **Complementary to the Code of Practice** (the process is linked)
- The template to **set the structure and minimum content** required for all GPAI models (signatories to the Code or not)
- The Code of Practice can include further voluntary commitments to ensure '**adequacy of detail**' of the summary (Art. 56(1)b))
- Closely **interlinked with the policy on copyright** (Art. 53(1)c)AI Act)

Consultation:

Broad stakeholder consultation on GPAI ~ 430 responses (30 July-18 Sept. 2024)

- Informed first draft by Chairs of the Code of Practice
- Informed the AI Office's drafting of the template for the summary of training data

Next steps:

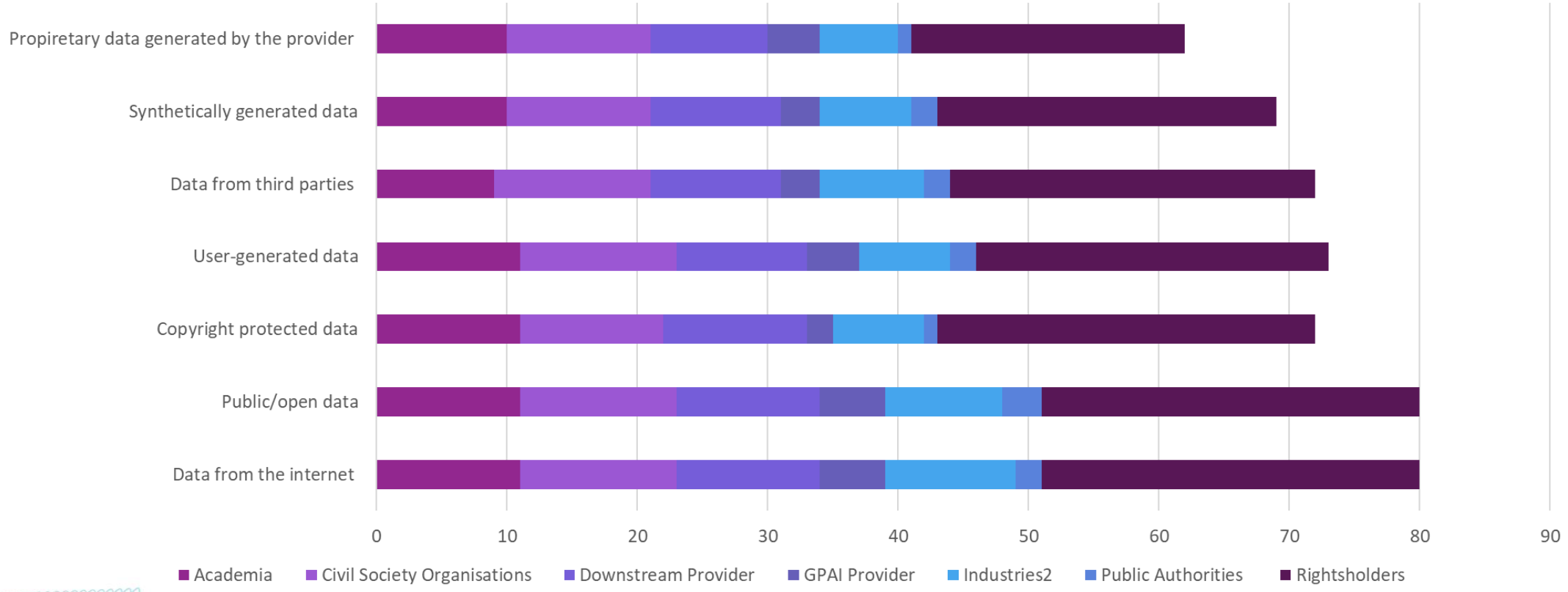
- ❑ **17 January:** Presentation of AI Office's draft to Code of Practice WG 1 Transparency and copyright,
- ❑ **By 31 January:** Written feedback by stakeholders from WG1
- ❑ **End of February:** Presentation of the template and draft GPAI guidelines to Code of Practice WGs
- ❑ **Q2 2025:** Adoption of template and GPAI guidelines
- ❑ **2 August:** Entry into application of general-purpose AI rules

2. Multistakeholder Consultation

Categories of information sources

1

Categories of information sources that should be presented in the summary?



2. Multistakeholder Consultation
Categories of information sources

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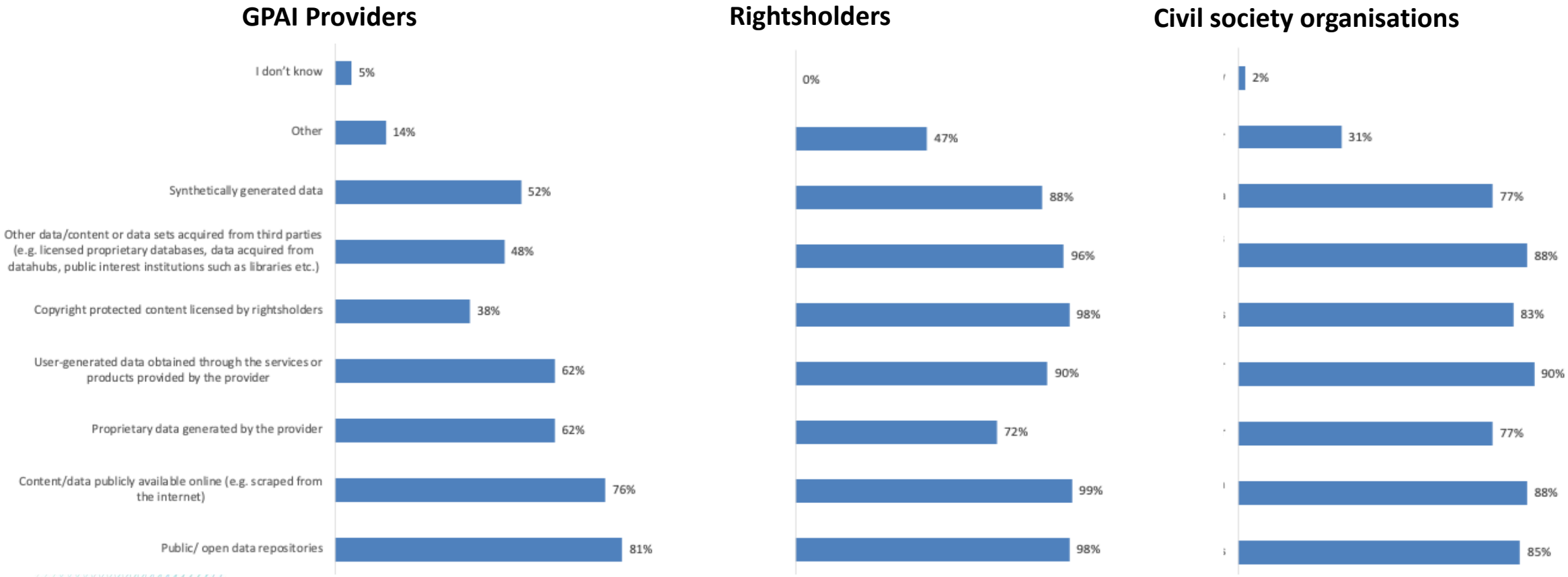
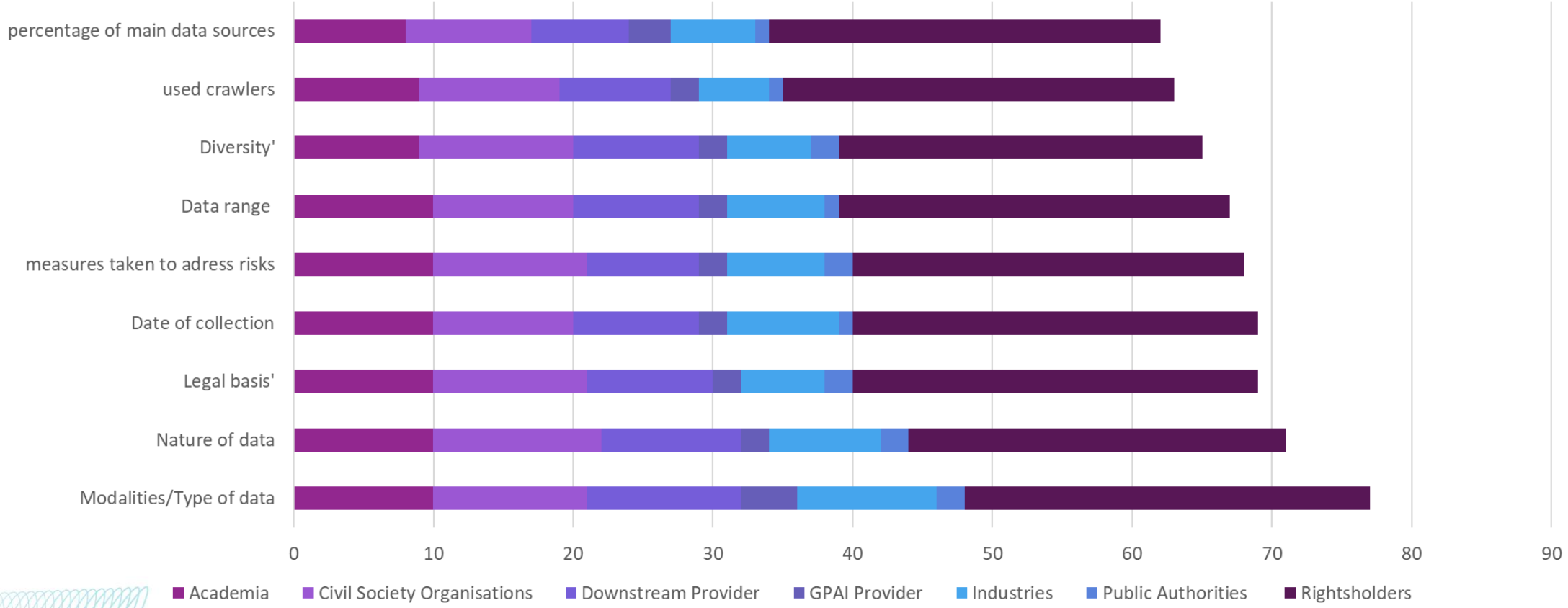


2. Multistakeholder Consultation

Information about the data sources

2 **Should the summary include one or more of the following characteristics/information about the data used for the training?**



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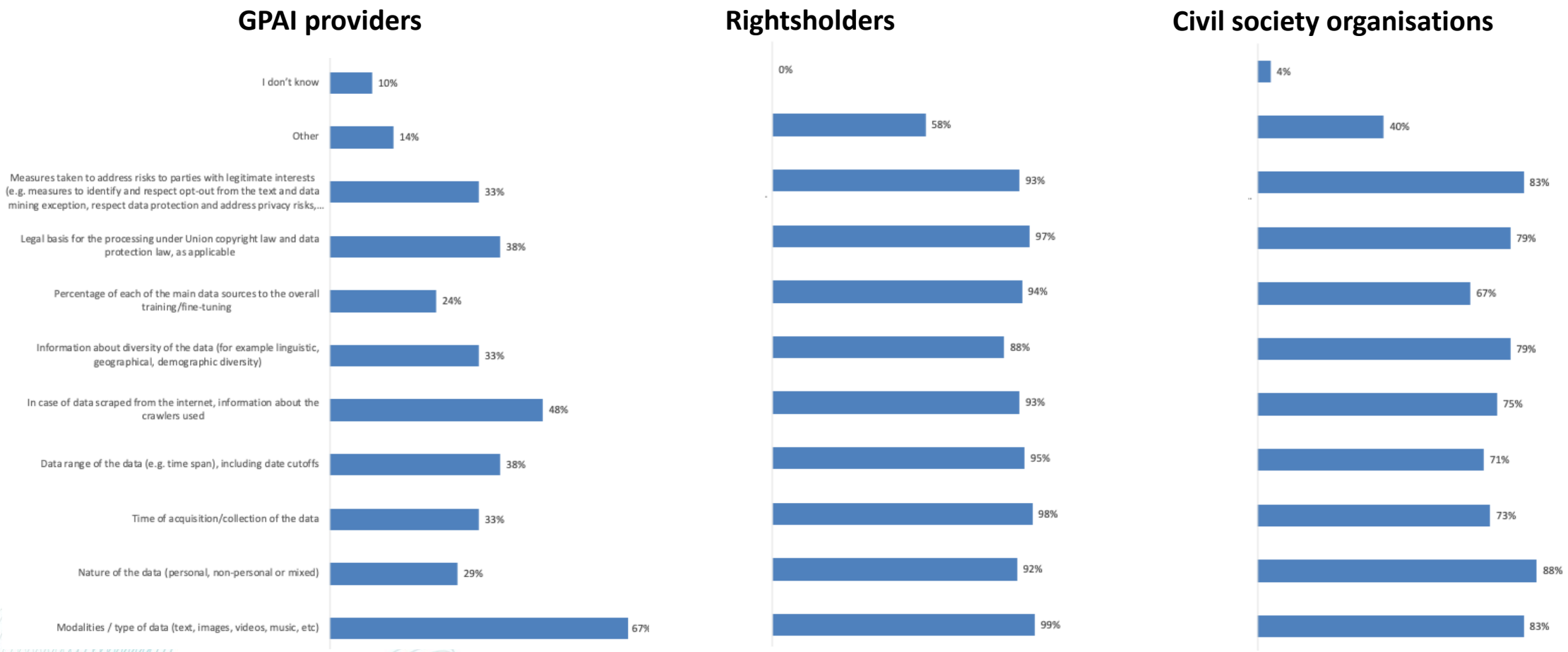

2. Multistakeholder Consultation
Main Results: Balance needed

3 **Open Question: Further recommendations and balance with trade secrets?**

Trade Secrets ← → **Transparency**

Industry/Providers

- Too detailed disclosure can lead to security **vulnerabilities** or **prejudice to AI providers**' competitive advantage
- Trade secrets and confidential information should be **interpreted broadly**
- **Against** disclosure of:
  - Algorithms and model architecture
  - Concrete works/URLs
  - Specific data treatment processes
  - Precise composition/percentage
  - Legal advice

Rightsholders/NGOs

- **Work-by-work disclosure of all sources of data** to train and test the GPAI
- Trade secrets should **not be used to prevent the disclosure** of the information which is essential
- For synthetic data, the summary should also include information on the **model** and ''**data-cleaning standards**''
- **Regulatory oversight** to ensure compliance
- High public transparency of all data sources and lawfulness
- Mitigating measures to address risks to fundamental rights

3. AI Office's approach to the template

Key principles and structure

- **Objective**: to facilitate parties with legitimate interests to exercise their rights under Union law (e.g. rightholders, data subjects)
- **Completeness**: cover all sources of content from pre-training to fine-tuning
- **Effective**: with sufficient details to achieve its objective
- **Simple**: Non-technically detailed, understandable, no legal expertise needed
- **Balance with trade secrets:** due account taken of the need to protect trade secrets, disclose the ingredients but not the secret recipe
- **Proportionate**:
  - Summary narrative form
  - For fine-tuned models: only the additional data used
  - SMEs proportionate burden
  - Up to date: for small updates of the model not more often than 6 months

Proposed sections:

1. General Information

2. List of Data Sources

3. Relevant Data Processing Aspects

3. AI Office's approach to the template

Section 1 General information

1.1 Model and provider identification

- Provider's name and contact
- Authorized representative
- Model identifier
- Base model(s)

1.2. Date of placement on the market and knowledge cut off date

1.3. Overall training data size, modalities and characteristics

	Modalities	Overall size
	☐ Text	Number of tokens or bytes
	☐ Image	Number images (or pairs with other media)
	☐ Video	Number of minutes (or pairs with other media)
	☐ Audio	Number of minutes (or pairs with other media)
	☐ Other	____[please specify]

- Description of the **linguistic, regional, demographic and other relevant characteristics** of the overall training data:

  _____

Text	Image	Video	Audio
☐ Fictional texts, literature ☐ Scientific and educative texts ☐ News, journalism and opinions ☐ Legal and official documents ☐ Social communication (e.g.messages) ☐ Promotion, advertising, product and service reviews ☐ Other text	☐ Photography ☐ Paintings & fine-arts ☐ Infographics ☐ Illustration & graphic design ☐ Social / personal images **Special** ☐ Source code ☐ Structured data (e.g. calendar, maps) ☐ Other, describe:	☐ Movies, shows, performances ☐ Animated video content ☐ Video game & immersive footage (e.g. 3D) ☐ Documentaries ☐ Video news and journalism ☐ User content, short videos ☐ Other video content (e.g. experimental art, video effects)	☐ Music ☐ Narrative and fiction (e.g. audiobooks) ☐ Non-fiction educative audio content ☐ Radio shows and podcasts ☐ Social communication (phone calls, voice messages) ☐ Other (e.g. sounds and ambient)

3. AI Office's approach to the template

Section 2 List of data sources

2. List of Data Sources

2.1. Publicly accessible datasets:

- Overall size per modality and number of all datasets (number of synthetic datasets)
- List of 'main/large' datasets (above 5% of the overall data in this category) with unique identification, links + period of collection

2.2. Private non-publicly accessible datasets of third parties:

- Data licensed by rightholders or their representatives: Overall size per modality
- Datasets acquired from other third parties: Overall size per modality and number of datasets (number of synthetic datasets)
- List of 'main/large' private data sets acquired from other third parties (above 5% of the overall data in this category), unique identifiers and links (if available) and narrative description + period of collection

2.3. Data crawled and scraped from online sources:

- Overall size per modality, period of scraping
- Identification of crawlers, their purpose and behaviour;
- Explanation what content has been targeted;
- List of top 10 % of all internet domain names per type of data modality (e.g., text, image).
- For SMEs top 5 % or 1 000 internet domain names regardless of data modalities, whichever is lower, unless the model is with systemic risks.

2.4. User-sourced data (collected by provider incl. prompts):

- Overall size per modality
- List of providers' services/products

2.5. Self-sourced synthetic data(sets):

- Overall size per modality
- Name of AI model

2.6. Data acquired by the provider through other means:

- Overall size per modality
- Means of acquisition

3. AI Office's approach to the template

Section 3 Relevant data processing

3. Other Relevant Data Processing Aspects

2.1. Respect of copyright and related rights

- Measures implemented to respect reservations of rights from the text and data-mining exception under Art.4(3) DSM Directive **during** data collection incl. specification of the opt-out protocols and solutions honoured by the provider

- Measures implemented **after** data collection is completed to identify and remove content for which rights have been reserved by the rightsholders

2.2. Removal of unwanted content

- Describe content deemed unwanted by the provider as part of the training data

- List the measures taken to avoid and/or remove such content (such as blacklists, keywords, and model-based classifiers)

- Measures applied by the curators of listed datasets may be mentioned, but do not need to be listed exhaustively

4. Feedback from stakeholders

Questions for feedback

What are your views about the AI Office's outlined approach to introducing the following categories and type of information in the template:

1. *General information about the provider, the model and the training data (e.g. overall size and per modalities, characteristics, cut-off date)*
2. *Disclosure of information for all types of sources (e.g. publicly accessible datasets, private datasets, scraped data etc.) with a layered granularity of details*
3. *Data processing aspects essential for legitimate parties (information on measures implemented to respect TDM opt out and removal of unwanted content)*

Stakeholders are invited to send written feedback via email (500 words max.) at aiofficesupport@intelleraconsulting.com:
Deadline by 31 January 2025 at 12:00 PM CET