China's Strategy for Global AI Governance

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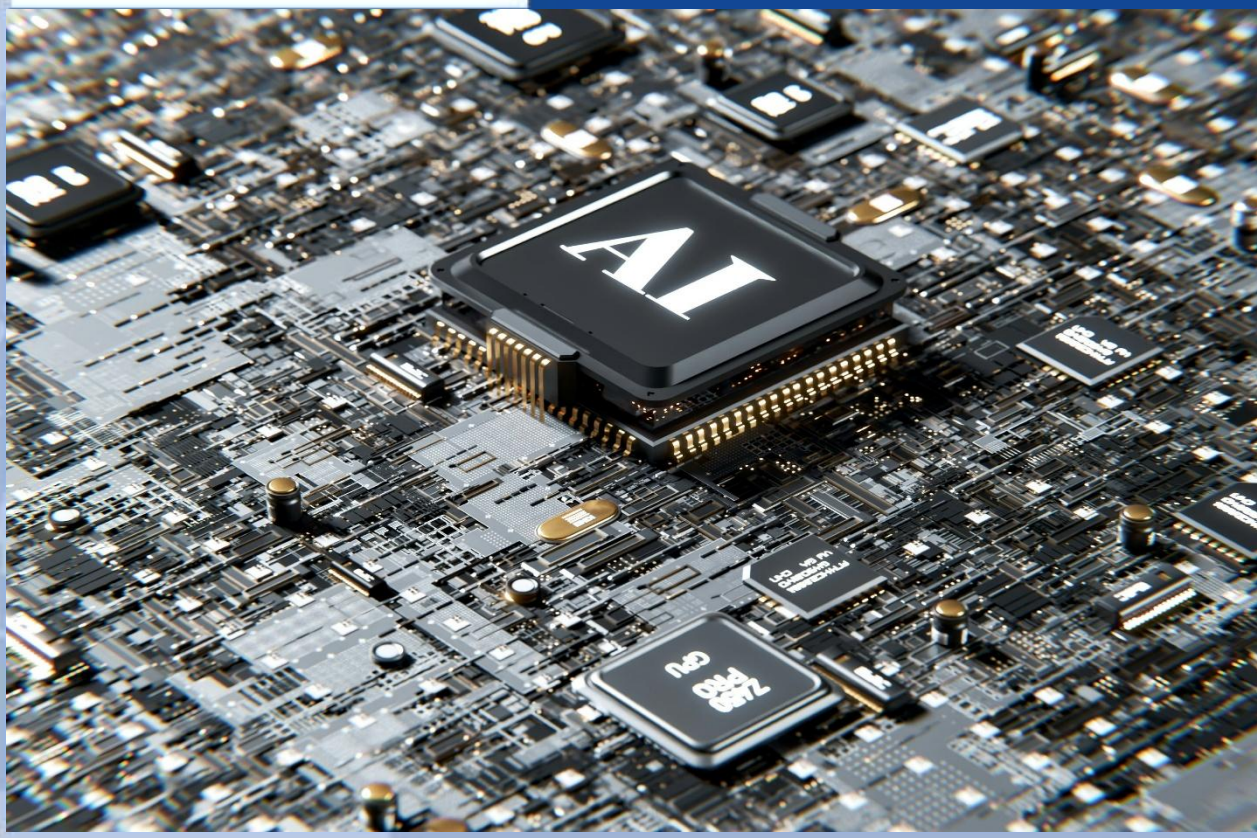

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Contents

Introduction

When OpenAI released ChatGPT in November 2022, the impact and practical applications of artificial intelligence (AI)—particularly Large Language Models (LLMs)—became significantly more tangible through its widespread success. More recently, the development of open-source LLMs by DeepSeek, a Chinese AI startup founded in 2023, has sparked renewed enthusiasm about the future of AI, as its models rival those from leading U.S. companies like OpenAI. Despite this excitement, AI remains a notoriously ambiguous concept, even as its significance and potential impact become increasingly evident to a wide range of stakeholders. As a result, policymakers around the world are racing to leverage AI's advantages while seeking to regulate its potential risks. Given AI's transnational nature and the competitive dynamics surrounding it, effective governance will require substantial international coordination. As one of the most prominent players in AI, China is both expected and determined to take a leading role in shaping this emerging field of governance. This report provides insights into China's approach to AI regulation and its perspective on global AI governance, equipping foreign policymakers with a clearer understanding of China's actions and intentions in this evolving regulatory landscape.

This report contains three sections. First, we set out the most relevant policy efforts on AI governance in China and characterise its key features. Particular attention will be paid to the ways in which national and international policy goals mutually shape each other. Second, we give an overview of the important actors within China that make and influence AI policy, the tools available to them to achieve these goals, and some of the processes and channels through which they engage in dialogue with each other. Third, we examine China's involvement in ongoing multilateral processes on AI, such as through the United Nations (UN) and various international organisations that represent Global South countries. We conclude the report with recommendations for European policymakers, and argue that 1) China's international behaviour should be understood in relation to its ambitious domestic goals and its national policy logic of "prudent but accommodative"; 2) China's international AI policy reflects both its ambition to shape global AI governance in ways that support its technological development and its concern over potential isolation from the global economic and technological landscape; 3) despite influence from the national government, China's AI

development and policymaking landscape is highly contested and involves a variety of actors; 4) the diverse AI applications and Chinese efforts provide opportunities for business engagement and strategic dialogue with China; and 5) China's focus will likely continue to shift towards the Global South for collaborations and business opportunities, which demands a further investigation and consideration of Global South perspectives.

1. China's Approach to Global AI Governance

1.1 Policy Goals

Expectations and hope among elites in China about what AI will mean for the country's future trajectory are high. The Chinese government regards the AI-powered digital revolution as "a major historical opportunity for the great rejuvenation of the Chinese nation".[1] A core component of rejuvenation centres on the idea of restoring strength and wealth to China under CCP leadership.[2] To achieve this goal, technological advancement for economic growth, strategic interests and other social goods has been consistently identified as a priority in policy. For instance, the 14th Five-Year Plan (2021-2025) for National Economic and Social Development and Vision 2035 identifies AI as a key digital technology and industry necessary for "building China's strength in cyberspace, accelerating the development of a digital economy, a digital society, and a digital government, and transforming the pattern of production, lifestyle, and governance models through digital transformation".[3] As a result, a main prong of China's AI policy is to drive industry *development* by leveraging its vast data resources and large-scale market applications, positioning itself as a global leader in AI.[4]

A secondary prong in Chinese AI policy is a concern for *safety*. As the government has become well aware of the risks that AI is already causing and will continue to bring about, officials have put regulation of the harms high on the agenda since 2017. As an authoritative source of general policy directions, the CCP's central leader Xi Jinping's speeches provide a valuable starting point, even though he is not directly involved in functional, day-to-day policymaking.

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[1] Central Office of Internet Information Technology. An Introduction to General Secretary Xi Jinping's Important Thoughts on a Stronger State on the Internet, People's Publishing House 2023, p. 40.) Quote found in Feng S., et al. (15 May 2024). Global AI governance: pluralistic processes and Competing Pictures. [全球人工智能治理：多元化进程与竞争性图景]

[2] Communist Party Member Network.
Retrieved from: https://www.12371.cn/special/xjpzyls/zgmls/

[3] National Development and Reform Commission. (13 March 2021). 14th Five-Year Plan (2021-2025) for National Economic and Social Development and Vision 2035 Part V. [中华人民共和国国民经济和社会发展第十四个五年规划和2035年远景目标纲要]. Retrieved from: https://www.ndrc.gov.cn/xxgk/zcfb/ghwb/202103/t20210323_1270124.html

[4] Qiu, L. (31 October, 2018). Xi Jinping: Promoting the healthy development of my country's new generation of artificial intelligence. [习近平：推动我国新一代人工智能健康发展]. Xinhua News. Retrieved from: http://www.xinhuanet.com/politics/2018-10/31/c_1123643321.htm

In his 2018 speech at the CCP Politburo, for example, Xi stated that China "should strengthen the research and prevention of potential risks in the development of artificial intelligence, safeguard the interests of the people and national security, and ensure that artificial intelligence is safe, reliable and controllable".[5] To achieve this, Xi points to the integration of multidisciplinary forces, the strengthening of research on legal, ethical and social issues related to AI, and the establishment and improvement of laws, regulations, systems and ethics to ensure the "healthy development of AI".[6] Xi here already alludes to the relationship between development and security, specifically that they are not inimical to one another but rather cannot exist without each other. As Xi put it in his 2015 speech at the second World Internet Conference: "Security is the guarantee of development, and development is the purpose of security". Xi uses the term *anquan* (安全), which covers both "safety" and "security" as used in European discussions. Therefore, "security" in this context is not limited to the proper functioning of the technologies or security of individuals using or affected by AI, but also includes considerations such as national security.[7]

In short, we can characterise China's approach to AI governance as "prudent but accommodative".[8] Economic development is a clear priority, but safety measures are necessary for a variety of reasons, including preventing technology misuse, reducing biases, and safeguarding social stability. Former Premier Li Keqiang, speaking at the 2018 World Economic Forum Annual Meeting of the New Champions—a gathering focused on innovative, high-growth companies and emerging economies—commented on the government's supportive approach to these sectors. He stated that such initiatives should be given room to grow, as long as they do not violate existing laws and regulations or conflict with key interests, particularly national security and the public good.[9] Li emphasised that the government wants to avoid "imposing a regulatory straitjacket right away" and will

[5] Ibid.
[6] Ibid.
[7] Yang, T. (27 February, 2014). Xi Jinping: Building my country from a cyber great power to a cyber superpower. [习近平:把我国从网络大国建设成为网络强国]. Xinhua News. Retrieved from: http://www.xinhuanet.com//politics/2014-02/27/c_119538788.htm
[8] Qiao-Franco, G., & Zhu, R. (2024). China's artificial intelligence ethics: policy development in an emergent community of practice. *Journal of Contemporary China*, 33(146), 189-205.
[9] Li Keqiang's speech at the opening ceremony of the 12th Summer Davos Forum. [李克强在第十二届夏季达沃斯论坛开幕式上的致辞]. (19 September 2018). Retrieved from: https://www.gov.cn/guowuyuan/2018-09/19/content_5323722.htm

encourage the new developments as long as they remain within the proper boundaries.[10] Chinese scholars have identified a number of factors relevant to this effort, which will need to be sorted out further by the government. For example, the relationship between AI legislation and other laws would have to be coordinated, and more attention would have to be given to the issue of how exactly to balance safety concerns with development.[11]

The national goals described above are closely connected to the goals China is pursuing on the international stage. First, China must ensure it has the necessary resources to achieve its ambitious AI development goals. Access to computing power, particularly to high-end chips, have been hampered by Western countries, mainly the US. [12] In 2015, the US banned Intel and other American chip giants from exporting their high-end chips, processors and other parts to China's supercomputing labs. China has since continually faced this challenge, most recently in the ASML dispute, where the Dutch government, under pressure from the US, restricted ASML's export of chip-making equipment to China, citing concerns over potential irresponsible or unethical use that could threaten national security or human rights.[13] Moreover, the re-election of Donald Trump will likely not offer prospects of lowering barriers to computing power. These bans exposed risky dependencies and determined an important practical goal of China on the international stage: to overcome development constraints and international isolation.

Chinese academics have also identified several other goals, along with the challenges China is currently facing on the international stage in its attempt to achieve these goals. These include actively participating in international organisations and multilateral mechanisms to

[10] Ibid.

[11] Zhang, D. (2023). China's AI Governance Path Under the Global Security Initiative. [全球安全倡议下的中国人工智能治理路径]. *Information Security and Communications Privacy*,2023(8):34-45;
Zhang, L. (2024). What kind of Artificial Intelligence Law does China need? - Basic Logic and Institutional Architecture of China's Artificial Intelligence Legislation. [中国需要一部怎样的《人工智能法》？中国人工智能立法的基本逻辑与制度架构.] *Legal Science (Journal of Northwest University of Politics and Law)*, 2024 (3); 3-17.

[12] State Council. (20 July 2017). Notice on the Development Plan of the New Generation of Artificial Intelligence. [国务院关于印发新一代人工智能发展规划的通知]. Retrieved from: https://www.gov.cn/zhengce/content/2017-07/20/content_5211996.htm

[13] Diksha Madhok. 2 January 2024. ASML forced to suspend some China exports after US escalates tech battle. CNN. Retrieved from: https://edition.cnn.com/2024/01/02/tech/asml-china-exports-suspension-intl-hnk/index.html

push for common principles and norms for AI ethics and regulation, and strengthening information sharing, law enforcement cooperation and managing cross-border AI security risks.[14] However, from a Chinese perspective, this international participation and coordination is hindered by the "stigmatisation" that China is suffering from the West, and by the acute sense of competition present among countries.[15] Chinese scholars contend that while China stresses the importance of international coordination, it has not found a very willing partner in the West. Consequently, many Chinese experts suggest that China's best way forward is to find other partners in the Global South, and that it should pay close attention to the intrinsic needs of these countries.[16] Indeed, since around 2019, China has become a vocal actor on issues of equal benefits of AI and equal participation in AI governance, emphasising "true multilateralism" and "opposing the construction of exclusive blocs that maliciously obstruct the technological development of other countries".[17]

1.2 Summaries of the development of relevant policies

Since 2015, the Chinese government has been publishing policy related to AI. As the government experiments and develops AI regulations, carefully balancing between the goals of development and security, the overall regulatory approach has shifted over time, with either development or security taking frontstage. The earliest policy developments exhibited great optimism over AI's potential for enabling economic development, typified by Made in China 2025's (2015) portrayal of AI as the next economic growth engine. Policies developed between 2015 and 2018 primarily focused on the expansion and integration of AI in society, with little concern for risk management and prevention. These earlier developments, such as

[14] Zhang, 2023, *China's AI Governance Path Under the Global Security Initiative*.

[15] Zhang, 2024, *What kind of Artificial Intelligence Law does China need?*;
Jia, K., Yu, H., & Xue, L. (2024). Characteristics, Deficits and the New Stage of Artificial Intelligence Global Governance - Direction of Reform. [人工智能全球治理新阶段的特征、赤字与改革方向]. *International Forum* 2024 (3): 62-78.

[16] Zhang, 2024, *What kind of Artificial Intelligence Law does China need?*

[17] Ministry of Foreign Affairs. (17 November 2022). China's Position Paper on Strengthening Ethical Governance of Artificial Intelligence. [中国关于加强人工智能伦理治理的立场文件]. Retrieved from: https://www.mfa.gov.cn/wjb_673085/zzjg_673183/jks_674633/fywj_674643/202211/t20221117_10976728.shtml;
Wang, J. 9 May, 2024. China calls on the international community to work together to advance global AI governance. [中方呼吁国际社会携手合作共同推进全球人工智能治理]. Xinhua News. Retrieved from: https://www.gov.cn/yaowen/liebiao/202405/content_6949929.htm

the 2017 New AI Development Plan, mostly functioned as a wish list for China's role in the global AI landscape, used vaguer language and set out broad goals.

From 2019 onward, China's AI policy gradually took on a more cautious and pragmatic tone, featuring more security concerns.[18] Policy efforts in this phase, however, display a more precise and narrow scope. This feature arose from the flexible and pragmatic approach that China is taking to managing AI risks, which is to introduce tools and policies when the need arises in practice.[19]

There are several regulations that target specific issues and/or functions of AI, which often find their legal basis in the Cybersecurity Law (2017), the Personal Information Protection Law (2021) and the Data Security Law (2021). These regulations, such as the Provisions on the Administration of Deep Synthesis Internet Information Services (2022),[20] the Internet Information Service Algorithmic Recommendation Management Provisions (2021),[21] and Interim Measures for the Management of Generative Artificial Intelligence Services (2023),[22] provide the bases for fines and other penalties in cases of incompliance. While these regulations can overlap and build on each other, they each target different aspects of AI. For example, the Deep Synthesis Provisions, enacted in 2022, targets deepfakes and the risks associated with it by making it mandatory for providers to label such content as synthetically generated and to take steps to avoid discrimination (e.g. based on gender) and the exploitation of people (e.g. delivery drivers, online consumers and people with gambling addictions) to maintaining control over online (political) content.[23]

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[18] Qiao-Franco, 2024, *China's artificial intelligence ethics*.

[19] Ibid;
Jia, 2024, *Deficits and the New Stage of Artificial Intelligence Global Governance*.

[20] Cyberspace Administration of China. (11 December 2022). Provisions on the Management of Deep Synthesis of Internet Information Services. [互联网信息服务深度合成管理规定]. Retrieved from: https://www.cac.gov.cn/2022-12/11/c_1672221949354811.htm

[21] Cyberspace Administration of China. (31 December 2021). Provisions on the Management of Algorithmic Recommendations for Internet Information Services. [互联网信息服务算法推荐管理规定]. Retrieved from: https://www.gov.cn/zhengce/zhengceku/2022-01/04/content_5666429.htm

[22] Cyberspace Administration of China. (13 July 2023). Interim Measures for the Management of Generative Artificial Intelligence Services. [生成式人工智能服务管理暂行办法] Retrieved from: https://www.cac.gov.cn/2023-07/13/c_1690898327029107.htm

[23] Matt Sheehan. 2023. China's AI Regulations and How They Get Made. Horizons. Retrieved from: https://www.cirsd.org/files/000/000/010/82/21e461a985f43655b1731b3c1b50cdccb631afaf.pdf

In addition to these central regulations, there are standards that provide nonbinding guidelines. China's National Information Security Standardization Technical Committee (TC260) and the National Standards Committee have been releasing guidelines on various topics, such as algorithm ethics,[24] labelling and annotating training data,[25] assessment methods for machine learning algorithms,[26] and AI safety governance.[27] Notably, policy developments in AI are highly connected to other policy developments, particularly data governance. China's approach to data governance is not limited to personal data but consists of a more holistic method that includes many types of data deemed important to national security, regime stability, and economic development.

While a patchwork of regulations and guidelines is being crafted to target specific risks emerging in the current AI landscape, the effort to build a more comprehensive framework for regulating AI is ongoing. The Legislative Work Plans of the State Council for 2023 and 2024, issued yearly by the General Office of the State Council, proposed to "submit the draft of the artificial intelligence law to the Standing Committee of the National People's Congress for consideration". Despite these plans, however, an AI law has currently been taking a back seat due to the more pressing economic challenges at hand.

At the same time, academics and policy experts have continued shaping proposals for what such a law might look like. Recent expert proposals, such as the 'Model Law on Artificial Intelligence 2.0 (Expert Draft)' released in March 2024 by the Chinese Academy of Social Sciences, reflect a continued effort to balance development and security. This Expert Draft puts forward ideas and mechanisms to regulate and promote AI. It proposes a light-handed approach to regulation, which would be implemented by means of a "negative list".[28] The

[24] Technical Committee 260. (January 2021). Cybersecurity Standards Practice Guidelines -Guidelines for the Prevention of Ethical Security Risks of Artificial Intelligence. [网络安全标准实践指南 —人工智能伦理安全风险防范指引] Retrieved from: https://www.tc260.org.cn/file/zn10.pdf

[25] Technical Committee. (23 May 2023). Artificial intelligence—Code of practice for data labeling of machine learning. [人工智能 面向机器学习的数据标注规程] Retrieved from: https://openstd.samr.gov.cn/bzgk/gb/newGbInfo?hcno=2BE1BE0093F37778CFB2071DD490EECD

[26] Technical Committee. (27 July 2021). Information security technology-Security specification and assessment methods for machine learning. [信息安全技术 机器学习算法安全评估规范]. Retrieved from: https://www.tc260.org.cn/file/2021-08-04/6b530404-858b-4c9d-8d89-a83239ec5712.pdf

[27] Technical Committee 260. (September 2024). AI Safety Governance Framework. Retrieved from: https://www.tc260.org.cn/upload/2024-09-09/1725849192841090989.pdf

[28] Zhou, H., et al. (16 April 2024). The Model Artificial Intelligence Law. Retrieved from: https://zenodo.org/records/10974163

promotion of AI development and deployment, meanwhile, would be made possible by State support for computing infrastructures, innovation in AI and human capital.[29]

In an interview about the Expert Draft, one of the authors, Professor Tianhao Chen of Tsinghua University, further elucidated the envisioned balancing act between AI development and regulation, for instance regarding the protection of intellectual property rights. Chen explained that as long as the AI providers fulfil their responsibilities, e.g. by correctly labelling AI-generated content, the provider will not be held jointly liable with the developer.[30] This measure was inspired directly by recent rulings of the Guangzhou Internet Court on similar issues.[31] Other inspiration for the Draft was drawn from the EU's AI Act, particularly the tiered classification management and institutional design for AI open source.[32]

While the impact of this Expert Draft is difficult to predict, since past experiences with expert drafts in similar areas show vastly different outcomes, the Draft can give us some valuable insights.[33] First, it aligns with the broader academic debate in China on AI regulation, which prioritizes development alongside regulation (security), as evidenced by the Draft's dedicated promotion chapter and negative list approach.[34] Second, it offers insight into where scholars will likely look for inspiration, drawing primarily from existing domestic provisions, regional and national court rulings, and, to a certain extent, select foreign AI laws, particularly the EU AI Act.

On the international level, the Global AI Governance Initiative is meant to contribute to the national goals of economic development without endangering national security. As discussed above, the main challenges are access to computing power and participation in international rulemaking. Among Chinese scholars, there is a clear notion that too much soft global

[29] Ibid. Chapter II
[30] The making of an Artificial Intelligence Law - Q&A with the creators of China's expert draft AI law. (2024). European Chinese Law Research Hub. Retrieved from: https://blog.uni-koeln.de/eclrhub/2024/05/19/the-making-of-an-artificial-intelligence-law/
[31] Ibid.
[32] Ibid.
[33] For an example of past experiences with expert drafts, see: Creemers, R. (2022). China's emerging data protection framework. *Journal of Cybersecurity*, 8(1), tyac011.
[34] Zhang, 2024, *What kind of Artificial Intelligence Law does China need?*

governance will be an undesirable development, because of the profit-seeking nature of the private sector and a lack of supervision.[35] How exactly global AI governance should be structured is still being debated, with some scholars preferring "competitive co-operation" (竞争性合作) over a unified global regulatory framework or de-globalisation.[36] Jia et al. identify three key areas of focus for this approach. First, it should take a systemic view of AI R&D and application, balancing competition and cooperation while addressing national security concerns and actively fostering international collaboration to shape AI governance. Second, China should work to increase the representation of developing countries on global AI platforms, leveraging initiatives like the Belt and Road, BRICS and ASEAN to promote shared benefits. Third, China should leverage its domestic AI governance experience to enhance international exchanges, build trust, and establish collaborative mechanisms like public reporting and peer review to ensure effective AI governance.[37]

Notably, current Chinese international policy efforts offer important insights into China's view of the technology landscape, specifically that the playing field for global AI governance is not equal. The Global AI Governance Initiative heavily stresses multilateralism and condemnation of discriminatory practices. The Initiative was introduced in October 2023 by Chinese leader Xi at the third Belt and Road Forum for International Cooperation in Beijing and provided direction for the Chinese resolution on "Enhancing International Cooperation on Capacity-building of Artificial Intelligence", accepted by the UN General Assembly (UNGA) in July 2024. The Initiative incorporates various principles, such as human-centred AI, respect for countries' sovereignty and national laws, multistakeholder participation and consensus-based decision-making in AI governance.[38]

The previously mentioned TC260 document on AI Safety Governance Framework, released in September 2024, was formulated to add substance to the Global AI Governance Initiative. Its goal is to "implement the Global AI Governance Initiative and promote consensus and coordinated efforts on AI safety governance among governments, international organisations, companies, research institutes, civil organisations, and individuals, aiming to effectively

[35] Jia, 2024, *Characteristics, Deficits and the New Stage of Artificial Intelligence Global Governance*.
[36] Ibid, p. 77.
[37] Ibid.
[38] Ministry of Foreign Affairs. (20 October 2023). Global AI Governance Initiative. Retrieved from: https://www.mfa.gov.cn/mfa_eng/zy/gb/202405/t20240531_11367503.html

prevent and defuse AI safety risks".[39] The document clearly targets foreign audience, as it was published in English, which is uncommon for China's national technical standardisation body for cybersecurity. The Framework proposes a variety of mechanisms and principles to regulate AI, though still in broad strokes. Its focus on the incorporation of AI in existing industries, as opposed to general tools, aligns with China's approach. The document will likely be guiding for national AI regulation efforts as well, since technical standards are an effective way of experimenting with different types of regulation for Chinese technology policymakers.

Other policies, such as the Global Data Security Initiative, complement the Global AI Governance Initiative by targeting AI's primary resource: data.[40] Together, these initiatives serve as valuable tools for China on the international stage. While they do not impose specific commitments or strict rules, they help China claim the moral high ground in AI governance and challenge the hegemony of its main opponents, which it views as hindering its technological development. Moreover, these initiatives are useful tools for China's foreign policy to recruit and ameliorate collaborations with the Global South. By advocating for more equality and consensus-building in global governance on digital issues, China's AI initiatives can appeal to countries that traditionally do not wield much influence regarding international norms.

[39] TC260, 2024, *AI Safety Governance Framework*.
[40] State Council. (8 September 2020). Global Initiative on Data Security. Xinhua News. Retrieved from: https://english.www.gov.cn/news/topnews/202009/08/content_WS5f573805c6d0f7257693bb01.html

2 Key Players in Policymaking

The supervision of China's AI landscape is fragmented across various sectors. While much of China's political system is centralised, it should not be assumed that a small group of bureaucratic elites holds exclusive authority over AI policy decisions. Within the formal policy structure, there is significant fragmentation due to competing interests, and functional ministries and local governments enjoy considerable flexibility in interpreting and implementing policies. Beyond the formal policy process, there is ample room for dynamic policy debates and feedback from a wide range of actors, including academics, researchers, entrepreneurs, technocrats, other social elites, and the public. Consequently, there is no singular path that defines AI policymaking in China. Rather, the shifting directions of AI regulation emerge from the complex interplay of these various actors and the wax and wane of their political influence in the process. Understanding the key players involved and their roles in the policymaking process is therefore essential.

2.2 Architecture of China's AI administrative system

As an enabling technology with far-reaching implications and numerous potential applications, AI falls under the jurisdiction of many ministries and government bodies in China. At the highest level, the State Council is the primary administrative body overseeing AI policy formation. The State Council can issue administrative regulations without requiring approval from the National People's Council (NPC), a process commonly seen in the science and technology sector.[41] However, for these regulations to become law, they must be passed by the NPC.

AI policies adopted by the State Council serve as cornerstone strategic documents (see the red block in Figure 1), best understood as aspirational "wish lists". They set forth high-level strategic goals and signal political will for further action, but lack specific directives for

[41] Within the State Council, the National Science and Technology Education Leading Group (国家科技领导小组) provides overall supervision of and strategic guidance to lower-level ministries responsible for formulating AI policies. Like other Leading Small Groups established around key policy areas—such as poverty alleviation, healthcare reform, and food and product safety—this group brings together representatives from the Chinese Communist Party (CCP), the military, and relevant ministries to coordinate policy efforts and ensure high-level alignment.

effective implementation.[42] For instance, the New Generation AI Development Plan issued by the State Council in 2017 only serves as a long-standing national strategy that contains broad goals to make China a global leader in AI by 2030, but it does not specify concrete measures for achieving these goals.

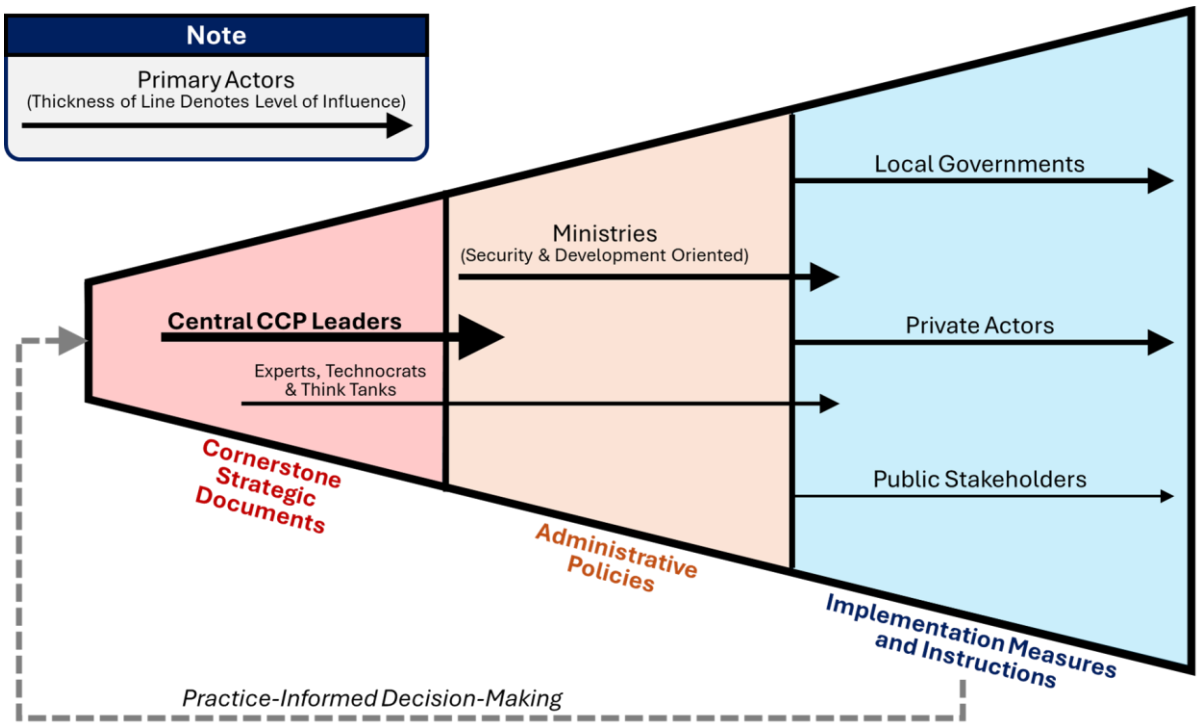

Figure 1. China's policymaking process and key actors across three tiers of policy outcomes[43]

As a result, the responsibility for drafting and implementing concrete administrative policies falls to the functional ministries overseeing the relevant issues (see the orange block in Figure 1). These ministries translate the broad agendas and strategies set by central leaders into actionable and routine policy instruments, such as guidelines, guiding opinions, white papers, regulations and action plans. While they are tasked with upholding the core objectives and intent of strategic documents, they also have significant discretion to refine, interpret and

[42] Yang, H. & Yi, H. (2023). Frontiers of policy process research in China. *Rev Policy Res*, 40: 484-489. Retrieved from: https://doi.org/10.1111/ropr.12558

[43] Adapted from "Figure 3. The Four-phase Model of the Institutionalized Policy-making Mechanism" in Chen, L. & Naughton, B., 2016. "An institutionalized policy-making mechanism: China's return to techno-industrial policy," Research Policy, vol. 45(10), retrieved from https://doi.org/10.1016/j.respol.2016.09.014, p. 2145

select policy tools—often without direct input from the State Council or the Politburo Standing Committee. It should be noted that ministries involved in AI policymaking are deeply interconnected, often collaborating on policy directives through jointly developing[44] and co-signing these directives. This cooperation is essential for creating bureaucratic buy-in and enhancing coordination across sectors. However, each area is primarily led by one ministry, and the involvement and roles of these ministries vary depending on the specific issue area. This complexity is further intensified by the rapidly shifting technological and market dynamics, as outlined further below.

Among the functional ministries, the Cyberspace Administration of China (CAC) wields decisive influence over AI policy by virtue of its responsibility for overseeing online content. The CAC has been at the forefront of developing and implementing AI legislation, particularly in regulating information dissemination powered by algorithmic recommender systems that may conflict with mainstream values or government priorities. The CAC also leads in crafting legislation related to synthetically generated content that could pose threats to public order and national security.

The Ministry of Science and Technology (MOST) is the primary government body responsible for regulating AI R&D. In 2019, MOST established an expert group, the National New Generation AI Governance Expert Committee, to develop an overarching ethical framework for regulating AI research. This Committee is formed by officials from MOST and experts from government-affiliated think tanks.

The Ministry of Industry and Information Technology (MIIT) is another key player in AI policymaking, focusing primarily on industrial and commercial applications of AI. It has co-signed many AI regulations developed by the CAC or other ministries that deal with the AI industry. These include, for instance, the Guidelines for the Construction of a National New Generation AI Standard System (2020), the Guiding Opinions on Strengthening Overall Governance of Internet Information Service Algorithms (2021), Provisions on the Management of Algorithmic Recommendations in Internet Information Services (2021), and the Provisions on the Administration of Deep Synthesis Internet Information Services (2022).

[44] Sheehan, M. (2023). China's AI regulations and how they get made. *Horizons: Journal of International Relations and Sustainable Development*, (24), 108-125.

Other key ministries such as the National Development and Reform Commission, the State Standardisation Administration, the Ministry of Public Security, the Ministry of Education, the Ministry of Foreign Affairs, the Ministry of Transport, and the State Administration of Market Reform are also regularly involved in making and implementing AI policies within their specific mandate areas. These ministries have authority over certain issues raised by AI or specific sectors where AI is applied, but it is often difficult to clearly delineate the precise boundaries of each government body's power due to the interconnected nature of AI regulation.

It is important to note that the respective political influence of China's ministries fluctuates depending on the government's priorities, whether focused on development or security. Ministries often have competing interests and vie for leverage over specific policy domains.[45] In the context of AI, MOST, MIIT, and the CAC each have differing views on whether to loosen or tighten controls over AI development and applications. MOST and MIIT generally lean towards a more lenient approach, supporting science and technology development, while the CAC favours stricter regulation. Typically, backlash against AI use usually triggers tighter controls, while international competition pressures and the need for rapid technology progress spur policies that loosen restrictions. Given the less optimistic economic growth prospect, the ongoing goal of AI leadership, and the growing sense of falling behind the US after the popularisation of ChatGPT, China's focus is likely to shift towards stimulating the AI industry and technological development. In this context, MOST and MIIT are likely to gain prominence over other bodies responsible for security matters. However, the regulatory landscape may remain chaotic, with multiple agencies asserting authority over AI, as actors carefully navigate the balance between the competing demands of strengthening governance and advancing technology for economic development.

At the local level, provincial governments and ministries also play a crucial role in implementing and interpreting national policies, often establishing specific implementation measures and instructions (see the blue block in Figure 1). While they must conform with the general direction set by the central government, local governments and ministries are

[45] Corne, P. H. (2002). Creation and Application of Law in the PRC. *The American Journal of Comparative Law*, 50(2), 369-443.

encouraged to adopt and implement homegrown policies or pilot projects. They play a key role in stimulating innovation by offering fiscal incentives (e.g., tax offsets and the reduction of import duties), grants, financial support (bank loans at subsidised states, start-up capital, and cheap land), government procurement, human resources, and infrastructure support. Many of these special measures are applied in high-tech industrial development zones, including the 17 National Artificial Intelligence Innovative Development Pilot Zones.[46] Within these zones, companies and research institutes are allowed to circumvent certain regulations that could otherwise hinder technological progress.

Finally, it is important to clarify the CCP's role in shaping China's AI policymaking, as it is often misunderstood, particularly in Western analyses.[47] CCP leadership is deeply embedded in the country's public administrative system, including ministries and government departments responsible for AI policy, as officials in administrative roles are typically party members who follow the overarching policy direction set by the CCP leadership, particularly the Politburo Standing Committee. Moreover, how the CCP views the world and its role in it will impact how events are interpreted and what are deemed "issues" worth addressing.[48] However, AI policymaking is primarily driven by technical, economic, and social considerations as they emerge in practice, rather than by ideological imperatives. While policy documents often incorporate rhetorical alignments with CCP ideology and Xi Jinping's worldview, this serves to demonstrate consistency with broader national strategies rather than dictate specific regulatory or industry measures. For instance, the "new security concept" (新安全观) and the "global security initiative" (全球安全倡议) are frequently referenced in AI policy documents to signal symbolic alignment with Xi's governance philosophy. Moreover, as a subset of national governance, AI governance aligns with broader state objectives, including national security and party leadership. However, neither Xi Jinping nor the CCP seems to directly intervene in the specifics of AI policymaking. Instead, the process remains

[46] State Council. (6 December 2021). 17 AI pilot zones built in China. Xinhua news. Retrieved from: http://english.www.gov.cn/statecouncil/ministries/202112/06/content_WS61ae0e58c6d09c94e48a1c59.html

[47] Matt Sheehan, China's AI Regulations and How They Get Made. See also: A. Băzăvan. 2019. Chinese government's shifting role in the national innovation system. Technological Forecasting and Social Change, 148, 119738.

[48] Ibid 120.

diverse, contested, and informed by technical expertise, scientific knowledge, and practical industry needs.

2.2 Public involvement in decision-making

While the state intervenes greatly in AI regulation and development, there remains a considerable amount of room for policy input from outside the government. This is due in part to the nascent and highly technical nature of AI issues, as well as the "prudent yet accommodative" regulatory approach that Chinese leaders have adopted towards AI and other emerging industries.[49] This approach reflects a commitment to practical, adaptable regulations informed by the technological realities of AI development and application, which are often discovered through continuous interaction with leading scientists, researchers, and industrial leaders (see the practice-informed feedback loop in Figure 1).

Within the official policymaking structure, entrepreneurs, scientists and policy experts, especially those affiliated with government think tanks, are directly involved in policymaking. For example, the National New Generation AI Governance Expert Committee, affiliated with MOST, includes scholars from the China Academy for Information Communications Technology, the Chinese Academy of Sciences, and Tsinghua University's Institute for AI International Governance.

The AI Security Governance Committee, a new agency formed under the CAC in October 2023, also warrants attention as it takes shape. This body was launched by the National Computer Network Emergency Response Technical Team/Coordination Centre (CNCERT/CC), Beijing Academy of Artificial Intelligence, Shanghai Artificial Intelligence Laboratory, Alibaba Cloud and Huawei. It now consists of members from 58 organisations, universities, research institutes, and enterprises involved in AI development. Tasked with overseeing AI safety, the Committee is designed to function through a multistakeholder, collaborative framework. [50]

[49] Qiao-Franco, 2024, *China's artificial intelligence ethics*, 198.

[50] Establishment of the Artificial Intelligence Security Governance Professional Committee of the China Cyberspace Security Association. [中国网络空间安全协会人工智能安全治理专业委员会成立]. (14

Business leaders are sometimes appointed to government positions where they contribute to the development of AI-related technical standards.[51] For instance, the National Information Security Standardisation Technical Committee, established in 2019 to regulate deepfake technologies, includes scholars and entrepreneurs from SenseTime, Tencent, Ant Financial (the finance arm of Alibaba), Pingan Group, Xiaomi, and iFlyTek.[52] Likewise, the AI Specialised Committee, the first institutionalised body of the World Internet Governance set up by the CAC in November 2024, includes representatives from major Chinese tech companies alongside international academics and executives from Western corporations such as IBM, SAP, and Cisco.

Beyond formal policymaking channels, the government often solicits feedback through public consultations, public hearings, and private discussions with scientists, business leaders, and other stakeholders. Research institutes and universities play a key role in shaping policy, as seen in the two expert drafts of China's AI law submitted by scholars of the Chinese Academy of Social Sciences and the China University of Political Science and Law.[53] While these expert drafts are intended to feed into legislative work, it remains unclear how much of their content will be incorporated into the forthcoming comprehensive AI law.

Research institutes and universities are also frequently invited to comment on policies or policy drafts through commissioned research reports (课题). Additionally, social elites can influence policy through the pishi (批示) process, offering direct recommendations to the ministries responsible for drafting regulations.[54] Key institutions active in AI policy discussions include the Chinese Academy of Sciences, the Chinese Academy of Social Sciences, the China Academy for Information and Communication Technology, Tsinghua's Institute for Artificial Intelligence International Governance and Centre for International

October 2024). The Paper. Retrieved from: https://m.thepaper.cn/kuaibao_detail.jsp?contid=24934133&from=kuaibao

[51] Zhu, J. (2024). China's approach to AI standardisation: state-guided but enterprise-led. *FIIA briefing paper*, 391.

[52] Qiao-Franco, 2024, *China's artificial intelligence ethics,* 203.

[53] This concerns the Artificial Intelligence Law of the People's Republic of China (Draft for Suggestions from Scholars) and the Artificial Intelligence Law of the People's Republic of China (Experts Version).

[54] Zhao, T. (2023). "Dig Deep and Reach Wide": The Changing Politics of the Chinese Communist Party's Consultative Information System. *The China Quarterly*, 253, 57–73. doi:10.1017/S0305741022001308.

Security and Strategy, the Beijing Academy of Artificial Intelligence, and the Shanghai Artificial Intelligence Laboratory.

The Chinese Association for Artificial Intelligence serves as the primary industry-wide association in the AI sector, comprising both foreign and domestic firms. It submits regular reports to state officials outlining industrial needs and regulatory concerns, reflecting the growing influence of industrial associations in China's policymaking process. Individual companies also engage in direct lobbying to advocate for policy changes.

The behind-the-scenes work that occurs before final policy approval is critical in shaping regulatory outcomes. Experts and industry leaders help government regulators bridge knowledge gaps and better understand the societal challenges and technical complexities related to AI.[55] More importantly, these non-state actors tend to interact more frequently with international counterparts than government officials do. The shared concerns and priorities of Chinese academics, researchers, technocrats and entrepreneurs with their international peers help explain the areas of convergence between Chinese and global AI regulations.

[55] Sheehan, 2023, *China's AI regulations and how they get ma*de; Zhu, 2024, *China's approach to AI standardization*.

3 China's Involvement in Multilateral Processes on AI

China has become increasingly proactive in expanding its global outreach in AI, evident in its growing involvement in multilateral diplomacy across myriad UN forums and international processes. While Beijing's growing confidence and aspirations to shape the world in its image are widely recognised, what is often overlooked is the country's fair share of fears and insecurities in this domain.

China's global AI governance approach largely mirrors its domestic strategy, which integrates development and security, although development has taken precedence, at least in recent years.[56] China views AI primarily through a pragmatic and utilitarian lens, emphasising its role in boosting economic growth and industrial modernisation.[57] Economic development is considered fundamental to national security, encapsulated in Xi's dictum: "failure to develop is the greatest source of insecurity" (不发展是最大的不安全).[58] Despite adopting a pro-development approach, rising ethical and security concerns regarding AI's increasing pervasiveness have prompted Beijing to embrace safeguards and accountability mechanisms to ensure AI is "safe, reliable and controllable". In this sense, there is significant convergence between Chinese and international perspectives on AI governance.[59]

China seeks to shape the external environment in a way that aligns more closely with its national development goals, alongside its desire to safeguard its domestic AI approach and maintain its technological edge. Beijing's multilateral diplomacy surrounding AI reflects a deep-rooted apprehension of structural inequalities in the global technology landscape, which disadvantage China as a latecomer. The clout of Western powers over science and technology regulation has long fuelled Chinese leaders' concerns about their fair representation in setting global rules, standards and legal frameworks. Expanding its influence at the UN and other

[56] Feng, S., Xue, S. & Ma, Y. (2024). Global AI Governance: A Diversified Process and Competitive Landscape. [全球人工智能治理：多元化进程与竞争性图景] Strategic Decisions Research 2024 (3): 87-108.

[57] Qiao-Franco, 2024, China's artificial intelligence ethics, 194.

[58] Failure to cooperate is the greatest risk, Failure to develop is the greatest insecurity. [不合作是最大的风险 不发展是最大的不安全]. (5 July 2023). China's People's Daily. http://paper.people.com.cn/rmrb/images/2023-07/05/15/rmrb2023070515.pdf

[59] Xi Called for Promoting the Healthy Development of A New Generation of AI: Group Study of the Political Bureau.[习近平要求推动新一代人工智能健康发展 政治局集体学习]. (2018). CCTV. Retrieved from: https://baijiahao.baidu.com/s?id=1615845925658912776&wfr=spider&for=pc

multilateral processes, drawing upon its increased power and strength, is therefore seen as a logical step in addressing what Beijing perceives as an unequal structure.

Meanwhile, Beijing's fears and insecurities in shaping its global AI strategy should not be disregarded. While China has good reason to use the multilateral processes to promote its worldview and advance its interests, its recent diplomatic activism on the global stage should be more appropriately understood from the lens of its threat perceptions. Since October 2022, the US, alongside Japan and the Netherlands, has imposed export control measures restricting China's access to advanced semiconductors produced with US technology. In July 2024, additional outbound investment controls targeted Chinese AI start-ups, with further pending restrictions on access to advanced cloud computing services abroad and potentially even cutting-edge general-purpose AI models. Moreover, US-led initiatives to strengthen cooperation among like-minded governments under the banner of "democratic values" have reinforced China's concerns that it is facing strategic containment by Western powers. In response, China has pursued more active diplomacy and international engagement, framing its efforts as a counterbalance to escalating decoupling measures. Beijing has increasingly emphasised that "no cooperation is the biggest risk" (不合作是最大的风险), positioning itself as an advocate for continued global collaboration.[60] China has also deepened its engagement with the Global South to prevent potential isolation. The following paragraph turns to a detailed overview of China's initiatives across various multilateral forums, focusing on its efforts to tackle emerging threats, lead norm setting, and to shape the international landscape.

3.1 Activities at the United Nations and beyond

Paramount to China's growing role in AI agenda-setting is its strategic use of UNESCO's soft-power vehicles, including the International Bureau of Education and the World Heritage Committee.[61] The US withdrawal from UNESCO between 2018 and 2023 created space for

[60] China's People's Daily, 2023, *Failure to cooperate is the greatest risk*.

[61] State Council. (19 July 2021). China vows greater effort in heritage preservation. China Daily. Retrieved from:

https://english.www.gov.cn/news/topnews/202107/19/content_WS60f4b12cc6d0df57f98dd341.html;

China to exert greater influence within the organisation. China has replaced the US as the largest contributor to UNESCO's regular budget and is now one of its top donors in voluntary contributions.[62] UNESCO has been at the forefront of developing many AI standard-setting instruments, several of which were led by China. For instance, the "Beijing Consensus on AI and Education", adopted at the International Conference on AI and Education in Beijing in 2019, was funded by the Chinese government.[63] The International Forum on AI and the Futures of Education, a follow-up initiative to implement the Beijing Consensus, was organised by China's Ministry of Education in partnership with UNESCO in Qingdao in December 2020.[64] Companies such as Huawei and Tencent, along with provincial-level governments such as Fujian and Gansu, are also actively involved in numerous AI-related capacity-building initiatives in such fields as education, science, culture, and communication.[65]

China has also played an active role in drawing up the UNESCO Recommendation on the Ethics of Artificial Intelligence,[66] the first global framework overseeing the ethical dimensions of AI to contribute to achieving the Sustainable Development Goals. Professor Zeng Yi of the

Assistant Director-General for Education pays a courtesy visit to the Minister of Education of the People's Republic of China. (27 July 2023). UNESCO. Retrieved from: https://www.unesco.org/en/articles/assistant-director-general-education-pays-courtesy-visit-minister-education-peoples-republic-china

[62] Meng, W. (2024). Is power shifting? China's evolving engagement with UNESCO. *Global Policy*, 15(Suppl. 2), 97–109. Retrieved from: https://doi.org/10.1111/1758-5899.13373

[63] UNESCO. (16-18 May 2019). Beijing consensus on artificial intelligence and education. Retrieved from: http://www.moe.gov.cn/jyb_xwfb/gzdt_gzdt/s5987/201908/W020190828311234688933.pdf

[64] Miao, F., et al. (2021). International Forum on AI and the Futures of Education. Developing competencies for the AI Era, 7-8 December 2020: synthesis report. Retrieved from: https://unesdoc.unesco.org/ark:/48223/pf0000377251

[65] UNESCO Collaborates with Huawei on Artificial Intelligence Training in Nairobi, Kenya. (9 October 2019). Retrieved from: https://www.unesco.org/en/articles/unesco-collaborates-huawei-artificial-intelligence-training-nairobi-kenya ;
UNESCO-Led Workshop in Gansu (China) Nurtures Inclusive Cultural Policies. (12 July 2024). Retrieved from: https://www.unesco.org/en/articles/unesco-led-workshop-gansu-china-nurtures-inclusive-cultural-policies;
He, W. (20 March 2021). Tencent in digital pact to protect cultural relics. China Daily. Retrieved from: https://www.chinadaily.com.cn/a/202103/20/WS6055626aa31024ad0bab06b6.html

66 UNESCO. Recommendation on the Ethics of Artificial Intelligence. Retrieved from: https://www.unesco.nl/sites/default/files/inline-files/Rec%20on%20Ethics%20of%20AI%20-%20Flyer%20-%20UNESCO%20HQ_0.pdf

Chinese Academy of Sciences served on the 24-member Ad Hoc Expert Group responsible for leading the development of this document, which was endorsed in November 2021.[67]

At standards development organisations (SDOs), such as the Institute of Electrical and Electronics Engineers (IEEE) and the ITU, China has been a very active participant. Standards have long been a priority for the Chinese government. In 2015, the State Council published the Plan for Deepening the Standardization Reforms, and in 2018 the standardisation efforts were reinvigorated, including an institutional reform that tasked the Department of Standards and Technology Management and the Department of Standard Innovation Management of the State Administration for Market Regulation (SAMR) with the specific responsibilities of the Standardization Administration of China.[68] Other documents, such as the SAMR "Main Points of National Standardization Work in 2020", which is part of the China Standard 2035 project, further underline the prioritisation of standards development in AI and other central technologies, such as IoT, blockchain and cloud computing.[69]

Standards can drive economic growth by facilitating trade, providing a competitive advantage to first-movers, and generating extra income from firms that invest in their patent portfolios. However, since AI is less affected by interoperability issues compared to sectors like telecommunications, the fragmentation of standards is more likely to occur. Moreover, the process of standards development can be tricky to trace, as the environment in which they emerge is often a complicated and multi-layered network of hundreds, if not thousands, smaller SDOs. Therefore, it remains challenging to give a comprehensive overview of China's behaviour in SDOs, which is further complicated by the variety of (Chinese) actors involved in these processes.

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[67] UNESCO. (2020). Composition of the Ad Hoc Expert Group (AHEG) for the Recommendation on the Ethics of Artificial Intelligence. Retrieved from: https://unesdoc.unesco.org/ark:/48223/pf0000372991

[68] State Council. (10 September 2015). Notice of the General Office of the State Council on Printing and Distributing the Action Plan for Implementing the Reform Plan for Deepening Standardization Work (2015-2016). [国务院办公厅关于印发贯彻实施《深化标准化工作改革方案》行动计划（2015-2016年）的通知]. Retrieved from: https://www.gov.cn/zhengce/content/2015-09/10/content_10154.htm

[69] Negro, G. (2023). China and the ITU: A History of Standards. *Global Governance: A Review of Multilateralism and International Organizations*, 29(3), 367-391. Retrieved from: https://doi.org/10.1163/19426720-02903006

Still, there have been some significant achievements and developments in AI standards by Chinese actors. China has been active and successful in many SDOs, such as the IEEE, where it successfully proposed the IEEE P70XX series of standards, including the AI Technology Transparency Standard (7001-2021), the AI Design Ethics Process Standard (7000-2021), the AI Bias Standard (7003TM), the Ethics-Driven Enabling Design Standard (7003TM), and the AI Design Standards (7008TM), among others. Despite this, China seems to favour the ITU.[70] The ITU holds a special position as a UN special agency, an intergovernmental organisation where the role of the government is more clearly defined and more central than in other SDOs that rely more heavily on the private sector and expert technology communities.[71] This preference is noticeable in various ways. First, China is among the leading contributors to the ITU's annual budget, committing 25 contributory units (roughly USD 6.6 million each year) and contributing experts to the ITU Study Groups.[72] Second, Chinese delegates to the ITU have consistently advocated for the expansion of the ITU's scope to include fields like AI, beyond its traditional areas of focus.[73] Third, Chinese companies, including ZTE and Alibaba DAMO Academy, are active participants in events organised by the ITU, such as the AI for Good Global Summit 2024.[74] While these efforts should not be overstated, given the consensus-building and non-binding nature of SDOs, they indeed display China's strong conviction to contribute to standards development and increase the role of government in these processes.

At the United Nations General Assembly's First Committee, which focuses on the military applications of AI, China was one of the first countries to call for the responsible use of AI weapon systems to prevent human catastrophe. It has also consistently contributed to the Group of Governmental Experts Meeting on Legal Autonomous Weapons Systems.[75] In response to increasing US trade sanctions and the blacklisting of multiple AI firms, Chinese

[70] Jia, 2024, *Characteristics, Deficits and the New Stage of Artificial Intelligence Global Governance,* 72.
[71] Negro, 2023, *China and the ITU*.
[72] ITU. (22 August 2022). ITU's top contributors: China. Retrieved from: https://www.itu.int/hub/2022/08/itu-top-contributors-china/
[73] Ibid.
[74] Roundup: Chinese companies under spotlight as AI summit kicks off in Geneva. (30 May 2024). Xinhua News. Retrieved from: https://english.news.cn/europe/20240531/9da959cf1bd4470b9bc8144c61b8a226/c.html
[75] Qiao-Franco, G., & Bode, I. (2023). Weaponised artificial intelligence and Chinese practices of human–machine interaction. *The Chinese Journal of International Politics*, 16(1), 106-128.

ambassadors issued thinly veiled criticisms of the US, accusing it of attempting to "draw ideological lines among countries" and seeking to maintain "absolute military superiority". The position paper China submitted to the sixth review conference of the United Nations Convention on Certain Conventional Weapons in December 2021,[76] along with subsequent statements at the UN Security Council, reiterated the message that AI should be used peacefully while not leaving any country behind. These statements also emphasised the need to strike a balance between AI development and security,[77] echoing China's broader AI governance goal of safeguarding national security and development.

The perceived risk of a coalition forming to contain China has spurred Beijing to adopt a more multi-pronged approach to international engagement, including in human rights, an area traditionally sensitive for China. Between 2023 and 2024, China initiated three joint statements at the United Nations Human Rights Council (UNHRC) focused on protecting the rights of specific vulnerable groups from AI-related harms. One statement addressed persons with disabilities, another focused on children, and the third on women.[78] While China shares concerns with international counterparts about protecting vulnerable groups from AI-related challenges like discrimination and digital divides, its statements uniquely emphasised principles of "fairness", "inclusiveness", and "respect [for] all countries' sovereignty, laws, national conditions, and historical, religious and cultural backgrounds".[79] Although these resolutions carry limited binding power, China's proactive stance in a platform where it is often criticised is a testament to its going all-out to break isolation and lead the AI agenda.

Notably, since the successful launch of OpenAI's ChatGPT in late 2022, the comparatively lacklustre performance of Chinese-developed LLMs has reshaped Chinese elites' assessment

[76] Sixth Review Conference of the High Contracting Parties to the Convention on Prohibitions or Restrictions on the Use of Certain Conventional Weapons Which May Be Deemed to Be Excessively Injurious or to Have Indiscriminate Effects. (20 December 2021). Retrieved from: https://docs-library.unoda.org/Convention_on_Certain_Conventional_Weapons_-SixthReview_Conference_(2021)/CCW-CONF.VI-WP.2.pdf

[77] Chinese envoy opposes use of AI to seek military hegemony at UN's first-ever debate on AI. (19 July 2023). Global Times. Retrieved from: https://www.globaltimes.cn/page/202307/1294710.shtml

[78] Ramsha, K. 916 July, 2023). China leads 70-country joint statement to assist people with disabilities using AI. The Diplomatic Insight. Retrieved from: https://thediplomaticinsight.com/china-leads-70-country-joint-statement-to-assist-people-with-disabilities-using-ai/

[79] Ibid.

of the country's AI standing vis-à-vis the US. While the recent success of DeepSeek may help restore confidence in China's AI capabilities, the prevailing view in Chinese scholarship has notably shifted. Before 2022, a more sanguine view saw China as on par with the US as regards AI. However, recent analyses characterise China as a "world leading follower" [世界领先的追赶者].[80] At the same time, China's global strategy has become more defensive, emphasising international cooperation to alleviate technological dependence and security risks associated with US control over critical AI components. For instance, at the UNGA, China's ambassador Fu Cong openly criticised US trade restrictions, arguing that such measures hinder the "healthy development of AI technology", "divide the world" in AI governance, and undermine developing countries' "right to development".[81]

Another important defensive move by China was to lead the development of a UNGA resolution entitled "Enhancing International Cooperation on Capacity-building of Artificial Intelligence", introduced in July 2024, less than four months after the adoption of the US-led UNGA resolution on AI. In contrast to the US-led resolution, which emphasises human rights and fundamental freedoms, the China-led resolution stresses promoting "an open, fair, and non-discriminatory business environment", capacity-building, and inclusive development.[82] This again demonstrates China's continued efforts to tackle development challenges and pre-empt potential isolation.

China has also expressed support for UN Secretary-General Antonio Guterres's proposal to create a new international body to govern AI under the UN framework, as highlighted in its "Global AI Governance Initiative"[83] and reiterated on a few other occasions, including by

[80] Zhang, 2024, *What kind of Artificial Intelligence Law does China need?*

[81] Zhang, M. (3 July 2024) UNGA adopts proposal by China on AI. China Daily. Retrieved from: https://www.chinadaily.com.cn/a/202407/03/WS66848c01a31095c51c50bfdf.html;
What is the significance of the adoption of the first resolution on AI capacity building proposed by China at the United Nations? [联合国通过首份中国主提的AI能力建设决议，有何深意]. (4 July 2024). Southern Metropolis Daily. Retrieved from: https://www.163.com/dy/article/J68QHVEV05129QAF.html

[82] Update: UNGA adopts China-proposed resolution to enhance international cooperation on AI capacity-building. (2 July 2024). Xinhua Silk Road Information Service. Retrieved from: https://en.imsilkroad.com/p/340890.html

[83] Ministry of Commerce. (25 October 2023). Global AI Governance Initiative. [全球人工智能治理倡议]. Retrieved from: https://ug.mofcom.gov.cn/gzdt/art/2023/art_2308f567fb4244e49a17a2d98890fd66.html

Premier Li Qiang at the World AI Conference in Shanghai and in the recent TC260 AI Safety Governance Framework.[84] However, the lack of detailed specifications regarding the mandates or functions of the proposed body seems to suggest that China is not yet ready to engage in a rapid move to create new oversight institutions or binding treaties on AI at the UN. According to remarks by Fu Cong and Zhang Jun, China's permanent representatives to the UN, the immediate role China envisions for the UN or a new UN body on AI is to provide an "inclusive" platform for initial international discussions on how to manage the downsides associated with emerging technologies and share their benefits.[85] UN regulation should remain "flexible to give countries the freedom to establish their own national-level regulations".[86] In this sense, the newly established UN High-level Advisory Body on Artificial Intelligence, which already includes two Chinese representatives — Professor Zeng Yi of the Chinese Academy of Sciences and Professor Zhang Linghan of China University of Political Science and Law — appears to meet China's current needs for these international discussions.[87]

3.2 China and the Global South in regional processes

As tensions between China and the US continue to escalate, building partnerships with Global South countries has become an increasingly important priority on China's diplomatic agenda. This shift is not only aimed at countering Western challenges but also at securing technology lock-ins, promoting the mutual recognition of tech standards, and integrating Chinese technology into foreign markets.[88] China's ongoing shortage of high-end semiconductors has

[84] State Council. (4 July 2024). Shanghai Declaration on Global Governance of Artificial Intelligence (Full Text). [人工智能全球治理上海宣言（全文)]. Xinhua News. Retrieved from: https://www.gov.cn/yaowen/liebiao/202407/content_6961358.htm

[85] Khushboo, R. (2 July 2024). China-led resolution on artificial intelligence passes in United Nations General Assembly. South China Morning Post. Retrieved from: https://www.scmp.com/news/china/diplomacy/article/3268788/china-led-resolution-artificial-intelligence-passes-united-nations-general-assembly

[86] Fung, B. (18 July 2023). UN Secretary General embraces calls for a new UN agency on AI in the face of 'potentially catastrophic and existential risks.' CNN. Retrieved from: https://edition.cnn.com/2023/07/18/tech/un-ai-agency/index.html

[87] United Nations. Members of the High-level Advisory Body on Artificial Intelligence. Retrieved from: https://www.un.org/en/ai-advisory-body/members

[88] Zhang, H. & Khanal, S. (2024). To Win the Great AI Race, China Turns to Southeast Asia. *Asia Policy*, 19 (1), 2024, p. 21-34. Retrieved from: https://dx.doi.org/10.1353/asp.2024.a918871

spurred domestic efforts to innovate, including the development of homegrown semiconductors, algorithmic optimisation, and cloud computing solutions to circumvent computing limitations. Additionally, cooperation with Global South partners may offer opportunities for China to access embargoed chips. For example, it is alleged that some of DeepSeek's Nvidia chips were procured through companies based in Vietnam and Singapore.

China's AI cooperation with the Global South, particularly in Southeast Asia, the Middle East, and Africa, has largely been carried out as part of the Digital Silk Road (DSR), an initiative launched in 2015. This initiative sees active involvement from major Chinese tech giants, including Alibaba, Tencent, and ByteDance. The domestic economic slowdown and growing challenges encountered in Western markets have further accelerated these companies' efforts to strengthen their foothold in the South, where markets are less saturated, new customer bases are expanding, and new revenue streams are emerging.

While initiatives to collaborate with the Global South are often portrayed negatively in the West, the underlying dynamics are more complex and nuanced. Many countries in the Global South, shaped by the extensive and often devastating impacts of colonialism, place a strong emphasis on independence and sovereignty in their foreign policy doctrines.[89] As a result, their policies prioritise "non-alignment, strategic autonomy, and collaboration with Global South countries".[90] Consequently, it is unlikely that China, or any other country, will easily achieve dominance in the South, as these nations are committed to protecting their right to make independent decisions. Nevertheless, many of these countries are also seeking emerging technologies to drive economic growth, often relying on Chinese hardware and American software to meet their needs.[91] China's proposals at the global level, particularly those advocating for capacity building and leveraging AI for economic development, are gaining traction among countries in the Global South.

These pull and push factors collectively propel China's rapid expansion in the Global South's AI landscape. ASEAN, as a burgeoning tech market, has become a key focus of China's efforts

[89] Gomez, M. (March 2024). Counterpoint Southeast Asia - Will ASEAN Seek Alignment or Independence When Pursuing Emergent Technologies? Centre on Asia and Globalization. Retrieved from: https://lkyspp.nus.edu.sg/docs/default-source/default-document-library/csa10_miguelgomez.pdf?sfvrsn=bbff380a_0

[90] Ibid, p. 8.

[91] Ibid, p. 9.

to extend its digital and technological prowess. China and ASEAN's AI-related cooperation spans areas such as smart cities, 5G, talent training, e-commerce, and data centre infrastructure.[92] At the 27th ASEAN-China Summit in Laos, Premier Li Qiang reaffirmed China's commitment to implementing the "S&T Capacity Enhancing Initiative of AI Empowering Development for ASEAN".[93]

Chinese companies, including Alibaba, Tencent, Huawei and SenseTime, have established a prominent profile in Southeast Asia, especially in Singapore and Indonesia. For instance, Alibaba and Tencent have set up regional offices and research laboratories in Singapore, teaming up with local tech companies to tap into the region's booming online markets. In Indonesia, Tencent co-founded MNC Tencent in 2013 with MNC Media, Indonesia's leading media conglomerate, to expand WeChat's footprint.[94] Similarly, JD.com and Alibaba entered joint ventures with local companies in 2017 to co-found Indonesia's Traveloka, an online ticket booking platform, and Tokopedia, a C2C e-commerce platform. Research collaboration has also expanded, including joint research initiatives between the China Academy of Information and Communications and the University of Malaya, as well as between the China Academy of Sciences and Chulalongkorn University.

China-ASEAN AI cooperation has been institutionalised, with Guangxi province playing a principal role. Events such as the China-ASEAN AI Summit (2019-), China-ASEAN Information Harbor (2015-), and the Forum on China-ASEAN Technology Transfer and Collaborative Innovation (2012-) have been hosted in Nanning, Guangxi's capital, promoting government-led collaboration on AI.

Similarly, if to a lesser extent, Chinese companies such as ZTE, Alibaba and Huawei have made significant investments in digital backbone infrastructure across Africa and the Middle East, both within and outside the DSR framework. In Africa, Huawei invested $14.5 billion in

[92] Zhang, 2024, *To Win the Great AI Race, China Turns to Southeast Asia*.
[93] Ministry of Foreign Affairs. (10 October 2024). Address by H.E. Li Qiang Premier of the State Council of the People's Republic of China at the 27th China-ASEAN Summit. Retrieved from: https://www.mfa.gov.cn/eng/xw/zyxw/202410/t20241010_11504896.html
[94] Lukman, E. (28 February 2013). Tencent Opens Joint-Venture Company in Indonesia, WeChat App Sees Explosive Growth. TechInAsia. Retrieved from: https://www.techinasia.com/tencent-joint-venture-indonesia-mnc-media

the development of Konza Technopolis, a "smart city" in Kenya.[95] Further, the Chinese and African governments have pledged to advance high-quality Belt and Road initiatives, including the Belt and Road Science, Technology and Innovation Cooperation Action Plan, the China-Africa Innovation Cooperation Centre, and the China-Africa Innovation Cooperation and Development Forum, to foster closer collaboration on 5G, big data, cloud computing, fintech, and AI.[96]

Likewise in the Middle East, Saudi Arabia and the UAE have partnered with Huawei and Alibaba to build tech infrastructure, ranging from 5G networks, smart city applications, to data centres. In September 2023, Huawei announced a $400 million investment to build a new "cloud region" in Saudi Arabia, designed to support government services and AI applications. China's tech companies, such as Lenovo, ZTE, Baidu, Tencent, Alibaba, Huawei and JD.com, have also strengthened their ties with research institutes and companies in the region, including UAE's leading AI company, G42.[97] However, the US has exerted pressure on the UAE and Saudi Arabia to reduce ties with China, citing concerns about giving Chinese rivals access to sensitive US technologies, although it remains unclear whether a complete decoupling is possible.[98]

On the multilateral stage, China has sought to advance AI collaboration within BRICS to maintain strong global connections, although progress may be hindered by India's stance. In August 2023, at the BRICS summit in Johannesburg, China initiated the creation of an "AI study group" aimed at accelerating innovation and collaboration in AI among BRICS countries.[99] In July 2024, China launched the China-BRICS AI Development and Cooperation Centre, holding its first expert committee meeting in September 2024. Attended by officials from MIIT and prominent experts in AI policymaking such as Xue Lan from Tsinghua

[95] Microsoft AI deal with UAE's G42 at risk over national security fears. (2 July 2024). Bloomberg. Retrieved from: https://www.bloomberg.com/news/articles/2024-07-02/microsoft-ai-deal-with-uae-s-g42-at-risk-over-national-security-fears?embedded-checkout=true

[96] Ouyang, S. (30 August 2024). China to advance high-quality Belt-and-Road initiatives with Africa. China Daily. Retrieved from: https://www.chinadaily.com.cn/a/202408/30/WS66d10227a31060630b925b73.html

[97] Shaoul, J. (26 August 2024). The Middle East arena of competition between the US and China. World Socialist. https://www.wsws.org/en/articles/2024/08/26/vnvf-a26.html

[98] Ibid.

[99] BRICS announces formation of AI study group. (23 Aug 2023). Digwatch. Retrieved from: https://dig.watch/updates/brics-members-announce-formation-of-ai-study-group

University's Artificial Intelligence International Governance Institute, the centre focuses on joint research, talent training, and the sharing of best practices, "in the spirit of open and inclusive cooperation".[100]

The Shanghai Cooperation Organisation (SCO) has also touched on AI collaboration, albeit limited progress has been made, possibly due to the ongoing Russia-Ukraine war and the primary organisation's focus on combating the "three evils" – cross-border terrorism, extremism, and separatism. The Astana Declaration of the SCO Council of Heads of State, signed in July 2024, was the first document to explicitly address AI, expressing member states' willingness to "work together to prevent risks in order to continuously improve the safety, accountability, reliability, trustworthiness and fairness of artificial intelligence technologies for the benefit of all mankind". The declaration also highlighted the potential for AI to contribute to a "creative economy".[101] A more recent SCO Joint Communique, adopted in Islamabad in October 2024, briefly acknowledged AI as one of the "tectonic shifts" in the global economy, pledging to deepen cooperation to "counter protectionist trade measures".[102]

Alongside these regional and multilateral initiatives, China is likely to intensify efforts to develop its homegrown initiatives. Since around 2014, events such as the World Artificial Intelligence Conference in Shanghai, the World Robot Conference in Beijing, the Global AI Forum in Hong Kong, and the World Internet Conference in Wuzhen have been organised annually. Notably, at the latest World Internet Conference in November 2024, the CAC introduced a new AI Specialised Committee, comprising 170 members, including European experts and representatives from prominent Western and Chinese companies such as IBM, SAP, Cisco, JD.com, iFlytek, Ant Group (Alibaba), Sina, China Telecom and China Unicom.

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[100] Promoting Global AI Cooperation: Convening the first meeting of the BRICS Center for Artificial Intelligence Development and Cooperation. [推动全球AI合作：金砖国家人工智能发展与合作中心首次会议召开]. (11 September 2024). SOHU. Retrieved from: https://www.sohu.com/a/808139328_121798711

[101] SCO countries to work on preventing AI risks. (4 July 2024). TASS. Retrieved from: https://tass.com/world/1812493

[102] Ministry of Foreign Affairs of Pakistan. (16 October 2024). Joint Communique of the Twenty-third Meeting of the Council of Heads of Government of Member States of the Shanghai Cooperation Organization. Retrieved from: https://mofa.gov.pk/press-releases/joint-communique-of-the-twenty-third-meeting-of-the-council-of-heads-of-government-of-member-states-of-the-shanghai-cooperation-organization

This Committee aims to establish standards and security protocols for AI development, though its specific agenda and strategies have yet to be clarified. The initiative aligns with China's broader efforts to promote Chinese technologies and to ensure that future international regulations on emerging technologies are sympathetic to its values and interests.[103]

Although these homegrown initiatives represent positive steps for China to proactively engage with the global community, the effectiveness of projecting Chinese views and interests through such grandiose international conferences is not guaranteed. For instance, the latest World Internet Conference and World Artificial Intelligence Conference saw limited high-level participation from Western countries. That being said, these initiatives, by bringing together a wide array of governments, international organisations, and industry leaders, may continue to offer important opportunities for business engagement and international dialogue on best practices.

[103] GLOBALink | Advanced AI technologies displayed at World AI Conference. (9 July 2021). Xinhua News. Retrieved from: http://www.xinhuanet.com/english/2021-07/09/c_1310051876.htm
Wang, Y. & Shi, J. (5 July 2024). Shanghai sees moves to make AI benefit all. China Daily. Retrieved from: https://www.chinadaily.com.cn/a/202407/05/WS668744f9a31095c51c50c73e.html

Conclusion

As an emergent sphere of global governance, AI presents both opportunities and challenges. This report aims to assist policymakers in understanding China's international behaviour, identifying potential opportunities for collaboration, and highlighting areas that warrant further research.

First, to better grasp China's approach to AI on the global stage, two important aspects should be considered. First, China's ambitious international AI agenda is closely linked to its domestic priorities. Nationally, China's AI policy can be characterised as "prudent but accommodative", balancing economic growth with a targeted, ad hoc regulatory approach to managing security risks. Much of its AI policy is still in its early stages, but economic growth and facilitation remains a central focus.

Second, China's international AI policy reflects both its ambition to shape global AI governance in ways that support its technological development and its concern over potential isolation from the global economic and technological landscape. As geopolitical tensions contribute to the fragmentation of the world economy into competing blocs, China seeks to secure its position within the evolving AI ecosystem. Therefore, when assessing China's AI policy, foreign policymakers should recognise both its strategic aspirations and the underlying threat perception that informs its approach. While responding to China's AI ambitions and striving to maintain their own competitive edge, policymakers should also consider how their actions may reinforce China's sense of threat, necessitating a careful balance between preserving technological advantages and avoiding unnecessary escalations.

Third, this report has demonstrated that China's AI development and policymaking landscape is highly diverse and contested, despite the dominant role of the government and the Chinese Communist Party in ensuring national security and regime stability. Analysing the decision-making processes reveals that various Chinese actors—including ministries, regional governments, companies, think tanks and universities—often have differing, even competing interests. While state actors play a central guiding and coordinating role, non-state actors remain actively involved throughout all phases of policymaking and should not be overlooked. AI decision-making in China may increasingly follow a multistakeholder

approach. For instance, the AI Security Governance Committee, established under the Cyberspace Administration of China in 2023, brings together a broad spectrum of stakeholders from 58 organisations across various sectors. Such bodies warrant closer attention, and further efforts could be made to explore dialogue and engagement with similar institutions to better understand China's AI governance dynamics.

Fourth, China recognises both the importance and challenges of global AI governance, engaging in a broad spectrum of issues—from autonomous weapons and technical standards to ethics, education, and human rights. This breadth of involvement presents opportunities for cooperation, but a pragmatic approach is essential, focusing on areas where meaningful engagement is feasible. AI governance offers a key avenue for dialogue and sharing of best practices, particularly in algorithmic transparency, bias mitigation, and regulatory frameworks. Policymakers can also foster discussions on AI ethics to build mutual understanding, acknowledging both shared concerns and differing perspectives on issues such as privacy, surveillance and digital rights.

Similarly, regarding technical standards, there is potential for coordination to ensure safety (and in some cases interoperability) in AI applications where mutual interests align. While proprietary technology transfers may face geopolitical constraints in the near future, this should not preclude knowledge sharing and research exchanges based on open-source models. In the hard security domain, mechanisms should be established for crisis communication and risk mitigation to prevent unintended escalations, particularly in military AI applications. Strategic dialogue is also essential to address the risks associated with AI in nuclear command-and-control systems, ensuring adherence to global stability norms. While competition in certain areas is inevitable, it should not preclude cooperation in others. Identifying and reinforcing areas of shared interest can help maintain a degree of engagement that fosters stability, reduces misunderstandings, and creates pathways for constructive AI governance between China and Europe.

Finally, as China sees countries in the Global South as a major opportunity, it is necessary to further investigate and examine these dynamics. Engagement with and business opportunities in the Global South are prioritised through various initiatives, fora and collaborations. As current trends, in for example export bans, continue to isolate China from the West, China's orientation on the Global South will only consolidate. Any analysis should

incorporate more perspectives from the Global South itself and factor in its diverse responses to technology competition and developments in global AI governance.