

From Click to Call: AI in Action for Interreg

AI Regulation & Digital Sovereignty: Rules, Rights, and Readiness

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Interact



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AI Regulation

- **EU AI Act – Regulation (EU) 2024/1689:**
entered into force 1 August 2024
- **Risk-based approach:** obligations depend on how AI is used and the risks involved
- **AI Omnibus – Regulation (EU) 2026/1744:**
entered into force 27 July 2026
 - simplifies and adjusts the implementation
 - introduces new obligations and prohibited practices

The AI Act's risk-based approach

Risk level	Description	Legal consequence
Unacceptable risk	AI practices posing unacceptable risks to rights, safety or dignity	Prohibited in the EU
High-risk	AI used in sensitive areas that may significantly affect people's rights or access to important services	Strict requirements concerning risk management, data governance, documentation, logging, transparency, security and human oversight.
Limited risk	AI systems that interact with people or generate content	Specific transparency obligations, such as informing users when they are interacting with AI or viewing certain AI-generated content
Minimal or no risk	Applies to the majority of AI systems: spam filters, translation tools, internal analytics	No specific AI Act obligations. Other laws, such as GDPR, may still apply.

Risk-levels of Interreg AI use cases

AI use case	Potential risk level
Translating programme documents	Minimal/no risk
Summarising applications	Minimal/no risk
Analysing programme data	Minimal/no risk
Applicant chatbot	Limited risk / transparency
Generating automated public communications	Limited risk / transparency
Recruiting programme staff	Potentially high-risk

Who is responsible? Provider vs. deployer

Provider

Develops an AI system (or commissions it) and places it on the market

Heavy burden of compliance, testing and registration

Interreg programmes can become a provider, if building their own system or substantially modifying an existing AI system.

Deployer

Using an AI system under their own authority (usually buying or licensing)

Focus on safe usage, transparency and oversight

This is the typical role of Interreg programmes.

AI literacy

In accordance with Article 4 AI Act providers and deployers shall take measures to support the development of AI literacy of their staff and other persons dealing with the operation and use of AI systems.

Tool knowledge

What can a specific AI system actually do?
What has to be taken into consideration when working with it?

Risk awareness

Does the work process touch on personal data, copyright, or decisions on natural persons?

Organisational rules

What are internal approval steps to use AI? When is human review mandatory?

AI Transparency

Deepfakes and realistic synthetic content

Article 50 requires deployers using AI to generate/manipulate image, audio or video constituting a deepfake to **disclose that the content has been artificially generated or manipulated**.

This is directly relevant to:

- **generated photographs of people;**
- **voice cloning;**
- **fake interviews;**
- **manipulated video;**
- **realistic depictions of events that never happened.**

But: Not every AI-generated illustration is legally a "deepfake." The AI Act does not require a label on every AI image.

AI-generated public-interest text

A transparency requirement for AI-generated/manipulated text published to inform the public on matters of public interest.

Importantly, the Act contains an exception where the content has undergone **human review/editorial control and a natural or legal person holds editorial responsibility**.



AI GENERATED

AI MODIFIED

Additional legal requirements

- GDPR – EU data protection rules
- Copyright – EU copyright rules

Responsible AI – to wrap up

Prefer genuine project photos/visuals first

Use AI to edit/modify the project visual based on your design need. Use exclusively AI-generated images in absence of genuine ones.

Careful with licencing

Free to experiment ≠ automatically licensed for official publication.

Privacy

GDPR applies to you work with AI. Do not share identifiable people's information with AI, the same way you wouldn't share them with third party people.

Don't let AI generate official visuals

AI is poor ground for authoritative visual facts such as maps, flags, logos and required text; add these accurately at the design stage.

Be transparent

Transparency is not an apology for using AI. It is information about source/process.

Human review

Using AI does not transfer responsibility to AI. The person or organisation publishing the content remains responsible for what it communicates.

If Photoshop makes it possible to create a misleading visual, we don't blame Photoshop for publishing it but the person who published it. AI should be treated the same way.

Group discussion

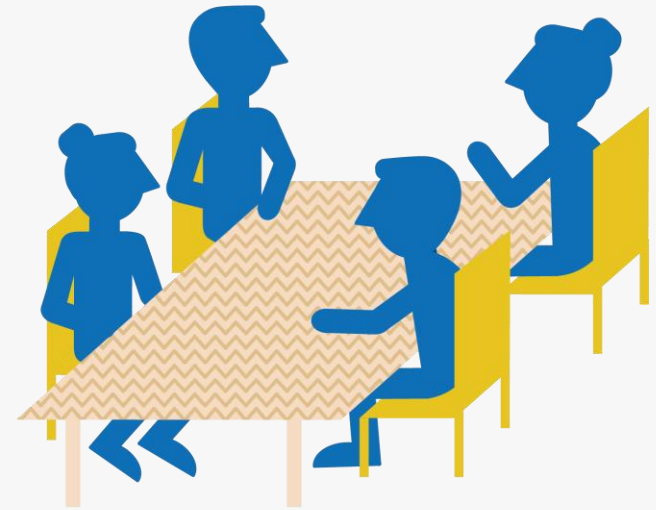
Assign a group reporter and discuss:

Practical solutions to challenges in programme work

- How do you address the concrete challenges brought by the legal framework? (not only AI Act, but also GDPR, copyright, other)
- Beyond legal requirements: what other considerations in order to use AI responsibly?

Guidance towards applicants and beneficiaries

- what do you tell them to do & not to do – now
- what do you foresee?



Cooperation works

All materials will be available on:
Interact.eu/Library

Want to discuss it? Join our MS Teams environment!
Portal.Interact.eu | Programme and Project Management

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