

Newsletter



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Digital Omnibus **Commission Proposals to Simplify AI, Cybersecurity and Data Rules**

The European Commission's Digital Omnibus proposal constitutes a significant normative intervention in the architecture of EU digital regulation. Rather than introducing new substantive obligations, the initiative operates as a legislative consolidation mechanism, aimed at harmonising and simplifying the fragmented regulatory landscape governing artificial intelligence (AI), cybersecurity, and data protection. Its essence lies in the pursuit of coherence: reducing duplicative provisions, aligning enforcement timelines, and ensuring that compliance frameworks remain proportionate to technological realities.



From a legal standpoint, the Omnibus amends and interlinks key instruments—the AI Act, GDPR, Data Act, and NIS2 Directive—while repealing overlapping regimes such as the Data Governance Act and the Open Data Directive. This legislative technique reflects a shift from rule proliferation to systemic integration, a trend increasingly visible in EU digital law. Notably, the postponement of high-risk AI obligations from August 2026 to December 2027, coupled with the conditionality of enforcement upon the availability of harmonised standards, illustrates a pragmatic approach to normative effectiveness: law is calibrated to technical feasibility.

Equally important is the Omnibus's treatment of data governance. By clarifying the threshold at which data ceases to qualify as “personal” and introducing lawful-use carve-outs for low-risk purposes, the proposal seeks to reconcile the principle of data minimisation with the operational needs of AI development. The establishment of a single-entry point for cybersecurity incident



reporting further exemplifies the move toward procedural rationalisation, replacing a multiplicity of reporting obligations with a unified compliance channel.

The legal significance of the Digital Omnibus extends beyond its technical provisions. It embodies a normative balancing act between fundamental rights protection and regulatory proportionality, rejecting both rigid formalism and unqualified deregulation. While critics caution against the dilution of safeguards, the proposal does not dismantle substantive guarantees; rather, it reconfigures their operationalisation within a more integrated framework.

In doctrinal terms, the Omnibus signals an evolution in EU legislative method: from sectoral codification toward horizontal harmonisation, from prescriptive rigidity toward adaptive governance. Its success will ultimately depend on whether this recalibration preserves the constitutional principles underpinning EU digital law—privacy, security, and accountability—while delivering the legal certainty and flexibility demanded by a rapidly evolving technological ecosystem.



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