



Legislating the Algorithm: The European Parliament's Experimentalist Turn in EU AI Regulation

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ABSTRACT

This paper investigates how the European Parliament operationalized experimentalist governance principles in shaping the EU Artificial Intelligence Act. Through a detailed analysis of legislative amendments, committee structures, and stakeholder engagement, the study examines the Parliament's role as a normative and institutional anchor in the AI policy cycle. The research is guided by the question: How did the European Parliament operationalize experimentalist governance principles in shaping the EU Artificial Intelligence Act? The hypothesis tested is that the European Parliament's strategic use of amendments, stakeholder engagement, and institutional reforms enabled the transformation of the EU AI Act from a technocratic proposal into a recursive, rights-based governance framework. The findings demonstrate that the Parliament consistently acted as a transmission belt—connecting civil society, expert networks, and legal institutions to formal policymaking. Its emphasis on horizontal regulation, transparency obligations, and ethical safeguards shaped the final text of the law, particularly in relation to general-purpose AI models, deepfakes, and high-risk applications. Structural reforms such as the creation of the AI Office and the embedding of fundamental rights impact assessments reflect the Parliament's commitment to democratic legitimacy and adaptive oversight. By institutionalizing peer review, stakeholder consultation, and cross-border enforcement mechanisms, the Parliament redefined the procedural and normative architecture of EU digital regulation. This study contributes to broader debates on digital governance, legislative innovation, and the role of democratic institutions in regulating emerging technologies.

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1. Introduction

The European Union's Artificial Intelligence Act (AI Act) represents a landmark effort to regulate emerging technologies through a rights-based, multi-level governance framework. While much scholarly attention has focused on the implications of the AI Act for national parliaments, pre-legislative discourse within the European Parliament, and its normative positioning in digital constitutionalism, existing literature has yet to fully examine the Parliament's procedural and institutional influence during the drafting and negotiation of the law. This study addresses that gap by analyzing how the European Parliament operationalized experimentalist governance principles—moving beyond rhetorical advocacy to embed ethical safeguards, structural reforms, and transparency obligations into binding legal provisions.

Experimentalist governance, characterized by iterative negotiation, peer review, and adaptive institutional design, offers a compelling lens through which to understand the Parliament's role in shaping the AI Act. Rather than functioning as a passive legislative chamber, the Parliament acted as a transmission belt—connecting civil society, expert networks, and formal institutions to ensure that normative concerns were translated into enforceable regulatory mechanisms. Through its amendments, committee structures, and trilogue negotiations, the Parliament introduced horizontal regulation of foundational models, established oversight bodies like the AI Office, and mandated fundamental rights impact assessments for high-risk AI systems.

This research is guided by the question: *How did the European Parliament operationalize experimentalist governance principles in shaping the EU Artificial Intelligence Act?* The hypothesis tested is that *the European Parliament's strategic use of amendments, stakeholder engagement, and institutional reforms enabled the transformation of the EU AI Act from a technocratic proposal into a recursive, rights-based governance framework.* By tracing these interventions, the study contributes to broader debates on digital regulation, democratic accountability, and the evolving role of legislative institutions in the governance of artificial intelligence.

2. Theoretical framework

This article adopts a framework of experimentalist governance to analyze the European Parliament's role in shaping the EU AI Act. In this model, governance unfolds through a multi-level process structured around four core functions: First, broad framework goals and measurable indicators are jointly defined through deliberation among EU institutions and Member States. Second, lower-level units—such as national authorities or parliamentary committees—are granted discretion to pursue these goals in contextually appropriate ways. Third, in exchange for this autonomy, they are required to report regularly on their performance using agreed indicators and participate in peer review, comparing outcomes with others pursuing similar objectives through different methods. Fourth, the framework goals, metrics, and procedures are periodically revised by the original actors, now joined by new participants whose perspectives are deemed essential for fair and comprehensive evaluation (C. F. Sabel & Zeitlin, 2010).

These four elements should be understood not as fixed institutional mechanisms but as essential governance functions that can be realized through diverse institutional arrangements. In such architecture, there is no one-to-one correspondence between governance tasks and

specific policy tools. Consensus emerges through public reasoning and deliberation, but remains provisional—subject to revision when better solutions are found. This recursive process fosters dynamic accountability, enabling regulation that protects citizens' rights without halting decision-making. The European Parliament, in this context, acts as a democratic engine of direct deliberative governance, where public justification and peer oversight reinforce the legitimacy of institutional choices (C. Sabel, 2001).

Experimentalist governance thrives under conditions of strategic uncertainty and dispersed authority. The European Parliament's role becomes especially salient in regimes of destabilization, where actors are compelled to justify their positions publicly, respond to challenges, and accept the risk of reputational or procedural penalties. Under the shadow of central authority—such as the Commission—actors know that refusal to cooperate may result in suboptimal outcomes imposed from above. In such regimes, peer review and deliberative pressure prevent unilateral imposition and promote negotiated convergence. The Parliament's capacity to mediate between old and new forms of governance, and to embed recursive mechanisms into legal structures, positions it as a pivotal institution in the democratization of digital regulation.

To operationalise experimentalist governance in the context of the EU AI Act, this study identifies five observable practices: (1) iterative revision of regulatory scope and definitions through parliamentary amendments; (2) institutionalised peer review via multi-committee deliberation and stakeholder workshops; (3) recursive feedback between formal legislative proposals and informal expert input; (4) adaptive oversight mechanisms, such as the creation of the AI Office and the scientific advisory panel; and (5) periodic review clauses that require the Commission to adjust thresholds in response to technological change. Where these practices are present, they are treated as evidence of experimentalist dynamics. The paper further adopts a rights-based governance lens. 'Rights-based governance' denotes a regulatory approach in which the protection of fundamental rights is embedded into institutional design, oversight mechanisms, and accountability structures. Within this approach, three related but distinct concepts are used: 'algorithmic transparency' refers to disclosure obligations—including the documentation of training data, model capabilities, and limitations; 'algorithmic accountability' encompasses mechanisms that assign responsibility and provide remedies for harm, such as fundamental rights impact assessments, liability rules, and complaint systems; and 'algorithmic oversight' signifies the institutional structures—like the AI Office or national supervisory authorities—that monitor and enforce compliance.

3. Literature review

In the article "*AI Act and National Parliaments: How the EU is Regulating Democracy in the Digital Era*" by Bresciani and Palmirani, the focus is primarily on how the AI Act affects national parliaments, particularly in terms of democratic accountability and institutional autonomy. The authors argue that while the AI Act formally applies to national parliaments, its obligations are minimal, leaving substantial discretion to Member States in addressing AI-related risks to democratic processes (Pier Francesco Bresciani & Monica Palmirani, 2025). The European Parliament is not the central subject of the article and is only briefly mentioned, if at all, in relation to the broader EU legislative framework. The article does not analyze the

European Parliament's role in shaping the AI Act or its contributions to experimentalist governance, instead concentrating on the implications of the regulation for national legislative bodies and the tension between EU-level oversight and domestic democratic functions.

The article "*Navigating the AI frontier: European parliamentary insights on bias and regulation, preceding the AI Act*" by Alessia Chiappetta explores how Members of the European Parliament (MEPs), particularly within the Special Committee on Artificial Intelligence in a Digital Age (AIDA), engaged with the ethical and regulatory challenges of AI prior to the formal adoption of the AI Act. Through discourse analysis of parliamentary hearings and committee discussions, the article reveals that MEPs expressed growing concern over algorithmic bias, discrimination, and the societal risks posed by AI systems. Although technical understanding varied among MEPs, there was a shared recognition of the need for regulatory intervention to safeguard democratic values and fundamental rights. The Parliament is portrayed as a space where normative debates around fairness, transparency, and accountability were actively shaped, even before legislative consensus was reached. The article highlights the Parliament's evolving awareness of AI's societal risks and its role in shaping the ethical discourse around digital technologies (Chiappetta, 2023). However, it focuses primarily on pre-legislative perceptions and rhetorical framing, rather than on the Parliament's institutional and procedural influence during the drafting and negotiation of the AI Act itself. While it captures the anticipatory concerns of MEPs, it does not analyze how these concerns were translated into concrete legislative amendments, structural reforms, or governance mechanisms within the final text of the AI law. This study fills that gap by tracing the European Parliament's operational role in the experimentalist governance cycle of the AI Act. It examines how the Parliament moved beyond discourse to institutional design—proposing horizontal regulation, embedding rights-based safeguards, and establishing oversight bodies like the AI Office. By analyzing the Parliament's amendments, committee structures, and trilogue negotiations, this research shows how democratic institutions can transform normative concerns into binding legal authority within a recursive governance framework.

The article "*AI and Democracy: the Role of the European Parliament in Shaping the EU 'AI Act'*" by Raffaella Cinquanta offers a political and normative analysis of the European Parliament's efforts to embed democratic values into the AI regulatory framework. It highlights the Parliament's emphasis on transparency, civic engagement, and ethical safeguards, portraying it as a guardian of fundamental rights in the digital era. Drawing on committee reports and legislative files, the article situates the Parliament's role within broader debates on digital constitutionalism and the redefinition of the social contract (Cinquanta, 2025). However, the study focuses primarily on the Parliament's normative positioning and political discourse, without examining the procedural mechanisms, institutional reforms, and recursive governance structures through which these values were operationalized. My study fills this gap by analyzing how the European Parliament translated ethical concerns into binding legal provisions—such as horizontal regulation of foundational models, the creation of the AI Office, and the embedding of rights-based impact assessments—thus demonstrating its central role in shaping the AI Act through experimentalist governance.

Since the final adoption of the AI Act, a growing body of scholarship has turned from the legislative process to questions of implementation, enforcement, and fundamental-rights operationalisation. Novelli et al. (2024) provide the first comprehensive mapping of the Act's governance architecture—the AI Office, the AI Board, the Scientific Panel, and national authorities—proposing a normative model for coordinated enforcement. Söderlund and Larsson (2024) analyse the Act's enforcement design patterns, comparing its mixed centralised/decentralised structure with the GDPR and highlighting potential consistency challenges. Ho-Dac (2025) critically examines the Act's "human rights risk-based approach," assessing whether the protection of fundamental rights can be effectively operationalised within a product-safety framework. Ebers (2024) contends that the AI Act, despite inconsistencies, contains sufficient adaptive tools for a genuinely risk-based and iterative implementation. These post-adoption analyses confirm several of the institutional dynamics identified in the present study—particularly the centrality of recursive oversight, rights-based accountability, and multi-level coordination—and underscore the continued relevance of an experimentalist governance lens for understanding the evolving EU AI regime.

4. Deliberative peer review in the European Parliament: normative reform of the AI law

The European Parliament's engagement with the AI Act exemplifies the institutionalization of deliberative peer review as a mechanism for normative reform within an experimentalist governance framework. Rather than merely reacting to the Commission's proposal, the Parliament orchestrated a multi-committee process that foregrounded ethical, legal, and societal dimensions of AI regulation. Through joint rapporteurs, stakeholder consultations, and civil society input, the Parliament positioned itself as a site of normative pressure and democratic legitimacy—where pluralistic deliberation shaped the contours of EU digital law. This section explores how the Parliament's structured review process enriched the AI Act's normative content, embedding human rights, anti-discrimination safeguards, and standardization principles into the legislative core.

In the context of experimentalist governance, the European Parliament's committee engagement with the AI law is an example of the institutionalization of peer review as a mechanism for normative reform and democratic legitimacy. Through shared responsibility between the main committees and the participation of relevant committees including legal affairs, industry and education, the Parliament facilitated a multi-faceted consultation that integrated ethical, legal and social concerns into the legislative process. The appointment of dual rapporteurs, the inclusion of civil society views and the emphasis on human rights, anti-discrimination and standardization reflect a structured process of review and reform that goes beyond technical calibration. This deliberative architecture not only enriched the normative content of the AI law, but also strengthened the role of the Parliament as a locus for normative pressure and spillover, where stakeholder engagement and institutional pluralism converge to shape the path of EU digital regulation.

Within the European Parliament, a robust institutional framework was established to guide the governance of artificial intelligence. Under the influence of major Union parties such as the European People's Party, the Committee on the Internal Market and Consumer Protection and

the Committee on Civil Liberties, Justice and Home Affairs were designated as lead committees under the joint committee procedure. Two joint rapporteurs were appointed to report from each, while additional committees—including Legal Affairs, Industry, Research and Energy, and Culture and Education—were designated as relevant contributors. This structure enabled the Parliament to serve as a central arena for civil society institutions and economic lobbies, balancing ethical concerns with market and consumer interests (Council of the European Union, 2022).

The June 2022 amendments submitted by the lead committees reflected the Parliament's commitment to human-centered AI, ethical safeguards, and normative alignment with foundational legal instruments such as the Universal Declaration of Human Rights, the European Convention on Human Rights, and the Charter of Fundamental Rights of the European Union (European Parliament, 2022). The amendments emphasized environmental protection, consumer rights, and the need for clarity in defining “automated decision-making,” which was framed as the delegation of a user's decision to a system or service. Coherence with data governance and the General Data Protection Regulation was also prioritized, alongside disability rights—ensuring equal access to digital systems and protection of privacy for persons with disabilities.

The Parliament's committees also addressed risks of discrimination, particularly in law enforcement applications of AI that rely on profiling or predictive analytics. Such systems were deemed incompatible with human dignity and the presumption of innocence, and were therefore proposed for prohibition. Human oversight was another key concern, with amendments calling for trained personnel to supervise high-risk AI systems and mitigate adverse effects. Finally, the Parliament emphasized the importance of benchmarking and standardization, proposing that the European AI Board coordinate national measurement authorities—not as a substitute for standardization bodies, but as a complementary source of technical expertise (European Parliament, 2022). Through these layered interventions, the Parliament reinforced its role as a normative anchor and legislative engine in shaping the ethical and procedural contours of EU AI regulation.

5. Parliament: Horizontal regulation of fundamental models and structural innovation in the governance of AI

Building on its deliberative engagement with the AI Act, the European Parliament has emerged as a key architect of structural reform in EU digital governance. This section examines how the Parliament's amendments introduced a horizontal regulatory framework for foundational models—such as generative AI systems—while simultaneously reconfiguring the institutional architecture through the creation of the AI Office. These interventions reflect the Parliament's experimentalist orientation: embedding iterative oversight, stakeholder participation, and transnational coordination into the legislative design. By advancing legally binding obligations for transparency, safety, and rights-based accountability across all AI systems, regardless of sector or scale, the Parliament positions itself not merely as a co-legislator but as a normative engine driving adaptive and pluralistic governance. The parliamentary debates and early amendments referred to ‘foundational models,’ while the final adopted regulation settled on the

term ‘general-purpose AI models.’ In this article, I use the language that corresponds to the legislative phase under discussion.

In June 2023, the European Parliament adopted the Commission’s AI law proposal with substantial amendments, establishing its formal position for trilogue negotiations. The plenary vote on 14 June passed with overwhelming support—499 in favor, 28 against, and 93 abstentions—marking a decisive moment in shaping the EU’s AI regulatory framework (European Parliament, 2023). The scale of parliamentary engagement underscores the experimentalist character of this phase. By the close of the committee stage in June 2022, over 3,000 amendments had been submitted to the joint IMCO-LIBE draft report, with five additional parliamentary committees—including Legal Affairs (JURI), Industry (ITRE), and Culture (CULT)—contributing formal opinions. By the time the consolidated report reached the plenary in June 2023, approximately 4,000 amendments had been tabled across the Parliament’s committees (European Parliament, 2023). This extraordinary volume of amendment activity was not merely procedural: it reflected the Parliament’s function as a transmission belt, channelling civil-society, expert, and multi-party input into the legislative text. Key outcomes of this iterative process—the introduction of horizontal transparency obligations for general-purpose AI models, the expansion of prohibited practices to include predictive policing and emotion recognition, and the creation of the AI Office—emerged directly from amendments that had been refined through successive rounds of committee deliberation and stakeholder consultation. The Parliament’s amendments emphasized EU values, fundamental rights, democracy, and environmental protection, while refining the list of high-risk applications and prohibited practices. Notably, the Parliament introduced specific provisions for transparency and safety in foundational and generative AI systems, and proposed a revised definition of AI that reflected input from civil society, legal institutions, and international bodies such as the OECD. This definition, along with expanded rights for individuals to lodge complaints and seek explanations for decisions made by high-risk AI systems, reinforced the Parliament’s role as a normative anchor and transmission belt within experimentalist governance.

The Parliament’s horizontal approach to regulating foundational models was a key feature of its amendments. It proposed equal treatment for all service providers, regardless of scale, and introduced proportionate obligations for models like ChatGPT. These included risk mitigation through design and testing, bias assessment, technical performance standards, and environmental compliance. Transparency obligations were also central—requiring documentation of training data, model capabilities, limitations, and deployment criteria. While these models were not classified as high-risk, the Parliament’s framework ensured they met the Regulation’s broader objectives: protecting fundamental rights, health, safety, and democratic integrity (European Parliament, 2023b). The Parliament also introduced provisions for joint investigations, allowing national supervisory authorities to coordinate with the AI Office in cases of widespread infringement affecting over 45 million people across multiple Member States.

As a focal point for civil society and expert institutions, the Parliament addressed emerging concerns such as deepfakes, providing a clear definition and embedding safeguards through

peer-reviewed amendments. It expanded the scope of high-risk AI to include applications in border management, surveillance, and migration forecasting, while affirming that such systems must not be used to circumvent international obligations under the 1951 Refugee Convention and its 1967 Protocol. The Parliament emphasized the principle of non-refoulement and the protection of legal pathways to the Union, reinforcing its commitment to human rights. It also introduced the category of “deployers” and outlined differentiated obligations based on risk levels, ensuring that AI governance remains both ethically grounded and operationally precise (European Parliament, 2023b).

Among the European Parliament’s key structural reforms was the creation of an “Artificial Intelligence Office” to oversee the implementation of the AI law (European Parliament, 2023b). While the Commission and Council of Ministers initially proposed a European AI Board with advisory functions, the Parliament advanced a dual-peer structure—establishing both the AI Board and the AI Office to ensure mutual oversight. This institutional design reflects the Parliament’s central role as a conduit between intergovernmental actors and civil society, embedding legal, ethical, and consumer perspectives into the regulatory framework. The Parliament also proposed a consultative forum within the AI Office to formally engage stakeholders, reinforcing its commitment to participatory governance. MEPs envisioned the AI Office as an independent body with legal personality, governed by a Management Board comprising Member States, the Commission, the European Data Protection Supervisor, the EU Agency for Fundamental Rights, and the EU Cybersecurity Agency (European Parliament, 2023b).

To strengthen cross-border enforcement, the Parliament called for each Member State to designate a national supervisory authority that would act independently and represent its country on the AI Office’s Management Board. This amendment addressed the limitations of the Commission’s original proposal, which relied solely on national competent authorities. The Parliament’s dual structure—combining the AI Office, its Management Board, national supervisory authorities, and a stakeholder Consultative Assembly—aims to ensure coherent implementation and robust oversight across the Union. If this framework proves insufficient, the Parliament suggested considering the establishment of a dedicated AI Agency to further enhance regulatory capacity (European Parliament, 2023b).

In parallel, the Parliament led efforts to embed ethical safeguards through mandatory fundamental rights impact assessments for high-risk AI systems. These assessments must detail the system’s purpose, scope, affected groups, legal compliance, and environmental impact, along with mitigation strategies. If risks cannot be adequately addressed, deployment must be halted and authorities notified. Deployers are also required to implement governance mechanisms such as human oversight and complaint handling, and large deployers must consult equality bodies and consumer protection agencies, allowing six weeks for feedback. Public authorities may be exempt in specific cases, but those covered by Article 51 must publish a summary of their assessment. The Parliament’s leadership in this area—working closely with NGOs, civil society, and legal experts—ensured that rights-based governance became a foundational principle of the EU AI law (European Parliament, 2023b).

6. European Parliament and the private sector reporting body

As artificial intelligence governance in the EU evolved, the European Parliament emerged not only as a legislative actor but as a deliberative platform for civil society, expert networks, and private sector reporting bodies. This section explores how the Parliament facilitated normative spillover from informal institutions—such as the AI for People Institute and European Digital Rights campaigns—into formal policymaking, embedding ethical oversight, algorithmic accountability, and rights-based safeguards into the AI regulatory framework. Through workshops, consultations, and party-led initiatives, the Parliament institutionalized peer review and multi-stakeholder dialogue, reinforcing its role as a conduit for bottom-up feedback and transnational norm diffusion in the governance of AI.

The AI for People Institute was launched in February 2018 as a research and policy project, and based on its consultations and reports to the European Parliament and the Commission, it essentially acted as a monitoring process that led to the “AI Law for Europe”, the world’s first AI regulation. The role of the European Parliament is crucial because it was the Parliament that stressed the importance of independent policymaking on AI to the Commission, that it addressed the ethical aspect, and that it was the reporting body for AI for people. “An Ethical Framework for AI for People for a Good AI Society: Opportunities, Risks, Principles and Recommendations” was presented to the European Parliament as a report in November 2018 and was fully endorsed by the High-Level Expert Group on AI.

The European Parliament played a pivotal role in this process: it not only stressed the need for independent policy-making in the field of AI, but also highlighted ethical concerns and served as the main venue for the important AI for the People report, “An Ethical Framework for a Good AI Society”, in November 2018. The full endorsement of this framework by the High-Level Expert Group on AI further demonstrates how informal expert opinions have been absorbed into formal EU policy-making. This dynamic – in which the Parliament acts as a platform for informal bodies to voice normative concerns – was equally evident in the case of European digital rights. During the controversial reform of EU copyright law in 2019, the European Digital Rights Organization and its partners mobilized civil society through campaigns such as “Save Your Internet”, challenging the use of automated upload filters as a tool of censorship (European Digital Rights, 2020). Despite strong opposition and procedural irregularities in the final vote, the European Parliament became a place for democratic competition, where NGOs, activists and digital rights advocates could publicly challenge regulatory proposals. This highlights the evolving role of the Parliament not only as a legislative body, but also as a deliberative arena for bottom-up feedback, peer review and normative recalibration – key features of experimentalist governance. The European Digital Rights campaign shows how civil society actors are using the Parliament to shape the ethical and rights-based contours of EU digital regulation. The Future of Science and Technology Panel and the Committee on Civil Liberties, Justice and Home Affairs of the European Parliament organized a workshop in March 2019 on “Is AI a human rights issue?” held to discuss and assess the effectiveness and adequacy of EU initiatives such as the High-Level Expert Group Guidelines and Parliament resolutions on AI at EU level from a human rights perspective

(European Parliamentary Research Service, 2019). The level of stakeholder participation was notable as the workshop participants represented a mix of government bodies, international organizations, private sector actors and civil society groups, reflecting a multi-sectorial approach to the governance of human-centered AI. Key participants included experts from the United Nations International Labor Organization and the European Union Agency for Fundamental Rights, alongside MEPs from different political groups. Civil society voices were heard from organizations such as Big Brother Watch and Access Now, while private and legal expertise was provided by firms such as New Square Chambers. Academic insights were provided by members of the EU's High-Level Expert Group on AI and universities such as Delft, leading to a rich dialogue on ethical, transparent and human rights AI policies. For example, Silke Carlo is a leading civil liberties advocate in the UK and director of Big Brother Watch, known for her work defending rights in the digital age. Previously, she served as Senior Advocacy Officer at Liberty, where she led initiatives on technology and human rights, including the legal challenge to the Investigatory Powers Act. Her background includes working with the Edward Snowden Defense Fund and supporting whistleblowers. Committed to protecting freedoms in the face of evolving technologies, Carlo focuses on issues such as surveillance, AI and online expression. She is also an information security coach and co-author of *Information Security for Journalists* (European Parliamentary Research Service, 2019). Therefore, it can be seen that the European Parliament, through such workshops, has acted to become a venue for the dissemination of broader civil society ideas and a spillover effect on AI governance.

The European Parliamentary Research Service also published a study in April 2019 entitled "A Governance Framework for Algorithmic Transparency and Accountability" (European Parliamentary Research Service, 2019b). This document provides a comprehensive analysis of how EU counter-terrorism policies are developed and implemented across member states. It provides a multi-layered assessment of governance mechanisms for algorithmic transparency and accountability. It examines market-based solutions, self-regulation, co-regulation and government intervention, concluding that demand-side and supply-side market strategies are largely ineffective. While companies and industry sectors have started to adopt self-regulatory approaches, these approaches are typically reactive and reputation-based. Co-regulation, together with the development of industry standards, retains its potential once stronger frameworks are in place. Government efforts such as public education, incentive research, legal frameworks and independent oversight bodies are also recommended, although the EU's general data regulation alone is not considered sufficient for effective oversight globally (European Parliamentary Research Service, 2019b).

Building on these governance gaps, the report outlines emerging proposals including third-party audits, strict liability approaches, participation in consumer protection and algorithmic impact assessment – particularly for public sector systems. The human rights dimension is emphasized, notably through the Toronto Declaration, and it frames algorithmic risks as rights-based concerns rather than purely ethical ones. With algorithmic technologies becoming more widely available, a coordinated international dialogue is essential. As a policy response, four key

paths are recommended: raising public awareness, improving accountability in public sector use, ensuring regulation and private sector accountability, and strengthening global cooperation (European Parliamentary Research Service, 2019b). It is therefore clear that the European Parliament plays a key role in the review, peer review and feedback exercise and has been a venue for the spillover of private, expert and civil society groups in the field of AI governance.

The peer review mechanism of the participants was crucial, as the European Commission, in its October 2020 report on the safety and liability implications of AI, the Internet of Things and robotics, identified the specific challenges posed by AI for existing liability rules, and it was the European Parliament that voted in 2020 on a legislative resolution by Axel Voss calling for the harmonization of the legal framework for civil liability claims and the imposition of an absolute liability regime on operators of high-risk AI systems (European Parliament, 2020). The proposal recommends that all high-risk AI systems be clearly and comprehensively identified in an annex to the Regulation, which, due to the rapid pace of technological change, should be reviewed at least every six months. To support this effort, the Commission is recommended to set up a standing committee composed of representatives of Member States and a balanced group of stakeholders – business leaders, researchers, consumer organizations and social scientists – such as the High-Level Expert Group on Artificial Intelligence. The committee stresses the importance of “inclusive consultation” during policy development and calls on the European Parliament and the Council to have “equal access to documents and meetings” when drafting delegated legislation (European Parliament, 2020). The regulation also proposes a system of “absolute liability” for operators of high-risk AI systems, holding them accountable for any physical or virtual damage caused by these systems. The annex specifies that the annex should cover all relevant AI systems and critical sectors and empowers the Commission to amend the list – adding, removing or redefining risk categories – if necessary, through delegated legislation. The definition of “significant non-material harm” has been clarified to include demonstrable personal or economic harm, and establishes a legal framework for AI accountability in a transparent and rights-based manner (European Parliament, 2020). It is clear that the European Parliament is striving to increase its role, particularly in fostering transparency and cooperation among all stakeholders, which has been effective in limiting the Commission’s role and increasing transparency in AI governance and Commission meetings.

The role of European parties is also important within the European Parliament, as exemplified by the largest party in the European Parliament, the European People’s Party, and its role in the European Parliament’s work on AI, notably in the establishment of the European Parliament’s Special Committee on AI in the Digital Age in 2020, as stated in the party’s May 2020 report. The conclusions of the EPP parliamentary group stressed that the group had successfully guided the Special Committee on AI in the Digital Age on the following issues: AI and the EU economy; the challenge of deploying AI to maximize its contribution to trade value and economic growth; defining the EU’s approach towards key partners and other third countries; and informing other MEPs about these outcomes. The European People’s Party emphasizes that through this parliamentary activity and peer review, it has succeeded in influencing the European Artificial

Intelligence Law that was being prepared by the Commission, as the Special Committee on Artificial Intelligence in the Digital Age laid the foundations for the vital safeguards of AI, and the parliamentary group discussed several measures to protect citizens in high-risk applications of AI, such as banks, schools and venues, and brought them into the realm of AI governance. The parliamentary group's efforts in supporting these positions have paid off, and its citizen-centric approach has had a major impact on the EU Artificial Intelligence Law, the world's first comprehensive law on AI (EPP Group, 2020).

The group highlights the key role of the EU in setting global standards, as the first bloc in the world to introduce an AI law, and stresses that the EU legal framework on AI can make Europe a global leader in this sector and should therefore be promoted worldwide, in cooperation with all international partners, while continuing a critical and ethically-based dialogue with third countries that have alternative governance models and standards on AI (EPP Group, 2020). The report underlines the strategic importance of AI in the global competition for technological leadership and economic growth. It argues that the development of AI offers significant economic potential for countries that effectively adopt and commercialize these technologies. A strong regulatory framework, political commitment and a mindset conducive to innovation are essential to ensure Europe's competitiveness. The health sector is identified as a priority for AI deployment, but it must be governed by strict ethical safeguards – privacy, transparency and fair access are key. The creation of a European health data space and its integration with high-performance computing are welcomed as important steps towards improving research, particularly for rare diseases and children. Furthermore, the report highlights the EU's dual goals: a digitally empowered Europe and a future in line with the Green Deal. Despite the potential of AI to support environmental planning and sustainability – such as monitoring pollution and optimizing resource use – only a handful of Member States have put it at the center of their climate strategies. To address this, the report advocates international cooperation on ethical AI, pointing to initiatives by the Organization for Economic Co-operation and Development, UNESCO, the Council of Europe and others as promising frameworks. Overall, the report calls for cross-sectoral cooperation, ethical oversight and strategic planning to ensure AI's meaningful contribution to health, sustainability and global standards (EPP Group, 2020). Therefore, the importance of global competitiveness and the EU's leadership in creating AI legislation after the uncertainties related to the technology were of interest to this party group.

The Renew Europe parliamentary group, a moderate, liberal and pro-European political group, was formed in the 9th European Parliament in 2019. The group's position paper outlines a vision for AI governance rooted in privacy, ethics and democratic oversight. In January 2020, the group called on the European Commission to respect the principles of the General Data Protection Regulation, including data subject consent, transparency and limitations on profiling and indefinite data retention. To embed ethics throughout the AI lifecycle, the Commission was asked to assess algorithmic bias and propose "risk-based sectoral standards" (Renew Europe, 2020). It should also create mechanisms that require manufacturers to anticipate abuse, record operational data, and implement clear ethical safeguards that are in line with European

fundamental rights. The group argues that these regulatory structures ensure competitive fairness while protecting citizens in both the private and public spheres (Renew Europe, 2020).

Specifically in the public sector, the group calls for stricter restrictions before deploying AI – especially technologies that impact law enforcement, justice and surveillance. The Commission should set global ethical standards, extend the powers of the EU Agency for Law Enforcement Training to AI training, and require human oversight, impact assessments and appeal mechanisms for all public AI decisions. Further recommendations include certification systems for high-risk AI, greater transparency on algorithmic personalization and sector-specific rules for sensitive applications such as healthcare or credit scoring. On elections, the plan calls for strong regulatory measures to prevent interference and manipulation using AI, and establishes the EU as a global standard-setter in defending democratic integrity (Renew Europe, 2020).

This center-left parliamentary group calls for strong institutional oversight to foster public trust in AI systems and recommends that existing agencies such as ENISA take on the task of auditing, certifying and enforcing compliance with AI technologies that impact fundamental rights. These bodies should be empowered to act swiftly on infringements, provide technical explanations for decisions and coordinate with national counterparts – without compromising commercially sensitive data – while complementing, not replacing, legal jurisdictions. In parallel, the group stresses the need to create a digital single market for AI, arguing that coordination across member states would prevent fragmentation, increase consumer protection and enable European companies to innovate and compete on the global stage (Renew Europe, 2020).

Therefore, it is clear that the review and peer review of parliamentary groups also played an important role in the governance of AI and, in fact, the European Parliament became an important place for the spillover effect and freezing of partisan and civic ideas, especially in relation to the human-centered and ethical governance of AI, which has always emphasized the importance of the social sphere in contrast to the initial view of the Commission, which emphasized more on building the single market and the digital economy, and played an important role in this experimentalist governance.

The contributions of parliamentary groups such as Renew Europe further illustrate the European Parliament's evolving role as a site of normative contestation and regulatory innovation. By advocating for rights-based safeguards, sectorial standards, and institutional oversight, these groups have embedded ethical pluralism and democratic accountability into the AI governance debate. Their emphasis on transparency, human oversight, and electoral integrity reflects a broader shift from market-centric regulation toward socially grounded policymaking. In this context, the Parliament functions as a crucible for peer review and spillover—where partisan, civic, and expert inputs are not only debated but structurally absorbed into EU digital law. This dynamic confirms the Parliament's centrality in experimentalist governance: a space where normative recalibration, stakeholder engagement, and transnational coordination shape the ethical trajectory of AI in Europe.

7. Trilateral tensions and structural synthesis: cyclical governance models of foundational models in the EU

The final phase of trilogue negotiations in late 2023 exposed the deeply contested and iterative nature of EU AI governance, particularly in regulating foundational models. This section examines how the European Parliament's push for horizontal transparency collided with the Council's intergovernmental resistance and the Commission's tiered compromise, resulting in a hybrid framework shaped by lobbying pressures, institutional recalibration, and strategic ambiguity. Rather than a linear progression, the governance of foundational models unfolded as a cyclical process—where no single actor or stage dominates, and regulation emerges through adaptive synthesis across multiple levels. By tracing these tensions and their resolution, this section reveals how experimentalist governance operates in practice: through dynamic rule discovery, negotiated legitimacy, and the balancing of democratic ambition with market innovation.

The final phase of the trilogue negotiations in late 2023 underscored the European Parliament's central role in shaping the contested and iterative trajectory of EU AI governance, particularly regarding foundational models. The Parliament's insistence on horizontal transparency clashed with the Council's intergovernmental resistance—driven by national champions such as Mistral and Alpha Alpha—yet ultimately led to a compromise that blended multi-stage, risk-based oversight with baseline transparency obligations. This convergence, shaped by lobbying pressures, institutional recalibration, and strategic ambiguity, reflects the cyclical logic of experimentalist governance long championed by the Parliament: regulation emerges not from a single dominant actor but through iterative negotiation, multi-level coordination, and adaptive synthesis. In this dynamic, the Parliament helped position the EU as a regulatory pioneer and a site of normative rule discovery, where democratic legitimacy, market innovation, and ethical ambition are continuously balanced.

Throughout the trilogue process involving the Council of Ministers, the Commission, and the European Parliament—culminating in the December session—the Parliament's reform proposals were consistently pitted against the Council's intergovernmentalist stance, particularly that of France and Germany. Despite these tensions, negotiators reached agreement on the regulation of foundational models and interim conditions for general-purpose AI systems. According to the document, the European Commission will maintain a list of AI models deemed to pose a “systemic risk,” while general AI providers must publish detailed summaries of the training data used (Bertuzzi, 2023). The AI law, a landmark bill grounded in a risk-based approach, neared finalization during trilogue meetings on 10 December 2023. The intensity of disagreement was such that Members of the European Parliament (MEPs) temporarily walked out of negotiations over foundational model regulation. At the 10 November technical meeting, several major EU countries—including France and Germany—called for the Parliament's proposed regulatory approach to be scrapped, citing concerns from domestic startups like Mistral that feared the law would stifle innovation (Bertuzzi, 2023). Nonetheless, the Parliament's June amendment introduced a horizontal regulatory framework for foundational models (European Parliament, 2023b), applying uniform rules regardless of scale or risk. These included obligations for data documentation, model capability disclosures, and pre-deployment assessments. Although the

Commission's tiered approach—introduced at the 24 October tripartite meeting—did not fully align with the Parliament's horizontal vision, it represented a partial convergence. The tiered model imposed stricter obligations on the most powerful providers, primarily non-European firms. Still, opposition from Germany, France, and Italy persisted, with their joint 2023 document advocating “mandatory self-regulation” and the use of model cards to enhance transparency (Thoms, 2023).

The push for mandatory self-regulation by France, Germany, and Italy extended to all AI companies, regardless of size. Within the Council of Ministers' Working Party on Telecommunications and Information Society—now a powerful intergovernmental actor—ministers from these countries resisted any binding regulation of foundational models. Mistral, a French AI startup, led lobbying efforts against the Parliament's proposals, with former digital minister Cédric O arguing that the AI law could “kill” the company (Bertuzzi, 2023). Germany faced similar pressure from Alpha Alpha, whose close ties to government officials raised concerns about regulatory capture. These companies feared that EU regulations would disadvantage them relative to American and Chinese competitors. Despite efforts by the Spanish presidency to broker consensus with the Parliament, strong national resistance led Spain to propose a general review of foundational model status. Although the Commission initially supported a multi-stage regulatory approach, it refrained from defending it during the technical session. As one parliamentary official noted, “The ball is now in the Council's court to make a proposal,” highlighting the Parliament's persistent role in pushing for structured oversight amid intergovernmental hesitation (Bertuzzi, 2023).

Finally, a political agreement was reached between the European Parliament, the Council of Ministers, and the European Commission during the December 2023 trilogue, marking a pivotal moment in the institutional shaping of the AI law (European Commission, 2023). The compromise reflected the Parliament's sustained advocacy for horizontal oversight and transparency in the regulation of general-purpose AI models, which was ultimately merged with the Commission's and Council's preference for a tiered, risk-based framework. The resulting legislation introduces specific rules for general-purpose AI models, ensuring transparency across the entire value chain. For highly capable models that may pose systemic risks, the Parliament succeeded in embedding binding obligations for risk management, incident monitoring, model evaluation, and adversarial testing (European Commission, 2023). These obligations will be operationalized through practical codes co-developed by industry, civil society, and scientific stakeholders—an approach long championed by the Parliament to ensure inclusive and accountable governance. In terms of institutional architecture, the Parliament's vision of coordinated oversight was partially realized through the creation of a European AI Office within the Commission, complemented by strengthened national market surveillance authorities—a concession to the Council's intergovernmental stance. Together, these bodies will enforce the new rules, with the AI Office expected to become a global reference point. Crucially, a panel of independent experts—another element aligned with the Parliament's emphasis on democratic legitimacy and systemic risk monitoring—will support the classification and testing of general-purpose AI models (European Commission, 2023).

From the vantage point of the European Parliament, experimentalist governance in the EU AI regulatory process does not follow a linear trajectory but unfolds through a cyclical dynamic in which all institutional actors—public, private, elite, and transnational—interact iteratively across stages of policy formation. While the Council of Heads of State may initiate broad strategic goals, it is the Parliament that functions as the focal node within this governance cycle, leveraging its democratic legitimacy and deep engagement with legal, civil, and expert institutions to mediate between the Commission and the Council of Ministers. By institutionalizing stakeholder feedback, peer review, and normative recalibration, the Parliament acts as a transmission belt that channels societal concerns into formal policymaking. This cyclical structure allows for fluidity and adaptive synthesis, enabling legislation to emerge not from top-down mandates but through recursive negotiation—where the Parliament’s central role shown in Table 1.

Table 1. Cyclical Governance Structure of the EU AI Law with Parliament as Focal Node

Governance Phase	Key Institutional Dynamics	European Parliament’s Role
1. Strategic Initiation	Council of Heads of State identifies broad goals for AI governance.	Parliament begins informal engagement through workshops and committee discussions, anticipating normative concerns.
2. Informal Coordination (Soft Law)	Commission activates expert bodies (e.g. High-Level Expert Group); Council’s Telecoms Working Party negotiates intergovernmental positions.	Parliament hosts stakeholder forums and civil society consultations, embedding ethical and legal perspectives early.
3. Peer Review and Normative Recalibration	Feedback loops between formal institutions and expert networks refine definitions, goals, and procedures.	Parliament institutionalizes peer review, channels societal input, and proposes amendments reflecting democratic values.
4. Re-definition and Experimental Adjustment	Focus shifts to foundational models, regulatory sandboxes, and fundamental rights assessments.	Parliament advocates horizontal transparency and rights-based safeguards, shaping the scope and ethical framing.
5. Problem Recognition and Structural Synthesis	Governance challenges (e.g. opacity, risk differentiation, self-regulation limits) are clarified through trilogue tensions.	Parliament mediates between Commission and Council, pushing for binding obligations and inclusive oversight mechanisms.
6. Legal Formalization (Hard Law)	AI law adopted via trilogue compromise; Commission and Council embed tiered risk-based rules and national oversight.	Parliament secures horizontal obligations, independent expert panels, and the creation of the AI Office (European Commission, 2023).

Source: Authors’ conceptual synthesis of EU experimentalist AI governance

8. The final stage of the AI law: making the law binding through recursive design

The final text of the AI law, adopted in January 2024, marks the culmination of a recursive governance process in which the European Parliament played a central role in transforming soft coordination into binding legal authority. The compromise agreement—reached through trilogue negotiations—reflects a hybrid architecture shaped by the Parliament’s insistence on horizontal transparency for all general-purpose AI models, layered with stricter obligations for those deemed systemically risky (Council of the European Union, 2024). Through repeated amendments, stakeholder engagement, and inter-institutional synthesis, the Parliament helped embed empirical mechanisms such as model documentation, scientific advisory panels, and national oversight into enforceable norms, operationalizing the EU’s risk-based approach while preserving adaptive accountability.

The final provisions on general-purpose AI models closely mirror the Parliament’s June 2023 amendments, requiring providers to maintain up-to-date technical documentation, share relevant

materials with the AI Office and national authorities, and support downstream compliance (Council of the European Union, 2024). While horizontal regulation applies primarily to transparency, systemic models—those trained with massive computational resources—face additional obligations, including risk assessments, cyber security safeguards, and incident reporting. These layered requirements reflect the Parliament's commitment to democratic oversight and its role in shaping a dynamic regulatory cycle. Although the floating-point operation threshold for systemic classification was set at 10^{25} —higher than the Parliament's initial proposal but lower than the Council's mandate of 10^{26} —the Commission is required to adjust this threshold in response to technological developments, preserving the experimentalist logic of iterative recalibration (Council of the European Union, 2024).

The trilogue process itself, involving the Commission, Council of Ministers, and the European Parliament, served as a mechanism for smoothing institutional tensions and embedding compromise. The Parliament's influence is evident in the law's copyright provisions, which require providers to publish a general summary of training data while respecting trade secrets, and in the definition of general-purpose systems, which aligns closely with Parliament's framing (Council of the European Union, 2024). The governance structure also reflects a negotiated balance: while the AI Office—favored by the Parliament—will oversee implementation and coordinate enforcement, the AI Board—preferred by the Council—has been granted expanded tasks, including regulatory sandboxes and stakeholder consultations.

Importantly, the final text preserves the Parliament's reformed oversight architecture by introducing two new advisory bodies. A scientific panel of independent experts will advise the AI Office and national authorities, issue qualified warnings on systemic risks, and support enforcement activities. Member States may also draw on these experts for market surveillance, reinforcing the Parliament's vision of distributed, expert-informed governance (Council of the European Union, 2024). In this way, the AI law institutionalizes a recursive design that blends legal bindingness with experimentalist flexibility—anchored by the Parliament's democratic legitimacy and its role as a transmission belt between civil society, expert networks, and EU institutions.

The final text of the AI law reflects the European Parliament's sustained influence in embedding stakeholder participation, transparency, and rights-based safeguards into binding regulation. A consultative forum—mirroring the Parliament's amendment—will provide the Commission and AI Office with stakeholder input, reinforcing the Parliament's commitment to inclusive governance. While the Council emphasized national competences, the Parliament ensured that national authorities and market surveillance bodies are empowered to demand documentation, assess compliance, and intervene in cases of risk or non-conformity (Council of the European Union, 2024). The Parliament also secured exemptions for free and open-source software, ensuring that while such tools are excluded from certain obligations, they must still respect copyright and transparency norms. Developers are encouraged to adopt documentation practices like model cards and data sheets, promoting trustworthy AI across the value chain. The Parliament's amendment to the definition of AI systems in Article 3(1),

aligned with OECD standards, further illustrates its role as a focal point for transnational compromise and normative legitimacy (Council of the European Union, 2024).

On prohibited uses, the Parliament's human rights perspective shaped the final list, which includes bans on real-time biometric identification in public spaces, emotion recognition in schools and workplaces, and predictive policing based solely on personality traits. While exceptions remain—particularly for law enforcement—the Parliament ensured that safeguards and monitoring mechanisms were introduced. National security remains excluded from the regulation's scope, reflecting Member State prerogatives under Article 4(2) of the Treaty on European Union. However, the Parliament's legal and ethical concerns were partially addressed: if AI systems originally developed for military or security purposes are repurposed for civilian or public use, they fall within the regulation's scope. To balance broad exemptions, the Parliament secured oversight mechanisms, requiring data protection authorities or designated bodies under the Law Enforcement Directive to monitor law enforcement AI systems (Council of the European Union, 2024).

The Parliament also pushed for meaningful reflection on fundamental rights in sensitive sectors. While the Council resisted extensive assessment obligations, citing burdens on small public bodies, the compromise—guided by Parliament's proposals—requires a streamlined fundamental rights impact assessment for public entities, private actors delivering public services, and high-risk use cases. These assessments are limited to aspects not already covered by existing legal frameworks, such as GDPR-related data protection impact assessments, and will be supported by a standardized questionnaire developed by the AI Office (Council of the European Union, 2024). Ultimately, the Parliament's role in reducing strategic uncertainty and institutionalizing adaptive safeguards confirms its centrality in the EU's experimentalist governance cycle, as illustrated in Figure 1.

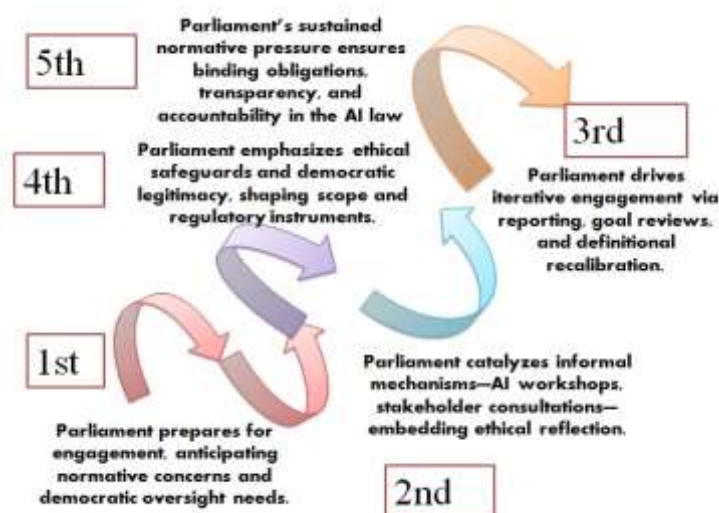


Figure 1. EU AI Governance Cycle: Institutional Roles and Parliament's Central Function

Source: Authors' conceptual synthesis of EU experimentalist AI governance

As illustrated in Figure 1, the initial step in the EU's AI governance cycle began with a shared recognition among Member States—particularly within the Council of Heads of State—of the need for coordinated action. However, it was the European Parliament that catalyzed the

second phase through informal mechanisms outside the EU treaties, including AI workshops and stakeholder consultations that complemented negotiations in the Telecommunications Working Party of the Council of Ministers and the High-Level Expert Group on AI under the Commission. These parliamentary initiatives helped embed soft law instruments and fostered a deliberative space for normative reflection. In the third phase, the Parliament played a pivotal role in adapting both legal and informal frameworks through peer review processes, facilitating feedback loops between formal institutions and expert networks. This iterative engagement—driven by parliamentary reporting, periodic review of goals, and definitional recalibration—enabled the setting of shared objectives and procedural standards.

In the fourth phase, the Parliament's emphasis on ethical safeguards and democratic legitimacy shaped the redefinition of collaborative priorities, including the regulation of foundational models, the development of AI sandboxes, and the assessment of fundamental rights impacts. These refinements contributed to a deeper institutional understanding of AI governance challenges—such as opacity in text-based systems, limitations of self-regulation, and differentiated risk profiles across AI applications. Ultimately, despite the hierarchical complexity of the Council of Ministers and the Commission, it was the Parliament's sustained normative pressure and stakeholder engagement that helped formalize and legalize governance procedures. The adoption of the AI law thus reflects a hardening of experimentalist governance into treaty-based authority, safeguarding transparency and accountability against potential national resistance—especially in algorithmic oversight.

As shown in Table 2, this empirical governance trajectory reveals a convergence toward the European Community method, with the Parliament anchoring the transition through democratic deliberation, legal innovation, and transnational norm diffusion. Changes in the Union treaties now reflect this evolution, positioning the Parliament as a central actor in shaping the future of AI regulation in Europe.

Table 2. Mechanism of AI Governance Toward the European Community Method

Institutional Actor	Governance Orientation	Key Mechanisms and Contributions	Role of the European Parliament
Council of Ministers	Intergovernmental method: upward governance reinforcing national interests	Led by the Telecommunications Working Group; emphasized Member State control and national sovereignty	Parliament mediated between national interests and EU-wide norms, ensuring democratic accountability and transparency
European Commission	Supranational method: expanding Union-level institutional authority	Activated oversight bodies like the AI Observatory; supported expert-led governance (e.g. High-Level Expert Group, 2018)	Parliament translated expert input into legislative proposals, anchoring supranational ambitions in democratic process
European Parliament	Community method: convergence through democratic deliberation, legal innovation, and norm diffusion	Committees (IMCO, LIBE) and stakeholder workshops integrated civil, legal, and ethical perspectives	Served as power transmission belt; introduced key reforms in 2023 amendment adopted in final AI law
Outcome	Transition from fragmented governance to treaty-based legal authority	Changes in Union treaties reflect convergence toward the European Community method	Parliament positioned as central actor shaping the future of AI regulation in Europe

Source: Authors' conceptual synthesis of EU experimentalist AI governance

As is clear, the Council of Ministers, representing the intergovernmental method, consistently pushed governance upward by reinforcing the role and interests of national

governments, with the Telecommunications Working Group playing a decisive role in this regard. In contrast, the European Commission—particularly through the High-Level Expert Group on AI in 2018—sought to expand its supranational institutional influence by deploying oversight mechanisms such as the AI Observatory. Yet it was the European Parliament that served as the connective and driving force between these institutional poles. Through the active engagement of the Committee on the Internal Market and Consumer Protection and the Committee on Civil Liberties, Justice and Home Affairs, as well as through parliamentary workshops involving legal, civil, and ethical stakeholders, the Parliament acted as a power transmission belt—translating normative concerns into legislative momentum. Ultimately, in the transition toward binding regulation, it was the Parliament that introduced key reforms in its 2023 amendment, many of which were incorporated into the final text of the EU AI law.

Conclusion

The evolution of the EU AI Act exemplifies a shift from fragmented, intergovernmental coordination toward a recursive and experimentalist model of governance, in which the European Parliament has emerged as a central actor. Rather than functioning as a passive legislative chamber, the Parliament actively shaped the trajectory of AI regulation through amendments, stakeholder engagement, and institutional innovation. Its role as a transmission belt—connecting civil society, expert networks, and formal institutions—enabled the integration of ethical safeguards, transparency obligations, and rights-based governance into the final text of the law. Throughout the trilogue process, the Parliament consistently advocated for horizontal regulation of general-purpose AI models, resisting pressures from national governments and industry lobbies that sought to dilute oversight. By embedding transparency requirements, risk mitigation protocols, and public documentation standards, the Parliament ensured that foundational models like ChatGPT would be subject to proportionate and enforceable obligations. These interventions reflect the Parliament's commitment to democratic legitimacy and its capacity to translate normative concerns into binding legal frameworks.

Institutionally, the Parliament's proposal to establish both an AI Office and a consultative stakeholder forum marked a significant structural reform. This dual architecture—complemented by national supervisory authorities and a Management Board—embodies the recursive logic of experimentalist governance, where oversight is distributed, adaptive, and informed by peer review. The Parliament's insistence on independent enforcement, stakeholder participation, and cross-border coordination has laid the groundwork for a resilient and accountable regulatory ecosystem. Equally important was the Parliament's leadership in embedding fundamental rights impact assessments into the deployment of high-risk AI systems. By mandating human oversight, complaint mechanisms, and stakeholder consultation, the Parliament reinforced the ethical foundations of the AI law. Its amendments on deepfakes, migration technologies, and predictive policing further demonstrate its responsiveness to civil society concerns and its role in safeguarding human dignity within digital governance.

The European Parliament's role in shaping the AI Act offers transferable lessons for regulating other emerging technologies, from climate-tech and neurotechnology to quantum computing. The “transmission belt” function—whereby a legislative chamber systematically

channels civil-society, expert, and institutional input into binding amendments—can be replicated by mandating early, structured stakeholder consultations and multi-committee deliberation before the Commission tables a formal proposal. Embedding such pre-legislative engagement in interinstitutional agreements would strengthen democratic legitimacy across regulatory domains.

The preservation of the AI Office's independence remains a live concern. As implementation proceeds, the Office's dual accountability—to the Commission administratively and to the Parliament and Council politically—could create tensions that dilute its oversight capacity. To safeguard the adaptive oversight model described in this study, the Parliament should use its budgetary and scrutiny powers to insist on transparent public reporting by the Office, regular hearings in the responsible committees, and a formal role in the appointment of the Scientific Panel's independent experts. Early stakeholder engagement proved decisive in embedding rights-based safeguards into the AI Act. Policymakers should institutionalise this practice by creating a permanent, procedurally defined consultative forum for each major digital regulation, with clear feedback loops to the legislative process. This would prevent ad-hoc lobbying from dominating agenda-setting and ensure that civil-society voices are heard before political positions harden in trilogue negotiations.

Finally, the recursive character of experimentalist governance depends on periodic review clauses that are legally binding and not merely declaratory. The AI Act already mandates the Commission to adjust certain thresholds, but the Parliament should insist that any future review be accompanied by a formal parliamentary resolution and, where necessary, a co-legislative revision procedure. This would ensure that the governance framework evolves in step with technological change while remaining anchored in democratic accountability. In sum, the European Parliament has not only shaped the content of the AI law but also redefined the procedural and normative architecture of EU digital regulation. Its strategic interventions, institutional reforms, and normative framing illustrate how experimentalist governance can be operationalized through democratic institutions. As the AI law enters its implementation phase, the Parliament's role will remain pivotal in ensuring that the regulation evolves in step with technological innovation, societal values, and the Union's commitment to rights-based governance.

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