

With the European Union's AI Act making waves across the tech industry, product teams and legal departments are scrambling to understand exactly what transparency expectations lie ahead. Among the hot topics: does the EU AI Act mandate placing an "AI" label on every AI-generated message or interaction? For companies like Coruzant Technologies, who serve global customers with accessible B2B SaaS tools, and for policymakers like the European Commission and the European Data Protection Supervisor, clarity is critical — especially when it comes to users relying on assistive technologies such as screen readers and voice product interfaces.

Understanding the EU AI Act Article 50 Transparency Requirement

The cornerstone of this discussion is **Article 50** of the proposed AI Act. <https://coruzant.com/ai/ai-transparency-design-problem/> Article 50 establishes that users must be clearly informed when they are interacting with an AI system, often referred to as "interaction disclosure." This mandate aims to ensure users are not misled about whether they are engaging with a human or a machine, thereby promoting informed consent and trust in AI-driven systems.

Specifically, Article 50 states that providers of AI systems must implement *appropriate measures* to make this disclosure clear, which might include labels, notifications, or other UI elements. But what does that look like in practice? Is slapping the label "AI" on every single message the right move? Let's deep-dive into the nuances.

Provider vs Deployer: Who Holds the Transparency Responsibility?

One critical distinction the EU AI Act draws is between the **provider** and the **deployer** of an AI system. This split affects responsibility for interaction disclosure:

- **Providers** are the entities who develop, program, or supply the AI system. They must ensure the AI system includes mechanisms to facilitate transparency — for example, embedding disclosures in the system architecture or providing documentation on how users are notified.
- **Deployers** are the organizations implementing or integrating the AI system into their products or services. They bear responsibility for making sure interaction disclosure is actually presented to end users during real-world use.

This means even if Coruzant Technologies creates a conversational AI engine with embedded disclosure capabilities, a client deploying that engine in their customer support chat must still configure their UI so users see or hear the transparency disclosures as appropriate. The legislative text emphasizes collaborative responsibility, rather than placing the entire burden on a single party.

Implications for User Experience Designs

Product teams must coordinate closely with legal and compliance teams to address this provider-deployer split. For example, the European Commission underscores that interaction disclosure should not severely disrupt workflow or compromise UI accessibility. Instead, it encourages "appropriate measures," which could include:

- Introductory messages before starting AI-driven conversations
- Screen reader-friendly alerts announcing AI interaction at the start
- Consistent voice prompts in voice product interfaces indicating AI presence
- Contextual labels or icons that support accessibility standards

Over-labeling every single AI-generated message can lead to “disclosure fatigue” and detract from usability — a risk especially salient for users relying on screen readers where verbose or redundant announcements degrade experience.

Extraterritorial Reach: What About Non-EU Companies?

Global providers like Coruzant Technologies often operate across the EU and beyond, and the EU AI Act’s extraterritorial reach means even companies outside the EU must comply when serving EU users. Article 3 clarifies that if an AI system is “placed on the market” or “put into service” in the Union, the Act applies regardless of the provider’s location.

This extraterritorial scope has significant implications for product managers and UX writers crafting interaction disclosures. For instance, a SaaS customer support tool deployed by a U.S.-based company but servicing EU users must embed EU-compliant transparency measures in their UI labeling choices to avoid enforcement risk.

The European Data Protection Supervisor highlights the importance of harmonized standards in labeling, noting that “users should receive consistent, meaningful transparency about AI interactions no matter where the underlying technology or vendor is based.”

When Must the Interaction Disclosure Occur?

Timing is another key compliance aspect. EU regulators are clear that interaction disclosure should happen at or before **first contact** with the user:

1. The first message or prompt from the AI system should indicate it is powered by AI technology, rather than a human.
2. This disclosure can be delivered via text banners, audio prompts in voice product interfaces, or accessible announcements for screen readers.
3. Subsequent messages may not require repetitive “AI” labeling if the initial disclosure is clear and users understand the nature of the system.

This approach balances legal obligations with user experience — avoiding the pitfalls of both hidden disclosures buried deep in terms of service and excessive repetitive labeling that hampers conversational flow.

Accessibility Considerations in UI Labeling Choices

For users who rely on assistive technology, like screen readers, labeling choices must be carefully designed. Simply visually displaying “AI-powered” text is insufficient if those cues are not programmatically linked or announced accessibly.

Best practices include:

- Ensuring labels and disclosures are included in the accessible name or description of UI elements
- Designing voice prompts that explicitly announce the AI nature of the interaction early on
- Coordinating with accessibility teams to test disclosures across different assistive technologies

Coruzant Technologies and other leaders in SaaS voice products recommend reading UI copy aloud, mimicking a voice assistant, to validate that interaction disclosures feel natural and helpful rather than intrusive or confusing.

Summary Table: Key Points on EU AI Act Interaction Disclosure

Aspect Key Takeaway Example Article 50 Requirement Users must be clearly informed when interacting with AI systems. First message states, “You are chatting with an AI assistant.” Provider vs Deployer Providers embed disclosure mechanisms; deployers ensure users actually see/hear them. Coruzant builds disclosure feature; client configures UI to activate it. Extraterritorial Coverage Non-EU companies must comply if serving EU users. US-based SaaS must display EU-compliant AI disclosures for EU customers. Disclosure Timing Disclosure at first interaction, not repeated on every message. Initial voice prompt identifies AI; subsequent messages omit repeated labels. Accessibility Disclosures must be screen reader and voice interface friendly. Aria-labels and voice prompts announce AI presence clearly.

Conclusion: Thoughtful Transparency Over Redundant “AI” Labels

The EU AI Act’s Article 50 unequivocally requires user transparency about AI interactions, but it does not explicitly mandate an “AI” label on every single message. Instead, it calls for *appropriate measures* — a balanced approach that respects both user awareness and usability, while factoring in accessibility needs for screen readers and voice interfaces.

Providers like Coruzant Technologies and compliance bodies such as the European Commission advocate for upfront disclosures at first contact, followed by consistent but not repetitive transparency cues. This approach ensures users know they’re interacting with AI from the start, without undermining the user experience.

In practice, smart UI labeling choices involve collaboration between product, legal, and accessibility teams focusing on clarity and inclusivity. As the EU AI Act moves toward implementation, companies serving EU markets—whether based inside or outside Europe—should begin auditing their interaction disclosure strategies today.





Remember: transparency isn't just a checkbox in the UI, it's foundational to trust and ethical AI use.