

FOR MCP PROVIDERS · EU AI ACT ARTICLE 50 · IN APPLICATION SINCE 2 AUGUST 2026

Your MCP isn't automatically in Article 50 scope.

The agents using it may be.

Enterprise buyers can need a fast answer to three questions: **which agent is this, who operates it, and what evidence stands behind it?** ECZ-ID provides a portable identity-and-evidence layer that can be re-checked without replacing OAuth, your gateway or your local policy.

ECZ-ID EVIDENCE PROFILE

ILLUSTRATIVE · SYNTHETIC

AI SYSTEM / AGENT	Customer support agent "Aria"
IDENTITY	agent:ecz:demo-a50-0001
OPERATOR / PRINCIPAL	Example Retail Ltd
ARTICLE 50 EVIDENCE	Interaction disclosure · customer-declared
DISCLOSURE EVIDENCE	First-interaction notice captured
PROVENANCE	Output marking method recorded
LAST REVIEWED	5 August 2026
CURRENT STATE	Published · re-checkable

```
{ "agent": "ecz:demo-a50-0001", "state": "published", "reviewed": "2026-08-05" }
```

2 Aug 2026

Article 50 transparency obligations apply under Article 113.

2 Dec 2026

Limited Article 50(2) marking transition ends for qualifying earlier systems.

5 duties

Role-dependent duties in Article 50(1)-(5). Most organisations carry some, not all.

THE EXECUTIVE QUESTION

Article 50 creates urgency. Procurement creates repetition. The opportunity is to turn identity, operator accountability and supporting evidence into something a buyer can re-check instead of asking for again.

SECTION 1

What Article 50 requires now

Article 50 of the EU AI Act (Regulation (EU) 2024/1689) became applicable on 2 August 2026 under Article 113. It attaches transparency duties to specific roles in specific situations - it is not a blanket obligation on everyone who touches AI.

PROVIDERS · DEVELOP & PLACE ON THE MARKET**Provider duties**

- **50(1)** - design systems intended to interact directly with natural persons so those persons know they are dealing with an AI system, unless that is obvious in context.
- **50(2)** - mark synthetic audio, image, video or text output in a machine-readable format so it is detectable as artificially generated or manipulated.

DEPLOYERS · USE UNDER THEIR OWN AUTHORITY**Deployer duties**

- **50(3)** - inform natural persons exposed to emotion-recognition or biometric-categorisation systems.
- **50(4)** - disclose deep fakes and certain AI-generated public-interest text, subject to the Regulation's exceptions.

2 Aug 2026**IN APPLICATION****Article 50 applies**

Transparency duties for providers and deployers apply. Article 50(5) governs clear, timely disclosure at first interaction or exposure.

2 Dec 2026**LIMITED DEADLINE****Article 50(2) transition ends**

Qualifying generative systems placed on the market before 2 August 2026 must meet the machine-readable marking obligation under Article 111(4).

Read the transition narrowly: it covers only Article 50(2), and only qualifying systems placed on the market before 2 August 2026. Article 50(1), (3), (4) and (5) do not receive that transition.

The Code of Practice on Transparency of AI-generated Content can support implementation of marking and labelling duties. Following a code of practice is not a finding of compliance.

SECTION 2

Five duties. Two roles.

Use this as an executive orientation, not as a substitute for the statutory text. The consolidated Act is the authority and the exceptions matter.

1

Say it is an AI system

PROVIDER

Systems intended to interact directly with natural persons must be designed so people know they are dealing with AI - unless that is obvious to a reasonably well-informed, observant and circumspect person in the circumstances.

2

Mark synthetic content

PROVIDER

Generated audio, image, video and text must be marked in a machine-readable format and detectable as artificially generated or manipulated, as far as technically feasible, with limited exceptions.

3

Disclose emotion & biometric use

DEPLOYER

People exposed to emotion-recognition or biometric-categorisation systems must be informed of their operation, subject to narrow law-enforcement exceptions.

4

Disclose deep fakes & public-interest text

DEPLOYER

Deep-fake media must be disclosed as artificially generated or manipulated; certain AI-generated public-interest text must also be disclosed, subject to exceptions.

5

Disclose clearly, at first contact

BOTH

The information must be clear, distinguishable and provided at the latest at the first interaction or exposure, with applicable accessibility requirements.

+

Other duties continue

CONTEXT

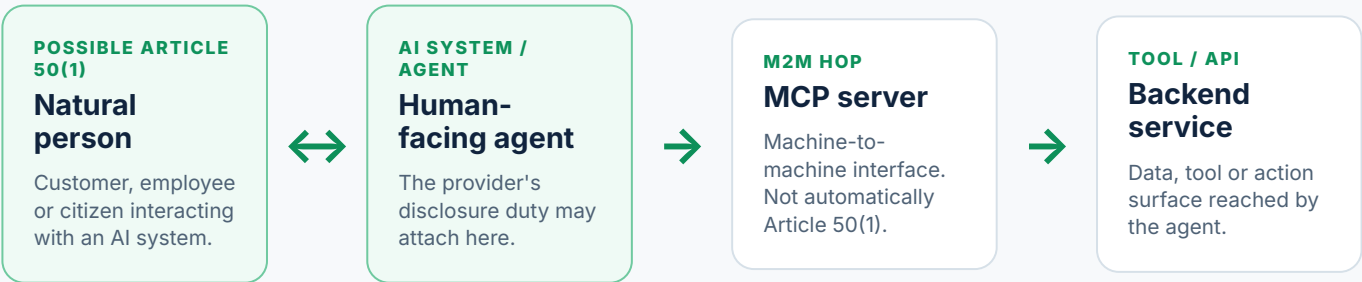
Article 50 sits alongside high-risk and other transparency rules. The Commission encourages codes of practice for detection, marking and labelling of generated content.

Exceptions exist: law-enforcement carve-outs, assistive editing, obvious-in-context interaction, artistic works and editorially controlled text can narrow these duties. Which paragraphs apply is a role-and-use-case question.

SECTION 3

Human interaction and MCP are not the same thing

Article 50(1) attaches to AI systems intended to interact directly with natural persons. That direct human interaction is different from the machine-to-machine hop behind it.



The distinction that matters: operating an MCP server does not automatically place a provider in Article 50 scope. Scope depends on the actual AI system, role and use case.

The accountability questions arrive anyway

Enterprise reviewers often need more than the protocol answer. They need the identity-and-evidence answer.



If every buyer asks the same questions, the scalable answer is evidence that can be published once and independently re-checked later.

SECTION 4

Turn a questionnaire into a reusable evidence stack

Not every field below is a statutory Article 50 requirement. The point is to separate the evidence that supports an Article 50 duty from the wider identity and accountability evidence buyers ask for anyway.

Identity	ACCOUNTABILITY	Accountability	WHO STANDS BEHIND IT
System identity	Stable identifier, version and owner record.	Operator	Who runs the system or agent.
Intended purpose	Customer-declared purpose statement.	Principal	Whose authority it carries.
Model / API reference	Externally referenced model or API documentation.	Responsible contact	Named role and reachable route for questions.

Article 50 support	DUTY EVIDENCE	Freshness & provenance	RE-CHECKABILITY
Disclosure	What users see and when. SUPPORTS ART. 50 DUTY	Review date	Evidence current as of a stated date.
Marking / provenance	Marking method, format notes and test output. SUPPORTS ART. 50 DUTY	Evidence source	Customer-declared vs externally referenced, per field.
		Current state	Published, not published or not assessed.
		Change history	Receipts and dated change entries.

Precision matters: Article 50 obliges disclosure and marking in the situations the Regulation defines - not an ECZ-ID record about them. The wider stack exists because buyers, auditors and platform partners still need a reliable way to answer who, what, when and on whose authority.

SECTION 5

Separate truth, operations and public proof

A PDF attachment gets stale. ECZ-ID separates where evidence is structured, where canonical state is written, where it is projected publicly, and where the relying organisation applies its own policy.



ECZ-ID

What a resolved record can show: what has been published, on what basis, in what state and as of when - with customer-declared and externally referenced facts labelled as such. The relying organisation can re-check the evidence instead of trusting an attachment from last month.

What this makes possible

- One evidence record instead of repeated questionnaire rounds.
- Buyer diligence against current published state rather than a stale attachment.
- Agent and MCP surfaces that can be looked up before reliance.

What it deliberately is not

- Not legal advice or a compliance determination.
- Not certification, approval or a safety statement.
- Not a legal precondition for operating an AI system.

The boundary, plainly: ECZ-ID helps organisations structure, publish and re-check identity, accountability and supporting evidence. It does not itself determine or certify legal compliance.

SECTION 6

A practical 48-hour evidence readiness sprint

You can start with inventory, role triage and evidence capture before taking a view on legal applicability. The goal is to stop rebuilding the same answer for every buyer.

0-24 HOURS**Inventory & triage**

- List every AI system, agent and MCP surface you provide or deploy.
- Mark provider vs deployer and direct human interaction vs background/M2M.
- Flag systems generating synthetic audio, image, video or text.

24-48 HOURS**Capture the evidence**

- Capture first-interaction disclosure evidence for human-facing surfaces.
- Record the marking method and test output for generated content.
- Name one accountable owner for the evidence set.

BY HOUR 48**Make it reusable**

- Assemble the evidence stack from page 5 for the highest-exposure system first.
- Record what is published, not published or not assessed.
- Document any out-of-scope conclusion rather than assuming it.

FIXED-SCOPE PAID ENTRY POINT

MCP Readiness Audit

£395

A human-reviewed assessment of one MCP implementation: protocol conformance, transport behaviour, authorisation boundaries, tool-surface risk and operational readiness. Article 50 or agent-accountability questions can be flagged in the written intake; fit within the agreed MCP assessment boundary is confirmed in writing before work begins.

[REVIEW SCOPE & START →](#)

MCP readiness assessment only. Not a legal applicability assessment, not an Article 50 compliance determination, and not certification.



SECTION 7

Choose the next step

Start with the provider-side posture you need, then give the agents using your surface a path to stronger identity and operator evidence. Prices below are the current published monthly prices.

For MCP providers

ECZ-ID MCP Verifier™

Free

Machine-readable checker. No paid checkout.

ECZ-ID MCP Assurance™

£199/mo

Provider-side recurring evidence posture.

ECZ-ID MCP Assurance Plus™

£499/mo

Broader provider-side evidence posture.

ECZ-ID MCP Policy™

£1,499/mo

Buyer-side local policy expression under the buyer's own authority.

For agents & operators

ECZ-ID Agent Credential Entry Pack™

£24.99/mo

Agent identity linked to an accountable parent. Not KYA or agent safety proof.

KYA Starter™

£34.99/mo

Operator and authority evidence for the agent.

Verified KYA Ready Pack™

£149.97/mo

Verified-tier operator evidence posture.

Assured KYA Ready Pack™

£179.97/mo

Assured-tier operator evidence posture.

Acquire and operate through TrustOps

trustops.ecocitizenz.com/start

Free Article 50 briefing · mcp.ecocitizenz.com/article50

Free MCP scanner · mcp.ecocitizenz.com/scan

Primary sources

1. Regulation (EU) 2024/1689 - EU AI Act

<https://eur-lex.europa.eu/eli/reg/2024/1689/oj/eng>

2. Regulation (EU) 2026/1744 - Digital Omnibus on AI

<https://eur-lex.europa.eu/eli/reg/2026/1744/oj/eng>

3. Consolidated EU AI Act - 27 July 2026

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02024R1689-20260727>

4. European Commission FAQ - Article 50 transparency

<https://digital-strategy.ec.europa.eu/en/faqs/transparency-obligations-under-article-50-ai-act>

5. Commission Code of Practice on Transparency of AI-generated Content

<https://digital-strategy.ec.europa.eu/en/policies/code-practice-ai-generated-content>

Method & limitations: educational material prepared from the primary sources above as at 5 August 2026. It is not legal advice, not a compliance determination and not a substitute for advice on a specific system or use case. Article 50 duties depend on role and situation; exceptions apply. Following a code of practice is not a finding of compliance. ECZ-ID helps organisations structure, publish and re-check identity, accountability and supporting evidence; it does not itself determine or certify legal compliance.

Extend the evidence stack

ECZ-ID Business Passport organisation identity foundation

ECZ-ID AI Model Passport model identity and evidence

ECZ-ID Software Supply Chain Passport software lineage

Not every system needs every credential, and Article 50 does not require these ECZ-ID products. Start with the evidence gap your customers ask about.

ECZ-ID API Passport API and action identity

ECZ-ID Dataset Passport dataset provenance

ECZ-ID Cyber Resilience Passport cyber posture evidence