

When Institutions Speak through Machines: EU Public Communication and Generative AI in Post-Digital Europe – A Policy and Interview Analysis

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Abstract. This article examines how European Union (EU) public communication has evolved across successive waves of digital transformation, with particular attention to the emerging impact of generative artificial intelligence. By conceptualising communication as a constitutive dimension of governance rather than a purely instrumental activity, the study analyses how institutional voice, legitimacy and meaning-making are reshaped within increasingly datafied and algorithmically mediated environments. The research adopts a qualitative, interpretive design grounded in a constructivist epistemology. Empirically, it combines a longitudinal analysis of 85 EU institutional policy documents published between 1990 and 2025 with 30 expert semi-structured interviews conducted with EU officials, communication practitioners, journalists, and academic experts. Through a hybrid deductive–inductive thematic analysis, the article develops a socio-technical periodisation of EU’s public communication across three phases: pre-digital, digital, and post-digital. The findings show that while the digital phase expanded participation and data-driven practices, the post-digital phase marks a qualitative shift in which digital infrastructures and generative AI become constitutive of institutional communication itself. Generative AI introduces hybrid human–machine agency, reconfiguring authorship, accountability, and epistemic authority. The study concludes that EU’s public communication is increasingly an infrastructural governance responsibility, requiring new organisational capacities and normative safeguards to sustain legitimacy in computational public spheres.

Keywords: artificial intelligence; digital transformation; European Union; post-digital; public communication.

Kai institucijos kalba per mašinas: ES viešoji komunikacija ir generatyvinis dirbtinis intelektas postskaitmeninėje Europoje – politikos ir interviu analizė

Straipsnyje nagrinėjama, kaip Europos Sąjungos (ES) viešoji komunikacija kito per vėlesnes skaitmeninės transformacijos bangas, ypatingą dėmesį skiriant generatyvinio dirbtinio intelekto (DI) poveikiui. Laikydama komunikaciją ne grynai instrumentine veikla, o valdymo sudedamąja dalimi, ši studija analizuoja, kaip institucinis balsas, teisėtumas ir prasmės kūrimas keičiasi vis labiau duomenimis pagrįstose ir algoritmiškai tarpininkaujamose aplinkose. Tyrime taikomas kokybinis, interpretacinis metodas, grindžiamas konstruktyvistine epistemologija. Empiriškai jis derina 85 ES institucinių politikos dokumentų, paskelbtų nuo 1990 iki

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2025 m., ilgalaikę analizę su 30 pusiau struktūruotų ekspertų interviu, atliktų su ES pareigūnais, komunikacijos specialistais, žurnalistais ir akademiniais ekspertais. Naudodamas mišrią dedukcinę-indukcinę teminę analizę, straipsnyje autorius pateikia ES viešosios komunikacijos sociotechninę periodizaciją, suskirstydamas ją į tris etapus: ikidigitalinį, skaitmeninį ir postdigitalinį. Tyrimo rezultatai rodo, kad nors skaitmeninis etapas paskatino aktyvesnį dalyvavimą ir duomenimis grindžiamą veiklą, postskaitmeninis etapas žymi kokybinį poslinkį, kai skaitmeninės infrastruktūros ir generatyvinis DI tampa pačios institucinės komunikacijos sudedamąja dalimi. Generatyvinis DI įveda hibridinį žmogaus ir mašinos veikimą, iš naujo apibrėždamas autorystę, atskaitingumą ir episteminį autoritetą. Tyrime daroma išvada, kad ES viešoji komunikacija vis labiau tampa infrastruktūrinio valdymo atsakomybe, reikalaujančia naujų organizacinių gebėjimų ir normatyvinių apsaugos priemonių, siekiant išlaikyti teisėtumą kompiuterinėse viešosiose erdvėse.

Pagrindiniai žodžiai: dirbtinis intelektas; skaitmeninė transformacija; Europos Sąjunga; postskaitmeninis; viešoji komunikacija.

Introduction

Over the past two decades, the accelerating penetration of digital technologies – and, more recently, the rise of generative artificial intelligence (AI) – has transformed the infrastructures through which public institutions construct meaning, legitimacy and interaction with citizens (Lovari & De Rosa, 2025; Pane, 2025b). European public communication refers here to the ensemble of communicative practices, organisational arrangements and socio-technical infrastructures through which European Union (EU) institutions articulate policy rationales, justify political authority and structure relations with citizens and stakeholders across a multilevel governance system (Lovari & Belluati, 2023).

It encompasses the production and dissemination of information by formal communication units as well as the discursive, symbolic and procedural processes through which institutional voice is constituted, mediated and contested across heterogeneous public arenas (Belluati, 2021). EU's public communication is therefore not reducible to strategic messaging or public relations activities (Valentini, 2019; Verčič & van Ruler, 2005). Rather, it functions as a constitutive dimension of governance, through which institutional authority is rendered intelligible and legitimate within a fragmented, platform-mediated European public sphere increasingly co-authored by computational systems (Pane, 2025a).

Within this framework, digital technologies no longer function as external instruments but, instead, as constitutive elements of the epistemic and organisational processes through which institutional information is produced, authorised and rendered meaningful – which is a shift that remains insufficiently theorised. Two interrelated gaps persist in the literature: a lack of systematic reconstruction of EU's public communication across its full socio-technical trajectory and analytically underdeveloped scholarly reflection on AI integration into EU's communicative practices, despite intensifying institutional experimentation. The currently existing research has largely concentrated on national administrations and service delivery, while obscuring the distinct communicative role of EU institutions as producers of transnational political meaning and legitimacy.

In undertaking to address these gaps, this article offers a systematic socio-technical periodisation of EU's institutional communication across three phases – pre-digital, digital

and post-digital – derived from policy documents (1990–2025) and expert interviews. It develops an original institutional conceptualisation of post-digitality as a mode of communicative governance in which digital infrastructures and generative AI become constitutive of institutional meaning-making, situating this condition as an institutional practice rather than solely a theoretical construct.

Background

Public communication as a strategic activity of legitimacy-building

Communication constitutes a fundamental mechanism through which public institutions construct, negotiate and sustain their legitimacy vis-à-vis citizens, articulating policy rationales, justifying decisions, cultivating identification and enacting the symbolic structures through which political authority is recognised and reproduced (Bobba, 2021; Lovari & Belluati, 2023). This constitutive role is particularly pronounced in the EU's multilevel governance system, where legitimacy hinges on the capacity to coordinate meanings and render collective action intelligible across a fragmented communicative space.

This configuration is the outcome of a longer historical process marked by a critical juncture: the shift from permissive consensus to constraining dissensus (Hooghe & Marks, 2009; Lindberg & Scheingold, 1970). In the early decades of European integration, legitimacy rested on elite mediation and technocratic problem-solving rather than on deliberative engagement: citizens largely delegated political vision to institutional actors whose authority derived from output effectiveness and policy performance (Lindberg & Scheingold, 1970). As integration deepened and politicisation intensified, this model eroded. The emergence of constraining dissensus – amplified by successive crises and heightened public scrutiny – exposed the fragility of a performance-based legitimacy model (Hooghe & Marks, 2009), prompting communication to be reconceptualised as a strategic resource for legitimacy-building, mediation and relationship construction between EU institutions and citizens.

Strategic communication encompasses a spectrum of organisational activities shaping perceptions, cultivating relationships and supporting institutional objectives, from administrative coordination to public relations and social marketing. Beyond visibility, it valorises feedback mechanisms – i.e., the processes through which the receivers' responses inform subsequent communication – embedded at the EU level in iterative policy cycles of monitoring, evaluation and review (OECD, 2025; Schramm, 1954). This positions EU's public communication as a form of meta-policy: a transversal governance infrastructure structuring the conditions under which institutional legitimacy is constructed and maintained, rather than a support function for individual policies.

This article follows Lovari and Belluati's (2023) conceptualisation of the EU's public communication as a multi-level, multi-actor ecosystem centred on the institutional triangle – which is constituted of the European Commission, the European Parliament, and the Council – through which, strategic orientations, policy priorities and discursive

frameworks are formulated, negotiated and operationalised. EU agencies, national administrations, media organisations, civil society actors and digital platforms operate as intermediaries, mediating institutional messages across governance levels in differentiated and partly subordinated positions. European public communication performs simultaneously relational and informational functions, generating trust and intelligibility – which are essential conditions for sustaining institutional legitimacy (Smillie & Scharfbillig, 2024). Digital platforms and algorithmic intermediaries have profoundly reshaped this architecture, redistributing communicative power and reconfiguring the conditions, under which, institutional communication is produced, circulated, and received. They have expanded outreach through many-to-many dynamics, enabling more interactive and participatory forms of engagement, while intensifying message fragmentation, coordination deficits and risks of distortion (Castells, 1996; Papacharissi, 2015).

Digital transformation and the datafication of European public institutional communication

Digital transformation – which is understood as the cumulative outcome of digitisation and digitalisation – has profoundly reconfigured the communicative architecture of contemporary governance, including that of European institutions (D’Ambrosi, 2019). From static Web 1.0 environments in the 1990s, exemplified by the Europa Server (1995), to the participatory Web 2.0 of the early 2000s with its expanding social media presence and e-participation platforms – institutionally governed digital tools enabling citizens to engage in consultation, deliberation and feedback processes linked to public decision-making – EU’s public communication has undergone gradual functional reorientation (Antonucci & Volterrani, 2022). The subsequent transition to semantic, interoperable Web 3.0 applications deepened this shift through data interoperability, machine-readable information and algorithmic mediation (Hitzler, 2021), commonly described as the datafication of communication: the growing reliance on data, metrics and algorithmically mediated feedback to inform communicative strategies and evaluate performance (OECD, 2019; 2021), progressively displacing one-to-many models in favour of many-to-many dynamics within highly competitive and fragmented environments.

These dynamics have generated significant structural challenges. Attention has become the key currency of digital communication, and yet its allocation is governed by platform capitalism’s logics of data extraction, algorithmic ranking and targeted advertising, subordinating public communication to commercial infrastructures oriented toward attention maximisation rather than democratic deliberation – a tension that is particularly salient in Europe given its reliance on platforms predominantly operated by US-based companies, reinforcing concerns over digital sovereignty (Gillespie, 2018; Van Dijck et al., 2018; Zuboff, 2019).

Algorithmic systems that privilege engagement over accuracy amplify disinformation risks, reflected in narratives portraying the EU as technocratic or illegitimate, and in foreign information manipulation campaigns – most notably, Russian-sponsored – targeting EU

legitimacy, prompting the European External Action Service to launch *EUvsDisinfo* in 2015 (Sampugnaro & Trenz, 2024). Persistent digital divides spanning physical to cognitive access barriers compound these challenges as a structural feature of platform societies (Van Dijk, 2008; 2017). In response, the *Digital Services Act* (DSA) and the *Digital Markets Act* (DMA) – issued in 2022 – represent explicit attempts to reassert democratic oversight over digital infrastructures mediating political visibility, foregrounding regulation as both a communicative and governance response to platformisation.

Despite growing institutional experimentation, the integration of generative AI into EU's public communication remains largely underexplored. The following sections address this gap by examining how AI is reshaping EU's communicative practices and its implications for institutional communication, governance, and democratic accountability.

Methodology

This study addresses the two following interrelated research questions:

RQ1. *How has EU's public communication evolved across successive waves of digital transformation and how have these waves reshaped its actors, organisational structures and communicative functions?*

RQ2. *How is the introduction of AI, particularly in its generative forms, transforming EU's public institutional communication, and with what implications for communicative practices, governance arrangements and democratic accountability?*

To address these questions, the research adopts a qualitative and interpretive design grounded in constructivist epistemology (Corbetta, 2003). Institutions are conceptualised not merely as administrative structures, but, rather, as symbolic and cognitive environments in which meaning, authority and communicative practices are continuously produced, negotiated and contested. Accordingly, the methodological approach privileges analytical depth, contextual sensitivity and the reconstruction of interpretive logics, rather than criteria of replicability typically associated with positivist research traditions.

The empirical strategy integrates two complementary corpora: (1) a longitudinal analysis of EU's institutional documents, and (2) expert semi-structured interviews with actors involved in European public institutional communication. The document corpus comprises 85 EU's institutional texts produced between 1990 and 2025¹. The documents were retrieved through systematic keyword searches combining *communication* with terms identified as theoretically relevant through the literature review, namely: (a) information, (b) participation, (c) European public sphere, (d) digital transformation, and (e) AI. Searches were conducted across the *Publications Office of the EU*, *EUR-Lex*, and

¹ Although the initial keyword search extended to earlier phases of European integration, no documents produced prior to 1990 were found to meet the analytical criteria for examining public institutional communication in relation to processes of digital transformation. The corpus, therefore, begins with documents issued in 1990, corresponding to the earliest retrieved document that enabled the operationalisation of this analytical perspective, and extends to September 2025, when data collection and analysis were concluded.

the *Europa Server*. Inclusion was restricted to authoritative institutional sources – such as communications, joint communications, action plans, green and white papers, regulations, directives and key soft-law instruments – on the grounds that these texts articulate the conceptual, normative and infrastructural frameworks, through which, the EU constructs and legitimises its communicative role.

The second empirical component consists of 30 expert semi-structured interviews conducted between May 2024 and January 2025. A purposive sampling strategy was employed with the objective to capture interpretive diversity across organisational roles and institutional settings within EU's public institutional communication. While anonymity requirements preclude the disclosure of individual affiliations, the sample includes senior officials working in Directorate-General communication units, policy officers involved in AI and digital governance, strategic communication practitioners within the European Commission and the European Parliament, officials operating at the EU level but based in member states, representatives of EU agencies responsible for information integrity and external observers such as Brussels-based journalists and academic experts. Interviews were conducted by using a semi-structured interview guide (see Appendix 1).

It was organised around the same set of analytically grounded keywords that guided the construction of the policy corpus, ensuring internal coherence across empirical components. The interviews were carried out in English, French and Italian, according to specific participants' linguistic preferences, and continued until thematic saturation was reached, defined as the point at which additional interviews no longer generated new conceptual categories or interpretive insights relevant to the analytical framework. All participants provided verbal informed consent prior to participation. The interviews were transcribed verbatim and pseudonymised.

The analysis followed a manual thematic content analysis consistent with interpretive qualitative inquiry, adopting a hybrid deductive–inductive coding strategy. Coding proceeded iteratively. Deductive categories derived from the theoretical framework – such as *communicating to inform* and *communicating to engage*, referring to the functions of EU's communication and its multilevel and multi-stakeholder orientation – served as initial sensitising concepts. These categories were subsequently refined inductively through close reading of the materials in order to capture the emergent themes, discursive inflections and tacit assumptions expressed by the participants or embedded in policy texts. Inductively generated codes included themes such the *hybridisation of online and offline communication* and the *human-centric resistance to AI*.

Manual analysis was adopted because automated tools struggle with semantic and contextual ambiguity, particularly when concepts are used heterogeneously across documents (Anastasiu & Georgescu, 2020). Given the context-dependent nature of the key terms driving the study, manual coding was necessary to ensure analytical validity. On the basis of the interpretive and constructivist orientation of the study, intercoder reliability procedures were not employed, since this work is aimed at reconstructing meaning rather than quantifying agreement (Schwartz-Shea & Yanow, 2013).

To address interpretive risks, analytical rigour was instead ensured through recursive coding cycles, systematic memo-writing and collaborative discussions within the research team. These discussions were oriented toward the collective refinement of analytical categories rather than statistical convergence, in line with validated qualitative research protocols in the social sciences (Saldaña, 2021). Since coding is constructed and therefore non-neutral, reflexivity was treated as an integral part of the analytical process (Saldaña, 2021). Following Malaurent and Avison's (2017) tripartite framework, this study focused on self-reflexivity, by using a reflexive journal serving to document analytical decisions, theoretical assumptions and positional considerations, as well as to monitor interview saturation.

The integration of documentary and interview data followed a comparative interpretive logic. Policy documents provided a longitudinal perspective on the evolution of EU's communication strategies across successive phases of digital transformation. Interview narratives, in turn, illuminated the interpretive meanings underlying these policy texts and enabled the exploration of issues that are only marginally addressed in – or entirely absent from – official documents, such as the introduction of AI into EU's public institutional communication.

Findings and discussion

The findings integrate insights from longitudinal documentary analysis and interviews, which are examined jointly in line with the study's interpretive orientation, treating empirical material and conceptual interpretation as mutually constitutive (Schwartz-Shea & Yanow, 2013). The three-phase periodisation derived from policy documents – i.e., pre-digital, digital and post-digital – provides the analytical structure for examining the evolution of EU's public institutional communication, while interview narratives contribute original insider perspectives that illuminate how policy orientations are interpreted, operationalised and contested in practice (Table 1).

Table 1. **Periodisation of European public communication across successive phases of digital transformation**

Phase	Period	Infrastructure	Defining features
Pre-digital	1951–2006	Analogue media and early static web experimentation	Vertical and unidirectional communication flows; technocratic/expert publics; technical-policy register; analogue; static early web (non-interactive tools)
Digital	2006–2020	Institutionalisation of digital platforms and participatory web infrastructures (e.g., social media, e-participation platforms)	Strategic communication turn; platformisation; networked bidirectionality; citizen participation; techno-optimism; incipient platform regulation/disinformation response

Phase	Period	Infrastructure	Defining features
Post-digital	2020–present	Consolidation of platform infrastructures and experimentation with conversational AI-based systems	Automated communication; hybrid agency and co-production of communication (human/machine); conversational continuity; authorship and epistemic ambiguity; accountability and legitimacy challenges; anticipatory techno-critical regulation

Source: own elaboration

The pre-digital phase (1951–2006)

The pre-digital label designates a phase in which European public communication relied on predominantly analogue infrastructures and practices, with digital technologies either absent or marginal to communicative processes (Harrison & Pukallus, 2015). Communication practices were developed within an environment structured by analogue media, paper-based procedures and hierarchical channels, prior to the emergence of digital platforms, data-driven systems or online interaction. At the same time, defining this phase as pre-digital does not imply a lack of institutional awareness of digital developments. When digital technologies began to diffuse in Europe, EU’s institutions showed early interest in their communicative potential, as illustrated by initiatives such as the launch of the *Europa Server* in the mid-1990s, as mentioned in the background section. However, this experimentation remained limited and functionally weak: digital tools were conceived as static and non-interactive supports to the concurrently existing practices, and did not substantially alter the hierarchical, one-directional and technocratically oriented communication model.

During this phase, EU’s public communication was grounded in technocratic functionalism; it was oriented primarily toward expert communities, including national elites and key stakeholders involved in sustaining the integration process. Language was predominantly technical and policy-oriented, while citizens were only indirectly addressed (Radaelli, 1999). From the establishment of the European Coal and Steel Community in 1951 through the 1980s, communication fulfilled administrative, informational and diplomatic functions and “served to showcase the presence of a new political entity, the European Union, as a means of gaining visibility across largely nationalised public opinions” (P24). The interviewees consistently described this period as one in which institutions “spoke inward and upward” (P14), while noting that the early EU’s communication was “fundamentally different from contemporary practice” (P25).

As constraining dissensus spread and as politicisation intensified during the Maastricht debates of the early 1990s, which was followed by contestation over the common currency, public support for integration could no longer be assumed. This trajectory culminated in the failed referenda on the Constitutional Treaty in France and the Netherlands in the early 2000s, which exposed the limits of an integration process not supported by a sufficiently robust public communication and engagement strategy. The referenda revealed

a growing disjunction between institutional integration and citizens' understanding and consent, highlighting the structural weakness of EU's public communication.

Insider accounts reinforce this interpretation. As one interviewee recalled, "(...) a preparatory dossier was submitted calling for the inclusion of a dedicated chapter on public communication within the Constitutional Treaty although, for reasons of timing, it was ultimately not possible to include it. (...) This nevertheless indicates the effort and the intention to valorise communication as a strategic instrument of governance" (P25).

Although the proposal was not adopted, it demonstrates that communication had already been identified as a condition of legitimacy, with the referenda crystallising the gap between this awareness and existing communicative capacities. In response, EU institutions gradually began opening toward citizens, moving – albeit slowly – from vertical to more bidirectional communication flows, as reflected in policy initiatives such as the PRINCE programme (*Priority Information Actions for the European Citizen*, 1995) and the *White Paper on European Governance* (2001). Despite their ambition, these strategies continued to relegate digital tools to a secondary role (D'Ambrosi, 2019).

The digital phase (2006–2020)

A decisive turning point occurred with the adoption of the *White Paper on a European Communication Policy* (2006), widely regarded as the foundational milestone that established European public communication as a strategic lever of integration. From this moment onward, social media and e-participation platforms progressively consolidated as core infrastructures of European public communication, reframing the relationship between communication and digital technologies within institutional thinking. Digital tools were thus mobilised to address the structural shortcomings of the integration process, to counter perceived communication deficits at the European level, and strengthen connections with citizens (Belluati, 2021).

The digital turn enabled EU's communication to move "from monologue to networked communication" (P09). As one interviewee observed, communication became markedly more "citizen-oriented and user-friendly in language and style" characterised by more accessible, dialogic and responsive approaches (P01). Strategic initiatives such as the *Digital Agenda for Europe* (2010; updated in 2015) reinforced this shift by positioning citizens as users and co-creators, within increasingly distributed and platform-mediated information ecosystems. As a flagship initiative of the *Europe 2020* strategy, the *Digital Agenda* articulated the EU's vision of digital transformation as an opportunity, framing digital technologies through institutional narratives characterised by strong techno-optimism and their presumed capacity to empower citizens.

Aligning with the theoretical trajectory discussed above, this phase was nevertheless followed, from the mid-2010s onward, by a "wake-up call" (P17). Growing awareness of the risks associated with platform-mediated communication – particularly, the spread of disinformation – prompted stronger institutional intervention and the development of a dedicated policy agenda aimed at safeguarding the integrity of European public com-

munication. Key milestones in this shift include the Commission’s *Action Plan against Disinformation* (2018), the adoption of the *Code of Practice on Disinformation* in 2018 (subsequently strengthened in 2022) and the establishment of the *European Digital Media Observatory* (EDMO) as part of this coordinated response.

The post-digital phase (2020–present)

The year 2020 constitutes an analytical threshold because the COVID-19 crisis exposed the structural limits of EU’s public communication up to that point, while simultaneously accelerating the infrastructural dependence on digital platforms, the operational uptake of AI, and the shift toward anticipatory regulation. The recent development of AI, together with its rapid expansion and experimentation within EU institutions, has enabled a transformation of sufficient magnitude to inaugurate a new phase in European public communication. The *post-digital* label refers to this shift: the infrastructural absorption of digitality into the environment of institutional communication, in which, meaning-making is increasingly co-authored by human actors and computational systems (Pane et al., 2025). Unlike the digital phase, where technologies primarily functioned as external tools, the post-digital era is characterised by systems that display quasi-human communicative features – most notably, conversational capacities – as in the case of generative AI. EU institutions are currently experimenting with such systems, including chatbots, for both internal and external communication purposes (Pane, 2025b). In this sense, a participant highlighted that “chatbots are becoming more common in the public sector because of AI and I think they’re clearly an opportunity to innovate communication practices, even if we’re still figuring out how to use them properly” (P04).

These tools enable the automation of repetitive tasks while supporting multilingual and continuous (24/7) interaction, a strategically significant development insofar as it has the potential to reduce communicative distance between institutions and citizens (Pane, 2025b). At the same time, persistent challenges remain (Lovari & De Rosa, 2025). These include infrastructural limitations, the adequacy of existing technical systems and issues of interoperability – understood as the capacity of different digital systems, databases and platforms to communicate, exchange data and operate coherently across institutional and organisational boundaries. Additional challenges concern the skills and competencies required of public communicators to manage AI-supported communication effectively, as well as ethical issues related to the processing of sensitive data, the transparency of automated systems and the protection of citizens’ rights within AI-mediated communicative environments. The interviewees consistently described these principles as essential for navigating an order in which communicative agency is increasingly distributed across computational infrastructures. This was reflected, for instance, in one interviewee’s remark that AI crystallises this shift. Unlike earlier digital tools, generative systems intervene directly in authorship, interpretation and dissemination, transforming communication into a hybrid practice involving both human and machine actors. Research on algorithmic agency shows that probabilistic outputs introduce epistemic uncertainty and destabilise

established norms of neutrality, traceability and reliability (McIntyre et al., 2025). The interviewees confirmed the emergence of *hybrid agency*, noting that, for instance, “drafting tools, classifiers and chat interfaces shape how ideas are formulated and how quickly they circulate” (P13).

Hybrid agency generates new dilemmas of responsibility and accountability. As one interviewee observed, institutions are still determining “who is responsible for AI-supported communication” (P22). Questions of provenance, validation and contestability become particularly acute as machine-generated and human-generated content converges (Gehman et al., 2025). The notion of *artificial sociality* captures how generative systems simulate relational presence, further blurring the boundaries between human and machine authorship (Natale & Depounti, 2024). In this perspective, the safeguards embedded in the *Artificial Intelligence Act* (AI Act, 2024) – notably, transparency, explainability, traceability and contestability – represent institutional attempts to re-anchor communicative legitimacy within hybrid environments. One participant pointed out that “regulation is needed to make AI function in support of people (...) rather than replacing them” (P22).

More broadly, however, AI should be understood as a defining – but not exclusive – feature of the post-digital phase. The decision to locate the onset of the post-digital phase in the early 2020s reflects the presence of a broader set of structural transformations and foregrounds a key analytical claim advanced in this article: transitions between phases are smooth rather than rigid. Regulatory approaches to digital platforms, which emerged during the digital phase, continue and intensify in the post-digital phase, where regulation assumes a central analytical function. This shift is reflected in the adoption of the DSA and the DMA (2022), alongside the AI Act (2024). Together, these frameworks signal a move away from earlier forms of techno-optimism toward more explicit modes of techno-criticism, in which the limits and risks of platforms and digital tools are openly acknowledged. Increasingly anticipatory regulation both constrains technological power and re-centres citizens within the innovation paradigm, while safeguarding human oversight as a core principle of governance.

Conclusions

This article has examined the transformation of EU’s public communication across successive waves of digital transformation and the emergence of generative AI, with the aim of clarifying how communicative governance is being reconfigured in the post-digital era, drawing on EU’s policy documents (1990–2025) and expert interviews. With regard to RQ1, the study shows that EU’s public communication has evolved through a historically continuous process marked by clear analytical shifts.

In its pre-digital configuration, institutions communicated primarily inwardly toward elites, which was a structural limitation that became evident with the failed Constitutional Treaty referenda. The subsequent digital phase introduced more citizen-oriented and dialogic practices, before a regulatory turn redirected institutional attention toward information integrity. This evolution leads to a post-digital condition in which digital in-

frastructures and generative AI are no longer external supports, but constitutive elements of institutional meaning-making.

Transitions between phases are smooth rather than rigid, with the DSA, DMA and AI Act (2022; 2024) signalling a structural shift from techno-optimism toward techno-criticism, while persistent communicative deficits remain only partially resolved. With regard to RQ2, interviews confirmed the emergence of hybrid agency – drafting tools, classifiers and conversational interfaces actively shaping how institutional ideas are formulated and circulated – generating concrete organisational capacities in multilingual reach, task automation and communicative continuity, while simultaneously leaving questions of responsibility for AI-supported communication institutionally unsettled.

Legitimacy in this context depends increasingly on the transparency, traceability and contestability of algorithmic operations, as codified in the AI Act. Conjointly, these findings confirm that EU's public communication has become an infrastructural responsibility of governance, contributing to scholarship through an empirically grounded 35-year periodisation, a conceptualisation of generative AI as a driver of deeper institutional reconfiguration and the framing of EU's communication units as emerging sites of algorithmic governance at the intersection of communication studies, AI governance and democratic theory. From an institutional perspective, the findings highlight the need to balance technological catch-up with the development of trustworthy, human-centred AI tools. While institutions face pressure to adopt emerging technologies, AI should function as a support for human agency within ongoing socio-technical transformation. Future research should focus on citizens' reception of AI-mediated institutional communication, extend the framework through comparative analysis beyond the EU and develop longitudinal studies tracking the evolution of hybrid agency as generative systems move from experimentation to embedded practice. Further work is also needed on agentic AI systems, whose increasing autonomy and reduced human oversight are not yet fully anticipated by the current post-digital framework.

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