

# The Anatomy of Engagement: Croatian Interest Groups and the EU Artificial Intelligence Act

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EU Artificial Intelligence Act

MASTER THESIS

Zagreb, 2024.

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MASTER THESIS

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Zagreb  
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**Nikola M. Noršić**

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## 1. Introduction

The European Union's Artificial Intelligence Act represents a first-in-the-world form of comprehensive AI regulation. The Act aims to create a harmonised legal framework across the EU by categorising AI systems based on their risk levels and imposing stringent requirements on high-risk applications to ensure that AI technologies are safe, transparent, and aligned with European values (European Commission, 2024a). By regulating AI comprehensively, the AI Act is positioned not only as a crucial piece of legislation within the EU but also as a global benchmark for AI standards, leading to a “Brussels Effect” that affects AI regulation worldwide (Siegmann & Anderljung, 2022: 3-4).

In 2023, the global artificial intelligence market was valued at over €130 billion and is expected to grow significantly, reaching nearly €1.9 trillion by 2030 (Statista, 2023). This expected growth, whether it will be realised or not, underscores AI's transformative potential across various sectors, as countries and companies around the world invest heavily in AI development. The United States leads in private AI investment, with €62.5 billion in 2023, followed by China with €7.3 billion. The European Union and the United Kingdom collectively attracted €9 billion in private AI investment during the same year (Stanford University, 2024). Between 2018 and the third quarter of 2023, the EU saw nearly €32.5 billion invested in AI companies, compared to more than €120 billion in the United States (Europarl.europa.eu, 2024).<sup>1</sup> This data highlights the growing importance of AI in driving global economic growth and the competitive landscape of AI investment across different regions.

Within the EU, AI is seen as a critical component of the continent's digital strategy. This strategy aims to position the EU as a global leader in AI innovation while ensuring that its development aligns with European values such as privacy, security, and transparency. The EU Digital Europe programme will fund AI with a total of €2.1 billion between 2021 and 2027

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<sup>1</sup> Considering the US investments in AI, the European Commission's commitment of over €65 million seems rather inconsequential. Of this, €50 million is earmarked for projects aimed at enhancing the capabilities of large AI models and exploring innovative methods for data integration, which are crucial for expanding AI's applicability across various domains. An additional €15 million is allocated to the development of robust and transparent AI systems, focusing on improving the reliability and alignment of AI technologies with the AI Act and the human-centric approach that Europe advocates. While these investments are important, they highlight the stark contrast between the EU's efforts and the much larger investments being made globally, particularly in the private sector (European Commission, 2024e).

(Europarl.europa.eu, 2024). Despite the mentioned private and public investments, the EU faces challenges in keeping pace with other global leaders like the United States.

Although smaller in size compared to major EU economies, Croatia has made notable strides in the AI sector. A study conducted in 2023 revealed that a substantial 92% of Croatian businesses recognize AI as an important component of the modern business environment, with a similar percentage acknowledging the importance of investing in AI to remain competitive. The same data shows that 50% of Croatian businesses are actively using AI, with the most common applications being data analytics, chatbots, and process automation. This adoption is yielding tangible benefits, with significant time and cost savings reported by 84% and 64% of respondents respectively (Hrvatska gospodarska komora, 2023). However, the study also highlighted that more than two-thirds of these businesses have yet to develop a comprehensive strategy for implementing AI-driven changes (Hrvatska gospodarska komora, 2023). This indicates a gap between the awareness of AI's importance and the bigger practical steps needed to harness AI potential fully.

In terms of AI products, the Croatian market is still developing, but it is far from underdeveloped. As of 2022, Croatia was home to over 130 AI startups, alongside domestic tech giants Infobip and Rimac, both of which have achieved unicorn status (a valuation at over US\$1 billion). These companies are at the forefront of AI integration, with Infobip leading in global communications technology and Rimac pushing the boundaries in autonomous driving. The 2023 acquisition of the Croatian startup Photomath by Google, a Big Tech giant and a global leader in AI, further underscores the growing importance and potential of the Croatian AI sector (CroAI, 2022).

The AI Act is part of the EU's broader strategy to regulate emerging technologies, complementing other key regulations such as the Digital Services Act (DSA) and the Digital Markets Act (DMA). Together, these regulations form an integrated framework aimed at fostering a secure, equitable, and innovative digital environment in the EU, ensuring that AI technologies are not only cutting-edge but also ethical and transparent (European Commission, 2024c). However, the process leading to the Act's passage has been fraught with challenges, particularly from Big Tech, which has leveraged its resources to influence the legislation, raising concerns about whether the AI Act will effectively address the risks associated with advanced AI systems (CorporateEurope, 2023b). In other words, interest groups have been integral to the legislative process of the AI Act, which reflects their broader role in EU



policymaking. These groups include companies, business associations, NGOs, think tanks, lobbying firms, and other relevant policy stakeholders. Historically, interest groups have played a significant role in shaping EU regulation, as seen in the development of the General Data Protection Regulation GDPR, where various groups contributed to the discourse on data privacy and security. The AI Act, much like the GDPR, has seen substantial input from interest groups, particularly from the tech industry, which has actively engaged in the legislative process to influence the final provisions of the Act (Tallberg et al., 2024; CorporateEurope, 2023a, 2023b).

As artificial intelligence continues to shape industries and societies, understanding the influence of interest groups in shaping AI policies like the AI Act becomes increasingly important. Although much research has been done on interest groups lobbying in the EU (see Eising, 2007; Bouwen, 2009; Klüver, 2013; Lowery et al., 2015; de Bruycker, Berkhout, & Hanegraaff, 2018; Dür et al., 2019), and even on interest groups landscape regarding the AI act (see Tallberg et al., 2024), none has been specifically focused on Croatian interest groups lobbying the AI act. While Vidačak (2024) has offered a fuller picture perspective on Croatian interest groups engagement with the EU regulation, this research's particular area of interest remains underexamined. By focusing on this niche, the research promises to provide a unique contribution to the existing literature by shedding light on the strategies of influence and the relevance of Croatian interest groups' lobbying in the EU's legislative landscape. This exploration is important not only for understanding the dynamics of smaller member states within the EU but also for assessing the broader implications of their participation in shaping crucial policies like the AI Act.

Therefore, this thesis focuses on Croatian interest groups' involvement in the legislative process of the EU Artificial Intelligence Act. The primary research question guiding this thesis is: How have Croatian interest groups engaged with the legislative process of the EU Artificial Intelligence Act? This overarching question is broken down into several subsidiary questions:

1. What strategies have Croatian interest groups employed to influence the legislative process of the EU Artificial Intelligence Act?
2. How do these groups perceive the effectiveness of their engagement efforts?
3. What challenges and opportunities have Croatian interest groups encountered in their lobbying activities?

In trying to answer the above-mentioned questions, this research uses a mixed-methods approach that combines document analysis with qualitative expert interviews to explore how Croatian interest groups have engaged with the EU AI Act. This approach allows for an exploration of both quantitative data and qualitative insights, which offers a more detailed understanding of the strategies Croatian interest groups have used. The document analysis draws from a variety of sources, including policy papers, legislative texts, various reports, Eurostat, data from the EU Transparency Register, and the Have Your Say Portal (e-public consultations site for the EU legislative proposals). Alongside this, expert interviews provide valuable, in-depth perspectives on the motivations and challenges these groups faced. By integrating these methods, the research aims to present a well-rounded view of Croatian interest groups' involvement in the complex policy landscape of the EU AI Act.

A particular emphasis of this research is on Croatian Artificial Intelligence Association (CroAI) and its partnership with the lobbying firm EuroNavigator, given that the two actors exhibited a comprehensive engagement with the Act since its early draft stage. In general, Croatia presents a unique case study due to its status as a smaller EU and still the newest member state, with expectedly limited influence compared to larger member states. Despite these limitations, Croatian interest groups like CroAI have demonstrated a proactive approach in engaging with EU policymakers. CroAI's formation and activities represent a curious case in the broader context of digital policy and AI-related advocacy in Croatia. As a relatively new association, CroAI has positioned itself as a key player in the Croatian tech scene and has been advocating for the interests of smaller tech firms, startups and other SMEs (small and medium-sized enterprises). The organisation's ability to influence EU policy, despite Croatia's modest size and resources, raises questions about the role of smaller member states in the EU's complex policymaking process. In that sense, this thesis also hopes to explore how Croatia's status as a smaller EU member state affects its interest groups' engagement in EU policymaking, while holding a particular focus on the strategies employed by Croatian interest groups and the perceived effectiveness of these efforts.

This thesis is organised as follows. The second chapter provides a literature review which explores key concepts and theories regarding EU policymaking, the influence of interest groups, and the specific context of interest groups in Croatia. The theoretical framework and methodology section then details the conceptual underpinnings and research methods used to analyse the data. This is followed by an in-depth examination of Croatian interest groups'

engagement, featuring document-level analysis and a focused (micro) case study on the Croatian Artificial Intelligence Association. Insights from expert interviews are also presented to provide a richer understanding of the topic. The analysis and discussion chapter connects these findings to broader theoretical debates and practical implications for Croatia's role in EU policymaking. The thesis concludes by summarising the key findings, acknowledging its limitations, and suggesting avenues for future research.

## **2. Literature Review**

### **2.1 EU policymaking and interest group lobbying**

Lobbying is a significant aspect of the EU's policymaking process. This is hardly surprising given the diversity of the EU's economic and political landscape. The EU simply is the place to be when it comes to lobbying, being surpassed in its importance only by Washington (Mahoney, 2008). The EU's decision-making process is deeply intertwined with both national and supranational levels, which allows lobbyists to influence legislation through multiple channels. The growing complexity of EU legislation has attracted an unprecedented number of lobbyists, sometimes even raising concerns about democratic accountability of the decisions made (Bernhagen & Hüttemann, 2023: 315). This complexity is also reflected in the variety of theoretical approaches used to analyse EU lobbying, from Olson's collective action theory to exchange perspective frameworks, each highlighting different facets of how interest groups mobilize and interact with policymakers (Bernhagen & Hüttemann, 2023: 316).

Olson's collective action theory expands the understanding of interest group dynamics (in the EU) as it tackles challenges in group formation and the free-rider problem (Olson, 1971). Olson's argument suggests that small, privileged groups, often representing (narrower) business interests, are more successful in overcoming the free-rider problem and exerting influence in the political sphere. In contrast, larger groups, such as those representing broader public interests, struggle to organize and are often underrepresented in the lobbying process. This inherent asymmetry in organizing lobbying activities, where business interests are more effectively organized compared to citizens, highlights the disparities in political influence and the potential biases in policy outcomes – which is particularly applicable in the EU legislative landscape as the collective action problems are most likely to emerge there (Olson, 1971; Polk, 2023: 16-17; de Bruycker et al., 2018).

The exchange perspective on lobbying provides a lens through which to understand the interactions between lobbyists and policymakers. Namely, “it is a mistake to regard business lobbying as a unidirectional activity of private actors vis-à-vis the EU institutions. It needs to be recognized that the EU institutions are eager to interact because they need close contacts with the private sector in order to fulfill their institutional role” (Bouwen, 2004: 339). In other words, “private and public actors [in the EU] become interdependent because they need resources from each other” (Bouwen, 2004: 339). Bouwen calls these “access goods” and divides them into “expert knowledge, information about the European Encompassing Interest

and information about the Domestic Encompassing Interest” (Bouwen, 2004: 340). This perspective views information as a key currency in the lobbying process, where interest groups offer valuable insights and data to policymakers in exchange for access and influence. The EU's complex policymaking process, which often involves highly technical issues, makes this exchange particularly significant, as policymakers rely on the expertise provided by lobbyists to make informed decisions. This theoretical approach will likely be important when considering the AI Act and the extremely technical area it regulates. In other words, it will likely be relevant in terms of expertise and information asymmetry that characterize the legislative landscape of AI regulation in the EU.

The legal and institutional foundations of lobbying in the EU were designed to encourage transparency and regular dialogue with civil society and representative associations. However, Bernhagen and Hüttemann point out that the boundaries between civil society and lobbying are often blurred, particularly in the EU's normative discourse. Despite efforts to increase transparency, there is still “widespread public perception of undue influence by lobbyists on EU decision-making processes” (Bernhagen and Hüttemann, 2023: 317). The EU has responded with a series of regulatory measures, including the Transparency Register, which, as of 2021, provides detailed and insightful financial as well as demographic information on interest groups lobbying any European legislative institution in the EU.

The interaction between national and supranational levels in the EU's multi-level governance system complicates the lobbying landscape further. In other words, lobbying can occur through national governments or directly at the EU level, i.e. at different “policy venues”, depending on the specific policy issue and the lobbyists' strategic considerations (Baumgartner & Jones, 1991). This multi-level system allows interest groups to engage in “venue shopping”, where they choose the most favourable institutional settings for their lobbying activities (Baumgartner & Jones, 2009). Adding to the complexity, lobby groups need to consider time as an important element in their activities. Namely, lobbying the European Commission during the early stages of policy formulation – particularly during the Green paper phase or the White paper phase – is often more effective than lobbying later in the legislative process (Bouwen, 2009).<sup>2</sup> The complexity of the EU's decision-making processes, combined with the strategic options

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<sup>2</sup> Green Papers discuss whether legislation is necessary at all, while White Papers develop concrete policy options and provide opportunities for lobbying (Bernhagen and Hüttemann, 2023: 321)

available to interest groups, underscores the sophisticated nature of lobbying within the EU and the critical role it plays in shaping legislation.

Importantly, it is the European Commission that quantitatively provides most opportunities for lobbying. Not only due to the ordinary legislative procedure, during which the Commission is the sole proposer of legislative acts, but also due to all the delegated and implementing acts that are created and decided under its watchful eye. Policy proposals by the European Commission are uploaded on the Have Your Say Portal and are usually open for public consultations, feedback and contributions from EU interest groups and citizens at various proposal stages – from the impact assessment phase where the policy proposal is at its inception stage, continued by public consultations phase where the policy proposal is being developed and is in need of substantive feedback (able to be given via questionnaires and position papers), to commission adoption phase asking for final contributions and comments. While the Have Your Say Portal also provides detailed and insightful information about interest groups' engagement with Commission proposals, it also makes the European Commission a lobbyist's favourite target. In other words, the European Commission is “in a pivotal position” when it comes to lobbying (effectiveness) in the EU (Bernhagen and Hüttemann, 2023: 321). On other hand, the Council of the European Union is the most difficult target for lobbying in the EU, while the European Parliament offers diverse channels of influence, most promising of which are the rapporteurs and committee chairs (Veen, 2011; Bernhagen and Hüttemann, 2023: 323-324).

The role of lobbying in shaping policy has been extensively discussed in the political economy literature, highlighting the influence of organized interest groups, including corporations, unions, and trade associations, in the policymaking process. In particular, the traditional focus of researchers has been the so-called “special interest groups” or SIGs, “organized interest groups usually motivated by ideological or financial gains” (Ellis & Groll, 2023: 221). SIGs have recently been under attention because of the interest in how they employ lobbyists, who “exploit personal relationships with policymakers to benefit their interest groups” or, in nobler terms, act as intermediaries between interest groups and policymakers (Ellis & Groll, 2023: 222). Out of the two professional types of lobbyists, in-house lobbyists and commercial lobbyists, the latter of the two requires further attention. Why? Because the emergence of commercial lobbying firms, which operate for profit and represent multiple clients across various issues, has added complexity to the already complicated EU lobbying landscape. These

firms often act as “hired guns”, providing specialized lobbying services that go beyond the capabilities of in-house lobbyists employed directly by interest groups (Ellis & Groll, 2023: 222, 236). The distinction between in-house and commercial lobbyists is crucial for understanding the dynamics of lobbying in EU policymaking, as the commercial lobbyist’s ability to represent multiple interests across diverse issues can lead to greater influence and access to policymakers (Ellis & Groll, 2023: 222). One other relevant concept when theorizing about lobbying in the EU is the concept of “the revolving door”, a term commonly used to describe how individuals transition from the private to the public sector, and vice versa (Luechinger and Moser, 2023: 168; Ellis & Groll, 2023: 226).

In terms of lobbying strategies, it is commonly understood that lobbyists can utilize *inside* and *outside* lobbying strategies. Inside lobbying strategies consider lobbying as a direct exchange between interest groups and policymakers (de Bruycker & Beyers, 2018; de Bruycker et al., 2018). Also commonly referred to as direct lobbying strategies, as advocacy activities are aimed directly at policymakers, the underlying logic of inside lobbying is gaining access to policymakers (Hansen, 1991; Bouwen, 2004; de Bruycker & Beyers, 2018). These political activities typically do not attract significant public attention and are not usually visible to the general public or individual citizens. Inside lobbying can manifest in various ways, including face-to-face meetings, phone calls, email exchanges, or participation in expert committees. Although each of these methods differs in approach, they all involve direct communication with policymakers through channels that generally lack widespread public exposure. Scholars of interest groups generally view inside lobbying from an (already mentioned) information exchange perspective (Bouwen, 2002, 2004; Klüver, 2013; de Bruycker & Beyers, 2018: 3).

On the other hand, outside lobbying strategies encompass indirect ways of influencing political processes, notably media campaigns, protests and others (de Bruycker & Beyers, 2018; de Bruycker et al., 2018). In particular, outside lobbying strategies encompass activities such as press releases, press conferences, engaging with journalists, public campaigns, social media advertisements, or protest events. These tactics are characterized by their indirect approach to influencing policymakers, focusing instead on raising awareness among a broader audience through various forms of public media. The primary goal is to signal strong public support and draw a wider range of stakeholders into the policy debate, thereby increasing pressure on policymakers to act in accordance with public sentiment. Failing to respond to such pressure

can carry risks for policymakers, including potential damage to their reputation or electoral prospects (de Bruycker & Beyers, 2018).

Non-business groups are thought to use outside lobbying more than inside lobbying, and for business groups it is the other way around as they tend to use more inside lobbying strategies and tactics (Dur & Mateo, 2016). As to why that is the case, there are three reasons. First, it is generally thought that business interest groups usually have a more privileged access to policymakers, especially at elite level, and therefore use inside lobbying strategies more as it is easier for them than for non-business interest groups (Dur & Mateo, 2016). Second, non-business interests are usually more aligned with public opinion and tend to enjoy more public support than that is the case with business interests (Berry & Wilcox, 2018). Third, interest groups' ability to provide valuable and insightful information about potential consequences of policy proposals is a prerequisite for accessing policymakers, notably because the information provided is usually quite technical and therefore a useful resource for European institutions and particularly the European Commission (Hansen, 1991; Bernhagen and Hüttemann, 2023: 329)

As far as effectiveness of inside and outside lobbying strategies is concerned, research by de Bruycker and Beyers (2018) indicates that the effectiveness of outside lobbying is influenced by additional tactics employed by interest organisations and the specific issue context in which they operate. For instance, the formation of coalitions – particularly those involving a diverse or heterogeneous set of interest groups – can enhance the success of outside lobbying efforts, especially when combined with such tactics (relative to inside lobbying). Moreover, the context in which lobbying takes place also plays a critical role. Outside lobbying tends to be more successful when it is used to defend positions that already have broad public approval. Conversely, when advocating for positions that lack widespread public support in media debates, lobbyists may achieve better outcomes by focusing on inside lobbying while reducing their reliance on outside lobbying (de Bruycker and Beyers, 2018: 16).

These insights are crucial for understanding the broader landscape of EU interest representation. Although EU policymaking is not solely a technocratic process, EU policymakers do show some responsiveness to popular demands and lobbying strategies that are prominently featured in the media. This suggests that the EU political system is more likely to amplify policy perspectives that receive public support. However, it is important to distinguish between media endorsement and actual citizen support, as media coverage does not necessarily reflect public opinion (NB: it is more likely it represents close collaborations



between interest groups and media actors). Nevertheless, understanding how policies are debated publicly and the extent to which lobbyists can leverage media approval of their policy views is vital (de Bruycker and Beyers, 2018: 16).

When engaging in EU public policy lobbying, interest groups frequently collaborate with other entities, including those with distinct specializations and networks. Typically, these alliances are formed strategically among like-minded actors, aiming to enhance their political influence by encompassing a wide range of functional and geographical perspectives (Klüver, 2013). These coalitions are intentional partnerships between organized interests that share a common stance on the issue at hand, involving the strategic exchange of resources, information, and coordinated lobbying efforts (Hula, 1999). Such collaboration allows advocacy organizations to pool resources and distribute costs while presenting a united front to policymakers, thereby signalling broad support for their policy demands. This unified approach can provide a significant advantage in political conflicts with opposing interests (Junk & Rasmussen, 2019). However, participating in an alliance also comes with potential drawbacks, such as increased coordination costs and the risk of damaging an interest group's credibility or relationships with its members and supporters (Hula, 1999). Consequently, some groups may choose to lobby independently (Bernhagen and Hüttemann, 2023: 330).

Alliances are typically pursued to increase the likelihood of influence, suggesting they should positively impact the political influence of the involved parties. A coalition representing a diverse array of organized interests can draw on a broad spectrum of members and supporters, mobilizing various political resources and expertise and allowing them to engage more policymakers. Importantly, heterogeneous alliances, which include both business and non-business groups, are increasingly common in policy areas that attract significant public interest and media attention (Berkhout et al., 2018; de Bruycker & Beyers, 2018; Bernhagen and Hüttemann, 2023: 330-331). This finding will likely be applicable to the EU AI act, as it garnered a substantial public and media interest.

Finally, it is important to mention the studies focused on the relative success of different interest groups, particularly whether business interests wield more influence in EU policymaking than other types of groups. Recent findings by Dür and others (2019) suggest that business groups have experienced declining success in the EU, particularly as they increasingly find themselves defending the regulatory status quo against new regulations. Business lobbies have therefore generally been less successful than other groups in the

contemporary EU. Also, it is worth noting that both the European Parliament and the European Commission have recently shown a closer alignment with the positions of non-business groups rather than business interests. Even the Council of the EU, traditionally seen as an ally of business, no longer reliably supports business interests (Dür et al., 2019). Consequently, the overall political agenda and legislative direction of the EU today are not particularly favorable to business interests. The increasing politicization and public scrutiny of certain EU policies are further limiting the influence of business groups (Dür & Mateo, 2014; Bernhagen and Hüttemann, 2023: 331).

## **2.2 EU policy and Croatian interest groups**

In "Unlocking Influence: Access and Lobbying Strategies of Croatian Interest Groups in the EU Policymaking", Igor Vidačak explores the strategies used by Croatian interest groups in the context of policymaking in the EU, particularly after Croatia's accession to the EU. Vidačak examines the dual or multi-level strategies employed by these groups and analyses their participation in both domestic and EU-level lobbying. Furthermore, the article discusses the broader context of Europeanization and its impact on national interest groups. It is discussed how EU integration has altered the policymaking processes in member states, particularly in Central and Eastern Europe. The increasing pressures on national interest groups to engage in both domestic and EU-level lobbying are highlighted, with various referenced studies suggesting two main approaches: those that build on national access and those that compensate for a lack of it by engaging directly at the EU level. Although the literature on interest groups lobbying and policymaking in the EU is robust and growing, Vidačak rightly points out the lack of empirical research in newer EU member states like Croatia and the challenges these states face due to their post-socialist legacies and limited resources (Vidačak, 2024: 38-43).

Particularly relevant to this research are Vidačak's findings. Namely, despite ten years of EU membership, the engagement of Croatian interest groups at the EU level remains low, with minimal use of the various access points offered by the EU's multi-level governance system. Data from the EU Transparency Register, on which this thesis will partly rely on, shows that few Croatian groups have developed effective EU-level lobbying strategies. In part, due to limited human and financial resources. For instance, the numbers indicating Croatian interest groups' meetings with EU policymakers (accessible via the Transparency Register) or involvement in the EU public policy consultations on the Have Your Say Portal are still comparatively low (Vidačak, 2024: 52).

At the national level, the situation is even more difficult, particularly due to the Croatian government's non-transparent and inadequate management of EU affairs and inadequate use of parliamentary oversight mechanisms (Vidačak, 2024: 52). Namely, Croatian ministries refrain from organizing consultations on draft national positions regarding EU legislative acts under consideration in the Council.<sup>3</sup> Despite the availability of the central government's well-functioning e-consultation portal, it has never been utilized for this purpose. The government justifies this lack of inclusiveness in EU affairs by explaining, after each government session, that national positions discussed behind closed doors are still subject to negotiation with other member states. Consequently, these positions are considered too fluid and tentative for broader public consultation at this stage (Vidačak, 2024: 49). Additionally, based on the published list of meetings with the Head or Deputy Head of Permanent Representation of Croatia to the EU, it is noticeable that “only business interest groups use this specific national channel of direct influence on Croatian positions in the Council” (Vidačak, 2024: 52).

In the absence of formal consultation mechanisms between the Croatian government and interest groups on draft national positions regarding EU legislation, one would expect the Croatian Parliament to stand as the primary national channel of influence. Unfortunately, that is not the case. As Vidačak explains, according to the Law on Cooperation between Croatian Parliament and Government in managing EU affairs, the Parliament's Committee for European Affairs is tasked with reviewing the government's national positions within the Council. The committee also has the authority to request impact assessments on EU legislation as part of the Parliament's Annual Work Programme. Sadly, since Croatia's EU accession, this provision has never been invoked, meaning that potential impacts – whether financial, economic, social, or environmental – of proposed EU legislation on Croatia have not been critically assessed by Parliament (Vidačak, 2024: 50).<sup>4</sup> This practice, Vidačak concludes, reflects the continuity of

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<sup>3</sup> Vidačak adds that only in a few recent instances, where there was significant public and media attention combined with strong pressure from trade unions and renewed political commitments to social dialogue by EU leaders, has there been a shift in the approach to communication on EU acts in the areas of employment and social policy between the responsible ministry and social partners. On the other hand, despite considerable investment from EU funds during the pre-accession phase to build the capacities of civil society organizations for effective monitoring of EU-related reforms, these capacities have not been evident in the post-accession period, leaving domestic accountability mechanisms still weak (Vidačak, 2023: 361).

<sup>4</sup> The practice of selecting public representatives to serve on parliamentary committees, which has been in place since 2008 following a civil society initiative, is seen as a significant achievement of Croatia's EU accession process (Vidačak & Škrabalo, 2014: 176). These representatives, who receive modest

elitist approaches established during Croatia's EU pre-accession process, indicating a “path dependency” that has persisted post-accession. In other words, this process has legitimized the misuse of urgent procedures for all EU-related legislative acts. The “hurry-up atmosphere” surrounding EU acts discussed in the Council has persisted as the prevailing practice among responsible government bodies, perpetuating the “paradox of weakness” of the government in EU-level decision-making and its inability to adopt more inclusive styles of managing EU affairs in Croatia (Vidačak, 2023: 361-362). Although, a government representative interviewed by Vidačak offered an additional perspective, suggesting that the lack of human resources and an unwillingness to take on additional work are key factors preventing ministries from proactively publishing positions and organizing structured dialogues with stakeholders in a timely manner (Vidačak, 2024: 49-50).

In conclusion, everything mentioned above has led to a marginalization of both Croatian parliament and Croatian civil society in the EU policymaking process. This finding in particular contests the theoretical assumptions of liberal intergovernmentalism, laid out by Moravcsik (1993), and suggests that economic and societal interests are not really considered (influential) during national preference formulation in some post-communist EU member states (Rybář, 2011; Vidačak, 2023; Vidačak, 2024: 41). In other words, this finding is particularly applicable to Croatia as the lack of open communication and consultation mechanisms on EU affairs in Croatia further alienate citizens from EU institutions and increase the long-term costs of EU membership (Vidačak, 2024: 50).

### **2.3 The AI Act and the EU interest groups' engagement**

While artificial intelligence has already transformed various industries and the ways we work, the European Union is asserting itself as a global standard-setter with the AI Act at the forefront of its digital strategy. Its ambitious legislative effort is not just about regulating AI within

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compensation, have direct access to discussions on national positions related to EU legislation within their respective committees. Moreover, Vidačak explains, other interested parties can attend committee sessions upon request, although this process is subject to prior review. Despite these provisions, challenges remain in effectively using parliamentary committees to influence national positions. One major issue, highlighted in an interview conducted by Vidačak with an external member of the European Affairs Committee, is the selection process for these representatives, which often favors those close to the ruling party. Additionally, preparing amendments to government positions demands significant expertise from interest group representatives, while government representatives tend to present their positions as finalized, leaving little room for modification (Vidačak, 2024: 51).

Europe's borders; it's about shaping the global conversation around AI ethics, safety, and innovation. The AI Act could also lead to the EU's regulations becoming a benchmark (or at least an inspiration) for AI standards worldwide, resulting in a de jure Brussels Effect, while the product changes resulting from AI regulation in the EU would constitute a de facto Brussels Effect (Siegmann & Anderljung, 2022: 3-4). This potential for global impact makes it imperative that the AI Act is meticulously designed to foster innovation while also safeguarding human rights and setting a positive example for international AI governance.

The journey toward the AI Act began with the European Commission's Communication on Artificial Intelligence for Europe in April 2018, marking the start of a comprehensive strategy to regulate AI. This was followed by the release of the White Paper on AI in February 2020, which laid the foundation for public consultations on a European approach to AI. The proposal for a regulation laying down harmonised rules on AI was introduced in April 2021, alongside the updated coordinated plan on AI. Throughout 2021 and 2022, significant milestones included the Council's general approach on the AI Act in December 2022 and the European Parliament's negotiating position in June 2023. A political agreement on the Act was reached in December 2023, with the Act entering into force on 1 August 2024, following the establishment of the European AI Office in February 2024 (European Commission, 2024f).

The EU AI Act is a component of the EU's broader strategy to regulate emerging technologies and establish standards for the development, deployment, and use of AI systems across the Union. This act complements the Digital Services Act (DSA) and the Digital Markets Act (DMA) by ensuring that AI-powered services provided by digital platforms are both reliable and ethically sound, thereby reinforcing user trust and promoting fairness in the market. The European Commission's coordinated enforcement of these regulations aims to mitigate legal fragmentation across member states and facilitate a harmonized digital market that supports innovation but upholds fundamental rights and ethical standards. In particular, it can be said that the DSA emphasizes user protection and rights, that the DMA focuses on preserving competitive markets, and that the AI Act complements the two by setting standards for the ethical and safe use of artificial intelligence. Collectively, the three pieces of legislation form an integrated regulatory architecture designed to foster a secure, equitable, and innovative digital environment in the European Union (European Commission, 2024c).

The AI Act itself is the first comprehensive legal framework aimed at regulating artificial intelligence with a focus on mitigating risks to health, safety, and fundamental rights. The regulation categorizes AI systems into various risk levels: unacceptable, high, specific transparency risk, and minimal risk. Unacceptable AI systems, which violate EU values, are banned, while high-risk systems must undergo strict assessments and continuous monitoring. The Act also mandates transparency in AI applications, ensuring users know when they interact with AI, particularly in cases involving deep fakes or chatbots. Applicable to both public and private sectors, the AI Act aims to create a harmonized internal market for AI across the EU while balancing innovation with regulation (European Commission, 2024a).

While the passage of the Act marks an important moment in the history of EU regulation, the process leading to its passage has not been without significant challenges. Particularly from the tech industry, which has exerted considerable influence in trying to shape this legislation. As Corporate Europe Observatory has detailed, Big Tech has leveraged its extensive resources to undermine efforts to regulate AI, particularly foundation models like ChatGPT.<sup>5</sup> The disproportionate (and often top-level) access enjoyed by these companies during the negotiation process has raised concerns about whether the AI Act can effectively address the risks posed by AI technologies or if it has been compromised to favor industry interests, leaving the act “with no teeth left” (CorporateEurope, [2023a](#)). This scenario underscores the broader issue of corporate influence in EU policy making, where the interests of powerful industries can overshadow interests of smaller players and, more importantly, public welfare concerns. The lobbying efforts by Big Tech, which included high-level meetings with European Commissioners and sustained pressure during the trilogue procedure, have diluted some of the stricter provisions originally proposed in the AI Act.<sup>6</sup> This has led to skepticism about whether the final legislation will be robust enough to mitigate the risks associated with advanced AI systems, particularly in safeguarding against biases and ensuring transparency and accountability in AI applications (CorporateEurope, [2023b](#)).

As we transition from discussing the legislative framework of the AI Act to the specific engagement of interest groups in its development, it becomes crucial to understand how these

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<sup>5</sup> As reported by Corporate Europe Observatory, the Big Tech sector alone “spends 113 million euros per year on lobbying in Brussels” (CorporateEurope, [2023c](#))

<sup>6</sup> Big Tech chief executives from Google, OpenAI and Microsoft have all “shuttled to Europe to meet policy-makers at the highest level, including commission members and heads of state. Google’s Sundar Pichai even managed to have meetings with three commissioners in just one day” (CorporateEurope, [2023b](#)).

dynamics have shaped the final outcome. The engagement of interest groups, especially those from smaller EU countries, must be examined within this context of unequal access and influence. This raises important questions about the effectiveness of advocacy efforts from less resourceful entities situated in small EU countries such as Croatia. In other words, it highlights the need for research into how these groups can navigate the complex lobbying landscape, leverage their unique positioning, and effectively influence EU policy despite the dominance of larger, more powerful (read: wealthier) actors. Exploring strategies that allow smaller interest groups to amplify their voices and achieve meaningful impact in such an imbalanced environment is essential for ensuring a more equitable and inclusive policymaking process at the European level.

Tallberg and others (2024) provide a rather unsurprising insight into the dynamics of stakeholder engagement in the public consultations on the EU AI Act (European Commission, 2020). With nearly 40% (39.8%) of the submissions coming from business entities, it is evident that the commercial sector is highly invested in shaping the regulatory landscape for AI. This disproportionate representation of business actors compared to other non-state actors, such as NGOs (21.6%) and academic institutions (16.8%), warrants closer examination (Tallberg et al., 2024: 226). One possible explanation for this substantial participation by business entities is the direct impact that the AI Act will have on their operations, profitability, and competitive positioning. AI technologies are rapidly becoming integral to various business models, driving efficiency, innovation, and market differentiation. As such, businesses are motivated to influence regulations that could either enhance or inhibit their ability to leverage AI for competitive advantage. The stakes are particularly high in the tech sector, which constitutes 25.9% of the business submissions, which underscores the sector's dependence on favorable regulatory outcomes (Tallberg et al., 2024: 226).

The high level of business participation can also be theorized as a function of resource availability and organizational capacity (Eising, 2007). It is therefore not surprising that more than half of the organisations listed in the Transparency register are business actors (Berkhout et al., 2018). Businesses, especially large corporations and industry associations, typically possess the financial and human resources necessary to engage extensively in policy consultations. Within their organizations, they often have dedicated legal and regulatory affairs departments that monitor and respond to legislative developments and ensure that their interests are well-represented. On top of that, most of them rely heavily on professional lobbyists and

consultancies, for which they pay hefty sums according to data from the Transparency Register. This level of organizational capacity is generally less pronounced among NGOs and academic institutions, which may lack the same level of resources to engage in lengthy and complex consultation processes, thereby contributing to their relatively lower representation. As a result, the declaratory importance given by EU institutions to civil society groups should be taken with a grain of salt, at least if one wants to have a fuller picture view of the interest representation landscape in the EU (Eising, 2007: 357).

While it is true that the inclusion of business perspectives is crucial for crafting regulations that are pragmatic and implementable, there is a risk that over-representation could skew the regulatory framework in favor of commercial interests. Potentially, this will be at the expense of public protection. Tallberg highlights this tension and notes that business actors tend to advocate for less stringent regulations to maintain flexibility and competitiveness, whereas non-business actors, such as NGOs and labor unions, push for stronger safeguards to protect societal interests (Tallberg et al., 2024: 223).<sup>7</sup>

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<sup>7</sup> The responses from the public consultations underscore the tension between promoting innovation and safeguarding public interests, a central theme in EU AI Act debates. For instance, Thales SA, a prominent French aerospace company, argued that the consultation process overly focused on concerns at the expense of recognizing the positive impacts of AI. In contrast, NGOs like PICUM highlighted the potential risks AI poses to fundamental rights “in the areas of policing and immigration control” and advocated for stringent oversight to prevent misuse (Tallberg et al., 2024: 228).



### **3. Theoretical Framework and Methodology**

#### **3.1 Theoretical and analytical framework**

The framework for analyzing the engagement of Croatian interest groups with the EU AI Act will rely on the exchange perspective on lobbying within the European Union. As Bouwen (2004) suggests, lobbying in the EU is not a one-way interaction where private actors simply exert influence on public institutions. Instead, it is an interdependent relationship where both parties exchange valuable resources – namely, information and expertise – for access and influence. This exchange is especially critical in areas like artificial intelligence, where the complexity of the subject matter creates a significant information asymmetry between policymakers and interest groups.

Given this context, the European Commission will likely be a primary target for Croatian interest groups' lobbying efforts, expectedly due the Commission's central role in initiating and drafting AI legislation. The use of platforms such as the Have Your Say Portal by Croatian interest groups is expected. The expectation is that these groups will seek to leverage their technical expertise and provide valuable input to gain access to decision-makers at the Commission. This strategy aligns with the broader theoretical framework that positions the Commission as the most influential venue for interest groups within the EU's multi-level governance system.

The analytical framework for understanding Croatian interest groups' engagement with the AI Act will also consider the dichotomy between inside and outside lobbying strategies. For Croatian interest groups, the use of both inside and outside lobbying strategies is anticipated. Inside lobbying is expected to be particularly effective given the technical complexity of the AI Act, which likely necessitates close interactions with policymakers to ensure that their concerns and expertise are adequately considered. However, outside lobbying should not be discounted, especially in an era where public opinion and media coverage can significantly influence the legislative process (de Bruycker & Beyers, 2018). The potential for outside lobbying to amplify the voices of smaller or less resource-rich interest groups by garnering public support makes it a valuable tool in the Croatian context.

Moreover, the dynamics of coalition-building may prove to be crucial in this analysis. Given the relatively small size and limited resources of many Croatian interest groups, forming alliances with other like-minded organisations could be a strategic way to enhance their

influence in the EU policy-making process (Bernhagen & Hüttemann, 2023). Such coalitions would allow these groups to pool their resources, share the costs of lobbying, and present a united front to EU policymakers. Therefore, coalition-building is expected to be a prominent strategy among Croatian interest groups as they seek to navigate the complexities of the EU legislative process, particularly in relation to the AI Act.

The framework for analysing the influence of Croatian interest groups on the EU AI Act must also consider the broader debate on the relative success of different types of interest groups within the EU. Historically, business interests have been seen as particularly successful in influencing EU policymaking, largely due to their resources and access to policymakers. However, as recent studies suggested, this influence is waning as the EU becomes more politicized and public scrutiny increases (Dür et al., 2019; Dür & Mateo, 2014). The increasing alignment of the European Parliament and Commission with non-business groups' positions suggests that the legislative environment may be less favorable to business interests than in the past. For Croatian interest groups, this could mean that their lobbying efforts might face significant challenges, particularly if they align closely with broader business interests. The framework, therefore, anticipates that while Croatian business groups will engage actively with the AI Act, their influence may be limited by their ability to present the relevance of their interests to the society at large.

The framework must also account for the barriers Croatian interest groups face at the national level. The Croatian government's non-transparent management of EU affairs and its inadequate use of parliamentary oversight mechanisms severely limit the opportunities for interest groups to influence national positions on EU legislation (Vidačak, 2024). Given this context, the expectation is that Croatian interest groups will likely make minimal use of national channels, particularly at the parliament level, to exert influence on the AI Act. This lack of engagement at the national level suggests that these groups may either bypass national mechanisms altogether or attempt to engage directly with EU institutions, where their efforts are more likely to be recognized.

The final component of the framework focuses on the specific engagement of interest groups with the AI Act. Previous studies have shown that business entities dominated the public consultation process for the AI Act, with significant implications for the final legislation (Tallberg et al., 2024). A similar situation is expected to happen with the Croatian interest groups, particularly those representing business interests, who are likely to employ similar

strategies, including coalition-building and both inside and outside lobbying tactics, to influence the AI Act. The framework anticipates that Croatian interest groups will align their efforts with those of larger, more influential EU entities, aiming to amplify their impact through collective action. However, the effectiveness of these efforts may be constrained by the same challenges that affect their overall engagement at both the national and EU levels.

### **3.2 Methodology**

This research uses a mixed-methods approach by integrating document analysis with qualitative expert interviews to examine the engagement of Croatian interest groups with the EU AI Act. The combination of these methods allows for an exploration of both quantitative and qualitative data and provides a well-rounded understanding of the research questions. A mixed-methods approach is particularly suitable for this research because, while extensive data is available online through sources like the Transparency Register and the Have Your Say Portal, it is crucial to complement this with qualitative data to gain a deeper understanding of the strategies employed by Croatian interest groups. The integration of qualitative insights from expert interviews with quantitative data from document analysis will provide a view of how these groups interacted with the EU AI Act's legislative procedure, why they chose specific strategies, and what challenges they encountered.<sup>8</sup> By combining these methods, the research will offer a nuanced analysis of the engagement of Croatian interest groups within this complex policy environment.

The document analysis will encompass a broad range of sources, including policy papers, position statements, legislative texts, and data from the EU Transparency Register and the Have Your Say portal. Additionally, position papers submitted by interest groups, data on meetings between Croatian interest groups and the Permanent Representation of Croatia to the EU, and relevant Eurostat statistics will be included. Media articles, publicly available interviews,

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<sup>8</sup> Qualitative expert interviews play a crucial role in social sciences, particularly in assessing causal mechanisms and generating descriptive insights into the “what” and “how” of political processes (Fu and Simmons, 2021; cit. prema von Soest, 2023: 284). Conducted in a structured manner, these interviews allow researchers to examine the actual behaviour of actors within a decisional context and to uncover the reasons behind specific outcomes. The findings from these interviews contribute to a deeper analysis of significant political science questions and bridging the macro and micro levels of analysis (von Soest, 2023: 284). In the context of this research, expert interviews will be used to provide invaluable firsthand perspectives on how Croatian interest groups engaged with the legislative process of the EU AI Act and offer insights that go beyond what is available through document analysis alone.

podcasts, and panel discussions will also be analysed to capture the public discourse and narratives surrounding the EU AI Act.

The data from the Transparency Register and the Have Your Say portal will provide quantitative insights into the extent and nature of Croatian engagement in the AI Act's legislative process. Position papers and data on meetings will offer a detailed view of the strategies and positions advocated by these groups. Meanwhile, Eurostat statistics will help contextualise the economic and social factors influencing Croatian interest groups' actions. Media analysis will enrich this understanding by revealing how these groups' contributions were perceived and discussed in public forums, offering a nuanced perspective on their influence and effectiveness. Together, these documents will provide an understanding of the roles, challenges, and impacts of Croatian interest groups within the EU AI regulatory landscape.

### **Expert interviews: selection, format and list of questions**

The selection of interviewees for this research was made to ensure that those most relevant to the Croatian interest groups' involvement in the EU AI Act legislative process were included. The interviewees were chosen based on their roles within Croatian organisations most likely to have engaged with the EU AI Act's legislative process. This selection was informed by data from the EU Transparency Register and the European Commission's Have Your Say Portal, which provided valuable insights into which organisations were actively involved in AI Act-related advocacy at the EU level.

Key organisations, initially targeted for interviews, included DOK-ING Ltd., a leader in producing high-quality robotic systems with a strong commitment to AI and digital technologies, and Infobip Ltd., a global communication technology company. CroAI, whose founder Mislav Malenica is also a founder of an AI startup Mindsmiths, was a crucial target due to its engagement with the European Commission's White Paper on Artificial Intelligence.<sup>9</sup> Gong, an NGO known for its work in digital democracy and media responsibility, was included as a target for its intersectional role in AI regulation and human rights. Lastly, EuroNavigator,

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<sup>9</sup> It is important to note here that Mindsmiths, as an organisation registered in the Transparency Register, also engaged with the AI act via the Have Your Say Portal. Yet, their contribution was CroAI's policy position. This is not to say that CroAI represented the interests of a single company. Rather, this seems to have been a result of changes and updates made in the Transparency Register on the side of CroAI.

a public affairs firm, was selected because of its involvement in advancing Croatian interests within the EU, particularly through its partnership with CroAI but also with companies like Infobip and DOK-ING Ltd on other legislative acts. In addition to these organisations, Rimac Technology and Project 3 Mobility (now Verne) were considered because of their indirect connection with AI regulation, especially in sectors like automotive and industrial technology. Even though these entities did not explicitly target AI regulation, based on their Transparency Register profiles, the expectation was that their integration with AI development made them noteworthy players in the AI landscape, particularly in relation to the EU AI Act's provisions on high-risk AI systems.

Although the plan was to conduct interviews with at least five experts who were directly involved or potentially had significant knowledge of how Croatian entities engaged with the AI Act, due to various logistical challenges – including scheduling conflicts, time constraints and interviewees' willingness to be interviewed – only two interviews were successfully conducted. However, it became evident during the research that CroAI, through its partnership with EuroNavigator, was the only organisation that comprehensively engaged with the AI Act in Croatia and the EU. Many other potential actors did not engage as extensively or sufficiently early in the process, as they did not initially see AI policy as a priority, according to one interviewee from EuroNavigator (Interview 2, 2024).

The expert interviews have been conducted using a semi-structured format, allowing for flexibility in the conversation while ensuring that key topics are thoroughly explored. An interview guide has been developed to steer the discussions, focusing on the engagement strategies, contributions, and perceptions of effectiveness among Croatian interest groups involved in the EU AI Act legislative process. The semi-structured approach allowed interviewees to provide detailed, nuanced insights while ensuring consistency across interviews. The interviews were conducted in Croatian and were translated by the author for the purposes of this thesis.

The key questions included:

**Engagement strategies**

1. What strategies (and through which venues) did your organisation employ to influence the EU AI Act?

2. How did you decide between inside and outside lobbying approaches in your efforts to influence the legislation?
3. Can you discuss any coalition-building efforts? Were these coalitions effective in enhancing your influence on the EU AI Act?
4. How did the timing of your engagement (early vs. late in the legislative process) impact your strategy?

### **Contributions**

5. What specific contributions did your organisation make during the AI Act's legislative process?
6. How did you ensure your input was considered by policymakers?
7. Were there any particular challenges in having your contributions recognized at the EU level?
8. How did you leverage technical expertise to influence the legislative process?

### **Perceptions of effectiveness**

9. How effective do you believe your organisation was in shaping the EU AI Act?
10. What factors do you think contributed to or hindered your success, and would you approach your engagement differently in the future?

The data analysis focuses on a human-level interpretation of the collected data. This approach involves understanding the literal content of the interviews and documents, but it also seeks to uncover the underlying meanings, implications, and contexts of the information provided. This analysis does not rely on systematic coding but rather on a thoughtful, comparative process that triangulates the findings from interviews, document analysis, and media analysis. By comparing the insights gathered from these different sources, the analysis aims to build an understanding of the strategies, challenges, and impacts of Croatian interest groups in the context of the EU AI Act. This method allows for a nuanced interpretation that considers the subtleties of human communication and the complex dynamics of political engagement.

## 4. Croatian Interest Groups Engagement

Recent data from Eurostat reveals that in 2023, 7.9% of Croatian enterprises with 10 or more employees utilised AI technologies, slightly below the EU average of 8%. This positions Croatia near the middle of the spectrum in terms of AI adoption among EU member states. Denmark, Finland, and Luxembourg lead with the highest percentages, while Romania, Bulgaria, and Poland lag significantly behind. These statistics are important for understanding the tech ecosystem in which Croatian interest groups are operating as they lobby the EU AI Act. The usage of specific AI technologies in Croatian enterprises also provides insight into the practical applications and perceived benefits of AI within the country. For instance, AI-based software for automating workflows and assisting in decision-making is the most commonly used technology, followed by text mining and machine learning for data analysis. This trend aligns with the broader EU pattern, where automation and data analysis are the primary drivers of AI adoption ([Eurostat, 2024a](#); [Eurostat, 2024b](#)).

Furthermore, the size of enterprises significantly influences AI adoption rates. In Croatia, 7.0% of small enterprises, 11.2% of medium enterprises, and 19.3% of large enterprises reported using AI technologies in 2023. This disparity is also observed at the EU level, where 6.4% of small enterprises, 13% of medium enterprises, and 30.4% of large enterprises utilise AI. The higher adoption rates among larger enterprises can be explained by several factors. Large enterprises often have greater financial resources to invest in AI technologies and can benefit from economies of scale. They also possess the organisational capacity to integrate complex AI systems into their operations. On the other hand, smaller enterprises may struggle with the high costs and technical challenges associated with AI implementation. These differences highlight the need for tailored policy measures that support AI adoption across all enterprise sizes and, in particular, ensure that SMEs are not overburdened with regulation ([Eurostat, 2024a](#); [Eurostat, 2024b](#)).<sup>10</sup>

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<sup>10</sup> As far as citizen sentiment regarding AI is concerned, Alen Mrvac from Moj Posao highlighted a study showing that about one-fifth of Croatians fear job losses due to technological advancements, while nearly half believe the benefits of automation and robotization outweigh the drawbacks. The study revealed that both younger and older workers share similar concerns, with those less educated more worried about job impacts, while highly educated individuals are more optimistic about technological progress. Mrvac emphasised that AI might replace some creative jobs, but those who continuously develop their skills are less at risk. Notably, 77% of respondents view technological advancements as an opportunity for lifelong learning, particularly in the IT sector, indicating a strong belief in technology's potential to create new job opportunities amidst these challenges (HRT, 2023).

As the statistics reveal, Croatian enterprises are gradually embracing AI technologies, albeit at a pace slightly below the EU average. This slow yet steady adoption rate reflects the broader challenges and opportunities within Croatia's tech ecosystem, where the integration of AI is increasingly seen as essential for maintaining competitiveness in a rapidly digitalizing economy. The disparity in AI usage between small, medium, and large enterprises further emphasises the need for targeted support, particularly for SMEs, to ensure they are not left behind in this technological shift. These insights set the stage for understanding the landscape in which Croatian interest groups operate as they engage with the EU AI Act.

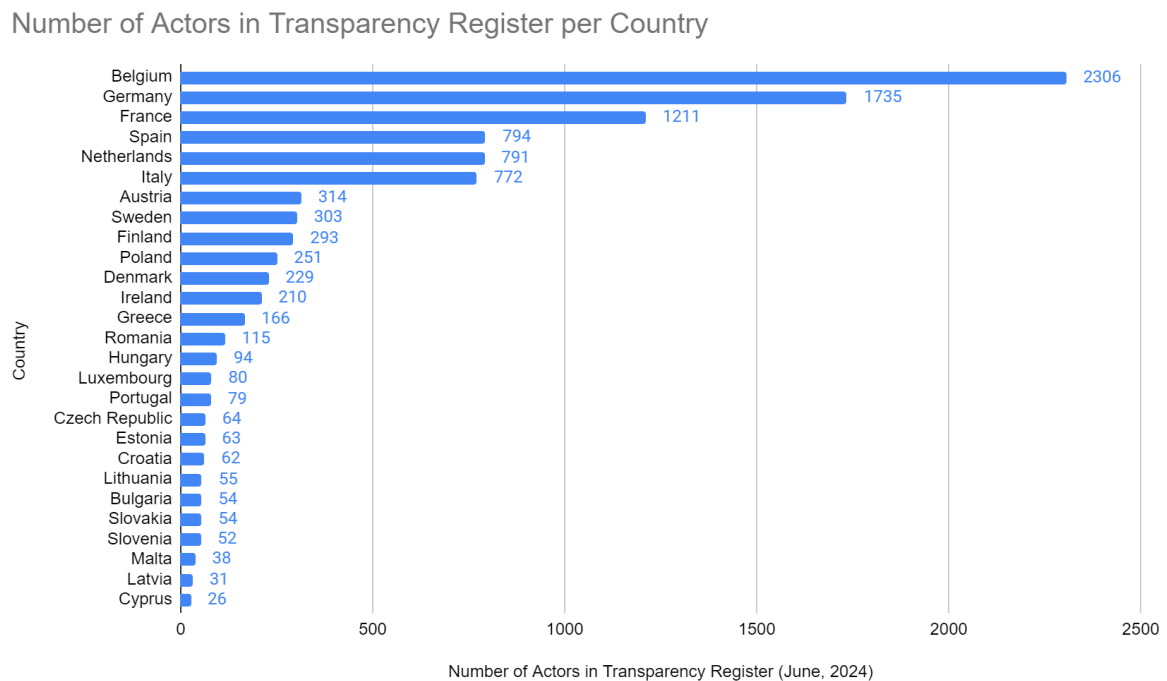
## **4.1 Results from document-level analysis**

### **4.1.1 Data from the Transparency Register and Have Your Say Portal**

Figure 1 illustrates the “Number of Actors in the Transparency Register per Country” and reveals the substantial disparities in the level of engagement across EU member states and other countries within the European Union's legislative processes. Belgium, Germany, and France lead with 2,306, 1,735, and 1,211 registered entities respectively, highlighting their significant involvement in EU policymaking. This predominance is likely attributable to their proximity to Brussels, robust economies, and the presence of key EU institutions within their borders. In stark contrast, smaller nations like Croatia, represented by only 62 actors, demonstrate much lower levels of engagement, a reflection of their limited resources and relatively modest influence within the EU (European Commission, 2024b). The disparity becomes even more pronounced when comparing Croatia's representation to that of non-EU actors such as the United States, which has 626 entities registered (European Commission, 2024b). This high number from the U.S. only confirms the intense lobbying presence by major tech companies like Microsoft, Meta, and OpenAI, which are heavily invested in shaping EU regulations, particularly the AI Act, to safeguard their business interests. The vast differences in lobbying budgets – where U.S. companies operate with millions of euros compared to the thousands available to most Croatian entities – further highlight the (potential) challenges Croatian organisations face in exerting influence within the EU. As we explore the engagement of Croatian interest groups with the EU AI Act, this backdrop underscores the uphill battle they face in making their voices heard amidst more resource-rich and powerful competitors.



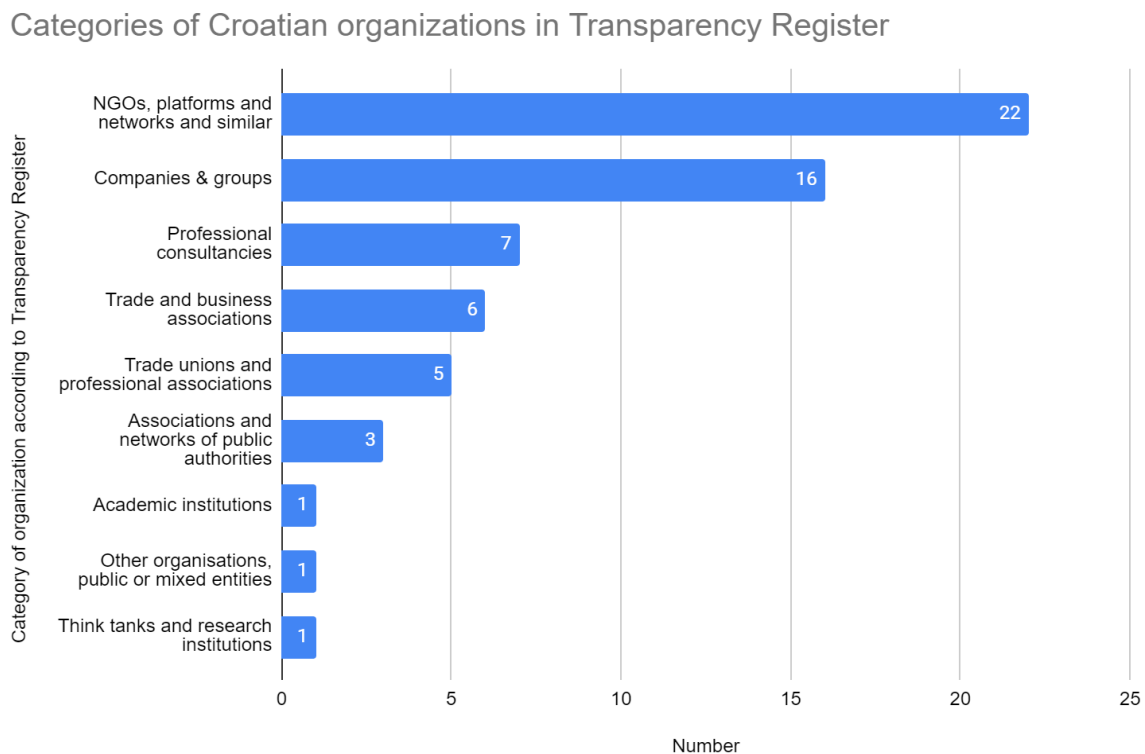
**Figure 1:** Number of interest groups from EU member states in the Transparency Register



Source: European Commission (2024b), processed by author.

Figure 2 focuses on the “Categories of Croatian organisations in the Transparency Register” and provides a detailed look at the diversity of entities from Croatia that have taken steps to influence EU policy. Notably, the largest category is NGOs, platforms, and networks, which account for 22 of the 62 Croatian entities registered. This dominance suggests that civil society groups play an important role in Croatia's efforts to shape EU legislation. Following closely are companies and groups, at 16, which indicates a notable presence of private sector interests in Croatia’s EU lobbying efforts. This is complemented by professional consultancies and trade/business associations, which together highlight the reliance on specialised knowledge and professional networks to advance Croatian interests within the EU framework. However, the minimal representation of academic institutions and think tanks, with only one entity in each category, points to a potential underutilization of research and evidence-based advocacy, which could otherwise enhance the credibility and impact of Croatia’s lobbying efforts. This landscape sets the stage for understanding the role of actors like CroAI. The need for strategic alliances, focused advocacy, and a clear understanding of how to leverage limited resources becomes apparent for actors such as CroAI, especially as they work to shape the EU AI Act.

**Figure 2:** Number of Croatian interest groups in the Transparency Register per category



Source: European Commission (2024b), processed by author.

Looking further into the Transparency Register profiles of Croatian interest groups, and particularly at organisations which refer to the term “artificial intelligence” in their respective profiles, the following organisations stand out: DOK-ING Ltd., Infobip Ltd., Mindsmiths (CroAI), Gong, and EuroNavigator Public Affairs. Their involvement in various categories such as intergroups, legislative proposals, communication activities, and associations reflects the broad and strategic engagement these organisations have within the EU’s policy-making processes. Without direct AI mentions in their profiles, but still expected to be involved with the AI Act, are Croatian entities like Faktograf, the Croatian Chamber of Economy (HGK), and the Croatian Employers' Association (HUP), each of which plays a role in shaping public discourse, economic policy, and labour relations in ways that intersect with AI’s broader societal impacts.

DOK-ING Ltd., a company with a robust history in producing high-quality robotic systems for special purposes, has demonstrated a clear commitment to AI and digital technologies. Listed under intergroups and unofficial groupings, DOK-ING's involvement suggests a focus on aligning its innovations with EU-level security and defence policies. The mention of AI in the

context of DOK-ING's goals underscores the company's dedication to not only meeting market needs but also addressing societal challenges through technological advancements. Infobip Ltd., a global leader in communication technology founded in 2006, is a member of multiple associations, including the Croatian Artificial Intelligence Association (CroAI). Infobip's commitment to advancing communication platforms and its involvement in CroAI, among other bodies, highlights its role in fostering AI innovation within the communication industry. Mindsmiths and CroAI represent the spear of Croatia's AI endeavours. Their listing under multiple categories, including EU Legislative proposals/policies, communication activities, and participation in EU-supported forums and platforms, signifies their proactive approach in influencing AI-related legislative frameworks. CroAI's contributions to the European Commission's White Paper on Artificial Intelligence and their detailed policy positions reflect their deep engagement in shaping the AI Act. Gong, known for its interdisciplinary approach as a research laboratory, social watchdog, and think tank, has a broad portfolio of contributions to EU policies. Although AI is not the core of Gong's mission, their involvement in digital democracy and responsible media intersects with the ethical implications of AI technologies.

EuroNavigator Public Affairs, a consultancy operating at the intersection of Zagreb and Brussels, has played a pivotal role in advancing Croatian interests within the EU's policy-making sphere, particularly concerning the AI Act. Notably, CroAI enlisted EuroNavigator at the very early stages of the legislative process to spearhead its lobbying efforts for the AI Act. This strategic partnership was further reinforced by the fact that Milly Doolan, EuroNavigator's managing director, simultaneously served as CroAI's head of public policy during this crucial period. As it will become clear from the expert interviews, through its extensive network and expertise in public and regulatory affairs, EuroNavigator was instrumental in ensuring that CroAI stakeholders' voices were not only heard but also influential in the formulation of the AI Act.

Despite not explicitly mentioning artificial intelligence in their Transparency Register profiles, companies like Končar and Rimac Technology are intrinsically linked to the ongoing developments and regulatory frameworks of AI in the European Union, particularly the AI Act. Končar, a leading Croatian company in the high-tech sector, has integrated AI into its digital solutions, particularly through its subsidiary Končar – Digital. Rimac Technology, a key player in the high-performance electrification technologies for the automotive industry, is intertwined with the evolving AI landscape, particularly through its autonomous driving project Verne,

formerly known as Project 3 Mobility. This project involves the development and mass production of fully autonomous electric vehicles, set to be manufactured in a state-of-the-art facility in Zagreb by 2026 (HRT, 2024c). As a current member of CroAI, Rimac is, like Infobip, embedded within a network that actively influenced the AI Act. The relevance of the EU AI Act to Rimac is notable, as the Act’s regulations on high-risk AI systems, including those in transportation, will directly impact how Rimac develops and deploys its autonomous technologies (European Commission, 2024a).

The financial landscape of lobbying activities by Croatian interest groups, as outlined in the Transparency Register, provides insights into the dynamics of influence at the EU level. The annual costs associated with these lobbying efforts reveal the extent to which different actors are able and willing to invest in shaping policy outcomes. The variation in budgets among these organisations highlights a stratified approach to lobbying, where larger companies and more established entities like Končar Elektroindustrija d.d. and Rimac Technology d.o.o. are able to allocate larger resources, with annual lobbying costs ranging between €100,000 and €199,999. Conversely, smaller entities like Mindsmiths (CroAI) and Gong, with lobbying budgets between €10,000 and €24,999, operate on a much tighter budget. Despite their more modest financial capabilities, these organisations still engage actively in the lobbying process, leveraging focused advocacy to make an impact. Similar can be said of entities like Faktograf and the Croatian Employers' Association, also with limited lobbying budgets, who likely rely on more cost-effective lobbying strategies in achieving their goals.

EuroNavigator Public Affairs, a public affairs consultancy, provides an interesting case with its client-based revenue model. For example, DOK-ING Ltd., Infobip, and Mondo Inc. are among the key clients, with EuroNavigator earning between €10,000 and €49,999 from each, depending on the complexity and scope of the legislative issues at stake. The total revenue generated from these clients, including Amazon Web Services and Meta, reflects the broad spectrum of digital and industrial policies that EuroNavigator engages with on behalf of its clients, ranging from the Digital Services Act and Digital Markets Act to sector-specific strategies like the Defence Package and Hydrogen Strategy.

**Table 1:** Data on companies working with EuroNavigator

Client	Revenue (€)	Key Legislative Issues Covered
Infobip	10,000 - 24,999	Cloud Rulebook, DMA

Mondo Inc.	25,000 - 49,999	Media Freedom Act, Digital Services Act
Amazon Web Services	10,000 - 24,999	DSA, DMA, Shaping Europe's Digital Future
DOK-ING Ltd.	25,000 - 49,999	Defence Package, Strategic Compass, Hydrogen Strategy, Circular Economy
Orqa	<10,000	Chips Act
Meta	<10,000	DSA, DMA, Privacy Shield, Copyright

Source: European Commission (2024b), processed by author.

For Croatian interest groups these insights suggest that while financial resources are important, the effectiveness of lobbying likely needs to be enhanced through strategic partnerships, targeted advocacy, and leveraging niche expertise. In sum, the financial data from the Transparency Register underscores the importance of resource allocation for lobbying efforts. This financial stratification in lobbying expenditures among Croatian actors illustrates the varied approaches to influencing EU policy, ranging from high-budget, broad-spectrum lobbying to more targeted, issue-specific advocacy.

#### **4.1.2 Data from the Permanent Representation of Croatia to the European Union**

The data on meetings between Croatian diplomatic representatives and various interest groups, as documented by the Permanent Representation of Croatia to the European Union, offers additional insights into the nature of Croatian lobbying efforts at the EU level. Specifically, the meetings involving Ambassador Irena Andrassy and Deputy Permanent Representative Paula Letunić with key players in the technology and digital sectors (Infobip and Rimac) suggest that these interactions may have been strategically aligned with ongoing discussions on AI and other technologies in the EU. Unfortunately, the topics of their meetings aren't published, so only general conclusions can be made.

Namely, between October 2019 and August 2024, only six Croatian companies and one business association (Croatian Employers' Association, or HUP) met with the Head or Deputy Head of Permanent Representation, which suggests that although the Permanent Representation can play an important role in shaping national positions on EU policies, it is underutilised by Croatian interest groups. This limited engagement indicates a rather low level of interest and capacity among Croatian groups to leverage this channel, despite its potential

as an alternative access point for experienced and well-resourced organisations registered in the EU Transparency Register (Vidačak, 2024: 50).<sup>11</sup>

Based on the data provided by the Permanent Representation, only business interest groups appear to use this channel of influence, a finding consistent with Vidačak’s (2024) observation. This pattern underscores the fact that business-driven entities, like Infobip and EuroNavigator, are more active and resourceful in utilising the Permanent Representation for lobbying purposes. The fact that EuroNavigator participated in some of these meetings is particularly significant. It highlights how intertwined relationships within the Croatian lobbying ecosystem can enhance the effectiveness of advocacy efforts at the EU level. This dual role likely amplified CroAI’s capacity to lobby effectively, particularly in the context of the AI Act.

**Table 2:** Croatian companies’ meetings with the Permanent Representation of Croatia to the European Union

Ambassador	Date	Company
Štefanić	16.01.2020.	Vlahović Group
Andrassy	28.01.2020	Vlahović Group
Štefanić	06.11.2020.	Alpheus
Andrassy	01.06.2022.	DOK-ING Ltd.
Andrassy & Štefanić	17.11.2022.	Infobip; Euronavigator
Andrassy	26.1.2023.	Project 3 Mobility
Andrassy	21.4.2023.	DOK-ING Ltd.
Andrassy	30.10.2023.	DOK-ING Ltd
Andrassy / Letunić	25.01.2024.	Euronavigator

Source: the Permanent Representation of Croatia to the European Union (Mvep.gov.hr, 2024), processed by author

By engaging with relevant stakeholders through their Permanent Representation, Croatian diplomats are able to amplify the influence capacity of Croatian interest groups in Brussels and thereby contribute to democraticness and uniqueness of Croatian policy positions in the EU.

<sup>11</sup> Notably, the majority of meetings between EU interest groups and the Permanent Representation took place between October 2019 and July 2020. This timing corresponds with Croatia’s Presidency of the Council of the EU during the first half of 2020. In fact, records from some of these meetings explicitly indicate that discussions were centred around Croatia’s presidency and its priorities for that period.

Yet, it must be said that the current state of AI policy in Croatia is characterised by a cautious alignment with European Union regulation, particularly with the recently adopted EU AI Act. A notable example is the proposed AI resolution by Marija Selak Raspudić, a member of the Croatian Parliament, which sought to address key issues related to AI governance. However, the Croatian government, in its opinion issued on June 21 2024, advised against adopting the resolution, arguing that the essential aspects were already covered by national strategic documents and existing EU regulations, particularly the AI Act. The government emphasised that a new national AI strategy was unnecessary, as ongoing and forthcoming EU regulations, would be more effective in addressing the rapidly evolving technological landscape. Subsequently, on July 12 2024, the Croatian Parliament rejected the resolution with a majority vote (79 in favor, 49 against, and 5 abstentions), reflecting the executive branch's influence on legislative processes in the country (Vlada Republike Hrvatske, 2024; Hrvatski sabor, 2024).

The government's dismissal of Selak Raspudić's proposal, despite acknowledging the transformative potential of AI, is telling. It suggests that the Croatian authorities prefer to operate within the broader EU legislative context and rely on the comprehensive nature of the EU AI Act, rather than developing independent, potentially overlapping national strategies. This approach could be interpreted as a pragmatic move to ensure coherence with EU standards, yet it also reflects a potential missed opportunity for Croatia to tailor its AI strategy to local needs and to assert its own vision within the evolving AI landscape. The government's stance highlights what is perhaps a broader issue in Croatia's policy-making process, where national initiatives are often subsumed under broader EU regulation. Sadly, this stifles the development of more context-specific policies which would likely generate more engagement by Croatian citizens, that is make the whole process more democratic, and thereby make the Croatian citizens less alienated from the EU.

#### **4.1.3 Data on Croatian Artificial Intelligence Association: a case study of engagement**

After examining the involvement of various Croatian entities in the AI landscape through their listings on the European Commission's Transparency Register, it becomes evident that CroAI stands apart in its active and direct engagement with the EU AI Act. While actors like DOK-ING, CroAI, Infobip, Gong, Rimac Technology and Končar play roles in their respective domains, none has demonstrated a proactive participation in e-public consultations on the AI Act, except CroAI. This distinction is significant, as it underscores CroAI's unique position as a leading voice in Croatia's AI ecosystem. CroAI's broad and diverse membership, including

influential stakeholders such as Infobip and Rimac, positions it as an organisation that reflects the interests of a larger set of actors in the Croatian AI sector. Therefore, what follows is a more focused study on CroAI and its efforts to influence the AI Act. This micro case study will delve, however limitedly, into CroAI's engagement with the AI Act and explore how the organisation navigated the landscape and the complexities of EU policy-making.

The feedback from the Croatian Artificial Intelligence Association, via the European Commission questionnaire during the public e-consultations phase, highlights the organisation's strong emphasis on the importance of a favourable innovation framework for SMEs. CroAI sees actions proposed in the European Commission's White Paper on AI, such as fostering partnerships with the private sector, promoting AI adoption in the public sector, and focusing on the needs of SMEs, as highly significant. The organisation also underscored the need for AI systems to adhere to European values and regulations, especially in terms of safety, human rights, and preventing discriminatory outcomes. Additionally, CroAI expressed a cautious approach toward AI regulation, and highlighted concerns about the potential risks associated with AI, including safety issues, breaches of fundamental rights, and the lack of transparency in AI decision-making processes. CroAI also supported the establishment of specific guidelines at the EU level for technologies like biometric identification in public spaces and emphasised the need for ongoing market surveillance to ensure AI systems remain safe and accountable after deployment (European Commission, 2024d).

CroAI's position paper on the European Commission's White Paper on Artificial Intelligence reflects a proactive stance towards shaping AI policy in Europe. The organisation acknowledged the significance of the European Commission's risk-aware approach to AI regulation, particularly given the rapid digital transformation accelerated by the COVID-19 pandemic. However, CroAI emphasised the need for a balanced framework that not only mitigates risks but also fosters innovation and entrepreneurship, which they believe is somewhat lacking in the current legislative proposals (European Commission, 2024d). One of the central propositions in the position paper is the introduction of an "AI sandbox" accompanied by a Code of Conduct. CroAI argued that the White Paper is heavily focused on the application phase of AI development, where technologies are already market-ready. They contended that this focus neglects the crucial incubation phase, during which AI innovations are conceived and developed. The AI sandbox is proposed as a solution to this oversight, a controlled environment where AI research and development can occur with minimal regulatory



burdens, allowing innovators to experiment and iterate freely. The association suggested that this sandbox should be lightly regulated to ensure that European AI innovators remain globally competitive (European Commission, 2024d).

CroAI also advocated for a competitive startup framework at the EU level, stressing that the White Paper's treatment of startups is insufficient. They proposed several principles aimed at simplifying the process of starting, running, and scaling AI startups in Europe. These included reducing administrative burdens, incentivizing investment, and facilitating success sharing among all contributors to a startup's growth. CroAI argued that without a unified and supportive framework across the EU, the region's startup ecosystem will struggle to reach its full potential (European Commission, 2024d). The position paper also introduced the concept of "The State as the First Client". CroAI believes that the public sector in each EU Member State has a crucial role to play in fostering AI innovation by becoming the initial client for AI startups. This would not only help public services improve through the application of AI but also create a critical mass of demand necessary for the AI industry to flourish. However, they cautioned against the State becoming the only client, advocating instead for a healthy ecosystem where startups can eventually expand beyond their initial public sector contracts into the broader international market (European Commission, 2024d). Through these proposals, CroAI sought to influence the legislative debate to ensure that the European AI ecosystem remains dynamic and competitive, while also safeguarding the ethical and societal values that the EU prioritizes. Their position paper underscored the importance of a legislative framework that balances risk management with the encouragement of innovation, positioning Europe as a leader in the global AI race (European Commission, 2024d).

In terms of lobbying their efforts, CroAI's activities were detailed in the timeline provided during the AI2Future conference they organised in 2021. Milly Doolan from EuroNavigator described there a well-orchestrated campaign to influence the development and implementation of the AI act. Starting with the European Commission's White Paper on Artificial Intelligence in February 2020, CroAI positioned itself at the forefront of discussions surrounding AI regulation. The early engagement with the White Paper provided CroAI with a strategic advantage, enabling them to influence the direction of AI policy from its inception. In June 2020, CroAI, along German and French AI organisations, co-founded the European AI Forum, an essential platform for gathering stakeholders and policymakers to discuss AI's future in Europe. This forum was crucial in amplifying CroAI's voice and ensuring that the perspectives

of Croatian and smaller EU member state tech sectors were represented in broader EU discussions. The same month, CroAI participated in a panel discussion focused on Europe's AI future, further solidifying its role as a key influencer in the ongoing legislative discussions. One of the most critical moments in CroAI's journey was in October 2020, when they directly explained the concept of AI sandboxes to the European Commission. The timeline also shows CroAI's continued involvement as the AI Act progressed. In December 2020 and April 2021, they responded to the initial AI Act proposal and engaged in exclusive briefings with the Act's drafters. This sustained engagement allowed CroAI to influence key aspects of the AI Act, particularly around the provisions for regulatory sandboxes. Their focus on ensuring these sandboxes remained flexible and supportive of innovation is evident in their continued advocacy, culminating in their push for measures to support these sandboxes in August 2021. Overall, CroAI's lobbying strategy was methodical and persistent because it leveraged various forums, direct engagements with the Commission, and a focus on regulatory tools like sandboxes to shape the AI Act (Youtube, [2021](#)).

#### **4.2 Expert interviews – results**

Although the initial aim of this research was to conduct at least five expert interviews, several challenges limited the number to just two. Once again, these were difficulties in scheduling, time constraints, and interviewees' willingness to be interviewed. Although the limited number of conducted interviews limits the scope of this research's findings, what still ensures a valuable finding is that a comprehensive engagement with the AI Act in Croatia was predominantly led by a single organisation: CroAI. As the research unfolded, it became clear that most other actors in Croatia were not significantly engaged in AI policy at the EU level during its critical formative stages. This lack of broader engagement among Croatian stakeholders reduced the availability of potential interviewees who could provide meaningful insights into the AI Act's legislative process and lobbying strategies connected to it.

The limited number of interviews, however, should not diminish the value of the insights gained from the two experts in the field. In other words, the two successfully conducted interviews still offer a deep and focused understanding of CroAI's pioneering efforts in AI policy advocacy. The first interview, referred to as Interview 1, was conducted with a high-ranking, executive-level member of CroAI, who offered a current perspective on the organisation's efforts and the ongoing relevance of the AI Act. This interview's insights will mostly be used in the following chapter, as the interviewee wasn't a member of CroAI during

its very early stages, when the most of its intensive lobbying efforts regarding the AI act occurred. The second interview, referenced as Interview 2, was conducted with an executive-level, public affairs expert from EuroNavigator, who played a central role in shaping CroAI's lobbying strategies. This interview provided a detailed and rich account of the strategic decisions, challenges, and successes experienced by CroAI during its engagement with the AI Act.

### **CroAI's and EuroNavigator's engagement with the EU AI act**

“A cosmic alignment of circumstances”, is how a public affairs expert at EuroNavigator describes the start and the later success of their collaboration with CroAI in lobbying the EU AI Act (Interview 2, 2024). Namely, EuroNavigator's involvement began in late 2019, a period marked by the growing significance of artificial intelligence in Brussels. They emphasised that the timing of their engagement coincided with the European Union's initial legislative efforts to regulate AI, particularly following the release of the European Commission Communication on Artificial Intelligence in 2018, which indicated that a more comprehensive legislative process was about to begin (Interview 2, 2024; European Commission, 2018). Moreover, EuroNavigator's interest in the EU's AI regulation coincided with CroAI's inception, founded in December 2019. Recognizing the growing importance of AI, EuroNavigator began closely monitoring developments and identifying potential stakeholders within Croatia who might be engaged in AI regulation. At the same time, and just as the Croatian Presidency of the Council of the EU began, CroAI started to seek for a public affairs firm to represent their interests in Brussels. Also at that time, in February 2020, the Commission's White paper On Artificial Intelligence was published as an early draft for which contributions and feedback were sought via the Have Your Say Portal (European Commission, 2020).

### ***Formulating organisation's goals, clear messages and policy positions***

In its lobbying efforts for the EU AI Act, CroAI had two primary goals that guided its strategy. The first goal was to demystify artificial intelligence for the general public and make it more accessible. This was pursued through initiatives like the Elements of AI program, which aimed to educate and engage the broader population on AI topics. By raising public awareness, CroAI sought to create a more informed citizenry that could engage with AI issues and understand the implications of AI policies (Interview 1, 2024).

The second goal of CroAI was to influence AI policy by ensuring that the needs and perspectives of smaller players, particularly SMEs, were represented in the legislative process. Recognizing that Big Tech companies already had established positions and will likely exert significant influence, CroAI focused on advocating for what they thought was missing in the early proposal of EU's AI regulation (the White paper on AI): a European-centric approach that would support innovation among smaller entities. This approach was aimed at ensuring that the AI Act would not only reflect the interests of Big Tech but also support the growth and innovation potential of SMEs within Europe (Interview 2, 2024).

When asked how CroAI formed its opinion on the EU AI Act, the interviewee explained that the process was both exploratory and challenging, given the early stages of the AI sector in Croatia. The initial step involved establishing a mini working group to gather individuals who were genuinely interested in the legislative process. The tech community was divided – some were focused solely on innovation and indifferent to policy, while others recognized the importance of engaging in decision-making processes. This group spent significant time discussing what they wanted to convey, using the European Commission's White Paper on AI as a starting point. However, they quickly identified a gap in the White Paper, particularly regarding the needs of small innovators, which led to the early conception of the “regulatory sandbox” as a crucial element of their advocacy (Interview 2, 2024).

The process of finalising CroAI's stance was collaborative and iterative. The interviewee noted that the working group, though small – comprising about four or five active members – went through ten versions of their stance before reaching a final consensus.<sup>12</sup> Key contributors included (but were not limited to) Mislav Malenica from Mindsmiths, Ratko Mutavdžić from Microsoft, who provided valuable insights, and a member of Velebit AI, an AI-focused agency from Croatia. Once a draft was finalised, it was distributed among the CroAI's members for feedback. This process was necessary, especially given the nascent stage of both CroAI and the AI sector in Croatia, where the idea of forming opinions on upcoming legislation was still relatively new and uncharted territory (Interview 2, 2024). It's worth commenting here that back then CroAI did not have the 450+ members it has today, including Rimac and Infobip as

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<sup>12</sup> Reflecting on the small size of the working group, the interviewee commented that this is typical in interest groups. Out of 20 members, usually half will decline to participate, because policy “bores” them. Of the remaining 10, about half will express interest, but only five will actively engage, while the other five prefer to stay informed without direct involvement. As a result, the core group was quite small, consisting of just four or five dedicated individuals (Interview 2, 2024).

bigger players, so it's not that the working group was exclusive; there simply weren't many parties interested in the EU's AI policy at that time.

One of the initial challenges CroAI faced, once their policy position was formed, was its identity as a newly founded association that few people were aware of, so the task was to build its profile and establish credibility. Additionally, there was a general lack of understanding about artificial intelligence among the public and policymakers, making it crucial to effectively communicate what AI is and why it matters. To address these challenges, CroAI focused heavily on public relations in the early stages, with Malenica frequently appearing in the media, which helped generate significant coverage and interest in AI – something relatively new and unknown at the time, so it attracted organic media interest (Interview 2, 2024).

Central to their strategy was the creation of a clear and digestible message for policymakers. The interviewee highlighted that, while engineers might grasp the intricacies of AI on a deeper level, it was vital to translate these complex concepts into terms that the average policymaker could easily understand (Interview 2, 2024). This required simplifying the technical jargon without losing the core message, ensuring that their advocacy efforts were accessible and compelling. This approach was critical in aligning CroAI's communication with the needs of their audience, enabling them to effectively convey their positions on AI policy. After refining their message, EuroNavigator and CroAI then focused on building relationships with both EU and Croatian policymakers, but they also focused on building coalitions and maintaining a consistent message flow across all levels of their engagement, which were seen as key goals in their overall strategy (Interview 2, 2024).

### ***Engagement strategies: covering multiple venues and building relationships***

CroAI's and EuroNavigator's engagement strategies for influencing the EU AI Act involved a multifaceted approach at both the EU and the national level. At the EU level, they did not limit its advocacy efforts to participating in the official e-consultation process through the Have Your Say Portal, which was covered in the document-level analysis of this research. Instead, they proactively reached out to Croatian Members of the European Parliament (MEPs), various units within the European Commission responsible for AI, and even the offices of the Commissioners handling AI-related topics. This broad outreach was met with significant interest, as many in Brussels were keen to hear the perspective of a Croatian association (Interview 2, 2024). The feedback CroAI received was overwhelmingly positive, helping them establish strong relationships with key stakeholders, including the European Commission unit

that later played a central role in drafting the AI Act. These relationships were further strengthened as representatives from these EU bodies attended some of CroAI's events, such as the first European AI forum held online in June 2020, which was attended by executive-level members of the European Commission such as Margrethe Vestager, Maroš Šefčovič and Dubravka Šuica (Interview 2, 2024).<sup>13</sup>

On the national front, CroAI and EuroNavigator utilised their position on the White paper and made sure to send their stance on it to relevant stakeholders in Croatia. They established early contact with the Ministry of Economy, which was responsible for AI policy issues. The ministry, according to the interviewee, was very receptive. The unique, informal approach of CroAI members – rooted in the startup culture – seemed to resonate well with the ministry, leading to a positive and ongoing relationship. Additionally, CroAI made efforts to keep other key national figures in the loop, including the Prime Minister's office and the President of Croatia, although their engagement with the Parliament was more limited: “We had the least contact with the [Croatian] Parliament. We wanted to hold a thematic session at one point, but that happened much later” (Interview 2, 2024).

At the intersection of the EU and national-level engagement, CroAI and EuroNavigator also prioritized its relationship with the Permanent Representation of Croatia to the EU. They sent its stance to the Permanent Representation and followed up with in-person meetings: “We had in-person meetings with them as well. We had excellent relations with the lead attaché at the time, who was covering AI, and of course, with the ambassador and the deputy ambassador. So we briefed them all and kept them informed about our contacts with the Commission”

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<sup>13</sup> The strong relationships between EuroNavigator, CroAI, and key EU stakeholders are further demonstrated by the involvement of various high-profile figures in a panel discussion on artificial intelligence organised by CroAI and moderated by EuroNavigator in June 2020. This event, which coincided with the European Commission's announcement of the White Paper on AI, featured speakers such as Karlo Ressler, a Croatian MEP, Viktor Šober, Minister-Counselor for Telecommunications and the Information Society at the Permanent Representation of Croatia to the EU, Lucilla Sioli, Director for Artificial Intelligence and Digital Industry at the European Commission, and Mislav Malenica, President of CroAI and CEO of Mindsmiths. This panel was particularly significant as it marked the conclusion of the public consultation on the White Paper and brought valuable perspectives from Croatia, the youngest EU member state and the then-President of the EU Council. The participation of such key stakeholders underscores the credibility and influence that EuroNavigator and CroAI had in shaping the AI discourse at both the national and EU levels (KarloRessler.eu, 2020). The close relationship between EuroNavigator, CroAI, and the European Commission is also reflected in the direct communication they maintained throughout the legislative process of the AI Act. At one point, after the draft AI Act was released, the European Commission reached out to CroAI for help in obtaining Croatia's official stance, as the Croatian authorities had not yet responded with the national position they had been requested to present (Interview 2, 2024).

(Interview 2, 2024). This comprehensive and consistent approach to stakeholder engagement highlights EuroNavigator's strategic understanding of the importance of keeping all relevant parties continually informed and involved. In other words, EuroNavigator emphasized the importance of consistent and continuous communication with all stakeholders. They recognized that simply holding a single meeting with a policymaker was not enough, as these officials often deal with multiple issues simultaneously. EuroNavigator understood the need for persistent follow-up to ensure that their issue remained a priority (Interview 2, 2024).

### ***Coalition-building: the European AI Forum and forming domestic coalitions***

In April of 2020, CroAI made a significant stride by publishing their stance on the European Commission's White Paper on AI. This was followed by the launch of the already mentioned European AI Forum in June, during Croatia's presidency of the EU Council. Originally planned as a physical gathering of stakeholders, the event was moved online due to the COVID-19 pandemic. Despite this shift, the forum was highly successful, attracting prominent speakers from the European Commission but also the Croatian President Zoran Milanović. This event played a crucial role in amplifying CroAI's voice in the European AI discourse.

The coalition-building efforts of CroAI and EuroNavigator were strategically timed but also cosmically aligned with Croatia's EU Council Presidency. During this period, CroAI strengthened its ties with German and French AI associations, which were already collaborating and seeking to unite the European AI startup community. The presidency provided an opportune moment for CroAI to co-found the European AI Forum alongside these associations, marking a significant alignment of interests. This collaboration was not just about establishing connections but also about ensuring that Croatia, as a small-member state, played a proactive role in the broader European AI landscape (Interview 2, 2024).

As part of their lobbying strategy, CroAI also recognized the need to build a broader coalition within Croatia to support their stance on the AI Act. They reached out to established organisations like HUP ICT, the Croatian Chamber of Economy, and CISEX, successfully securing their backing. A joint letter, endorsed by these organisations, was sent to the Croatian government, presenting it as the unified stance of the Croatian AI community. After CroAI presented their position on the AI Act to the Ministry of Economy, it initiated a process where the Ministry, in response to requests from the Permanent Representation of Croatia to the EU, would reach out to relevant stakeholders within the country. These stakeholders formed a

working group and included CroAI, the Croatian Chamber of Economy, HUP ICT, and APIS IT, according to the interviewee. Each time the Croatian Permanent Representation needed Croatia's official opinion on AI-related matters, the Ministry would send out emails to these stakeholders, seeking their input. Yet, it is important to note here that despite the Ministry of Economy's regular requests for input on AI policy, CroAI often found themselves as the only respondent, which highlights their leadership in shaping Croatia's position on AI regulation (Interview 2, 2024).

### *Perceptions of effectiveness*

In reflecting on the effectiveness of their efforts surrounding the EU AI Act, the interviewee conveyed a sense of both achievement and reflection on areas that could have been improved. The inclusion of the regulatory sandbox in the final version of the AI Act was highlighted as a significant success, particularly given the challenges and the nascent stage of AI policy development in Croatia at that time. However, there was also an acknowledgment that the final outcome was not perfect. Ideally, the sandbox would have been implemented in a way that minimized bureaucratic hurdles, such as the need for constant communication with regulatory bodies. Despite these imperfections, the interviewee expressed satisfaction with the overall impact of their work, emphasizing that the very presence of the sandbox in the legislation was a major win, especially considering the skepticism and the lack of awareness and engagement that initially surrounded the AI Act within Croatia (Interview 2, 2024).

At the outset of their lobbying efforts, the landscape in Croatia was quite barren in terms of organized efforts to influence upcoming legislation on AI. The general attitude was one of indifference or confusion – many stakeholders didn't grasp the significance of the AI Act or why it warranted attention. This indifference posed a challenge for CroAI and its partners, who were essentially pioneering in a space where no other Croatian entities were actively engaged. Despite these challenges, the response and success that CroAI achieved were remarkable, particularly for such a small and relatively new organization. Their strategy was bolstered by the PR expertise of CroAI members, including Jan Štedul, a member of CroAI since its inception and a former media professional with a deep understanding of narrative crafting. Štedul's ability to communicate the significance of AI in an accessible and compelling way helped CroAI stand out in the public eye. Finally, the interviewee explained that CroAI was also seen as a "shiny new object" in the EU policy landscape, meaning it attracted interest not



only from within Croatia but also from European stakeholders who were intrigued by this new player on the EU lobbying scene (Interview 2, 2024).

The interviewee further emphasised that their proactive engagement in the AI legislative process was particularly successful for several reasons. Firstly, Croatia is not typically seen as a leader in EU policymaking; it often takes a more passive role, observing the situation before aligning with a more prominent member state: “From our perspective at EuroNavigator, as people who work with Brussels, Croatia often doesn’t have a strong voice or a clear stance. It tends to observe the situation and then align with one side or the other. I think it was very interesting to people in Brussels that someone from Croatia got involved in such a big topic so early on” (Interview 2, 2024). However, through CroAI and its partners, Croatia took an early and active role in shaping the conversation around AI. This was both surprising and refreshing to policymakers in Brussels, who were used to hearing from the usual big lobbying players. The timing of Croatia’s EU Council Presidency also played a crucial role, explained the interviewee, because it provided an opportune moment for CroAI to position itself as a key voice in the discussion (Interview 2, 2024).

Furthermore, CroAI’s advocacy for the startup community and SMEs aligned well with the broader policy directions that the EU was pursuing, particularly concerning European strategic autonomy. This alignment, coupled with the fresh perspective that CroAI brought to the table, helped them gain credibility and influence in a space dominated by more established and resource-rich Big Tech organizations. The interviewee stressed that the effectiveness of their efforts was not due to any single factor but rather a combination of some favourable circumstances, well-executed strategies and the ability to get people interested in their cause. They highlighted the importance of making sure that what they were advocating for was not only well-written and meaningful but also resonated with a broader community beyond just their immediate interests (Interview 2, 2024).

Finally, the interviewee reflected on the importance of building relationships and maintaining a consistent presence. In Brussels, where reputations are crucial, it was vital that CroAI and its partners were not seen as just another group but as a credible and significant player. This required a concerted effort to ensure that all stakeholders, from the Permanent Representation to MEPs and other EU institutions, were consistently informed and engaged (Interview 2, 2024).

## 5. Analysis and Discussion

### 5.1 Theoretical and Practical Contributions

This section of the thesis aims to explore the theoretical and practical contributions derived from the case study of Croatian interest groups' engagement, particularly CroAI's, with the EU AI Act. While it is important to acknowledge the limited engagement of Croatian interest groups in general in this specific legislative process and the consequent challenges in generalising the findings, the insights gained from the document analysis and conducted interviews still offer some valuable perspectives. Despite the small scale of involvement, with CroAI as a primary actor, the strategies employed and the relationships formed during their lobbying efforts provide a unique lens through which to examine broader themes in EU policymaking and interest group influence. I believe these findings contribute to both the theoretical understanding of lobbying within the EU and the practical implications for interest groups operating in similar contexts, because they highlight key strategies that can be employed by smaller organisations from smaller EU member states to effectively engage in the EU legislative processes.

The interview insights underscore the strategic advantage of early lobbying, particularly during the White Paper phase, in effectively shaping EU legislation. Bouwen's (2009) finding that lobbying during the early stages of policy formulation is more effective is supported by the experiences shared in the interviews. By engaging with the European Commission at this critical juncture, CroAI positioned itself as an unlikely vocal player in the legislative process surrounding the AI Act. This early involvement allowed them to influence the foundational aspects of the legislation before it became more rigid and difficult to alter later in the process. Moreover, the interview findings also align with Bouwen's (2004) exchange theory, which emphasises the reciprocal nature of the relationship between lobbyists and policymakers. CroAI's ability to provide "access goods" to the EU policymakers, particularly expert knowledge and information relevant to both the European and domestic interests scene, played an important role in establishing their influence.<sup>14</sup>

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<sup>14</sup> In this context, CroAI's efforts to consistently involve legislators in their meetups across different locations in Croatia, whether in Zadar, Rijeka, or elsewhere, served as a platform for establishing trust and demonstrating their value as a source of expertise on AI. By inviting policymakers to these events and encouraging them to engage in discussions about the potential of AI, CroAI not only positioned

The distinction between in-house lobbyists and commercial lobbyists played a role in understanding the dynamics of EU lobbying, particularly in the context of CroAI's advocacy efforts. Commercial lobbying firms, which represent multiple clients across various issues, add a layer of complexity to the EU lobbying landscape. These firms, often referred to as "hired guns," bring specialized expertise that goes beyond what in-house lobbyists can typically offer (Ellis & Groll, 2023). Their ability to navigate multiple interests and issues simultaneously gives them greater access and influence within the policymaking process. In the case of CroAI, the collaboration with EuroNavigator, a public affairs firm, exemplifies the strategic advantage of engaging a commercial lobbyist who can provide the necessary resources and knowledge to influence the EU AI Act effectively.

When it comes to lobbying strategies, CroAI and EuroNavigator employed both inside and outside lobbying tactics. Inside lobbying was central to CroAI's and EuroNavigator's strategy. This approach, based on building consistent relationships with relevant policymakers, included face-to-face meetings, email exchanges, and participation in expert committees, all aimed at gaining access to key decision-makers and influencing the legislative process from within (de Bruycker & Beyers, 2018). In addition to inside lobbying, CroAI and EuroNavigator recognized the importance of outside lobbying strategies, though most of it was done by CroAI's PR experts. For CroAI, outside lobbying was not just about garnering public attention and making the organisation recognizable; it was also about creating a broad-based coalition that included various stakeholders, from industry players to government bodies (Interview 1, 2024).

The success of CroAI's lobbying efforts can also be attributed to their strategic collaboration with other interest groups and stakeholders, forming coalitions that amplified their influence. By seeking and partnering with organizations like the Croatian Chamber of Economy and HUP ICT, CroAI was able to pool resources and present a cohesive stance on AI regulation. This coalition-building strategy, as noted by Klüver (2013), is essential in enhancing political influence, particularly in complex policy areas like AI where diverse perspectives and expertise are needed. The ability to mobilize a wide range of political resources and engage multiple

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itself as an essential partner in the legislative process but also provided legislators with valuable insights and technical knowledge that they needed (Interview 1, 2024).

policymakers across different levels of government was important to CroAI's success in shaping the AI Act.

## **5.2 Implications for Croatian policy influence**

The implications of CroAI's engagement with the EU AI Act provide a lens through which to analyze the broader challenges and opportunities for Croatian policy influence within the EU. Vidačak's (2024) findings have already highlighted how Croatian interest groups have historically faced difficulties in effectively engaging at the EU level due to limited resources and inadequate strategies. This has been compounded by the Croatian government's non-transparent management of EU affairs and the absence of robust consultation mechanisms (Vidačak, 2024). Despite these systemic challenges, CroAI's experience, particularly during the early stages of lobbying for the AI Act, demonstrates how targeted and well-coordinated efforts can overcome these barriers and lead to policy influence. Additionally, CroAI's coalition-building strategy, particularly its collaboration with German and French AI associations during Croatia's EU Council Presidency, reflects a strategic alignment that enhanced Croatia's role in the European AI landscape.

The interview insights also confirm several of Vidačak's findings regarding the challenges of Croatian engagement at the EU level. The frequent lack of timely responses from Croatian ministries, as illustrated by the Ministry of Economy's interactions with CroAI, points to the systemic issues of time pressure and inadequate resources within Croatian public administration. However unlikely this may sound to an average Croatian reader who thinks that Croatian bureaucracy is overinflated, that fact is the opposite. This was something stressed by the interviewee from EuroNavigator: "People don't realize this. But I think even more people should work in public administration because I think it's so challenging for them. There are so many new policies being developed by the EU that need to be followed by someone. In the technological context, in the development of technologies, in the development of medicine, more and more new areas are emerging, and the state has to keep up with all of them" (Interview 2, 2024). This perspective underscores the need for an expansion of state bureaucracy, particularly in sectors that deal with rapidly advancing fields like AI. It also suggests that without a sufficiently staffed and skilled public administration, Croatia will continue to struggle with timely and effective participation in EU policymaking processes. This

is consistent with the views of one government representative interviewed by Vidačak, who attributed the shortcomings in the Croatian government's EU engagement to both resource constraints and a general unwillingness to take on the additional workload required to manage these complex and fast-moving dossiers (Vidačak, 2024: 49-50). Thus, the interview highlights the necessity for structural reforms within Croatian public administration to better equip it for the demands of active participation in the EU's legislative processes.

Finally, the interviewee's anecdote about the European Commission reaching out to CroAI for updates on Croatia's stance on the AI Act further underscores the disconnect between national and EU-level processes in Croatia. This situation aligns with Vidačak's critique of the Croatian government's approach to managing EU affairs, which is perpetuating an elitist and undemocratic process that excludes broader Croatian public and interest group participation from EU policymaking.

## 6. Conclusion

### 6.1 Summary of Findings

This thesis explored Croatian interest groups' engagement in the legislative process of the EU AI Act, focusing specifically on the roles played by CroAI and EuroNavigator, the only actors to fully engage with the Act at its very early, critical draft stages. Through a combination of interview insights and theoretical analysis, the research highlighted the critical importance of early-stage lobbying, particularly during the White Paper phase, as a means of effectively influencing policy outcomes. The findings revealed that CroAI's strategic approach, which combined inside lobbying – direct interactions with EU policymakers – with outside lobbying efforts aimed at raising public awareness, was instrumental in shaping the legislative framework in a manner that considered the needs of smaller tech players, startups and SMEs in Croatia. The research also underscored the significant role that professional lobbying firms, like EuroNavigator, play in representing multiple interests across different issues within the EU's complex policymaking landscape. The ability of these firms to navigate the multi-layered governance structure of the EU, provide expert knowledge, and build strategic coalitions proved essential in enhancing Croatia's influence on the AI Act.

The coalition-building efforts, particularly through the establishment of the European AI Forum during Croatia's EU Council Presidency, were pivotal. This forum not only brought together key stakeholders from Croatia and other EU member states but also served as a platform for CroAI to strengthen ties with influential AI associations in Germany and France, ensuring a unified European approach to AI policy. The findings also support Bouwen's exchange theory, which posits that both public and private actors are interdependent, needing resources from each other to fulfill their respective roles. In the case of CroAI and EuroNavigator, their provision of "access goods" – such as technical expertise and insights into the domestic and European encompassing interests – was important for gaining influence within the EU policymaking process (Bouwen, 2004; 2009).

Finally, the insights gathered from the interviews reinforce several of Vidačak's findings about the challenges faced by Croatia in engaging effectively at the EU level. In particular, contrary to the common perception among the Croatian public that their bureaucracy is overstuffed, the reality is quite the opposite. The interview with a EuroNavigator representative underscores this point and emphasises the need for a more robust and well-equipped public administration,

particularly in sectors and policy areas dealing with rapidly advancing technologies like AI (for instance, policies regarding space technology and virtual worlds).

## **6.2 Limitations and Future Research**

While this thesis provides insights into the engagement strategies of some Croatian interest groups in the EU legislative process, it is not without its limitations. The research primarily relied on interviews with a limited number of stakeholders, which may not fully capture the breadth of perspectives within the Croatian AI community or the wider spectrum of EU policy engagement by Croatian interest groups. Additionally, the focus on CroAI and EuroNavigator means that the findings may not be generalizable to other sectors or interest groups with different organisational structures or lobbying strategies.

Future research could expand on this study by including a broader range of interviews with diverse stakeholders, including those from government institutions, civil society organisations, and other business sectors. Such research could provide a more comprehensive understanding of the factors that influence the effectiveness of Croatian interest groups in EU policymaking. Moreover, further investigation into the specific challenges faced by Croatian interest groups – such as the impact of resource constraints and the role of informal networks – could offer deeper insights into how these groups can enhance their influence at the EU level. Another area for future research could involve a comparative analysis of lobbying strategies employed by interest groups in other small or new EU member states. This could reveal whether the challenges and successes experienced by CroAI are unique or part of a broader trend among similar countries. Additionally, exploring the role of digital technologies, media and social media in lobbying efforts, particularly in the context of increasing public scrutiny and the push for greater transparency in EU affairs, could provide valuable insights into the evolving nature of advocacy in the EU.

In wrapping up this thesis, it's clear that early engagement and strategic use of both direct and indirect lobbying tactics play a vital role in shaping EU policies. This study not only highlights the importance of these strategies but also emphasizes the broader implications for democratic engagement within Croatia. Effective lobbying isn't just about influencing legislation; it's also about ensuring that the voices of smaller member states like Croatia are adequately represented in Brussels, contributing to a more balanced and fair EU decision-making process.

Finally, the findings stress the necessity for structural reforms within Croatia's public administration. These reforms are essential to foster a more active and transparent approach to EU affairs, so to enable both Croatian interest groups and citizens to engage more effectively in the EU legislative process. Such involvement is crucial for bridging the gap between EU institutions and the Croatian public, and for reducing the sense of distance that many citizens feel toward the EU. By enhancing these channels of participation, Croatia can strengthen its influence within the EU and ensure that its unique needs and perspectives are considered in the broader European context. This, in turn, would promote a more inclusive and participatory democracy, where the decisions made at the EU level truly reflect the diverse voices of all its member states, interest groups and – most of all – citizens.



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### **Interviews**

Interview 1 (2024) Semi-structured interview with a highly positioned, executive-level member at Croatian Artificial Intelligence Association. Zagreb: Conducted 22nd of August 2024.

Interview 2 (2024) Semi-structured interview with an executive-level individual and public affairs expert working at EuroNavigator. Zagreb: Conducted 27th of August 2024.

## Appendices

### Prilog 1: Protokol za intervjuiranje

#### Diplomski rad "The Anatomy of Engagement: Croatian Interest Groups and the EU Artificial Intelligence Act"

##### Protokol za intervjuiranje

- **Provoditelj intervjua:**
- **Intervjuirana osoba:**
- **Organizacija:**
- **Datum:**
- **Sat:**

##### Na početku:

- Istaknuti kako intervju traje od 45 do 60 minuta.
- Upoznavanje sudionika sa svrhom i ciljevima istraživanja
- Pojašnjenje da je intervju polustrukturiran, što znači da će 10 primarnih pitanja biti vodilja, uz mogućnost dodatnih potpitanja.
- Zatražiti dozvolu za snimanje (priložiti etičku izjavu).
- Izjava o tome da će se rezultati koristiti anonimno.
- Pitati osobu ima li početnih pitanja i naglasiti važnost dojma i mišljenja sugovornika. Naglasiti sudioniku/ici da nije problem ako ne bude imao uvid u sve teme koje se obrađuju, jer se cjeloviti uvid dobiva analizom svih prikupljenih odgovora.

## PITANJA

### Strategije angažmana

1. Koje strategije (i putem kojih kanala) je vaša organizacija koristila kako bi utjecala na Akt o umjetnoj inteligenciji EU-a?
2. Kako ste odlučili između pristupa lobiranja unutar i izvan institucija u vašim naporima da utječete na zakonodavstvo?
3. Možete li opisati napore u izgradnji koalicija? Jesu li te koalicije bile učinkovite u jačanju vašeg utjecaja na Akt o umjetnoj inteligenciji EU-a?
4. Kako je vrijeme vašeg angažmana (rano nasuprot kasnom u zakonodavnom procesu) utjecalo na vašu strategiju?

### **Doprinosi**

5. Koje konkretne doprinose je vaša organizacija dala tijekom zakonodavnog procesa Akta o umjetnoj inteligenciji?
6. Kako ste osigurali da zakonodavci uzmu u obzir vaše prijedloge?
7. Je li bilo posebnih izazova u priznavanju vaših doprinosa na razini EU-a?
8. Kako ste iskoristili tehničku stručnost da utječete na zakonodavni proces?

### **Percepcije učinkovitosti**

9. Koliko smatrate da je vaša organizacija bila učinkovita u oblikovanju Akta o umjetnoj inteligenciji EU-a?
10. Koji su čimbenici, prema vašem mišljenju, doprinijeli ili ometali vaš uspjeh, i biste li u budućnosti drugačije pristupili svom angažmanu?



## **Prilog 2: Etička izjava**

**Informirani pristanak i etička izjava za polustrukturirani ekspertni intervju**  
Istraživanje za potrebe pisanja diplomskog rada: “The Anatomy of Engagement: Croatian Interest Groups and the EU Artificial Intelligence Act”

Kontaktne informacije

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### **Sažetak istraživanja**

Cilj rada je istražiti i analizirati načine na koje su se hrvatske interesne skupine uključile u zakonodavni proces Europske unije vezan uz Akt o umjetnoj inteligenciji, te identificirati čimbenike koji su utjecali na izbor njihovih strategija i njihovu percipiranu učinkovitost. Istraživačko pitanje na koje se u radu nastoji odgovoriti je: Kako su se hrvatske interesne skupine uključile u zakonodavni proces EU Akta o umjetnoj inteligenciji i koji su čimbenici utjecali na odabir njihovih strategija i njihovu percipiranu učinkovitost?

Uz analizu dokumenata, metodološki oslonac rada bit će na intervjuima s ekspertima koji su direktno sudjelovali u procesu ili imaju detaljno znanje o temi. Intervjui će omogućiti prikupljanje kvalitativnih podataka koji će doprinijeti razumijevanju dinamike, izazova i postignuća hrvatskih interesnih skupina u kontekstu stvaranja EU regulative o umjetnoj inteligenciji.

Istraživanje za diplomski rad dizajnirao je i provodi Nikola Noršić pod mentorstvom prof. dr. sc. Igora Vidačka s Fakulteta političkih znanosti ([igor.vidacak@fpzg.hr](mailto:igor.vidacak@fpzg.hr)).

### **Opis intervjuja**

U intervjuu će se razgovarati o uključenosti i strategijama hrvatskih interesnih skupina u zakonodavnom procesu vezanom uz Akt o umjetnoj inteligenciji Europske unije. Razgovor će se posebno usmjeriti na konkretne strategije i pristupe koje su te skupine koristile kako bi

utjecale na donošenje odluka i zastupale interese relevantnih dionika. Intervjui će se provoditi u Hrvatskoj, pri čemu će se sudionike poticati na otvoren razgovor o temi, uz ciljano usmjeravanje prema ključnim aspektima istraživanja. U odgovaranju na pitanja, naglasak će biti stavljen na iskustva i stavove sudionika, kao i na njihovu percepciju učinkovitosti vlastitih strategija. Intervju se sastoji od 10 osnovnih pitanja koja se odnose na angažman u procesu donošenja Akta o umjetnoj inteligenciji.

Očekivano trajanje intervjua je od 45 do 60 minuta. Uz suglasnost sudionika intervju će, radi lakše obrade podataka, biti snimljen uz osiguranje povjerljivosti te uništenje snimke nakon njenog transkribiranja. Proces provedbe intervjua provodi se uz poštivanje istraživačkih etičkih standarda i povjerljivosti. Svi prikupljeni podaci će se transkribirati, a zatim pojedinačno kodirati s obzirom na to da će se intervjui provesti na malom broju aktera. Istraživanje, stoga, garantira povjerljivost jer se identitet sudionika neće navoditi prilikom iznošenja nalaza.

## **IZJAVA**

Ovo istraživanje provodi se za potrebe izrade diplomskog rada na temu „The Anatomy of Engagement: Croatian Interest Groups and the EU Artificial Intelligence Act” pod mentorstvom prof. dr. sc. Igora Vidačka. Iako je riječ o relevantnoj temi uloge interesnih skupina u zakonodavnom procesu vezanom uz Akt o umjetnoj inteligenciji Europske unije, malo je detaljnih istraživanja koja se bave načinom na koji interesne skupine manjih država članica, poput Hrvatske, nastoje utjecati na donošenje odluka Europske unije.

Sudjelovanje u intervjuima kao dio provedbe istraživanja je dobrovoljno, a povjerljivost podataka zagantirana. Uz pristanak sudionika/ce provedba intervjua se snima radi lakše obrade i analize podataka. Nakon intervjua, provoditelj će napraviti prijepis audio snimke (transkribiranje), a snimka će se uništiti nakon transkribiranja. Intervju će se s pripadajućim podacima sudionika kodirati te se sudionikovo ime i prezime neće koristiti u daljnjem tekstu, već samo sudioniku dodijeljen kod. Na taj način samo provoditelj intervjua zna da spomenute izjave i citati pripadaju baš tom sudioniku intervjua. Sudionik/ca ima pravo prekinuti sudjelovanje u istraživanju u bilo kojem trenutku.

Dostupni izvori informacija

Ukoliko imate dodatnih pitanja možete kontaktirati istraživača na sljedeću e-mail adresu: [norsicnikola@gmail.com](mailto:norsicnikola@gmail.com)

## Autorizacija

Pročitao/la sam i razumio/la ovaj informirani pristanak te pristajem sudjelovati u ovome istraživanju.

**Potpis istraživača:** \_\_\_\_\_

**Potpis sudionika/ce:** \_\_\_\_\_

**Mjesto i datum:** \_\_\_\_\_

Nikola M. Noršić

**The Anatomy of Engagement: Croatian Interest Groups and the EU Artificial Intelligence Act**

*Abstract*

This research examines the involvement of Croatian interest groups in the legislative process of the European Union's Artificial Intelligence Act. Through a mixed-methods approach that combines document analysis with expert interviews, the research highlights the proactive strategies employed by Croatian interest groups in shaping the AI Act, despite Croatia's limited influence and resources. The research underscores the importance of early-stage lobbying and coalition-building as important strategies for interest groups from smaller EU member states to influence EU policy outcomes. Furthermore, the research suggests that structural reforms within Croatian public administration are necessary to enhance the country's capacity for timely and effective participation in EU legislative processes, which should ultimately strengthen democratic engagement and reduce the alienation of Croatian citizens from EU institutions.

*Keywords:* Artificial Intelligence Act, Croatian interest groups, EU policymaking, CroAI, lobbying strategies