

## Open Joint Letter against the Delaying and Reopening of the AI Act

9 July 2025

Ms. Henna Virkkunen, Executive Vice-President, Commissioner for Tech Sovereignty, Security and Democracy

Mr. Stéphane Séjourné, Executive Vice-President, Prosperity and Industrial Strategy

Mr. Valdis Dombrovskis, Commissioner for Economy and Productivity; Implementation and Simplification

We, the undersigned experts, academics and organisations committed to protecting fundamental rights, promoting consumer protection and fostering responsible innovation, are writing to express our collective concerns regarding the development of the forthcoming omnibus proposal aiming to simplify the digital rulebook (the “Digital Simplification package”), which reportedly could include revisiting the Artificial Intelligence Act.

Following the Commission’s public statements and the recent meetings held at the Council of the EU level on 6<sup>1</sup> and 24 June 2025,<sup>2</sup> we are especially concerned by the growing pressure regarding a potential “stop the clock” mechanism to suspend or delay the implementation<sup>3</sup> and enforcement of the AI Act.

We firmly oppose any attempt to delay or re-open the AI Act, particularly in light of the growing trend of deregulation, which risks undermining key accountability mechanisms and hard-won rights enshrined in EU law across a wide range of protections, including for people, the planet, justice and democracy.<sup>4</sup>

The EU “simplification” agenda should not be used to drive deregulation, especially in the absence of credible evidence that this would be necessary or effective. The EU regulatory framework is founded on values and principles of human dignity, freedom, equality and non-discrimination, promoting an open digital environment based on fundamental rights and consumer protection: efforts to simplify should build on hard-won legal protections, not

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<sup>1</sup> Council of the EU, AOB for the meeting of the Transport, Telecommunications and Energy Council on 6 June 2025 : [Outcomes of the discussions on simplification activities in the digital field, Doc. 9383/25](#).

<sup>2</sup> Council of the EU, [Working Party on Telecommunications and Information Society, Agenda, Doc. CM 3244/25](#), 24 June 2025.

<sup>3</sup> [Polish Council Presidency suggests to "stop-the-clock" on AI Act implementation - Euractiv](#), 4 June 2025.

<sup>4</sup> [Deregulation Watch | Corporate Europe Observatory](#), 26 June 2025.

dismantle them. We recall that the first omnibus proposal was already widely criticised<sup>5</sup> for targeting environmental safeguards. We therefore call on the Commission to refrain from pursuing the deregulation of the EU digital rulebook and focus its efforts on effective implementation and enforcement, to ensure strong rights protections, better law-making, and legal certainty.

The laws purportedly within the scope of the Digital Simplification package<sup>6</sup> play a crucial role in ensuring that the EU's approach to technology and innovation is rooted in fundamental rights, consumer protection, safety and trust. The AI Act is an important embodiment of this ambition, introducing safeguards and prohibiting some types of AI based on identified risks to fundamental and consumer rights.

We welcome efforts seeking to increase coherence and clarity across the EU digital rulebook. However, recent experience shows that the scope of proposed amendments can go far beyond the initial objectives and be detrimental to the public interest and undermine fundamental rights. The first omnibus package framework presented by the European Commission this year significantly diluted the reach and impact of EU corporate sustainability laws, undermining their core purpose and prompting an ongoing investigation by the European Ombudsman into procedural failings.<sup>7</sup> Proposals to reopen the GDPR have drawn strong criticism for threatening fundamental rights and rolling back key accountability safeguards<sup>8</sup>. Against this backdrop, even “targeted changes”<sup>9</sup> to the digital rulebook could have counterproductive consequences contrary to the spirit of the legislation, rolling back fundamental rights, sending the wrong signal about Europe's commitment to rights-respecting tech governance, and undermining legal certainty.

We call upon the Commission to prioritise the full implementation and proper enforcement of the AI Act instead of re-opening or delaying its implementation, especially in light of the current implementation challenges that already risk weakening the AI Act's ambition. Key implementation processes, such as the Standardisation process<sup>10</sup> and the GPAI Code of Practice<sup>11</sup> have long received widespread criticism from civil society for being heavily influenced by industry. The current calls from parts of industry to “stop the clock” on the implementation of the AI Act due to standards not being available in time is therefore especially regrettable, given that industry actors are currently those mainly responsible for delaying this process. The GPAI Code of Practice has also received strong criticism from the Joint Working Group of the implementation and enforcement of the AI Act<sup>12</sup> and the Corporate Europe Observatory has filed

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<sup>5</sup> [OHCHR Raises Concerns over “Omnibus” Proposal That Risks Undermining EU Corporate Sustainability Directive](#).

<sup>6</sup> The Data Governance Act, the Data Act, the Cybersecurity Act, the Cyber Resilience Act, the EU Chips Act and the Artificial Intelligence Act – European Commission: [‘A simpler and faster Europe. Communication on implementation and simplification’](#)

<sup>7</sup> European Ombudsman, [Case 983/2025/MAS](#), 21 May 2025.

<sup>8</sup> [Open Letter: Reopening the GDPR is a threat to rights, accountability, and the future of EU digital policy](#), 19 May 2025.

<sup>9</sup> [EU Commission opens door for ‘targeted changes’ to AI Act – POLITICO](#)

<sup>10</sup> [Bias baked in | Corporate Europe Observatory](#)

<sup>11</sup> [Coded for privileged access - How Big Tech weakens rules on advanced AI | Corporate Europe Observatory 30 April 2025](#).

<sup>12</sup> [Letter to Joint Working Group](#) on the implementation and enforcement of the Artificial Intelligence

a complaint against the AI Office over a conflict of interest with the Ombudsman<sup>13</sup>. In this context, it is worrying that the Advisory Forum, established under Article 67 to ensure formal involvement of civil society in the implementation and application of the AI Act, has not yet been established. In July 2024, over 30 civil society organisations issued recommendations on the shape and functioning of the Advisory Forum, which remain unaddressed by the AI Office.<sup>14</sup> These concerning developments follow the recent withdrawal of the AI Liability Directive, a proposal that sought to better protect consumers and individuals harmed by an AI system by harmonising liability rules.<sup>15</sup>

People in Europe should be able to fully enjoy the benefits of new technologies. The EU has strived to create an environment which places fundamental rights, regulatory certainty and consumer trust at the center. Using the Digital Simplification package to revisit key safeguards and protections enshrined in law after years of comprehensive interinstitutional negotiations would undermine both<sup>16</sup>, and call into question Europe's real competitive advantage: putting consumer and fundamental rights at the center of all legislation.

We therefore call on the Commission to refrain from pursuing a deregulation agenda and champion the proper enforcement and implementation of the AI Act and the wider EU digital rulebook. Moreover, in line with the European Commission's Better Regulation Principles, all proposals must follow a transparent and inclusive process and that any proposed measures should be strictly based on evidence and necessity, including a comprehensive impact assessment and an inclusive public consultation. We also urge the AI Office to prioritise developing and strengthening key governance bodies under the AI Act, specifically setting up the Advisory Forum to provide the structure for meaningful consultation with multi-stakeholder groups, including civil society.

We remain at your disposal for a meeting and trust the Commission to deliver on the promise of the AI Act.

Sincerely,

## Signatories

AccessNow  
AI Accountability Lab  
AI Forensic  
Algorights  
AlgorithmWatch

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Act, 10 December 2024.

<sup>13</sup> [Lobby watchdogs file complaint against AI Office over conflict of interest](#) | Corporate Europe

Observatory, 3 June 2025.

<sup>14</sup> [Civil society recommendations for the AI Act advisory forum](#), 4 July 2024.

<sup>15</sup> [Open Letter to the European Commission on the announced withdrawal of the AI liability Directive](#), 7 April 2025.

<sup>16</sup> [EU lawmakers warn against 'dangerous' moves to water down AI rules](#) | Financial Times.

Alternatif Bilisim  
Amnesty International  
ANEC – The European consumer voice on standardisation  
ARTICLE 19  
Aspiration  
BEUC - The European Consumer Organisation (BEUC)  
Bits of Freedom  
Centre for Democracy and Technology Europe (CDT Europe)  
Citizens Network Watchdog Poland  
Civil Liberties Union for Europe (Liberties)  
COMMUNIA  
Corporate Europe Observatory  
Danes je nov dan  
Digitalcourage  
Digitale Gesellschaft (Germany)  
Digital Society (Switzerland)  
Epicenter.works  
European Centre for Not-for-Profit Law (ECNL)  
European Civic Forum (ECF)  
European Disability Forum (EDF)  
European Digital Rights (EDRi)  
European Public Service Union (EPSU)  
Federación de Consumidores y Usuarios (CECU)  
Fundación Ciudadana Civio  
Health Action International  
Hermes Center  
IA Ciudadana Coalition  
Intérêt à agir  
IT-Pol Denmark  
Lafede - justiça global  
Open Future  
Panoptikon Foundation  
Political Watch  
Politiscope  
Statewatch  
The Future Society  
Witness  
5Rights Foundation

### **Individual signatories**

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