

# Reflections on the international dimensions of the EU Digital Omnibus

## OPENING & MODERATORS



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## Key messages to EU legislators

- 1** Avoid fragmentation between overlapping due diligence obligations, since this would complicate rather than simplify compliance for businesses.
- 2** Ground EU digital governance firmly in international human rights law, as committed to under the UN Global Digital Compact and given the EU's influence as a global standard-setter.
- 3** Welcome privacy signals as useful contribution to global digital governance but clear legal definition needed.
- 4** Maintain the current definition of personal data and avoid expanding lawful bases for AI training in ways that weaken purpose limitation, data minimization, and effective user control.
- 5** Ensure that international human rights law guides cross-border cooperation on cybercrime and avoid reforms that weaken safeguards for international data transfers or increase risk of transnational repression.
- 6** Apply a strict human rights and proportionality approach to any derogations for processing sensitive data in AI development, to prevent discriminatory outcomes.
- 7** Preserve transparency, access, and contestation rights as core accountability tools in AI-related data processing and decision-making.
- 8** Welcome continued mandatory public reporting on whether AI systems are high-risk, while recognizing that stronger practical accountability measures are still needed.
- 9** Safeguard the powers and resources of Article 77 Fundamental Rights Authorities and preserve meaningful access to information for independent oversight.
- 10** Strengthen structured dialogue between Article 77 entities and civil society so each can benefit from the other's expertise and capacities.
- 11** Undertake a full human rights impact assessment of the Digital Omnibus.

The key messages are the result of an online and in person roundtable held on 18 May 2026, gathering over 100 participants including Data Protection Authorities, National Human Rights Institutions, Equality Bodies, Academics, Civil Society and EU Officials.



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