CREATOR RISK INTELLIGENCE

The Signal

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An AI influencer attended Wimbledon in July 2025. She had 160,000 followers. A professional cricketer posed for a photo with her. A Pimm's branded post went live. Her AI origin was buried behind a Read More button in her bio. This is what the EU AI Act was written for.

IN THIS ISSUE

01 — MIA ZELU: THE AI INFLUENCER AT WIMBLEDON

AI creator · Wimbledon · EU AI Act · July 2025

On 7 July 2025, social media accounts for Mia Zelu — a 'digital creator' with over 160,000 followers across Instagram and TikTok — began posting from Wimbledon. The posts showed Zelu courtside, at hospitality events, and in a photograph with England cricketer Jos Buttler, who later confirmed he had not known he was posing with an AI-generated persona. A post featuring Pimm's branding appeared on her feed the same day.

Zelu is entirely AI-generated. Her appearance, personality, backstory, and content are produced by a creative agency. Her Instagram bio disclosed this — but the disclosure was placed after a truncated bio that required users to tap 'More' to read it. The majority of her audience, and the majority of the brands and individuals who interacted with her at Wimbledon, did not know.

Why this case matters

The Mia Zelu case is the most prominent real-world test of the EU AI Act's content labelling requirements since they began phasing in. The Act requires that AI-generated content used in commercial contexts be clearly and conspicuously labelled as artificially created — not disclosed behind a Read More button. The standard is whether a reasonable audience member would understand the content's origin without having to seek that information out.

On that standard, Zelu's disclosure almost certainly fails. The fact that a professional sportsman with a public profile posed for what he believed was a photograph with a human creator — and only discovered otherwise afterwards — is the clearest demonstration yet of why the EU AI Act's threshold is set where it is.

The brand liability question

The Pimm's branded post on Zelu's account raises a direct brand liability question under the EU AI Act and existing UK ASA standards. If a brand commissions or permits its products to appear in AI-generated content without ensuring that content is properly labelled as AI-created, the brand shares responsibility for the non-disclosure. The question — which has not yet been answered by a regulatory action — is whether the brand knew Zelu was AI-generated when the content was agreed.

THE TRACE DIMENSION THIS CASE ADDS

The Mia Zelu case introduces a new element to creator vetting that the TRACE framework must accommodate: is this creator human? That is not a question that standard vetting processes are designed to ask. A synthetic influencer with a well-constructed persona, a real follower count, and a plausible posting history is indistinguishable from a human creator without specific checks. The vetting question is no longer just 'is this creator safe?' It is also 'is this creator real?'

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The EU AI Act's labelling requirement exists precisely because audiences cannot always tell AI-generated content from human content. Zelu's case proves the point. A professional with a public profile could not tell. A brand's compliance team conducting a standard creator review would not have caught it without specific AI detection checks.

RECOMMENDED ACTION

Add a synthetic creator check to your vetting process. AI detection tools are available and improving rapidly. The failure to identify an AI creator before activation is now a compliance risk, not just a reputational one.

02 — ITALY'S AGCOM CODE OF CONDUCT TAKES EFFECT

Italy · AGCOM · 500k+ followers · July 2025

Italy's AGCOM Code of Conduct for influencers came into force in July 2025. It applies to all creators with 500,000 or more followers on any single platform, or 1 million average monthly views across platforms. For creators meeting that threshold, the Code places their commercial content activities under the same regulatory framework as broadcast media.

The maximum fine under the audiovisual media services framework is €600,000 — the highest creator-specific regulatory fine in Europe. The Code requires transparent disclosure of all commercial relationships, prohibits content that harms minors, mandates fair and balanced presentation of health information, and requires registration with AGCOM's influencer register.

The practical implication for brands is direct: any creator operating above the threshold in Italy is now a regulated media entity. Brand partners share responsibility for ensuring that content produced under a commercial relationship meets the Code's standards. The brand is not insulated by the creator's obligation — it is alongside it.

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Italy now has the most comprehensive creator regulatory architecture in Europe. The combination of the Ferragni Law (charitable marketing transparency), the AGCM enforcement record, and the AGCOM Code of Conduct creates a three-layer framework that covers commercial content, charitable promotions, and broadcast standards simultaneously. Brands activating Italian creators above the AGCOM threshold are operating in a fully regulated environment.

RECOMMENDED ACTION

Check whether your Italian creator partners meet the AGCOM threshold — 500k followers or 1M monthly views. If they do, their commercial content obligations have materially changed. The AGCOM registration requirements and content obligations are publicly available. Map your Italian creator roster against them.

A note on this section

The regulatory environment for creator marketing has developed significantly since The Signal launched eighteen months ago. What began as occasional national developments has become a consistent, multi-market drumbeat. From this issue, we are adding a standing Regulatory Snapshot to every edition — because frankly, it now warrants one. Six markets, updated every month, with the developments that matter to brand-side teams.

03 — REGULATORY SNAPSHOT

Six markets · July 2025 · First standing edition

FRANCE	ARPP AI monitoring operational — 194,000 posts reviewed H1 2025, 222% increase year-on-year. Speech-to-text analysis active: verbal brand mentions in video now detectable as non-compliant. Maximum fine €300,000. Brand liability joint and several with creator.
GERMANY	UWG §5a(4) enforcement active. Private enforcement by competitor brands is the dominant mechanism. Hashtag-cloud disclosure ruled insufficient by multiple courts. Brands liable for creator disclosure failures even without direct supervision.
ITALY	AGCOM Code of Conduct in force July 2025 — applies to 500k+ followers or 1M monthly views. Maximum fine €600,000. Ferragni Law enacted — charitable marketing transparency requirements active. Criminal trial verdict expected Q3 2025.
UK	ASA Active Ad Monitoring operational — 50,000+ posts reviewed, 43% non-compliant. Named non-compliers list active. DMCCA in force — CMA 10% global turnover penalty ceiling. FCA finfluencer rules active.
EU-WIDE	EU AI Act transparency requirements active — AI-generated content must be labelled. DSA 24-hour removal obligation active. Digital Fairness Act legislative proposal expected Q3-Q4 2025. UCPD: influencers classified as traders across all 27 member states.
USA	FTC Consumer Reviews and Testimonials Rule active — fake social media indicators explicitly prohibited. Enforcement actions up 340% since 2021. Dual liability standard established — brands as primary respondents. FINRA and FCA financial services creator enforcement active.

Every market in this snapshot has active enforcement infrastructure. The era of treating influencer marketing compliance as a low-probability enforcement risk is over. The question is not whether non-compliant content will be found — it is whether your programme is compliant when it is.

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The Signal is published monthly by Signal Intelligence. Each issue covers real Creator Risk incidents, regulatory developments, and the intelligence that brand-side teams need before they need it. Subscribe at signalintelligence.consulting — and if this issue was forwarded to you, make sure you're on the list for the next one.