

Position Paper

Euralarm Position Paper on the EU Digital Omnibus Regulation Proposal on Artificial Intelligence – 17 February 2026

Introduction

Euralarm actively supports the development of forward-looking regulatory frameworks that enable technological progress, foster legal certainty and protect citizens, infrastructure and assets across Europe.

This paper sets out Euralarm’s strategic assessment of the [Digital Omnibus initiative on Artificial Intelligence Regulation](#). Euralarm strongly supports the European Commission’s objective of simplification aimed at enhancing proportionality, reducing fragmentation, reinforcing competitiveness and ensuring coherent implementation of the EU digital acquis — while fully preserving robust standards of data protection and consumer trust.

Drawing on extensive practical experience with EU digital legislation, Euralarm offers targeted recommendations designed to improve workability, coherence and legal clarity across the regulatory framework.

I. Exemption of registration of non-high-risk systems limited to narrow or procedural tasks

Euralarm strongly supports removing the registration requirement for AI systems legitimately excluded from high-risk classification due to their limited, narrow or procedural function.

This adjustment restores proportionality and prevents unnecessary administrative exposure for low-risk operational tools that pose no material threat to fundamental rights or safety.

Euralarm proposal

Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
Art. 1 (6), (14), (32) – AI Act Art. 6(3) & Annex III	Self-assessment for narrow/procedural systems without registration	Strongly support removal of registration requirement	Ensures proportionality and avoids unnecessary administrative burdens for ancillary systems.

II. Clarification on obligations for systems placed on the market before High-Risk obligations apply

Euralarm welcomes the clarification that where at least one unit of a high-risk AI system has been lawfully placed on the market prior to the application of obligations, identical units of the same type and model should not retroactively fall under new requirements unless substantially modified.

Given its significant legal and commercial implications, **this principle should be codified in the operative provisions** Euralarm Position Paper on Digital Omnibus on AI Regulation, 17 February 2026 ©

to ensure full legal certainty.

Euralarm proposal			
Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
<p>New addition to Art. 1 (30) AI Act Art. 111</p>	<p>Not necessary to adapt systems to comply with High Risk obligations based on first unit placed on the market if it has not been substantially modified.</p>	<p>Support and codify in operative text (not only recitals) that one lawful unit exempts the system:</p> <p><i>Article 111:</i> (...) 2. <i>Without prejudice to the application of Article 5, this Regulation shall apply to operators of high-risk AI systems, other than those referred to in paragraph 1, that have been placed on the market or put into service before the date of application of Chapter III, and corresponding obligations referred to in Article 113, only if, as from that date, those systems are subject to significant changes in their designs. In any case, the providers and deployers of high-risk AI systems intended to be used by public authorities shall take the necessary steps to comply with the requirements and obligations laid down in this Regulation by 2 August 2030. Only where, as from that date, those systems are subject to a significant change in their design.</i></p> <p><i>For the purposes of this paragraph, the grace period shall apply to a type and model of a high-risk AI system. Where at least one individual unit of a high-risk AI system of a given type and model has been lawfully placed on the market or put into service before the date referred to in the first subparagraph, other individual units of the same type and model may continue to be placed on the market, made available or put into service on the Union market without being subject to additional obligations, requirements or conformity assessment procedures under this Regulation, provided that the design of the high-risk</i></p>	<p>Prevents retroactive application of high-risk AI obligations to systems lawfully placed on the market, while preserving safeguards by requiring full compliance in the event of any significant change in design.</p>

		<p><i>AI system remains unchanged.</i></p> <p><i>For the application of this paragraph, the decisive factor shall be the date on which the first individual unit of that type and model of high-risk AI system was placed on the market or put into service in the Union for the first time."</i></p>	
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III. Clarification of roles and responsibilities

Euralarm recommends introducing a clearly defined role for “component AI suppliers” and clarifying that integrators — including installers — should not automatically be classified as AI providers.

A precise allocation of responsibilities across the AI value chain is essential to ensure proportional liability, legal certainty and investment confidence.

IV. Proposed delay for High-Risk AI System obligations

Euralarm supports postponing certain high-risk AI obligations until harmonised standards and guidance are available. Compliance in the absence of regulatory clarity risks inefficiency and inconsistent implementation across Member States.

Clear backstop dates and legal certainty regarding the Omnibus adoption timeline are crucial to allow structured and orderly preparation.

Euralarm proposal			
Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
Art. 1 (31) – Amending Art. 113	Delayed entry into force	Support delayed application with clear backstop dates	Enables orderly preparation and avoids compliance gaps due to regulatory uncertainty.

About Euralarm

Euralarm represents the fire safety and security industry, providing leadership and expertise for industry, market, policy makers and standards bodies. Our members make society safer and secure through systems and services for fire detection and extinguishing, intrusion detection, access control, video monitoring, alarm transmission and alarm receiving centres. Founded in 1970, Euralarm represents over 5000 companies within the fire safety and security industry valued at 67 billion Euros. Euralarm members are national associations and individual companies from across Europe.

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Note: The English version of this document is the approved Euralarm reference document.

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