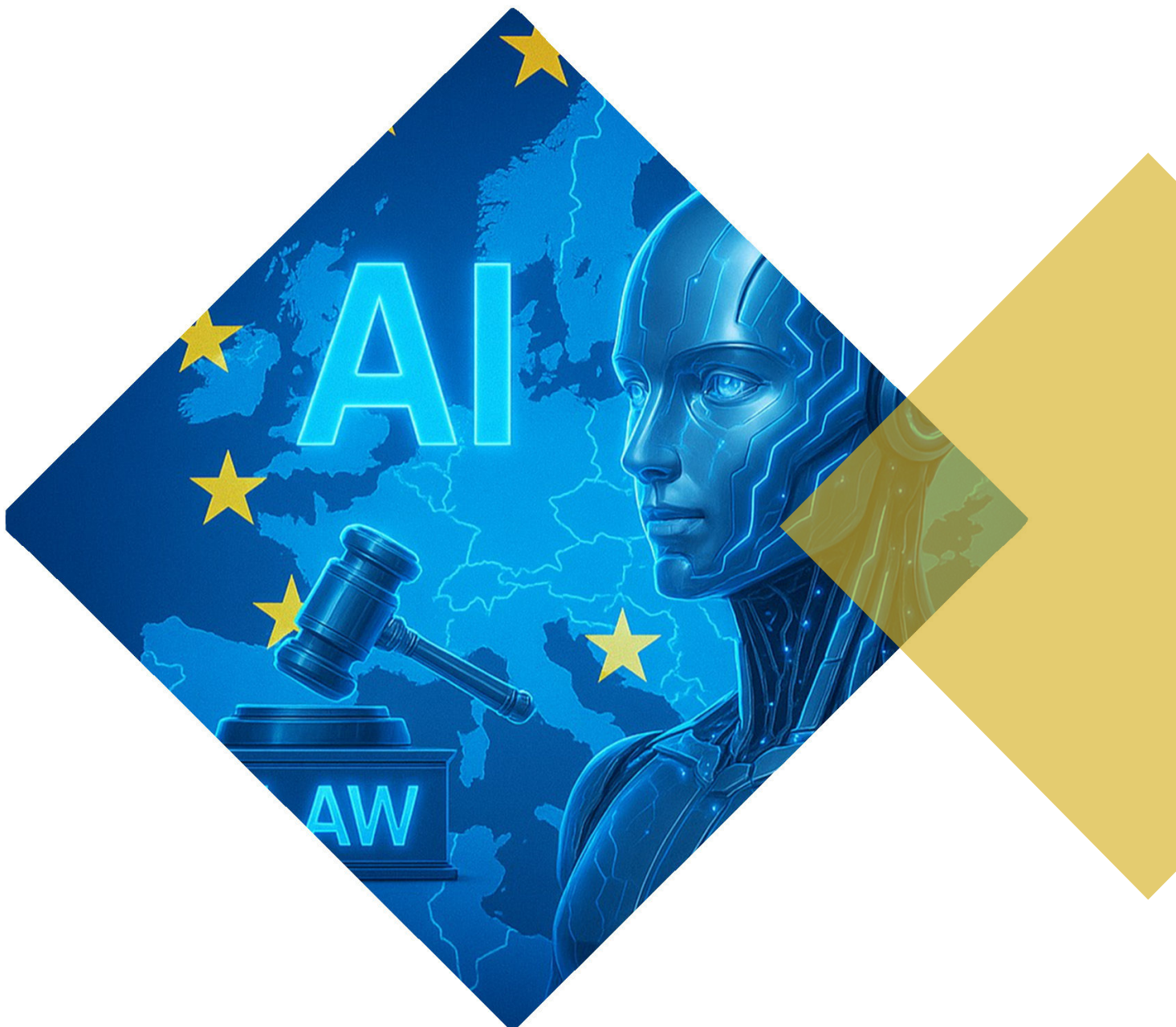# The EU AI Continent Action Plan:

Balancing Complexity and AI Act Simplification

By Theodoros Karathanasis

The EU AI Continent Action Plan:

Balancing Complexity and AI Act Simplification

The EU AI Continent Action Plan aims to position Europe as a global AI leader, specifically targeting regulatory compliance and simplification of the complex AI Act. However, a significant risk exists that simplification efforts could inadvertently weaken regulatory safeguards, introduce ambiguities hindering consistent enforcement across Member States, and compromise the AI Act's fundamental objectives of safety and protection. What is critically at stake is balancing reduced burden with effective regulation, ensuring legal certainty, and demanding meticulous management and extensive collaboration among EU institutions and Member States for consistent application.

The AI Continent Action Plan, set out by the European Commission (EC) on 9 April 2025, aims to position the European Union (EU) as a global leader in the field of Artificial Intelligence (AI), thereby establishing itself as a leading AI continent. Nevertheless, EU's Action Plans have been the subject of frequent criticism regarding their effectiveness, due to the inherent complexities of EU governance.[1]

EU Action Plans serve as pivotal instruments within the EU's policy framework, designed to translate overarching strategies into concrete actions and to drive progress towards specific objectives across a multitude of sectors. They are characterized by focusing on a singular, albeit sometimes broad, objective, detailing specific measures, assigning responsibilities to actors, and setting deadlines.[2] Ideally, they are also meant to be adaptable and subject to regular updates. EU Action Plans have been shown to be a versatile and increasingly utilized policy instrument across a range of domains, serving to operationalize strategies and drive specific objectives.[3] Nevertheless, the efficacy of these measures is often impeded by the inherent complexities of EU governance.[4]

Whilst certain Action Plans[5] (e.g., Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy) explicitly targeted simplification, the process of developing and implementing them within this complex environment continues to face significant hurdles related to clarity, coordination, and achieving tangible outcomes.[6] **The purpose of this article is to explore the success of implementing the AI Content Action Plan under the lens of EU regulatory complexity**.

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[1] Bossong, R. (2008). The Action Plan on Combating Terrorism: A Flawed Instrument of EU Security Governance. Journal of Common Market Studies, 46(1), 27-48; ECDPM. (2014). What EU Comprehensive Approach? Challenges for the EU action plan and beyond. ECDPM Briefing Note, (71); Lorz, B. (2020). Downloading Europe: A Regional Comparison in the Uptake of the EU Forest Action Plan. Sustainability, 12(10), 3999; Nogueira, A. (2023). Are Soft Legal Measures in Circular Economy Action Plans Enough to Permeate EU Strong Economic Core Regulations Bringing Systemic Sustainable Change. Circular Economy and Sustainability, 3, 1545–1568; Ipsos, & Technopolis Group. (2020). Assessment Study of the Urban Agenda for the European Union (UAEU) Final Report. Publications Office of the European Union; Youngs, R., & Ventura, E. (2024). The EU pushes back a new democracy plan: A mistake? A review of the Action Plan on Human Rights and Democracy. SHAPEDEM-EU Publications, Carnegie Foundation Europe (CEF).

[2] Bossong, R. (2008). The Action Plan on Combating Terrorism: A Flawed Instrument of EU Security Governance. Journal of Common Market Studies, 46(1), 27-48.

[3] ECDPM. (2014). What EU Comprehensive Approach? Challenges for the EU action plan and beyond. ECDPM Briefing Note, (71)

[4] The sheer number of actors involved, the diversity of their interests, the persistent challenges in coordination, and the difficulties in ensuring consistent and effective implementation across a multi-level system collectively contribute to criticisms regarding the clarity, coherence, and demonstrable impact of these plans.

[5] Here is a list of certain Action Plans: a) The Action Plan on a More Coherent European Contract Law; b) The 2003 Action Plan on European Company Law; c) The EU Comprehensive Approach and its Action Plan; d) The EU Drugs Strategy 2013–2020 and the Action Plan on Drugs 2013–2016; e) The Urban Agenda for the European Union (UAEU) Thematic Partnerships' Action Plans; f) Nexus Action Plans (Humanitarian-Development-Peace Nexus) and g) The EU Action Plan on Human Rights and Democracy (2020-2024).

[6] Smits, J. (2003). The Action Plan on a More Coherent European Contract Law. Maastricht Journal of European and Comparative Law, 10(2), 111-115; Baums, T. (2007). European Company Law Beyond the 2003 Action Plan. European Business Organization Law Review, 8(1), 143–160; Lorz, B. (2009). EU policies for Sustainable Consumption and Production—the Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy. Journal for European Environmental & Planning Law, 6(3), 277-300; ECDPM. (2014). What EU Comprehensive Approach? Challenges for the EU action plan and beyond. ECDPM Briefing Note, (71); Ipsos Mori, Technopolis Group, & Economisti Associati. (2019). Assessment study of the Urban Agenda for the European Union (UAEU). Publications Office of the European Union; ECDPM and Particip GmbH. (2022). HDP Nexus: Challenges and Opportunities for its Implementation - International Partnerships. Report for the European Commission, EEAS, and ECHO, managed by DG INTPA G5; Youngs, R., & Ventura, E. (2024). The EU pushes back a new democracy plan: A mistake? A review of the Action Plan on Human Rights and Democracy. SHAPEDEM-EU Publications; Published by Carnegie Foundation Europe.

The document will commence by exploring the evolution, aims, and criticisms of **EU Action Plans as versatile policy instruments** used across various domains. The subsequent analysis will examine **the implementation challenges for EU Action Plans within a complex multi-level governance system**, with a view to highlighting how the inherent structure of the EU contributes to these difficulties. After this, the paper will **evaluate the EU AI Continent Action Plan**, specifically assessing its characteristics against those of an ideal action plan and noting where it aligns with or diverges from common criticisms. A dedicated section will delve into **the first key domain of the Action Plan, namely the fostering of regulatory compliance and simplification**, focusing on the foundational role of the AI Act (AIA) and supporting initiatives. This will be followed by an examination of the **practical challenges involved in implementing the AIA**, taking into consideration its complexity, the objective of simplification, and the associated risks within the AI Continent Action Plan. Finally, the document will conclude by discussing **how to effectively manage the AIA simplification process under the AI Continent Action Plan**, outlining necessary steps and collaborations for successful implementation and regulatory refinement.

1. EU Action Plans: A Versatile Policy Instrument

The increasing reliance on EU Action Plans and their deployment across a wide range of policy domains over several decades is reflected in their evolution. In the field of company law, legislative efforts from 1968 to 1989 were primarily aimed at harmonising national laws to protect investors and creditors. After a period of reduced activity, the Commission renewed its efforts, resulting in the adoption of the 2003 Action Plan for a More Cohesive European Contract Law and the 2003 Action Plan for Modernising Company Law and Enhancing Corporate Governance. Action plans have also been developed in response to urgent challenges, such as the European Union Action Plan to Combat Terrorism, which has been extended and revised since 2001.
Similarly, the 2017 Action Plan Against Antimicrobial Resistance (AMR) was designed to stimulate action in that critical health area. Many Action Plans

function as the operational arm of broader EU strategies, like the EU Forest Action Plan (2007-2011) which implemented the first EU Forest Strategy, and the EU Drugs Strategy 2013–2020, which was given effect through its Action Plan on Drugs 2013–2016. This area, in particular, demonstrates a discernible trend towards the adoption of leaner and more focused Action Plans over time.
More recently, the EU Action Plan on Human Rights and Democracy (2020-2024) represents the third iteration under the 2012 Strategic Framework. Furthermore, Action Plans have been adopted for specific sectors and themes, including the Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy (SCP/SIP) and two successive Circular Economy (CE) Action Plans in 2015 and 2020, aimed at fostering an ecological transition. The Urban Agenda for the European Union (UAEU) also operates through Thematic Partnerships, each tasked with developing an Action Plan to address specific urban challenges. The critical Capital Markets Union (CMU) initiative has also seen multiple Action Plans since 2015.
Efforts have also been made to develop an Action Plan on the Comprehensive Approach for EU external action, a concept discussed and called for since 2007, highlighting the ambition for integrated approaches. Notably, the objective of simplification has been explicitly incorporated within the scope of certain Action Plans, such as the 2003 Action Plan on Modernising Company Law and Enhancing Corporate Governance, which specifically aimed for the simplification of existing law. The Circular Economy Action Plans also signal a shift towards utilizing a blend of mandatory and voluntary measures, reflecting a broader tendency towards employing instruments that align more closely with prevailing economic paradigms. The inclusion of Better Regulation as one of the pillars of the Urban Agenda underscores the aim of enhancing the regulatory environment through the action planning process itself.
These varied EU Action Plans have a variety of principal aims. They implement and operationalize broader EU strategies and policy objectives.[7] They establish frameworks for coordinated action involving a variety of stakeholders.[8] They also seek to **enhance specific policy areas**, including corporate governance, human rights and democracy, and sustainable forest management.[9]

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[7] Emilie, B., Matthew, D., Emma, D., Cristina Gonzalez, M., Stephen, H., Stijn, H., Kristy, K., Martin, S., & Jirka, T. (2018). Mid-Term Assessment of the EU Drugs Strategy 2013-2020 and Final Evaluation of the Action Plan on Drugs 2013-2016: Final report. Rand health quarterly, 7(2), 4.

[8] Bossong, R. (2008). The Action Plan on Combating Terrorism: A Flawed Instrument of EU Security Governance. Journal of Common Market Studies, 46(1), 27-48.
[9] Youngs, R., & Ventura, E. (2024). The EU pushes back a new democracy plan: A mistake? A review of the Action Plan on

Action plans are also employed to **address complex, cross-cutting issues** such as security and development challenges.[10] Crucially, they can **facilitate compliance** and, in certain contexts, **simplify the application of regulatory frameworks**. Despite their significant role and ambitious objectives, the implementation of EU Action Plans is subject to recurring criticisms. One major criticism is the lack of strategic clarity and vision.[11] Some plans have been perceived as **broad programmatic statements or mere "wish lists"** containing numerous measures that lack overall coherence or a clear, unified strategic direction.

Another frequent issue is the **deficiency in structure and guidance**.[12] For example, the [Human Rights and Democracy Action Plan (2020-2024)](#) has been criticized for the omission of clear timelines, failure to explicitly assign responsibility to specific actors, and the absence of concrete indicators for its stated priorities, making it difficult to assess implementation and leaving actors without sufficient practical guidance. Critics also point to **limitations in the plans' capacity to truly drive change**.[13] Examples such as the [Forest Action Plan](#) and the [Drugs Action Plan](#) suggest that sometimes, Action Plans may simply reflect existing activities or principles rather than serving as a catalyst for innovation or fundamental change. This can be exacerbated by the absence of binding targets, variable levels of commitment from different actors, or a lack of dedicated resources.

Coordination and coherence failures are also a persistent challenge in the implementation process. Discussions around the [Comprehensive Approach to External Action](#) highlighted policy inconsistencies and gaps, a **prevalent 'silo' culture and uneven coordination and political strategy among different actors**.[14]

Significant difficulties arise moreover from engaging Member States in the implementation process, as the level of involvement and commitment varies. **Divergent national priorities and interests** can hinder consensus building, often resulting in outcomes representing the 'minimum common denominator'. Member states may also be **reluctant to fully align their bilateral agendas with EU policy coherence objectives**.

Furthermore, moving beyond mere **legal compliance** to assess the practical implementation[15] of Action Plans is **complex and challenging**.[16] Understanding how policies are applied in practice requires systematic evaluation, which can be a resource-intensive process that is not always fully developed.[17]

Assessing these criticisms under the lens of EU regulatory complexity reveals that many of the observed challenges are deeply rooted in the inherent nature of the EU's governance system.

2. Assessing the EU AI Continent Plan: An "Ideal Plan" or a "Comprehensive 'Wish List'"?

It is generally accepted that an action plan should **ideally focus on a single objective**, **specify concrete measures, responsible actors, and deadlines**, and **be responsive to change, updated regularly**.[18] In order to achieve the objectives of an action plan, it is essential to clarify these objectives within a broader strategic analysis. This analysis should strike a balance between the various goals and timeframes/targets, and these should be set at a realistic level. In addition, sufficient capacity and a relatively controllable environment for implementation are required.[19] **In the absence of these conditions, the propagation of action plans has the potential to engender misleading expectations.**

Human Rights and Democracy. SHAPEDEM-EU Publications, Carnegie Foundation Europe (CEF).

[10] ECDPM. (2014). What EU Comprehensive Approach? Challenges for the EU action plan and beyond. ECDPM Briefing Note, (71)

[11] Bossong, R. (2008). The Action Plan on Combating Terrorism: A Flawed Instrument of EU Security Governance. Journal of Common Market Studies, 46(1), 27-48.

[12] Youngs, R., & Ventura, E. (2024). The EU pushes back a new democracy plan: A mistake? A review of the Action Plan on Human Rights and Democracy. SHAPEDEM-EU Publications, Carnegie Foundation Europe (CEF).

[13] European Commission: Directorate-General for Migration and Home Affairs, EY, RAND Europe, Disley, E., Taylor, J., Sacher, M., Hoorens, S., Kruithof, K., Balbirnie, E., Davies, M., Gonzalez Monsalve, C., & Hartka, S. (2016). Mid-term assessment of the EU drugs strategy 2013-2020 and final evaluation of the action plan on drugs 2013-2016: final report, Publications Office.

[14] Faria, F. (2014). What EU comprehensive approach? Challenges for the EU action plan and beyond (Briefing Note 71). European Centre for Development Policy Management (ECDPM).

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[16] Thomann, E., & Sager, F. (2017). Moving beyond legal compliance: innovative approaches to EU multilevel implementation. Journal of European Public Policy, 24(9), 1253–1268.

[17] Land, T., Hauck, V., Desmidt, S., Keita, A., Veron, P., Weller, E., Mackie, J., & Wagner, A. (2022). HDP Nexus: Challenges and opportunities for its implementation – Final report. European Centre for Development Policy Management (ECDPM) & Particip GmbH.

[18] Bossong, R. (2008), The Action Plan on Combating Terrorism: A Flawed Instrument of EU Security Governance. JCMS: Journal of Common Market Studies, 46: 27-48

[19] Action plans may also be motivated by political factors, with the aim of promising concrete "actions" that could strengthen the EU's output legitimacy.

The AI Continent Action Plan demonstrates numerous hallmarks of an **ideal action plan**.[20] The document is clearly focused on the **overarching goal of the EU** becoming a *global leader in Artificial Intelligence, a leading AI continent*.[21] It **outlines a set of bold actions to achieve its goal**. It **specifies concrete measures** such as investing in large-scale AI computing infrastructures (e.g., AI Factories, AI Gigafactories) or fostering regulatory compliance and simplification. It also **identifies responsible actors[22]** and mentions the need for collaboration across EU institutions, governments, companies, researchers, and developers. Crucially, the plan includes also **specific timelines and deadlines for numerous actions**, such as launching the AI Act Service Desk (**July 2025**), publishing the official call for AI Gigafactories (**Q4 2025**) or even operationalizing national AI regulatory sandboxes (August 2026), launching the RAISE pilot (**by 2026**).[23] A level of detail that contrasts favorably with criticisms of some other EU action plans for lacking clear timelines and designated responsibilities. The plan does mention **building on the lessons learned during the implementation phase of the AIA to identify further measures**.[24] it is moreover framed within a **clear strategic vision for Europe in AI**. It is linked to the "political priorities of the Competitiveness Compass" and builds upon existing frameworks like the AIA.[25]

The proposed plan involves the **mobilization of substantial financial resources**, including the allocation of EUR 200 billion via the InvestAI initiative, which suggests an effort to ensure **sufficient capacity for implementation**.

By setting out specific actions, identifying actors, and providing timelines, the plan aims to operationalize the strategic goal and reduce ambiguity in policy implementation. The structure of the plan, particularly the listing of "Key Commission actions" with specific timelines, functions similarly to a roadmap, providing a sequence of steps and milestones towards the broader objective. **However, the environment of AI development is inherently dynamic and not entirely controllable, which can challenge the realism of targets.**

The necessity for operational objectives to be defined in terms of deliverables and linked to indicators is a characteristic of effective policy initiatives.[26] The plan stipulates the **identification of "sector-specific AI-related deliverables and KPIs"** for the Apply AI Strategy through structured dialogues. While the plan mentions developing these for some areas, the degree to which it incorporates a comprehensive set of specific, measurable, achievable, relevant, and time-bound **(S.M.A.R.T.) indicators** and targets across all its priorities, and its explicit commitment to regular updates and inherent adaptability, are less clearly detailed in the action plan.[27]

This apparent **absence of detailed S.M.A.R.T. elements** is consistent with observations made in relation to other EU Action Plans. For instance, the EU Drugs Strategy Action Plan enumerated actions with associated indicators and references to responsible institutions. However, the specific objectives and actions frequently remained quite broad, and the plan functioned more as a "comprehensive wish list" or a common political document rather than a strategy with concrete, time-bound objectives designed to drive action. In a similar vein, the **Human Rights and Democracy Action Plan** was the subject of censure on account of its failure to incorporate explicit temporal frameworks and its inability to allocate explicit responsibility for each priority to specific EU actors. This deficiency resulted in a situation in which relevant parties were left without adequate guidance, thereby rendering the assessment of implementation progress quantitatively challenging.[28] The **Circular Economy Action Plan** also contained actions stated in vague or tentative

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[20] An ideal-typical action plan should therefore a) focus on a single objective; b) specify concrete measures, responsible actors, and deadlines; c) be responsive to change and updated regularly; d) have its objective clarified within a wider strategic analysis; e) set realistic timeframes and targets, requiring sufficient capacity and a relatively controllable environment; f) lower policy ambiguity by specifying details; g) include a roadmap with deliverables, target dates, and responsible organizations and h) ideally, include specific, measurable indicators and targets. The ideal-typical characteristics of an EU Action Plan are derived from analyses of various action plans and draw on insights from scholarly literature on policy implementation, such as Raphael Bossong, Richard Youngs and Elena Ventura.

[21] This aligns well with the ideal characteristic of having a single, even if broad, objective.

[22] including the EC, the AI Office, the EuroHPC Joint Undertaking, Member States, European Digital Innovation Hubs,

[23] The RAISE pilot, part of the broader Union of Skills strategy, aims to enhance the skills of the EU workforce, particularly in basic skills like reading, writing, and math, as well as in STEM fields, according to the European Commission.

[24] This suggests a degree of responsiveness, though the concept of routine updates is not detailed in the provided text.

[25] This indicates its objective is clarified within a wider strategic analysis.

[26] European Parliamentary Research Service. (2025). Quality analysis of European Commission impact assessments – Developments during the 2019-2024 term (Study No. PE 765.770).

[27] European Commission. (2025). Better Regulation Toolbox, 2023, Tool #15, pp. 110-111.

[28] Youngs, R., & Ventura, E. (2024). The EU pushes back a new democracy plan: A mistake? A review of the Action Plan on Human Rights and Democracy. SHAPEDEM-EU Publications, Carnegie Foundation Europe (CEF).

terms, making it easy to claim progress even if it was negligible. [29]

In order for an action plan to achieve its desired objectives, it is essential that the goals themselves are clearly defined. Furthermore, it is imperative that the timeframe and targets are both realistic and supported by sufficient capacity. Measurable indicators are considered essential for evaluating success. The EU should accelerate its efforts in five key domains if it is to become a **leading AI continent**.

3. Fostering Regulatory Compliance and Simplification in the AI Continent Action Plan: The Role of the AI Act

The first of these **five domains** is the fostering of regulatory compliance and simplification. The foundational legislation within this domain is the AIA.[30] The AIA employs a targeted, risk-based approach, imposing requirements primarily on high-risk AI applications. A significant objective within this pillar is to facilitate compliance with the Act. This is of particular importance for smaller innovators and stakeholders in general. The primary objective is to ensure that the implementation of the AIA is both **seamless and foreseeable**.

Specific initiatives underpin these objectives. The launch of an AI Act Service Desk in the EU AI Office, planned for July 2025, aims to serve the needs of smaller providers and deployers by providing straightforward and free access to information and guidance on the applicable regulatory framework. AI regulatory sandboxes, which Member States are setting up and are planned to be operational by August 2026, are intended to facilitate cooperation during the development of high-risk AI systems.[31] A public consultation launched on 9 April 2025 as part of the Apply AI Strategy includes specific questions to identify stakeholders' regulatory challenges.[32]

While EU Action Plans may not be legal instruments themselves, they operate within, aim to influence, are constrained by, and can give rise to binding legal frameworks at both the EU and national levels. Their effectiveness and impact are therefore intrinsically linked to their interaction with the **EU's complex legal architecture**.

4. Implementing the AI Act: Complexity, Simplification, and Risks within the AI Continent Action Plan

Regulatory complexity is identified as one of the **ten factors** that influence the correct implementation of EU law by Member States.[33] It is specifically highlighted as a key objective of better regulation to reduce the complexity of EU law in order to achieve effective implementation. **Simplification** of complex EU law is seen on the other hand as a way to **reduce the scope for "drift"** as the law proceeds downwards through the Member State administration.[34] Implementation challenges are also particularly pronounced when the law is not only complex but also in an area of **high national political sensitivity** and thus political contestation.[35] The AIA is a highly **complex piece** of legislation due to its **structure, language, and relations between norms and acts**. This inherent complexity already poses considerable implementation challenges, potentially leading to inconsistent application and administrative burdens for Member States and businesses. In this context, the pursuit of simplification, although ostensibly aligned with the broader objectives of the EU, is not without its risks. It is important to note the **potential risk of inadvertently weakening the regulatory safeguards** embedded within the AIA by simplification. This could potentially result in a **less stringent enforcement regime**. The implementation of simplification efforts that are not adequately conceived could result in **ambiguities or omissions**. These, in turn, could lead to more challenging circumstances with regard to consistent

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[29] Nogueira, A. (2023). Are soft legal measures in circular economy action plans enough to permeate EU strong economic core regulations bringing systemic sustainable change? Circular Economy and Sustainability, 3, 1545–1568.

[30] The AI Act was implemented on 1st August 2024 and is being progressively introduced until its complete implementation by 2nd August 2027

[31] For an analysis on risks classification, see T. Christakis, T. Karathanasis, Tools for Navigating the EU AI Act: (2) Visualisation Pyramid, AI Regulation Papers 24-03-5, AI-Regulation.com, March 8th, 2024.

[32] The objective here is to identify where regulatory uncertainty is hindering development and adoption and how stakeholders can be better supported. The results of this consultation will

inform the provision of templates, guidance, webinars, and training courses aimed at streamlining procedures and facilitating compliance. The consultation results will feed into a broader assessment of whether the expanded digital rules, including the AI Act, adequately reflect the needs and constraints of businesses like SMEs and small midcaps, going beyond necessary guidance and standards that facilitate compliance.

[33] Smith, M. (2018). Challenges in the implementation of EU Law at national level (PE 608.841). European Parliament.

[34] Deviation from the original policy intention.

[35] Issues described as complex, salient and conflictive can slow down implementation, especially in national parliaments with less sophisticated administrative structures and decision-making capacity.

interpretation and enforcement across Member States. This **undermines the harmonized approach** that the AIA aims to achieve. The **linguistic complexity of the AIA**, even in the absence of national transposition, has the potential to give rise to divergent interpretations by national authorities. Simplification efforts could potentially compromise the provisions of the AIA and the **equilibrium** it maintains between **economic and ethical dimensions**. This could result in the Act **failing to achieve its primary objectives** of enhancing the internal market, promoting reliable AI, and ensuring a high level of protection for health, safety, and fundamental rights.[36] Paradoxically, if simplification leads to **ambiguities or weakens clarity**, it could make it harder for businesses to understand and comply with their obligations.

Roberto Viola, Director General of **DG CONNECT**, has expressed concerns that the EU AI project could encounter significant challenges without establishing AI standards that are imperative for ensuring safety, security, and commercial success. Furthermore, he acknowledged the potential for the AIA to impose an additional regulatory burden on companies, particularly regarding reporting obligations and the complexity of the legislation.[37] The objective, therefore, is to **identify a method of mitigating this burden** through simplification without compromising the fundamental regulatory mechanisms and clarity required for the AIA to be effective, consistently implemented, and to achieve its intended protections.

5. Managing the AI Act Simplification Process under the AI Continent Action Plan

To align with the AI Continent Action Plan's objective of **fostering regulatory compliance and simplification**, it is essential to manage simplification with the utmost care. **The outcome should not be regarded as a deregulatory measure.** Instead, it should serve to strengthen legal certainty and facilitate more consistent national implementation.

It is imperative to recognize the significance of **good will and cooperation** in this context. Such cooperation is not only necessary among the various Commission DGs and EU institutions (**Parliament, Council, Commission**), but also, and crucially,

among **Member States**. The onus is on Member States to demonstrate a **full commitment to the allocation of necessary resources and the development of consistent enforcement mechanisms**.

The Commission's request for the opinions of Member States on the facilitation and simplification of implementation constitutes a component of this process. Whilst the AIA is being adopted, it is vital that the current text is made clear, unambiguous and easy to implement to minimize complications in the future. This process entails meticulous legal scrutiny and contemplation of the practical ramifications for business entities, particularly SMEs.

Any simplification must carefully **balance the desire to reduce burdens with the need to maintain effective regulation, protect citizens, and ensure a level playing field**. Simplification efforts should aim to refine the current regulatory landscape by eliminating unnecessary complexities and streamlining procedures, rather than through deregulation. The "stress-testing of EU legislation" process has the potential to facilitate the identification of simplification opportunities while ensuring the preservation of the fundamental objectives of the legislation.

Conclusion

The purpose of this document was to explore the effectiveness of implementing the AI Continent Action Plan in the context of **EU regulatory complexity**. While demonstrating many hallmarks of an ideal plan with its clear purpose, specific measures, identified actors, and timelines, the assessment also noted potential areas, particularly regarding the comprehensive inclusion of **S.M.A.R.T. indicators** and targets across all priorities, that align with common criticisms of other EU Action Plans.

The **effective management** of the **AIA simplification process** under the AI Continent Action Plan necessitates a highly collaborative and iterative approach. The findings suggest that while the AI Continent Action Plan establishes an ambitious course of action with meticulous initial steps, its ultimate effectiveness in navigating regulatory intricacy and achieving substantial simplification of the AIA will be contingent on **sustained collaboration, meticulous management of the simplification process, and a commitment**

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[36] However, it is important to note that over-simplification may potentially compromise the regulatory foundations required for effective enforcement, thereby complicating the task of national authorities in ensuring consistent compliance with the law.

[37] Marcus, J. S., & Sekut, K. (2024, September 23). Simplifying EU law: A cumbersome task with mixed results. Bruegel.

from all stakeholders to the Act's fundamental objectives.[38]

On 26 May 2025, it was reported that the **EC** was considering postponing the implementation of the AIA.[39] This potential **"stop the clock" measure** is directly linked to the simplification effort, intended to facilitate the passing of targeted amendments aimed at simplifying certain aspects of the law.[40] However, a delay could **impact the overall timeline and effective implementation** of the AIA, despite the Commission stating that the Act's main objectives remain unchanged.

The potential delay, presented as an opportunity for simplification, underscores the challenging balancing act between the ambitious goals of the AI Continent Action Plan and the practical difficulties of implementing a complex law such as the AIA. In addition, there is a **need to respond to diverse stakeholder influence and political dynamics** at play in the simplification debate.

Therefore, "meticulous management" and "extensive collaboration" are not just theoretical recommendations but essential requirements when faced with the **practical difficulties** potentially leading to delays and contentious simplification debates. Further analysis tracking the actual implementation and the practical impact of simplification efforts on different stakeholders across Member States over time would offer valuable insights into the long-term effectiveness of the AI Continent Action Plan.

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[38] Subnational policies in Germany, for example, are being shaped with an awareness of and stated commitment to broader European values and ethical considerations relevant to AI, even if the specific details of implementing comprehensive regulation within the complex multi-level system are still being navigated. See Liebig, L., Güttel, L., Jobin, A., & others. (2024). Subnational AI policy: Shaping AI in a multi-level governance system. AI & Society, 39(4), 1477–1490.

[39] This consideration stems from several issues, including a) controversy around a code of practice for AI models; b) growing pushback from the industry; c) delays in the development of technical standards needed to operationalize the law and d) a request from the US government to pause implementation.

[40] A digital simplification omnibus is being considered as a potential legislative vehicle for such changes.

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