SPRINKLING ACT · GLOSSARY

Human in the Map, Conformity Assessment & Certification

Three distinct things, routinely confused

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The EU AI Act introduces a layered regulatory framework where different actors perform different roles. Confusion between these roles creates legal risk. This glossary defines the three critical distinctions that every AI system deployer and provider must understand.

WHAT SPRINKLING ACT PRODUCES

1. Human in the Map

> **Human in the Map is an independent examination of one workflow that already runs on AI. It renders what actually happens in that chain, dated, along with what each finding rests on.**

- Covers **one workflow**, the one the executive names, from human input to used output.
- Built from the elements you provide, exports, version history, dated files, the procedure as written, and from interviews reconstructed episode by episode.
- **Nothing is installed**, no agent runs in your environment, nothing remains afterwards.
- Each finding carries a proof status. An uncorroborated statement is marked as such, and a gap is established only after a second source of a different kind.
- Every family of findings carries an expiry date, because a chain that keeps running stops matching its description.
- Does **not** constitute legal advice, a compliance audit, or regulatory certification. We measure, we do not resolve.

THE FORMAL ART. 43 EU AI ACT PROCESS

2. Conformity Assessment

A Conformity Assessment is the formal procedure defined in Article 43 of the EU AI Act through which a high-risk AI system is evaluated against the requirements set out in Chapter III, Section 2 (Articles 8–15).

- Required for **high-risk AI systems** as classified under Article 6 and listed in Annex III.
- Can be performed via **internal conformity assessment** (based on Annex VI) or via **third-party conformity assessment** involving a Notified Body (based on Annex VII).
- Third-party assessment is **mandatory** for high-risk AI systems covered by Article 6(1), those falling under Union harmonisation legislation listed in Annex I, Section A.
- For Annex III systems, providers may generally use **internal assessment**, except for biometric identification systems (Annex III, point 1), which require Notified Body involvement.
- Must be completed **before** the AI system is placed on the market or put into service.
- Results in a **Declaration of Conformity** (Art. 47) and CE marking (Art. 48).

WHAT ONLY NOTIFIED BODIES CAN DELIVER

3. Certification

Certification is the formal attestation issued by a Notified Body, an independent organisation designated by a Member State under Article 28, confirming that a high-risk AI system meets the requirements of the AI Act.

- Only **Notified Bodies** designated under Article 28 and meeting the requirements of Article 31 can issue certifications.
- Notified Bodies must be accredited by national accreditation bodies and formally notified to the European Commission.
- Certification involves a **quality management system assessment** and a **technical documentation assessment** of the AI system (Annex VII).
- Certificates are valid for a **maximum of 5 years** and can be renewed (Art. 44).
- Certification can be **suspended or withdrawn** if the system no longer meets the requirements (Art. 44(4)).
- No private company, consultancy, or assessment tool can issue a conformity certificate: this is exclusively a Notified Body function.

Comparison at a Glance

	Human in the Map	Conformity Assessment	Certification
Who performs it	Independent measurement (e.g. Sprinkling Act)	Provider (internal) or Notified Body (third-party)	Notified Body only
Legal basis	None · voluntary	Art. 43 EU AI Act	Art. 44, Annex VII EU AI Act
Output	A dated report on one workflow, with a proof status per finding	Declaration of Conformity + CE marking	Conformity certificate
Legal effect	Informational · not binding	Mandatory for market access (high-risk)	Formal attestation of compliance
Scope	One workflow that already runs on AI	High-risk AI systems only (Art. 6 + Annex III)	High-risk systems requiring third-party assessment
Timing	While the material is still recent	Before placing on market / putting into service	As part of third-party conformity assessment

Important Disclaimer

Sprinkling Act produces **dated reports on a single workflow**, not certifications. Our reports describe what happens in a chain where a machine has taken part of the work, with the evidence each finding rests on. They do not constitute conformity assessments under Article 43, they do not replace the involvement of Notified Bodies where required, and they do not constitute legal advice. Organisations deploying high-risk AI systems must follow the formal conformity assessment procedures defined in the AI Act.

AI Act References

- **Article 6** · Classification rules for high-risk AI systems
- **Article 43** · Conformity assessment for high-risk AI systems
- **Article 44** · Certificates issued by Notified Bodies
- **Article 47** · EU Declaration of Conformity
- **Article 48** · CE marking
- **Annex I** · Union harmonisation legislation (Section A)
- **Annex III** · High-risk AI systems (areas of use)
- **Annex VI** · Internal conformity assessment procedure
- **Annex VII** · Conformity assessment based on assessment of quality management system and technical documentation

Six questions, two minutes, no account: what supports what you know about your deployment.