

CEE Digital Coalition call for a more ambitious Digital Omnibus on AI Regulation Proposal

13th February 2026

We are organizations collaborating within the CEE Digital Coalition, a collective of digital and advanced technology industry bodies from Central and Eastern European Member States. Our goal is to align the region on its digital journey and jointly accelerate the digital transformation of the regional economy and information society. We hereby wish to comment on the current work on the [Digital Omnibus on AI Regulation Proposal](#).

The Digital Omnibus undeniably represents progress, showing a greater dedication to simplification and practical enforcement. Specifically, streamlined high-risk assessments for the AI Act, expanded data utilization for bias mitigation, and a more pragmatic stance on AI literacy —are beneficial. These changes enhance legal certainty and lessen unnecessary administrative loads on businesses. However, we believe the current Omnibus proposal ultimately falls short of its true potential.

For the Digital Omnibus on AI Regulation Proposal to truly provide simplification, enhanced legal certainty, and significant competitiveness advantages for enterprises throughout Central and Eastern Europe (CEE) and the entire EU, the European Union needs more ambitious approach:

- > **The Omnibus should extend the compliance period for Article 50 to 12 months instead of six in order to ensure legal clarity and effective implementation. This extension should apply to both new and existing AI systems and cover the full set of transparency requirements stemming from Article 50 of the AI Act.**

The Omnibus must revise the unrealistic compliance deadlines across the AI Act, particularly for Article 50 concerning generative AI provenance and transparency. The proposed six-month compliance window for Article 50 (e.g., marking obligations and deep fake labeling) is insufficient. The Code of Practice, essential for implementing these requirements, is expected close to the

August 2026 deadline. A minimum period of six months is required for both providers and deployers to implement the obligations derived from Article 50 of the AI Act, as detailed in the final Code of Practice, following official publication of the Code.

> **Set firm application dates for high-risk AI systems.**

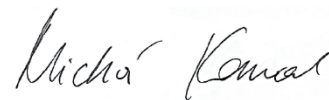
The Omnibus should establish clear and fixed compliance dates for high-risk AI systems: December 2027 for Annex III and August 2028 for Annex I.

Leaving these deadlines dependent on future Commission decisions creates uncertainty and risks reducing effective compliance timelines to as little as six months. Clear, objective criteria are also needed to define what constitutes “adequate measures” for compliance.

We urge the Member States to implement these changes, as we believe they are essential for achieving ambitious goals to streamline EU digital regulations and enhance competitiveness and prosperity both regionally and globally.

Sincerely,

Michał Kanownik

A handwritten signature in black ink, appearing to read 'Michał Kanownik'.

Leader of CEE Digital Coalition

About CEE Digital Coalition

CEE Digital Coalition is an informal regional alliance of digital and technology organisations from Central and Eastern Europe, established to strengthen cooperation across the CEE region and to ensure a stronger, coordinated voice of CEE stakeholders in European digital policymaking.

The Coalition brings together 17 organisations from 12 countries, representing a broad spectrum of the digital economy, including ICT, new technologies, innovation, and digital services. CEE Digital Coalition focuses on promoting digital transformation, innovation-friendly regulation, cybersecurity, digital skills, and the competitiveness of the CEE region, while engaging in dialogue with EU institutions, national governments, and key international partners. More: www.ceedigital.org