



Significant Amendments to the EU AI Act:

Digital Omnibus Agreement Updates the Implementation Timeline

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The European Parliament and the Council of the European Union (“EU”) reached a provisional agreement on 7 May 2026 on the “Digital Omnibus on AI”^[1], which aims to simplify the regulatory framework governing artificial intelligence while fostering innovation. The agreement was subsequently adopted by the European Parliament on 16 June 2026 and received final approval from the Council of the European Union on 29 June 2026.

The agreement introduces targeted amendments to the EU AI Act (Regulation (EU) 2024/1689) (the “AI Act” or the “Regulation”).

The Key Amendments

Revised Implementation Timeline

The obligations applicable to AI systems used in certain high-risk areas, including biometric categorization and identification, critical infrastructure, education, employment, migration, asylum and border control, will become applicable as of 2 December 2027, instead of 2 August 2026 as originally envisaged.

By contrast, the rules applicable to AI systems embedded in products such as medical devices, machinery and autonomous vehicles, where such AI systems perform safety functions, will start to apply on 2 August 2028.

The application date of the obligation to use watermarks for AI-generated content has been postponed to 2 December 2026 for AI systems placed on the market before 2 August 2026. However, it should be noted that the transparency obligations remain largely subject to the original implementation timeline, and 2 August 2026 continues to be a key compliance milestone.

In addition, the obligations requiring national competent authorities to establish AI regulatory sandboxes have been postponed from 2 August 2026 to 2 August 2027.

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1. “The Digital Omnibus on AI” refers to the legislative package proposed by the European Commission in November 2025 as part of the EU’s simplification agenda, introducing targeted amendments to several digital legislative instruments, including the EU AI Act. The package aims to make the implementation of the AI Act more predictable and practical for businesses, while preserving the safeguards relating to public safety, fundamental rights and the protection of individuals.

New Prohibitions

The adopted amendments also expand the list of prohibited AI practices aimed at protecting individuals. Accordingly, the use of AI systems that generate non-consensual sexual content or intimate images, as well as AI systems that generate child sexual abuse material (for example, nudification applications that manipulate a person's image to depict them as nude or engaged in sexually explicit conduct without their consent), is expressly prohibited. The obligation to comply with these prohibitions will become applicable as of 2 December 2026.

Simplification for Businesses

Certain regulatory simplifications available to small and medium-sized enterprises ("SMEs") have been extended to also cover small mid-cap companies.

In addition, the interaction between the AI Act and the EU product safety framework, in particular the Machinery Regulation (Regulation (EU) 2023/1230), has been clarified. Accordingly, machin-

The legal basis for the processing of special categories of personal data for the purposes of bias detection and mitigation has been extended, subject to the requirement of strict necessity, to also cover providers and deployers of AI systems and AI models that are not classified as high-risk. In addition, providers are no longer required to register in the EU database AI systems that they have determined not to be high-risk and are therefore exempt from high-risk classification.

ery products falling within the scope of sector-specific product safety legislation will, as a general rule, be subject only to the relevant sectoral legislation. This aims to prevent overlapping compliance requirements arising from the simultaneous application of both the AI Act and sector-specific rules.

Clarified Supervisory Powers

The enforcement and supervisory powers of the AI Office have been clarified. In particular, the amendments seek to ensure more effective supervision and enforcement by the AI Office over systems built on general-purpose AI ("GPAI") models, as well as AI systems

integrated into very large online platforms and search engines. At the same time, the powers of national authorities remain unaffected in areas such as law enforcement, border management, judiciary and financial supervision.

The Updated Implementation Timeline

2025, February 2nd

The prohibitions applicable to AI systems posing an unacceptable risk entered into application.

2025, August 2nd

The obligations applicable to providers of GPAI models entered into application.

Member States are also required to designate their competent authorities and establish rules on administrative fines.

2026, August 2nd

The AI Act becomes generally applicable. In particular, the transparency obligations under Article 50, as well as the obligations relating to the watermarking of AI-generated content, become applicable on this date.

2026, December 2nd

The transitional period granted to providers, in respect of the watermarking obligation for AI systems placed on the market before 2 August 2026, expires.

The obligation to comply with the prohibitions applicable to AI systems that generate non-consensual sexual content or intimate images, as well as AI systems that generate child sexual abuse material, becomes applicable.

2027, August 2nd

The obligations requiring national competent authorities to establish AI regulatory sandboxes enter into application.

2027, December 2nd

The obligations applicable to stand-alone high-risk AI systems used in the areas of biometric categorization and identification, critical infrastructure, education, employment, migration, asylum and border control become applicable.

2028, August 2nd

The obligations applicable to high-risk AI systems integrated into medical devices, machinery, autonomous vehicles and similar products become applicable.

By the end of 2030

AI systems that constitute a component of large-scale IT systems operating in the areas of freedom, security and justice must be brought into compliance with the AI Act.

Assessment for Companies Established in Türkiye

The AI Act has a broad extraterritorial scope. Accordingly, the AI Act may also apply to providers that place AI systems or GPAI models on the EU market, even if they are not established in the EU, as well as to providers and deployers of AI systems whose outputs are used within the EU.

The revised implementation timeline provides companies established in Türkiye with additional time to reassess their compliance programmes and complete the necessary technical and organizational preparations.

Next Steps

The legislative process was completed with the final approval of the Council of the European Union on 29 June 2026. The amendments are expected to be published in the Official Journal of the European Union soon and will enter into force three days after their publication.



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