



Council of the European Union
General Secretariat

Brussels, 23 February 2026

WK 17679/2025 ADD 1 REV 1

LIMITE

SIMPL

ANTICI

DATAPROTECT

CYBER

TELECOM

CODEC

PROCIV

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

WORKING DOCUMENT

From: General Secretariat of the Council
To: Antici Group (Simplification)

Subject: Omnibus VII (Digital Omnibus on AI) - compiled comments (ddl 18/12)

Following the meeting of the AGS on 15 December on the Omnibus VII, delegations will find additional comments received from BG for guiding questions on the Digital Omnibus (AI).

Written contribution of Bulgaria to the AGS discussion of 15.12. 2025 on Digital Omnibus on AI

Question 1: Do Member States agree that there is a need to extend the implementation timelines in the AI Act? – Yes, Bulgaria considers that an extension of the deadlines is necessary.

Question 2: Regarding the mechanism for extension of timelines for high-risk AI-systems as proposed by the Commission in article 1, paragraph 31, litra a, first part, in the Digital Omnibus on AI, Member States are invited to express their preference between the following options setting the direction going forward:

- a. Support the mechanism for extending the timelines as put forward by the Commission.
- b. Support the mechanism but prefer a stronger role for the Member States/AI Board in assessing whether the support measures are adequate. Bulgaria supports option „b“ for a stronger role of the Member States/AI Board
- c. Prefer a timeline not dependent on the availability of support measures.
- d. Prefer another solution. Please elaborate.

Question 3: Regarding the length of the extensions of the timelines for high-risk AI-systems as proposed by the Commission in article 1, paragraph 31, litra a, second part, in the Digital Omnibus on AI to 2 December 2027 for Annex III AI systems and to 2 August 2028 for Annex I AI systems, Member States are invited to express their preference between the following options setting the direction going forward:

- a. Support the length of the extensions of the timelines as proposed by the Commission.
- b. Prefer longer extensions – if so, how long?
- c. Prefer shorter extensions – if so, how short?
- d. Prefer another solution. Please elaborate.

Bulgaria supports the proposed new mechanism (option „a“) where the high-risk requirements would become applicable 6 months after a decision for Annex III systems and 12 months after for Annex I systems and if such a decision is not adopted - 2 December 2027 for Annex III systems and 2 August 2028 for Annex I systems.

Question 4: In relation to this, do you agree to distinguish in the timelines for Annex I high-risk AI systems and Annex III high-risk AI systems? Yes, we agree with the distinction in the deadlines for high-risk AI systems in Annex I and Annex III, considering that the implementation deadlines for Annex III systems should be shorter, as these systems do not depend to the same extent as Annex I systems on standards and third-party assessment.

In this regard, Bulgaria expresses its position that the deadline for establishing at least one regulatory sandbox, as provided for in Article 57 of the Regulation, should be extended by one year. The arguments for this are the extension of the timeline until December 2027 of the obligations for AI systems under Annex III.