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Negotiating the EU AI Act: Divergent National Positions in France and Germany

verfasst von | submitted by

Azar Haziyeu

angestrebter akademischer Grad | in partial fulfilment of the requirements for the degree of

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Abstract

This thesis explores how France and Germany influenced the Union's European Artificial Intelligence Act (AI Act) and why these two similarly ambitious member states adopted different regulatory priorities. The research combines historical institutionalism, varieties of capitalism, digital sovereignty, techno-nationalism, and differentiated integration to explain preference formation and bargaining. It uses a qualitative comparative method that analyzes EU legislative texts, national strategies, and public statements.

The findings suggest that France's centralized state tradition and strategic-autonomy narrative propelled a proactive, innovation-driven approach, particularly regarding general-purpose and foundation models designed to cultivate European champions and lessen external dependencies. Germany's coordinated market economy, federal structure, and ethics-oriented discussions fostered a prudent risk management approach. This approach underscored legal clarity, accountability, and proportionality for high-risk applications.

From the Commission's 2021 proposal, through the 2023 trilogues, to adoption in 2024, the analysis tracks the legislative process. It shows how Franco-German disputes over GPAI scope and biometric safeguards yielded a hybrid, tiered framework with targeted bans, strict duties for high-risk systems, and transparency for limited-risk uses.

Diese Masterarbeit untersucht, wie Frankreich und Deutschland die Ausgestaltung der europäischen Verordnung über Künstliche Intelligenz (EU-AI Act) beeinflusst haben und weshalb zwei politisch ähnlich ambitionierte Mitgliedstaaten unterschiedliche regulatorische Prioritäten entwickelten. Die Studie kombiniert den historischen Institutionalismus, die Theorie der Variationen des Kapitalismus, Konzepte der digitalen Souveränität, des Techno-Nationalismus sowie der differenzierten Integration, um Prozesse der Präferenzbildung und Aushandlung zu erklären. Methodisch folgt sie einem qualitativ-vergleichenden Ansatz und analysiert hierzu EU-Rechtsakte, nationale Strategiepapiere sowie öffentliche Stellungnahmen.

Die Ergebnisse deuten darauf hin, dass Frankreichs zentralstaatliche Tradition und das Narrativ strategischer Autonomie eine proaktive, innovationsorientierte Linie begünstigten, insbesondere in Bezug auf KI-Systeme mit allgemeinem Verwendungszweck (GPAI) und Basismodelle mit dem Ziel, europäische “Champions“ zu fördern und externe Abhängigkeiten zu verringern. Die koordinierte Marktwirtschaft Deutschlands, seine föderale Struktur und ein ethikorientierter Diskurs begünstigten einen vorsichtigen Risikomanagementansatz. Dieser Ansatz unterstrich rechtliche Klarheit, Rechenschaftspflicht und Verhältnismäßigkeit bei Hochrisikoanwendungen.

Von dem Vorschlag der Europäischen Kommission 2021 über die Trilogie 2023 bis zur Annahme im Jahr 2024 verfolgt die Analyse den Gesetzgebungsprozess. Sie zeigt, wie deutsch-französische Streitigkeiten über den Geltungsbereich von GPAI und biometrische Schutzmaßnahmen in ein hybrides, gestuftes Rahmenwerk mündeten, das gezielte Verbote, strenge Pflichten für Hochrisikosysteme und Transparenzanforderungen für Anwendungen mit begrenztem Risiko integriert.

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Chapter 1: Introduction

The policies, inventions, and practices that pertain to artificial intelligence (AI) are growing at a velocity that is just staggering. In artificial intelligence, normative and regulatory frameworks are lagging behind the rapid pace of technological advancements (Feldstein, 2024). The European Data Protection Board, together with the European Data Protection Supervisor, identifies this as a problem because the field faces fast technological progress (EDPB-EDPS, 2021). The European Union's AI policy focuses on digital sovereignty as a fundamental element for its policy framework. On the other hand, however, the fact that such "AI sovereignty" might be exploited for several purposes, some of which are even in opposition to one another, obscures the tensions that are included within the actual EU AI plan (Mügge, 2024). According to the 2022 AI Index Report by Stanford University, the amount of money that was invested by the private sector worldwide in the artificial intelligence business in 2021 alone was \$93.5 billion. This figure is twice as much as the amount that was invested in 2020 (Panagiotopoulos, 2023). Governments are also expanding their investments in this area, and they are doing so for a number of purposes, including those that are beneficial and those that are oppressive (The Economist, 2021).

As stated by Acemoğlu and Johnson (2023), AI creates distributional trade-offs. The main use of AI for automation and monitoring leads to capital owners and high-skill workers receiving most of the benefits, while routine/mid-skill workers and citizens who experience increased surveillance and manipulation bear the costs. According to Malmberg (2023), the rhetoric that is used to discuss the sovereignty of artificial intelligence obscures the actual political decisions. This raises a central question for the EU: "Which substantive political choices lie behind the European Union's ambition to achieve AI sovereignty?"(Mügge, 2024).

The Artificial Intelligence (AI) Act was signed into law by legislators from the European Union in June of 2024. It is the first international horizontal law on artificial intelligence that is legally enforceable. With the AI Act, the European Union has established a standard framework for AI system use and supply within its territory (Future of Life Institute, 2024). The new legislation adopts a 'risk-based approach' which establishes a system of artificial intelligence categorization with multiple standards and obligations (Cath et al., 2018). Certain artificial intelligence systems that pose hazards that are deemed "unacceptable" are restricted. There is a broad variety of artificial intelligence systems that are considered to be "high-risk", which constitute threats to human health, safety, and basic rights. These include social-scoring by government bodies, emotion-recognition in workplaces or schools, biometric categorization, etc. AI use in the recruitment process (CV screenings), in the management of the critical infrastructure, or in essential services such as credit scoring are some examples of high-risk activities. These systems are authorized, but to access the EU market, they are subject to a set of rules and duties (Future of Life Institute, 2024).

Standards for information and transparency will be applied to artificial intelligence systems that, owing to their lack of transparency, represent a limited risk. Systems that interact with people, such as chatbots, or those that may be used to alter material, such as deepfakes, are included in this category. Spam filters, for instance, are examples of artificial intelligence systems that will not be subject to any extra responsibilities since they represent only a little risk to human beings. General-purpose artificial intelligence (GPAI) models that have "high-impact capabilities", which might potentially constitute a systemic risk and have a significant impact on the internal market, are subject to requirements that are more stringent than those that are already in place (Gilboa, 2023).

Within the EU, France is positioning artificial intelligence (AI) as an essential component of its economic and technological policy. This has been done via the allocation of significant resources to research and development and the establishment of a collaborative ecosystem (Elysee, 2025). According to Krasavina (2023), France's national strategic plan has attempted to strike a balance between development and ethical considerations.

Similarly, Germany has taken steps to be at the forefront of the AI industry. ChatGPT-like models and responsive AI uses are the two most essential components that have been a concerning matter for the German government (Leboukh et al., 2023). Complexity of dual compliance, the lack of a clear understanding of “high-risk” AI categories, and the emergence of new versions of AI-related technologies are some of the major challenges in this regard. Germany has a preparation gap among various levels of industry for AI. The healthcare and government sectors are doing relatively well, but the finance and energy sectors still lag (Joswig & Kurz, 2000).

This study examines the political, economic, and institutional factors that influence national choices regarding AI governance and their impact on the policymaking process at the European Union level. Specifically, it focuses on French and German policy in the AI regulatory framework at the EU policy level.

The primary research question is:

- In what ways do the divergent perspectives of France and Germany on the Artificial Intelligence Act of the European Union signal more fundamental issues in the digital legislation of the European Union that exist between fostering innovation and ensuring the safety of individuals?

In addition, there are the following sub-questions:

- Given that France and Germany have different national policies and various duties in the process of negotiating with the European Union, what are the most important differences between the artificial intelligence laws that France and Germany have?
- When it comes to the purpose of the European Union, which is to build a single body of rules that control artificial intelligence, what are the consequences of these points of view?
- Is there a distinction between the federalist system in Germany and the centralized government in France in terms of how the institutional structures influence the method in which regulations are made?
- What are some ways in which discursive narratives, such as "strategic autonomy" in France and "ethical AI" in Germany, contribute to the perception that certain points of view are more credible?

1.1 Significance of the Study

The advancement of artificial intelligence (AI) through better data availability and computer capacity has led to its widespread implementation across education and security domains as well

as healthcare and social services (Coeckelbergh, 2020). New developments and uses of artificial intelligence have spurred huge public debates regarding the advantages and drawbacks associated with the development and implementation of AI. It is also important to note that the advancement of artificial intelligence technology has led to major concerns about power concentration, societal disparities, and prejudice (Broussard, 2018). These concerns persist despite the widespread expectation that AI will generate substantial societal and economic benefits. According to Rein and Schon (1996), the public discourse that surrounds artificial intelligence frequently focuses on ethics. Hence, the development of ethical standards through rules is considered essential for reducing risks and enhancing benefits related to artificial intelligence, according to the ethics framework. Over the recent few years, governments together with corporations and international organizations, and other organizations worldwide have strongly implemented ethical standards which focus on openness and privacy and justice, and fairness (Floridi et al., 2018).

In the realm of artificial intelligence (AI), France is enjoying a period of tremendous technological advancement as a result of sustained innovation dynamics, the world's top-level talents, record funding, and the establishment of key international players (Elysee, 2025). On the other hand, artificial intelligence (AI) is a crucial technology that possesses significant potential for enhancing economic growth and productivity gains in Germany. The Federal Government of Germany has devised a framework for action and taken far-reaching measures as part of its Artificial Intelligence Strategy (AI Strategy) in order to promote the use of this potential. These actions contribute to the formation of a comprehensive strategy in Germany for the responsible research, development, and practical use of artificial intelligence for the benefit of the country's population and the

environment (Bulmer and Paterson, 2018). Both active policymaking and a wide social conversation require more understanding of regulation and positioning as an AI leader in the EU.

1.2 The EU AI Act: Background, Purpose, and Political Significance

The economic and financial crisis that has been plaguing the European Union has thrown the political significance of the control of digital markets into the forefront. Justo-Hanani (2022) states that in the Artificial Intelligence (AI) sector, which is thought to be able to stimulate economic prosperity and the creation of new jobs if it is well managed, the development of AI applications had to be complemented by a shift in regulatory policies. There is a high probability that artificial intelligence will not be ephemeral due to the highly resilient and quick growth of four themes that reinforce themselves: advanced statistical and probabilistic methodologies; huge volumes of data; inexpensive and enormous computer power; and the transformation of locations into surroundings that are hospitable to information technology (for example, domestics and smart cities) (Gilboa, 2023). Consequently, there has been a growing worry over the influence that artificial intelligence (AI) is having on our society, as well as the question of who should be accountable for ensuring that AI will serve a beneficial force in the future (Cath et al., 2018).

The fight for artificial intelligence (AI) dominance on a global scale has never been more heated or geopolitically challenged. China is rapidly mobilizing substantial resources and introducing new artificial intelligence models. At the same time, the United States is strongly advocating for a deregulated, market-oriented agenda, as illustrated by the disruptive rhetoric of actors such as Elon Musk (Csernaton, 2025). It also significantly forces the power of political gain in AI regulation.

While the tech giants' owners and lobbyists are trying to influence the regulation process, the EU is trying to tighten its grip and implement more citizen-oriented decision-making.

Debates on the EU's role in global AI governance oscillate between two views: the EU as a regulatory power whose rules diffuse extraterritorially (the "Brussels Effect") (Bradford, 2020) and concerns that rulemaking without commensurate enforcement capacity and industrial investment may limit global uptake and competitiveness (Csernaton, 2025). Legitimacy of the legislation and the European Union's goals to be the world's leader in the development of AI technologies that are both safe and dependable are at risk. As stated by Haeck and Coi (2024), there are experts who believe that the European Union (EU) has slipped behind the innovation curve due to the fact that it has adopted a regulatory conservatism. This has also delayed the scaling up of artificial intelligence start-ups, which might create significant dependencies on foreign technology and resources. Some critics take different positions on the legislative process of the AI Act, arguing that such intervention in AI will hamper the pace of innovation. While AI investment and innovation are outpacing other non-EU countries, it's discouraging investors' enthusiasm for AI innovation and creating a fragmented market within and outside the EU (Letta, 2024).

The process, which started in 2020 and finished with official publication in 2024, required extensive work from the European Commission and European Parliament, and Council of the European Union to handle multiple proposals and amendments, and negotiations (Council of the European Union, 2022). With the approval of the European Union's Artificial Intelligence Act (EU AI Act), the world is witnessing the first comprehensive AI regulation. It's not only for EU states,

but also for non-EU states that want to access the EU market. This poses a challenge to the general ethics of AI as well as the citizen-focused rights-based approach. The legislation is attempting to be implemented by the EU in order to safeguard and compel other parties to play by the rules.

The European Commission published its White Paper on Artificial Intelligence through "A European approach to excellence and trust," which became available on February 19, 2020. The document initiated a public discussion to receive feedback from citizens and stakeholders, which included governments, companies, civil society organizations, and academic experts regarding AI development approaches that achieve progress while controlling risks (The European Commission, 2020). The survey collected more than 1200 responses, which demonstrated widespread backing for regulatory oversight and risk-based management systems (Council of the European Union, 2022).

Through the consultation process and preparatory work, the European Commission was able to draft the proposal for the Artificial Intelligence Act. The Commission also received guidance from the High-Level Expert Group on Artificial Intelligence (HLEG) and the AI Alliance. The European Commission issued its initial proposal for the Artificial Intelligence Act on April 21, 2021, following the completion of this consultation and preliminary work (Future of Life Institute, 2024b). The plan had several basic goals. The most important ones were the elimination of market fragmentation, the development of governance and enforcement systems, and the establishment of legal stability for investments and innovation. Additionally, the proposal intended to guarantee that artificial intelligence systems operating within the Union conform to safety regulations while also

preserving fundamental rights and EU values. It called for the utilization of risk-based classification in order to divide artificial intelligence systems into four distinct categories. The unacceptable risk, which was referred to as "banned," the high risk, which was defined by harsh limitations, the limited risk, which was characterized by transparency requirements, and the low risk, which was characterized by voluntary codes of behavior, were the categories that were included in this classification (The European Parliament, 2025).

As a consequence of the recommendation made by the Commission, the legislative procedure was taken up by both the European Parliament and the Council of the European Union. The united position that was agreed upon by the Council of the European Union on December 6th, 2022, was referred to as the "general approach". The European Council of the European Union (2025) asserts that the position was published with the purpose of ensuring the protection of fundamental rights in order to advance the safety of artificial intelligence. The French and Czech presidencies, together with other member states, distributed compromise documents that presented their main goals and regulatory frameworks for general-purpose AI systems throughout this year (Future of Life Institute, 2025).

Concurrently, the European Parliament continued its activities at the same time. Its Internal Market (IMCO) and Civil Liberties (LIBE) committees were jointly appointed for negotiations on 1 December 2021, with Brando Benifei and Dragoș Tudorache as co-rapporteurs. By April 2022, a draft report had been made public. A couple of months later, in June, a staggering number of amendments had already flooded in. Thousands of them were submitted by political groups. On June 14, 2023, the European Parliament settled on its stance for negotiations with a clear majority.

499 Members voted in favor, while 28 were opposed and 93 chose to abstain (Future of Life Institute, 2025). The Parliament established its main objectives to guarantee AI systems operate with safety features and transparency and traceability, non-discrimination, and environmental sustainability while maintaining human supervision at all times (The European Parliament, 2025). The proposal endorsed a tech-agnostic definition of AI while demanding that developers of foundation models undergo third-party expert testing for all their models, regardless of application purpose (Nikiforov, 2023).

At the last stage, the European Commission, European Parliament, and Council conducted trilogue negotiations. The negotiations during 2023 became extremely active. The November 2023 period brought a major challenge when France, Germany, and Italy released their joint non-paper proposal to the public. The document advocated for a more adaptable framework of foundation models. It recommended that the AI Act should regulate AI applications instead of governing the technology directly (Ministry of Enterprises and Made in Italy, n.d.). The three EU member states supported mandatory self-regulation through conduct codes that followed G7 Hiroshima process principles, while they proposed model cards for model information, but exempted foundation model developers from immediate penalties until they demonstrated repeated non-compliance with conduct rules. The proposed change created a potential deadlock because it differed from the European Parliament's original position, which sought to establish mandatory conduct rules for major AI deployers (Nikiforov, 2023).

As a result, the EU institutions managed to establish a temporary political agreement regarding the AI Act through their mediation on December 9th, 2023, after multiple months of extensive negotiations (Gilchrist & Iordache, 2024). The agreement established a framework to unify AI system regulations, which would protect both user safety and fundamental rights (European Council of the European Union, 2025).

The legislative journey was nearing its end. By 13 February 2024, the Internal Market and Civil Liberties Committees had given their stamp of approval with 71 members voting in favor, 8 against, and 7 abstaining, thus backing the outcome of negotiations (Future of Life Institute, 2024b). The European Parliament gave its official backing to the Act through a vote on 13 March 2024 when 523 members supported it, while 46 members opposed it, and 49 members abstained (The European Parliament, 2024). The European Parliament President, Roberta Metsola, declared the act a groundbreaking achievement that protects fundamental rights while allowing technological progress and AI to become part of the EU legal framework. Thierry Breton, who serves as European Commissioner for Internal Market, announced that Europe has achieved global leadership status in AI standard-setting." (Gilchrist & Iordache, 2024). Following this, the European Council adopted the EU AI Act on 21 May 2024 (European Council of the European Union, 2025). The EU AI Act reached its ultimate phase when it became legally enforceable throughout all 27 EU member states following its publication in the Official Journal of the European Union on 12 July 2024. The Act became effective on August 1st, 2024 (The European Commission, 2024).

1.3 Structure of the Thesis

The thesis comprises six chapters. It takes a methodical comparison approach in order to investigate the different points of view that France and Germany have about the European Union Artificial Intelligence Act. The setting of the study and the significance of investigating national contestation in the European Union's regulation of artificial intelligence are all discussed in the introduction to Chapter 1. In the second chapter, which is titled "Literature Review," a critical analysis of the interactions between EU legislation and AI policy is presented. It suggests that our comprehension of the cooperation that exists between member nations is lacking in some fundamental respects. In the third chapter, the study will analyze the theoretical framework that utilizes notions from digital sovereignty, historical institutionalism, and diverse types of state mechanisms in order to shed light on the existence of different rules. The technique, which includes a qualitative case study of policy documents, EU negotiations, and language, is subject to discussion in Chapter 4 as methodology. A full analysis that is broken down by country is presented in Chapter 5. Furthermore, the rights-based policy of Germany and the innovation-centric strategy of France, as well as the comparative analysis, are explained. The conclusion can be found in Chapter 6. The chapter includes the findings, theoretical contributions, and policy recommendations of this study.

1.4 Ethical Considerations

In the course of the research, the author employed AI (particularly ChatGPT) to paraphrase and refine the grammar and language of the text. The author subsequently reviewed and revised the text. The author assumes all responsibility for the content. It is important to acknowledge that AI

was also utilised to extract some sources, particularly for Chapter 5. In addition, due to the author's restricted proficiency in German and French, AI was employed to translate the abstract from English to German and to translate relevant literature available in German and French throughout the research.

Chapter 2: Literature Review

Being a global "standard-setter" in the sphere of digital governance is becoming an increasingly important ambition for the EU. This is because of the rapid proliferation of technologies that make use of artificial intelligence, such as healthcare, finance, security, and public administration (Stix, 2021). Using a unified framework that achieves a balance between innovation and fundamental rights, the Commission has constructed the Act according to its principles.

Over the course of its history, France has consistently adhered to a policy that is distinguished by the exercise of state leadership and sovereignty. Pellerin-Carlin (2019) states that Macron's proposed strategy shows two main priorities: achieving strategic independence from Europe and developing technological autonomy. On the other hand, Germany has historically opted for a strategy that is more conservative and one that places a higher focus on industry. The ultimate purpose of this strategy is to retain Germany's *Mittelstand* and industrial base in a competitive position while also avoiding an excessive number of regulations (Stix, 2021). These differences are similar to the larger discussions that happen in the EU's political arena over whether the main goal of digital regulation should be to protect basic rights or to make sectors more competitive.

Over the course of the past several years, there has been a substantial rise in the quantity of writing that is associated with the regulation of artificial intelligence. According to Smuha et al. (2022), researchers have carried out an investigation on the normative foundations that the Artificial Intelligence Act is based on. Their study examined the dangers linked to excessive regulation, which is often referred to as "innovation chilling" (Ebers et al., 2021), together with the political economy of standard-setting (Gstrein, 2022). Cath (2018) and Jobin, Ienca, and Vayena (2019) studied the link between the regulation of artificial intelligence and larger discourses on ethics, human rights, and democratic duty. The research by Bolgouras et al. (2025) has concentrated on the methods that major member states have employed to change and shape the Act so that it aligns with their domestic interests.

Through its analysis of France and Germany's different negotiation approaches for the Artificial Intelligence Act, this research aims to add new insights to existing studies in political economy, EU integration, and digital governance. Specifically, the research examines the similarities and differences between the two countries' perspectives. Bendiek et al. 2020 discussed that the geopolitics of technology is a domain in which concerns that have an impact on sovereignty, competitiveness, and values are gradually coming together. This is the case in this study because it connects directly to the geopolitics of technology. This chapter will focus on the governance landscape of the Artificial Intelligence Act from the global level to the European Union.

2.1 Global AI Governance Landscape

AI governance became the central focus of international politics during the 2019-2025 period

through various initiatives including the OECD AI Principles (2019), EU's Ethics Guidelines for Trustworthy AI (2019), the U.S. Blueprint for an AI Bill of Rights (2022), G7 Hiroshima AI Process (2023), Bletchley Declaration (2023), UN General Assembly AI resolutions (2024) and the EU AI Act (2024) (OECD, 2024). One can note that this trend is connected not only with the revolutionary potential of technology but also with the limitations that it poses for democratic institutions, communities, and economies. Cath (2018) has observed that governments, international organizations, and civil society have shown a significant interest in artificial intelligence in a very short amount of time. In addition to examining the institutional logics that drive these initiatives, it is also essential to analyze the underlying geopolitical and normative discourses that sustain them, in order to understand how they have emerged.

2.1.1 Multilateral Initiatives and Global Norm-Setting

One of the earliest examples of an international endeavor was the production of the OECD Principles on Artificial Intelligence (2019). These notions were essential in the construction of the G20 Artificial Intelligence Principles, which indicate how soft law frameworks may be applied in larger governance organizations (Floridi, 2021). In the following years, these concepts were particularly important in the formation of principles. Additionally, the United Nations Educational, Scientific, and Cultural Organization (UNESCO) published its Recommendation on the Ethics of Artificial Intelligence (2021), which placed a focus on human rights, cultural diversity, and sustainability (UNESCO, 2021). Opponents, on the other hand, contend that these initiatives are typically not capable of being put into a practical application. As an instance, the ethical standards that have been developed by UNESCO are highly effective; yet the effectiveness of these standards is dependent upon the voluntary commitment of the member nations to them (Jobin et al., 2019).

One of the most significant challenges that arises in the context of the governance of artificial intelligence is the identification of a middle ground between the principles of soft law and the ways by which persons may be held accountable.

2.1.2 The United States: Innovation-First, Light-Touch Regulation

The United States has generally followed a market-driven, sectoral position to AI. The first Trump administration focused on innovation and “trustworthy AI” through executive orders (2019-2020) that encouraged light-touch regulation. The Biden administration maintained this direction while incorporating rights-based guidance through the Blueprint for an AI Bill of Rights (2022) and NIST’s AI Risk Management Framework (2023) and a wide-ranging AI Executive Order on safety and civil rights (2023) (NIST, 2025). This method focuses on developing innovative solutions while achieving global leadership instead of enforcing strict regulatory measures. While it serves more as a document of guidelines than as genuine law, the White House AI Bill of Rights (2023) provides an outline of a collection of important concerns related to artificial intelligence. There are a number of issues that fall under this category, two of which are the protection against discrimination and data privacy (The White House, 2023). In accordance with the results of the research carried out by Cave and ÓhÉigearthaigh (2018), it has been found that Congress has shown a delay in creating comprehensive rules relevant to artificial intelligence (AI). The majority of their efforts focused on programs that have been developed with the express purpose of satisfying the requirements of particular economic sectors or states.

The United States' liberal market economy model (Hall & Soskice, 2001) and the country's attention on keeping up with China in terms of technical progress (Segal, 2002) have served as the

foundation for this "light-touch" regulatory approach. Concerns about the innovation-first strategy have been voiced by a variety of stakeholders, including civil society groups, academia, labor advocates, and government agencies, such as the Federal Trade Commission (FTC) of the United States. According to the Federal Trade Commission (2022), concerns are voiced on the potential for artificial intelligence systems to embed and exacerbate discrimination, intrusive surveillance, and labor precarity. On the other hand, it has resulted in a significant amount of anxiety being felt by persons connected to the possibility of the aforementioned concerns being a reality (Crawford, 2021).

2.1.3 China: State-Led, Security-Oriented AI Governance

The Chinese government is in charge of the governance of artificial intelligence, and safety is a major focus of the governance. The New Generation AI Development Plan (2017) made it very clear that artificial intelligence should be deployed to improve industries and regulate society, and to integrate political control with economic goals. Two further proposals reflect China's preparedness to require companies to comply with standards that are often concerned with censorship and ideological security (Drinhausen, 2021). This approach is often cited as an example of what academics refer to as "techno-authoritarianism" (Polyakova & Meserole, 2019). Artificial intelligence is applied in this method not only as a means of expanding state sovereignty and authority, but also as a source of economic profit.

2.1.4 The European Union: Ethical Leadership and Regulatory Pioneering

The European Union has declared itself to be a worldwide regulatory power (Bradford, 2020). This declaration was made to define artificial intelligence governance via the use of a rights-based and

cautious approach. The Artificial Intelligence Act (2021) was the first complete set of legislation for artificial intelligence, and it was adopted by the European Union (EU). This decision was reached as a result of the High-Level Expert Group on Artificial Intelligence between the years 2018 and 2020. According to Veale and Borgesius (2021), the Act sorts applications of artificial intelligence into risk categories that range from "minimal" to "unacceptable," and it tries to prohibit or severely limit systems that constitute a threat to basic rights.

It is expected that the European Union (EU) will have a more comprehensive strategy for digital sovereignty, which would integrate this regulatory-first approach, as indicated by Floridi (2021). The purpose, as stated by the European Commission (2025), is to simultaneously work toward limiting Europe's dependency on foreign technology while concurrently working toward spreading European ideals all over the world. However, there are many who believe that rules that are overly rigid that have the potential to stifle innovation and make Europe less competitive in the field of artificial intelligence. The regulatory system of the European Union (EU) may still be able to establish de facto worldwide norms, according to Bradford's research in 2020. This is as a result of the fact that its legislation applies to those who are not members of the European Union.

To summarize, there is a growing number of governance frameworks, which suggests that a global framework for the regulation of artificial intelligence is getting more fragmented. When it comes to standards, the propensity that is referred to as "splintering" is something that scholars advise against, as stated by Zeng, Stevens, and Chen (2017). The occurrence of this phenomenon takes place when a number of perspectives, such as those that are driven by innovation in the United States, security in China, and rights in the European Union, come together to produce regulatory

incompatibilities. This results in a greater risk of governance gaps, which are a consequence of the fact that multinational AI systems are not effectively supervised. As a result, there is a greater potential for governance gaps. Data flows that transverse international boundaries and artificial intelligence services that are kept in the cloud, for example, make it more difficult to hold individuals accountable (Cihon et al., 2020). This is due to the fact that these data flows cross jurisdictional lines. National and regional policies are notably different from one another due to the fact that they are impacted by institutional traditions, economic frameworks, and geopolitical conflicts.

2.2 EU Digital Governance and the AI Act

2.2.1 From “ethics by design” to hard law

The digital governance of the European Union has experienced a change during the last decade, shifting from a strategy based on soft coordination and aspirational objectives to an approach based on extraterritorial law that is enforceable. The Ethics Guidelines for Trustworthy AI were one of the most important landmarks that occurred during the early phases of the process. This set of standards included seven operational requirements that were not only lawful but also ethical and extremely strong (Ethics Guidelines for Trustworthy AI, 2019). They were the beginning of the risk-based mindset that would later become established in legislation. Moreover, they were the first materials to describe artificial intelligence. As an additional point of interest, throughout this period, the Commission made efforts to establish Europe as a regulatory body that is capable of transmitting legislation all over the world. The General Data Protection Regulation (GDPR) serves as the most frequently referenced example because it established privacy standards that have spread to Brazil and California since 2018, and experts now call this phenomenon the "Brussels

Effect" in digital governance. (Bradford, 2020). Compared to the non-binding guidelines that were previously in existence, the Artificial Intelligence Act marks a considerable breakthrough since it is a complete, horizontal piece of law that incorporates graded legal obligations and repercussions.

2.2.2 The wider policy stack: DSA, DMA, Data Governance & Data Act

The EU AI Act is not a separate piece of legislation, rather, it is a component of a wider "digital rulebook" that the European Union has produced. Considering the Digital Services Act (DSA), the rules for performing due diligence on platforms have been subject to certain minor revisions. Among these criteria are the performance of systemic risk assessments, the maintenance of openness, and the provision of access to relevant data to researchers who have been selected. When a more limited set of VLOPs and VLOSEs is adopted in August of 2023, it is expected to go into full force on February 17, 2024. According to the Digital Markets Act (DMA), which took effect on May 2, 2023, the acts of gatekeepers are the primary focus (Waem, 2024). The Data Governance Act and the Data Act, on the other hand, are the pieces of legislation that provide rules for the transmission, storage, and access of data between private businesses and governmental administrations. These laws were first enacted in the United States. The proposals are made accessible to both commercial companies and public agencies for consideration and implementation. Especially in domains where there are stringent regulations, these criteria are of the utmost importance in relation to the development of artificial intelligence systems and their auditability. By virtue of the Data Act, data is made accessible to the general public and may be contested; by virtue of the Data Security and Management Act (DSA/DMA), platforms are held accountable; and by virtue of the Artificial Intelligence Act, models and systems are made secure (Waem, 2024).

2.2.3 Law-in-the-making: negotiations, turning points, and controversies

During the month of December in the year 2022, the Council devised a general strategy, which ultimately caused a decline in the number of definitions and a revision of the risk ratings. Following that, the Parliament lobbied for more severe biometric requirements as well as for GPAI coverage that was more open and public. Following a series of protracted conversations that took place in December 2023, a temporary political agreement was concluded among the parties involved (Council of the European Union, 2022). Among the concerns that caused the most debate were those about foundation-model commitments and biometric safeguards. The choices that have been made are in line with the debates that have been going on for a considerable amount of time inside the European Union over the importance of fundamental rights, the competitiveness of businesses, and digital sovereignty.

More specifically, concerning European champions, there were public arguments in the final few months leading up to the adoption on whether or not to make the GPAI responsibilities more severe or more flexible. While they were concerned about the costs, small and medium-sized businesses (also known as SMEs) were also concerned about the clarity of compliance requirements (Nikiforov, 2023). The comment that follows the permission highlights the objective of the European Union to set international standards, as well as the potential that the effectiveness of enforcement may be weakened owing to erroneous secondary measures or a severe shortage of resources. Both of these points are emphasized in the notice that follows the decision.

2.2.4 Interactions with markets and the “Brussels Effect” in AI.

The Artificial Intelligence Act has an impact on individuals and enterprises that are located outside of the European Union (EU) due to the fact that it is applicable to suppliers and users of systems that are marketed in the EU. In the same way that with the General Data Protection Regulation (GDPR), academics such as Siegmann & Anderljung (2022) and politicians such as Thierry Breton anticipate a de facto worldwide influence occurring in the near future. As an alternative to developing models that are suited specifically for Europe, it is possible that firms may decide to implement tactics all around the world. Because GPAI compliance demands a significant amount of processing power, this is something that ought to be taken into account, particularly in the event that it would be prohibitively expensive to divide up GPAI compliance.

2.3 National AI Strategies in the EU: France & Germany

France and Germany, the two most influential members of the European Union, have been the primary contributors to the development of the artificial intelligence agenda that the European Union has adopted. In particular with regard to the Artificial Intelligence Act and bigger concerns related to Europe's digital sovereignty, their national AI strategies not only reflect their aspirations, but they also have an influence on how they negotiate in Brussels. When comparing France and Germany in terms of their approaches to artificial intelligence, it is possible to acquire a clearer understanding of the ways in which various national political economies, institutional traditions, and techno-political imaginations come together and pull apart.

2.3.1 France: Centralized Ambition and Techno-Sovereignty

France has been a steadfast supporter of the state-led model of economic and technical growth, which is centered on the idea of dirigisme. In this approach to artificial intelligence, which is

informed by the history of the corporation, the government is considered the key organizer of innovation, coordination, and regulation. The Villani Report (*Donner un sens à l'intelligence artificielle*), which was developed at the request of the French Prime Minister, presented an extensive plan proposing a €1.5 billion five-year investment to enhance research capabilities while building interdisciplinary AI institutes and drawing international experts to the field. The report identified healthcare, mobility, environment, and defense as priority sectors because AI could create economic benefits while serving public interests (Villani, 2018), which was followed by the introduction of the National AI Strategy by France in 2018.

The French strategy emphasizes strategic autonomy, investment in Europe's digital infrastructure, and the safeguarding of basic rights (Breton, 2023). The policy discussions regarding artificial intelligence in France directly relate to the broad concept of digital sovereignty. President Emmanuel Macron asserts that artificial intelligence (AI) serves as a means for nations to engage in competition. He has also remarked that Europe should not rely on technological giants from the United States and China (Browne, 2020).

France is significantly investing in artificial intelligence research and development via governmental funding and public-private partnerships, while simultaneously seeking to implement stronger regulations at the European Union level. Jasanoff (2019) contends that France's policy incorporates ethics by design, aligning with the country's longstanding intellectual history of universalism and human rights. A clear example of this is the support for the risk-based regulatory strategy that is being taken by the European Union.

2.3.2 Germany: Industrial Competitiveness and Coordinated Innovation

The German National AI Strategy was adopted in 2018 before undergoing an update in 2020. It increased funding for AI from €3 billion to €5 billion for 2025 and incorporated knowledge gained from the first implementation period (The European Commission, 2021). The process of joint consultation and iterative adjustment demonstrates the coordinated market economy where state, industry, and research actors collectively shape industrial policy (Hall & Soskice, 2001). It can be deduced that the government, various industry groups, and research institutes are all involved in a close interaction with one another in order to develop industrial policy.

Germany's government is more decentralized and functionally federal compared to France. A federal effort that began in the early 2010s, which merges automation, robotics, and artificial intelligence into the digital transformation of industry, is known as Industry 4.0. Artificial intelligence is firmly positioned within the framework of Industry 4.0, according to the German approach (BMBF, 2025). Germany, which is the leading exporter of high-tech industrial products in the world, considers artificial intelligence (AI) less as a method by which nations may compete with one another and more as a means by which industries may become more competitive and modernize (The Economic Times, 2025).

While German authorities stress the necessity of themes such as explainability and openness, they are also cautious not to impose an excessive number of limits that may hamper the development of new ideas (German Federal Government, 2020). This pragmatic approach can be explained by the dependence of the German economy on the trade and supply networks of other countries. While

artificial intelligence is now being viewed as a tool for boosting the competitiveness of businesses, it is also being considered as a problem for attaining the necessary equilibrium in legislation and the manner in which it should be deployed.

2.3.3 Convergence and Divergence in National Approaches

Artificial intelligence is a geopolitical and civilizational concern for France because the French government places a great focus on sovereignty, ethics, and state-driven investment. This places artificial intelligence in a position of significant importance. Germany places a larger focus on competitiveness, updating industry, and governance. Artificial intelligence is largely seen as a mechanism by which the economy can adapt to new circumstances. It is of the utmost importance to have a comprehensive understanding of artificial intelligence in Europe because of the dual leadership that exists in the region, which continues to have an effect on the developing digital governance framework of the European Union.

A number of important discrepancies were brought to light over the course of the talks that took place around the AI Act. According to Stix (2021) and Veale and Borgesius (2021), both France and Germany are interested in enacting rules that are fair and do not impede the competitiveness of the industrial sector. In order to handle artificial intelligence in a manner that is unique from the laissez-faire model of the United States and the state-driven surveillance approach of China, both countries are in accord that Europe has to find a "third way" to control AI (Floridi, 2021). This is the case despite the fact that they could have different opinions on other elements of the subject.

2.4 Varieties of Regulatory Styles

When seeking to get an understanding of the approaches that France and Germany have taken to the Artificial Intelligence Act, it is essential to take into account the general problem of regulatory patterns in Europe. At the same time, this encompasses the substantive matter that is contained in rules. While some countries choose policies that are more adaptable, market-oriented, and flexible, others favor an approach that is more interventionist, cautious, and legalistic. Each of these approaches has its advantages and disadvantages. In the context of artificial intelligence governance, regulatory measures such as these are only one example of the deeply rooted institutional practices, political environments, and economic frameworks that exist.

2.4.1 Precautionary vs. Risk-Based Regulation

There are a number of inequalities in regulatory systems throughout Europe, but one of the most frequently addressed is the challenge of how to construct a medium ground between the precautionary principle and risk-based regulation. Sunstein (2005) identifies the precautionary principle as a core element of health and environmental regulations, which the European Union (EU) uses in its current regulatory framework. This is the case since the EU follows a precautionary principle as it is in the process of adopting AI legislation. The theory demands strict regulations for new technologies that introduce untested risks, regardless of the absence of scientific evidence supporting these assumptions.

Vogel (2012) states that France has a long history of dirigisme and tight government control, which has resulted in the country adopting more conservative policies in areas such as biotechnology and data security. The French government chose to adopt more conservative policies because of this conduct. Regarding the regulation of environmental concerns, Germany, on the other hand, has

typically been more legalistic than other nations. Mayer-Schonberger and Ramge (2018) indicate that the government has repeatedly backed the implementation of a risk-based framework throughout its digital strategy development process. This framework would make it possible for innovation to flourish while simultaneously supporting its expansion.

During the consultations on the Artificial Intelligence Act, this inequality was brought to light. As part of its efforts to combat the implementation of an excessive number of rules on new firms and small businesses, the French government regularly underlined the necessity of competition and creative ideas (European Council, 2023). Even though Germany is concerned about its competitiveness, the government has prioritized the need for legal clarity and good consumer protection.

2.4.2 Legalistic vs. Pragmatic Implementation Styles

According to Kagan (2001), Germany possesses a culture of legalistic control. This culture is distinguished by rules that are strict, formal, and overseen by the courts. Legal correctness guarantees that different regions communicate with one another and gives businesses a sense of stability, which is compatible with the larger federal structure that Germany has in place. Cole (2006) found that France has a history of having a regulatory approach that is more pragmatic and centralized. The fact that Germany is attempting to establish unambiguous definitions of "high-risk" systems in the context of artificial intelligence regulation is something that can be deduced from this. On the other hand, France is attempting to adopt wording that is flexible enough to enable executives and administrators to accommodate changes in technology.

2.4.3 National Economic Interests and Regulatory Preferences

Additional factors that have an impact on the sorts of regulations that are in place include the national economic structures and the strategic goals. France's goal is to build a European artificial intelligence industry that is capable of competing with enterprises from the United States and China (Villani, 2018). As a consequence of this, France is concentrating on innovation stories rather than placing blanket limitations on artificial intelligence systems. Germany, on the other hand, is particularly concerned with risk management in industries such as manufacturing, healthcare, and motor transportation, which are areas where accountability and safety are of the highest significance (BMW, 2019).

2.4.4 The EU's Hybrid Regulatory Tradition

The European Union (EU) is a hybrid regulatory system that incorporates both risk-based and precautionary approaches. This is what H  ritier (2003) means when he talks about "regulatory patchworks," which are compromises that bring together a variety of national interests. This kind of activity is something that the European Union (EU) takes part in on a periodic basis. In order to accomplish hybridity, the Artificial Intelligence Act incorporates a risk-tiered structure from the beginning. For applications that provide a low degree of risk, the purpose of this framework is to cut down on the amount of money that is spent on regulatory compliance (Floridi, 2021). A number of strict preventative measures are incorporated into this framework. These include prohibitions on particular practices, such as biometric mass surveillance, among other things.

2.4.5 Implications for AI Governance

The fact that France and Germany take different approaches to the regulation of many different

sectors of science and technology is one of the probable explanations for the contentious nature of the arguments that have surrounded the Artificial Intelligence Act. In comparison with Germany's legalistic, risk-oriented, and consumer-protective policy, one can note that France's approach was more pragmatic, innovation-driven, and based on sovereignty. On the other hand, these disputes are beneficial because they compel compromises and are responsible for the establishment of a sort of governance for the European Union that is both adaptive and accountable. The Artificial Intelligence Act is not only a piece of legislation; it is the culmination of a comprehensive set of ideas concerning the manner in which Europe must strike a balance between innovation, risk, sovereignty, and market integration.

2.5 Research Gaps

Research on artificial intelligence governance has, up until this point, mostly concentrated on global-level frameworks and the goals of key geopolitical organizations, such as the United States of America, China, and the European Union itself (Buiten, 2019; Floridi, 2021; Zeng et al., 2017). These studies typically fail to take into consideration the internal heterogeneity that occurs within the European Union (EU). Renda (2021) and Roberts et al. (2022) point out that the presumption of a cohesive "European model" of trustworthy artificial intelligence ignores the national-level disparities that have an effect on the outcomes of talks and policy within the European Union.

When it comes to the comparative evaluation of policies across all of the member states, however, there is a vacuum in the study that has to be filled. There has been a significant amount of study carried out by Bulmer and Paterson (2018) & Schramm and Krotz (2023) on the topic of leadership in France and Germany, especially with regard to the integration of Europe. However, there is a

lack of studies that explore each of their approaches to the management of artificial intelligence in a comprehensive manner. The AI Made in Germany plan and the AI for Humanity Strategy of France are both explained in great detail in these publications, which also explain the goals that each strategy attempts to accomplish. Villani (2018) and the Federal Government of Germany (2020) state that they do not conduct adequate studies into how they affect negotiation strategies during conversations that take place at the EU level. As a result, the interaction between the traditions of national industrial policy and the regulation that occurs at the EU level is theoretically incomplete.

The utilization of analytical frameworks is another gap. There has been insufficient effort made to integrate these perspectives in order to highlight the complex dynamics that are present in EU regulatory politics. The overwhelming majority of the research that has been done on the Artificial Intelligence Act either investigates its legal concerns in a limited manner (Veale & Borgesius, 2021) or considers it as an example of Brussels deploying the "Brussels Effect" to increase its regulatory influence throughout the world (Bradford, 2020). The effect of distinct national traditions of capitalism and sovereignty discourses on the portrayal of artificial intelligence (AI) inside the European Union (EU) as either an economic opportunity, a security risk, or an ethical obligation is something that has not been properly examined.

Lastly, there is no empirical triangulation among the several sources. The use of a systematic integration of official publications, legislative documents from the European Union, and parliamentary debates is not something that scholars do very often. The research is based on policy papers or secondary assessments from think tanks. Consequently, this results in a methodological

deficiency in terms of being able to comprehend not just the public statements made by governments but also their strategic positioning within the greater framework of policy-making within the European Union, as stated by Krippendorff (2019) and Braun and Clarke (2006).

Due to the existence of these gaps, it is necessary to conduct research that goes beyond merely providing descriptive reports on national plans, conducting legal-technical investigations of the AI Act, or engaging in theoretical discussions concerning digital sovereignty. In order to analyze the roles that France and Germany played in the talks for the Artificial Intelligence Act, this thesis makes a contribution to filling these gaps by adopting a multi-theoretical approach and a thematic content analysis.

Chapter 3: Theoretical Framework

When it comes to arranging a comparative investigation of the manner in which France and Germany negotiated their positions throughout the process of drafting the European Union Artificial Intelligence Act (AI Act), selecting the suitable analytical lenses is of the highest significance. The analytical lenses provide conceptual frameworks in political science and international relations. Through the use of analytical lenses, scholars can position particular aspects of complex political processes, such as normative discourses, institutional path dependencies, historical legacies, or economic structures, within broader theoretical discussions (Hall, 2003).

The Artificial Intelligence Act of the European Union serves as a perfect illustration of Radaelli's (1999) definition of "policy transfer in the European Union.". As Schimmelfennig and Winzen

(2020) highlight, it is unlikely that a single theoretical framework will be able to adequately represent all of this complexity. The research into differentiated integration examines how states participate in the EU initiatives at various levels through institutional systems. Debates that have taken place in recent times about digital sovereignty have placed greater focus on these dimensions.

The research conducted by Wiener and Diez (2009) demonstrates how these lenses work together to show the multi-level and multi-theoretical aspects of EU governance. On the other hand, a pluralist perspective delivers an elaborate analysis of how Germany and France tried to shape the Artificial Intelligence Act. This is because the pluralist viewpoint takes into consideration the fact that there are other perspectives at play. For the purpose of providing a better understanding of the development of national preferences and negotiating methods in EU digital governance, this study has adopted the aforementioned integrative approach. Additionally, a focus is placed on how these lenses work together to create a complete view.

3.1 Historical Institutionalism: Path Dependence and Critical Junctures

Historical Institutionalism (HI) serves as a fundamental framework to explain how France and Germany handled their Artificial Intelligence Act debates through their respective approaches. According to the concept, political decisions are not made in a vacuum but rather are embedded within institutional trajectories that have developed over the course of time (Thelen, 1999). The process of path dependency creates a self-reinforcing pattern of decisions that pushes systems toward particular directions while making other possible paths more costly. After institutions are established, they usually determine political behavior and policy options through path

dependencies (Mahoney, 2000).

Both France and Germany have long-standing traditions that influenced how they viewed the risks and advantages of artificial intelligence. Historically, France has been at the forefront of technological innovation thanks to its state-led approach to economic growth and industrial policy (Levy, 1999). This approach has included various industries, from nuclear energy to aerospace. According to Meunier and Vachudova (2018), this heritage of statism results in a desire for strategic independence as well as a propensity to regulate technology in ways that are advantageous to countries with regional and global ambitions. On the other side, Germany has always supported a regulatory history that is more leaning toward orthodox liberalism. In this system, the government is not responsible for managing the outcomes of industrial processes; rather, it is responsible for developing a rules-based structure that safeguards competition and prevents market distortions (Dullien & Guérot, 2012). These various institutional legacies are not only abstract concepts; rather, they have an impact on the kinds of arguments that politicians find appealing and the compromises that they are willing to accept in Brussels.

The concept of path dependence makes a lot of sense in this particular scenario. The advantages of continuing on the existing trajectory are greater than the uncertain costs associated with moving to alternatives, according to Pierson (2000), who argues that once policies or institutional frameworks are implemented, they give expanding returns. For example, because Germany is so heavily reliant on its *Mittelstand* (small and medium-sized firms) and its export-oriented manufacturing sector, the country's digital regulatory preferences usually prioritize predictability, proportionality, and keeping compliance costs as low as possible. France, on the other hand, has

made investments in high-tech industries that are directed by the state as well as major national champions such as Airbus and Atos. Regulatory frameworks that are strong are seen as both constraints and instruments for molding markets in accordance with the objectives of both the national and European governments.

Historical institutionalism highlights that institutional pathways can be disrupted at important junctures, which are times of crisis or upheaval when established norms become flexible, hence enabling actors to argue for alternate orientations (Capoccia & Kelemen, 2007). Europe perceived an urgent need that it needed to immediately establish its regulations as a result of the fast-paced progress of artificial intelligence (AI), as well as the increasing competitiveness of the United States and China in the global arena. The initiative went beyond consumer protection and data management because it aimed to establish the European Union as a global leader in digital governance (Bradford, 2020).

3.2 Varieties of Capitalism (VoC)

Hall and Soskice (2001) showed that the Varieties of Capitalism (VoC) paradigm is an essential theoretical framework for assessing the effect of institutional differences on the economic strategies, policy decisions, and regulatory methods of governments. The VoC model identifies two primary economic systems, which are liberal market economies (LMEs) and coordinated market economies (CMEs), through their distinct features. The main drivers of innovation in liberal market economies (LMEs) such as the United States and the United Kingdom are market dynamics, competitive labor, and governance headed by shareholders. Coordination of procedures that do not require individuals to purchase and sell products is the primary emphasis of coordinated

market economies, such as those seen in Germany and the Scandinavian countries. Numerous employer organizations, collaborative initiatives in the field of labor relations, and training programs are examples of these strategies.

When it comes to the regulation of digital technology and artificial intelligence, France and Germany, two of the most influential players in EU policy, may have different perspectives. Relationships between corporations, labor unions, and the government make it feasible for long-term investments to be made in training and technology. Both delayed innovation and stringent regulatory supervision are encouraged by the architecture of this organization for its institutional structure. France is considered by many academics to have a "mixed market economy" (Schmidt, 2002). This term refers to the fact that liberalization forces and state-directed industrial policy function together in the same manner.

A more in-depth comprehension of the process by which institutional logics are transformed into policy preferences may be made possible by the use of the VoC paradigm in the field of digital governance. In the context of the discussion on the Artificial Intelligence Act, it is essential to keep in mind that the placement of the CME in Germany serves to strengthen Germany's emphasis on risk regulation, standardization, and accountability. The German government, together with corporations, has maintained the competitiveness of its respective sectors through establishing rigorous benchmarks and encouraging individuals to maintain their faith in technological advancements (Thelen, 2014). The government actively uses its authority to demonstrate support for national leaders in artificial intelligence and computer infrastructure, according to Meunier and Vachudova (2018).

The VoC method underscores the importance of institutional complementarities, which are among the most significant aspects. These include vocational training systems, collective bargaining organizations, and corporate governance. Collectively, these groups collaborate to support both minor adjustments and significant reforms in regulatory procedures. Their collaboration significantly depends on the combination of adaptable labor markets with venture capital investments and governmental actions, which enables this reality to exist. Focusing on the regulation of artificial intelligence, Germany, which has stable institutions for a long time, places a stronger emphasis on risk, responsibility, and proportionality. On the other side, the French government raised fears that the new legislation would impose hurdles that would prohibit European digital enterprises from achieving market domination or extending their business operations.

3.3 Digital Sovereignty and Techno-Nationalism

The analytical frameworks of digital sovereignty and techno-nationalism serve as crucial tools to understand technology governance. Both Pohle and Thiel (2020) and Vogiatzoglou (2025) have proposed that the concept of sovereignty is facing a metamorphosis within the realm of digital technology. People show increasing interest in artificial intelligence (AI), cloud infrastructure, and digital platforms. The trend exists in both social and business environments. The European Union, along with its influential member states France and Germany, successfully employed sovereignty as a technique to strategically support their positions regarding the Artificial Intelligence Act and other digital regulations. This was accomplished by using sovereignty as a tool to strategically support their positions, such as the General Data Protection Regulation and the Digital Services

Act.

An individual is said to have digital sovereignty when they are able to exert control over their own digital infrastructures, data flows, and technical requirements. States, supranational organizations such as the European Union, and private businesses are all examples of prospective candidates for this power. Both Hulkó et al. (2025) and Pinto (2018) came to the conclusion that individuals do not feel that their authority to make choices should be outsourced to governments or corporations that are located in other countries. In other words, it is not restricted to those challenges that are associated with technology. Moerel and Timmers (2021) explain that France has maintained its focus on "l'autonomie stratégique numérique" (digital strategic autonomy). This notion establishes a relationship between the research of artificial intelligence and France's ultimate objective of establishing European independence in international affairs.

According to Capri, the strategic application of technology policy can enhance a number of various elements. These include national security, geopolitical influence, and economic competitiveness (2024). It also refers to the technical competition between the USA and China, despite Europe is one of the major grounds. On the other hand, it is considered a digital resource to influence the international system. Those who hold the viewpoint of techno-nationalists are in direct opposition to this point of view. Consequently, the governments have made it their responsibility to actively participate in the process of formulating research and innovation agendas, to offer financial assistance to national champions, and to exercise influence over the process of formulating international standards.

The pursuit of digital sovereignty by Europe is, to some extent, an endeavor that is driven by defensiveness, as indicated by the conclusions of research that was carried out by members of the academic community, such as Aaronson (2019). People have the notion that it is an attempt to build a "third way" between the market-oriented models of the United States and the state-directed techno-nationalism that China continues to retain to this day, as stated by Floridi (2019). The European Commission has started to make use of the concept of sovereignty in a more regular manner since the publication of the European Data Strategy in 2020. Via this Strategy, data governance and issues surrounding strategic autonomy are brought into direct contact with one another.

The French approach to strategic planning and goal setting involves prioritizing state-led initiatives. Schmidt (2020) indicates that this could be linked to the fact that the country has traditionally employed dirigisme in its industrial policy. To prevent Europe from becoming a "rule-taker" in the realm of technology, France and Germany share the view that sovereignty is necessary in the multipolar digital world.

The fact that France and Germany have adopted views that extend beyond technical control in the digital world is evidenced by the fact that these opinions represent more fundamental differences about identity, independence, and authority. On the other hand, the narrative of sovereignty serves as a defense for more regulation, while the logic of techno-nationalists offers the geopolitical context for investments in regional innovation and infrastructure.

3.4 Differentiated Integration in the EU

When it came to enlargement and policy depth, it was clear that the European Union's goal of uniformity was occasionally in contradiction with the various interests of its members. From a legal and institutional perspective, the formal arrangements that permit member states not to fully embrace integration in some policy areas are the primary focus of attention (Kölliker, 2001). A "multi-speed Europe," in which certain nations are regularly placed in a lower tier, is detrimental to the unity and legitimacy of the European Union, according to critics (Adler-Nissen, 2011; Holzinger & Schimmelfennig, 2012). Critics, on the other hand, underline the hazards connected with building a "multi-speed Europe."

Focusing on the regulation of digital communications, the capacities and requirements of member states are very diverse from one another. This is because of the proliferation of digital communications. For instance, France and Germany are two countries that have a significant amount of economic interests in the regulation of artificial intelligence and think that they are leaders in the field of digital technology. A fragmented implementation environment is a possibility that might materialize as a consequence of the existence of this disparity. Two examples of policies that have the potential to lead to DI pathways are digital sovereignty and data governance. This is because governments may be hesitant to hand over authority to supranational entities, as noted by Blauburger and Weiss (2013). One possible explanation for this is that governments prefer to retain control over their data.

In addition, diverse integration is not just about formal opt-outs; it is also about disparities in the

manner how regulations are applied and enforced in practice. Even if France and Germany enact artificial intelligence legislation in the same manner, they may interpret and apply the rules differently due to the fact that they have different institutions, industrial strategies, and aspirations for AI leadership. Besides, this is because France and Germany have different goals for AI leadership.

To summarize, differentiated integration is not only a reality that takes place across the European Union (EU), but it is also a style of thinking that helps us appreciate the reasons and processes that are responsible for the existence of differences in areas of shared policy. Because it permits influential countries like France and Germany to strive for their regulatory regimes while remaining inside the framework of the European Union. As a result of this, the European Union can demonstrate its adaptability, which is one of the reasons why it is so significant. The question of whether this freedom will result in increased innovation and inclusiveness, or whether it will make the divisions that already exist within the Union even more pronounced, is one that cannot be answered and is still unresolved.

3.5 Justification for a Multi-Theoretical Approach

Especially in a sector as diverse as artificial intelligence (AI) governance, there is no single theoretical framework that can fully capture all of the complexity that is involved in the engagement of member states in talks at the EU level. This is more relevant in situations where there are a number of different elements at play. In addition, this is particularly relevant with reference to the management of artificial intelligence. The scope of this research encompasses the utilization of a variety of analytical frameworks. These include differential integration, digital

sovereignty, historical institutionalism, techno nationalism, and varieties of capitalism. It is essential to keep in mind that these conceptual frameworks deliver useful insights, yet they contain built-in limitations that stem from their fundamental framework structure.

Historical institutionalism provides a better understanding of how past policy choices and institutional changes have shaped current preferences. This is because historical institutionalism serves as a lens through which one can view the broader surroundings. In this study, it can be used to explain why France maintains its aggressive state-led industrial policy, which supports its goal of achieving "strategic autonomy" in digital technologies.

The VoC framework distinguishes between two models of capitalism. It includes coordinated market economies that use cooperation and long-term relationships and liberal market economies that use competition and market forces. Within the framework of Germany's coordinated strategy, stability, social partnership, and regulatory control are all accorded a significant level of priority. The French, on the other hand, have a dirigiste orientation. It implies that they are more focused on state-led techniques for innovation and competitiveness (Schmidt, 2002). Nevertheless, it should be noted that the VoC approach has been attacked for its static typologies. It sometimes does not reflect the dynamic and contested nature of policy debates in quickly expanding industries such as artificial intelligence (Hancké, Rhodes, & Thatcher, 2007).

In order to provide a modern perspective that directly addresses the geopolitical and normative ramifications of artificial intelligence regulation, the concepts of digital sovereignty and techno-nationalism have been included in this study. As Pohle and Thiel declared in 2020, and Bellanova

et al. indicated in 2022, the most recent analysis shows that talks in Europe about digital governance are strongly tied to broad global trends, the most significant of which is the expansion of digital power in the United States and China. Also highlighted is the fact that these discussions are taking place in Europe.

The idea of differentiated integration is of equal value. Schimmelfennig and Winzen (2020) indicate that the European Union (EU) is becoming more dependent on flexible arrangements. These arrangements make it possible for member states to take part in a wide array of policy domains. Differentiated integration helps explain member state preferences to some extent, but it does not fully reveal their domestic or historical motivations. This method requires multiple perspectives to understand complex political events. In this study, an effort is made to avoid reductionism by positioning the analysis at the confluence of diverse explanatory traditions. This approach aims to present a nuanced picture of the route that France and Germany took during the Artificial Intelligence Act negotiations.

Chapter 4: Methodology

The research uses a comparative qualitative case study design to study the different perspectives of France and Germany regarding the European Union's Artificial Intelligence Act (AI Act). The research design was chosen because of the intricate nature of the study subject and the significance of the research. In order to regulate artificial intelligence at the European Union (EU) level, it is not enough to simply focus on regulations. Multiple elements, including national economic conditions, industrial plans, and EU-wide strategies, need evaluation for this purpose. According to Maxwell (2012) and Flick (2018), the most successful approach is a qualitative one because it

enables researchers to understand meanings and stories and causal processes that are hard to quantify. Also, by using the case study method, we are able to analyze in greater depth how national preferences transform and differ across various circumstances.

4.1 Qualitative Method

Stories, frames, and discourses were just as important as official perspectives during the majority of the discussions that took place around the Artificial Intelligence Act. These discussions took place in informal trilogues, Council working groups, and ministerial pronouncements. By the tradition of comparative politics and European studies, which employs case studies to investigate how the European Union is coming together (Risse, 2010), the qualitative method is appropriate. Within the domain of digital governance, which is marked by rapid technological change and new legislative frameworks, case study approaches are particularly effective for improving theory (Bartlett & Vavrus, 2017).

4.2 Reasons for Case Selection

France and Germany are the two members of the European Union that have the greatest economies, and they have worked together for a long time to drive Europe toward a more interconnectivity. The Franco-German alignment that had previously existed was disturbed as a consequence of their disagreement about the governance of general-purpose artificial intelligence (GPAI) and fundamental models in the AI Act. Accordingly, the case is particularly relevant from an analytical viewpoint because of the disruption that it caused. France and Germany each have their own distinct political economy and digital policy precedents. There are, nevertheless, essential qualities that are comparable across the two countries. These characteristics include magnitude, effect, and

institutional development.

4.2.1 France

In the course of the discussions around the Artificial Intelligence Act, a strategic way of thinking evolved into regulatory preferences. France has advocated for a more open legal environment for general-purpose artificial intelligence (GPAI) and foundational models, citing the fact that high compliance costs could potentially hinder the competitiveness of innovative French artificial intelligence businesses such as Hugging Face and Mistral AI (Groupe d'études géopolitiques, 2024). According to Mügge (2024), French negotiators favor standards of behavior established by the sector and graded oversight over legislative commitments because they believe that the latter is more conducive to innovation. While the French government intended to safeguard its leaders, it also wanted to create dominance in an area that was considered crucial to global technical competitiveness. Because of France's robust presidential system, the creation of AI policy has become more centralized inside the executive branch, particularly the Élysée and the presidency. These characteristics made France one of the prime actors at the AI Act negotiation table. Hence, France holds a strong sense of interest for further study.

4.2.2 Germany

The ambitions of Germany were influenced by the country's predominant industrial base. Also, many became concerned about the necessity of having defined norms and obligations, particularly in high-risk applications of artificial intelligence in the healthcare, industrial, and automotive industries (Renda, 2019). There is a three-party alliance that was formed by the Social Democratic Party (SPD), the Free Democratic Party (FDP), and the Green Party. One should note that there

were a variety of perspectives among them regarding the regulation of digital technology. It was emphasized by the Free Democratic Party (FDP) and a few members of the Green Party that there should be more innovation, competitiveness, and fewer rules. As stated by Bulmer and Paterson (2018), the SPD and the appropriate ministries gave priority to the safeguarding of fundamental rights, labor rights, and openness. Germany's negotiation position was weaker than France's, which was led by the president, as a result of internal concerns within the alliance. But still, as an automobile and tech giant in Europe, Germany has always had a strong influence on regulations at the EU level.

4.3 Data Collection Technique

Document-based qualitative data collection is the major approach that is applied in the process of conducting this study. Further sources include scholarly assessments, articles from think tanks, and secondary literature. The assessment of stakeholder preferences and negotiation methods and the identification of consensus and divergence areas between France and Germany requires the systematic use of textual materials from national governments and EU institutions.

The research uses official communications and policy documents, and legislative records as primary data to explain actor preferences and bargaining behaviors (Beach & Pedersen, 2018). The selection of documentary methods is in accordance with the standards in comparative political science. It is possible that the intentions and reasons that lie behind an individual's behavior may be difficult to comprehend based only on conversations, particularly at high-level meetings in Brussels. On the other hand, documents frequently provide insight into certain facets of an

individual's behavior. Depending on the circumstances, documents have the potential to be a highly helpful source of information.

4.4 Data Analysis Techniques

Dual qualitative analysis is utilized in this research project in order to conduct an in-depth investigation and comparison of the perspectives held by French and German parties about the discussions around the Artificial Intelligence Act. This makes it possible to compare and investigate the viewpoints held by both sides. It is required to utilize a combined approach of theme analysis while performing an examination into policy and the rhetorical tactics that are employed to promote them in order to acquire a complete knowledge of the basic features of these points of view.

4.4.1 Thematic Analysis

Braun and Clarke (2006, 2021) devised a technique that has been demonstrated to be effective, and this approach is applied in the initial stage of the research project that is being carried out. This technique tries to discover recurrent themes and patterns that have been prevalent throughout the course of the years by classifying policy papers, official communications, and data from the European Union. This is also accomplished through the process of categorizing these documents. The analysis employs both the inductive and deductive methods. The aims of identifying preferences inside the European Union and keeping an eye on artificial intelligence are accomplished through the utilization of these deductive procedures, which make use of theoretical frameworks that were found in the most recent study. Inductive approaches were utilized, which proved to be of considerable aid in the production of innovative ideas that were drawn from the

data.

Chapter 5: Analysis and Discussion

The goal of this chapter is to establish the reasons why France and Germany had different viewpoints on the talks for the Artificial Intelligence Act (AI Act). This objective is attained by utilizing the theoretical frameworks that were described in previous chapters. The transition from the previous chapters, which focused primarily on the governance landscape of Europe and the world as a whole and investigated the principles that underpin them, is an interpretative interaction with the secondary sources that were utilized for the study. It should be underlined that this chapter doesn't only aim to present the ideas that were voiced by the French and German governments throughout the process of negotiations, but also to emphasize the underlying institutional and ideational factors that affected their positions.

The subject of digital policy within the European Union has been a contentious matter. Issues about basic rights, ethical standards, and market regulation are in explicit disagreement with one another when it comes to the needs of innovation, competitiveness, and sovereignty. Scholars like Floridi (2021) make it obvious that these conflicts are present in the context of the Artificial Intelligence Act, which attempts to control artificial intelligence at a level that extends beyond the boundaries of individual nations. Although they exert influence on each member of the European Union, the preferences and traditions of powerful member states have a substantial impact on the method in which the discussions are handled. Börzel and Risse (2017) came to the conclusion that policymaking within the European Union (EU) is closely connected to the particular national contexts of its members.

Hall and Soskice (2001) consider France and Germany to be particularly outstanding models that should be taken into consideration. The authors came to the conclusion that not only are they the two largest economies in the European Union, but they also represent two rather different forms of capitalism and regulatory regimes (2001). As an example, the European Commission (2021), the German Federal Government (2020), and the French Ministry of Economy and Finance (2018) debated concerns of digital sovereignty, innovation capacity, and ethical oversight in a manner that is substantially different from one another by a significant margin.

Within the Varieties of Capitalism framework, supported by content analysis, this study sheds light on the mobilization of concepts such as "trustworthy AI," "technological sovereignty," and "innovation leadership" in favor of particular legislative preferences. In addition, the content analysis of official documents and policy texts guarantees systematic triangulation, which eliminates the possibility of individual biases (Krippendorff, 2019).

The progression that takes place during this chapter may be broken down into three distinct stages, which provide an extra point of interest. Firstly, this paper makes a comparison between the national policies of France and Germany, as well as the manner in which they approach the subject matter of the Artificial Intelligence Act. Secondly, it presents these outcomes within the context of the larger bargaining process that is taking place in the EU, so illustrating how things are evolving and deteriorating in a manner that is proportional to the situation. Besides, it addresses the significance of these findings for the legislative process within the European Union, particularly regarding differentiated integration and the possibilities for digital sovereignty in the European

Union. To be more specific, it concentrates on a number of different facets of the legislative process.

5.1: France's Position on the EU AI Act

5.1.1 Overview of National AI Strategy and Digital Policy

Villani's 2018 reports noted that France has risen to the position of being among the major European countries in terms of drafting rules addressing artificial intelligence (AI). In 2018, President Emmanuel Macron issued an order for the Villani Report, which ultimately led to the official statement of the nation's vision for artificial intelligence. Using artificial intelligence (AI) to make the economy more competitive while also promoting ethical principles, social responsibility, and European strategic autonomy was the topic of the study that was published by Cédric Villani, a prominent mathematician and member of parliament (Villani, 2018). By announcing its National AI Strategy with the "AI for Humanity" program, France expanded upon the foundation that it had previously constructed. The French government has dedicated more than €2.5 billion to AI research and technology since 2018, through funding of €1.5 billion for institutes and doctoral programs and the Jean Zay supercomputer, and €1 billion for France 2030 to develop nine AI Clusters and train 100,000 students yearly. The startup environment experienced rapid growth because AI startups exceeded 1,000 in number during 2025 while securing €1.9 billion in funding during 2024 through major investments like Mistral AI (€1.2 bn) and Poolside (€526 m). France has become home to 16 AI-related unicorns while maintaining its position as the third-largest country for AI researchers worldwide. Foreign AI investment has chosen France as its leading European destination because the country has received more than €109 billion in

infrastructure project announcements from Amazon, Brookfield, Microsoft, and Fluidstack (Irwin-Hunt, 2025).

The February 2025 AI Action Summit in Paris, France, established the country as a leading force for developing AI systems while being environmentally friendly and dependable, thus supporting its domestic focus on accessibility and ethical AI development and national AI sovereignty (Elysee, 2025b). The fact that France is placing equal importance on industrial growth and normative leadership is evidence that the country is striving to find a middle ground between its objective of achieving technological advances and its desire for artificial intelligence governance that places the requirements of all citizens at the forefront of its priorities.

The solid public research infrastructure that France possesses has been one of the most crucial parts of the strategies that France has implemented. Both the National Centre for Scientific Research (CNRS) and the National Institute for Research in Digital Science and Technology (INRIA) are examples of national institutions that are at the forefront of artificial intelligence research. The authors Jasanoff and Hurlbut (2018) support the "Colbertist" position that the state should lead technological development. This approach stands as an alternative to the artificial intelligence ecosystems that exist in the United States. The strategy simultaneously focuses on talent development through PhD programs, cooperation between academic institutions and private businesses, and international recruitment of personnel. Supercomputers serve as essential tools for AI because they enable the training of sophisticated models and handle extensive data processing requirements. According to the TOP500 (2025), the world's supercomputing capabilities exist mainly in a few concentrated locations. The United States holds the top position with 175

supercomputers, followed by China with 47 and Germany with 41 and Japan with 39 and France with 25, and Italy with 17, while the remaining 29 economies share 26% of supercomputers. The United States and China have controlled compute capacity since 2012, while China's market share started to grow after 2015. The French supercomputing investments help the country improve its AI competitiveness by solving the compute divides, as OECD analysis has identified (OECD, 2024).

Additionally, the French government's approach to artificial intelligence is connected to broader concerns around European digital sovereignty. President Macron has repeatedly brought up the issue of decreasing Europe's reliance on technological companies that are based abroad. According to him, artificial intelligence is a field in which Europe has to be independent in terms of its norms and technology (Elysee, 2024). Overall, France has provided a strong endorsement of the Artificial Intelligence Act. In addition to lobbying for policies that encourage innovation and do not create an undue amount of burden on European businesses, France has placed an emphasis on the necessity of precautionary principles and risk-based regulation (Floridi, 2021).

France's objective is to act as both a testing ground and a rule-maker inside the European Union. It aims to adopt rules that protect basic rights while also increasing market competitiveness. The National AI Strategy of France establishes specific long-term objectives as its foundation. The strategy focuses on developing research and training capabilities through the unification of AI institutes, the establishment of excellence centers, and the recruitment of international top talent for universities and research facilities. The initiative seeks to establish AI as a fundamental component of every sector and public service and all aspects of society. The concept encompasses

public engagement and education via "AI Cafés," facilitating individuals' understanding of AI's advantages and risks while fostering dialogue. Finally, France aims to develop trustworthy AI systems through its establishment of INESIA, which positions the country as a leading force in ethical and secure AI governance (Élysée, 2025).

5.1.2 Key Governmental Actors and Institutional Preferences

Artificial intelligence (AI) administration in France is defined by a complex network of government participants. It is a reflection of the long history of dirigisme in the French state, which refers to the coordination of economic and technological policies by the state. The AI for Humanity initiative, launched by President Emmanuel Macron in 2018, highlighted his robust political support for artificial intelligence (The European Commission, 2021). The initiative strengthened France's commitment to achieving its objective of integrating technical advancement with ethical, fair, and sovereign leadership.

The Ministry of Higher Education, Research, and Innovation (MESRI) functions as the principal decision-making authority for the government's artificial intelligence policy. It establishes the scientific foundation for the formulation of artificial intelligence policy. The National Institute for Research in Digital Science and Technology (INRIA) and the National Centre for Scientific Research (CNRS) are two major public research institutions that have received substantial funding from MESRI. According to Harari-Kermadec and Noûs (2020), these two bodies are the key components of France's research infrastructure for artificial intelligence.

There is a considerable institutional bias toward centralization and coherence in the execution of

policy. The development of artificial intelligence requires independent regulatory and advisory bodies like the CNIL (Commission Nationale de l'Informatique et des Libertés) to ensure ethical and legal compliance. CNIL maintains a strong dedication to protecting the privacy of individuals and ensuring that algorithmic procedures are open and transparent. It also makes sure to comply with the rights-based regulatory framework of the European Union, as noted by Broussard (2019) and Floridi (2021). According to Macron, considering the aforesaid priorities, the French government must develop a plan that supports industrial leadership goals and maintains human rights protection and individual accountability standards (Élysée, 2024).

5.1.3 Main Themes in France's Position on Artificial Intelligence

5.1.3.1 Innovation and Competitiveness

The French government's long-term objective of establishing itself as a leading center for digital innovation while simultaneously protecting Europe's economic competitiveness has a significant influence on the country's attitude with regard to the EU AI Act. France views AI innovation and competitiveness as both a vital national matter and an essential European challenge. Macron declares AI stands as the key driver for economic expansion and productivity growth and national independence while he believes Europe trails behind the United States because of inadequate funding and technology spread. The French government established a unified innovation policy to solve this problem through research institution development and researcher-friendly policies and AI cluster and supercomputing infrastructure creation (e.g., Jean Zay and future EuroHPC exascale systems). The nation aims to increase its AI talent supply by two times while supporting startups through FrenchTech and Tibi funds and private-public collaboration initiatives. The country's competitive position depends on its ability to maintain its low-carbon nuclear-powered energy

infrastructure, which enables the operation of large datacenters. Macron uses this opportunity to create a strategic wake-up call, which will help France become a global competitor through its open, trustworthy, and inclusive AI innovation model (Élysée, 2024).

Paris has been concerned ever since the beginning of the negotiations that excessively harsh laws may make it more difficult for Europe to catch up to the United States and China in the race to develop artificial intelligence (Bertuzzi, 2024). Although ethics are of great significance, Balcioğlu et al. (2025) note that the French government considered on several occasions that they should not be permitted to impede scientific leadership and economic progress. According to Harari-Kermadec and Noûs, (2020), the French economic philosophy was developed to locate a compromise between a robust regulatory state and a proactive industrial strategy. This endeavor to strike a balance is consistent with France's broader economic doctrine.

5.1.3.2 French Tech and Strategic Autonomy

A further crucial feature of France's stance on the Artificial Intelligence Act is the purpose of obtaining strategic autonomy, as well as the role that French technology plays in the process. A substantial amount of money has been invested by France into its digital ecosystem during the previous ten years through the implementation of projects such as La French Tech (Élysée, 2024). It has been stated by Balcioğlu et al., (2025) that the government considers the Artificial Intelligence Act to be a collection of rules that should not impede the capacity of the ecosystem to develop, but rather should encourage it to flourish. The Artificial Intelligence Act is regularly referred to by French legislators as something more than just a piece of legislation. It is a component of a bigger plan for the industry that will aid Europe in retaining and developing enterprises that are of world-class artificial intelligence.

The idea of strategic autonomy, which has its origins firmly rooted in French political philosophy, has arisen as a guiding principle in the digital strategy of the country. From the perspective of France, Europe should reduce its reliance on digital conglomerates located in the United States and China, which are the main participants in artificial intelligence marketplaces and infrastructures all over the globe (Moerel & Prins, 2022). The implementation of this measure would guarantee that European companies are not at a structural disadvantage in contrast to their rivals. Specifically, this is a component of a bigger geopolitical problem, which is that Europe may become a "rule-taker" rather than a "rule-maker" if it does not have sufficient support for its information technology industry (Cook et al., 2022).

In addition, the French government sees the Artificial Intelligence Act as a way to advance its vision of digital sovereignty in Europe and a lever to reduce dependence on foreign technologies (Rols, 2025). This is also in accordance with the French government's industrial plans, such as France 2030. According to the OECD (2022), France was interested in seeing the regulatory framework of the European Union put into effect so that European businesses might gain a competitive edge over foreign businesses. The government of France views the Artificial Intelligence Act and La French Tech as two sides of the same coin. In contrast to the former, which develops the standards that enable European businesses to thrive on a worldwide scale while yet keeping committed to European traditions, the latter stimulates innovation on the ground.

5.1.3.3 Discursive Framing: “AI Made in Europe”

France supports the development of European AI technology through its “AI made in Europe”

initiative, which operates within the framework of the “Made in Europe” industrial doctrine. The initiative aims to develop world-class AI systems within European borders while following EU regulations to establish trust and quality standards for international markets. Macron established the doctrine as the core of European economic policy through his Sorbonne speech, which connected it to digital technology and data sovereignty (Elysee, 2024). France used the Paris AI Action Summit in February 2025 to unite value-based branding with large-scale development through its initiative to establish France as a leading AI power and its declaration of substantial funding for infrastructure development, including compute resources and low-carbon power facilities, and data centers (Browne, 2025).

The brand represents three essential elements which include strategic autonomy through domestic compute and chip production, sovereign cloud operations and EU-champions at scale through talent pipelines and capital access and norm-setting through EU law and testing infrastructures like TEFs for trustworthy AI market deployment (Mügge, 2024).

By promoting the slogan "AI made in Europe," the French government is aiming to convince other member states to support a constructive vision of European technical leadership rather than a protective regulatory approach. It provides France with the potential to depict its ideals not just as national interests, but also as a component of a larger European vision when it comes to the European Union. It is believed that this framing can alter personal identities while transforming minor regulatory issues into major disputes about European influence in global governance (Zürn, 2019).

5.1.4 France's Influence on the EU Artificial Intelligence Act

The EU's AI Act received substantial influence from France, which supported an innovation-friendly framework that combined regulatory control with European AI development promotion (Wodecki, 2023). The French government participated throughout the entire legislative process which began with proposal submission and continued through trilogue negotiations to establish key aspects of the regulation including oversight of general-purpose AI models and rules for biometric surveillance and exceptions for law enforcement.

France joined Italy and Germany in backing the AI Act since they understood its dual purpose to defend EU citizens through AI product protection and maintain GDPR and Digital Services Act compliance. The main point of their shared position involved supporting an equilibrium-based system that welcomed innovation through risk assessment (Nikiforov, 2023). The initiative focused on eliminating excessive administrative requirements that would block European innovation through its goal to promote digital market competition and openness. The experts stated that legal certainty requires specific definitions that must establish distinct classifications between AI models and general-purpose AI systems. The experts supported a regulatory approach that targets AI applications instead of AI technology because its deployment risks create the main problems (Nikiforov, 2023).

The French government took charge of leading the European Union legislative process when it served as the Council of the European Union President in 2022. The French Presidency used the Slovenian Presidency's work to develop multiple draft compromise versions that handled essential

parts of the proposed regulation (Council of the European Union, 2022). The new framework established flexible criteria for high-risk AI systems. It reduced their regulatory burden on Small and Medium-sized Enterprises (SMEs) by easing data quality standards and technical documentation obligations. The French Presidency incorporated flexibility into its framework. It acknowledged that certain requirements, such as accuracy and data minimization for privacy purposes, could not be fulfilled. The French Presidency advocated for two main governance changes, which included giving the AI Board more independence through member state and expert representation and allowing member states to pick their own implementing entities with more freedom. The French Presidency supported lower penalties for small businesses and start-ups as they have a crucial role in the AI sector (Council of the European Union, 2022).

The French Presidency introduced new regulations for general-purpose AI systems, establishing shared accountability between GPAI suppliers and users who develop high-risk systems using these platforms. French legislators have strategically framed this AI act not merely as legislation but as a means to bolster European sovereignty (Wodecki, 2023). This rhetorical framing highlights to build trust while creating market competition and maintaining equal conditions for all participants in the AI value chain. The regulations underwent major changes to support innovation through enhanced definitions of AI sandboxes for testing and development, and by removing quality management system requirements for micro-enterprises (Council of the European Union, 2022).

The EU AI Act contains multiple French priorities through various compromises with other member states. The Act implements a risk-based system that divides AI systems according to the

risk they pose to health and safety and basic rights (European Parliament, 2024). The regulatory framework follows France's goal to create an environment that supports innovation through risk-based measures (Nikiforov, 2023). The Act includes provisions to promote innovation via AI regulatory sandboxes and real-world testing opportunities, which benefit both SMEs and start-ups (European Parliament, 2024).

Another main point is connected with the general-purpose AI models (foundation models). The initial stance of France, Germany, and Italy supported "mandatory self-regulation through codes of conduct" for foundation models to stay clear of full-scale regulation, yet the final Act established different levels of requirements for GPAI models (Reuters, 2023; Bareis, 2023). The agreement implemented the Commission's separation between "general-purpose AI models" and "general-purpose AI systems" (Kohn & Van Neerven, 2023). The developers of GPAI models need to establish technical documentation and disclose information about their training content to the public while following Union copyright regulations (Official Journal of the European Union, 2024). The requirement provides some transparency, but it reduces the level of regulation that France had initially wanted to avoid for its domestic AI champions (Wodecki, 2023). The Commission uses high-impact capabilities to classify GPAI models with systemic risk through training computation (Official Journal of the European Union, 2024). The AI Office serves to build Union expertise and capabilities for monitoring and enforcing GPAI model rules, which match the governance enhancements outlined by the French Presidency (Heiss, 2024 & Official Journal of the European Union, 2024).

The French government supported copyright protection but refused to disclose all training data because this would reveal manufacturing methods and harm French business competitiveness in the market. During dialogue negotiations among France, Germany, and Italy, documents show that France attempted to reduce disclosure obligations in the AI Act because it sought to defend its strategic market position through support for domestic champions at the expense of smaller competitors (Maggiore et al., 2025).

The French government took a firm position on biometric surveillance and law enforcement exceptions, which sparked considerable debate during the negotiations (Chee, 2023). The Act establishes a broad ban on using AI biometric identification in public areas but allows specific exceptions, which need judicial or independent administrative approval (Official Journal of the European Union, 2024). The French Presidency developed this intricate framework to grant law enforcement authorities operational flexibility (Council of the European Union, 2022). The member states maintain their authority to establish domestic laws that extend restrictions on the use of these systems. The French national discussion about AI surveillance systems continues, where civil society organizations criticized the French government's role for being less interested in surveillance. Paris Olympics 2024 serves as an example of a case where France was accused of undermining the fundamental rights. The French government enacted the Olympic and Paralympic Games Law to authorize certain video surveillance techniques in public spaces. This illustrated France's dedication to national security interests that at times conflicted with EU regulations regarding remote biometric identification (Lomas, 2023a).

It enacted the Olympic and Paralympic Games Law to authorize certain video surveillance techniques in public spaces. This illustrated France's dedication to national security interests that at times conflicted with EU regulations regarding remote biometric identification (Lomas, 2023a). The final Act creates a balanced framework that allows member states to retain some flexibility via particular exceptions that function under stringent judicial oversight (Official Journal of the European Union, 2024).

The final Act introduces several measures that aid small and medium enterprises, while reducing administrative burdens. Among these measures are the regulatory sandboxes and streamlined technical documentation forms (European Parliament, 2024). Furthermore, the Act establishes specific administrative fine structures that provide reduced penalties for SMEs and start-ups (Lomas, 2023; Council of the European Union, 2022). The provisions directly support France's mission to promote innovation while minimizing regulatory challenges for small businesses.

The French government actively worked against implementing complete oversight of foundation models because they opposed the European Parliament's plan to enforce regulations across all risk levels (Reuters, 2023; Kohn & Van Neerven, 2023; Bareis, 2023). The French Digital Minister Jean-Noël Barrot expressed that Parliament's stance was overly extreme as it would hinder European companies from building competitive generative AI systems. He supported regulations that oversee AI usage rather than the underlying technology itself (Reuters, 2023; Wodecki, 2023).

In conclusion, the EU AI Act demonstrates French influence through its dual mission to promote innovation and protect citizens by implementing a risk-based application-specific regulatory system that benefits small and medium enterprises (Nikiforov, 2023; Council of the European Union, 2022; European Parliament, 2024). The final text illustrates France's reluctance to impose stringent foundation model regulations, as seen in its acceptance of tiered obligations and the establishment of the AI Office. This reflects a compromise between regulatory ambitions and economic viability. Similarly, the document includes comprehensive provisions for law enforcement and biometric surveillance. It creates specific exceptions through robust protection mechanisms that safeguard fundamental rights while addressing national security requirements (Council of the European Union, 2022; Official Journal of the European Union, 2024).

5.1.5 Summary of National Position and Explanatory Factors

The government made consistent efforts to modify the Act to safeguard the interests of its national ecosystem, particularly the fast-expanding "French Tech" sector, and would also provide support to the overarching objective of achieving digital sovereignty in Europe. France's current situation can be traced back to three main factors: the country's internal political economy, its desire to lead European politics, and the manner in which it strategically presented the AI Act as both a legislative requirement and a political opportunity.

The internal political economy was of utmost significance. Since the beginning of its AI for Humanity initiative in 2018, the French government has invested significant resources into artificial intelligence. Artificial intelligence is an essential component in the process of upgrading industry and making France more competitive on a global scale (Villani, 2018). Due to the

availability of public funding, research facilities, and the encouragement of new businesses operating under the "La French Tech" banner, the French decision-makers desired regulations that were both flexible and conducive to innovation. Regulatory sandboxes and a more explicit definition of "high-risk" systems were two of the elements that French negotiators repeatedly requested over the course of the negotiations. It was believed in Paris that an artificial intelligence act that was too stringent might be detrimental to years of investment in France and could make it more difficult for European businesses to compete with businesses from the United States and China (OECD, 2022).

In the second place, France's stance was affected by its aspiration to be the leader in Europe. When it comes to matters of digital policy, France has long considered itself to be a champion of strategic independence inside the European Union. When Paris was in charge of the Council at the beginning of 2022, it was presented with a one-of-a-kind opportunity to become a policy entrepreneur. It was able to serve as an intermediary between the more conservative member states of Northern Europe and the more adaptable member nations of Southern and Eastern Europe. By lobbying for compromise solutions, France presented itself as both a guardian of "AI made in Europe" and a pragmatic dealmaker (Nikiforov, 2023).

Third, how the issues were presented in words was significant. The Artificial Intelligence Act has long been portrayed by French officials as not just a legislative need but also a strategic opportunity. It was emphasized that Europe has to construct its regulatory system that respects European values and assists European enterprises in growing (Ulnicane, 2022). The term "AI made in Europe" was significantly used in the French political discourse.

The French government worked to protect French innovation under the Act while pushing for worldwide standards to stop regulatory fragmentation. The specific combination of French domestic economic goals, European leadership ambitions, and discursive methods explains why France negotiated and chose its position regarding the Artificial Intelligence Act.

5.2 Germany's Position on the EU AI Act

5.2.1 Overview of National AI Strategy and Digital Policy

The German government established its AI policy based on practical economic needs and strong ethical and human dignity concerns (Hälterlein, 2024). Germany has traditionally placed significant attention on ethical issues in the context of digital policy. The ethical focus on basic law, which puts human dignity in first place (Art.1) is reflected in the constitution. Germany stands apart from other countries because of its unique combination of historical background and constitutional framework regarding technology. The combined effect of these elements determines how Berlin stands in relation to the legal framework for artificial intelligence in Europe.

Germany created a complete and developing Artificial Intelligence (AI) policy framework through its National AI strategy, which began in November 2018. The strategy was jointly established by the Federal Ministry of Education and Research, the Federal Ministry for Economic Affairs and Energy, and the Federal Ministry of Labour and Social Affairs. It aimed to position Germany and Europe as AI leaders while promoting ethical AI development for social benefits and complete AI integration into society through political actions and public dialogue. The November 2019 interim report showed the first year's progress of implemented measures, while the December 2020

strategy update incorporated fresh national and European, and international developments, which concentrated on research and transfer and application of knowledge, expertise, regulations, and societal aspects. The new projects started to concentrate on sustainability and environmental protection, climate action, pandemic management, and international and European partnership development (The European Commission, 2021-b). The OECD Artificial Intelligence Review of Germany (2024) evaluates Germany's AI ecosystem through international standards to assess its development and identify its core advantages and weaknesses, and potential opportunities and challenges (OECD, 2024).

The "Minds" pillar represents a fundamental element of Germany's AI policy, which focuses on human capital development (The European Commission, 2021-b; OECD, 2024). The strategy aims to transform both formal education systems and public training programs with a priority on educator development and public awareness to achieve high standards in AI education (OECD, 2024)

Initiatives include expanding learning platforms like the AI Campus, establishing more than 100 AI professorships, while the STEM Action Plan works to boost student participation in STEM subjects (The European Commission, 2021-b; OECD, 2024). The national skills strategy and AI trainer programs at Mittelstand 4.0 centres of excellence operate as government initiatives to provide advanced skills development programs in digital and AI domains for SMEs (The European Commission, 2021-b). The country has successfully drawn international AI talent but faces ongoing difficulties because of complex visa procedures and AI programs taught mainly in German, and insufficient, brief, flexible AI training options. The Skilled Immigration Act (FEG)

is expected to help resolve specific immigration obstacles that affect foreign workers (OECD, 2024)

The research sector of Germany seeks to expand its current successful base of operations. The country holds the fifth position globally for AI publication numbers while maintaining fourth position in research quality through its leadership in fields such as robotics, automation, computer vision, and natural language processing (OECD, 2024). Beginning in the year 2020, Germany has made significant modifications and additions to its strategy for AI applications. When the United States federal government made the decision to execute the AI Strategy Update in December of 2020, one of the reasons for this decision was a reaction to the COVID-19 outbreak, as well as the EU Recovery Fund initiative. The government created Competence Centres for AI Research to enhance both quality and efficiency through a minimum of twelve research centers and hubs (The European Commission, 2021-b; OECD, 2024). By the year 2025, the Federal Ministry of Education and Research (BMBF) had the financing boosted from three billion euros to five billion euros as a result of this particular modification. (OECD, 2024; Bundesministerium für Bildung und Forschung, 2023). The funding process for AI research involves multiple layers of complexity and bureaucratic procedures. Germany allocates less money per person compared to other peer countries. It is also worth mentioning that current AI research reveals a significant gender disparity. Female authors contributed to only 41% of AI publications in 2023. This highlights the need for targeted initiatives and inter-ministerial collaborations to address underlying structural issues (OECD, 2024).

More recently, Germany has been directing its efforts to high-performance computing, data infrastructure, and trust-based applications. The Digital Strategy 2030, which was introduced to the public in August 2022, included this priority as one of its major focuses. The JUPITER supercomputer, which was launched in 2023 and became operational in the Jülich Supercomputing Centre in 2024, is a showcase example. In Europe, it was the very first exascale system ever built. Through the JUPITER project, Germany has demonstrated its leadership in providing the computational power required for developing artificial intelligence and analyzing vast amounts of data (JSC, 2025).

Germany has established a human-centered AI governance framework within its regulatory system (The European Commission, 2021-b; OECD, 2024). The country has established ethical standards through Data Ethics Commission guidelines while adopting "ethics by design" as its approach. It is also worth noting that Germany works to create sector-based regulations and data ownership standards and implements cybersecurity protection measures. Standardization activities such as the German standardisation roadmap on AI work to create high-quality, secure, and interoperable AI products which enhance trust and competitiveness (The European Commission, 2021-b; OECD, 2024; The Federal Government, 2020). The development of regulatory sandboxes known as Reallabore will start testing new innovations, while a federal law about them should enter into force by 2025 (OECD, 2024; The Federal Government, 2020).

The German strategy for AI development focuses on creating technology that benefits society while following the principles of the Sustainable Development Goals (SDGs) (The European Commission, 2021-b; The Federal Government, 2020). The "Civic Coding - Innovation Network

AI for the Common Good" initiative creates a space for socially useful AI projects that work on cultural preservation, media content verification, and climate protection (OECD, 2024; The Federal Government, 2020). According to OECD (2024), German public opinion about AI remains favorable when it comes to healthcare applications, yet people worry about their personal data and fake news being spread. As an example, one can refer to DeFaktS and noFake initiatives of the German government, which fight AI-generated misinformation (OECD, 2024).

Germany also works to modernize its AI infrastructure by focusing on data management and computing systems (The European Commission, 2021-b; OECD, 2024). One example of this process is the GAIA-X project, which represents a Franco-German partnership to develop a secure data system. Another essential element is the functioning of world-class supercomputing facilities via the Gauss Centre for Supercomputing, which will achieve exascale computing power to bolster research activities and future AI needs (The European Commission, 2021-b; OECD, 2024; The Federal Government, 2020). The start-up and SME sector faces two main obstacles because it lacks access to infrastructure and needs specialized personnel to manage it (OECD, 2024)

Overall, Germany shows leadership in AI development through its human-centered ethical approach, but faces ongoing challenges to boost industrial adoption and match global funding levels and simplify regulations, and achieve digital and AI literacy throughout all social groups.

5.2.2 Federalism and the Division of Regulatory Authority

The federal structure of Germany plays a crucial role in establishing the approach through which the country controls information technology and artificial intelligence. The notion of federalism

alludes to the fact that the national administration (Bund) and the state administration (Länder) work together cooperatively. The government maintains significant control over multiple domains, including education systems, research activities, and personal data protection and economic policy development.

The Federal Ministry for Digital and Transport (Bundesministerium für Digitales und Verkehr, BMDV) and Federal Ministry of Research, Technology, and Space (BMFTR) are responsible for formulating policies on artificial intelligence at the federal level. They collaborate to develop national digital strategies, fund research, and establish new projects. Several ministries provide funding for research in the areas of robots, machine learning, and data-driven applications. The ministries also promote the creation of artificial intelligence start-ups and enhance enterprise competitiveness (BMBF, 2025). The Federal Ministry of the Interior (BMI) and the Federal Ministry of Justice and Consumer Protection (BMJV) frequently urge individuals to comply with the regulations, maintain high moral standards, and preserve the confidentiality of their personal information. Wagner (2021) and Helbing et al. (2018) note that this demonstrates that Germany has a strong legal tradition and that it is concerned about basic rights.

The regional governments at the state level (Länder) have a strong interest in investing in artificial intelligence initiatives, notably in the fields of research and education. In the case of Baden-Württemberg and Bavaria, for example, the construction of artificial intelligence competency centers and research clusters has been done through partnerships with local institutions and economic companies within the respective regions. However, North Rhine-Westphalia has developed funding programs to assist firms in incorporating artificial intelligence into their

production processes (Wernicke, 2021). These programs are intended to encourage businesses in their efforts to innovate. It is also worth mentioning that several German states (Länder) have created dedicated AI bodies, such as the Bavarian AI Agency, the Hessian Center for Artificial Intelligence (hessian.AI), and KI.NRW in North Rhine-Westphalia (OECD, 2024).

The municipal level and standardization framework operate as an additional component that enables pilot programs to become interoperable systems. The Model Projects Smart Cities program uses Länder funding to test AI solutions for transportation systems, public service delivery, and utility management in cities as experimental environments, which show both positive cost–benefit ratios and ethical compliance. Meanwhile, DIN/DKE committees together with Platform Lernende Systeme members convert these use cases into EU AI Act-compliant technical guidelines, reference architectures, and evaluation criteria. The sectoral data spaces, including Catena-X for automotive use, GAIA-X/IDS principles, to provide SMEs with standardized templates for joining the system and managing access and audit processes (Jobin et al., 2022)

Another aspect that contributes to determining Germany's approach to negotiations within the European Union is how power is shared between the federal government and the state governments. The Bundesrat, the upper house of Germany, is responsible for representing the Länder. It is actively involved in the process of making legislation that may have an influence on the rights of the states during the legislative process. As a result, careful and legally grounded opinions are often shared, aiming to protect both national and regional interests.

Due to the differing levels of authority held by ministries and Länder, a diverse array of stakeholders, from civil society organizations to various industry groups, can engage in the decision-making process. While this approach enhances the transparency of policies and aligns them more closely with societal values, it can also prolong the decision-making timeline and introduce additional challenges. There are situations where ministries aiming to foster innovation clash with those focused on ensuring compliance with ethical standards and data protection laws (Bodemer, 2023).

5.2.3 Key Themes in Germany's Position on Artificial Intelligence

Germany focuses on three main aspects regarding the EU AI Act. These include ethical governance, legal clarity, and social protection. With its reputation as a mediator of principle-driven, rights-based legislation that continues to be open to innovation, the Scholz government (2019-25) and later Merz government framed their AI strategy on the idea that has established itself as a leader in innovation. In contrast, France has emphasized competitiveness and European strategic independence. In the next two sections of the thesis, the study will delve deeper into the core principles that underpin Germany's approach. Fundamental rights, ethical artificial intelligence, transparency, accountability, and various safeguards for workers are among the issues being discussed in this context.

5.2.3.1 Ethical AI and Fundamental Rights

Germany has established a strategy that artificial intelligence systems ought to adhere to ethical values and uphold fundamental rights. According to DekaBank Deutsche Girozentrale (2023), politicians in Germany see artificial intelligence (AI) not merely as a topic in the scientific or

economic fields, but also as a challenge in the moral and societal areas, given that AI carries ethical and sociological implications. This approach, which is referred to as the *Menschenwurde*, is founded on the postwar constitutional commitment to human dignity, where moral commitment acts as the cornerstone. According to the German Federal Ministry of the Interior, the Ministry of Justice, and the Data Ethics Commission (DEK, 2019), artificial intelligence systems that are perceived as dangerous ought to be subjected to stringent monitoring. These concern the systems that have an influence on surveillance, biometric identity, or social scoring.

There are a number of drivers that have shaped the development of this ethical framework. These are the encouragement of risk-based classifications, mandatory impact assessments, and strict compliance with data privacy regulations as outlined in the General Data Protection Regulation (GDPR). During the negotiations, Germany's negotiators have asserted that "trustworthy AI" is a precondition for societal acceptability, market legitimacy, and sustained competitiveness (Ulnicane, 2022). The decision made by Germany to include ethics in this context emphasizes human control, fair practices, and appropriate measures over boundless technological exploration. Additionally, it addresses issues such as the preservation of social cohesiveness, the establishment of democratic processes, and the avoidance of algorithms from discriminating against individuals. Normative approach, which has played a large role in formulating the need, has considerably impacted the demand for enforceable duties linked to high-risk artificial intelligence providers and users in Germany. Consequently, this promises that the EU AI Act will continue to be credible and defensible in member states that have a long history of preserving civil and social rights (Gstrein, 2022).

5.2.3.2 Transparency, Accountability, and Worker Protections

Employees who are affected by artificial intelligence should be provided with safeguards, should be held accountable for their actions, and should be transparent about the nature of their job, according to Germany's stance. According to the statements made by policymakers and stakeholders in Germany, it is of the highest significance for artificial intelligence systems to have the capability of being interpreted, audited, and responsible (Sharbaf, 2022). This is especially true for artificial intelligence systems that are employed in the manufacturing of industrial products, the management of logistics, or the decision-making process for administrative concerns.

The labor regulations and industrial relations frameworks of Germany prevent automation from violating worker rights or blocking employee participation in decision-making processes (Wagner, 2021). German negotiators have supported provisions in the Artificial Intelligence Act that require transparency for automated decisions affecting employees and provide access to assistance and implement accountability measures to ensure human oversight of AI-assisted processes (European Parliament, 2024). The purpose of these measures is to guarantee that both parties will continue to exercise control over the operational procedures that are aided by artificial intelligence.

Germany's willingness to support documentation requirements, technical logs, and conformity evaluations for high-risk artificial intelligence systems demonstrates the country's strong commitment to transparency and accountability. There are a couple of benefits of this approach to consider. The protection of people and employees stands as the first benefit, while the second advantage includes simplified legal procedures that enable easier technology deployment across international boundaries (Helbing et al., 2018). These regulations achieve two objectives: first,

they protect people and workers, and second, they simplify the legislation for public understanding.

Overall, Germany aims to build a reliable artificial intelligence system that is based on moral principles and legal rights. It makes use of values such as transparency, accountability, and worker protections in order to make these ideals are both legally obligatory and practically applicable.

5.2.4 Germany's Influence on the EU Artificial Intelligence Act

The EU AI Act received major input from Germany, which collaborated with France and Italy to support particular AI regulatory approaches. The German government focused on creating equilibrium between technological advancement and safety protocols for foundation models and AI applications, and biometric surveillance practices (Nikiforov, 2023).

The December 2023 provisional AI Act agreement between EU member states received opposition from Germany, France, and Italy because of their concerns about the strict rules for large foundation models, which raised doubts about the final version of the Act (Akin, 2023; Council of the European Union, 2024). The unexpected political shift of major powers threatened to either block the Act from passing or extend its implementation timeline (Nikiforov, 2023; Kohn & Van Neerven, 2023).

Germany, together with France and Italy, maintained their position that the AI Act would create competitive challenges for European innovation. It supported an approach that would maintain balance between innovation protection and risk management while minimizing regulatory

obstacles for businesses (Nikiforov, 2023; IT, FR, & DE, 2023). The main point of Germany's stance was that the AI Act should focus on AI usage and deployment instead of controlling the technology base (Nikiforov, 2023; Krüger, 2025). The group maintained that AI system risks emerge from their deployment rather than their fundamental technological structure. The proposal differed from previous drafts, which considered imposing wide-ranging restrictions on AI technology.

The AI Act requires more stringent rules when AI systems present higher risks to society (Official Journal of the European Union, 2024). The Regulation works to enhance internal market operations through human-centered trustworthy AI systems, which protect society at high levels while fostering technological progress. The Act establishes four risk categories for AI systems, which place the most demanding regulations on "high-risk AI systems" in line with their intended function and deployment context (Krüger, 2025). This aligns with Germany's preference to regulate applications rather than the technology itself.

Germany expressed its opposition to the European Parliament's initial proposal, which required foundation model developers to undergo third-party expert testing regardless of their intended application (Kohn & Van Neerven, 2023). The European Parliament's first draft required foundation model developers to conduct third-party expert testing for all their models, regardless of application purpose. The three countries rejected this method by taking a separate stance from it (Nikiforov, 2023).

The proposed regulations encountered resistance because stakeholders thought they would restrict innovation and create major market challenges for European AI companies such as Aleph Alpha from Germany and Mistral AI from France against their US-based competitors (Henshall, 2023; Kohn & Van Neerven, 2023). Digital Minister Volker Wissing of Germany stated that implementing strict rules for large foundation models would create an unfair market situation (Akin, 2023; Klöckner et al., 2024). The German Chancellor Olaf Scholz and French Finance Minister Bruno Le Maire shared their worries that excessive regulatory measures could harm innovation (Henshall, 2023). The German AI Association emphasized that European FMs should maintain their commercial value through "made in Europe" by avoiding high costs and trade secret disclosure risks. The organization requested definitions for "foundation models" and "general-purpose AI" to achieve clarity (German AI Association, 2023).

With the joint non-paper with France and Italy, Germany supported "mandatory self-regulation through codes of conduct" instead of implementing strict binding rules and third-party testing. The codes would operate under G7-defined principles from the Hiroshima process to provide transparency and value chain information flow and protection against abuse. It advocated for "model cards" to become a required component of self-regulation because they would disclose details about particular models (Nikiforov, 2023). Germany initially supported the idea that organizations should be exempt from penalties for violating these codes of conduct. However, it later shifted its position to endorse possible sanctions under the AI Act (Long, 2023; Henshall, 2023).

The final Act used a balanced method to accept some of these preferences. The Act establishes the definition of "general-purpose AI model" (GPAI model). It establishes different regulatory standards for general-purpose AI models and models that create "systemic risks" through more demanding oversight of the latter. The AI Office needs to establish Union-level codes of conduct, which will assist organizations in following the Regulation correctly for GPAI model implementation. The codes must include requirements for documenting capabilities and risk assessment methods, and serious incident reporting procedures. The Act requires model documentation that matches the concept of 'model cards,' although it does not use this specific term. The Act requires GPAI model providers to follow recommended codes of practice but also establishes specific obligations related to technical records and information disclosure with subsequent actors, copyright compliance, and public disclosure of training content. The free licensing framework for GPAI models eliminates certain transparency requirements except when they create systemic risks. The Act defines particular sanctions that must be applied in case of non-compliance with the GPAI model obligations (Official Journal of the European Union, 2024).

The new German coalition government, consisting of Social Democrats, Greens, and Liberal Free Democrats, actively backed a ban on the deployment of biometric identification technologies such as facial recognition systems (Heikkilä, 2021). The coalition worked to ban biometric recognition in public areas and automated state scoring systems through European legal frameworks. The German position received substantial attention because it might affect other EU member states (Heikkilä, 2021; EDRI, 2021). German officials expressed their willingness to block the AI Act because they believed the law did not completely ban biometric surveillance (EDRI, 2024). The EU Parliament included a total restriction regarding the use of real-time biometric recognition

technologies in public spaces in their June 2023 draft because they shared the German government's concerns about privacy and mass surveillance (Long, 2023).

The negotiations resulted in an amendment that allowed law enforcement to access these technologies during particular high-risk situations (Long, 2023). The French government sought to establish a wide-ranging national security exception for surveillance technology during the 2024 Olympics. The agreement reached a middle ground between the two positions (Long, 2023; EDRI, 2024)

The Act permits specific restricted cases of biometric identification when certain measures fulfill a substantial public interest that exceeds the identified risks. It allows exceptions for specific cases, such as locating missing persons, tracing individuals who constitute a danger to life or security, and individuals guilty of grave crimes that carry at least four years of imprisonment. The law enables Germany to establish its own strict national ban when needed because of its preference for strict regulations. The Act restricts the application of AI technologies for risk analysis of people through profiling or personality analysis to predict criminal behavior, except for risk analysis that does not use individual profiling (Official Journal of the European Union, 2024).

Germany emphasized the need to eliminate excessive administrative requirements that would promote digital market competition and innovation. The European smaller AI providers faced difficulties with compliance because they operated against larger US-based competitors (Nikiforov, 2023; Henshall, 2023). The Regulation includes various provisions that eliminate regulatory barriers to support innovative practices. It requires the member states to create AI

regulatory sandboxes that serve as testing grounds for innovative AI systems under close regulatory supervision. The sandboxes function to provide legal clarity while speeding up market entry for small businesses and new companies (Official Journal of the European Union, 2024).

In conclusion, Germany worked together with France and Italy to shape the EU AI Act through their combined efforts. The final Regulation shows evidence of their efforts to create an innovation-friendly framework based on risk assessment, which focuses on AI application control rather than technological restrictions for general-purpose AI models and their opposition to real-time biometric surveillance. The Act maintains some of its relaxed proposals through voluntary codes of practice and SME support and risk management systems, but it does not adopt all of them. The Act contains provisions for voluntary codes of practice, as well as support for SMEs and risk management systems. Member states have the option to introduce more stringent national laws regarding biometric identification, reflecting Germany's stance.

5.2.5 Summary of Position and Institutional Drivers

Germany's stance on the EU Artificial Intelligence Act represents a thoughtful effort to reach the objectives of ethical governance, legal clarity, and economic competitiveness. Germany has consistently backed artificial intelligence regulations to protect fundamental rights. The plan follows a different approach than France's, which focused on developing national technical champions and European strategic autonomy. The current stance of Germany is influenced by a combination of factors, including cultural, historical, and economic legacies, as well as the functioning of its institutions.

Wagner (2021) notes that Germany considers artificial intelligence (AI) to be a societal issue rather than only a technological or economic one. The federal system of Germany is a major factor that influences the country's position. Its multi-level framework places a focus on discussion, legislative clarity, and procedural safeguards (Wollmann 2024). Federal ministries and the governments of the Länder are jointly responsible for all tasks that pertain to the governance of artificial intelligence. While ethical rigor, industrial expansion, and the ability of the federal government to carry out the plan are conflicting issues, it is vital to carefully negotiate views that strike a balance between these opposing demands to achieve a satisfactory outcome.

In connection with the economy and business, it is considerably important to German policymakers and industry associations to have a balanced approach since the country's economic structure is mostly made up of huge industrial organizations and small and medium-sized enterprises. Artificial intelligence has brought changes in the production, transportation, and maintenance of things; however, policymakers are also concerned about ensuring that the use of AI does not undermine at the expense of workers' rights or the confidence that society has in them (Bodemer, 2023).

The national stance of Germany is produced by a variety of institutional elements that are intertwined with one another. These variables include strong ethical and normative values, the complexity of the federal government, economic concerns, and strategic discourse. An approach that frames the issue in a way that is both discursive and strategic. The strategic framing that takes place at EU meetings is one of the factors that helps to strengthen Germany's position. At the same

time, Germany would achieve its dual goals of protecting rights and enhancing industrial competitiveness through these measures.

5.3 Comparative Analysis

5.3.1 Political System and Institutional Arrangements

The establishment of preferences, their expression, and the negotiation of preferences are all governed by institutional structures. A complete grasp of French and German political systems and institutions enables us to understand their different positions regarding the EU AI Act. In France, the semi-presidential system gives a large degree of political authority to the President. The President is backed by the executive administration, which is responsible for providing guidance and assistance. The centralization of artificial intelligence policy allows organizations to communicate strategic objectives swiftly and clearly (Brattberg et al., 2020). These strategic objectives encompass not only the pursuit of technological sovereignty but also the cultivation of domestic leaders in artificial intelligence.

The President's strategic vision sets the foundation for the Ministry of Finance and the Ministry of Digital Economy to collaborate on artificial intelligence initiatives and national positioning. This top-down approach facilitates straightforward decision-making, implements industrial policy consistently, and offers a cohesive narrative across EU forums. It could render industrial strategy more pertinent than the ethical or labor concerns linked to the workplace, as noted by Pollet (2022).

The German government functions through a federal parliamentary system, which divides power between multiple governmental levels that follow a sequential structure. Governance of artificial

intelligence is the responsibility of several entities, such as federal ministries, including the BMDV, BMI, and BMBF, regional governments (Länder), and oversight committees such as the Bundesrat (Bran et al., 2019; Wollmann, 2024). Together, these entities are tasked with ensuring that artificial intelligence is utilized in a way that is fair and just. Consequently, this decentralization creates a need for discussion and cooperation among various levels of government and ministries, which ultimately leads to policy positions that are more careful and thoughtful. It is important to note that while these two systems are very different from one another, they are working together to bolster the development of artificial intelligence policy in Europe (Helbing et al., 2018; European Parliament, 2024).

5.3.2 AI Governance Philosophies: Ethics vs Innovation

According to the French government, artificial intelligence has the potential to transform international competition and geopolitics. The French government views artificial intelligence as both an economic asset and a weapon for geopolitics. Comparable to this perspective is the greater desire of the French government for industrial and digital autonomy. As a result, notions such as leadership, sovereignty, and competitiveness are often intertwined in different contexts. For instance, phrases such as "AI Made in Europe" illustrate how these concepts are merged in political discourse.

The concept of artificial intelligence governance in Germany, in contrast, emphasizes ethical considerations, transparency, accountability, and societal trust more than simply focusing on competitive issues. In Germany, the approach regarding artificial intelligence is based on constitutional obligations to fundamental rights, known as Grundrechte. Furthermore, the

suggestions from organizations like the Data Ethics Commission are also taken into account. (Ulnicane, 2022). The phrase "Responsible and Trustworthy AI" positions the country as a leader within the European Union (EU), enabling it to push for regulations that incorporate ethical principles into legislation while still permitting the safe and regulated use of artificial intelligence in industrial settings.

It is necessary to be familiar with these two distinct organizational styles to comprehend not only the structure but also the content of the Artificial Intelligence Act of the European Union. Because France places such a significant emphasis on innovation, the Act is intended to foster both strategic independence and competitiveness. Germany places such a significant emphasis on ethics while ensuring that the Act takes into account considerations such as responsibility, openness, and the protection of rights. The regulatory framework of the EU AI Act emerges from the combined effects of these concepts.

5.3.3 Role in EU Legislative Process

The EU has proven its international leadership through the adoption of this powerful AI regulation, which defends essential rights while addressing various AI system threats. To avoid placing regulatory burdens on their domestic AI companies, Germany and France initially opposed broad regulatory measures and advocated self-regulation via a code of conduct. The progress achieved through 2023 faced potential disruption because of an exposed intergovernmental document. The November 20th, 2023, joint non-paper from France, Germany, and Italy revealed their core European position regarding AI regulation. The document gained rapid media attention because it suggests moving toward more lenient rules for foundation models (Nikiforov, 2023). Such a policy

shift could endanger the success of the whole effort at risk (Kohn & Van Neerven, 2023). Amnesty International (2023) noted that France and Germany should resist industry demands that the law will create excessive regulatory barriers for innovation. In response, the European Commission introduced a new text which offered a compromise. It maintained the tiered system but established less stringent regulatory requirements (Kohn & Van Neerven, 2023).

Germany and France's impact on the EU AI Act can be compared via their positions on four core themes: foundation model, copyright issue, concerns related to the impact on innovation, and critical security exclusions.

On foundation model: Based on the definition put forward by the EU Council in November 2023, a foundation model refers to "a large AI model that is trained on a large amount of data, which is capable to competently perform a wide range of distinctive tasks, including, for example generating video, text, images, conversing in lateral language, computing or generating computer code" (Kohn & Van Neerven, 2023). France maintained a clear stance regarding the foundation model. The French government blocked all attempts to establish horizontal regulations for the foundation model. Since France has a global ambition to compete with world-leading AI companies like OpenAI or Google, this aspiration was in conflict with France's approval of the EU AI Act. "It's not a good idea to regulate foundational models more than other countries," President Emmanuel Macron described large software programs that generate text or images as the basis for services like ChatGPT (Piquard, 2024). Mistral actively opposed the implementation of any regulatory framework for foundation models within the AI rulebook. Cedric O, who served as France's state secretary for digital economy, endorsed Mistral's position by stating that the AI

Act would negatively affect the French company (Afp, 2023). Overall, the new approach would let startups expand their operations without dealing with what they viewed as excessive regulatory costs. Hence, France sought to prevent any specific regulations from being applied to foundation models.

Germany also shared these concerns, but its approach was initially more risk-based. The German government received pressure from its leading AI company Aleph Alpha, which maintains strong ties with the German political establishment. German AI companies, including Aleph Alpha, expressed worry that EU regulatory requirements would create competitive disadvantages against their US and Chinese market rivals (Bertuzzi, 2024). BMWK stated that powerful AI models that demonstrate systemic risk would face enhanced regulatory requirements. In addition, the development of special rules for generative AI systems would be necessary to control general-purpose AI models that produce textual and visual outputs (BMWK, 2024).

To sum up, the French government opposed strict regulation because it wanted to develop domestic champions. Germany adopted a distinct method through which it accepted particular EU regulations that focused on controlling the biggest non-EU models.

On the copyright issue: One can note that Germany and France possessed the same position, but their motivation seems different in the copyright issue. "We need to find other ways of ensuring that it is respected, without making the manufacturing secrets of AI models public," said the former Economy and Finance Minister of France, Bruno Le Maire's staff (Piquard, 2024b).

The AI Act demands that software developers disclose all training data they utilized for their software development through a complete summary. This would grant copyright holders the means to verify if their written or visual works are contained within it, so that they can request removal or settle financial compensation (Piquard, 2024). France's negotiation documents, disclosed by Investigate Europe, show that EU member states advocated for less stringent measures, but France feared losing a competitive advantage on details of data training that would put them at a disadvantage (Maggiore et al., 2025).

Germany's view on copyright transparency aimed to protect its national companies. It is believed that the implementation of transparency measures will enable small and medium-sized enterprises (SMEs) to access AI technology more easily. Germany's stance outlines particular requirements and objectives for both SMEs and startups. For instance, the Federal Government established rules for regulatory sandboxes, which provide freedom for testing innovative solutions (BMWK, 2024).

To sum up, France and Germany both made efforts to prevent AI companies from disclosing their data. However, the French government based its position solely on protecting corporate information for international market competition. On the other hand, Germany endorsed the compromise by supporting a framework that creates a balanced system which protects rights holders and small businesses while enabling major AI developers to operate effectively.

Regulation vs innovation: Krüger notes that while Germany prioritizes innovation and societal awareness, the EU AI Act establishes a harmonized regulatory framework for that purpose (2025).

The EU's capability to regulate foundation models stringently has led German firm Aleph Alpha and French start-up Mistral to fear losing their competitive advantage to American and Chinese rivals.

France focused on the competitive disadvantage of AI rules during the 2020-2024 period of EU AI Act adoption. President Macron emphasized that AI technologies require universal basic regulations that must span across all continents to stop legal disputes between nations. The President noted that AI technology bans would not occur based on country of origin, while he supports establishing basic safety standards for all AI systems (Moille, 2025). The French government also supported enhanced regulations that would focus on the most influential AI systems, which affect society the most. As a result, such changes would mainly impact leading non-European AI providers (Kohn & Van Neerven, 2023). France took an approach to regulating the uses, rather than regulating the technologies (Afp, 2023).

According to BMWK (2024), Germany sought to align innovative development with risk prevention. Federal Minister of Justice Marco Buschmann declared that this legal framework stands as the world's initial AI regulation because Europe leads the way through the AI Act (BMWK, 2024). That said, it is also clear that the field of AI requires continuous monitoring and evaluation of its current developments. This is the only way they will be able to continue to ensure the balance between ensuring innovation and protection from possible risks (BMWK, 2024).

To sum up, two countries preferred self-regulation via a code of conduct regarding foundation models instead of creating mandatory regulatory frameworks. France strongly focused on the

"innovation" part of the issue because it believed regulatory measures would harm its leading companies. Germany demonstrated equal interest in its industrial sector but believed that appropriate pioneering regulations would create strategic advantages.

Critical security exclusions: Compared to the aforementioned themes, security exclusions present a very important point where France and Germany have the most fundamental differences. France actively campaigned for national security exemptions when EU member states worked on the EU AI Act (Maggiore et al., 2025). Ambassadors of 27 EU member states met in COREPER for a meeting of the Council of the EU on 18 November 2022. Maggiore et al (2025) notes that the French representative expressed absolute clarity regarding what France wanted to achieve: “The exclusion of security and defence ... must be maintained at all costs.” The proposal stated that military forces would have exclusive authority to perform surveillance operations in public areas. In short, the French government requested complete exemption from AI regulatory oversight for all public entities when “national security” required it (Maggiore et al., 2025).

On the other hand, Germany underlined the importance of fundamental rights in the first place. The German government maintained its stance throughout the negotiation process while making every effort to establish a powerful ban on biometric surveillance during the crucial final stages of talks. It also lobbied against the AI-driven social scoring or affect recognition tools in professional settings in Europe (Aszodi, 2022). One can note that the final version of the AI Act reflects this viewpoint. The Act creates detailed rules to monitor biometric recognition technologies while making all national biometric surveillance activities illegal (BMWK, 2024).

To sum up, it is possible to mark a clear contrast between the views of France and Germany regarding the possible security exclusions. The French government worked to establish wide-ranging exemptions that would let state security organizations use AI systems without any restrictions. In comparison, Germany pursued an equally forceful approach to establish definitive legal restrictions with the aim of defending basic rights of citizens from invasive AI surveillance methods. The fundamental reason behind this difference stems from the political traditions that exist between these two countries.

Chapter 6: Conclusion

The EU AI Act is viewed as the first comprehensive legislation on AI globally, gaining significant appreciation in European countries while also sparking widespread debate around the world. This study aimed to investigate France and Germany's positions regarding digital leadership and various national issues at the negotiation table. The research used a comparative qualitative case study between France and Germany by examining historical institutionalism, various actors, current institutional forms, national security priorities, and multiple concerning issues in both countries. It also counted on political economy and the core governing philosophy of national interests. The French government promotes pro-innovation, less regulation, more sovereignty over copyrights, and national security issues. On the other hand, Germany emphasizes a citizen-oriented, rights-based, and risk-averse approach. Both countries addressed concerns that ethical safety and fundamental rights should not hinder innovation and competitiveness with other global giants.

One of the critical findings stated that France positioned itself as a strategically ambitious country to build "AI made in Europe", which also reflects how France sees itself as an AI leader in Europe.

France has a centralized government system with a dirigiste tradition, which aims to avoid a regulatory burden and prioritize its national champion, such as Mistral AI, so that it can compete with US and Chinese giants. It believes that a competitive advantage will help enhance its role in the global AI field. It is evident in its strong opposition to horizontal rules for foundation models, as well as negotiations pushing for copyright transparency decrees and border national security exemptions. On the contrary, Germany makes its decisions through a federalist and ordoliberal approach. It always emphasized legal clarity, bureaucratic stagnation, ethical guarantees, and consumer-oriented policy. Germany is committed, on a constitutional basis, to maintaining citizens' fundamental rights; this is reflected in the strong opposition to state surveillance in the AI Act. It raised voices against biometric mass surveillance and positioned itself against strict and risk-based classification systems, which would open the door to the production of such technologies under the guise of safeguarding citizens.

The theoretical framework aimed to explain the study's findings. For example, historical institutionalism explains France's state-driven approach to industrial policies, while Germany focuses on a rules-based, complex bureaucracy that highly follows the ordoliberal model. Economic aspirations also heavily influenced their decision-making. France wanted to focus on a mixed market economy with capital maximizing and creating some anchor-level industries. Germany is an economically sophisticated country that has tried to adhere to rules through a coordinated market economy. Additionally, it focused on various regulations to support a diversified economy. Finally, it tried to discuss the techno-national and digital sovereignty position of both countries. France's ambitious offensive sovereignty focused on strategic autonomy and

aspired to global power. Germany's more defensive approach is concerned with rights-based societal values and protecting its market from any external interference.

Based on the research questions, the study can conclude with the following findings:

1. The differing perspectives of France and Germany concern one of the core issues in negotiation: how they see themselves on the global stage. This digital legislation process is divided into innovation and safety. The AI Act also reflects the stance of other member states at the EU level.
2. Among all other distinctions, primary approaches were regulating foundation models, copyright transparency, and security exemption. Additionally, France prefers to be an international competitive player, while Germany focuses on citizen rights and legal certainty.
3. The AI Act's ultimate success hinges on the EU's various balancing positions and its implementation across member states. The Act fundamentally shaped AI regulation worldwide; it does not pose as a pure "European" model, but in a mixed way. It stated that it was innovation-friendly measures with strong ethical safeguards.
4. The institutional structure is critical for both countries. For example, the French government is shaped by a centralized system, which helped them to be comprehensible, flexible, and determined in the negotiation process. At the same time, Germany's federal system required bureaucratic negotiations, which helped them to be more cautious, legally firm, and risk-focused.
5. The broader narratives of "strategic autonomy" (France) and "ethical AI" (Germany) served as catalysts to shape the EU AI Act. It also helped other member states to think more

critically about their national priority. Nevertheless, all of the above, they passed over their personal interests and focused on more European-centered approaches, which also gave them more credibility among other member states and bargaining power.

The policy implications of this study are significant. There is always tension in EU policymaking processes, especially among major countries like France, Germany, Italy, and others. Additionally, the internal governance of other member states plays a role in these legislative issues. However, in the new era of digital legislation, it will be a landmark after GDPR, which shows how various countries can think about their national interest and intersect with the European interest. Also, AI Act's comprehensive implementation will require a series of dialogues, building consciousness, and technical alignment to tackle any division among industries and actors. For member states, government institutions need to be more active and less complex in terms of self-awareness. The industry needs to follow laws and other ethical principles for regulations. For civil society, human rights and citizen concerns need to be addressed on any harmful innovation, which helps to make surveillance easier. This Act was formed to be more vigilant in protecting national interests and citizens' rights.

This study has some limitations. The primary sources of the study included various press statements from the EU, journal articles, news, opinions, and analyses from think tanks. While robust, it may not be enough to capture the entire negotiation process. Because most of them were behind closed-door discussions, and various lobbies were influential. Those informal bargaining sessions were reflected in some think-tank or opinion pieces, but were limited in scope. Apart from this, as the AI Act is relatively recent and has just entered into force, this study was concluded at

the end of the negotiation phase. To gain more practical insights into the implications, further study is needed into the various phases of the implementation process and reactions from different countries. Additionally, industries are still in a growth stage. Once they develop and become more involved in data-centered and copyright issues, we may see more scenarios of the AI Act.

The study also opens several windows for future research, such as sector-based analysis of various AI innovations and the intertwining of regulation in healthcare and automotive. Additionally, in the policy implications area, it is noted how France and Germany enforce the AI Act and create accountability for the rising industries. Further work would assess the role of other member states in addressing citizen privacy concerns, democratic accountability, and foreign investment in AI development, as well as their coordination with EU regulations. Finally, there is a phenomenon known as the "Brussels effect" on European regulation that extends to other non-EU countries. In this regard, future research should investigate how these dynamics influence regulatory convergence and strategic responses in major jurisdictions such as the US and China.

To sum up, the study analyzed the EU AI Act as a journey of tests to see a future robust digital technology regulation framework at the EU level. The process was heartily engaged in a long, intense, and complex European project. The negotiations between France and Germany are not only conflictual or divergent, but also aim to produce more market-driven and national interests, which will help the EU make more democratic decisions. Although they hold different views, in the end, they recognize that it has been the voice of every member state that has helped them concentrate on more resilient and balanced regulation. The AI Act has created a buzz around the world about how Europe is perceived as being more focused on regulation rather than innovation

(Csernaton, 2025). However, through the final version of the Act, it also raises a new consideration: it is not just about innovation, but also about collaborating with diverse groups of people with single mandates. It centered around France's powerful digital Europe and Germany's vision of right-based technology, which makes it a landmark achievement in Europe.

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