

Does your render need an AI
label?

BUSINESS OF ARCHVIZ

Does your render need an AI label?

The EU's labelling rule for archviz renders and films, in two speeds.

Anees Alomar

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IMPRINT AND LEGAL NOTICE

Does Your Render Need an AI Label?

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Business of Archviz · Anees Alomar

Mathystraße 11, 76133 Karlsruhe, Germany

info@aneesalomar.com · businessofarchviz.com

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The law itself: Regulation (EU) 2024/1689 (the AI Act), Article 50 · official text: eur-lex.europa.eu/eli/reg/2024/1689/oj · readable version:

artificialintelligenceact.eu/article/50

All sources: page at the back of this book.

The example images in this book are AI-generated illustrations (Higgsfield), disclosed here and beside each image. They show no real project and no real place.

Concept and design: Business of Archviz · Set in Flecha S and Inter.

BEFORE YOU BEGIN

This book reads at two speeds.

The large type tells the whole story. Five minutes, cover to cover.
That is enough to know where you stand.

The small type holds the depth: the paragraph references, the edge cases, the exact wording. Read it when a page concerns your studio, or never. The story stands without it.

Every claim in this book cites its source: "¶" numbers point to the EU Commission Guidelines of 20 July 2026, "Code" to the EU Code of Practice of 10 June 2026. The full links are at the back. Check me.



Since 2 August 2026, some renders need a label.

2 AUG 2026



before: nothing changes

after: the rule applies

Article 50 of the EU AI Act. One rule, identical in all 27 EU states. It applies to what you publish from this date on. Nothing made and published before needs a label after the fact (¶154).



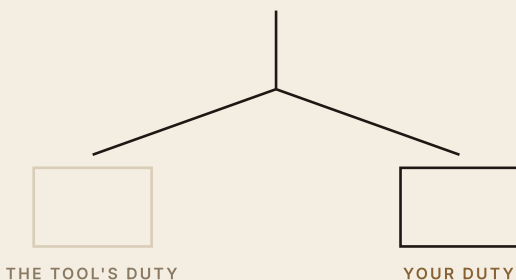
Not all renders. Not even most.



Most studio work needs no label at all. The point of this book is to show you exactly which images do, so the rest of your work stays untouched, and documented as such.



One law. Two duties.



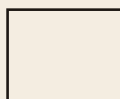
Duty one, Art. 50(2): the tool provider marks its outputs invisibly, in the file. Duty two, Art. 50(4): whoever deploys the AI adds a visible label, when the result is a deep fake. Keep them apart and most of the confusion disappears.



The tool marks its output. That one is not yours.



THE TOOL

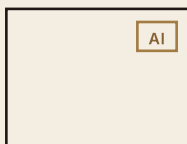


MARKED IN THE FILE

Midjourney, Runway, Adobe, Topaz: they must mark what they generate, machine-readably. Metadata, invisible watermarks. You do not add this, and it does not show in the image. **One exception that can bite:** fine-tune a model and run it under your own name, and you become a provider yourself; the marking duty becomes yours too (¶15).



You label the deep fakes. That one is yours.



VISIBLE. IN THE IMAGE.

The deployer, whoever decides to use the AI system and how, must visibly disclose AI-generated or AI-manipulated content, when it counts as a deep fake (Art. 50(4), ¶12). In archviz that deployer is usually the studio. So the whole question becomes one question: when does a render count as a deep fake?



A deep fake is what a viewer would take as real, and isn't.

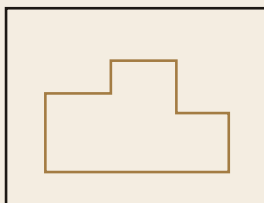


TAKEN AS TRUE

The legal definition, Art. 3(60): "AI-generated or manipulated image, audio or video content that resembles existing persons, objects, places, entities or events and would falsely appear to a person to be authentic or truthful." Intent does not matter; the test is objective (¶114). And the audience matters: what a public hearing takes as true is judged by the public, not by architects (¶115).



A building counts. A place counts.



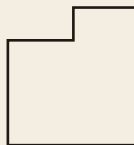
The Guidelines spell it out: "objects" includes buildings, "places" means realistic locations (¶113). A photorealistic AI image of a building on a site is exactly the kind of content the definition covers. This rule was not written about politicians only. It was written about your work too.



"But it isn't built yet." Doesn't matter.



PLANNED



PLAUSIBLE = COVERED

The definition says "existing", and every archviz brain jumps to the same escape: our project doesn't exist yet. The Guidelines close that door: it is enough that the subject "can plausibly exist" (§113 ii). Only the physically impossible is out; the Commission's own example is a sphinx flying over the Eiffel Tower. Your work is plausible by profession.

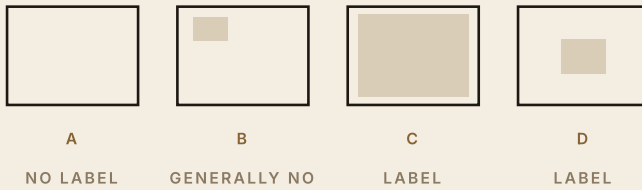
The question is never "did we
use AI".

It is "what does the viewer take
as true".



Four cases cover your whole studio.

A: pure render, no AI. B: real model plus AI cosmetics. C: fully AI-generated. D: AI changed the building itself. Everything your studio ships is one of these four. One spread per case, with two examples each; the grey square marks what the AI touched.



The map. The line is never "AI or no AI": it is whether AI generated or changed the thing the viewer takes as the project.



PART 2 · CASE A · PURE RENDER

Pure render: no label.

■ OUTSIDE THE RULE ENTIRELY



A PAVILION ACROSS THE LAKE · RENDERED FROM THE MODEL, NO AI
EXAMPLE IMAGE: AI-GENERATED

A frame rendered from your CAD or BIM model, no generative AI anywhere, is not an AI output at all: "a rendered frame ... falls outside the scope" (¶64). However atmospheric the light, however painterly the mist: if it is computed from the model, it is outside the rule.



A HOUSING QUARTER AT DUSK · RENDERED FROM THE MODEL, NO AI
EXAMPLE IMAGE: AI-GENERATED

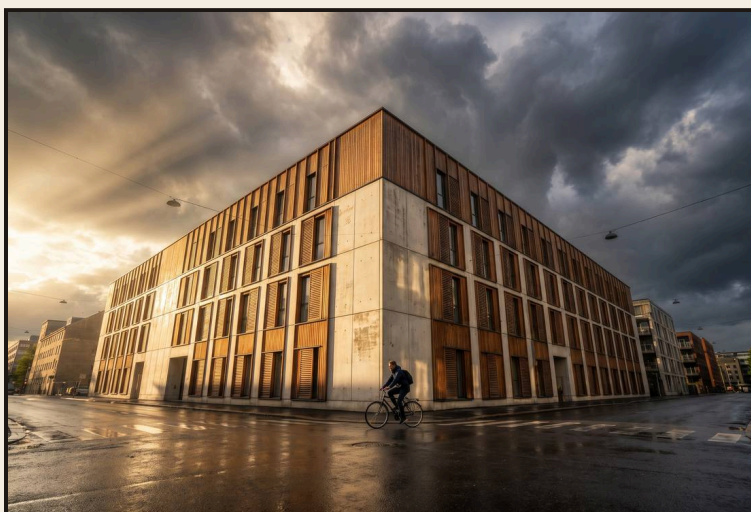
Point clouds and meshes are out too (¶61). One boundary: AI-generated 3D and VR content is inside the rule and treated as video (¶61 to ¶62). **Do this anyway:** write "no generative AI" in the delivery record. The absence is worth documenting, because it is the strongest claim you own.



PART 2 · CASE B · REAL MODEL, AI COSMETICS

Real model, AI cosmetics: generally no label.

■ GENERALLY NO · ASSESS EACH CASE



AI STORM SKY OVER THE REAL BUILDING · BUILDING AS MODELLED
EXAMPLE IMAGE: AI-GENERATED

AI sky, vegetation, colour, mood, background atmosphere: minor edits. Background replacement "for clearly aesthetic purposes" has "only a minor impact" on authenticity (¶116); the Guidelines' own example list covers a real product "against an AI-generated background and surrounding environment".



AI FOG AND WINTER MOOD · BUILDING AS MODELLED EXAMPLE
IMAGE: AI-GENERATED

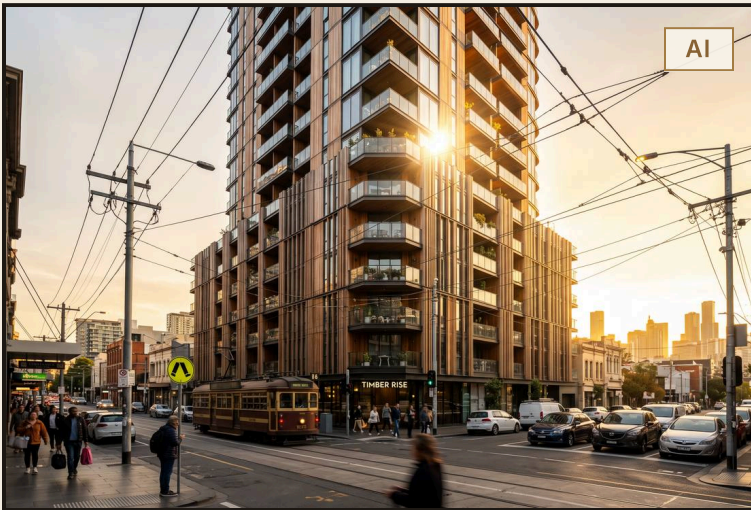
Two conditions. The project comes from the real planning data, and the layers stay truly cosmetic. Background people who decorate are here; people who carry the message are the grey zone two spreads on. And a generative upscaler that invents façade detail is not cosmetic any more (¶91). Assess each image; write it down.



PART 2 · CASE C · FULLY AI-GENERATED

Fully AI-generated: label it.

■ LIKELY YES · STANDARD FORM



LOOKS LIKE A PHOTOGRAPH. IT IS A PROMPT. EXAMPLE IMAGE: AI-GENERATED

Text-to-image, image-to-video, a whole photoreal scene with no planning model behind it. Buildings count (¶113), plausible counts as existing (¶113 ii), and photorealism makes deception likely (¶114). The more it looks like an award-winning photo, the more it needs the two letters.



A BUILDING THAT EXISTS NOWHERE, ON A COAST THAT EXISTS
NOWHERE EXAMPLE IMAGE: AI-GENERATED

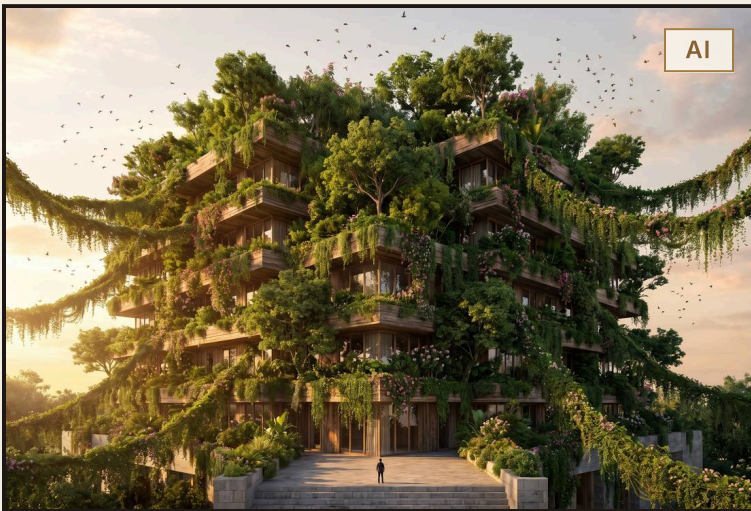
And "it's creative work" will not save a marketing film: informative or commercial content gets the standard label, and when content is both, "the informative character should always prevail" (¶122). Label it, top corner, from the first second.



PART 2 · CASE D · AI CHANGED THE BUILDING

AI changed the building: label it.

■ LIKELY YES · OR FIX THE MODEL



A VERTICAL FOREST NO STRUCTURE COULD CARRY EXAMPLE IMAGE:
AI-GENERATED

AI swaps the façade, invents an entrance, grows a forest the plans cannot hold. This is the Guidelines' own advertising example: making the product appear "more appealing ... than in real life" (¶116). Your product is the building.



A CROWN AND A CANTILEVER THE PLANS HAVE NEVER SEEN
EXAMPLE IMAGE: AI-GENERATED

The image promises what the drawings do not contain, model or no model underneath. **The honest alternative:** if the design decision is real, change the model, then render. Case D becomes Case A or B, and the label question disappears with the invention.



PART 2 · THE GREY ZONE

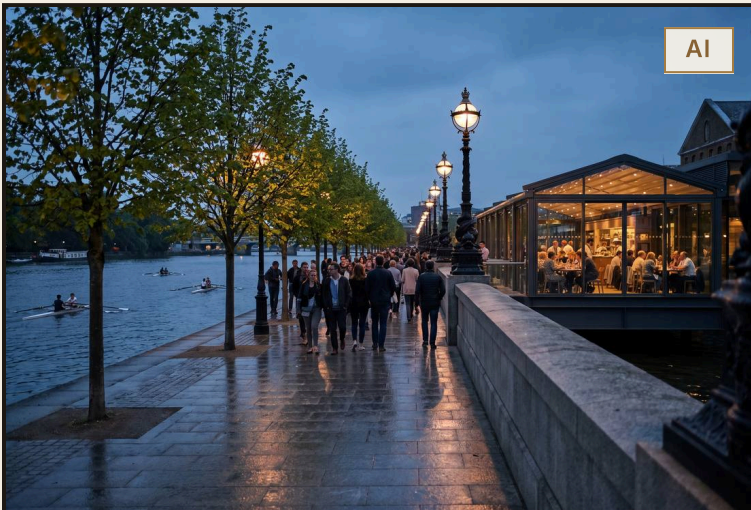
The grey zone: AI people who make the argument.

■ CASE BY CASE · WHEN IN DOUBT, LABEL



THE FESTIVAL IS THE PROMISE. THE CROWD IS AI. EXAMPLE IMAGE:
AI-GENERATED

Background people are cosmetics. But when the people are the point, the square is alive, the café works, the promenade draws the whole town, the AI is generating the "essential elements that impact audience perception" (¶114).



THE PROMENADE EVERYONE ALREADY LOVES. NOBODY HAS WALKED IT. EXAMPLE IMAGE: AI-GENERATED

A council deciding on a public space partly decides on that crowd. No safe harbour; you assess each case. **The test:** if removing the AI people removes the argument, label. A corner icon costs nothing; a misleading hearing exhibit costs credibility.



When in doubt, label. It costs two letters.

AI

There are no court decisions yet, so doubt will happen. Treat the label as the cheap option, because it is. A corner icon does not say "fake"; in 2026 it reads as professionalism. An unlabelled image someone later challenges costs more in one meeting than a hundred labels.



Before anything leaves the studio: five questions.

- 1 Did a generative AI tool generate or change anything in this image or film?

- 2 Is the AI part cosmetic only, and the building and site exactly as in the planning model?

- 3 Did AI generate or change the building, the site, or the people who tell the viewer how the place is used?

- 4 Would the audience take it as a true picture of the project?

- 5 Who publishes it, and does the label survive cropping, reposting, printing?

Two minutes per deliverable, at export. The next five pages take them one at a time.



One: did AI touch it at all?

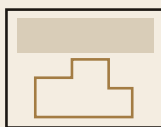


ANY GREY ANYWHERE?

No: done. Outside the rule (¶64). Write "no generative AI" in the record and deliver. **Yes:** next question. Check the actual pipeline, not your memory of it: the plugin someone used at midnight counts. Rendering engines computing light are not generative AI; Generative Fill, AI skies, image-to-video are.



Two: cosmetic only, and the model true?

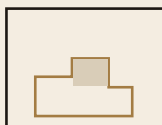


HOLD IT AGAINST THE PLANS

Yes to both: generally no label (¶116). Log the layers and deliver. **No, or unsure:** next question. "Cosmetic" means sky, vegetation, colour, mood, plain upscaling, decorative people. "Model true" means someone could hold the image against the plans and find no invented geometry or materials. An upscaler that invents new building detail already fails this question (¶91).



Three: did AI change what the image argues?

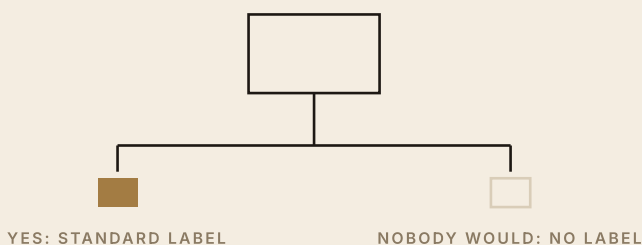


THE ESSENTIAL ELEMENTS

The building, the site, the people who carry the message of use or scale: the "essential elements that impact audience perception" (¶114). **No:** the AI stayed decorative after all; log and deliver. **Yes:** you are in labelling territory. The next question decides the form.



Four: would they take it as true?



Photoreal, used where people decide (marketing, sales, a hearing, the press): they take it as true; standard visible label. **An obvious sketch or stylised study** that nobody takes as a truthful depiction fails the deep-fake test itself; no label at all (¶114). **Between them** sits the evidently artistic work that could still mislead: a real deep fake with a lighter disclosure, icon next to the frame or in the credits (¶120 to ¶123, Code Commitment 3). Be honest about "evidently": a photoreal image on a project website is not evidently anything except the project.



Five: does the label survive publishing?



STUDIO · CLIENT · THE CROP

The label must be visible at the audience's first exposure (Art. 50(5)), not in your export folder. Export with the icon in place, in every format. Tell the client in writing what is labelled and why. Agree who keeps the label on when the film is cropped, reposted or printed (¶12). Deliver a labelled 9:16 and 1:1 yourself; do not leave the crop to an intern.



Whoever decides to use the AI carries the duty.



The law's word is deployer: whoever takes "responsibility over the decision to deploy the system and over the manner of the actual use" (¶12). Not the freelancer who pressed the button (¶14). Not the platform that displays the film (¶16). Whoever decides.



In a normal commission, that's the studio.



The Commission's own example: a company "that merely commissions an advertising agency ... without taking decisions and exercising control over whether and how the advertising agency uses AI ... is not a deployer" (¶14). Swap agency for studio and you have the normal case. That is not bad news: the assessment happens where the knowledge is. You know what is AI-touched. Your client usually does not.



Unless the client takes the wheel.



THE CLIENT RUNS THE AI

The test is control over "whether and how" AI is used (¶14). A client that runs AI on your deliverables in-house, upscales, edits, cuts AI social versions, or takes over the production decisions, carries the disclosure duty for what it changed. Merely writing "please use Midjourney" in a brief does not settle it; control does. Most clients have no idea this line exists. Tell them before the project, not after a complaint.



Put it in the contract. One clause is enough.



What the clause says, in plain words: the studio documents the AI layers per deliverable and confirms whether the building is shown as in the model. Where a label is needed, the studio applies it before delivery and says so in the delivery note. The client preserves the label in every use and tells the studio before any use that would remove or cover it. Where the client takes control of the AI use or manipulates the files itself, the corresponding duties move to the client. Deployers in longer chains are expected to secure the label downstream "via contractual conditions" (¶12). Sample legal wording on request; have a lawyer draft yours.



The label is two letters.

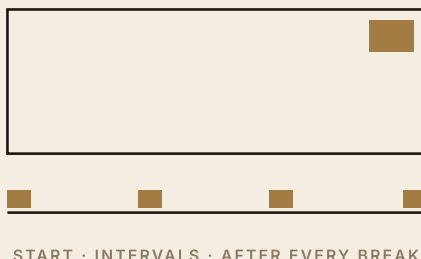


AI

The capitalised acronym "AI", in English, is the main element (Code, Measure 1.1a). The EU publishes an official icon, free for anyone to use. Size, colour and style are yours, as long as it stays readable against the background. No legalese, no disclaimer burned into the frame. Following the Code's format is the cheapest defensible route: whoever labels differently must show, by other means, that their way meets the law (¶148).



In the corner. From the first second.



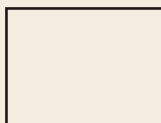
Clear and distinguishable at the latest at first exposure (Art. 50(5)).

Placed where nothing overlays it; top-right is the Code's own example, not a command (1.2.2a). For video: at the beginning, at regular intervals, at minimum after interruptions (1.2.2b). Screenshots and clips travel; the repetition makes the label travel with them.

Simplest habit: keep the icon on for the whole AI-generated segment.



Hidden doesn't count.

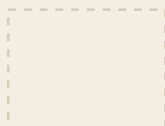


PAGE 14 OF THE TERMS

Information that "can be easily overlooked or missed" under normal viewing is not a label (¶142): a note in the terms of use, a mention buried in menus, a watermark you need to hunt for, a caption that disappears when the image is shared. And metadata alone is not a label either: deployers "cannot rely on the machine-readable marking" embedded by the tool (¶117). The test: would a normal viewer, watching normally, notice it?



"It's art" won't save a marketing film.



EVIDENTLY A SKETCH



SOLD AS THE PROJECT

A lighter disclosure exists for deep fakes inside evidently artistic works: icon next to the frame, in the credits, in the description (Code, Commitment 3). The Guidelines read "evidently" strictly: exclusively informative or commercial content is excluded, and mixed content follows its informative character (¶122). A project film informs buyers about a real project. Assume the standard form. The cleaner exit is different: an obvious sketch nobody takes as true is no deep fake at all, and needs nothing (¶114).



Say what the AI did. That's not a confession. That's provenance.

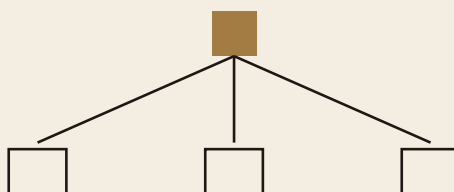


"AI: SKY AND VEGETATION.
BUILDING AS IN THE PLANNING MODEL."

The Code encourages a second layer: "generated" or "modified", and what was changed (Measure 1.1b). For most industries a burden. For you, the one claim competitors can't fake: the project is real where it matters, and honest about the rest. Verifiable against the plans. A label written like this doesn't weaken the image. It certifies it.



One rule. Twenty-seven states.



ONE RULE · 27 STATES

The AI Act is a Regulation, not a Directive. It applies directly in every member state, which means there is no national version of Article 50 to look up: the text you have to satisfy is the one on the previous pages, and it is the same text in every one of the twenty-seven. What each member state does appoint is its own supervisory authority (Art. 70) — the office that would take a complaint. That is the one thing worth knowing locally. And the duty does not follow your address: content made for an EU audience is in scope wherever the studio sits (¶113).



Old work stays old. And the "delay" you heard about is not yours.



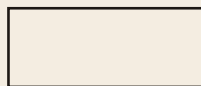
Published before 2 August 2026: no retroactive labelling; you are encouraged to add it where easy, not expected to audit archives or reprint brochures (¶154). The "AI Omnibus" transition to 2 December 2026 covers only the tool providers' machine-readable marking for systems already on the market (¶153). Your visible label, Duty two, applies since 2 August 2026. Anyone telling you "it's postponed" has mixed up the two duties.



And never claim "AI-free".



"AI-FREE"



FROM THE REAL PLANS

One AI sky in one delivery makes "AI-free" false, and the falseness is checkable: the tool's invisible marks sit in your files, and platforms are learning to read them. Say the claim that survives an audit instead: **built from the real planning data, verifiable against the plans, AI used only where stated.** Provenance, not abstinence.



Four habits make this a non-issue.

- 1 **Log the layers.** One row per deliverable: tool, what it touched, model true or not, label decision, who applies it.

- 2 **State the provenance.** One line on every delivery note: model version, what AI did, verifiable against the plans.

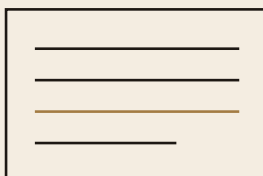
- 3 **Keep the marks.** Don't strip metadata at export; switch on Content Credentials where your tools support them.

- 4 **Label in the preset.** One overlay preset per format: still, 16:9, 9:16. A checkbox at export, not a decision at 11 pm.

A spreadsheet, a sentence, a setting, a preset. No lawyer required.
The five questions fill the log; the log answers every client question
before it is asked.



The provenance line does the selling.



The template: "This visualisation was produced from the planning model [name, version, date] supplied by [client]. The building, site and dimensions are shown as in the model and can be verified against the plans. Generative AI was used for: [sky, vegetation / none]. Prepared by [studio], [date]." Copy it. Fill the blanks. It answers the law, and it positions you in the same breath.

Document what the AI did.
Label what a viewer would
believe.

That is the whole rule, and the whole workflow. Everything else in this
book is detail.

Three questions for your visualisation partner.

1. Which elements of our images and films are AI-generated or AI-manipulated? You want a list per deliverable.

2. Is the building and the site shown as in the planning model, or generated? Model-true renders with cosmetic AI generally need no label. AI that invents or changes the building generally does.

3. Who labels, and how does the label survive publishing, cropping, printing? Agree it in writing.

A good answer looks like: a one-line provenance statement on every delivery, a label on anything the studio judged as needing one, and a clause in the contract about who preserves it. Since 2 August 2026 this is EU law (Regulation (EU) 2024/1689, Article 50); the duty usually sits with the studio, but the film carries your project's name.

SOURCES · CHECK EVERY CLAIM

The law: Regulation (EU) 2024/1689, Art. 50, Art. 3(60), Art. 99 · eur-lex.europa.eu/eli/reg/2024/1689/oj · readable: artificialintelligenceact.eu/article/50

The ¶ numbers: European Commission, Guidelines on the transparency obligations under Article 50, C(2026) 5054, 20 July 2026 · digital-strategy.ec.europa.eu

The label format: Code of Practice on the transparency of AI-generated content, 10 June 2026 · [PDF via ec.europa.eu](https://pdf.ec.europa.eu)

The official icon, free to use: digital-strategy.ec.europa.eu · [EU icons](#)

Penalties for the record, stated once: up to €15 million or 3% of worldwide annual turnover, whichever is higher; for SMEs, whichever is lower (Art. 99(4)(g), Art. 99(6)). These are maximums, not tariffs. No archviz case exists anywhere.

ONCE MORE, IN PLAIN WORDS

This book is information, not legal advice.

The Commission's Guidelines are non-binding. The Code of Practice is voluntary. No court or authority has ruled on an archviz case under this law, and nothing in this book predicts how your content would be assessed.

For a specific question: your national supervisory authority, or a lawyer. For everything else: the sources on the previous page, one click deep.

ABOUT

Anees Alomar, founder of Business of Archviz. Architect, licensed in Germany and Syria. Coaches architectural visualization studios on positioning, pricing, sales and systems.

This book was researched from the primary legal texts in full: the AI Act, the Commission's Guidelines and the Code of Practice, with every claim cross-checked against the sources cited at the back.

Business of Archviz · Karlsruhe

info@aneesalomar.com · businessofarchviz.com

ONE MORE THING

Labelling is the easy half.

Knowing what to disclose does not tell you what to sell, who to sell it to, or why the last three enquiries went quiet. That is a different conversation, and it starts with your own numbers rather than the law.

Thirty minutes on your actual figures. €107, credited if you continue. You leave with a thirty day action plan and a written ninety day roadmap.

businessofarchviz.com/health-check-call



Document what the AI did.
Label what a viewer would believe.

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