AI Content Editorial Review Policy

A working compliance document for independent content creators

EU AI Act, Article 50 | Effective 2 August 2026

Document owner	*Your name*
Publication / platform	*e.g. Substack newsletter, personal blog, Medium*
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Guidance note: Keep this document on file and update it whenever your workflow changes. You do not need to publish it, but you should be able to produce it if a regulator or platform asks for evidence of editorial responsibility. A copy stored in cloud storage (Google Drive, Dropbox, etc.) with version history is sufficient.

Section 1: Purpose and legal basis

1.1 Why this document exists

Article 50 of the EU AI Act (Regulation (EU) 2024/1689) requires deployers of AI systems to label certain AI-generated content when publishing to audiences that include EU readers. This obligation takes legal effect on 2 August 2026.

This document records the editorial review process I apply to AI-assisted content. Its purpose is to support reliance on the editorial review exception in Article 50(4), which states that the labeling obligation does not apply where AI-generated content has undergone a process of

human review or editorial control and where a natural or legal person holds editorial responsibility for the publication.

Guidance note: The editorial review exception is real, but the EU AI Act and the supporting Code of Practice make clear it requires a documented, genuine process. A written policy like this one is the evidence you would need to demonstrate that exception applies. Without documentation, the default is that labeling is required.

1.2 Scope of this policy

This policy applies to all content I publish under my name or under my publication, including but not limited to:

- Newsletter issues and posts published via Substack, Beehiiv, Mailchimp, or equivalent
- Blog posts and articles published to any website I own or control
- Posts cross-published to Medium or other third-party platforms
- Social media posts containing AI-generated images, audio, or video
- Any other content directed at a public audience that includes EU readers

1.3 Who this policy covers

I am the sole author and editor of my publication. I am the natural person who holds editorial responsibility for all content published under this policy.

Section 2: How I use AI in my content workflow

2.1 How AI tools are used in my workflow

Complete the table below to describe your actual use of AI. Be specific. Vague descriptions like "AI assists with writing" are less useful as evidence than concrete descriptions of what the tool does and what you do afterwards.

Content type	AI tool used (if any)	My role in the process
Written articles / newsletters	*e.g. Claude, ChatGPT, Gemini, none*	*e.g. I write all drafts myself / I use AI for a first draft and rewrite substantially / I use AI for research summaries only*
Images	*e.g. Midjourney, DALL-E, Adobe Firefly, none*	*e.g. I select and review all images before publication*
Audio / video		

Other (specify)		

Section 3: My editorial review process for text

3.1 What counts as editorial review

For the purposes of this policy and the Article 50(4) exception, editorial review means a genuine process of reading, assessing, and taking responsibility for the content before publication. It is not a superficial check. The review must be substantive enough that I, as editor, can stand behind the content as my own.

Guidance note: The EU AI Act's Code of Practice (second draft, March 2026) requires that the editorial review exception be supported by documented procedures identifying the person responsible, an overview of the review process, and the human resources allocated. For a solo creator, this section of the policy is that documentation.

3.2 My review steps for AI-assisted text

Describe the steps you actually take. The following is a suggested framework. Edit it to match your real process.

1. Source and framing: I determine the topic, angle, and key arguments before any AI tool is involved. The editorial direction is mine.
2. AI use (where applicable): If I use an AI tool to generate a draft or research summary, I treat this as raw material, not finished copy.
3. Read and assess: I read the full draft. I check factual claims against primary sources. I identify any material I cannot independently verify and either verify it or remove it.
4. Rewrite and edit: I rewrite for voice, accuracy, and structure. I do not publish AI text verbatim. The published version reflects my editorial judgement.
5. Final check: Before publishing, I confirm I am satisfied that the content is accurate, that I understand and agree with every substantive claim, and that I take responsibility for it.

3.3 What I do when AI use is more than incidental

If an AI tool has generated a substantial portion of the original draft (more than roughly half the text before my editing), I apply additional scrutiny:

- I verify all statistics, quotes, and named references independently.
- I rewrite at least one complete section from scratch to ensure the voice is mine.

- I ask myself whether I would be comfortable attributing every claim in the piece to myself by name. If the answer is no, I revise until it is.

3.4 Labeling decision

After review, I make an explicit decision on labeling for each piece:

Scenario	My approach
No AI used in text	No label required.
AI used for research/drafting; I have reviewed and edited substantively per Section 3.2	Editorial review exception applies. No label required. This policy is the supporting documentation.
AI-generated text published with minimal or no editing	Label required if content is on matters of public interest. Label to be placed at the top of the piece before first exposure.

Section 4: Images, audio, and video

4.1 AI-generated images

The editorial review exception in Article 50(4) applies only to text. There is no equivalent exception for AI-generated images, audio, or video. If I generate or substantially manipulate visual or audio content using AI and that content could be mistaken for a real photograph, recording, or genuine likeness of a real person, I must label it.

Guidance note: The law carves out space for content that is obviously artistic, satirical, or fictional, where the requirement is lighter. A clearly stylized AI illustration is treated differently from an AI-generated photo designed to look like a real photograph. If there is any doubt, label it.

4.2 My image labeling approach

Describe what you do. Examples below.

- Where I generate images using AI tools (e.g. Midjourney, DALL-E, Adobe Firefly), I add a label reading 'Generated with AI' in the image caption or immediately adjacent to the image.
- Where I use AI to edit or substantially alter a photograph (e.g. background replacement, face modification, composite imagery), I label the result as 'Manipulated with AI'.

- Where I use AI only for minor, non-deceptive editing (e.g. background removal on a product photo, basic colour correction), I assess on a case-by-case basis whether labeling is required. If the result could be mistaken for an unedited photograph, I label it.

4.3 Audio and video

If I produce AI-generated or AI-manipulated audio or video content (including AI voiceovers, synthetic presenters, or deepfake-style edits), I label it clearly at the point of first exposure. For longer-form audio or video, I repeat the disclosure during the content at reasonable intervals.

Section 5: Label format and placement

5.1 Label wording

Pending final guidance from the EU AI Office (expected Q2 2026), I use the following standard wording:

Content type	Label wording I use
AI-generated text (not reviewed)	*'This article was generated with AI assistance.'*
AI-generated image	*'Image: Generated with AI'*
AI-manipulated image	*'Image: Manipulated with AI'*
AI-generated audio/video	*'This content was generated with AI. [Repeated at intervals]'*
Deepfake or realistic synthetic likeness	*'This content is artificially generated and does not depict a real event or person.'*

Guidance note: The EU's Code of Practice on AI-generated content (final version expected June 2026) will specify a standard EU 'AI' visual icon. When that icon is published, I will adopt it in place of or alongside the text labels above. Check the EU AI Office website at digital-strategy.ec.europa.eu for updates.

5.2 Placement

- Text labels: at the top of the article or in the byline, visible before the reader encounters the main content.
- Image labels: in the caption directly below the image, or as an overlay if the platform does not support captions.
- Audio/video labels: audible or visible at the start of the content, and repeated if the content runs longer than a few minutes.

Section 6: Responsibility and record-keeping

6.1 Editorial responsibility

I am the natural person with editorial responsibility for all content published under this policy. My contact details for the purposes of this policy are:

Full name	
Email address	
Publication name	
Publication URL	

Guidance note: Article 50(4) and the Code of Practice require that the person with editorial responsibility be identifiable. The information above is the minimum you need to record. You do not need to publish it, but you should be able to provide it if asked.

6.2 How I keep records

I keep records of my editorial review process in the following way:

Describe your actual record-keeping. Examples:

- I keep a saved copy of any AI-generated draft alongside the final published version, in a dedicated folder in [Google Drive / Dropbox / local storage].
- I record the date of publication, the AI tool used (if any), and the nature of my review in a simple log (see Appendix A).
- I retain these records for a minimum of [2 years / 3 years] from the date of publication.

6.3 Policy review

I will review this policy whenever my workflow changes materially, and at least once every 12 months. The version history is recorded in the table on the cover page.

Appendix A: Content log

Use this log to record each piece of content where AI tools were involved. You do not need to log content where no AI was used.

Date	Article / content title	AI tool(s) used	Nature of AI use	Label applied / exception relied on

Appendix B: Quick reference checklist

Before publishing any piece of content, run through this checklist.

	Pre-publication checklist
☐	Did I use any AI tool in producing this content (text, image, audio, or video)?
☐	If AI was used for text: have I read and edited the full piece, verified all factual claims, and am I comfortable taking editorial responsibility for every statement?
☐	If AI was used for images: does the image look realistic enough to be mistaken for a real photograph? If yes, have I added a label?
☐	If AI was used for audio or video: have I added a label at the point of first exposure?
☐	Have I recorded this piece in the content log (Appendix A)?
☐	Is the label (if required) placed where it will be seen before the reader/viewer encounters the main content?

Disclaimer

This template is provided for informational purposes only and does not constitute legal advice. It is intended to help independent content creators build a documented editorial process in preparation for the EU AI Act's Article 50 transparency obligations. The legal position for individual creators may vary depending on their specific activities, audience, and jurisdiction. If you have questions about your compliance obligations, consult a qualified lawyer with expertise in EU technology law.