Digital Policy Alert

How Governments Address AI Transparency

Tommaso Giardini and Nils Deeg

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In the second half of 2026, two leading AI labs, Anthropic and OpenAI, announced watermarking mechanisms for text written by their AI systems. Both firms highlighted the EU AI Act as the reason. Anthropic mentioned that it would apply watermarks globally at launch given the absence of a durable way to scope it by region.

Governments worldwide are concerned with the opacity of AI systems, because a lack of transparency can prevent users from making informed choices and government authorities from overseeing AI systems. Governments thus require AI firms to increase transparency about the use and functioning of AI systems, as well as the output of their systems, among others.

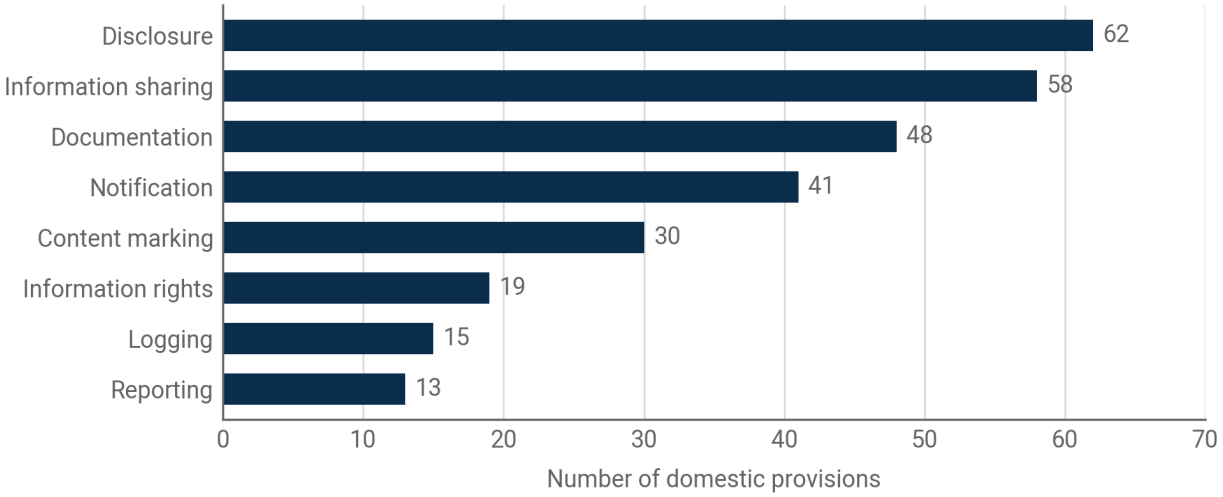
Domestic Regulation

Transparency is a common concern in domestic AI regulation: The DPA has documented 198 domestic policy and enforcement developments tackling AI transparency since January 2020. The DPA's systematic monitoring reveals the following trends in AI transparency regulation:

- The US is the most active jurisdiction, with 42 state-level and 29 federal developments, followed by China (19), the EU (16) and the Republic of Korea (12).
- The current status of developments is diverse: 79 developments are in force or adopted, 101 are currently under deliberation and 18 are concluded, rejected or revoked.
- A large majority of transparency rules are established in binding laws (123) or binding orders (36), compared to 32 non-binding guidelines and 7 enforcement cases and inquiries.

Recently, in August 2026, transparency obligations in the California AI Transparency Act and the EU AI Act took effect. In addition, Indonesia's Ministry of Communication and Digital Affairs announced that it was considering regulations regarding the labelling of AI-generated digital media content, while the Republic of Korea's Fair Trade Commission held a consultation on proposed guidelines on AI labelling and advertising.

Our text-level analysis of 84 rulebooks across 19 jurisdictions reveals how governments approach AI transparency in detail. We identified eight different regulatory requirements that appeared 286 times, namely: the prominent disclosure that AI is in use (62 provisions), sharing information on how AI systems work and should be used (58), documentation of information on AI systems and their development (48), notification of regulators or affected parties after incidents (41), marking AI-generated content through labels or watermarks (30), giving users information rights, such as an explanation of AI-assisted decisions (19), logging system inputs, outputs, and events (15), and periodic reporting on AI systems to regulators or the public (13).



International Coordination

Our text-level analysis of nine international AI frameworks shows that all cover transparency across 47 provisions. The frameworks address several of the regulatory requirements identified at the domestic level. The most commonly mentioned requirements are disclosure (9), documentation (8), and information sharing (8), followed by information rights (7). Content marking (6), notification (5), and reporting (4) are less common. Finally, logging is only explicitly mentioned in the ASEAN Guide.

Framework	Disclosure	Information sharing	Documentation	Information rights	Content marking	Notification	Reporting	Logging
ASEAN Expanded Guide (Generative AI)	■	■	■	■	■	■	–	–
ASEAN Guide	■	■	■	■	–	–	–	■
Council of Europe Framework Convention	■	–	■	■	■	–	–	–
G7 Hiroshima Code of Conduct	■	■	■	–	■	■	■	–
G7 Hiroshima Guiding Principles	■	■	■	–	■	■	■	–
Joint Declaration	■	■	■	■	■	■	■	–
OECD AI Principles	■	■	■	■	–	–	–	–
UNESCO Recommendation	■	■	■	■	–	■	–	–
UNGA Resolution	■	■	–	■	■	–	■	–

International AI frameworks, however, differ in how they focus on transparency and how actionable their language is. Of the 47 provisions, 23 focus on transparency as the core concern, while 24 only touch upon transparency tangentially. 42 provisions provide actionable language, and only five

address transparency in non-actionable language (in the G7 documents, the Joint Declaration and the UN General Assembly resolution).

Alignment Between Domestic and International Action

Domestic regulations and international frameworks mostly address AI transparency in similar fashion. Disclosure, information sharing and documentation are the three most common requirements at both levels. The two levels diverge on logging and information rights: logging is a routine domestic requirement but appears in only one framework, while information rights rank sixth domestically yet appear in seven international frameworks. Regarding notification, content marking and reporting, the two levels are roughly aligned. The international language behind this overlap is largely concrete. Nearly all provisions are actionable, although only about half are mainly about transparency.

To understand how governments tackle AI transparency in depth, readers can explore our AI Governance Hub's transparency page. It shows the relevant DPA entries and the full-text provisions of domestic AI regulations and international AI frameworks, structured using our taxonomy. The page draws data from the DPA's Activity Tracker, which provides daily updates on digital policy and provides tailored notifications, as well as our full-text analysis tool Clairk.

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Contact
Written by Tommaso Giardini and Nils Deeg
Please send questions and suggestions to nils.deeg@sgept.org

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