Issuance of the Measures for the Identification of AI-Generated Synthetic Content and Accompanying Mandatory National Standard

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1. Policy Background

To advance a **trustworthy AI governance ecosystem**, China's Cyberspace Administration (CAC), alongside the Ministry of Industry and Information Technology (MIIT), the Ministry of Public Security (MPS), and the National Radio and Television Administration (NRTA), has promulgated the **Measures for the Identification of AI-Generated Synthetic Content** [1](*the Measures*), effective **September 1, 2025**. The accompanying mandatory national standard **GB 45438-2025** (*Cybersecurity Technology – AI-Generated Content Identification Methods*[2]) will synchronously take effect.

These new regulations establish a **comprehensive identification framework** covering the entire lifecycle of AI-generated content—**from production to dissemination and usage**—marking a shift in China's AI content governance from mere formal compliance to **technical trustworthiness**.

2. Key Highlights

2.1 Scope of Application

(1) **Applicable Entities**: Network information service providers that fall under the *Regulations on Algorithmic Recommendation Management*[3], *Regulations on Deep Synthesis Management*[4], and *Interim Measures for Generative AI Services*[5].

(2) **Applicable Content**: AI-generated **text, images, audio, video, virtual environments**, and other synthetic information.

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[1] 《人工智能生成合成内容标识办法》
[2] GB 45438-2025《网络安全技术 人工智能生成合成内容标识方法》
[3] 《算法推荐管理规定》
[4] 《深度合成管理规定》
[5] 《生成式 AI 服务暂行办法》

2.2 Dual-Track Labeling System

Label Type	Function	Technical Requirements	Examples
Explicit Label	Clearly indicate content origin	-Embedded prominently in the content or interface -Supports multimodal presentation (text, graphics, voice)	Video watermark, text overlay, audio disclaimer
Implicit Label	Ensure traceability and anti-counterfeiting	- Embedded in file metadata -Stored using tamper- proof technologies	EXIF data, blockchain certification

2.3 Compliance Requirements Throughout the Lifecycle

(1) Production Stage

Service providers must add:
- **Explicit Labels**: Clearly displayed on the AI-generated content such as text, audio, pictures, videos, virtual scenes, etc. as required (e.g., first frame of a video marked "AI-generated").
- **Implicit Labels**: Metadata must record, including the generation time, model version, responsible entity, etc.

(2) Dissemination Stage
- **Content platforms**: Must verify implicit labels and provide explicit notices upon publication (e.g., "This content contains AI-generated elements").
- **Distribution platforms**: Must ensure service providers' labeling technology complies with regulations during content approval.

(3) Usage Stage
- **Users uploading AI-generated content** must proactively declare it and use platform labeling tools.
- **Tampering with, deleting, or circumventing identification measures is strictly prohibited.**

2.4 Key Requirements of the Mandatory National Standard (GB 45438-2025)

(1) Format Specifications: Explicit label font size/position, implicit label metadata fields (mandatory fields include content creator, model ID, timestamp).

(2) Tamper-Resistance Mechanisms: Cryptographic hashing, digital signatures to ensure label integrity.

(3) Detection Interface: Platforms must provide an API for regulatory agencies to verify labels.

2.5 Compliance Timeline

Deadline	Key Compliance Task
By June 30, 2025	Complete adaptation to labeling technology and update internal policies

From September 1, 2025	Fully implement dual-track labeling and end-to-end compliance

3. Conclusion & Practical Compliance Recommendations

The Measures for the Identification of AI-Generated Synthetic Content and GB 45438-2025 introduce strict technical and regulatory obligations for businesses operating in the AI content ecosystem. To ensure seamless adaptation before the September 2025 deadline, companies should proactively implement robust labeling mechanisms, update compliance frameworks, and engage with industry bodies.
Below are some key recommendations:

3.1 Technical Implementation

(1) Deploy Automated Labeling Tools:
➔ Integrate SDKs/APIs compliant with GB 45438-2025 (e.g., Baidu's AIGC Tagger, Alibaba's MetaWatermark) to automate explicit/implicit label embedding.

➔ For explicit labels, adopt platform-specific formats:
- *Text*: Insert headers/footers (e.g., "Generated by AI").
- *Images*: Add corner watermarks (e.g., translucent "AI-Generated" logo).
- *Video*: Include a 3-second disclaimer overlay (e.g., "This video contains AI-generated content").
- *Audio*: Embed voice announcements (e.g., "This audio was synthesized using AI").

➔ For implicit labels, use metadata templates with mandatory fields: creator, model_ID, timestamp.

(2) Implement Tamper-Proof Solutions:
➔ Use blockchain-based certification (e.g., Tencent's ChainTrust) or RFC 3161-compliant digital timestamps for metadata integrity.

3.2 Operation Adjustment

- Modify content creation pipelines to include labelling, ensuring compliance at every stage.
- Conduct manual secondary review for high-risk content (such as virtual scenes and synthetic portraits of political figures)

3.3 Updates to the Agreement and Privacy Policy

- Introduce an *AI-Generated Content Identification Clause* in user agreements, outlining users' obligations for label compliance.
- Clarify the scope and purpose of metadata collection in privacy policies to mitigate risks of excessive data collection claims.

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