

EUROPEAN COMPLIANCE SUITE
EU AI Act Compliance Evidence Templates

POST-OMNIBUS READINESS CHECKLIST
One page on where you stand against the current EU AI Act timeline: which obligations are in force now, which the Digital Omnibus (Regulation (EU) 2026/1744) moved, and which document in this pack addresses each.

Template reference	ECS-AIA-PRO-CHECKLIST
Version	1.0
Edition	July 2026
Reflects	Regulation (EU) 2024/1689 (AI Act) as amended by Regulation (EU) 2026/1744 (Digital Omnibus on AI, in force 27 July 2026)
Purpose	To let an organisation state, on one page, exactly where it stands against the current timeline
Included with	Every purchase of the EU AI Act Compliance Pack

This checklist reflects the AI Act as amended by the Digital Omnibus (Regulation (EU) 2026/1744) to the best of our knowledge as at the edition date. Dates and obligations may be further amended, and application can turn on your specific systems. This is not legal advice; verify the current position and your own classification with a qualified adviser. The deferral of the high-risk deadline is a deferral, not a repeal — the obligations still arrive.

1. Why this checklist exists

(1) In late 2025 the EU AI Act's implementation was visibly off track, and the European Commission proposed a simplification package — the Digital Omnibus. That package is now law: Regulation (EU) 2026/1744, the Digital Omnibus on AI, entered into force on 27 July 2026, six days before the Act's original headline high-risk deadline. It did not repeal the AI Act or change its architecture; it moved some deadlines, added some obligations, and eased documentation for smaller companies. The effect is that the single date most people were planning around — 2 August 2026 — has split into a set of different dates for different obligations, and reading the old headlines now gives the wrong answer.

(2) The dangerous misreading is to hear “the AI Act was delayed” and stand down. What was delayed is the high-risk regime. What was not delayed is the obligation most likely to touch an ordinary business: the Article 50 transparency duties, which apply on their original 2 August 2026 schedule and carry the enforcement power from the same date. And the Omnibus added new prohibitions that take effect on 2 December 2026. So for many organisations — anyone whose system talks to people, generates content, or could be misused to produce the newly-prohibited material — “later” is not safe; something is due now or very soon. This checklist is how you tell the difference for your own systems.

2. The current timeline

As amended by the Digital Omnibus. The high-risk deferral is real; the transparency and prohibition dates are not deferred.

Date	What applies	Moved by Omnibus?
In force now	Article 5 prohibitions (since Feb 2025); AI literacy (softened, still live); GPAI model obligations; penalty ceilings (€35M/7% and €15M/3%); extraterritorial scope	No — unchanged
2 Aug 2026	Article 50 transparency obligations apply (AI interaction disclosure; AI-content marking) — with enforcement from the same date	No — NOT deferred
2 Dec 2026	Article 50(2) marking for generative systems already on the market before 2 Aug 2026; AND two new Article 5 prohibitions (non-consensual intimate imagery; AI-generated CSAM / “nudification”)	Yes — added / short transition
2 Aug 2027	Member States to establish national AI regulatory sandboxes; Commission sectoral delegated acts for Annex I	Yes — deferred
2 Dec 2027	High-risk obligations for Annex III (stand-alone) systems — risk management, data governance, technical documentation, logging, human oversight, conformity assessment	Yes — deferred from 2 Aug 2026
2 Aug 2028	High-risk obligations for Annex I (embedded) systems	Yes — deferred from 2 Aug 2027

3. Your position — complete, file, and you know where you stand

Work down the rows. Mark each applies / does not apply / uncertain, and note the document that addresses it.

Obligation and when it bites	Applies to us?	Pack document
Do we operate any AI system at all? (start here)		AI System Inventory
Could any system fall under a prohibited practice (incl. the two new ones from 2 Dec 2026)?		Inventory + Risk Assessment
Does any system interact with people, or generate audio/image/video/text? → Article 50 from 2 Aug 2026		Governance Policy + Risk Assessment

Generative system placed on the market before 2 Aug 2026? → Article 50(2) marking by 2 Dec 2026		Risk Assessment
Is any system high-risk (Annex III)? → obligations from 2 Dec 2027		Inventory + Impact + Risk + Oversight
Is any system high-risk embedded (Annex I)? → from 2 Aug 2028		Inventory + Conformity Record
Are we a provider needing conformity assessment (internal control)?		Conformity Assessment Record
Do we rely on third-party AI (models, systems, tools)?		Vendor Due-Diligence
Do we qualify for SME / small mid-cap simplified documentation?		Completion Guide (notes the relief)
Have we assigned oversight and incident-reporting responsibilities?		Oversight + Incident Reporting

4. What this tells you

(3) If you marked the Article 50 or prohibition rows as applying, you have obligations that are in force now or bite in 2026 — “later” is not safe for those systems, and the relevant documents in this pack are the ones to complete first. If your exposure is high-risk only, you have more time (December 2027 or August 2028), but the deferral is not a reprieve from doing the work: the standards and conformity infrastructure the delay was granted for still have to be met, and the documents here are built so you can start now against the deadline rather than late. File this completed checklist; it is your dated, defensible statement of where you stand.

European Compliance Suite

A trading name of EuroGRC OÜ. Reflects the AI Act as amended by Regulation (EU) 2026/1744. Not legal advice; verify the current position before relying on it.