

Digital Omnibus on AI

CONTEXT

On 19 November 2025, the Commission published a proposal for a Digital Omnibus on AI: amendments to the Artificial Intelligence Act (in force since 1 August 2024) and to Regulation (EU) 2018/1139 on common rules for civil aviation (in force since 11 September 2018). These amendments seek to address implementation issues and reduce the regulatory burden arising from the AI Act. However, its timely application has faced delays, particularly regarding the designation of national competent authorities and the publication of harmonised standards and compliance tools for high-risk AI requirements. The minor amendments to Regulation (EU) 2018/1139 aim to ensure the consistent application of the AI Act's high-risk requirements in civil aviation.

The Digital Omnibus on AI is part of a broader digital package published on 19 November 2025, which includes two digital omnibus proposals (henceforth referred to as 'the digital omnibus': one amending personal and non-personal data and cybersecurity rules, and another – the Digital Omnibus on AI – amending AI rules), the European data union strategy and a proposed regulation on European business wallets. The digital package aims to simplify and enhance the effectiveness of the EU's digital laws, and help EU businesses to innovate, scale, and save on administrative costs. While the digital package has been welcomed by most stakeholders, the digital omnibus has raised concerns about achieving simplification while ensuring fundamental rights. It also entails a risk that simplification could upset the fragile equilibrium achieved during the initial trilogue negotiations.

In the Parliament, the file on the Digital Omnibus on AI was referred to the Committee on the Internal Market and Consumer Protection (IMCO) and the Committee on Civil Liberties, Justice and Home Affairs (LIBE). The Council adopted its negotiating mandate on 13 March 2026. The IMCO and LIBE committees adopted a joint report on the file on 18 March 2026. Once Parliament's mandate is approved in plenary (vote expected during the March II part-session), the EU co-legislators can launch trilogue negotiations.

LEGISLATIVE PROPOSAL

[2025/0359\(COD\)](#) – Proposal for a regulation amending Regulations (EU) 2024/1689 and (EU) 2018/1139 as regards the simplification of the implementation of harmonised rules on artificial intelligence (Digital Omnibus on AI) – [COM\(2025\) 836 final](#), 19.11.2025.

NEXT STEPS IN THE EUROPEAN PARLIAMENT

For the latest developments regarding this legislative procedure, see the [Legislative Train Schedule](#).

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Issue

In its February 2025 communication on [A simpler and faster Europe](#), the Commission set out its objective of strengthening the EU's competitiveness by reducing unnecessary regulatory burdens on people, businesses and administrations, while maintaining high standards for EU values. As highlighted in the [Draghi report](#), '[e]xcessive regulatory and administrative burden can hinder the competitiveness of EU companies compared to other blocs'. According to the report, regulatory accumulation affects sectoral productivity by increasing compliance costs and creating barriers to market entry. The report calls for simplifying the EU acquis and for giving special consideration to small and medium-sized enterprises (SMEs) and medium-sized companies (mid-caps).

Digital simplification has also been high on the agenda of several recent Council presidencies. In June 2025, the [Polish Presidency](#) of the Council identified simplification of digital regulation as a priority, in order 'to support innovation and reduce burdens on businesses, particularly SMEs'. The incumbent [Cyprus Presidency](#) has also placed regulatory simplification high on its agenda and aims to advance work on individual proposals falling under the digital omnibus.

Several scholars have expressed concern that the compliance obligations introduced by the AI Act could unintentionally hinder AI deployment and slow down innovation. For example, [Luca Holst et al](#) find that certain transparency requirements may affect innovation and call on the legislator to provide legal definitions related to transparency (such as the term 'transparency' itself). Similarly, [Yavuz Selim Balcioğlu et al](#) argue that the AI Act's potential to promote innovation while managing risks ultimately depends on its 'ability to evolve in response to technological progress and societal needs'.

By contrast, other scholars, such as [Karin Väyrynen et al](#), argue 'that the AI Act sets guardrails, not barriers, for AI initiatives and the deployment of AI innovations'. They suggest that the AI Act could foster the development of trustworthy and reliable AI systems, increase public trust and provide the necessary level of legal clarity that enables more confident innovation.

Following the entry into force of the AI Act, the Commission held a series of consultations and organised a [call for evidence](#) on the digital omnibus. These consultations highlighted critical bottlenecks, including delays in designating national competent authorities and conformity assessment bodies, and the absence of harmonised standards, guidance and compliance tools for high-risk AI requirements. These shortcomings have created a heavier compliance burden for businesses and public authorities than was initially anticipated.

To address these challenges, the Commission announced in its [2025 work programme](#) that it would present a set of omnibus proposals aimed at simplifying EU legislation, including a digital-focused subset of initiatives in the fourth quarter of 2025.

Main points of the proposal

The Commission published the [proposal](#) for a Digital Omnibus on AI on 19 November 2025. It constitutes a specific legislative instrument within a broader [digital package](#) that aims to simplify EU digital rules and boost innovation. This broader package includes several distinct initiatives, such as a digital omnibus (one proposal simplifying rules on data and cybersecurity, and another proposal on AI rules, the Digital Omnibus on AI); the European data union strategy; and a proposal for [European business wallets](#). The broader digital package is only the first step in the Commission's strategy to simplify and render EU digital laws more effective. The second step of the simplification agenda is a wider fitness check of the EU's digital rulebook, which will focus on the cumulative impact of existing legislation. The [consultation](#) on this wider fitness check was open until 11 March 2026.

The legal basis for the proposal is the same as that of the AI Act: Article 114 of the Treaty on the Functioning of the EU (TFEU), which allows the EU to adopt measures aimed at improving the functioning of the single market.

The main changes proposed are as follows:

- **Application timeline of high-risk AI rules:** the Commission proposes to amend the date of application of high-risk AI rules (initially 2 August 2026), by linking the date of application to the availability of harmonised standards or other tools supporting compliance with the AI Act. Once the Commission confirms the availability of such tools, high-risk rules would apply six months afterwards for Annex III systems (by 2 December 2027 at the latest) and 12 months afterwards for Annex I systems (by 2 August 2028 at the latest).
- **Centralised enforcement:** the EU's AI Office would supervise the compliance of AI systems integrated into very large online platforms or search engines,¹ as well as the compliance of AI systems based on general-purpose AI models where the system and model are provided by the same entity.
- **AI literacy:** the mandatory obligation for providers and deployers of AI systems to ensure AI literacy among their staff is replaced by a requirement for the Commission and Member States to promote AI literacy initiatives.
- **Single application for conformity assessment:** conformity assessment bodies that apply for a designation would be able to submit a single application and undergo a single assessment procedure.
- **Post-market monitoring:** the requirement for a harmonised template for the post-market monitoring plan is removed.
- **Extension of special regime applied to SMEs:** simplified documentation and special consideration in the application of penalties granted to SMEs are extended to small mid-caps (SMCs).
- **Special categories of personal data and bias correction:** providers and deployers of AI systems and models² may, on an exceptional basis, process special categories of personal data, subject to specific safeguards,³ to ensure bias detection and correction.
- **Obligation for registration:** providers would no longer have to register AI systems in the EU database if they conclude that these systems are not high-risk due to their narrow or procedural tasks.
- **AI regulatory sandboxes:** the scope of testing high-risk AI systems in real-world conditions is expanded. The AI Office is granted the legal basis for establishing an EU-level AI regulatory sandbox.
- **Generative AI marking:** providers of generative AI systems already on the market before 2 August 2026 are granted a transitional period of six months to comply with obligations to mark AI-generated content. The original deadline for these obligations was 2 August 2026.
- **Interplay between the AI Act and other EU legislation:** the interplay between the AI Act and other EU legislation, such as civil aviation rules and the General Data Protection Regulation, is clarified.

Parliament's prior position

Parliament has repeatedly recognised the need to make it easier for businesses to comply with EU laws. For example, in its [resolution](#) of 11 September 2025 on the implementation and streamlining of EU internal market rules to strengthen the single market, it requested that the Commission 'ensure that current and future legislation remains proportionate and does not add unnecessary burdens for businesses'. At the same time, Parliament urged the Commission to prepare impact assessments for all legislative proposals, emphasising that efforts to simplify legislation should not compromise the EU's core policy objectives. Any simplification measures must not weaken digital rights and consumer protection and must still ensure a stable and predictable regulatory environment for businesses.

Parliament has also called for inconsistencies between various EU laws to be addressed. In its [resolution](#) of 25 November 2025 on the impact of AI on the financial sector, for example, Parliament called on 'the Commission and the national competent authorities to identify and address any

inconsistencies in the course of the AI Act's implementation and as part of the upcoming Digital Omnibus package'.

Prior positions of other EU institutions

European Council

The European Council has, in several conclusions, called for further simplification and improvement of EU laws to ensure that the EU remains competitive. For example, in its [conclusions](#) of 23 October 2025, it called on the Commission 'to swiftly bring forward further ambitious simplification packages among others on the ... digital ...', and to avoid over-regulation.

Advisory committees

On 18 March 2026, the European Economic and Social Committee (EESC) adopted an [opinion](#) on the digital omnibus, which included the proposed amendments to the AI Act. The EESC broadly supports the Commission's Digital Omnibus proposal on AI. This support includes aligning the deadlines for applying high-risk AI obligations with the availability of harmonised standards and extending simplified documentation, reporting and procedures to mid-cap companies. However, the EESC believes that a provider's classification of an AI system as non-high-risk should not remain solely internal. It therefore calls for the establishment of a procedure that requires providers to register or notify national authorities of these classifications where necessary.

Preparation of the proposal

The Commission did not carry out a separate impact assessment of the proposal, [arguing](#) that the 'amendments put forward in the proposal are technical in nature'. However, not all stakeholders agree with this argument (see the next section). According to the better regulation [toolbox](#), an impact assessment is required for proposals that are expected to have a major impact or spending, and whenever 'the Commission has a choice between alternative policy options'. The [interinstitutional agreement on better law-making](#) adds that the initiatives included in the Commission work programme or in the joint declaration should, 'as a general rule, be accompanied by an impact assessment'.

In a [staff working document](#) accompanying the two proposals forming part of the digital omnibus, the Commission explained that several compliance costs estimated in the initial impact assessment of the AI Act could, in fact, be higher. In the impact assessment accompanying the proposal for the AI Act, the Commission estimated that the maximum compliance costs and administrative burden for companies would be €10 000.

The Commission held several stakeholder consultations in relation to this proposal (see the next paragraph), although these were quite brief. Some of these consultations focused specifically on collecting feedback from SMEs and mid-caps.

From 16 September to 14 October 2025, the Commission held a [call for evidence](#) on the digital omnibus (which forms part of the broader digital package). The call indicated the fourth quarter of 2025 as the publication date for the Commission's proposals. This was a continuation of previous calls for evidence relating to the [data union strategy](#), the [apply AI strategy](#) and the [review of the Cybersecurity Act](#). The call for evidence on the digital simplification package mentioned an omnibus focusing on ensuring the smooth application of the AI Act, taking into consideration the needs of small mid-caps and facilitating its smooth interplay with other EU laws.

Most stakeholders who replied to the call for evidence strongly supported the simplification efforts. Several business representatives called for revising the timeline of high-risk rules under the AI Act, while NGO representatives and citizens contested the need for this revision. SMEs called for more support tools, guidance and simplified compliance rather than legal changes. Several stakeholders also asked for clarification on the interplay between the AI Act and other EU laws, such as the

General Data Protection Regulation and the Digital Services Act, and for data usage to be simplified for AI training purposes.

According to Commission estimates, the proposed amendments to the AI Act could save up to €429.5 million in administrative costs per year. The largest cost savings would result from transforming the obligation of AI literacy under the AI Act, which would enable businesses to save €222.75 million. Changing the timeline for high-risk rules would enable businesses to save between €68 million and €204 million, while extending the special regime applied to SMEs to small mid-caps would save these businesses €2.5 million.

Points of view⁴

Stakeholder and academic views on the Digital Omnibus on AI diverge sharply.

Industry groups generally welcome the Digital Omnibus of AI as a necessary step forward in boosting competitiveness and supporting innovation. [Connect Europe and GSMA](#), representing the European telecommunications sector, view the proposal as 'a positive first step towards ensuring the effective implementation of the AI Act' and are calling for its swift adoption. They support the proposed changes to AI literacy and the non-registration of AI systems having narrow or procedural tasks. However, they are calling for a delay in the implementation of high-risk rules even further, namely one year after the harmonised standards are in place.⁵

While the [European Digital SME Alliance](#) views the Digital Omnibus on AI as 'a step forward', it reminds the co-legislators that 'simplification alone will not reduce Europe's dependence on foreign technologies'. Therefore, it is calling for further action, such as the introduction of European preference in public procurement.

[SME United](#) has highlighted that, before high-risk rules are applied, SMEs must be able to rely on the availability of harmonised standards and practical guidance from the Commission. Therefore, SME United deems it necessary to link application dates to the availability of harmonised standards and official guidance.

The Computer & Communications Industry Association (CCIA Europe)⁶ [considers](#) the delay in the implementation of high-risk rules to be necessary. CCIA Europe proposes fixed deadlines of 2 December 2027 and 2 August 2028, rather than deadlines that depend on the availability of standards. CCIA Europe also proposes extending the six-month transitional period for complying with obligations to mark AI-generated content by a further six months. The association welcomes the provisions allowing the exceptional processing of special categories of personal data to ensure bias detection and correction.

Several business organisations sent a [joint industry statement](#) to the Council and Parliament on 12 March 2026, warning against overlapping and potentially conflicting obligations under the AI Act and EU sectoral law. They believe that, for sectors already regulated by EU product safety laws, AI-related requirements should be addressed through sectoral laws.

Shortly before the proposal was published, civil society organisations, trade unions and public interest advocates warned in a [public letter](#) against rolling back digital fundamental rights. They called for the immediate halting of 'any attempts to reopen the GDPR, ePrivacy framework, AI Act or other core digital rights protections'. In February 2026, they sent another [letter](#) calling for the reinstatement of registration requirements in the Digital Omnibus on AI for systems that providers have determined are not high-risk.

The European consumer organisation [BEUC](#) argues that the digital omnibus proposals go far beyond 'targeted modification'. BEUC is concerned about the delay in implementation, the reversal of AI literacy obligations, the removal of registration requirements, the extension of the special regime for small mid-caps and the allowance to process special categories of personal data for bias detection and correction for all AI systems.

The European Data Protection Board (EDPB) and the European Data Protection Supervisor (EDPS) issued a [joint opinion](#) in which they expressed support for the general objective of the Commission's proposal to address some of the implementation challenges facing the AI Act. However, the joint opinion calls for strict limits when allowing the use of special categories of personal data for bias detection and correction and opposes deleting registration requirements and changes to AI literacy. It supports the creation of EU-level AI regulatory sandboxes and calls for the involvement of data protection authorities in these sandboxes.

The [Standing Committee of European Doctors](#) (CMPE) has called for the reinstatement of strict necessity as the standard for processing special categories of personal data for bias correction. The CPME also advocates for restoring registration requirements and maintaining the obligation for providers and deployers to ensure a sufficient level of AI literacy among their staff and persons operating with AI. Additionally, the CPME has cautioned that revisions of certain EU sectoral laws, such as the Medical Devices Regulation, may render the AI Act's safeguards on high-risk AI systems inapplicable.

The research and campaign group [Corporate Europe Observatory](#), in collaboration with LobbyControl, has described the omnibus as 'an unprecedented attack on digital rights'. They regret that the proposal removes the registration requirement if a provider concludes that the AI system is not high-risk. They also regret the delay in the implementation of high-risk rules, as well as the extension of the possibility to process personal data for bias detection and correction to all AI systems.

Joshua Franco, a Senior Research Advisor at [Amnesty Tech](#), warns that the proposed changes provide people with even less protection against harmful AI systems by further weakening 'the already weak transparency requirements for high risk systems'.

In an [article](#) published in The Week, the weekly EU law roundup of EU Law Live, an EU law news and analysis platform, researcher Kamrul Faisal argues that while the Digital Omnibus on AI promises simplification and efficiency, it 'risks weakening the very safeguards that EU law has worked so hard to establish'. He also criticises the adjustment of deadlines for high-risk systems, as well as the removal of registration requirements for certain AI systems and the broadening of the EU AI Office's supervisory powers.

[Michele Molè](#) from the University of Groningen also criticises the weakening of AI literacy obligations, the normalisation of sensitive data processing for bias detection and correction, and the changes to registration requirements.

While several think tanks have welcomed some of the proposed changes, such as the strengthening of regulatory sandboxes, they have also highlighted the need for further action to ensure that the EU remains competitive in this field. Daniel Schnurr, from the Centre on Regulation in Europe ([CERRE](#)), considers the extension of the timeline for high-risk rules to be reasonable. He welcomes the strengthening of regulatory sandboxes and real-world testing, but questions whether the Commission has 'an overarching digital strategy'. Bertin Martens from [Bruegel](#) criticises the process of developing guidelines to help interpret various articles of the AI Act, arguing that it takes too much time and favours established industry players.

Next steps in the legislative process

There is significant time-related pressure for the EU co-legislators to agree on this file, given that the Digital Omnibus on AI seeks to amend the date of application of certain obligations under the AI Act, such as the date of application of high-risk AI rules (2 August 2026).

On 13 March 2026, the Council agreed its [general approach](#), largely maintaining the Commission's proposal, but adding bans on AI practices regarding the generation of sexual and intimate content without 'freely-given, specific, informed, unambiguous and explicit consent' or child sexual abuse material. The Council, however, favoured fixed deadlines for the delayed application of high-risk AI

rules: 2 December 2027 for stand-alone high-risk AI systems, and 2 August 2028 for high-risk AI systems embedded in products. It maintained a transitional period of six months to comply with obligations to mark AI-generated content for systems placed on the market before 2 August 2026. The Council also reinstated a simplified registration obligation for non-high-risk AI systems and the standard of strict necessity for processing special categories of personal data for bias correction. In addition, the Council clarified the responsibilities of the AI Office regarding the supervision of AI systems built on general-purpose AI models, specifying that this applies where the model and the system are developed by the same provider or by providers that are part of the same undertaking. The Council suggested that national authorities should retain responsibility in some cases, such as in law enforcement, border management, and financial institutions. Finally, the Council requested that the Commission provide guidance to help economic operators of high-risk AI systems covered by sectoral legislation comply with the AI Act's high-risk rules.

Parliament assigned the file to the IMCO and LIBE committees, appointing Arba Kokalari (EPP, Sweden) and Michael McNamara (Renew Europe, Ireland) as rapporteurs. The IMCO and LIBE committees adopted a [joint report](#) on the file on 18 March 2026 with 101 votes in favour, 9 against and 8 abstentions. The [report](#) aligns with the Council's proposal for fixed deadlines for the delayed application of rules governing high-risk AI systems. Additionally, it proposes a targeted ban on AI systems that generate sexual and intimate content without consent and reformulates the conditions for processing special categories of personal data for bias detection and correction. The report also reinstates a simplified registration requirement for non-high-risk AI systems, maintains the extension of the simplified documentation process for medium-sized companies with minor modifications on fines, and lightens the regulatory burden for AI systems embedded in products already subject to sector-specific rules. Furthermore, it modifies the transitional period for compliance with obligations to mark AI-generated content to three months.⁷ Finally, it envisages that providers and deployers of AI systems should support the improvement of AI literacy among their staff and ensure that the Commission and Member States encourage and support AI literacy in society.

Once Parliament's mandate is approved in plenary (vote expected during the March II part-session), the EU co-legislators can launch trilogue negotiations.

EUROPEAN PARLIAMENT SUPPORTING ANALYSIS

Marcelin, T., [Simplifying EU digital laws for competitiveness](#), EPRS, European Parliament, November 2025.

Niestadt, M., [Making Europe an AI continent](#), EPRS, European Parliament, September 2025.

Marcelin, T., [AI Act implementation timeline](#), EPRS, European Parliament, June 2025.

Madiega, T., [Artificial intelligence act](#), EPRS, European Parliament, September 2024.

ENDNOTES

- ¹ Within the meaning of the [Digital Services Act](#).
- ² Not just high-risk AI models, which was the case previously.
- ³ Such as deleting the personal data once the bias has been corrected.
- ⁴ The list of views provides an overview of the debate and is not an exhaustive account of all perspectives.
- ⁵ The Commission proposal applies a different application timeline: 12 months after the standards have been published for Annex I systems and six months for Annex III systems.
- ⁶ Among the [members of the CCIA](#) are some of the biggest US technology companies, such as Amazon, Apple, Google, Intel and Meta.
- ⁷ The Commission and the Council proposed a six-month transitional period.

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