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AI the Brussels Way: Simplifying the (De)Regulation?

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Abstract: Brussels is on a crusade to strengthen the European Union (EU)'s competitiveness by "simplifying" the regulatory burdens stemming from its "rule-making" approach. As part of this effort, the European Commission introduced the Digital Omnibus, a series of regulatory interventions aimed at simplifying the EU's digital rules. This study examines stakeholder feedback from the consultation that preceded the initial proposal, focusing on its impact on the Artificial Intelligence Act. Specifically, it examines how different actors refer to and seek to influence such "regulatory simplification" within the context of three regulatory tools: artificial intelligence (AI) regulatory sandboxes, AI standards, and the general-purpose AI code of practice (GPAI CoP). Using discourse network analysis to examine actors' regulatory positions, the results suggest that, within the simplification agenda: (1) there is little substance beyond an aim to delay implementation timelines; (2) AI standards are used as scapegoats for delays; (3) GPAI CoP is a contentious tool with diverse and conflicting interpretations of what regulatory "simplification" entails; and (4) AI regulatory sandboxes are not a priority for actors interested in shaping the Digital Omnibus. The findings contribute to understanding the EU's regulatory approach amid an apparent shift away from rule-making first to competition- and innovation first.

Keywords: Digital Omnibus, AI Act, regulatory simplification, deregulation, discourse network analysis

1. Introduction

"*Simplification, implementation, and enforcement*" are stated as the three core pillars of the second von der Leyen Commission[1]. They also point to a shift in the Brussels way of regulation: aim for a simpler, faster Europe. But this effort, as laid out in the trilogy of high-level reports by Letta, Heitor, and Draghi [1–3], may be more about deregulation than it sounds, while dressed up as support for the European Union (EU)'s innovation. A prime example is artificial intelligence (AI), where "there is an opportunity for the EU to carve out a leading position in segments of the evolving generative AI tech" [3]. Here, as with other new technologies, the suggestion is that the EU fails to turn innovation into commercial success because European companies trying to scale up are held back by inconsistent, restrictive rules.

The rhetoric has led to a "regulatory simplification agenda" culminating in the Digital Omnibus, which, among others, amends the Artificial Intelligence Act (AI Act)[2] in an effort to foster innovation and help Small and Medium-sized Enterprises (SMEs) in the single market. The agenda aims to fix single-market fragmentation, seen as the main reason the EU trails the less-fragmented US and China on digital champions [3]. However well-intentioned, the agenda has raised concerns that it could lead to deregulation with legitimacy problems [4] and to friction as simplified rules meet complex AI systems.

In practice, the goals of simplifying compliance and boosting innovation were already built into the AI Act through tools such as standards, codes of practice (CoP), and regulatory sandboxes. For instance, the AI Act follows the EU's New Legislative Framework approach [5], in which regulations set broad, essential requirements (e.g., safety, transparency), while European standards fill in the specific technical details. CoPs work the same way for general-purpose AI (GPAI) models, such as GPT systems. Regulatory sandboxes, meant to allow experimentation in the spirit of innovation, have even been called a form of deregulation, for example, when used as a "safe harbor" where rules are temporarily suspended or waived to allow testing [6]. Given this antecedent, a new "simplification" agenda raises an obvious question: what has changed in this fresh narrative of "simplified" regulation, when the AI Act already built simplification in from the start?

This study asks what this shift toward EU regulatory simplification means, as seen through the eyes of the actors shaping AI regulation. To limit the scope, the analysis centers on three regulatory tools: AI regulatory sandboxes, AI standards, and the general-purpose AI code of practice (GPAI CoP), selected on both theoretical and empirical grounds. Theoretically, these

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[1] European Commission, simplification, implementation and enforcement, accessed August 26, 2026, https://commission.europa.eu/law/law-making-process/better-regulation/simplification-implementation-and-enforcement_en

[2] Regulation (EU) 2024/1689 of the European Parliament and of the Council of June 13, 2024, laying down harmonized rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act).

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are the tools the AI Act itself designed as routes to simplified compliance through technical guidance and by providing a supervised environment meant to keep the regulation future-proof (AI Act, Recitals (109), (121), (138), and (139)). Thus, a simplification agenda that reopens the AI Act therefore acts on the AI Act's own simplification tools. Other tools, such as conformity assessment, notified bodies, and market surveillance authorities, were excluded because they enforce compliance rather than define what is substantively required; they are the object of simplification measures, not instruments of simplification. Empirically, these three tools also anchored and limited the study's scope when examining actors' feedback. Thus, the study is guided by the following research questions (RQs):

> *RQ1: What do actors refer to when they talk about regulatory "simplification" in relation to the Digital Omnibus and AI regulation?*
>
> *RQ2: How are actors trying to influence the implementation of AI regulatory tools through their ideas of "simplification" as shown in their feedback preceding the Digital Omnibus?*

To answer these questions, the research draws on data from the European Commission's call for evidence (September 16–October 14, 2025) on the "Simplification – digital package and omnibus initiative"[3]. These data are examined using discourse network analysis (DNA) [7]. The goal is to add to the literature on regulation and AI governance by analyzing the aims of "regulatory simplification" through these particular tools.

2. Background

The "regulatory simplification" narrative peaked with the Digital Omnibus regulation. Still, it didn't start there; it followed a series of public consultations and calls for evidence on digital rules, covering data, cybersecurity, and AI. Those consultations flagged several problems, including delays in naming market authorities and conformity-assessment bodies, as well as a lack of standards. In response, the European Commission (EC) proposed targeted "simplification measures" that became the Digital Omnibus interventions: specific regulations amending existing rules (e.g., General Data Protection Regulation (GDPR), Digital Operational Resilience Act (DORA), Network and Information Systems Directive (NIS2)). For AI, Regulation 2026/1744, the "Digital Omnibus on AI," is a standalone regulation amending the AI Act[4] as part of the simplification effort.

To contextualize, in the regulatory narrative, simplification is treated either as a synonym for better regulation or as a softer term for deregulation [8]. In the AI regulation literature, discussions of simplification focus mostly on deregulation, while the idea of simplification as a route to better regulation is treated as only a distant possibility [9]. In other words, proponents often claim that simplification-as-deregulation causes no harm, while opponents argue that trust built through regulation is what sustains technology business models [10]. Thus, the regulatory simplification agenda can be understood as having two sides.

On the one hand, simplification as "deregulation" has both defenders and critics. Levi-Faur [11], for instance, argues that, in theory, neoliberalism favors deregulation—but in practice, regulation is still needed because the government has a role in curbing negative side effects. Beckert [12], meanwhile, argues that deregulation, alongside privatization and globalization, creates legitimacy problems while sharply limiting state power. For AI, deregulation is often seen as necessary because of regulatory costs and the threat of "innovation-killing regulation" [4]. In some cases, it's framed as a "regulatory sacrifice": governments rush to "temporarily" remove safeguards, fearing that regulation raises compliance costs and blocks the innovation needed to win the "AI arms race" [9]. But reports show that compliance costs primarily stem from national laws in EU countries and that European companies don't view regulation as the main barrier to investment [13].

On the other hand, simplification, labeled "better regulation" in the EU's ethos, is portrayed positively—an effort to cut regulatory burdens and related costs for individuals, businesses, stakeholders, and public authorities. Radaelli [14], for instance, describes "better regulation" as a form of meta-regulation: centrally imposed rules that organize key stages of the regulatory process, while also giving political leaders a flexible tool to justify shifting priorities in their reform agendas. For AI, better regulation is sometimes treated as a form of testing regulation—for example, through competitiveness tests, which measure overall impact, including compliance costs and administrative burdens, while maintaining that "[c]hecks should be performed by involving committees of industrial operators supporting the Commission in assessing the impact of all draft autonomous acts" [3]. But there's no agreement on whether better regulation should mean simpler tools, more comprehensive ones, or a broader, multidimensional idea of regulatory quality.

Put simply, there are different, even conflicting, ideas of what regulatory simplification means. To make actors' positions easier to categorize and analyze, this study treats the regulatory simplification agenda as spanning two ends of a spectrum. At one end is simplification through deregulation (simply "deregulation" here) for any position aimed at lessening the burden of EU regulation, whether by lowering regulatory standards or cutting compliance costs without reducing protection [10]. At the other end is simplification as better regulation (simply "simplification" here) for tasks such as combining, codifying, or repealing old laws to make them easier to understand, cutting the bureaucratic steps the public must go through, or removing outdated provisions [8].

3. Methodology and Findings

This study uses the EU's consultation-based regulatory process [15] to examine the "regulatory simplification" agenda, as evidenced by feedback from various actors in response to the EU Commission's call for evidence prior to the Digital Omnibus. This feedback provides valuable data, influencing the proposal and the final Regulation 2026/1744, making it a fruitful resource for examining how stakeholders' views shaped or influenced the Digital Omnibus in relation to AI's "simplification measures." The research questions are addressed through five steps: Step 1 involves scraping and PDF extraction; Step 2 focuses on data preparation; Step 3 covers keyword extraction and text coding; Step 4 includes

[3]European Commission, Simplification – digital package and omnibus, accessed August 26, 2026, https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14855-Simplification-digital-package-and-omnibus_en

[4]Regulation (EU) 2026/1744 of the European Parliament and of the Council of July 8, 2026, amending Regulations (EU) 2024/1689, (EU) 2018/1139 and (EU) 2023/1230 as regards the simplification of the implementation of harmonized rules on artificial intelligence (Digital Omnibus on AI).

network analysis of actor types and regulatory positions; and Step 5 examines discourse networks for congruence and conflict.

Overall, the various methodological steps involved AI assistance, with the level of assistance varying by step. Initially, several large language models were tested for the research tasks. Two proved unsuitable owing to recurrent software errors and limited performance on complex, multistep research tasks (e.g., inconsistent coding and loss of context across long documents). The analysis ultimately used Claude Sonnet 4.6 for AI-assisted web scraping, text extraction, text coding, and network analysis. Results were most reliable when tasks were divided into contained steps, each with detailed instructions, and each executed within a single session.

DNA [7] was used to map discourse structures within the policy debate by operationalizing each actor's expressed stance on a regulatory measure as a coded "position" and identifying congruence and conflict positions among actors. The method fits the research questions because it captures both what actors argue about and who aligns with whom, allowing structured comparisons across regulatory tools. Furthermore, it has proved fruitful in previous studies on technology regulation. For instance, it was used to map the coalitions on either side of a contested EU directive in the software-patents dispute [16] and, elsewhere, to examine how AI was defined as a policy problem in Germany, where it showed that most actors framed AI as an innovation policy rather than as a rights question [17].

Here, DNA is applied to study the "regulatory simplification" of an already adopted regulation, which is a new contribution. However, this study is primarily exploratory, examining how a defined set of actors discussed regulatory simplification around three regulatory tools during a single consultation window. It is not a representative survey of EU stakeholder opinion; thus, the frequencies reported below should be read as describing the data corpus rather than stakeholder opinion generally.

3.1. Methodological steps

3.1.1. Scraping and data extraction

Step 1 involved gathering data. AI assistance was used for writing a scraping script for text extraction (see database details in Appendix 1). Data were collected from the EC's portal, which included 512 "unique feedback"[5] entries from actors categorized, based on self-identification, as business association, company/business, nongovernmental organizations (NGOs), EU citizens, academic/research institutions, public authorities, trade unions, consumer organizations, non-EU citizens, and other (see further details in Appendixes 2 and 3).

[5]See footnote 3.

The script was designed to visit each actor's feedback page and either scrape available text or extract text from submitted feedback PDFs. Thereafter, the data were organized by date, actor type, name, country, text, and URL for each entry. Overall, this process yielded about 486 entries, though some feedback led to blank or inaccessible pages or duplicates.

A caveat is that the study encompasses 45 actors, with the limitation that the analyzed actors are those who both responded to the call for evidence and named at least one of the three regulatory tools. They are disproportionately organized, EU-level, and resourced enough to file a technical submission. This is due to the nature of public consultation. Thus, small firms and small players are under-represented, leading the corpus to capture the discourse of those equipped to participate in consultation as the relevant population for a study of consultation's influence.

3.1.2 Data preparation

Step 2 involved keyword-based extraction. AI assistance was used to write a script to process all entries and scan the resulting text for snippets that match specific keywords. The extraction was based on an inclusion criterion: a document was included only if it contained at least one keyword from two groups: Group 1 ("digital omnibus" OR "simplification") and Group 2 ("AI regulatory sandbox" OR "AI standards" OR "harmonized standards" OR "code of practice" OR "GPAI CoP"). In other words, for each Group 2 match, a roughly 1,200-character context window was extracted and retained only if a Group 1 keyword also appeared within that window, which is also a limitation of this study, as it maximizes precision over recall.

It resulted in 89 snippets representing a minimum estimate of relevant discourse coming from 45 actors. Manual verification confirmed that the original language of these snippets is English, eliminating concerns that machine translation might distort the discourse analysis for this dataset.

3.1.3. Keyword extraction and text coding

Step 3 involved text coding. In this step, the author instructed the AI model to (i) identify the actor's regulatory position selecting from five defined stances (pro-simplification, anti-simplification, pro-deregulation, anti-deregulation, neutral); (ii) identify the argument type used to justify that stance, using whichever label best captures the logical basis of the argument; and (iii) provide a brief rationale for each argument type assignment. The data were structured as actor-regulatory tool-snippet-source feedback text. In practice, the author was presented with a proposed coded text (e.g., Figure 1) that included a position with rationale and a proposed argument type (e.g., "reg-

Figure 1
Example of proposed coded text

```
#2 — DIGITALEUROPE | Business association | Tool: AI_standards

Cover/ToC of DIGITALEUROPE's AI recommendations. Lists: "Apply only when harmonised standards are available," "Remove common
specifications," "Remove unnecessary registrations." Framed as fixing AI Act provisions that "risk undermining Europe's
competitiveness."

- position: pro_simplification — uses simplification package to push AI Act reform
- argument_type: competitiveness — reform needed to protect European competitiveness
```

ulatory coherence") with rationale and was able to accept, reject, or modify the proposed coded text.

The author manually revised each proposed coded text and corrected errors. The corrections included incorrect assignment of regulatory position, clarifying the context of snippets, separation of coded text due to mixing of argument types or of regulatory tools (e.g., an actor talked about two regulatory tools in the same sentence), removing redundancies (e.g., a text was coded twice), and correcting misidentification of argument types (*cf*. the justification approach in [18]). Of the 89 retrieved snippets, 7 were split into two separate coded snippets each because they addressed two regulatory tools, and 16 snippets were excluded as duplicates or near-duplicates produced by overlapping context windows. This yielded a final dataset of 80 coded rows.

Reliability checks were conducted[6]. Another independent coder, working only from codebook definitions and without access to the original author's coding, recoded a random 20% subsample of 16 snippets; the author separately recoded a non-overlapping random sample of 20 snippets. Thereafter, agreement was assessed using Cohen's kappa (κ), which corrects observed agreement for chance agreement [19]. Between coders, agreement stands at 75.0% (κ = 0.508) for position and 50.0% (κ = 0.363) for argument type; within a single coder, agreement is 80.0% (κ = 0.684) and 70.0% (κ = 0.632).

Two factors influence how these results relate to the analysis. First, the discourse networks are based solely on the pro-stance versus anti-stance contrast; on that measure, agreement is 93.8% (κ = 0.818) between coders and 95.0% (κ = 0.875) within coders. Thus, replacing the second coder's assignment for 16 snippets results in the same number of edges for both congruence and conflict. Second, argument type, although absent from the network structures, is a weaker variable. However, disagreements mainly occurred around the boundary between technical feasibility and regulatory coherence. This accounts for 3 of the 6 argument disagreements within a coder and 2 of the 8 between coders, the most common pairing in each case. However, since both samples are small and lack neutral cases, these coefficients are indicative rather than exact.

In this phase, the author classified snippets by argument type. These types were not predefined but emerged inductively through AI-assisted coding. For each snippet, the model suggested an argument type, which the author reviewed and finalized. When no existing labels fitted the logic of an actor's feedback, new labels were created.

A regulatory position was assigned based on the actor's overall rhetorical stance toward a regulatory tool. For instance, supporting reductions or delays was coded as pro-simplification or pro-deregulation, depending on whether the framing focused on procedural improvements or reducing standards; opposing such reductions was coded as anti-simplification or anti-deregulation. If both perspectives were acknowledged without a firm stance, the snippet was labeled neutral.

The core distinction between simplification and deregulation is central to the analysis but practically difficult to implement. It was operationalized through a simple decision rule: does the actor seek an alternative approach to the same obligation, or a lesser obligation altogether? Requests that alter only the procedural aspects (e.g., phasing, sequencing, or timing) while keeping the substantive requirement intact were coded as simplification. If the request aimed to reduce protection levels or remove the requirement entirely (e.g., narrowing the scope of the regulation), it was coded as deregulation.

In some borderline cases, such as "reducing compliance cost" and "reducing bureaucratic complexity," which are conceptually adjacent, the coding scheme labeled them as simplification. However, what separated simplification from deregulation was not the magnitude of the cost saving but whether the underlying obligation remained. Where a snippet could be read either way, it was coded as simplification, a more constructive reading, and flagged. Thus, a caveat of the study is that the pro-simplification count is an upper bound, and the pro-deregulation count of 9 is a lower bound.

Step 3 initially led to the following argument types: regulatory coherence, technical feasibility, competitiveness, competition harm, legal certainty, rights protection, industry self-regulation, inclusive governance, and improved governance. The author manually revised the proposed argument types for consistency. When the logic was similar across different types, such as competitiveness and competition harm or inclusive governance and improve governance, the arguments were combined into a single argument type. This process resulted in the following unified argument types:

1) *Regulatory coherence* for text mentioning a need to reduce fragmentation, harmonize regulations, or avoid regulatory duplication.
2) *Technical feasibility* for text mentioning that timelines are too tight, standards are not ready, or regulatory implementation is complex.
3) *Competitiveness* for text mentioning that regulatory burden harms EU competitiveness, SMEs, or R&D.
4) *Legal certainty* for text mentioning a need for clear, predictable compliance rules.
5) *Rights protection* for texts mentioning consumer protection, safety, or fundamental rights.
6) *Industry self-regulation* for text mentioning maintaining compliance and reliance on industry-led standardization.
7) *Governance* for text mentioning the need for more resources for regulatory bodies or a need to include representation of a wider range of stakeholders in AI governance.

In some cases, such as those involving *regulatory coherence* and *technical feasibility*, it proved difficult to distinguish among argument types. This was resolved by examining what the actor wanted to change. Thus, for instance, regulatory coherence when feedback focused on duplication or misalignment among regulatory instruments, and technical feasibility when feedback focused on moving a timetable.

Argument type and position were coded independently of each other. Position captured the direction of an actor's stance toward a proposed measure; argument type captured the logical or rhetorical basis on which the position was justified. Thus, the same type of argument could support different, even opposing, positions. *Legal certainty* is the clearest case, spanning pro-simplification (5), pro-deregulation (3), neutral (2), and anti-simplification (2) positions. The discrepancy can be summarized as some actors claiming that postponement reduces compliance uncertainty, while others argue that the fixed deadline actually provides certainty for legal compliance planning.

However, certain argument types tended to be more one-sided. For instance, *technical feasibility* appears 31 times, always in support of simplification; rights protection appears 10 times, always in opposition. This concentration is a finding that will be fully developed in section 4.

[6] https://github.com/anapaulagonzaleztorres/AI_Act_Digital_Omnibus_on_AI_Simplification/tree/main/reliability

Table 1
Frequency of regulatory tools

Regulatory tool	Count
AI standards	52
GPAI CoP	25
AI sandbox	3

Table 2
Frequency of actors' regulatory positions

Position	Count
Pro-simplification	52
Pro-deregulation	9
Anti-simplification	9
Neutral	5
Anti-deregulation	5

Table 3
Frequency of arguments

Argument type	Count
Technical feasibility	31
Regulatory coherence	14
Legal certainty	12
Rights protection	10
Competitiveness	6
Governance	4
Industry self-regulation	3

Overall, this further illustrates the nature of the coding scheme, where position and argument type were coded independently in two sequential steps, with no rules linking them. Argument type encoded the rhetorical logic rather than its stance. Additionally, the codebook does not restrict any argument type from occurring with any position.

The full coding protocol, the decision rules for the recurring borderline cases, and the codebook of argument types are in Appendix 7. Summaries of the overall results from step 3 are presented in Table 1 for the frequency of regulatory tools, Table 2 for the frequency of individual actors' regulatory positions, Table 3 for the frequency of argument types, and Table 4 for the frequency of argument types by regulatory position.

3.1.4 Actors and regulatory position networks

Step 4 involved creating networks of actors, positions, and regulatory tools. Based on the results from previous steps, the purpose was to identify which actors held which positions, categorized as pro-simplification, pro-deregulation, anti-simplification, anti-deregulation, or neutral. As illustrated in Figure 2, this process involved producing a visualization of the DNA findings, representing each coded snippet with a dot node for actors and a square node for their positions. Essentially, it created a bipartite network in which actor nodes were linked to position nodes via edges representing each coded occurrence. Thus, whenever an actor expressed a position at least once, an edge connected the actor to that specific position.

In Figure 2, the top row features an aggregated representation of the actors who provided feedback during the call for evidence, color-coded by actor type. Node colors in figures use a colorblind-safe qualitative palette [20]. The bottom row displays position stances (e.g., "pro-simplification") with edges linking each actor type to a specific position. An edge indicates that, under the modal rule further described below, "this actor type took this position" for all regulatory tools.

Figure 2 and Appendix 4.4 display networks that consolidate all regulatory tools, highlighting that most feedback in the call for evidence (shown by thicker edges) was mainly driven by a pro-simplification stance. There are weaker edges indicating anti-simplification and anti-deregulation positions. Overall, some actor types are linked to multiple positions because their stances differ across various regulatory tools. For instance, an actor might be pro-simplification on AI standards but remain neutral on the GPAI CoP.

An aggregation rule was applied to construct the actor type-position network, collapsing multiple snippets into a single stance per actor per tool based on modal position. Ties were resolved by document order, and neutral-coded stances were excluded from congruence and conflict edges. Therefore, three actors (Culture Action Europe, Civil Liberties Union for Europe, and AFNOR) appear in the frequency tables but in neither network, so the networks comprise 42 actors. In one case, Civil Liberties Union for Europe holds one neutral and one anti-simplification snippet on the GPAI CoP, and its exclusion results from the tiebreaking rule (document order). Nevertheless, overall, neutral positions show limited connections, suggesting that most actors took clear stances. Additional details on actor type-position networks can be found in Appendix 4, which includes networks for each regulatory tool. An interactive version of the network is also available in Appendix 4.5.

3.1.5 Congruence and conflict analysis

Step 5 involved analyzing and developing congruence and conflict discourse networks to understand agreements and disagreements among actors. This step used an rDNA package [7] to link actors and positions across tools, in a combination matrix. Thereafter, a script was used to collapse the data, so that instead of analyzing each snippet separately, the analysis was performed for each actor's stance across regulatory tools to produce a single position. For example, if one actor had three snippets on AI standards, it took the most common position among them, resulting in a single clear stance per actor and tool.

Then, using the script, comparisons were made for every pair of actors within each regulatory tool (e.g., "Does DIGITALEUROPE agree with AMETIC?"). For each of the three regulatory tools, there was a check to determine whether they shared the same stance (e.g., both pro-simplification or both anti-simplification). If they did, a green (congruence) edge was drawn between them (e.g., DIGITALEUROPE ←→ AMETIC), with the thickness indicating how many tools they agreed on. If one is "pro" and the other is "anti," a red (conflict) edge was drawn, weighted by how many tools they clash on.

This step produced further discourse mapping. Congruence networks indicate coalitions, where actors are linked if they share the same position on a regulatory tool, with edge thickness denoting the number of shared position-regulatory tool pairs. Conflict networks indicate polarization; actors are connected if they take opposing positions on the same regulatory tool.

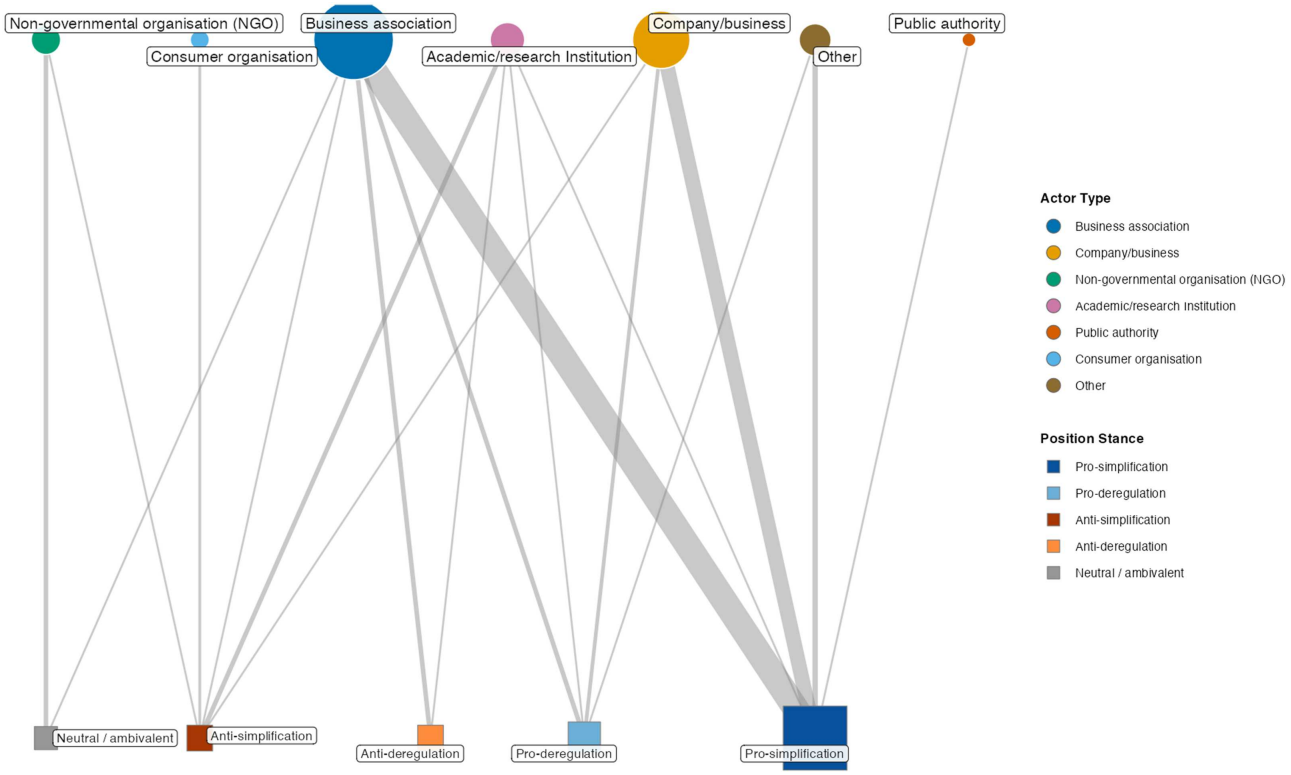
Table 5 summarizes the structural properties for the networks[7]. *Connected components* are groups reachable from one

[7] https://github.com/anapaulagonzaleztorres/AI_Act_Digital_Omnibus_on_AI_Simplification/blob/main/code/compute_network_stats.py

Table 4
Argument type by regulatory position

Argument type	Pro-simplification	Pro-deregulation	Neutral	Anti-simplification	Anti-deregulation	Total
Technical feasibility	31	–	–	–	–	31
Regulatory coherence	13	1	–	–	–	14
Legal certainty	5	3	2	2	–	12
Rights protection	–	–	–	6	4	10
Competitiveness	3	2	–	–	1	6
Governance	–	–	3	1	–	4
Industry self-regulation	–	3	–	–	–	3
Total	52	9	5	9	5	80

Figure 2
Actor type-position network for all regulatory tools



another by following edges; two components therefore mean two groups with no ties between them among the 42 connected actors. *Density* reflects the proportion of all potential ties that are realized among actors, while *modularity* measures how effectively the network segments into distinct subgroups; values below about 0.3 suggest no significant subgroup structure. The *highest weighted degree* counts an actor's ties, with each tool linking to a tie counted separately. The *highest betweenness centrality* indicates how much an actor serves as a bridge, with values ranging from 0 to 1. The "*highest*" means the table displays the maximum observed values; in the congruence network, eight actors share this top value.

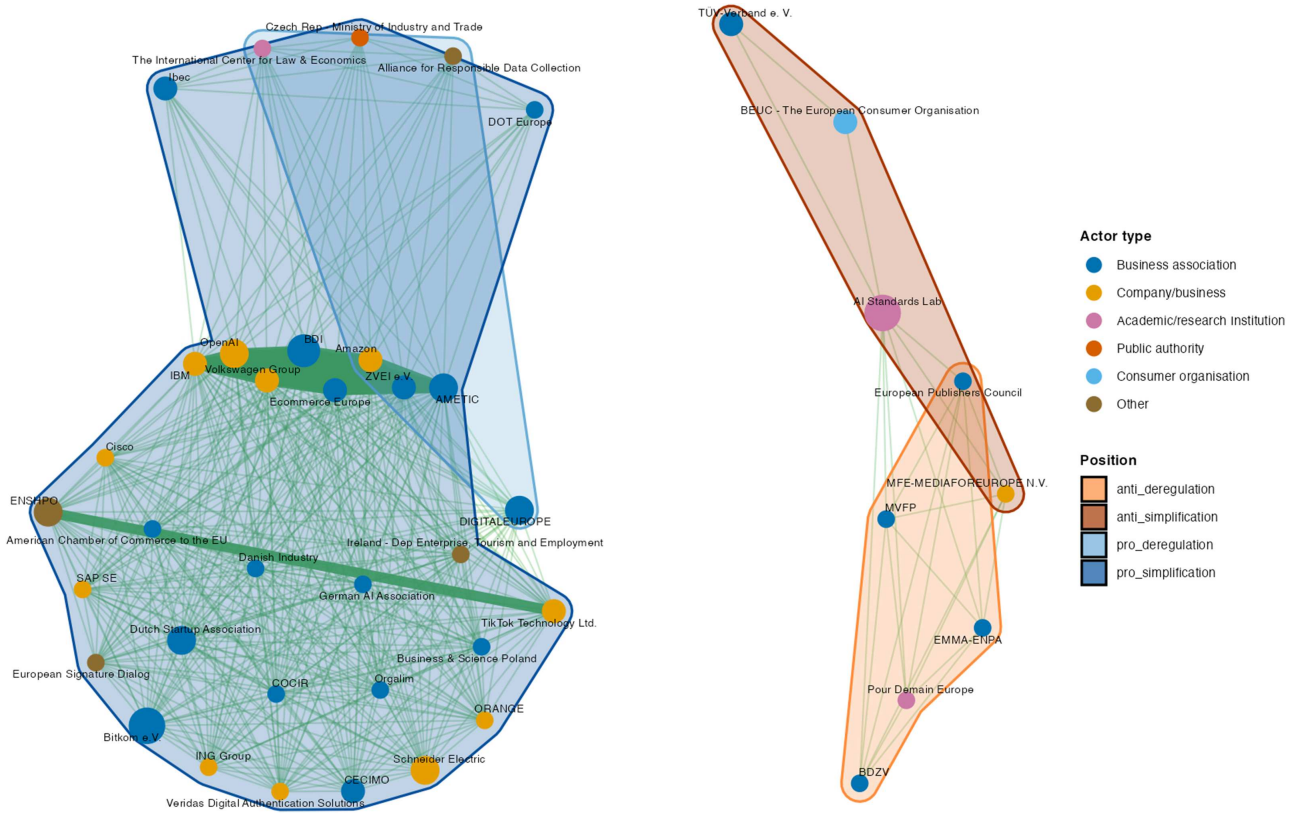
Overall, the structural properties suggest that consensus in this debate was broad, dense, and internally undifferentiated. Meanwhile, opposition was small, structurally disconnected, and borne disproportionately by a single actor. Thus, the networks are not about two sides arguing, but more about a single bloc and a few persistent actors in the opposition. The three excluded actors are those whose stances resolve to neutral; in this case, they are the corpus' three NGOs. Lastly, for network visualizations, an overlay was used to draw a shaded net around all nodes sharing the same position stance, with each net labeled in the corresponding legend.

For the congruence network, Figure 3 shows an aggregate of all regulatory tools, indicating which actors agree with one another. Each edge between two actors indicates they shared the same stance on at least one of three regulatory tools (AI regulatory sandboxes, AI standards, GPAI CoP). The more tools they agree on, the thicker the edge. For example, ENSHPO ←→ TikTok have a "thick connection" because they aligned on two regulatory tools (AI regulatory sandboxes and AI standards) with the same position (pro-simplification).

Table 5
Structural properties of the congruence and conflict networks for all regulatory tools

Measure	Congruence	Conflict
Actors in network	42	42
Actors excluded	3	3
Edges	452	167
Connected components	2	1
Density	0.525	0.194
Modularity	0.198	0.276
Highest weighted degree	39	41
Highest betweenness centrality	0.015	0.347

Figure 3
Discourse network analysis – Congruence network for all regulatory tools



The congruence network is very dense, with 452 connections, indicating strong agreement within each cluster and none across them. It highlights that the two components of the discourse do not merely disagree; in this corpus, they share no position on any of the three tools. This is because congruence edges are drawn only between actors who share a stance; the absence of any connecting edge indicates that the two groups share no position on any of the three tools.

In the coded corpus, the two components of the discourse do not occupy distant regions of a single discourse space; they occupy disconnected ones. Thus, since a single change to one actor's modal stance would be enough to join the two components, this disconnection should be read as a property of the corpus as coded rather than as a structural constant of the debate.

On one side stands a large, internally uniform pro-simplification coalition of companies and business associations; on the other stands a smaller but equally consistent coalition that is itself predominantly industry-based. See Appendix 5 for congruence DNA figures per regulatory tool.

The first component comprises 33 actors, each of whom holds a pro-simplification or pro-deregulation stance. 16 business associations, 11 companies, 4 actors classified as "other," 1 public authority, and 1 research institution. The second component comprises 9 actors, each of which holds an anti-simplification or anti-deregulation stance.

Within the dominant component, there is no meaningful sub-structure. Density among all connected actors is 0.525 and 0.811 within the 33-actor dominant component, while modularity is 0.198. Thus, the subgroupings visible in the layout are meant to aid visual representation rather than represent distinct coalitions. The pro-simplification bloc is best described not as a coalition of factions but as a single undifferentiated mass, and this is the most

cohesive structure in the dataset partly because of the congruence rule, under which the 28 actors coded as pro on AI standards form a clique by construction.

The composition of the opposing component is more surprising. Of its 9 members, 4 are business associations in newspapers, magazines, and publishers, 1 is a business association in technical inspection and conformity assessment, and 1 is a company. They are joined by 2 research institutions and 1 consumer organization. Opposition to regulatory simplification therefore comes mainly from industry, the part of "industry" actors that gains from rules staying in place. Publishers need the copyright and transparency obligations on GPAI to be enforced; conformity-assessment bodies depend on assessment being assessment. However, due to the aggregation rules, the lack of NGOs in the network reflects the methodology's tendency to merge actors into a single dominant stance, which consistently under-represents low-volume or internally divided actors.

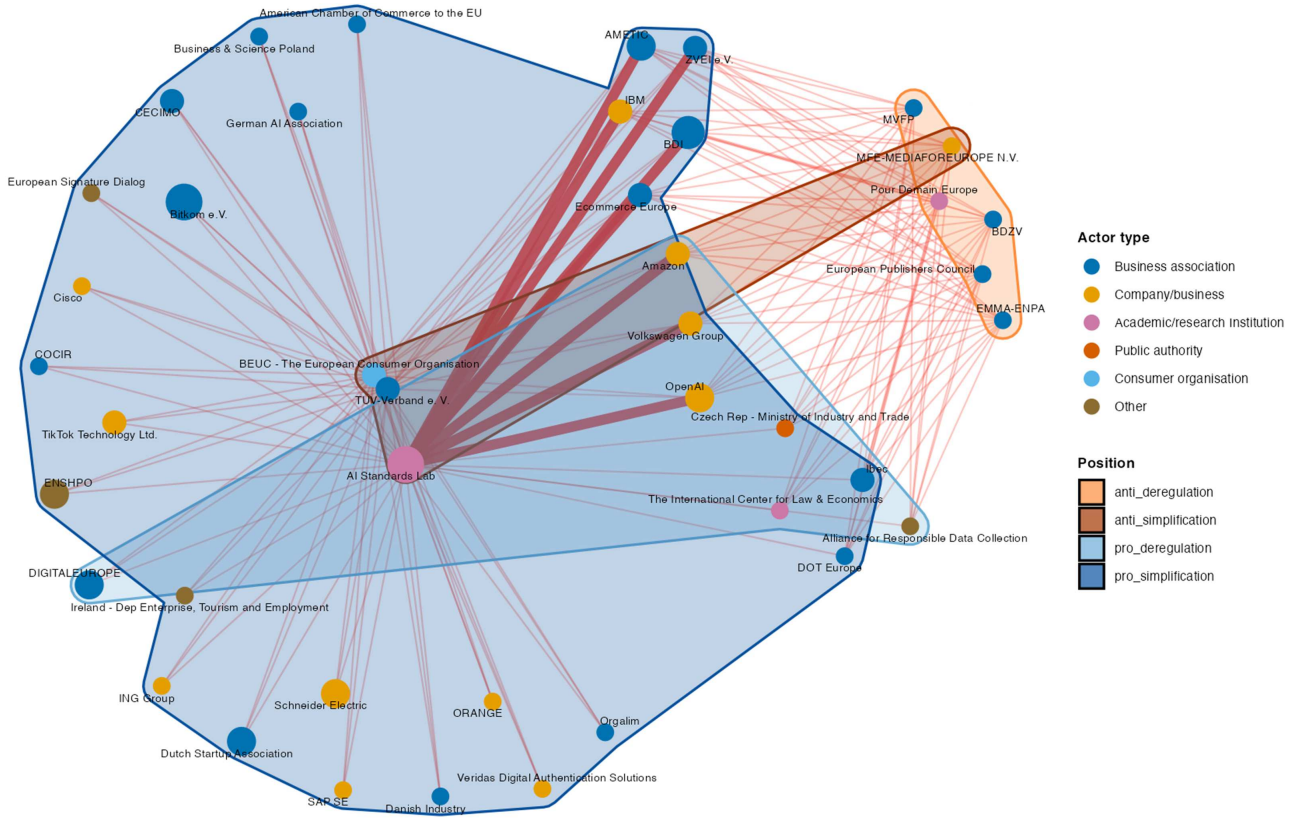
For the conflict network, the visualization in Figure 4 is an aggregate across all regulatory tools; it shows an edge only when one actor is pro and the other is anti for the same regulatory tool. The conflict network is lopsided. Because each actor carries a single stance per tool, the 80 coded statements condense into 57 actor-regulatory tool stances, of which 4 are neutral. Each of the 167 edges in the network records a direct clash over a single instrument rather than a general difference in outlook. For example, on AI standards, ING Group recommended the EC "postpone high-risk AI obligations until 12 months after harmonised standards are published," while BEUC alleged that "[h]armonised [s]tandards are important tools for operationalizing compliance, but not a precondition for legal obligations as they are voluntary tools." TÜV-Verband, a business association, took the same side as BEUC on this tool.

The conflict is concentrated rather than diffuse. It occurs between a large, internally cohesive pro-simplification bloc and a small group of persistent objectors, with one research institution bearing a disproportionate share of opposition. The network's modularity is 0.276, with two primarily business-driven communities, suggesting the network should be interpreted through this hub structure rather than as two opposing camps. For instance, because conflict ties can only run between the pro-stances and anti-stances, the three actors opposing pro-stances within AI standards each clash with all 28 pro-stance actors, while pro-stance actors clash only with the 3 actors opposing them. The opposition high scores therefore record how heavily outnumbered they are, not how influential their arguments are.

The composition of the discourse in the conflict network confirms the same pattern seen in the congruence network. In the conflict network, 11 of 12 companies and 16 of 21 business associations are predominantly pro-simplification, while their opponents are, again, not NGOs or civil society groups but the same industry-heavy set of actors, including publishers, conformity-assessment bodies, and research institutions. The conflict is therefore predominantly one between industries, turning on who benefits from regulation and who bears its costs.

Concretely, the network in Figure 4 shows a unified connected component organized around a single actor: AI Standards Lab. A research institution, it has the highest weighted degree of 41 and the highest betweenness centrality of 0.347, making it the

Figure 4
Discourse network analysis – Conflict network for all regulatory tools



most conflict-prone actor in the dataset on both metrics. In other words, it maintains positions directly opposing most of the industry bloc across multiple tools simultaneously. Behind it, BEUC and TÜVVerband are tied at a weighted degree of 28, with 6 other actors at 13.

AI Standards Lab stands out for its broad opposition rather than its intensity. It is the only entity to oppose multiple regulatory tools, objecting to both AI standards and the GPAI CoP, in line with its high weighted degree and betweenness centrality scores. All other opponents focus on a single issue. BEUC and TÜV-Verband oppose only AI standards, while MFE-Media for Europe (publisher company) and Pour Demain Europe (research institution) oppose only the GPAI CoP. The industry bloc, meanwhile, adopts positions on both instruments, with eight members participating in both. This fragmentation indicates that opposition to the simplification is not only smaller but also divided by regulatory tool. For more details, see Appendix 6, conflict DNA figures for each regulatory tool.

Together, the two networks appear saturated rather than selective. The dominance of 452 congruence edges over 167 conflict edges highlights higher congruence and lower conflict. Furthermore, the networks show internal consistency: no actor advocates pro-simplification on one regulatory tool while opposing it on another. For further insights, see the interactive network graph in Appendix 6.4, which allows navigation between congruence and conflict per regulatory tool and position stance. A summary of the results is shown below: Table 6 for position and regulatory tool; Table 7 for regulatory position and actor type; and Table 8 for argument types and regulatory tools.

Overall, the results highlight the differences behind actors' ideas around regulatory simplification in relation to the Digital Omnibus on AI. However, the aggregated results cannot fully explain how actors aimed to influence the implementation of AI regulatory tools through their feedback. Thus, the three subsections that follow examine each regulatory tool, combining actor type, position, and argument type. They are deliberately asymmetric in length because the tools attracted radically unequal attention.

3.2. Findings

3.2.1 AI Regulatory Sandboxes

AI regulatory sandboxes aim to enable regulatory testing and streamline compliance. They are seen as a "controlled framework" set up to enable providers to develop, train, validate, and test innovative AI systems (for a formal definition, see Article 3(55) of the AI Act). In other words, they serve as a "testing ground" balancing support for innovation with regulatory measures [21]. From the beginning, the goal of creating regulatory sandboxes was to encourage innovation, improve legal certainty, and promote regulatory learning, with an eye toward future adaptations of the legal framework (see AI Act, Recital (139)).

The findings suggest that this tool was scarcely discussed. Still, the feedback that did address it favored simplification. For example, TikTok argued under a legal certainty argument that "[t]he Digital Omnibus should specify that participating in a successful AI sandbox should lead to a presumption of conformity." Similarly, but on technical feasibility grounds, ENSHPO advocated using sandboxes as a safe harbor for SMEs. Thus, even if not a priority for the actors involved in the consultation, the tool is nevertheless viewed positively when it eases AI Act compliance or offers participants legal certainty.

3.2.2 AI Standards

AI standards aim to support technical compliance (see AI Act, Recital (121)), while the AI Act establishes core requirements based on public interests or to address a product's risk; standards are intended to specify the technical means needed to meet regulatory objectives [5]. In the EU, standards from European standardization organizations are intended to provide technical guidance on requirements such as accuracy, robustness, and cybersecurity, so that if an organization adheres to them, it is presumed to be in conformity with the AI Act and eligible for CE marking, enabling subsequent commercialization within the single market.

The findings suggest that AI standards are the most-discussed tool (52 snippets). Overall, 40 snippets relate to pro-simplification, 6 to anti-simplification, 3 to neutral, and 3 to pro-deregulation. In terms of argument type, *technical feasibility* was the primary argument. For example, IBM argued for "[d]elaying the applicability of essential requirements of the EU AI Act by 12 months after the relevant standards are published. It is not realistic to ask businesses to put in place compliance processes when the necessary standards may not be available before the end of 2026." In other instances, *competitiveness* and *industry self-regulation* were behind position stances. For example, OpenAI argued under a *competitiveness* argument for "[f]ive pragmatic pillars for simplification [...] aligning CEN- CENELEC AI standards with existing ISO and

Table 6
Position and regulatory tool

Regulatory tool	Position	N snippets
AI sandbox	Pro-simplification	3
AI standards	Pro-simplification	40
AI standards	Anti-simplification	6
AI standards	Pro-deregulation	3
AI standards	Neutral	3
GPAI CoP	Pro-simplification	9
GPAI CoP	Pro-deregulation	6
GPAI CoP	Anti-deregulation	5
GPAI CoP	Anti-simplification	3
GPAI CoP	Neutral	2

Table 7
Regulatory position and actor type

Actor type	Regulatory position	N Snippets
Academic/research institution	Anti-simplification	4
Academic/research institution	Anti-deregulation	1
Academic/research institution	Pro-deregulation	1
Academic/research institution	Pro-simplification	1
Business association	Pro-simplification	29
Business association	Anti-deregulation	4
Business association	Pro-deregulation	4
Business association	Anti-simplification	1
Business association	Neutral	1
Company/business	Pro-simplification	16
Company/business	Pro-deregulation	3
Company/business	Anti-simplification	1
Consumer organization	Anti-simplification	2
Nongovernmental organization (NGO)	Neutral	4
Nongovernmental organization (NGO)	Anti-simplification	1
Other	Pro-simplification	5
Other	Pro-deregulation	1
Public authority	Pro-simplification	1

Table 8
Argument types and regulatory tools

Regulatory tool	Argument type	N snippets
AI sandbox	Technical feasibility	2
AI sandbox	Legal certainty	1
AI standards	Technical feasibility	26
AI standards	Regulatory coherence	9
AI standards	Legal certainty	6
AI standards	Industry self-regulation	3
AI standards	Rights protection	3
AI standards	Competitiveness	2
AI standards	Governance	3
GPAI CoP	Rights protection	7
GPAI CoP	Legal certainty	5
GPAI CoP	Regulatory coherence	5
GPAI CoP	Competitiveness	4
GPAI CoP	Technical feasibility	3
GPAI CoP	Governance	1

NIST frameworks [...] the EU can make its digital rulebook more agile and innovation-friendly." Meanwhile, the business association DIGITALEUROPE expressed a pro-deregulation stance, under an *industry self-regulation* argument, advocating for "allowing standards and other industry initiatives to evolve alongside technologies and market demand."

The actor types of academic/research institutions (e.g., AI Standards Lab), consumer organizations (BEUC), and even business associations (e.g., TÜV-Verband) demonstrated an anti-simplification stance, particularly criticizing calls for delays based on an unavailability of standards (in other words, opposing the *technical feasibility* argument). For example, TÜV-Verband, under a *legal certainty* argument, stated "[w]e reject extensive postponement," that "the expected delay in the availability of harmonised standards is by itself not sufficient reason that would justify a postponement" and that "[t]he agreed deadlines, as published in the EU's Official Journal, ensure that both companies and designated authorities have legal and planning security." Similarly, AI Standards Lab, under a *governance* argument, advocated for an effort to determine if the AI Office would need extra funding resources "to use the instruments at its disposal whenever the European Standards system fails."

Overall, there is strong industry consensus supporting the simplification of AI standards; however, this position primarily aims to delay compliance until AI standards are established (26 snippets), relying mainly on *technical feasibility* arguments. Meanwhile, other actors oppose this approach with an anti-simplification stance, arguing that standards delays should not justify delays in compliance with AI Act obligations and asserting that there should be no delays, taking mainly a *rights protection* argument.

3.2.3 General-Purpose AI Code of Practice

GPAI CoP is described as a "central tool for proper compliance," offering guidance to GPAI model providers seeking clarity on the requirements outlined in the AI Act (see Recital (117)). For example, the CoP intends to guide compliance with regulatory requirements such as transparency, copyright, safety, and security [22]. Thus, although the CoP is based on voluntary adherence, demonstrating compliance with its guidance is expected to help with compliance documentation and be considered by authorities when assessing the lawfulness of GPAI models.

The study suggests that this is the most divisive regulatory tool. The results on coded snippets revealed 9 pro-simplification, 6 pro-deregulation, 5 anti-deregulation, and 3 anti-simplification positions. These positions are spread across six of the seven actor types; only consumer organizations are absent. Thus, for this regulatory tool, there are no clear coalitions or conflicts related to actor types. Similarly, there is variation in argument types.

Pro-simplification presented *regulatory coherence, technical feasibility*, and *competitiveness* argument types. For instance, the business association DOT expressed a pro-simplification stance, in line with a *regulatory coherence* argument, stating that "[t]he forthcoming CoP under Article 50 [transparency obligations for generative AI systems] should be consistent with global standards and remain flexible on watermarking/labelling." Meanwhile, Amazon, citing *technical feasibility*, stated that the Code of Practice on Article 50 would "not be completed before mid-2026" and that compliance with this obligation should therefore be delayed. On another front, IBM argued, under a *competitiveness* argument, for "simplify the AI Act and its related General Purpose AI Code of Practice" and suggested an imperative by noting that "at a time when Europe is facing significant challenges to preserve its competitiveness."

Pro-deregulation positions were predominantly based on the *competitiveness* argument. For example, ICLE (academic/research institution) argued pro-deregulation, under an *EU competitiveness* argument, that the "AI Act implementation efforts to date, including drafting of the GPAI Code of Practice, have not treated AI's potential to improve European economic welfare with sufficient seriousness. Compliance with the AI Act may divert significant resources from startups and stifle their development."

Anti-deregulation was presented under a *legal certainty* argument, coupled with other types of arguments. For instance, the European Publishers Council (business association) stated, pairing with *rights protection* argument type, that "[t]he Commission should revise the GPAI Code of Practice... to ensure effective enforcement of Article 53 [Obligations for providers of GPAI models], strengthen legal certainty, and align with the EU's broader digital framework, while properly addressing the concerns of publishers that were largely overlooked." Meanwhile, Pour Demain Europe (academic/research institution) stated, pairing a *competitiveness* argument type, that "[s]implification must not lead to deregulation [...] The GPAI Code of Practice has received wide industry endorsement. GPAI rules are essential: they push obligations up the value chain, provide legal certainty, foster consumer trust, and support EU technological sovereignty."

Anti-simplification presented *rights protection* arguments. For example, MFE-Media for Europe N.V. (company/business) stated that "[t]he CoP does not allow for the proper application of the EU copyright framework [...] We are concerned that any simplification would further weaken its effectiveness and lead to a watering down of EU copyright law and media pluralism. It is crucial to ensure robust implementation." Similarly, Civil Liberties Union for Europe (NGO) stated that "[i]t is crucial that there is no lag in the enforcement of Art. 50 transparency requirements [covered by the CoP on transparent generative AI], and that there is no derogation that could allow deployers to skirt them."

Overall, the GPAI CoP is the most debated regulatory instrument, with viewpoints ranging from favoring simplification to supporting deregulation, to opposing deregulation and simplification. Nevertheless, the general consensus persists: technology firms tend to favor lighter regulation, viewing CoP as more adaptable and conducive to innovation, whereas media publishers and civil society advocate for regulation to safeguard rights. Consequently, the main arguments cited by actors center on the protection of rights, legal certainty, and competitiveness.

4. Discussion

The analysis indicates that when actors refer to "regulatory simplification" (RQ1), the focus is not on simplification or deregulation but on delaying processes. The main argument behind it is technical feasibility; thus, when feasibility is in question, "simplification" effectively becomes a placeholder for "not yet regulation."

The study reveals varied results for each regulatory tool (RQ2). AI standards predominantly favor a pro-simplification stance, with 40 out of 52 snippets pro-simplification and technical feasibility as the leading argument at 26, mainly because business actors see a lack of harmonized standards as a reason for "simplification," as in delaying regulatory timelines. The GPAI CoP emerges as the most debated tool, with perspectives crossing actor types rather than aligning with them; both business associations and research institutions are present on both sides of the debate. Opposition to simplifying the GPAI CoP was driven less by civil society than by a divided industry, consistent with the counter-coalition described in section 3.1.5, and was primarily centered on *rights protection*. AI regulatory sandboxes did not appear to be a priority in feedback, though actors viewed the tool favorably when it provided clearer compliance benefits to participants.

The DNA suggests agreement is broad rather than concentrated, while disagreement is concentrated. The strongest possible tie in the congruence network connects two actors who share the same position on two of the three tools, and 29 actor pairs achieve this (e.g., AMETIC and Amazon, both pro-simplification on AI standards and the GPAI Code of Practice). Eight actors (OpenAI, Amazon, IBM, Volkswagen Group, AMETIC, BDI, ZVEI, and Ecommerce Europe) have the highest weighted degree of 39, agreeing with every other pro-simplification actor on every tool on which they took a position. In the conflict network, by contrast, the same eight actors clash on two tools at once, with AI Standards Lab opposed to each of them on both AI standards and the GPAI Code of Practice. Thus, a single research institution bore the brunt of the discourse's most intense opposition, facing off against the very eight actors who form the pro-simplification bloc's most cohesive coalition.

One type of argument deserves a closer look. Legal certainty is the only argument type in the corpus used across pro-simplification, pro-deregulation, neutral, and anti-simplification positions (Table 4). Pro-simplification actors use it to argue that postponing obligations until harmonized standards exist would reduce compliance uncertainty; anti-simplification actors use it to argue the opposite, that a deadline, once agreed, makes planning possible, and reopening it creates uncertainty rather than curing it (see TÜV-Verband). In other words, legal certainty is flexible rather than fixed; actors can reference it in either direction based on what they need to make predictable. This aligns with previous research, which argues that certainty and uncertainty are used selectively, depending on an actor's perceived expertise, due to asymmetric costs of legal uncertainty [22]. The data in this study support that argument.

Overall, the discourse contains elements consistent with the "better regulation" agenda [14]. For instance, regulatory coherence is the second most frequent argument type in the dataset (14 of 80 snippets), and all instances are advanced by actors with pro-stances (13 pro-simplification and 1 pro-deregulation). Mainly by arguments concerning the reuse of compliance work across instruments with overlapping requirements.

However, coherence is not the dominant argument. Technical feasibility accounts for 31 of 80 snippets, making it the largest single argument type. Furthermore, it is used exclusively by pro-simplification actors and concentrates on AI standards (26 of 31 stances). These arguments are mainly about deferral; for instance, actors requesting extended implementation timelines, deferred application of fines, or suspension of obligations until harmonized standards become available. The most frequent argument for simplification is therefore a request for postponement rather than for a change in regulatory content.

The distribution of argument types suggests the two sides debate using different terms rather than directly challenging each other's claims. For instance, proponents of simplification do not raise rights-based arguments, whereas all 10 *rights protection* arguments come from opponents of the pro-stance. Meanwhile, the finding of technical feasibility as the primary argument type highlights that stating that a requirement cannot be met currently is different from asserting that it should not exist. The former does not need justification rooted in values or fairness. This aligns with Majone's view that even technical and objective policy analysis depends on value judgments [23]. Therefore, the simplification agenda appears less focused on genuinely reforming the AI Act's regulatory content and more of a discursive device used primarily to achieve regulatory procrastination.

4.1. Comparison to the Digital Omnibus on AI regulation

The study primarily analyzed initial actors' feedback to the early call for evidence consultation; this section compares the findings with those from the Digital Omnibus on AI Regulation (EU) 2026/1744. The comparison aims to assess the alignment between stakeholder positions and legislative outcomes, rather than influence. Mainly because submissions reflect stakeholders' wishes rather than their actual accomplishments, and because the regulation was influenced by economic and geopolitical pressures, the Commission's preferences, and the Council and Parliament's negotiations in trilogue, which this study does not take into consideration.

Regarding AI regulatory sandboxes, consistent with the study's findings, this tool is affected by general regulatory delays: the Digital Omnibus on AI postpones the deadline for national sandboxes to August 2, 2027. Yet while the study found sandboxes were not prioritized by actors, the Digital Omnibus on AI shows a clear prioritization by EU institutions, expanding the tool via a new EU-level sandbox to be set up and operated by the AI Office.

Regarding AI standards, the work identified a significant pro-simplification alliance, primarily arguing that technical feasibility justifies delays (e.g., industry prefers postponements until standards are established). This aligns closely with Article 113 of the Digital Omnibus on AI, which links obligations for high-risk AI systems to the existence of harmonized standards, effectively extending implementation to December 2027 and August 2028. This approach reflects the industry's framing of "simplification" as a form of delay.

Finally, the study found a lack of consensus among actors on the "regulatory simplification" path for the GPAI CoP. In the findings, business actors preferred industry self-regulation while media publishers advocated for legal certainty and rights protection. The Digital Omnibus on AI instead removes the Commission's power to adopt implementing acts that would make the CoP legally binding and provides the AI Office with almost exclusive competence in the oversight of GPAI models. Thus, in this regulatory tool, there is no alignment with specific actors, yet there is alignment with deregulation and the consolidation of central oversight.

5. Conclusion

The Brussels approach to regulation seems to be shifting; however, the findings suggest the "regulatory simplification" agenda has little substance beyond asking for a delay in applying the AI Act, justified by delays in developing AI standards. Other tools, like the GPAI CoP, leaned more toward simplification or deregulation, though contested and lacking consensus, while AI regulatory sandboxes were viewed positively but treated as a lower priority. These findings partly align with the Digital Omnibus on AI regulation, which ties the rollout of high-risk AI provisions to the availability of standards, expands AI sandboxes to the EU level, and leans further on soft law by keeping the GPAI CoP as guidance, rather than as mandatory.

This study also shows that business associations and companies cluster strongly on the side of deregulation, while the counter-coalition is led by industry actors: publishers, a conformity-assessment body, and two research institutions. In other words, it suggests that opposition comes from those whose commercial position depends on the rules being enforced, not from civil society. That said, the absence of NGOs from the opposition is a product of the aggregation method, not evidence that NGOs didn't oppose the agenda.

Furthermore, the findings suggest that regulatory deferral is not a neutral instrument. A delay shifts risk; it frees providers from near-term compliance costs while leaving the people affected by AI systems exposed for as long as the delay lasts, and it does this without ever requiring a public justification, because a timeline extension is presented as a technical fix rather than a normative choice. In other words, where deregulation must be argued for and defended, procrastination need only be administered. Thus, there's one important lesson here: compliance depends less on how strict the rules are than on whether their start date can be reopened, and the AI Act has just shown that it can.

Three key practical implications emerge. For the Commission and the AI Office, accepting deferrals under "technical feasibility" implies that any future extension of regulatory

timelines should specify a clear improvement goal and include a review point. For Member States, delaying the national sandbox deadline while introducing a new EU-level sandbox managed by the AI Office raises capacity concerns, as the least prioritized by stakeholders is being expanded, and its success depends on whether the EU and national authorities have sufficient resources to manage them. For jurisdictions adopting legislation based on the AI Act, there is a risk of inheriting not only its text but also its flexibility to reopen regulatory timelines under competitiveness pressures. Given these implications, expansions of the study could focus on understanding what various actors mean by regulatory simplification, for instance, through the argument types identified in this study, in the context of the Digital Omnibus amendments to EU rules on data and cybersecurity.

Finally, although actors broadly agree on AI standards, the GPAI CoP produces a wide range of opinions, a reminder that, despite all the talk of simplification, AI systems remain inherently complex, and the real challenge is to simplify regulation without ignoring that complexity. This matters even more because the push for simplification has so far focused mainly on delays and competitiveness, leaving rights protection on the sidelines. Thus, there's a case for trying a different approach, such as experimenting with regulatory tools like regulatory sandboxes [21], though their capacity and effective use will determine their success. Otherwise, the core pillars of the von der Leyen Commission need to be written as *simplification, delay, and standing by*.

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Ethical Statement

This study does not contain any studies with human or animal subjects performed by the author.

Conflicts of Interest

The author declares that she has no conflicts of interest to this work.

Data Availability Statement

The data that support the findings of this study are openly available at https://github.com/anapaulagonzaleztorres/AI_Act_Digital_Omnibus_on_AI_Simplification/blob/main/data/eu_feedback_coded.csv

Author Contribution Statement

Ana Paula Gonzalez Torres: Conceptualization, Methodology, Software, Validation, Formal analysis, Investigation, Resources, Data curation, Writing – original draft, Writing – review & editing, Visualization.

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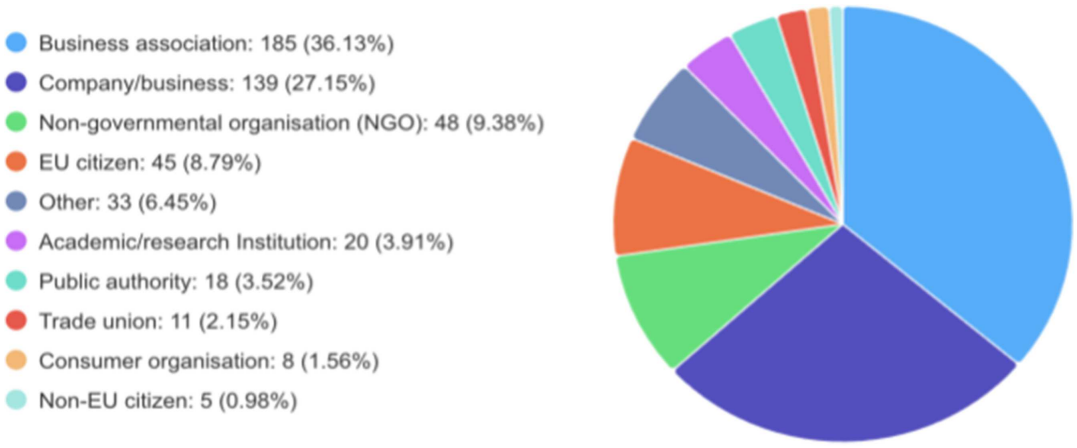
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Appendixes

Appendix 1. Replication material

GitHub repository for dataset, code, audit trail and reliability checks.

Appendix 2. Actors' composition – Feedback to the call for evidence: Simplification – digital package and omnibus



Source: European Commission.

Appendix 3. Individual actors list

Actor type	Name in visualizations	Full name
Academic/research institution	AI Standards Lab	AI Standards Lab
Academic/research institution	Pour Demain Europe	Pour Demain Europe
Academic/research institution	The International Center for Law & Economics	The International Center for Law & Economics
Business association	AMETIC	AMETIC
Business association	American Chamber of Commerce to the EU	American Chamber of Commerce to the EU
Business association	Bitkom e.V.	Bitkom e.V.
Business association	BDI	Bundesverband der Deutschen Industrie (BDI)/Federation of German Industries
Business association	German AI Association	Bundesverband der Unternehmen der Künstlichen Intelligenz in Deutschland e.V.
Business association	Business & Science Poland	Business & Science Poland
Business association	CECIMO	European Association of Manufacturing Technologies
Business association	COCIR	European Coordination Committee of the Radiological, Electromedical and healthcare IT Industry
Business association	DIGITALEUROPE	DIGITALEUROPE
Business association	DOT Europe	DOT Europe

(*Continued*)

(*Continued*)

Actor type	Name in visualizations	Full name
Business association	Danish Industry	Danish Industry
Business association	Dutch Startup Association	Dutch Startup Association
Business association	EMMA-ENPA	European Magazine Media Association European Newspaper Publishers' Association
Business association	Ecommerce Europe	Ecommerce Europe
Business association	European Publishers Council	European Publishers Council
Business association	BDZV	German Newspaper Publishers and Digital Publishers Association
Business association	Ibec	Ibec
Business association	MVFP	Medienverband der freien Presse e.V.
Business association	Orgalim – Europe's Technology Industries	Orgalim – Europe's Technology Industries
Business association	TÜV-Verband e. V.	Technischer Überwachungsverein
Business association	ZVEI e.V.	Zentralverband Elektrotechnik- und Elektroindustrie)
Company/business	Amazon	Amazon
Company/business	Cisco	Cisco
Company/business	IBM	IBM
Company/business	ING Group	ING Group
Company/business	MFEMEDIAFOREUROPE N.V.	MFEMEDIAFOREUROPE N.V.
Company/business	ORANGE	ORANGE
Company/business	OpenAI	OpenAI
Company/business	SAP SE	SAP SE
Company/business	Schneider Electric	Schneider Electric
Company/Business	TikTok Technology Ltd.	TikTok Technology Ltd.
Company/Business	Veridas Digital Authentication Solutions	Veridas Digital Authentication Solutions
Company/Business	Volkswagen Group	Volkswagen Group
Consumer organization	BEUC – The European Consumer Organisation	The European Consumer Organisation
Nongovernmental organization (NGO)	AFNOR	Association française de normalization
Nongovernmental organization (NGO)	Civil Liberties Union for Europe	Civil Liberties Union for Europe
Nongovernmental organization (NGO)	Culture Action Europe	Culture Action Europe
Other	Alliance for Responsible Data Collection	Alliance for Responsible Data Collection
Other	ENSHPO	The European Network of Safety and Health Professional Organizations
Other	European Signature Dialog	European Signature Dialog
Other	Ireland - Dep Enterprise, Tourism and Employment	Ireland - Department of Enterprise, Tourism and Employment
Public authority	Czech Rep - Ministry of Industry and Trade	Ministry of Industry and Trade of the Czech Republic

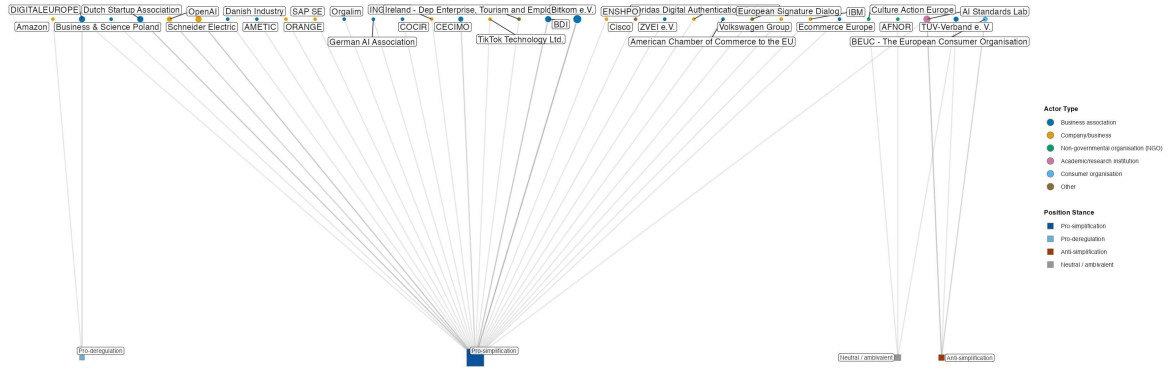
Appendix 4. Actor-position-regulatory tool discourse network analysis

4.1. Actor-Position Network – AI Regulatory Sandbox



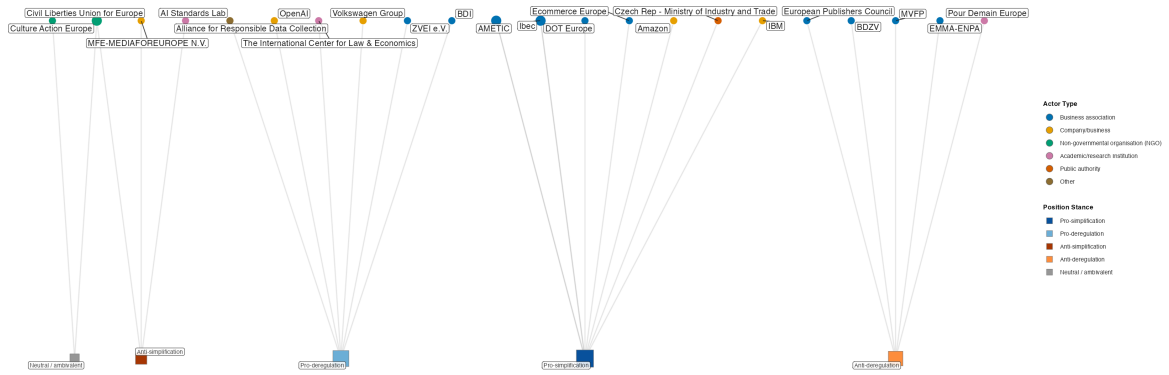
GitHub repository

4.2. Actor-Position Network – AI Standards



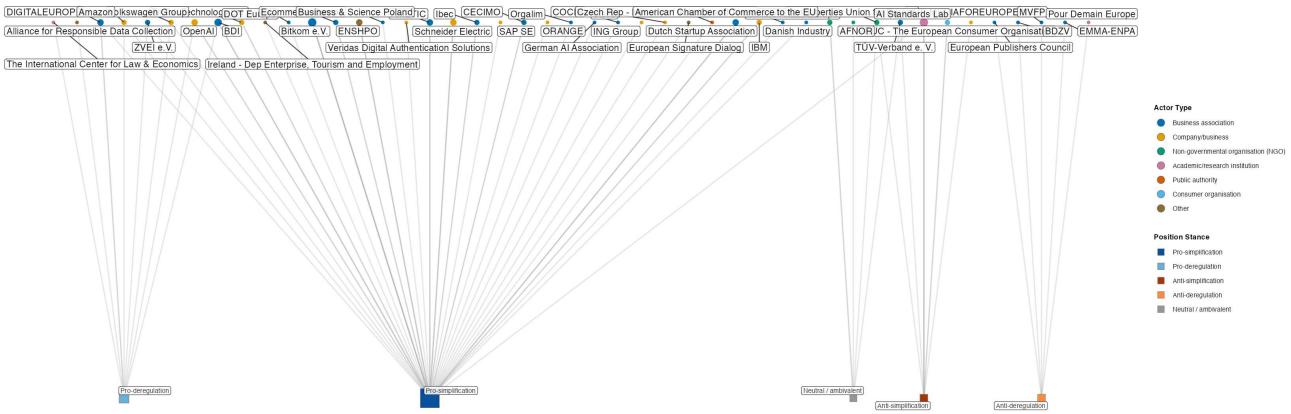
GitHub repository

4.3. Actor-Position Network – GPAI Code of Practice



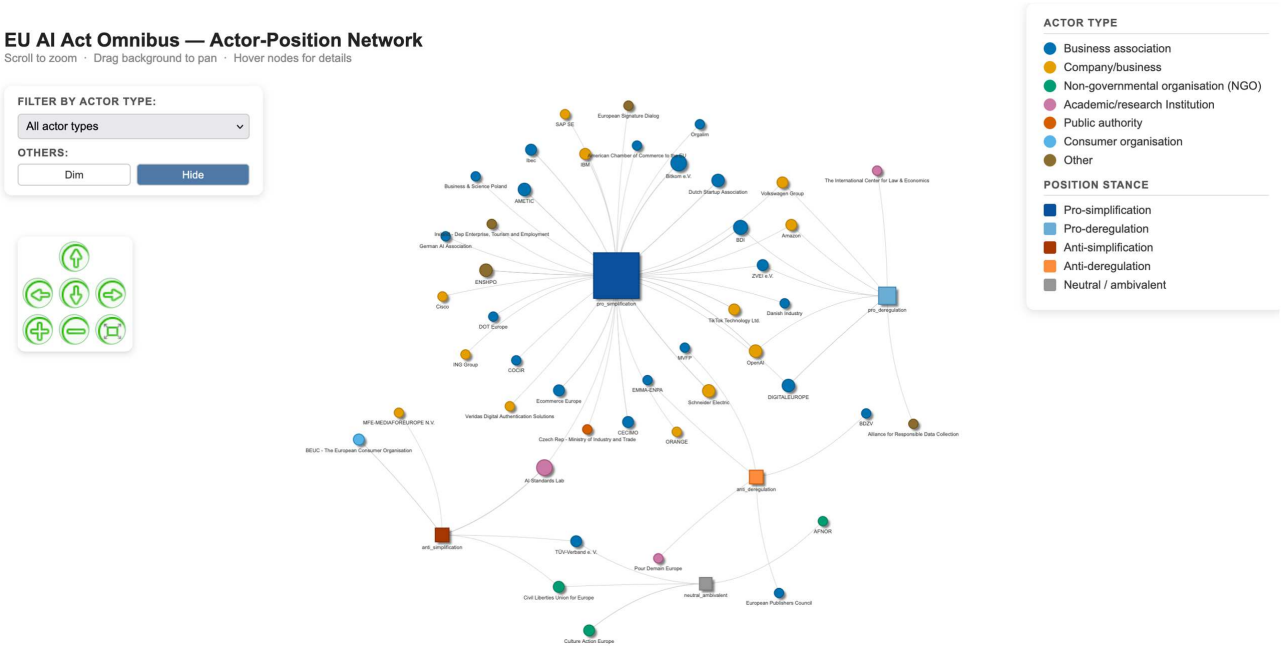
GitHub repository

4.4. Actor-Position Network – All Regulatory Tools



GitHub repository

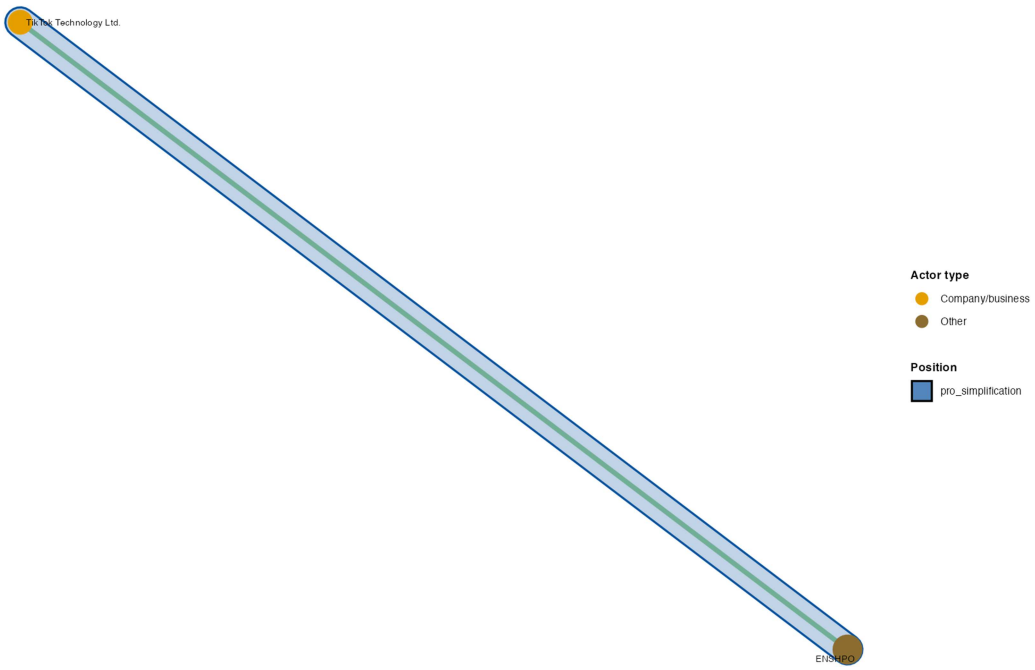
4.5. Interactive EU AI Act Omnibus – Actor-Position Network



GitHub repository

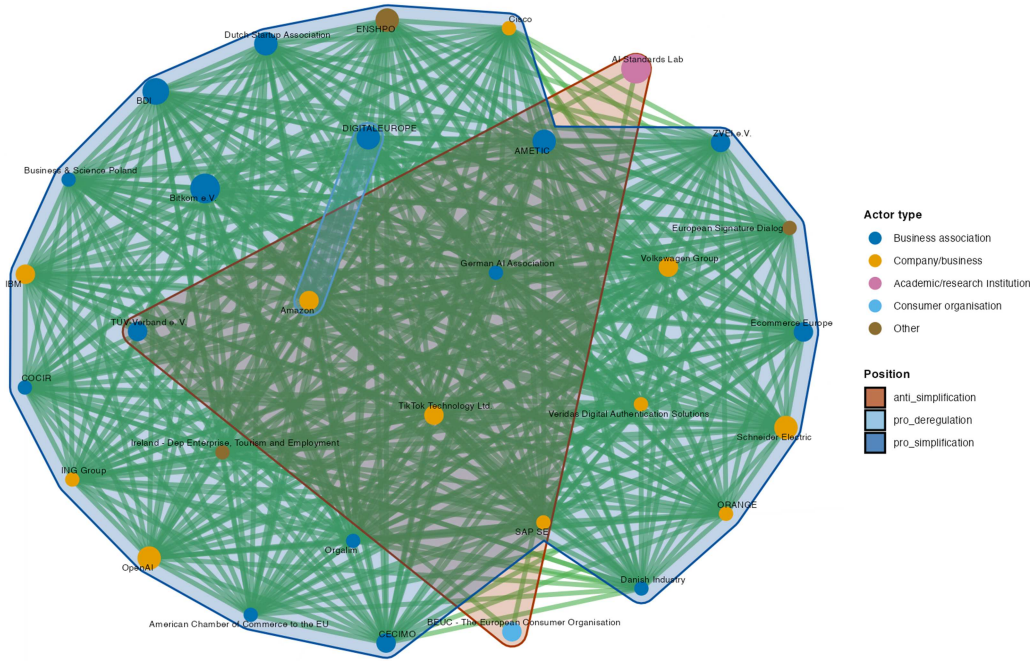
Appendix 5. Congruence – Discourse network analysis per regulatory tools

5.1. Congruence – AI sandbox



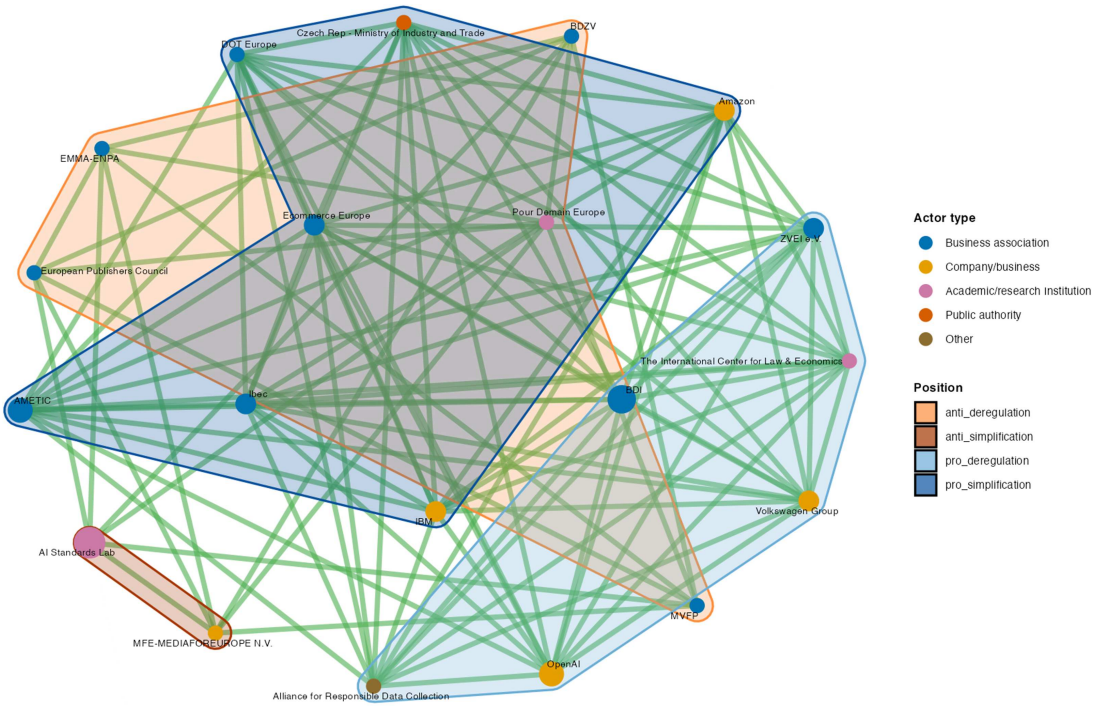
GitHub repository

5.2. Congruence – AI standards



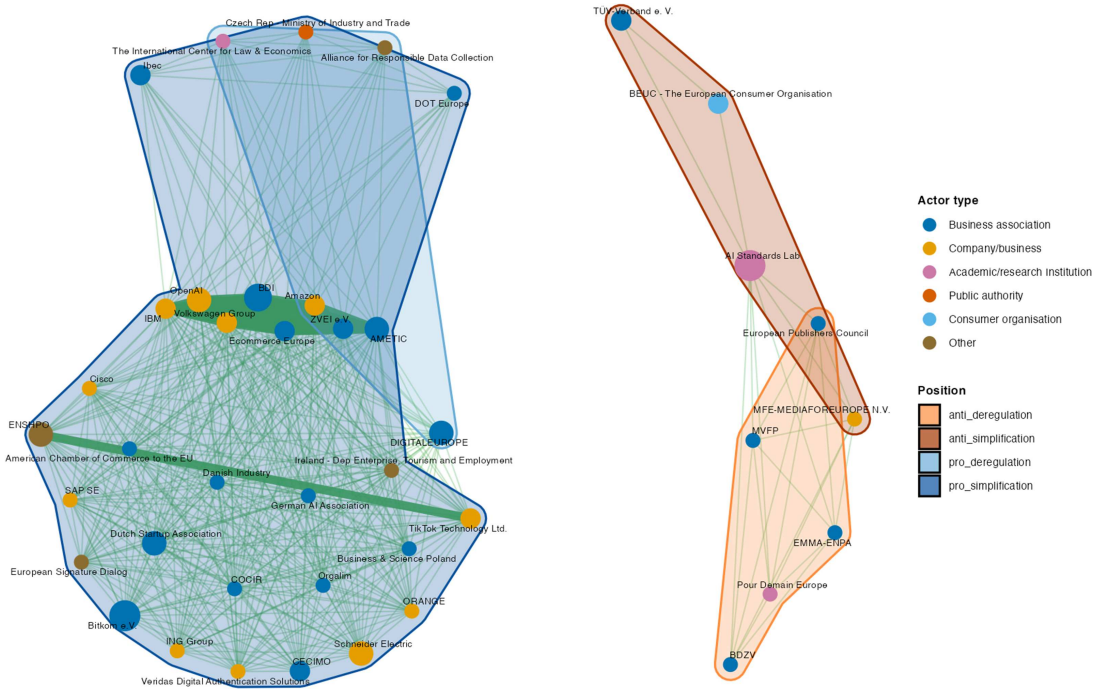
GitHub repository

5.3. Congruence – GPAI CoP



GitHub repository

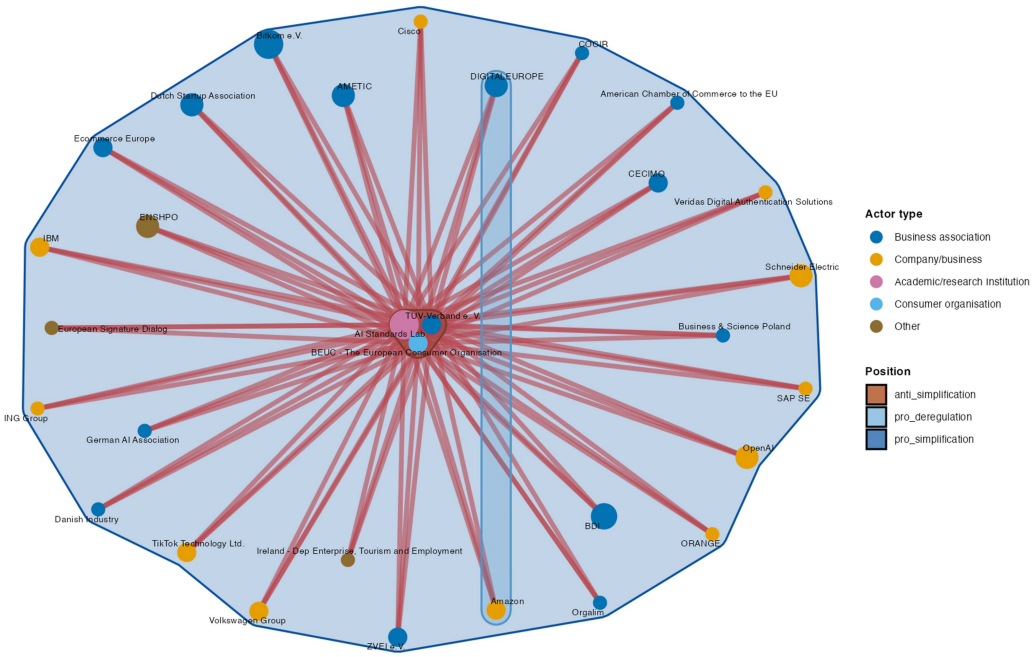
5.4. Congruence network – All regulatory tools



GitHub repository

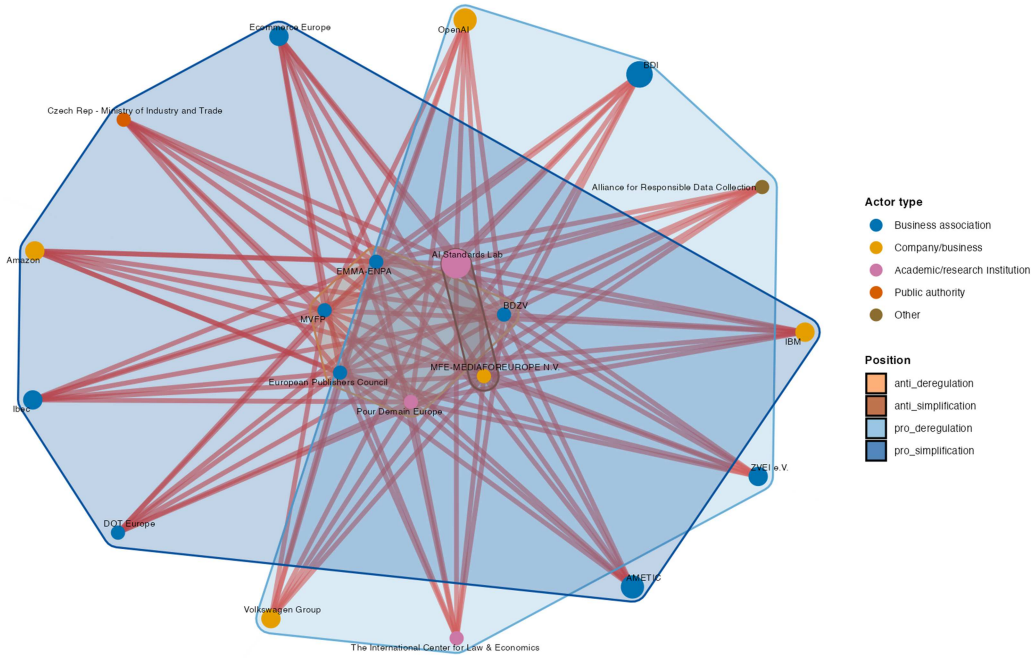
Appendix 6. Conflict – Discourse network analysis per regulatory tools

6.1. Conflict – AI standards



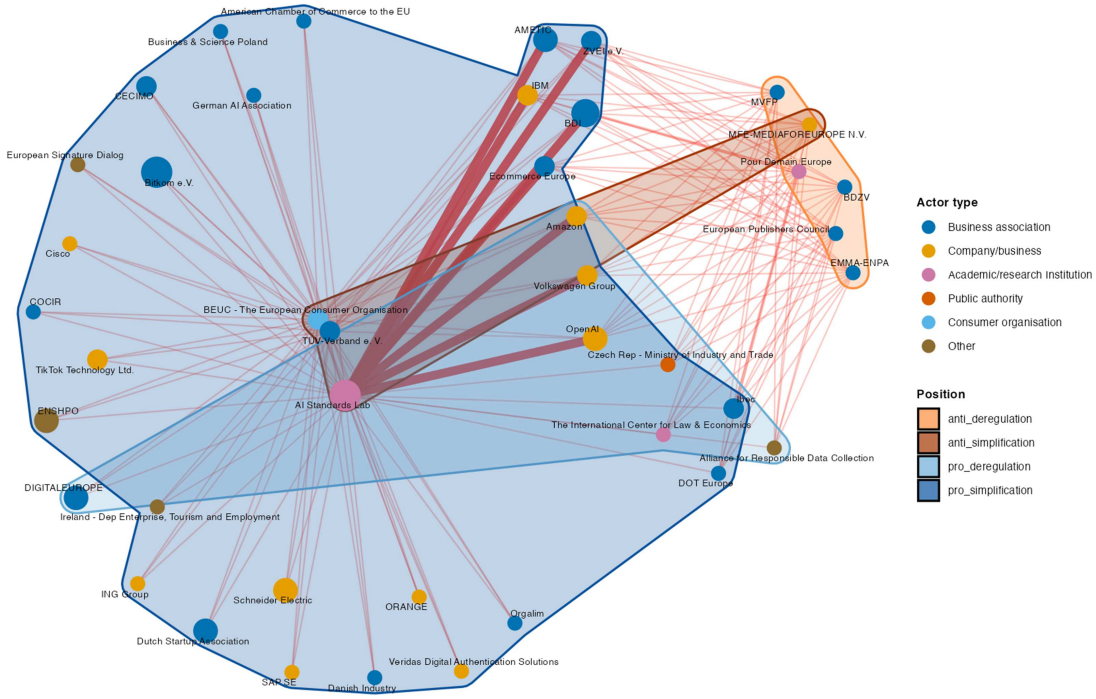
GitHub repository

6.2. Conflict – GPAI CoP



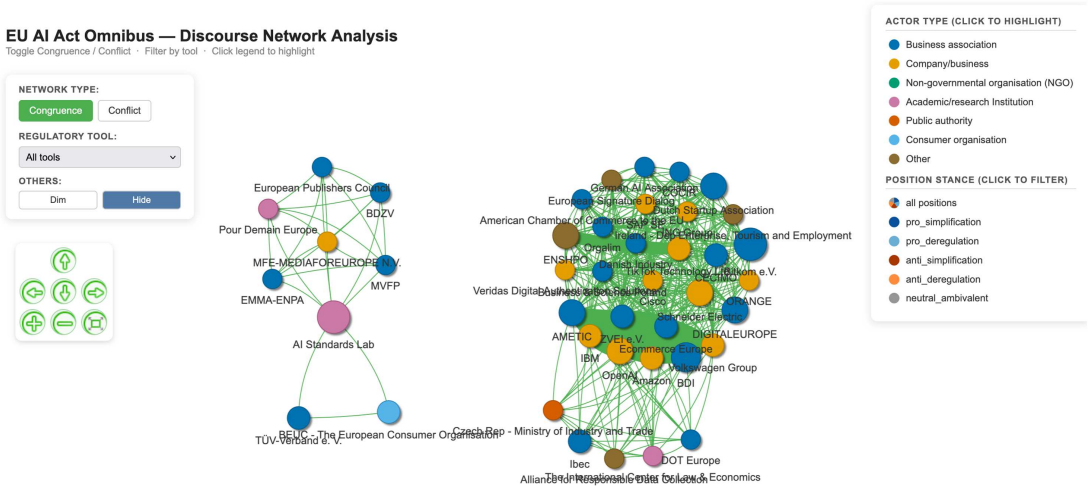
GitHub repository

6.3. Conflict – All regulatory tools



GitHub repository

6.4 Interactive EU AI Act Omnibus – Conflict and Congruence Discourse Network Analysis



GitHub repository

Appendix 7. Coding Protocol and Codebook

AI-assisted coding procedure including the tasks given to the model, the decision rules that accumulated as borderline cases arose, and the codebook of argument types.

7.1 Task and workflow

The coding process was not completed by a single stored prompt. Instead, it involved a supervised, interactive session where, for each snippet, the model was presented with details such as the actor, actor type, regulatory tool, and source paragraph. It then suggested (i) a regulatory stance from five options, (ii) an argument type, and (iii) a one-line rationale, allowing for evaluation of the reasoning rather than just the label. The author reviewed the suggestions, confirmed or corrected them, and only then recorded the code. No coding was added to the dataset without author approval against the source passage. The process was carried out in 17 batches: 16 with 5 snippets each, and a final batch of 9 snippets.

Two design choices were predetermined. The argument types were not set beforehand; instead, the AI model was guided to develop the typology inductively through coding. During this process, nine argument types emerged and were later consolidated into seven by the author, as shown in Table 3. The tool mapping was also fixed. Standards were harmonized and consolidated into a single instrument; the code of practice was linked to the GPAI CoP; and the AI regulatory sandbox was mapped to the AI sandbox.

Each decision was documented in a single reproducible script, with one entry per snippet. This includes the index, any split identifier, the keep-or-delete action, the tool, the position, the argument type, and a note. That script is the audit trail and is published.

7.2 Decision rules for recurring borderline cases

Boundary	Rule applied
Simplification vs deregulation	Whether the actor seeks a different route to the same obligation, or a lesser obligation. Requests that change only the procedure, sequence, or timing by which a requirement is met are simplification; requests that reduce the level of protection or remove a requirement are deregulation. Where a snippet could be read either way, it is coded as simplification and flagged.
Regulatory coherence vs technical feasibility	What the actor wants changed. Where the request is that two regimes be reconciled, it is regulatory coherence; where the request is that a timetable move, it is technical feasibility.
Regulatory coherence vs legal certainty	What is the actor concerned about. Where the concern is duplication or misalignment between instruments, it is regulatory coherence; where it is the actor's own compliance planning or predictability over time, it is legal certainty.

The regulatory coherence versus technical feasibility boundary accounted for 3 of the 6 argument type disagreements in the intra-coder check and 2 of the 8 in the inter-coder check. Across both checks, technical feasibility appears in 11 of the 14 argument type disagreements and regulatory coherence in 7 (see section 3.1.3).

7.3 Author intervention

The corrections are listed in section 3.1.3 and are all documented in the audit trail. As an example, snippet 11 (OpenAI) underwent three corrections simultaneously. The model suggested AI standards, pro-simplification, and regulatory coherence. Meanwhile, the author *also* identified the snippet as related to GPAI CoP and pro-deregulation. Consequently, it was divided into two snippets: 11a (GPAI CoP, pro-deregulation, regulatory coherence), because promoting CoP as a compliance method replaces voluntary compliance with a formal obligation, thus changing the obligation level; and 11b (AI standards, pro-simplification, technical feasibility), because adjusting timing to match standards development modifies the schedule without altering the requirement itself. From then on, a rule was established that if a snippet clearly addressed two tools, the model should flag it and suggest splitting. This resulted in seven snippets being split.

7.4 Codebook

Counts are for all 80 coded rows from 45 organizations responding to the Commission's call for evidence (September 16–October 14, 2025). Argument types were coded inductively in two sequential passes. First, the actor's regulatory position, then the logical or rhetorical basis. The criterion was the rhetoric, not the position itself. Thus, the same argument type may appear in opposing regulatory

positions. Initial codes emerged from the first ~40 snippets and were consolidated as the coding proceeded. For instance, "implementation burden" and "missing standards" were merged into the *technical feasibility* argument type. Nine types emerged in the overall coding process and were further consolidated into seven by the author.

Argument type	n (%)	Actor argument
Technical feasibility	31 (38.8%)	. . . the requirement is technically or operationally unworkable as designed; standards do not yet exist, timelines are too short, or compliance would demand structurally impossible steps
Regulatory coherence	14 (17.5%)	. . . the same obligation appears in several instruments with inconsistent wording, thresholds or timelines, and calls for alignment or removal of duplication
Legal certainty	12 (15.0%)	. . . the law is too vague or unpredictable, creating compliance uncertainty, and calls for clearer definitions, explicit timelines or binding guidance
Rights protection	10 (12.5%)	. . . the change would weaken protections for consumers, rightsholders or persons subject to AI systems, invoking fundamental rights, IP, safety or nondiscrimination
Competitiveness	6 (7.5%)	. . . a provision damages competitive position; either EU firms against global competitors, or incumbents against SMEs within the EU market
Governance	4 (5.0%)	. . . the institution lacks the capacity, resources or authority to discharge its mandate, or participation in standard-setting and governance is too narrow
Industry self-regulation	3 (3.8%)	. . . industry-led standards or voluntary frameworks are preferable or sufficient alternatives to mandatory requirements

**Percentages are rounded; therefore, they sum to 100.1%.*

7.5 Three disclosures

Competitiveness merge. Arguments about competitive harm between EU market participants are coded under competitiveness rather than as a separate category. Both variants make the same form of claim, an appeal to competitive position as grounds for changing a rule. The internal variant occurs once in this corpus, too rarely to sustain a separate category. The distinction remains recoverable from the published dataset.

Governance merge. Arguments about improved governance (2) relate, for instance, to capacity or resources for EU institutions, and inclusive governance (2) relates, for instance, to facilitating the participation of civil society in standards development; they are reported jointly as Governance (4) because both relate to changes in regulatory practice as an improvement. The distinction remains recoverable from the published dataset.

Direction is not fixed by category. Where an argument type appeared with a position opposite to its typical direction, it was recorded, not recoded. Besides the case of legal certainty, competitiveness appears in pro-simplification (3), pro-deregulation (2), and anti-deregulation (1) positions, the last of which is an actor arguing that GPAI rules strengthen European competitiveness by pushing obligations up the value chain. Reliability is reported in section 3.1.3.