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# GLOBAL STRATEGIC STUDIES

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# Neither Cold nor Hot: Western States' Defensive Response to the Hybrid Warfare Threat

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*This article is interested in hybrid warfare and states' defensive policy responses from a Western perspective. Hybrid warfare has become a critical component of contemporary interstate conflicts, deliberately narrowing the gap between conventional military engagements and grey zone operations. It combines military tactics with non-military tools, such as cyber operations, disinformation campaigns, and economic coercion, to weaken adversaries without engaging in conventional warfare. Russia's War in Ukraine illustrates the use of hybrid warfare to achieve imperialist objectives, while similar campaigns have targeted other Western democracies. China's actions in the Indo-Pacific reflect comparable hybrid strategies. While much attention has focused on its offensive use, less is known about how states respond defensively. This paper explores how Australia, New Zealand, the United Kingdom, Canada, the United States, and Finland respond to hybrid threats. It argues that Western policy responses are uneven, with some states better prepared than others. Effective defense requires a clear definition of hybrid warfare, a comprehensive approach, and sustained resources. Based on publicly available policy documents, this comparative case study assesses how national interests are protected, despite research limitations due to the classified nature of hybrid operations.*

***Keywords:*** *hybrid warfare, grey-zone, military, civilian, transparency, foreign interference*

## Introduction

In the last two decades, we have witnessed a fundamental shift in interstate conflict, moving away from clearly defined military confrontations toward ambiguous engagements between war and peace situated within the grey zone. At the forefront of this transformation lies hybrid warfare, a deliberate and strategic approach employed by states to weaken and undermine their adversaries without providing a clear *casus belli*.

Hybrid warfare achieves this by seamlessly integrating conventional military tactics with non-military tools, such as cyber operations, disinformation campaigns, and economic coercion. This hybrid approach has become a pivotal component of contemporary interstate conflicts, with states worldwide adopting it as a strategic tool. The conceptual foundations of hybrid warfare are traced to Frank Hoffman, whose work synthesized several earlier strands of thinking on modern conflict (Fridman, 2018; Nasu, 2019; Wegge & Wetzling, 2020). Drawing on four earlier works: Thomas Hammes and William Lind's fourth-generation warfare concept, Thomas Huber's Compound Wars, Qiao Liang and Wang Xiangsui's Unrestricted Warfare, and the U.S. National Defense Strategy of 2005, Hoffman (2007) defined hybrid warfare as the combined use of conventional and unconventional strategies and tactics by state or non-state actors to achieve synergistic effects on the battlefield. A key feature of hybrid warfare is its deliberate creation of ambiguity, blurring the lines between war and peace. While the concept has since evolved, particularly following Russia's 2014 invasion of Crimea, Hoffman's framework remains central to ongoing debates about the nature of contemporary conflict and continues to inform how hybrid threats are analyzed (Fridman, 2018). Russia's war in Ukraine serves as a vivid example of how hybrid warfare is being employed to advance imperialist foreign policy objectives. Similar tactics have also been adopted by other state actors, notably China, whose activities in the Indo-Pacific underscore the strategy's expanding global significance. While the offensive use of hybrid warfare is increasingly documented, the understanding of how states' foreign and defense policies have evolved in response remains limited.

In this article, we study Western states' responses to hybrid warfare by comparing their conceptual understanding of hybrid threats, the clarity of their legislative frameworks, and the comprehensiveness of their governmental structures and policies. Our analysis specifically examines how six Western democracies, Canada, Australia, New Zealand, the United Kingdom, the United States, and Finland have responded to the challenges posed by hybrid warfare, focusing on the Five Eyes member states for their shared security interests and Finland for its proximity to Russia. Hybrid warfare represents a multifaceted threat that compels states to develop a comprehensive, targeted and strategic approach (Aoi et al., 2018). We argue that although hybrid warfare is widely acknowledged as a significant security challenge across our case studies, there remain significant variations in their response, with some countries notably better prepared than others.

To develop this argument, the rest of the article is organized in four sections. The first section reviews recent scholarship on hybrid warfare, situating our study within broader debates on the nature of contemporary hybrid warfare. The second section presents the study's methodology and identifies the indicators for the analysis. Third, the results across the six states are presented. Finally, the conclusion draws together our findings with a discussion highlighting key policy gaps, strengths, and opportunities for improvement against the evolving nature of hybrid warfare.

## On Hybrid Warfare

The concept of hybrid warfare is now broadly recognized, though it remains hotly debated. Frank Hoffman (2007) is acknowledged as the first scholar to have conceptualized the term (Fridman, 2018; Nasu, 2019; Wegge & Wetzling, 2020). Hoffman (2007) defined hybrid warfare as the deliberate combination of conventional and unconventional strategies and tactics by state or non-state actors to create ambiguity and achieve synergistic effects on the battlefield. His framework remains important for understanding the evolving nature of hybrid threats, particularly the interplay between military, technological, and political tools (Fridman, 2018; Wegge & Wetzling, 2020). While Hoffman (2007) drew on cases such as the 2006 Lebanon War to illustrate hybrid tactics, where Hezbollah combined conventional and unconventional operations with advanced technologies to challenge the Israeli Defense Force, the concept has evolved considerably, particularly in response to state-level applications. Russia's actions in Crimea in 2014 are usually understood as the first successful state-level application of hybrid warfare, combining covert military operations, cyberattacks, economic coercion, espionage, and sophisticated disinformation campaigns (Aoi et al., 2018; Bowers, 2018; Ito, 2022; Jackson, 2019). These tactics created operational ambiguity and plausible deniability, complicating responses and countermeasures (Briggs & Matejova, 2023; Stănescu, 2023). Thompson (2022) notably characterizes Russia's strategy as forcing states into accepting a new geopolitical reality through carefully managed perceptions and strategic ambiguity.

Despite consensus on Crimea's importance, scholarly debates persist about precisely defining hybrid warfare. NATO's definition emphasizes a combination of military and non-military methods employed covertly or overtly by state and non-state actors (Bowers, 2018; Carment & Belo, 2018; NATO, 2024). This description resonates strongly with Russia's operations in Crimea. However, some academics argue for definitions that require significant conventional military engagement alongside unconventional strategies, referencing earlier conflicts like Hezbollah's tactics during the 2006 Lebanon War (Lanoszka, 2016). Conversely, contemporary analyses increasingly emphasize the strategic dominance of non-military elements. Scholars like Thompson (2022) suggest a deliberate preference by states such as Russia and China to achieve political objectives without overt military escalation, highlighting hybrid warfare's inherent flexibility and context-dependent nature (Aoi et al., 2018; Bowers, 2018).

Technological advancements have also significantly reshaped contemporary hybrid warfare, with cyber operations and influence campaigns becoming central to its strategy. Scholars emphasize how digital platforms amplify hybrid warfare's decentralized and non-linear characteristics, enabling state actors to exploit societal vulnerabilities and undermine political cohesion without triggering conventional military responses (Fridman, 2018; Paterson, 2020; Stănescu, 2023). Russia's strategic success in Crimea emphasized the need for enhancing state preparedness, advocating comprehensive policies that integrate traditional military preparedness with robust cybersecurity, economic resilience, and strategic communication capabilities (Rausta & Monaghan, 2021; Wegge & Wetzling, 2020).

Contemporary conceptualizations emphasize hybrid warfare's strategic position within legal and operational grey zones, focusing on the manipulation of perceptions and misinformation campaigns that avoid crossing established thresholds of war (Boucher, 2018; Briggs & Matejova, 2023). Briggs and Matejova (2023) specifically align this approach with the Russian concepts of *maskirovka* and *gibridnaya voyna*, underscoring the strategic manipulation integral to these tactics. Nasu (2019) elaborates that hybrid warfare occupies a space between diplomatic measures and outright military confrontation, utilizing centralized state resources and strategic planning to destabilize opponents internally through legal, informational, and economic methods (Burkle et al., 2022; Carment & Belo, 2018; Granholm et al., 2022). Democratic states face unique vulnerabilities in countering hybrid warfare, particularly due to constitutional protections of free speech and decentralized bureaucratic decision-making, which adversaries effectively exploit through disinformation and influence operations (Ito, 2022; Paterson & Hanley, 2020). Economic strategies also constitute a core component of hybrid warfare, as states leverage financial and infrastructural tools to achieve strategic objectives while avoiding direct military confrontation. For example, China's Belt and Road Initiative and strategic 5G deployments exemplify efforts to expand influence and set international standards advantageous to its strategic objectives (Chung, 2021; Ito, 2022). Likewise, Russia's manipulation of energy supplies demonstrates economic resources' strategic weaponization to exert political pressure on European states (Aoi et al., 2018; Briggs & Matejova, 2023). In both cases, these economic measures exemplify the hybrid warfare strategy of combining conventional and unconventional tactics to create ambiguity, influence perceptions, and advance state interests without triggering open conflict.

Additionally, regional scholarly perspectives shape differing understandings of and perceived threats posed by hybrid warfare. Western literature primarily explores Russian hybrid threats against Europe and North America, highlighting cyber interference, economic pressure, and targeted disinformation campaigns such as those seen during the 2016 U.S. election and the UK's Brexit (Burkle et al., 2022; Janicatova & Mlejnkova, 2021; Paterson & Hanley, 2020). Conversely, Asia-Pacific literature emphasizes China's hybrid operations characterized by maritime disputes, strategic naval expansions, and the deployment of maritime militias disguised as civilian entities to blur the lines of international response capabilities (Aoi & Heng, 2021; Chung, 2021; Ito, 2022; Ong, 2018). North Korea represents a unique regional actor employing asymmetric hybrid methods, including cyberattacks and state-sponsored criminal activities, to compensate for its conventional military disadvantages (Bowers, 2018). Despite its adoption, the concept of hybrid warfare faces criticism regarding its definitional vagueness, and potential overgeneralization. Critics highlight that hybrid tactics such as psychological operations and irregular warfare have historical precedents. Nevertheless, contemporary digital platforms and operational integration distinguish current hybrid practices significantly, marking a clear evolution from historical forms of warfare (Briggs & Matejova, 2023; Jackson, 2019; Murray & Mansoor, 2012).

The ongoing Russo-Ukrainian conflict underscores significant shifts in hybrid warfare practices and illuminate important gaps in the scholarly literature. One such prominent gap is the limited comparative analysis of how democratic states develop policies to counter hybrid threats effectively. This comparative perspective is essential to understanding policy strengths and weaknesses among targeted nations. Addressing this deficiency, this study comparatively analyzes hybrid warfare responses by Canada, Australia, New Zealand, the United Kingdom, the United States, and Finland, providing insights into diverse national policy approaches and identifying best practices of countering hybrid warfare activities. Ultimately, this analysis aims to bridge notable gaps in academic understanding and policy formulation, enhancing the collective preparedness of democratic states confronting hybrid warfare threats.

## Research Method

This study employs a qualitative, multiple-case study design, with each state serving as the unit of analysis (Yin, 2018). This methodology is suitable for examining the complex challenges posed by hybrid warfare, where the boundaries between the issue and its broader political and institutional context are often blurred (Ibid.). A cross-case synthesis approach is applied to this analysis, which allows for comparison between states while also highlighting the key differences in their policies countering hybrid warfare (Ibid.). Through this comparative framework, this study aims to discern recurring patterns and divergences in national policy, underscoring both common strategies and country-specific approaches. To achieve this, this research draws on evidence primarily in the form of official government documentation such as national government policies, legislative documents, and institutional mandates and statements. To evaluate state responses to hybrid warfare, this study applies six standardized features that ground the fluid concept of hybrid warfare policy into clear and observable indicators, thereby allowing systematic evidence gathering and comparative analysis.

The first indicator assesses whether a state explicitly defines hybrid threats in its strategic documents, which is essential for guiding coherent policy action. The second examines whether legislative instruments have been enacted or updated to address hybrid threats, including cybercrime, disinformation, and foreign interference. The third looks at institutional responsibility by identifying which agencies or interdepartmental bodies are tasked with leading and coordinating hybrid warfare responses. The fourth reviews the existence and scope of national strategies or policy frameworks specifically aimed at countering hybrid threats. The fifth considers whether states acknowledge or develop offensive capabilities, such as active cyber operations, as part of their national security posture. The sixth and final indicator evaluates transparency and public communication, particularly the extent to which governments disclose hybrid threats and responses to build public resilience. Together, these indicators provide an original analytic framework built on established methodology, adapted to comparing hybrid warfare readiness across jurisdictions. Following the collection and analysis of official government documents, legislative texts, and departmental statements, several key themes emerge in how the selected states conceptualize and address hybrid warfare.

## Government Policies and Results

Across Canada, Australia, New Zealand, the United Kingdom, the United States, and Finland, hybrid warfare is broadly understood as a multifaceted threat that

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integrates both conventional and unconventional military and non-military tactics. Definitions vary but consistently recognize the roles of both state and non-state actors, with countries such as Russia, China, and Iran frequently identified as primary sources of hybrid threats. Legislative responses predominantly target cyber threats, disinformation, and foreign interference; however, the scope, depth, and specificity of these measures differ notably among states. Institutionally, countries demonstrate diverse strategic emphases, ranging from civilian-led approaches to reliance on military and intelligence agencies. Differences also exist in interdepartmental coordination and transparency, reflecting national priorities, political systems, and threat perceptions. The table below outlines key findings as categorized by the six standardized indicators.

| | Finland | United States | United Kingdom | New Zealand | Australia | Canada |
|---|---|---|---|---|---|---|
| **Indicator 1**<br>How does the country define hybrid warfare, or a synonymous concept? | Defines hybrid threats as systematic state-led strategies combining multiple methods (Ministry of the Interior, 2025).<br>State actors: Russia and China (Finnish Security and Intelligence Service, 2024; 2025a). | Hybrid warfare defined as integrated gray-zone activities alongside conventional military actions. (National Intelligence Council, 2024).<br>State actors: Russia, China, Iran, and North Korea (U.S. Department of Homeland Security, 2023; National Intelligence Council, 2024b, 7). | Hybrid warfare defined as multiple synchronized instruments targeting vulnerabilities, notably emphasizing cognitive operations (Multinational Capability Development Campaign, 2019, 13).<br>State actors: China and Russia (Ministry of Defence, 2023). | Hybrid threats defined as combined military, covert, and overt non-military actions (National Cyber Security Centre, 2022, 23).<br>State actors: China and Russia (Department of the Prime Minister and Cabinet, 2023). | Hybrid warfare defined as blending conventional, cyber, and irregular tactics. (The Senate, 2023, 3).<br>State Actors: China, Russia, and Iran (*Ibid*.). | Hybrid warfare defined as coordinated diplomatic, informational, cyber, military, and economic tactics (Department of National Defence, 2017, 53).<br>State actors: China, India, Russia, North Korea (Canadian Centre for Cyber Security, 2024). |
| **Indicator 2**<br>How does the country address the issue of hybrid warfare and its related operations in their legislation? | *Border Guard Act* and *Cyber Resilience Act* (Ministry of Justice, 2018; Ministry of the Interior, 2025d; National Cyber Security Centre Finland, 2025; European Commission, 2025). | *FARA*, *Gray Zone Defense Act*, and related bills (U.S. Department of Justice, 2024; United States Congress, 2023; 2019; 2022; 2024a; 2024b). | *National Security Act 2023* (UK Legislature, 2024). | *Crimes Act 1961* (Ministry of Justice, 2025) | *Autonomous Sanctions Act*, *Criminal Code,* and *Espionage and Foreign Interference Act* (The Senate, 2023) | *An Act respecting countering foreign interference*, and *Foreign Influence Transparency Act* (Public Safety Canada, 2024b; 2024j; Department of Justice Canada, 2025). |
| **Indicator 3**<br>Which government agencies and departments are primarily responsible for addressing hybrid warfare? | Ministry of Defence<br>Ministry for Foreign Affairs<br>Ministry of Education and Culture<br>Ministry of the Interior | Department of Defense<br>U.S. Department of Justice<br>Department of Homeland Security. | Ministry of Defence<br>Secretary of State for the Home Department<br>Secretary of State for Foreign, Commonwealth and Development Affairs | Ministry of Defence<br>Government Communications Security Bureau<br>Department of the Prime Minister and Cabinet<br>Ministry for Ethnic Communities<br>Ministry of Justice | Department of Defence<br>Department of Home Affairs<br>Attorney General's Department* | Department of National Defence<br>Public Safety Canada |

| | Finland | United States | United Kingdom | New Zealand | Australia | Canada |
|---|---|---|---|---|---|---|
| **Indicator 4** How do these government agencies and departments counter hybrid warfare and its related operations in their policies? | The Finnish Defence Forces prepare for hybrid threats, while the ministries of Foreign Affairs, Education and Culture, and Interior collaborate on cybersecurity, media literacy, and counterintelligence (Ministry of Defence, 2024; Ministry for Foreign Affairs, 2025a; 2025b; Ministry of the Interior, 2025; SUPO, 2024). Civil agencies cooperate, but no civil–military coordination noted. | DoD handles hybrid warfare worldwide, including cyber and information ops (U.S. Special Operations Command, 2023; U.S. Army Cyber Command, 2025). Civilian agencies (DoJ, DHS, FBI, CISA) investigate foreign interference and strengthen infrastructure (U.S. Department of Justice, 2019; 2021; 2023; U.S. Department of Homeland Security, 2021; 2023). Civil–military cooperation noted (NSA, 2022). | The British Armed Forces monitor grey-zone developments; the National Cyber Force counters cyber and hybrid threats (Ministry of Defence, 2023; National Cyber Force, 2025). Civil agencies (Home Office, MI5, GCHQ, MI6) target foreign influence, espionage, and disinformation (Home Office, 2024a; MI5, 2025; National Cyber Security Centre, 2023; 2024), but no civil–military cooperation is evident. | The NZDF trains special operations to handle hybrid warfare and information warfare (NZDF, 2017; 2023). Civilian agencies, GCSB's National Cyber Security Centre, NZSIS, and the Ministry for Ethnic Communities, tackle cyber threats and foreign interference, with cooperation among them (Ministry for Ethnic Communities, 2024; NZ Security Intelligence Service, 2025), but no civil–military collaboration noted. | The ADF counters grey-zone threats with enhanced capabilities (Ministry of Defence, 2020; Australian Army, 2025), and the Australian Signals Directorate handles signals intelligence and cyber operations (Australian Signals Directorate, 2022; 2025). Civil agencies (e.g., Home Affairs, AFP, ASIO's CFI Taskforce) tackle foreign interference, but no civil–military collaboration noted (Attorney General's Department, 2024). | DND counters hybrid threats through the CAF, CANSOFCOM, and CSE (Department of National Defence, 2017; Canadian Armed Forces, 2025; CANSOFCOM, 2020; CSE, 2023). Public Safety's CSIS and RCMP investigate foreign interference (National Security and Intelligence Committee of Parliamentarians, 2024a). Civil-military cooperation noted (Canadian Armed Forces, 2025). |
| **Indicator 5** How does the government engage in hybrid warfare? | Finland does not have a publicly declared hybrid warfare policy. There is no official documentation confirming government engagement in hybrid warfare operations. | The United States does not frame hybrid warfare as an official policy. However, USSOCOM, cyber command, and psychological operations units routinely engage in activities associated with hybrid warfare. | The United Kingdom does not have a publicly available hybrid warfare policy. Nonetheless, its military may conduct hybrid-related activities through psychological operations units (Ministry of Defence, 2021). | New Zealand has not issued any official documents indicating the existence of a hybrid warfare policy. Public sources do not confirm government-led hybrid operations. | Australia does not officially recognize hybrid warfare as a policy in public documents. However, the Australian Army's Intelligence Corps and the Australian Signals Directorate can conduct offensive cyber and hybrid warfare operations (Australian Army, 2025; Australian Signals Directorate, 2022; 2025). | Canada does not have a publicly declared hybrid warfare policy. However, the Canadian Armed Forces and CANSOFCOM engage in cyber and psychological operations that reflect hybrid warfare activities (Canadian Armed Forces, 2025; Canadian Army, 2025; CANSOFCOM, 2020). Additionally, CSE is authorised to conduct active cyber operations under government direction (CSE, 2023). |
| **Indicator 6** How does the government engage in transparency and accountability relative to hybrid warfare? | Outside of publicly available defence reports, no official communications to the public were found. However, the Finnish Border Guard (2025a), Ministry of the Interior (2025a; 2025c; 2025d), and SUPO (2024) communicate to the public on hybrid warfare and related countermeasures. | Outside of publicly available defence reports, no official communications to the public were found. | Outside of publicly available defence reports, no official communications to the public were found. The government has communicated on initiatives like the Foreign Influence Registration Scheme, and different departments have disclosed some of their activities related to countering hybrid | Outside of publicly available defence reports, no official communications to the public were found. The government has communicated on initiatives like the Foreign Influence Transparency Scheme, and different departments have disclosed some of their activities related to countering hybrid | Outside of publicly available defence reports, no official communications to the public were found. The government has communicated on initiatives like the Foreign Influence Transparency Scheme, and different departments have disclosed some of their activities related to countering hybrid threats. | Outside of publicly available defence reports, no official military communications to the public were found. The government has communicated on initiatives like the Foreign Influence Transparency Scheme, and different departments have disclosed some of their activities related to countering hybrid |

The results reveal a notable divergence in how Western democracies confront the growing challenge of hybrid warfare. Responses range from fragmented, siloed efforts to integrated national strategies that weave together civil, military, and legislative dimensions. At one end of this spectrum is Canada, which clearly identifies hybrid warfare as a complex combination of diplomatic, informational, cyber, military, and economic tactics (Department of National Defence, 2017). Yet despite this recognition, Canada's approach remains fragmented and lacks overall strategic cohesion. The Canadian Armed Forces and Communications Security Establishment focus on cyber and disinformation threats, while Public Safety Canada and its agencies address foreign interference through instruments like the Foreign Influence Transparency and Accountability Act. Each agency tends to operate independently, with seemingly limited coordination among them (Public Safety Canada, 2024f, 2024j; Communications Security Establishment, 2023).

New Zealand reflects a similar pattern of compartmentalized action. While it defines hybrid threats as the confluence of military and non-military tools, it relies heavily on specialized bodies such as the Government Communications Security Bureau's National Cyber Security Centre and the Ministry of Justice (National Cyber Security Centre, 2022; Ministry of Justice, 2025). Cooperation exists, but efforts lack cohesion and coordination across institutions (Department of the Prime Minister and Cabinet, 2023). Australia takes a modest step forward, explicitly defining hybrid warfare as a blend of conventional and irregular tactics. It has invested in enhancing both military capabilities and interagency mechanisms, with organizations like the Australian Signals Directorate and the Australian Defence Force assuming prominent roles (Department of Defence, 2024; Australian Signals Directorate, 2022). However, the absence of a centralized national doctrine weakens the overall coherence of its response, as responsibilities remain distributed among multiple civilian bodies (Justice and Community Safety Directorate, 2024).

The United Kingdom also demonstrates strong institutional capabilities, particularly through its intelligence and cybersecurity agencies, including MI5 and the National Cyber Force. Hybrid warfare is understood as the orchestration of multiple instruments against societal vulnerabilities (Ministry of Defence, 2023). Yet, in the absence of a unified doctrine, its approach remains somewhat opaque to the public and fragmented across departments (Home Office, 2024a; UK Legislature, 2024).

Further along the spectrum, the United States demonstrates a more mature response framework. Hybrid threats are addressed in legislation such as the Gray Zone Defense Assessment Act, providing a legislative anchor for a more holistic approach (United States Congress, 2023). While some decentralization persists, key institutions, including the Department of Defense, Department of Justice, and Department of Homeland Security, coordinate efforts to confront hybrid threats with significant operational capacity and legal authority (Cybersecurity & Infrastructure Security Agency, 2025a; U.S. Department of Homeland Security, 2023).

At the far end stands Finland, whose national posture towards hybrid threats is the most cohesive and transparent of the states surveyed. Hybrid threats are not only well-defined, as systematic, state-led strategies, but are also addressed through a deeply integrated model involving military readiness, cross-ministerial cooperation, and well-established legislative scaffolding, including the Border Guard Act and Cyber Resilience Act (Finnish Security and Intelligence Service, 2024; Ministry of Defence, 2024; National Cyber Security Centre Finland, 2025). Finland further distinguishes itself through its clear public communication and education initiatives, enhancing societal resilience through openness and preparedness. Ultimately, these results depict states' preparedness from loosely connected institutional responses to more complete and integrated strategies. While all six countries recognize the gravity of hybrid threats, their readiness varies considerably, shaped by political will, legal frameworks, and the degree of coordination between civil and military sectors.

## Discussion

This section discusses the key findings from the comparative case studies, illustrating how varied state responses to hybrid warfare support the article's thesis. Despite a shared recognition of hybrid warfare as a security issue, differences in policy and legislation, and institutional structures, as noted in the results section, have led to varying levels of preparedness. This analysis builds upon the research's six indicators: conceptual definitions, legislative responses, institutional roles, identified threat actors, offensive strategies, and transparency.

### *Understandings of Hybrid Warfare and Related Concepts*

The six countries examined each define hybrid warfare differently, although all recognize it as a coordinated blend of military and non-military tactics below the threshold of conventional war, aimed at achieving political objectives. To start, Australia stands out as the only country to explicitly frame hybrid warfare as a military strategy. The Australian Defence Force has identified it as a critical threat, prompting investment in military capabilities. However, this military-centric view contrasts with historical examples like Russia's 2014 invasion of Crimea, where non-military tools played a central role (Rausta & Monaghan, 2021; Thompson, 2022; Wegge & Wetzling, 2020). Scholars caution that hybrid warfare should not be confined to military or civilian domains, as such binaries may hinder comprehensive responses (Wegge & Wetzling, 2020). This highlights how states diverge in their framing of hybrid warfare, which affects their broader policy decisions in countering hybrid activities.

Conceptual differences directly shape how each state builds policy, legislation, and institutional structures to counter hybrid threats. Australia's militarized framing raises questions about whether it enhances or limits its response capacity. By contrast, the United Kingdom reflects a broader shift toward emphasizing non-military elements, particularly cyber and information operations, in its use of the term, though its internal definitions remain inconsistent (Janicatova & Mlejnkova, 2021). In addition, Australia is also alone in recognizing lawfare as part of hybrid warfare, aligning with Burkle et al. (2022) and Carment and Belo (2018), who note lawfare's use to disrupt internal governance through legitimate legal mechanisms. However, specific policy responses remain unclear. In turn, the absence of this recognition in other countries may suggest a gap that limits their ability to anticipate legal manipulation. In this respect, incorporating lawfare into national strategies could strengthen democratic resilience, and its absence can be understood as evidence of uneven preparedness among states' readiness to counter hybrid warfare.

Furthermore, the distinction between foreign interference and foreign influence, made only by Australia and New Zealand, represents another point of conceptual divergence. The two Pacific countries define interference as malicious and influence as potentially benign if transparent. Other states use the terms interchangeably, which blurs the lines between legitimate diplomacy and covert manipulation. In practice, adopting this distinction may help states craft more targeted responses. All six countries differentiate between disinformation (intentional falsehoods) and misinformation (unintentional inaccuracies). Furthermore, Canada, the United Kingdom, and the United States further recognize malinformation, the weaponized use of truthful information to mislead. Therefore, this layered approach signals an evolving approach to information threats and highlights the need for nuanced, adaptable policies. Ultimately, states that have not yet incorporated these distinctions could improve their hybrid threat responses by refining their definitions and frameworks accordingly.

### *The State Actors Responsible for Hybrid Warfare*

All six countries identified Russia and China as the primary state actors behind hybrid warfare, consistent with existing literature. Russia's record includes economic and information warfare (Briggs & Matejova, 2018; Janicatova & Mlejnkova, 2021), while China combines diplomacy and information tactics in its strategy (Chung, 2021; Ito, 2022; Ong, 2018). Iran and North Korea were also noted by several states, though not universally. North Korea, for example, uses hybrid tactics to pursue foreign policy objectives against stronger powers (Bowers, 2018). Canada uniquely identified India as a hybrid threat actor, likely in response to recent allegations of Indian interference domestically (Canadian Centre for Cyber Security, 2024). These variations reflect how national security priorities and geopolitical contexts influence each state's threat assessments. While there is consensus on major adversaries, differing views on secondary actors suggest that hybrid warfare responses are highly context-dependent, and even when states agree on the threat actors, their policy responses are shaped by the unique threats they respectively face. Additionally, all six states also acknowledged the threat posed by non-state actors, reinforcing the need for broad and adaptable hybrid warfare policies. This recognition naturally leads into a closer analysis of how states balance offensive and defensive strategies when addressing hybrid warfare.

### *Variations in the Development of Legislation*

Carment and Belo (2018) suggest that democracies often respond slowly to new threats due to decentralized decision-making and constitutional constraints. Yet, all six countries have recently introduced or are planning legislation to counter hybrid warfare, to varying levels of success. So far, the United States and Finland have passed legislation explicitly addressing hybrid threats. In 2023, the U.S. enacted a law assessing national counter-hybrid capacities, calling for stronger domestic capabilities and greater allied cooperation. Finland's legislation expands border guard powers, its only military-linked agency in this context, to address hybrid scenarios (Digital and Population Data Services Agency, 2025), reflecting its heightened security concerns due to its proximity to Russia. This approach offers a model worth examining by Australia and New Zealand, both of which have experienced Chinese naval incursions near their maritime boundaries

(Department of Defence, 2025). Australia and the United Kingdom have enacted foreign influence transparency registries to curb covert foreign interference; Canada has legislation to this effect, though it has yet to put in place a registry. The United States' Foreign Agents Registration Act of 1938 serves a similar role. These initiatives reflect a growing recognition of hybrid warfare's non-military dimensions. Legislating a polymorphous threat, however, remains challenging. In the United States, the challenge of getting legislation through Congress is evident; three other bills addressing hybrid threats have stalled in the Senate for over a year, while another failed in the House. These legislative efforts primarily target foreign interference, raising concerns about potential misuse given the ambiguity of hybrid warfare (Briggs & Matejova, 2023), especially in politically polarized environments like the U.S. post-2016. While many states still lack dedicated hybrid warfare legislation, the increasing use of hybrid warfare language in policy documents and related legislative developments signal growing institutional adaptation. As such, these legislative variations reveal differing levels of national preparedness and highlight opportunities for more cohesive and effective responses.

### *How Governments Have Addressed Hybrid Warfare*

Across all six countries, hybrid warfare is primarily addressed through civilian, non-military institutions responsible for public safety, defense, and national security. These agencies focus on specific elements, such as cyber threats, disinformation, and foreign interference, rather than hybrid warfare as a unified concept. Carment and Belo (2018) emphasize the importance of integrating responses within civil-military frameworks, especially as hybrid threats often target civilian domains. Despite their involvement, public details of these policies remain limited, with insights derived from policy documents and official statements. Coordination typically occurs through reporting lines to higher national security or defense authorities, reflecting a wide-ranging, though compartmentalized approach. While most countries run public awareness campaigns to combat disinformation, Finland stands out by embedding hybrid threat education into its curriculum, a proactive move shaped by its proximity to Russia (Stănescu, 2023). Similar long-term societal strategies could benefit other states. Ito (2022) notes how China's hybrid tactics include leveraging small businesses to exert influence, prompting some countries to develop awareness programs for vulnerable sectors. As underscored by these examples, civilian institutions are on the frontline of hybrid threat responses and often operate in parallel to military efforts to combat hybrid warfare.

As for countries' military response, defense documents across all six states recognize hybrid warfare as a strategic concern, but public articulation of military roles remains limited. In Canada, New Zealand, and the United States, special operations units reportedly handle hybrid threats, though specific policies remain classified. All states also participate in NATO-led initiatives like the Multinational Capability Development Campaign (2019), though the influence of such collaborations on national policy is unclear. Public documentation on civil-military cooperation is sparse. Canada and the U.S. indicate some coordination in cyber defense, though concrete evidence is lacking. The likely classified nature of such partnerships makes comprehensive analysis difficult. In practice, civilian agencies handle the components of hybrid warfare, while militaries take a more holistic view, identifying hybrid warfare as an overarching threat in national defense strategies.

Overall, governments have taken steps to address hybrid warfare's key components, but most policies are recent, and their effectiveness remains uncertain. The rise of foreign-supported fringe groups in the U.S. (Department of the Treasury, 2024) and the strategic use of social media by adversaries (Stănescu, 2023; Ito, 2022; Richey, 2018) reveal the societal risks posed by hybrid tactics. Russia and China, for instance, exploit internal divisions, using political systems against themselves (Chung, 2021; Stănescu, 2023), often through covert, non-military actions that offer plausible deniability (Briggs & Matejova, 2023; Rausta & Monaghan, 2021; Thompson, 2022; Wegge & Wetzling, 2020). This ambiguity complicates attribution and limits response options, often forcing target states into reactive positions (Bowers, 2018; Thompson, 2022). While national strategies are evolving, they tend to address symptoms, like cyberattacks and disinformation, rather than the strategic objectives driving hybrid threats. Without clearer definitions and proactive planning, states risk remaining vulnerable to the blurred, adaptive tactics that define hybrid warfare. This suggests that future efforts will need to focus not only on improving institutional coordination but also on addressing the underlying strategies that underpin hybrid warfare.

### *Conducting Hybrid Warfare*

Publicly available documents suggest that none of the six countries officially engage in hybrid warfare. However, both military and civilian agencies responsible for defending against hybrid threats, particularly cyber and intelligence bodies, are also equipped to conduct offensive operations if authorized. While the literature rarely addresses Western states as hybrid warfare actors, Carment and Belo (2018) argue that interventions and aid programs may constitute hybrid tactics. Similarly, Ito (2022) views China's Belt and Road Initiative (BRI) as a strategic form of hybrid engagement. Though beyond the scope of this paper, programs like Canada's Official Development Assistance and USAID might be interpreted similarly, though others may classify these efforts as soft power. This reflects broader critiques that hybrid warfare is not a novel concept, but rather a continuation of longstanding geopolitical practices (Murray & Mansoor, 2012; Lanoszka, 2016). Western and Asia-Pacific literature tends to frame Russia and China as primary adversaries, often overlooking how these states understand or operationalize hybrid warfare themselves. This omission creates a significant analytical gap, limiting insight into adversarial motivations, doctrines, and counterstrategies. A Western-centric focus risks presenting a one-sided view that does not fully capture the strategic logic or perspectives of China and Russia. Ultimately, recognizing this imbalance makes it imperative to consider adversarial perspectives more directly when evaluating Western strategies.

Additionally, this gap is especially relevant to this paper's comparative analysis of how Five Eyes countries and Finland respond to hybrid threats. Without engaging with the perspectives of China and Russia, it is difficult to assess the full effectiveness of Western responses. Broader, more inclusive frameworks are needed to understand hybrid warfare dynamics from all sides. The fluidity of the concept further complicates this task. As global adoption of the term increases, its meaning becomes more ambiguous. For instance, Western actions during the Ukraine war, such as freezing assets of Russian oligarchs, may qualify as hybrid tactics (UK Parliament, 2025), though interpretations vary depending on geopolitical perspective. China and Russia would not view themselves as adversaries in the same way Western actors do. With this in mind, to fully understand the modern hybrid threat landscape, it is essential to move beyond a binary framework and consider how all parties engage with and define hybrid warfare.

### *Communications, Transparency, and Accountability*

Transparency and public communication are central to understanding how Australia, Canada, Finland, the UK, the U.S., and New Zealand approach hybrid warfare. While none of these states have openly disclosed comprehensive hybrid warfare strategies, they address related components, such as cyber threats, disinformation, and foreign interference, through compartmentalized policies. Finland is a notable exception, openly discussing hybrid threats through the Ministry of the Interior and the Border Guard, reflecting a more integrated and transparent approach. This example shows the contrast in communication and transparency among the states. Indeed, this hesitancy toward transparency may stem from the covert nature of hybrid warfare; disclosing strategies could potentially aid adversaries in circumventing them. However, Richey (2018) counters this view, arguing that transparency in non-military domains, particularly information warfare and cyber operations, can strengthen societal resilience. Drawing from the EU's response to Russian hybrid threats, Richey emphasizes that strategic communication helps prepare institutions and the public to recognize and resist hybrid tactics. These perspectives suggest that while there is a need for secrecy, deliberate transparency can enhance overall preparedness and societal robustness against hybrid threats. Thus, the issue is not whether to communicate publicly, but how to do so without compromising national security. A strategic communication framework can inform and empower citizens without revealing operational vulnerabilities. Finland's example shows how direct engagement with the public can build resilience and foster a proactive security posture. Ultimately, other states would benefit from incorporating similar approaches, reinforcing the broader thesis that adaptive, transparent, and comprehensive strategies are essential for effectively countering hybrid warfare.

## Final Thought

This paper has examined how Canada, Australia, New Zealand, the UK, the U.S., and Finland have responded to the evolving threat of hybrid warfare. While all six states recognize hybrid warfare as a blend of conventional and non-traditional tactics, including cyber operations, disinformation, and foreign interference, their responses vary considerably. Canada and New Zealand exhibit fragmented, reactive approaches, while Finland has adopted a comprehensive, transparent strategy that brings together civilian and military preparedness. These contrasts demonstrate the importance of understanding how policies are coordinated and implemented across different institutional frameworks. Additionally, these findings underscore a central insight: preparedness depends not only on recognizing the threat but on how clearly and cohesively states embed hybrid warfare responses across their institutional frameworks.

Looking ahead, stronger coordination between researchers and policymakers will be essential in refining national strategies and building holistic and effective approaches. International collaboration, especially through NATO and allied frameworks, remains uneven and warrants further exploration to strengthen collective responses. In the case of Asia, and particularly with respect to China, future research should address persistent challenges around data access, strategic transparency, and conceptual differences. Understanding how hybrid threats are defined, deployed, and countered in non-Western contexts will be critical for building informed, adaptive policy responses. Future lines of inquiry should prioritize measuring the effectiveness of hybrid warfare strategies, assessing international coordination efforts, and clarifying the concept's application across different geopolitical environments. These steps are essential in supporting the development of more resilient and coherent responses to hybrid threats as they continue to evolve.

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# Feeding the Algorithm: How Nations Shape AI Training Data to Project Power and Influence Global News Narratives

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*Large language models (LLMs) and generative artificial intelligence (AI) systems are emerging as key intermediaries in the global circulation of news and political knowledge. Yet the datasets that feed these systems are neither neutral nor universal. Governments, regulatory bodies, and corporate ecosystems are now treating training data as a strategic resource—one that can encode national priorities, cultural hierarchies, and geopolitical narratives into the algorithmic infrastructures of communication. This conceptual essay develops the notion of algorithmic diplomacy, arguing that nations are actively curating, regulating, and disseminating datasets to project soft power through AI. Drawing on theories of epistemic sovereignty, digital colonialism, and media framing, the paper identifies three main mechanisms: (1) data curation and localization, (2) model fine-tuning and regulatory alignment, and (3) narrative seeding through open-source ecosystems. Comparative illustrations from the European Union, the United States, China, Russia, and the Gulf states reveal how "feeding the algorithm" has become a new instrument of influence within the global information order. The essay concludes that algorithmic infrastructures now constitute a form of epistemic territory—a contested space where values, identities, and political legitimacy are negotiated through data rather than discourse.*

***Keywords:*** *AI Geopolitics, Large language model, Data sovereignty, Algorithmic Diplomacy, Global Media, Soft power*

## Introduction

*From Information Power to Algorithmic Power*

In the past decade, the architecture of global communication has shifted from the open web of texts, images, and hyperlinks to opaque algorithmic systems that extract, categorize, and reproduce human knowledge. Where once the key struggle concerned access to media channels, today it concerns access to the training datasets that shape machine perception. This transformation redefines the very nature of media power.

As large language models such as GPT-4, Gemini, ERNIE Bot, or Falcon 180B become everyday interfaces to information, the politics of news and knowledge is increasingly mediated by statistical patterns learned from data. When these datasets are dominated by specific linguistic or ideological sources, AI models reproduce their cultural logic. Thus, the curation of data has emerged as an instrument of soft power—a mechanism through which states and corporations alike seek to shape how the world is interpreted and narrated.

This paper advances the argument that feeding the algorithm is a deliberate act of geopolitical communication. It is a form of algorithmic diplomacy: the strategic management of data inputs, model architectures, and governance frameworks to project influence and protect informational sovereignty. Understanding this process is essential for scholars of global media because algorithmic systems are no longer passive tools—they are active participants in the production of reality.

*Research Aim and Contribution*

Rather than offering an empirical evaluation of particular models, this essay provides a conceptual and comparative framework. It traces how five geopolitical blocs—the United States, the European Union, China, Russia, and the Gulf states—approach the relationship between AI and media influence. By bringing together insights from international communication, political economy of data, and critical AI studies, it contributes to three debates central to Global Media and Communication:

1. The globalization of algorithmic infrastructures and the reconfiguration of media hegemony.
2. The rise of data sovereignty as a new modality of national power.
3. The implications of AI for pluralism, journalism, and the democratic circulation of meaning.

The paper argues that the contest over training data is neither technical nor peripheral. It represents a new epistemic frontier, where the capacity to shape what AI "knows" becomes equivalent to shaping what societies believe.

### *Conceptualizing "Feeding the Algorithm"*

The metaphor of feeding underscores two dimensions: (1) the material provisioning of datasets—the text, images, code, and audiovisual material that sustain machine learning; and (2) the normative act of selection—deciding what is nutritious or toxic to the informational body politic. Just as public broadcasters once filtered national identity through editorial choices, today ministries, regulators, and data consortia filter identity through training pipelines. "Feeding the algorithm" thus captures the convergence of technical engineering and ideological narration.

## Theoretical Framework

### *Epistemic Sovereignty and Data Colonialism*

The first theoretical pillar concerns epistemic sovereignty—the right and ability of political communities to define the parameters of legitimate knowledge. Historically, control over communication channels guaranteed narrative authority; in the digital era, control over data flows serves the same function. Couldry and Mejias (2019) describe this process as data colonialism, whereby human experience is continuously appropriated, quantified, and monetized by dominant technological powers.

From this perspective, the training data of AI systems form an infrastructure of epistemic extraction. Nations lacking robust digital industries become raw-material exporters—providers of linguistic and cultural data to foreign platforms—while advanced economies consolidate interpretive control. Consequently, several states have begun to legislate data localization, compelling that national data be stored and processed domestically. Such measures are often justified on privacy grounds but also express a deeper ambition: to reclaim epistemic sovereignty by feeding one's own narratives into AI.

In this sense, the competition over AI datasets parallels historical struggles over cultural imperialism. If the 20th century was marked by debates on who speaks in global media, the 21st century revolves around what the machine learns to say.

### *Soft Power, Digital Geopolitics, and Algorithmic Diplomacy*

Joseph Nye's (2004) concept of soft power—the ability to attract and co-opt rather than coerce—remains instructive, yet requires extension to the algorithmic age. Digital networks transform persuasion into infrastructure. As Bjola and Holmes (2020) argue, diplomacy now operates through code, standards, and platforms—a process they call digital diplomacy. Building on their work, this essay introduces the term algorithmic diplomacy to denote state efforts to embed national values within AI systems and to negotiate their global diffusion.

Algorithmic diplomacy functions across three domains:

1. Regulatory Diplomacy: Crafting laws and ethical guidelines (e.g., EU AI Act, China's Generative AI Measures) that project normative authority beyond borders.
2. Infrastructural Diplomacy: Investing in sovereign LLMs and data centers as symbols of technological independence.
3. Narrative Diplomacy: Feeding national archives, cultural repositories, and media corpora into training pipelines to ensure representational parity.

In all three domains, attraction stems not from messages but from standards—from the moral and technical architectures through which the world is mediated. Hence, algorithmic diplomacy transforms communication power from symbolic persuasion to systemic design.

### *Framing Theory and Algorithmic Mediality*

Entman (1993) defines framing as the process of selecting aspects of reality and making them salient to promote particular interpretations. LLMs, by predicting the next probable word, perform framing at scale. They condense collective linguistic memory into statistically likely associations. Thus, the framing function is automated and invisible. The "salience" of certain interpretations is no longer the outcome of editorial decision-making but of data distribution.

Hall's 1980 encoding/decoding model shows how meaning is made from the way we understand cultural norms, and this is also what happens with the interaction between the AI model's output and the expectations of the user.

Herman and Chomsky’s propaganda model of 1988 says that there are structural barriers that control what information gets through to the public, something that's comparable to the biases and guidelines used in AI systems. Coming hotfooting out of the 90s, Castells’ theory of communication power stresses the role of networked infrastructures in shaping the way we understand the world, a phenomenon that's intensified by AI systems that can now reach an almost unlimited scale.

When a model trained predominantly on Western English-language news responds to a query about “freedom,” “protest,” or “terrorism,” its linguistic patterns already encode ideological priors. Consequently, AI systems act as meta-framers—they frame the frames through which publics understand events.

Well-known theories on the horizon of these debates are not, therefore, invalidated by the emergence of LLMs.

This reconceptualization bridges communication theory and AI studies. Whereas classical media framing focused on journalists and institutions, algorithmic framing shifts attention to datasets, tokenization, and model alignment. The newsroom of the future may reside in the pre-training corpus.

### *Critical Political Economy of AI*

From a political-economy standpoint, training data represent the labor of millions of writers, journalists, and users whose content is scraped without compensation. Schiller’s (1999) idea of digital capitalism finds new expression here: value is produced not only through content consumption but through data extraction that sustains proprietary models. This reinforces asymmetries between data-rich and data-poor regions.

Developing countries risk becoming informational peripheries, dependent on Western or Chinese AI providers. Their news narratives, cultural idioms, and linguistic specificities are under-represented, leading to what could be termed algorithmic dependency. Addressing this imbalance requires not only policy interventions but the creation of local datasets and open-source alternatives that reflect diverse epistemologies.

### *Technical Pathways of Algorithmic Framing*

When training large language models, algorithmic bias doesn't come by chance, it's basically a result of the way the model has been constructed. Breaking down text into tiny units that mirror the way we use words, and giving more weight to languages that already have a lot of online presence.

Well-known researchers Bender et al. In 2021 showed that this leads to under-resourced languages and cultures being poorly represented. When this imbalance is repeated over the millions of times it takes to train a model, the result is a fundamental skewing of the internal representation of the model towards the most dominant digital cultures.

Another shaping process, Alignment, takes place, and Reinforcement Learning from Human Feedback (RLHF) is now widely used in fine-tuning, and relies on people who, knowingly or not, bring their own cultural norms, prejudices, and ideas of what is 'correct' to the party, which creates a yet another layer of moral guidelines.

According to Raffel et al. In 2020, a combination of these factors, tokenization, data and alignment, gives rise to a complex, layered framework of meaning. It turns out that algorithms don't reproduce linguistic patterns in a neutral way. They in fact construct a hierarchy of what's important and what isn't, which is influenced by technical decisions, cultural preferences and politics.

## Methodological Orientation and Comparative Scope

Although this essay is primarily conceptual, it follows the logic of a comparative policy analysis. The selected cases—the United States, European Union, China, Russia, and Gulf States—represent distinct models of AI governance and media power:

1. The United States: Market-driven innovation; liberal discourse on freedom of expression; dominance of private tech giants.
2. China: State-oriented control; ideological alignment of datasets; strategic pursuit of technological self-reliance.
3. Russia: Hybrid authoritarian-informational model emphasizing sovereignty and disinformation resilience.
4. European Union: Normative regulation; pluralistic datasets; emphasis on ethics and transparency.
5. Gulf States: Tech-driven modernization and soft-power projection through Arabic-language AI initiatives.
6. Global South: knowledge collective and community-led

Each represents a different answer to a shared question: Who controls the epistemic infrastructures of AI? Their comparison allows us to discern global patterns in how nations "feed" algorithms to reinforce identity and legitimacy.

## National Approaches to Algorithmic Sovereignty

### *The United States: Market Liberalism and Infrastructural Dominance*

The United States remains the epicenter of AI innovation, hosting most leading model developers—OpenAI, Google DeepMind (originally British but absorbed into Alphabet), Anthropic, and Meta. are pushing the boundaries of what is known as the "epistemic environment". Or the rules that govern how we understand the world.

Its approach to AI reflects the broader American ideology of market-driven governance and corporate exceptionalism. The absence of a national data strategy has allowed private firms to accumulate immense training corpora, drawn largely from English-language internet sources.

This laissez-faire environment reinforces the soft power of U.S. culture in two ways. First, because global models are predominantly trained in English, they implicitly encode the cultural grammars of liberal democracy, individualism, and market rationality. Second, through platforms such as ChatGPT or Gemini, U.S. corporations export not only products but epistemological infrastructures—the ways of asking, answering, and valuing information. Third these companies have taken on a kind of de facto global standard-making role, through their exclusive control over safety protocols, proprietary datasets, and alignment rules. The US tech firms make decisions that define what is and isn't toxic, how safety filters work and which data sources are acceptable and the world starts to follow.

While the Biden administration's Executive Order on the Safe, Secure, and Trustworthy Development of AI (2023) introduced principles of fairness, security, and accountability, it largely preserved the primacy of corporate actors. This aligns with America's historical reliance on private soft power—the capacity of media and technology industries to globalize U.S. cultural norms without explicit state orchestration (Nye, 2004).

As argued by Nye (2024) this basically boils down to the privatization of soft power, US social norms and political systems are now spreading around the world through code, user interfaces and algorithmic settings, and this gives these corporations a form of infrastructural diplomacy. Rather than having to resort to traditional diplomatic statements or treaties, these companies control the way the world goes about its business, which is usually referred to as a type of "platform diplomacy".

In this context, "feeding the algorithm" occurs through data abundance rather than curation. The United States feeds the world's AI systems by default, because its digital footprint dominates the global web. The resulting models reproduce Western-centric assumptions under the guise of universal rationality.

*China: Algorithmic Nationalism and Ideological Alignment*

China's approach stands at the opposite pole. The 2023 Interim Measures for the Management of Generative Artificial Intelligence Services mandate that AI outputs "reflect socialist core values" and "avoid content subverting state power or harming national unity." These regulations transform data governance into a mechanism of ideological discipline.

Chinese tech giants—Baidu (ERNIE Bot), Alibaba (Tongyi Qianwen), iFlytek, and Tencent—train their models primarily on domestic corpora, including state media archives, academic databases, and heavily moderated social platforms such as Weibo or WeChat. This ecosystem produces what could be described as algorithmic nationalism: an AI-mediated articulation of Chinese modernity that emphasizes harmony, stability, and collective progress.

The strategy serves multiple objectives. Domestically, it maintains narrative coherence across digital spheres; internationally, it projects an alternative epistemic model to the Western paradigm of liberal openness. By promoting Mandarin-language models and data localization, China asserts its technological sovereignty while cultivating a sphere of cultural influence in the Global South—particularly in Africa and Southeast Asia, where Chinese-funded digital infrastructure is expanding.

This form of algorithmic diplomacy merges propaganda, soft power, and infrastructure-building. The Chinese state does not simply feed AI with national data; it designs the nutritional regimen—deciding which values constitute healthy digital knowledge.

*Russia: Informational Autarky and Strategic Insulation*

In the wake of Western sanctions and the digital decoupling triggered by the invasion of Ukraine (2022), Russia has intensified efforts to build an autonomous AI

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ecosystem. Models such as RuGPT and Sber AI are trained predominantly on Russian-language data drawn from domestic platforms (VK, Yandex) and state-owned news agencies (TASS, RIA Novosti).

This isolationist approach constitutes a form of informational autarky—an attempt to maintain control over public discourse by minimizing dependence on Western digital infrastructures. It reflects the Kremlin's broader narrative of sovereign internet and Russkii mir (Russian world), wherein language and information are instruments of geopolitical unity.

From a communication-theoretical perspective, Russia's strategy reveals a paradox. By restricting exposure to external sources, it safeguards narrative control but also constrains innovation, as LLM performance correlates with data diversity. Nonetheless, the political function is clear: to insulate domestic information flows from what Moscow portrays as "Western algorithmic imperialism."

The Russian case thus exemplifies how algorithmic sovereignty can serve authoritarian resilience. AI is not merely a technological tool but a symbolic frontier in the reassertion of national identity under global pressure.

### *The European Union: Ethical Regulation and Pluralistic Autonomy*

The European Union represents a distinct normative project, seeking to reconcile technological innovation with democratic values. Through the AI Act, the Digital Services Act, and the creation of European Data Spaces, the EU aspires to develop a "trustworthy" AI ecosystem grounded in transparency, accountability, and human rights.

Unlike the United States' market logic or China's ideological control, the EU's approach centers on regulatory soft power (Bradford, 2020)—the export of ethical standards as a form of global influence. By setting high compliance requirements for any model operating within its market, the EU effectively externalizes its governance philosophy worldwide. This process, sometimes called the "Brussels effect," extends European norms beyond Europe's borders.

At the data level, initiatives such as AI4Media, Horizon Europe Data Spaces, and collaborations with European public broadcasters (EBU) aim to create diverse, multilingual training corpora. These efforts embody a vision of algorithmic pluralism—a counterweight to the Anglophone bias of global AI.

However, critics note a persistent dependency on U.S. cloud infrastructures and foundation models. Europe feeds AI with values rather than volume; it excels in normative design but lags in computational capacity. Nevertheless, its emphasis on transparency and inclusion establishes a moral framework that other regions increasingly emulate.

### *The Gulf States: Narrative Modernization and AI as Soft Power*

The Gulf Cooperation Council (GCC) states, particularly the United Arab Emirates and Saudi Arabia, have embraced AI as a pillar of their post-oil development visions. The Falcon LLM (developed by the UAE's Technology Innovation Institute) and Jais (a bilingual Arabic-English model produced in collaboration with G42 and Cerebras) signify an emerging ambition: to position the Arab world as an epistemic producer, not merely a consumer.

These models are trained on vast Arabic-language datasets, incorporating religious, literary, and contemporary media sources. The objective is twofold: to preserve linguistic heritage and to project a cosmopolitan image of the Gulf as a hub of innovation and moderation.

Through international partnerships—such as Abu Dhabi's collaborations with OpenAI and global universities—the region practices a form of techno-diplomacy that blends cultural identity with strategic branding. AI becomes both a tool of governance (enhancing state efficiency) and a medium of influence (reframing the Arab world's global image).

In contrast to the coercive or defensive stances of other powers, the Gulf approach is aspirational. It feeds the algorithm not only to assert control but to enter the global conversation—to ensure that Arabic voices shape the digital future.

### *Global South Pathways*

Looking at the development of Artificial Intelligence in the Global South, we're seeing a challenge to the simplistic idea that there's a contest between Western and Chinese infrastructures. Coming from Africa, Latin America and South Asia, researchers are laying out new ways of understanding AI, that center on making sure everyone has a voice, participatory decision-making and kicking back against digital colonialism.

One great example of this is the Masakhane initiative, which showed us that a community-driven approach could add 100 languages to the global AI landscape, thanks to the hard work of Nekoto et al. In 2020. In Latin America, the data commons projects have been using decolonial methods to make knowledge collective and community-led, according to Villena et al. In ‘23.

These projects highlight that we're all about epistemic pluralism. We don't just copy-paste models from elsewhere, we’re actually shaping the AI systems that will be used in our backyards, to reflect our cultures, histories and social realities.

From a global perspective, the digital divide highlights the potential for AI to harden pre-existing global hierarchies. However, as we have seen through the recent emergence of open-source AI models and collaborative NLP movements, such as Masakhane, alongside decolonial data efforts in Latin America, Africa, and South Asia, we are witnessing clear signs of a thriving ecosystem, and that the Global South will not be left behind in the AI revolution. Well-known initiatives and models like these enable underrepresented communities to co-create, curate, and manage their own datasets, create their own guidelines to follow, and feed in ideas born out of local cultures, and because they’re completely open-source, we’re no longer forced to run with the corporate giants. The Global South, Latin America, and South Asia have the ability to steer, in any direction, the fundamental theories that shape a thriving ecosystem.

## Mechanisms of Algorithmic Influence

Across these cases, three primary mechanisms emerge through which nations “feed” AI systems to project influence.

### *Data Curation and Localization*

The first mechanism concerns the selection and territorialization of data. States curate datasets that embody national values and restrict cross-border data flows through localization mandates. This strategy simultaneously safeguards privacy, supports domestic industry, and enforces epistemic boundaries.

For example:

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- China's Data Security Law and Cybersecurity Law (2021) require that critical data be stored within national territory.
- The EU's GAIA-X and European Data Spaces initiatives aim to create interoperable but sovereign repositories.
- India's Bhashini platform, though not analyzed in depth here, reflects similar ambitions for linguistic sovereignty.

Localization transforms datasets into political borders. What enters an AI model—and what remains outside—becomes a question of national jurisdiction. In this way, data governance acts as cartography: drawing the informational boundaries of the state in the digital realm.

### *Model Alignment and Fine-Tuning*

The second mechanism involves post-training alignment, where models are fine-tuned using reinforcement learning or curated examples to ensure compliance with national norms. Alignment serves as the digital equivalent of editorial oversight.

In authoritarian contexts, such as China or Russia, alignment enforces ideological conformity: models are prevented from generating dissenting or sensitive content. In liberal democracies, alignment often emphasizes safety, fairness, and non-discrimination, reflecting ethical pluralism rather than censorship.

The process is technically subtle but politically profound. It represents a shift from content regulation (monitoring what users publish) to model regulation (monitoring what machines can imagine). As alignment datasets increasingly determine the expressive boundaries of AI, they become instruments of normative power.

### *Narrative Seeding and Open-Source Ecosystems*

A third, often overlooked mechanism is narrative seeding—the deliberate production of open-access materials designed to influence the knowledge base of AI models. It's not the same as disinformation. Which aims to manipulate human minds, but rather a planned system to distribute premeditated, news-style articles, policy briefs, and reports, which contain ideological content across the web.

Governments and related entities use mirrored domains, webpages and multilingual repositories to ensure these messages are disseminated. They bank on large web crawlers and pretraining of language models to stumble upon and process these texts, thereby training the language model.

By default many LLMs scrape from the open web, states and aligned actors can flood the digital commons with targeted content.

This may include digitized archives, state-sponsored research, or strategically framed media coverage. For instance:

- Western think tanks (RAND, Brookings, Atlantic Council) publish thousands of reports that LLMs later internalize as authoritative.
- Russian and Chinese outlets mirror their content across multiple domains to ensure web persistence.
- The U.S. and EU fund open datasets emphasizing democratic values, human rights, and transparency.

A characteristic of this narrative seeding isn't quantity, but a tangled web of redundancy. A single, well-prepped story can be reproduced over and over and posted across various sites, crushing the odds that it won't be found in the training corpus. As stated in research by Starbird et al in 2020, it's the repetition of a particular story that changes the pattern within a model to make it skewed in its understanding of the world, specifically on geopolitical disputes and historical events.

As AI systems now crave and digest larger volumes of machine-readable data. Databases, digitized archives and infographics formulated to be swallowed up by robots, this way of seeding stories is evolving. This isn't so much about shouting down a message, as it's about setting the building blocks of the foundation that AI will run off of. Coming from a background of rhetoric to being concerned with infrastructure, narrative power is changing how AI perceives global events. Narrative seeding thus represents a form of soft information warfare, operating not through disinformation but through information saturation. By shaping the corpus from which AI learns, actors influence the epistemic horizon of machine-generated knowledge.

*AI Diplomacy and Multilateral Norm-Setting*

Beyond national efforts, algorithmic influence unfolds through international organizations and standards bodies. The OECD Principles on AI (2019), the UNESCO Recommendation on the Ethics of AI (2021), and the G7 Hiroshima Process (2023) each articulate global norms for responsible AI. Yet these initiatives also function as arenas of soft power, where states negotiate the moral parameters of the algorithmic order.

The European Union's leadership in ethical AI positions it as a normative power; China's participation underscores its desire for legitimacy; the United States frames openness as innovation; and the Gulf states advocate inclusion through cultural representation. Each contributes to a global conversation where legitimacy is increasingly encoded in technical protocols rather than diplomatic communiqués.

*Security, Adversarial Manipulation & AI Resilience*

Despite their sophistication, large language models remain vulnerable to adversarial manipulation that can compromise their integrity and reliability. Adversarial prompts can bypass safety controls, while carefully designed "jailbreaks" exploit latent weaknesses in alignment (Biggio & Roli, 2018). Yet the more insidious threat arises from data poisoning: the deliberate insertion of manipulated content into online spaces where web scrapers might later ingest it (Goldblum et al., 2022). Because pretraining datasets are vast and semi-opaque, even small quantities of such material can introduce subtle shifts in model behavior.

Securing AI systems therefore requires a holistic approach that extends far beyond patching vulnerabilities. Robust provenance tracking, continuous red-teaming, and behavioral audits must be integrated into development pipelines. Moreover, states must treat AI integrity as a national security priority, recognizing that vulnerabilities in training corpora or alignment procedures can translate into vulnerabilities in democratic discourse.

## Discussion: From Propaganda to Protocols

*The Structural Shift of Influence*

Traditional propaganda sought to persuade audiences; algorithmic diplomacy seeks to preconfigure them. Influence is relocated from message to medium, from rhetoric to architecture. The decisive act is not the broadcast but the training. Whoever shapes the training corpus shapes the conditions of intelligibility itself.

This marks a transition from communicative to computational hegemony. Power operates through the infrastructure of prediction. In this sense, AI models are not merely tools of communication—they are technological publics, aggregating human expression into algorithmic norms.

In terms of algorithmic diplomacy, one of the most striking things is how feeding the algorithm is starting to blur the lines between soft and hard power, a difference that was previously relatively clear. Military forces around the world have been ramping up the use of large-scale artificial intelligence models to manage everything from intelligence fusion and targeting, satellite image analysis, cyber defense automation, to war games simulations, and they're counting on these systems to be accurate and reliable, and as we know, the accuracy of these systems is largely influenced by the quality, origin, and perspective of the data.

Countries with the ability to command the flow of data can, in effect, fine-tune their operations, and possess a strategic superiority. In the use of force, the decisions made about how and when military forces are utilized are now under influence , with a false or skewed danger assessment potentially decimating the lives of thousands, but precision-crafted national data, however, elevates early warning systems, autonomous navigation and decision aid systems. No wonder that algorithmic force is now entrenched in the organizational structures of nations. As AI systems used by the military start to rely on civilian-supplied models, nations are facing a very serious threat.

The end result of feeding AI isn't that the physical application of force is being replaced, but that it is changing the way we see, schedule, and justify the use of force within the military's decision-making process.

### *Algorithmic Enclaves*

Ideological beliefs and regional data policies are in place, they can create AI systems that look at the world very differently, when different regulatory systems. Coming hotfooting from the West, liberal democracies have a completely different idea of the way things work, than countries like China or Russia, who have more tightly controlled data sets, as shown by Kalluri back in '20. Well-known problems can be seen as less important in one place and completely devastating in another, and as DeNardis pointed out, this fragmentation mirrors the way countries are divided, often in a predictable way.

If we don't do anything, these AI systems can develop into self-sufficient, hard-to-change "enclaves" that won't allow for a common understanding and could make diplomacy extremely difficult. To prevent this from happening we need international agreements on transparency, regional cooperation, and testing the accuracy of AI, all of which will help sort out what works and what doesn't in the field of AI.

### *Ethical and Democratic Implications*

The embedding of national narratives into AI raises urgent ethical questions. Can a system trained on state-curated data ever produce pluralistic outputs? How can citizens evaluate the ideological provenance of machine-generated information? If epistemic sovereignty becomes the organizing principle of AI governance, global communication risks fragmenting into insulated algorithmic spheres.

At the same time, total openness is not a panacea: unregulated data scraping perpetuates colonial hierarchies and infringes on individual rights. The challenge, therefore, lies in balancing sovereignty with solidarity—designing AI systems that respect cultural specificity without reproducing digital nationalism.

### *Toward an Epistemic Multilateralism*

One potential solution is epistemic multilateralism: collaborative governance of AI data at regional or global scales. Initiatives such as the EU–African Union data partnerships, or UNESCO's global observatory on AI ethics, hint at a model of shared stewardship. These frameworks could promote diverse training datasets representing multiple linguistic, cultural, and ideological perspectives, ensuring that global AI systems reflect the plurality of human experience.

When looking to govern the rapidly evolving field of artificial intelligence, a global agreement seems to be the holy grail, but in the short term, the best option for AI governance is essentially to set up smaller-scale, minilateral or coalition-based frameworks, which have already started to take shape in the likes of the G7 Hiroshima Process, the

OECD Principles on AI, UNESCO's Recommendation on the Ethics of AI and the EU-US Trade and Technology Council.

These regional arrangements, though, require technologically aligned countries, and can run into roadblocks. The starkly different regulatory approaches of liberal democracies and authoritarian regimes, the intense competition between the US and China, and countries now viewing AI as a matter of national security, can all be insurmountable hurdles.

Consequently, progress in AI governance will be uneven, hailing from lots of different directions, and primarily regional.

For media scholars, this suggests a new research agenda: tracing how international communication is reconfigured through machine learning, and how cultural diplomacy adapts to an environment where the algorithm is the message.

*AI-Mediated Influence Operations*

They took the concept of digital influence to a new level, when generative AI systems became a reality. Coming hotfooting off the heels of this technology, AI systems can now create clear, clever and tailor-made messages that can deceive people into thinking they're hearing from someone they know, which makes it difficult to tell what's real and what's not.

Paired with artificial personas, networks of robots, and pinpoint targeting, AI systems can keep up the pressure of their campaigns by changing them as the news unfolds. NATO's Strategic Communications Centre of Excellence (2023) says that these kinds of operations don't aim to immediately convince people of anything, but instead, they wear down people's trust in the media, governments, and each other. Well-known problems in the digital world, influence operations can be so subtle that people may not even notice that the way they form their opinions has been quietly influenced by algorithms. What makes this threat unique is how simple it is to get started. All the tools you need are becoming cheaper, more accessible and more effective, so we're likely to see a lot more AI-facilitated propaganda in the years to come.

Looking at the rapidly changing world of global politics and international affairs, a term has been introduced: epistemic multipolarity. This basically means that countries are taking charge of their own data, and sending the future of global control into a completely new direction.

We're seeing this play out in the contrasting roles of the US and China, and in their artificial intelligence systems, we can get a glimpse of the real character of the countries they represent. But it's security, power, and governance that will be at the heart of their disagreements, something they couldn't possibly agree on coming from such vastly different perspectives, and are virtually guaranteed to be poles apart. They'll also have completely opposing views on the state of the world and how to sort out the problems they both face, and because of this, they'll likely be at odds on more critical subjects such as climate change, refugee crises, and pandemics. Well-known questions will also be raised about what's the difference between hard and soft power.

The way we program our AIs is sending us down a very important path. Shaping how we're directed, and under what circumstances we go to war. We're not just painting a picture of how people perceive the world; we're fundamentally redefining the principles of international cooperation and forcing scholars to start looking at the root of the information economy.

## Conclusion: The Algorithm as Arena of Global Communication

Artificial intelligence has emerged as both a medium and a message of globalization. Its infrastructures—servers, datasets, and models—constitute the invisible backbone of contemporary knowledge production. Yet these infrastructures are not neutral. They are socially produced, politically regulated, and strategically contested. As this essay has argued, nations are increasingly aware that what machines learn determines what societies know.

The notion of feeding the algorithm captures the deliberate and strategic ways in which states, corporations, and transnational actors attempt to shape the epistemic diets of LLMs. From the laissez-faire abundance of the United States to the normative regulation of the European Union, from China's ideological alignment to Russia's autarkic insulation and the Gulf's narrative modernization, the global AI landscape resembles an emerging epistemic multipolarity.

In this environment, algorithmic diplomacy becomes the new frontier of global media and communication. It operates through standards, data governance, and infrastructural alliances rather than overt persuasion. Influence is encoded not in messages but in models; power is exercised through training corpora and alignment procedures that define what counts as credible, relevant, or acceptable.

This shift from propaganda to protocols transforms the study of communication itself. To analyze the global circulation of meaning, scholars must now interrogate the hidden layers of AI—its datasets, annotation practices, and regulatory frameworks. The newsroom of the future may be written in code, but the contest over truth remains profoundly human.

It's becoming very clear that we need more cooperative governance, when AI systems are mediating the bulk of political communication and rational thought in our society. One approach to this challenge, Epistemic Multilateralism, suggests a way to reconcile the need for sovereignty and interoperability.

Instead of forcing a uniform epistemological framework or retreating into isolated, separate systems, Epistemic Multilateralism calls for shared structures, such as joint datasets, clear annotation guidelines, and cross-regional review bodies, which ensure that different information systems can be understood and respected.

A concept that was explored by Couldry & Mejias back in 2019 and Milan & Treré in 2020. This isn't just about technicalities, it is, fundamentally, a political process that has the ability to maintain and support our fragile, yet interconnected global communication landscape.

The future of global communication will depend on our ability to design AI systems that balance sovereignty with openness, diversity with accountability, and automation with democratic deliberation. Without such balance, the world risks fragmenting into algorithmic enclaves—each trained to recognize only its own truths.

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# New Colonialism in An Ecological Guise: Waste Trade from Developed Countries to Developing Countries as A Form of Environmental Racism

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*Waste trade from developed to developing countries reflects systemic environmental racism. Wealthy nations turn poorer nations into dumping grounds, creating structural injustice and geography-based discrimination. The concept of ecological colonialism reinforces this, highlighting environmental exploitation in colonized countries. Environmental issues and so-called "green" policies are often used by developed nations to impose dominance over the Global South. This is manifested in the exploitation of natural resources, dependency on debt and foreign loans, technological domination, and waste colonialism. Such practices demonstrate that environmental protection is prioritized only for the powerful, while marginalized communities are sacrificed, thereby reinforcing structural inequality and dependency. This study frames waste trade not as ordinary commerce but as a form of domination over developing countries, particularly in Asia and Africa. Using qualitative methods and secondary data collection, it presents a theoretical framework to explain how waste trade becomes a tool for developed nations to create structural dependency.*

***Keywords:*** *Toxic Colonialism, Global South, Global North, Waste Trade, Environmentalism*

## Introduction

Today, the strength and prosperity of nations cannot be separated from their achievements and activities in international trade (Adolf, 2016). Trading is a fundamental freedom that should not be hindered merely because countries embrace different economic systems, ideologies, or political structures (Adolf, 2015). Trade activities are now an essential aspect of global interaction, not only for fulfilling the demand for goods and services but also for purposes such as market expansion, increased production, and enhancing a country's exchange value through exports.

International trade relations among states have existed for a long time, alongside the emergence of the nation-state as the foundation of modern statehood. The pursuit of independence and control over the global economy has driven countries to establish stable and organized trade relations with others. Awareness of the importance of trade as a key instrument for stimulating economic growth and development has become the fundamental reason behind the establishment of such economic relations (Muhamad Iqbal & Andayani, 2024).

In general, international trade examines the foundations of trade as well as the benefits gained by countries, particularly through export and import activities. Within neoclassical theory, international trade is viewed as providing significant advantages for building a nation's economy. Nevertheless, such activities also raise concerns, as international trade is often associated with environmental degradation, especially in developing countries (Supriyanti, 2022).

The link between international trade and the environment was formally recognized at the World Summit on Sustainable Development (WSSD) in 2002. The summit produced two key agreements: first, to strengthen the mutually reinforcing relationship between trade, the environment, and development in pursuit of sustainable development; and second, to promote synergies between the multilateral trading system and the objectives of sustainable development (Widyastuti, 2023). Differences in interests between developed and developing countries are evident in the regulation of environmental issues within international trade. From an economic standpoint, there is no shared perception within the international community regarding the importance of environmental protection. Trade, which was once limited to small-scale transactions between sellers and buyers, has expanded into cross-border activities (Widyastuti, 2023).

In the modern era, trade is no longer confined to primary commodities such as food or energy but has extended to include waste as a legitimate commodity in international trade. Developed countries integrate waste exports to developing nations as a dual strategy: reducing domestic management costs while simultaneously generating state revenue. This demonstrates how waste, which should be a domestic responsibility, has been transformed into a global economic instrument, where waste flows from countries with strict regulations and high processing costs toward markets offering looser regulations and lower expenses (Rossi & Morone, 2023).

The international waste trade has become a pressing environmental issue in the modern era. Developed countries, which generate vast amounts of waste due to rapid cycles of consumerism, often choose to export this waste to developing countries where regulations are more lenient and processing costs are lower. This practice reflects the phenomenon of "toxic colonialism" or waste colonialism, in which developed nations shift the burden of pollution onto countries less capable of managing it safely (Wahyudi et al., 2020).

As a result, importing countries—often in Asia and Africa—face severe environmental degradation, ranging from contaminated soil and water to serious public health impacts in areas where informal processing takes place. Although international agreements such as the Basel and Bamako Conventions aim to restrict the transboundary movement of hazardous waste, regulatory loopholes and weak enforcement allow such practices to persist. Against this backdrop of inequality, global cooperation and investment in environmentally sound waste management technologies are urgently needed, ensuring that electronic waste becomes a shared challenge addressed in a fair and sustainable manner (Priyono, 2018).

The phenomenon of waste trade from developed to developing countries not only reflects global economic inequality but also reveals a systemic form of environmental racism. In this context, low-income nations with vulnerable populations are often turned into "global dumping grounds" by wealthy countries unwilling to bear the ecological burden of their own consumption and production. Communities in Africa, South Asia, and Latin America continue to suffer the consequences of exposure to hazardous waste, while waste-producing nations evade responsibility. This structural injustice must therefore be understood as a form of discrimination based on geography and race. As Pellow, cited in (Okereke, 2010) argues, environmental racism reflects the way the global system prioritizes environmental protection and public health only for groups with political and economic power, while sacrificing marginalized communities. This reality demands an environmental justice approach that goes beyond ecological concerns to also encompass human rights and the principles of global equality.

The research method used in this paper is qualitative. Qualitative research methods are used to understand and explain social reality from the perspective of actors, the meaning of a context, and a description of the process of formation of social reality. Qualitative methods focus on an in-depth understanding of a phenomenon through descriptive data such as journals, the internet, books, and other relevant sources. Qualitative refers to the postpositivist paradigm, which means that social sciences differ from natural sciences, and therefore, their treatment must be differentiated (Afrizal, 2019).

To conduct analysis, the researcher, as the research instrument, seeks and processes data from field observations, documents, interviews, documentation, etc. However, in this study, the researcher focused on secondary data, particularly document analysis, so data was obtained from various documentary sources. Data was categorized, synthesized, broken down into units, organized into patterns, and sorted out the important points to make the data easier to understand. Data was not converted into numbers, as it is conceptual in nature and addresses a problem (Elvera & Astarina, 2021). According to Bowen, document analysis is a procedure for reviewing and evaluating documents in various forms, both electronic and manual, and can be in the form of agendas, meeting notes, articles, books, brochures, journals, letters, maps, diagrams, press releases, organizational reports, etc (Bowen, 2009).

## Analytical Framework

### *The Concept of Ecological Colonialism in the Dynamics of Global Waste Trade*

Ecological colonialism is a theoretical discourse that highlights how colonial practices did not only exploit local people and cultures but also colonized, controlled, and damaged the environment in colonized countries. In his book Ecological Imperialism, Alfred W. Crosby asserts that European domination over new territories was not only grounded in political and military power but also advanced through the transfer of foreign organisms—including diseases, plants, and animals—that devastated local ecosystems while benefiting immigrant settlers (Rice & Stapleton, 1989).

Scholarly works such as Climate Change as Ecological Colonialism emphasize that modern climate injustice is an extension of colonial relations. Developing countries become victims of industrial activity and excessive consumption by powerful nations, expanding what is termed the global "ecological debt." This principle aligns with the theory of Ecologically Unequal Exchange, which describes the asymmetrical flow of resources from the South to the North, while the ecological consequences are disproportionately borne by developing countries (Pérez-Sánchez et al., 2021)

Ecological imperialism thus represents a form of domination and colonization exercised by colonial powers, particularly from the West, through the alteration and imposition of ecological systems, control of the environment, and patterns of natural resource management in colonized territories. This transformation of the environment has persisted from the colonial era into the present, manifesting in globalization and modern conservation. The process occurred alongside physical colonialism—such as land occupation—but also involved the importation of foreign animal and plant species, the destruction of local ecosystems, and the displacement or replacement of Indigenous ecological knowledge with Western scientific or industrial approaches. These practices have led to ecological degradation, the marginalization of local cultures, and socio-ecological inequality between wealthy and poor nations (Gibbs et al., 2021).

Furthermore, (Cheng, 2007) describes the practice of shipping electronic waste (e-waste) from developed countries to China as a form of ecological colonialism, whereby "First World capital" exports toxic waste for economic gain while shielding its industries from strict regulations. The term "toxic colonialism" was introduced by Greenpeace in 1992 to describe the export of hazardous waste from developed to developing countries, focusing on the inequality of waste production in which developing nations are rendered "global dumping grounds" (Cheng, 2007).

Neocolonialism has since emerged in the form of what is referred to as ecological or green imperialism. This form of domination occurs when developed countries deploy environmental issues and "green" policies as instruments to maintain control over developing nations. Its practices are evident in unequal trade relations, dependency on debt and foreign aid, cultural imperialism, natural resource exploitation, involvement in conflicts or proxy wars, digital colonialism, and most prominently, waste colonialism. Through these mechanisms, powerful nations continue to assert dominance over less influential countries, perpetuating cycles of structural dependency and global injustice—even within discourses that ostensibly promote environmental concern (Serwatka, 2024)

### *Legal Instruments Governing the Global Waste Trade*

The transboundary trade of waste has become an increasingly complex global issue alongside the rising volume of waste generated by modern industrial activities and consumer behavior. In addressing the environmental, health, and social impacts of waste trade, the international community has developed a range of legal instruments to regulate and control such practices. International legal frameworks are designed to create fair and sustainable mechanisms while preventing exploitation and the transfer of pollution burdens from developed to developing countries.

The 1989 Basel Convention serves as the primary instrument governing the trade and management of hazardous waste, requiring the prior informed consent of importing countries before waste can be shipped. In addition, various regional agreements and national policies further reinforce the existing legal framework. However, despite the existence of relatively comprehensive regulations, implementation and enforcement remain challenging, particularly in closing legal loopholes and addressing illegal practices that disproportionately harm countries with limited waste management capacity.

The Basel Convention (1989) regulates the international trade of waste. The types of waste traded in this context include recyclable waste (such as plastic food packaging, paper, plastic beverage bottles, cardboard, and so forth), and not hazardous waste. According to Article 4 of the Basel Convention, waste may only be traded if the exporting country is no longer able to manage it domestically, and the recycling industry in the importing country must be capable of processing such waste further. Furthermore, Article 6 stipulates that waste trade can only occur if the exporting country has provided prior notification to the importing country. Provisions regarding waste trade are also included in Article 9, which declares that any waste trade activity conducted without the consent of either party is prohibited (Yahya & Simatupang, 2024).

The primary objective of this convention is that hazardous waste should be recycled or disposed of as close as possible to the location where it is generated. Furthermore, the Basel Amendment prohibits the transfer of hazardous waste from developed to developing countries. Even in limited situations where the transboundary movement of hazardous waste is permitted (between developed countries), it must comply with the provisions of the agreement, including the requirement of prior informed consent from the receiving country. The facts outlined above, together with perspectives in international law as reflected in the Basel Convention, demonstrate the need for rational trade restrictions in international commerce, particularly when such trade clearly creates loopholes for the transfer of waste to developing countries in violation of the Basel Convention. Although the Basel framework prohibits transboundary transfers to developing countries, the absence of an effective enforcement mechanism remains a major weakness that perpetuates the problem of waste shipments to developing countries (Christian, 2017).

Countries around the world are increasingly recognizing the challenges associated with electronic waste (e-waste) and have begun introducing domestic policies, laws, or regulations to govern its management. In 2014, only 44% of the global population was covered by legal frameworks related to waste; this figure rose to 66% in 2017, and by October 2019 had reached 71%, encompassing 78 countries. In Africa, the convention regulating electronic waste is the Bamako Convention. To support the objectives of the Basel Convention (Article 11), this convention encourages parties to establish regional, multilateral, and/or bilateral agreements concerning hazardous waste, which subsequently led to the adoption of the Bamako Convention in 1998. This is an intergovernmental agreement among African states that prohibits the import of all forms of hazardous waste, aiming to reduce and manage the transportation of e-waste both domestically and across borders within Africa. Theoretically, it seeks to ensure that the disposal of electronic devices is carried out in accordance with principles of clean and environmentally sound management (Maes & Preston-Whyte, 2022).

The Bamako Convention comprehensively regulates the transboundary movement of hazardous waste through several key articles that establish an international legal framework for African states. Article 2 sets out the definition of hazardous waste and the scope of substances covered under the convention, while Article 3 requires each party to submit its national definition of hazardous waste to the Secretariat within six months of ratification. Furthermore, Article 4 imposes a strict prohibition on the import of hazardous waste from non-member states, classifying such activities as illegal and criminal. This article also regulates the prohibition of waste dumping at sea and obliges states to manage waste in an environmentally sound manner within their respective jurisdictions.

To ensure the implementation of the convention, Article 5 requires each party state to designate competent authorities, including a national focal point and domestic supervisors. Notification and consent procedures are set out in Article 6, under which any planned waste shipment must obtain the written approval of both the receiving and the transit states through a prior informed consent scheme, accompanied by a waste management contract that meets environmental standards. Article 7 stipulates that if waste passes through a non-party state, the same procedural requirements must still be followed. Should a shipment fail or be improperly managed, Article 8 obliges the exporting state to take back the waste within a maximum of 90 days. Finally, Article 9 provides a detailed definition of illegal traffic in waste, such as shipments made without notification, the use of falsified documents, or disposal contrary to the law. Parties are required to impose sufficiently severe criminal penalties to create a deterrent effect, and they remain responsible for re-importing the waste within 30 days if a violation occurs. With this legal framework, the Bamako Convention serves as a vital instrument in protecting African states from the negative impacts of the international trade in hazardous waste (United Nations Environment Programme, 2024).

## Discussion

### *Waste Trade and the Practice of Global Environmental Racism*

From an economic perspective, the waste trade can offer benefits to both types of countries. Developed nations gain from the lower disposal costs in developing countries while also avoiding growing domestic opposition to hazardous waste disposal facilities. At the same time, developing countries gain access to inexpensive raw materials through waste recycling, which can stimulate increased production and employment. At first glance, this appears to be a mutually beneficial arrangement (a win-win solution). However, many of the importing countries are heavily indebted and have a poor track record in waste management and environmental performance. Moreover, as revealed in several major cases, this situation is further exacerbated by the illegal trade in hazardous waste and its indiscriminate dumping in developing countries (Martínez et al., 2022).

Globalization has made the world increasingly complex under the banner of a borderless world. States are bound together by diverse interests, with knowledge transfer and technology exchange becoming ever more accessible. Alongside these developments, issues such as democracy and human rights (HR), gender, labor, free markets, and the natural environment have emerged. The first four issues—democracy and human rights, gender, labor, and free markets—significantly influence the last, namely the environment. These issues have heightened human awareness of their rights. Yet, particularly in the case of free markets, they have also driven humanity to exploit nature more aggressively. The free market compels states to compete in accelerating economic growth (Budiyanti, 2017). Globally, developed countries export hazardous waste to developing countries with weak regulations, reflecting a form of global environmental racism. Developed countries frequently export hazardous waste—such as e-waste, plastics, and industrial residues—to developing nations with lax environmental standards and lower disposal costs.

This practice is known as toxic colonialism and represents a concrete form of global environmental racism, as vulnerable communities in the Global South become dumping grounds for hazardous waste. Studies in the Gulf of Guinea (Côte d'Ivoire, Nigeria, Ghana) have found that toxic waste is processed informally through unsafe methods, endangering both local health and the environment, and is explicitly categorized as environmental racism (Okafor-Yarwood & Adewumi, 2020). In areas such as Agbogbloshie (Ghana), informal electronic recycling involves burning wires and plastics without protection, leading to soil, air, and water contamination with toxic substances such as lead, mercury, and dioxins—placing workers and children at extreme health risks. This constitutes a direct consequence of environmental racism, as local communities bear the burden of pollution from global waste (Jorgenson, 2009).

**Table – Waste Trade from Global North to Global South**

| No | Type of Waste | Estimated Annual Volume | Country of Origin (Global North) | Destination Country (Global South) | Key Notes |
|---|---|---|---|---|---|
| 1 | Plastic | ~3–3.5 million tons (2022–2023) | United States, United Kingdom, Japan, Germany, Netherlands, Australia | Malaysia, Indonesia, Vietnam, the Philippines, Turkey, India | After the 2017 "China Ban," large volumes were redirected to Southeast Asia. Many containers were found to be non-recyclable. |
| 2 | Paper & Cardboard | ~2.44 million tons (ASEAN from EU); 4.9 million tons (EU, 2022) | European Union, United Kingdom | Indonesia, Malaysia, Vietnam, India | 76% of EU waste exports to ASEAN consist of paper. Accepted to support local pulp and paper industries. |
| 3 | Ferrous Metals (Iron/ Steel) | ~19.5 million tons (EU, 2022) | European Union | Turkey (10.7 million tons), India, Southeast Asia | Turkey receives over 60% of the EU's iron exports; used for recycled steel industries. |
| 4 | Non-Ferrous Metals | ~2.1 million tons (aluminum/copper, EU) | European Union, Japan | ASEAN, India | Includes HS 7404 (copper) & HS 7602 (aluminum); high in value but often contaminated during informal processing. |
| 5 | Textiles / Used Clothing | ~1.5 million tons (EU), 60,000 tons/year to Chile | United Kingdom, United States, China, European Union | Africa (Kenya, Ghana), the Philippines, Chile | Large quantities are illegally dumped; harm local industries and the environment (e.g., Atacama Desert, Chile). |
| 6 | Electronic Waste (E-Waste) | ~3.3–5 million tons transboundary (2022) | United States, United Kingdom, Germany, Netherlands, European Union | Ghana, Nigeria, Pakistan, India, Thailand | Often disguised as second-hand goods; causes severe health and environmental crises in recipient countries. |

| | | | | | |
|---|---|---|---|---|---|
| 7 | Clinical / Medical Waste | 4.3 million tons → developing; 25,500 tons → least developed (2021) | G7 & OECD countries | Africa, South and Southeast Asia | High-risk waste: contains infectious, chemical, and radioactive materials. |
| 8 | Househol d Waste | 52,000 tons → developing countries; 15,300 tons → LDCs | United States, European Union | Africa, Southeast Asia, Latin America | Often mixed with hazardous waste; difficult to manage safely. |
| 9 | Used Lead-Acid Batteries | ~20 million units/year from the U.S. to Mexico | United States | Mexico | Exported for informal lead recycling; poses serious health and environmental risks. |

Source: Processed research data, 2025

Transboundary waste trade, as illustrated in the table above, reflects the complex dynamics between the economic interests of developed countries and the structural limitations of developing countries. A striking example is plastic waste, which—since China's 2017 import ban (known as the China Ban)—has diverted millions of tons of plastic waste to Southeast Asia, including Indonesia, Malaysia, and the Philippines. Much of this waste cannot be recycled and instead places enormous pressure on local waste management capacities, generating pollution and ecological degradation. This situation highlights the pattern of environmental cost externalization by the Global North onto the Global South.

Unlike plastic waste, the export of paper and cardboard from the European Union and the United Kingdom to ASEAN countries such as Indonesia and Vietnam is generally welcomed to support local pulp and paper industries. This demonstrates that not all waste trade is harmful; some carries economic value and is relatively safe when conducted under strict quality regulations and oversight. Nevertheless, risks remain when paper waste is contaminated with other materials that may disrupt the recycling process. Metal waste—both ferrous (such as iron) and non-ferrous (such as aluminum and copper)—is a highly sought-after commodity for industries in developing countries. The European Union, for example, exports nearly 20 million tons of ferrous metals, more than 60 percent of which are destined for Turkey. These materials are processed into recycled steel for the construction and manufacturing industries. Despite their high economic value, the informal handling of metal waste, as occurs in some Asian countries, poses significant risks of environmental contamination and endangers workers' health.

Used clothing or textile waste represents another form of waste that raises both social and ecological concerns. The United Kingdom, the United States, and the European Union export more than one million tons of second-hand clothing each year to Africa and Latin America. Much of this clothing is unwearable, ending up either illegally dumped or piling up in open natural environments, as seen in Chile's Atacama Desert. The consequences include disruption to local textile industries and pollution caused by non-biodegradable waste. Electronic waste (e-waste) is among the most hazardous types of waste exported from the Global North to countries such as Ghana, Nigeria, India, and Pakistan. In many cases, this waste is disguised as second-hand goods or technology donations. Electronic waste contains toxic substances such as lead, mercury, and cadmium. Recipient countries lacking appropriate recycling facilities face serious risks to public health and environmental safety, especially when metal recovery is carried out through informal processes.

Equally concerning is the trade in clinical or medical waste. G7 and OECD countries export millions of tons of medical waste to developing and least-developed countries. Such waste often contains infectious materials, toxic chemicals, and even radioactive substances. Recipient states frequently lack the infrastructure and facilities to manage this waste safely, thereby creating severe public health risks and exposing profound ethical inequalities in the global distribution of environmental hazards. Household waste shipments to developing countries, though seemingly smaller in volume, are often mixed with hazardous materials. Without effective sorting systems and infrastructure, this type of waste is difficult to manage. Irregularities in documentation and shipping further increase the potential for misuse, particularly when waste is disguised as "donations" or humanitarian aid.

Used batteries—particularly lead–acid batteries exported from the United States to Mexico—illustrate the harmful practice of transboundary pollution transfer. In Mexico, these batteries are often processed informally without adequate environmental safeguards or occupational safety measures. As a result, local communities suffer from chronic lead exposure, which increases the risk of neurological disorders and hampers children's development. The theoretical framework of ecologically unequal exchange explains how wealthy nations displace environmental burdens onto poorer nations: recipient countries supply raw materials and serve as ecological sinks (waste dumping grounds), while exporting countries reap the economic gains and ecological advantages. This dynamic constitutes a form of environmental racism on a global scale, as developing countries bear the disproportionate burden of waste and ecological degradation (Jorgenson, 2009).

Certain types of waste offer socio-economic benefits to specific communities. Nevertheless, utilizing waste as a raw material can result in significant health and environmental risks. (Hashmi et al., 2024) found that soils in several provinces of Pakistan are contaminated with electronic waste. (Dodd et al., 2023) reported that Ghana faces contamination from both non-carcinogenic and carcinogenic substances at concentrations exceeding safe soil quality thresholds. Furthermore, the study indicated that Accra, Ghana, a major e-waste dumping site, experiences metal contamination in humans. In Indonesia, imported paper and plastic waste is recycled into value-added products; however, this waste is frequently contaminated with hazardous and toxic materials (B3).

According to the Central Statistics Agency (BPS), plastic waste imports increased to 99,754 tons in 2019, representing a 4 percent rise since 2016. The primary sources of these imports were the United States, Australia, Japan, and Singapore. In the same period, paper waste imports reached 3.18 million tons, a 57 percent increase from 2016, with approximately 67 percent entering through Tanjung Priok and 28 percent processed by paper mills in East Java. The phenomenon of plastic and paper waste imports into Indonesia is not only an economic and legal issue but also has serious consequences for public health and local ecosystems. A study conducted by Ecoton and GAIA (2021) in (Hartono et al., 2021), in Sidoarjo and Gresik areas of East Java, showed that the burning of imported plastic waste at informal recycling facilities produces dioxin emissions and microplastic particles that pollute the air and groundwater.

At the community level, residents living near waste processing sites reported increased cases of upper respiratory tract infections (URTIs), skin irritation, and digestive disorders due to direct exposure to combustion smoke and liquid waste from recycling activities. Washing used plastic with river water also contributes to declining water quality, the death of river biota, and increased microplastic content in drinking water. Ecologically, the import of unsorted waste also accelerates soil and water degradation, particularly in small industrial areas lacking adequate waste treatment facilities. Non-recyclable plastic waste is dumped in open areas, resulting in toxic residues that persist in the environment. The long-term impacts include reduced agricultural productivity, threats to biodiversity, and the accumulation of hazardous chemicals in the human food chain. Thus, the Indonesian case illustrates that the transboundary movement of waste is not merely an administrative issue but has direct implications for public health and environmental sustainability (Hartono et al., 2021).

In response to this global environmental racism, the theory of ecological debt has evolved alongside ecologically unequal exchange to demand ecological accountability and reparations for Global South countries. This concept calls for recognition of historical ecological debts—long unacknowledged within frameworks of global justice—and advocates for a redistribution of ecological costs and benefits (Warlenius, 2016). Moreover, environmental racism, as Curtin emphasizes, highlights the interconnectedness of racial and environmental oppression, with one reinforcing and sustaining the other. Discriminatory environmental practices targeting socially or economically marginalized communities represent a concrete manifestation of environmental racism. This includes the export of waste from developed to developing countries and the exploitation of natural resources (Prabawati & Sudibyo, 2023).

From the overall pattern of waste trade, it is evident that developed countries tend to shift their pollution burden onto Global South countries, which have weaker regulatory systems and waste management infrastructure. This practice not only generates global environmental inequality but also perpetuates a new form of environmental colonialism. Therefore, stronger enforcement of international law is required through instruments such as the Basel Convention, alongside the enhancement of technical capacities in developing countries and the implementation of Extended Producer Responsibility. Without firm and collaborative policy interventions, cross-border waste trade will continue to place vulnerable groups as the victims of a global environmental crisis driven by excessive consumption in developed countries.

### *Structural Injustice in Environmental Racism*

The practice of transboundary waste trade reflects unequal global structures and underscores the phenomenon known as global environmental racism. At the global level, environmental racism is not merely about discrimination based on race or ethnicity, but rather a form of structural injustice in which the burden of pollution and ecological risks is shifted from wealthy countries (the Global North) to poorer or developing countries (the Global South), which have historically been marginalized within the global politico-economic system. One prominent illustration is the sharp increase in plastic waste flows to Southeast Asia following the 2017 "China Ban."

In China, the 2017 National Sword policy drastically reduced China's waste import margins, leading to a significant decline in the volume of plastic and waste paper imports. The developed countries (the US, EU, Japan) shifted their waste exports to Southeast Asian countries (Malaysia, Vietnam, and Indonesia). This shift marked China's transformation from a major importer to a player tightening waste quality standards and, later, to an exporter of high-value recyclable materials. The authors emphasize that these policy changes not only impacted global trade flows but also altered economic incentives and waste production patterns internationally, posing new challenges for recipient countries in the Global South that were unprepared for the surge in waste imports following China's ban (Li & Mu, 2024).

When China refused to serve as the world's primary dumping ground, countries such as Indonesia, Malaysia, and the Philippines became new targets. Large volumes of non-recyclable plastic overwhelmed local infrastructure and triggered pollution. In this context, such practices exemplify environmental racism, as Global South countries are positioned as "sacrifice zones" — places designated to absorb waste deemed unfit to be handled by developed countries themselves. Although certain types of waste trade, such as exports of paper and metals, are often considered economically beneficial, they nonetheless carry risks of inequality. When waste is mixed with contaminants or managed informally, as in the case of non-ferrous metals and used batteries, the dangers increase drastically. Informal processing without adequate health and safety standards exposes local communities — the majority of whom come from low-income groups — to hazardous toxins. This constitutes a concrete form of environmental risk externalization along geographic and economic lines, with profound moral and ethical implications.

Textile and electronic waste also stand as powerful symbols of global ecological inequality. The shipment of second-hand clothing to Africa and Latin America—much of which is unwearable—not only causes visual and biological pollution but also undermines local industries and deepens dependence on consumption from developed countries. A similar dynamic occurs with electronic waste, often disguised as technology donations. Behind the narrative of "digital empowerment" lies the reality that Global South countries become victims of exposure to toxic substances such as mercury and lead—without adequate processing infrastructure. This reveals how the rhetoric of aid and global trade can obscure structural injustice that is, in essence, exploitation.

Medical waste, household waste, and used batteries illustrate the most extreme dimensions of global environmental racism. Wealthy countries, equipped with advanced healthcare systems and high recycling capacities, instead divert their hazardous waste to nations with the least capacity—including those classified as Least Developed Countries (LDCs). This is not merely a technical imbalance but rather a separation of human value based on geography and economic power: the lives and health of people in the Global South are treated as if they were worth less, deemed able to bear risks that would never be tolerated in Global North societies.

This overall pattern demonstrates that waste trade is not merely a matter of economics or logistics, but rather an extension of ecological colonialism and systemic racism at the global level. The Global South is rendered a dumping ground for risk, while the Global North reaps the benefits of the consumption and production systems it dominates. Addressing this crisis requires more than technical or market-based approaches. What is needed is a paradigmatic shift that foregrounds global environmental justice, the strengthening of international agreements such as the Basel Convention, and profound reform of consumption patterns and producer responsibility through legally binding Extended Producer Responsibility (EPR) schemes. Without such structural transformation, waste trade will continue to reproduce new forms of discrimination and global injustice rooted in colonial legacies and international economic inequality.

### *Developing Countries' Resistance Through Environmental Legal Regimes*

While cross-border waste trade is frequently condemned as evidence of environmental inequality between the Global North and South, internal dynamics within recipient countries are also crucial in sustaining this activity. Ineffective governance, corruption, and dependence on the informal recycling sector enable foreign waste to enter, even in the face of import bans. For instance, in Indonesia, inadequate waste management infrastructure and the economic incentives associated with informal recycling have allowed plastic waste imports to persist, despite the implementation of several national policies (Zahrah et al., 2024).

The global e-waste trade is shaped by a complex interaction between domestic conditions in recipient countries and external pressures from exporters. In many developing nations, weak environmental oversight, corruption, and reliance on informal sectors allow waste to enter disguised as secondhand goods. For some urban poor, collecting and recycling e-waste provides essential income, despite significant health and safety risks. This creates an unregulated shadow economy that perpetuates illegal waste imports. Additionally, local demand for inexpensive raw materials encourages waste acceptance, while limited institutional capacity renders international agreements like the Basel Convention ineffective at the national level.

At the same time, developed countries are motivated to export e-waste by economic, regulatory, and political factors. High domestic waste management costs and strict environmental regulations prompt these nations to channel waste through developing countries with laxer standards. They often exploit legal loopholes by labeling waste as "refurbished" or "reusable," making these exports appear legitimate. This practice highlights a new form of global inequality, concentrating economic and technological benefits in the Global North while shifting environmental and health risks to the Global South. Consequently, the e-waste trade is best understood not as simple exploitation, but as the outcome of structural interactions between global and local interests in an unequal international system (Murthy & Ramakrishna, 2022). These findings underscore the importance of including domestic political-economic factors—such as local business interests and weak bureaucratic practices—when analyzing the global waste trade. This approach offers a fuller understanding of the reciprocal relationship between waste exports from developed countries and their reception in developing nations (Idris et al., 2024).

The cross-border waste trade, laden with structural inequalities, demands a legal response that is firmer, more progressive, and grounded in justice. The Basel Convention serves as the primary instrument for regulating the transboundary movement of hazardous waste, built upon the principle of prior informed consent (PIC), which requires the approval of the receiving country before waste can be shipped. However, the limitations of the Basel Convention—including the fact that major powers such as the United States have yet to ratify it, along with weak enforcement and sanctioning mechanisms—leave ample room for the exploitation of the Global South through legal loopholes and false waste classifications. In the context of global environmental racism and ecological colonialism, such weaknesses reinforce exploitative relations that perpetuate inequality.

For this reason, juridical strengthening is necessary through additional protocols such as the 2019 Basel Amendment (which restricts plastic waste exports), as well as the adoption of binding principles of international legal responsibility for actors involved in illegal dumping. At the same time, the Bamako Convention—initiated by African nations as a form of resistance to Basel's shortcomings—illustrates the importance of legal instruments that actively represent the interests of the Global South. Achieving global ecological justice thus requires harmonization among multilateral agreements, regional provisions, and national laws, while simultaneously advancing binding (not voluntary) obligations for Global North states under Extended Producer Responsibility (EPR). Within the framework of international law, this struggle is not only about protecting the environment, but also about upholding the principles of non-discrimination, sovereign equality, and the right to a clean and healthy environment as an integral part of human rights.

In the context of transboundary waste trade, the state holds a central role as a subject of international law with responsibility for regulating, monitoring, and enforcing rules on the movement of both hazardous and non-hazardous waste. As the primary actors in ratifying and implementing international legal provisions, states bear legal responsibility for waste export and import activities. On the positive side, several countries have demonstrated their commitment to environmental protection by adopting national policies aligned with the Basel and Bamako Conventions. Countries such as Nigeria, Indonesia, and Malaysia, for instance, have developed domestic regulations to prohibit or restrict waste imports—particularly high-risk electronic and plastic waste. In this regard, states apply the precautionary principle and the requirement of prior informed consent as stipulated in Article 6 of the Basel Convention. Furthermore, African Union member states established the Bamako Convention as a regional expression of solidarity, rejecting all forms of hazardous waste imports from outside Africa, as enshrined in Article 4 of the convention.

Nevertheless, the role of states is not free from negative dimensions, revealing structural and political weaknesses. The European Union (EU) demonstrates significant gap among these countries in terms of innovation and effectiveness of waste management. Countries like Germany, Sweden, and the Netherlands are considered “high performers” due to their high adoption of advanced recycling technologies, strong policy support, and broad public participation. In contrast, Eastern European countries like Bulgaria and Romania continue to face challenges such as limited infrastructure, limited public awareness, and weak financial support for environmental innovation. Consequently, countries with high capacity tend to export low-value waste (which is uneconomical for domestic processing), while countries with low capacity often serve as transit points or recipients of waste from neighboring EU countries. This creates an internal pattern within the European Union where waste trade also occurs intra-regionally, not just between the Global North and South. This analysis emphasizes that variations reflect structural gaps in institutional and technological capacity between EU member states, necessitating greater adaptation of common EU-level policies to individual national circumstances (Laureti et al., 2024).

In developed countries such as the United States, the United Kingdom, and some European Union members, large-scale waste exports continue despite bans or restrictions under the Basel Amendment, which prohibits hazardous waste exports. Legal loopholes are often exploited by disguising waste as second-hand goods, particularly in the case of electronic waste (e-waste), where a clear distinction between genuinely reusable products and obsolete items remains difficult to enforce. This exposes a fundamental shortcoming of the Basel Convention, which does not yet provide detailed regulation to differentiate between the two. On the other hand, receiving countries in the Global South often lack adequate infrastructure or monitoring capacity, thereby becoming dumping grounds for illegal waste—ranging from plastics and e-waste to second-hand textiles and medical waste. West African states such as Ghana and Nigeria, for example, remain major destinations for e-waste dumping, with severe consequences for human health and the environment, despite their ratification of the relevant international agreements.

The imbalance between the capacities of waste-exporting and waste-receiving countries reflects the structural inequalities embedded in the global waste trade. Although states, as subjects of international law, formally possess equal rights and obligations, in practice developed countries often dominate waste flows, while developing countries bear the heaviest impacts. Legal instruments such as the Basel and Bamako Conventions were originally designed to regulate, restrict, or even prohibit such practices in the pursuit of environmental justice. However, the effectiveness of these conventions largely depends on political commitment, enforcement capacity, and inter-state cooperation. For this reason, updating the international legal framework to make it more adaptive, alongside strengthening the institutional capacity of developing countries, is essential to ensure waste management that is fair, sustainable, and non-discriminatory.

## Conclusion

Developed countries often exploit environmental issues and “green” policies to maintain their dominance over the Global South. The phenomenon of waste colonialism reflects how environmental protection priorities often favor the powerful, while marginalized communities become the primary victims—thus reinforcing structural inequality and dependency. The trade of waste from the Global North to the Global South represents a form of ecological colonialism and systemic environmental racism. This practice turns countries in Asia and Africa into "global dumping grounds," where wealthy nations shift the ecological burden created by their own consumption and production patterns.

Seemingly progressive environmental issues and "green" policies are often strategically employed by developed countries to create new relations of domination and dependency over developing nations. This phenomenon, known as toxic colonialism, not only results in severe environmental degradation and health crises in recipient countries but also exposes structural injustice, where environmental protection is prioritized only for those with power and resources. Thus, waste trade is not merely an economic transaction but an instrument of domination that perpetuates global inequality.

In response to such exploitative practices, the international community has developed various legal instruments, with the Basel Convention (1989) serving as the main framework for regulating the transboundary movement of hazardous waste. However, regulatory loopholes and weak enforcement mechanisms have allowed these practices to persist. As a form of resistance and correction to the weaknesses of the Basel Convention, African countries initiated the Bamako Convention (1998), which explicitly prohibits the import of all types of hazardous waste into Africa. Despite the existence of these two legal frameworks, their effectiveness depends heavily on the political commitment and enforcement capacity of each country. Therefore, it is crucial to strengthen binding international legal instruments, enhance the technical capacity of developing countries, and implement effective Extended Producer Responsibility (EPR) principles to achieve a fair, sustainable, and ecologically just global trade system.

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# China's Dual Identity and Its Discourse Toward the EU's Carbon Border Adjustment Mechanism: A Constructivist Analysis (2021-2024)

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*The European Union's Carbon Border Adjustment Mechanism (CBAM) affects China's export interests and provides a stage for identity performance in policy discourse. This article examines how China's dual identity—as a developing country and as a responsible major power—structures its assessment of CBAM and its implied responses. Using qualitative content analysis with a MIC-mini coding scheme, the study analyzes 41 elite and semi-mass texts and translates four variables (Self, Other, Valence, Action) into comparable indicators, including the Identity Salience Index (ISI), Average Valence Score (AVS), and Action Orientation (AOR), under a 60 percent dominance rule. Findings show stronger responsible major power framing in 2023, a persistently negative tone that becomes more legal and procedural, and action signals that shift from protest toward technical coordination. Developing country references persist, preserving flexibility between equity claims and rule-shaping. The study offers a replicable way to quantify identity in discourse and to link identity emphasis to tone and implied action.*

***Keywords:*** *China; dual identity; policy discourse; action orientation, Identity Salience Index, Average Valence Score*

## Introduction

The European Union's Carbon Border Adjustment Mechanism (CBAM) links import charges to embedded emissions and is now part of EU customs law. The core regulation was adopted in 2023; a reporting-only transitional phase began on 1 October 2023; and financial obligations are scheduled to follow. For China, CBAM is not only a technical instrument but also a stage where the government must defend market access while presenting a coherent self-image to international audiences. This article examines

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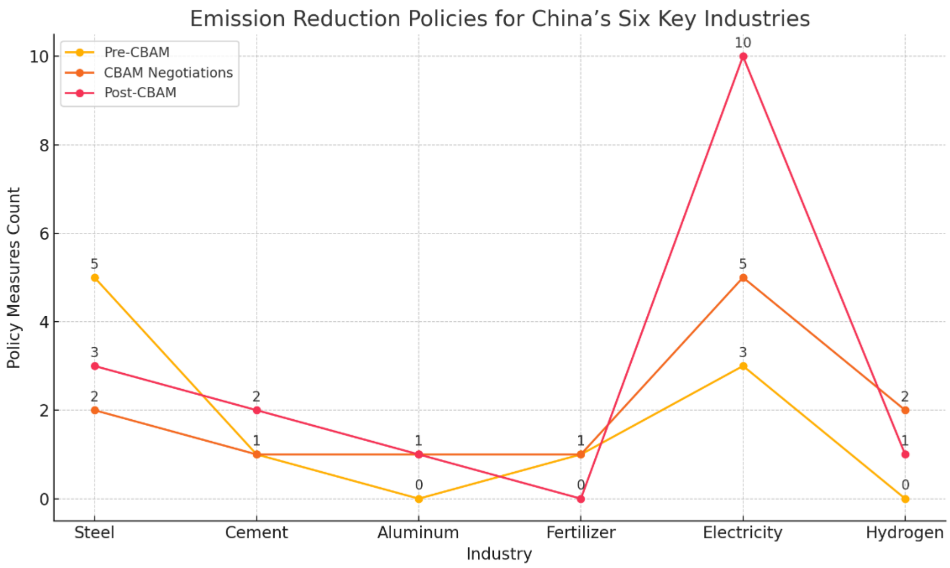
how China's dual identity—as a developing country and as a responsible major power—structures its discourse and policy preferences toward the EU's CBAM in 2021–2024.

Figure 1: Emission Reduction Policies for China's Six Key Industries




Source: Geng et al. 2025, Fig. 8; visual adapted by author

Figure 1 summarizes China's domestic decarbonization measures across six CBAM-relevant industries in three periods: pre-CBAM, the negotiation phase in 2021–2022, and the post-announcement period. The concentration of activity in electricity, with smaller shifts in fertilizer and steel, suggests selective adjustment at home while external criticism of CBAM continues. This juxtaposition makes identity a useful analytic entry point.

Constructivist theory holds that state identities shape interests and define which actions are seen as appropriate. In China's case, a developing-country script foregrounds equity and distributive fairness, while a responsible-major-power script emphasizes stewardship, credibility, and engagement with multilateral rules. These scripts are performed situationally and can be combined. The former legitimates resistance to perceived extraterritorial effects or disguised protectionism; the latter sustains claims to leadership in climate governance.

Beyond the two scripts emphasized here, China is often portrayed as a green-technology powerhouse—specifically dominant in renewable deployment and increasingly active in shaping technical standards. This facet can reinforce a responsible-major-power performance by supplying material credibility for rule-shaping claims. It can also complicate CBAM politics by positioning China not only as a rule-taker but also as an aspiring rule-maker in carbon accounting and industrial decarbonization.

The study analyzes elite and semi-mass Chinese texts on CBAM across 2021–2024. Identity is operationalized with a compact, replicable coding approach that converts discourse into comparable indicators. Full operational details are provided in the Methodology section. The premise is straightforward: China's CBAM discourse is best read as a calibrated performance that toggles between the two identity scripts rather than a linear shift from rejection to cooperation.

This design complements work that explains opposition to CBAM mainly through material exposure or institutional variables. By measuring when and how identity emphases change, and by linking those shifts to tone and implied action, the article provides year-on-year evidence of discursive calibration. The guiding question is: How, and to what extent, does China's dual identity shape its discourse and policy preferences toward the EU's CBAM during 2021–2024?

## Methodology

This study uses qualitative content analysis with a structured identity-coding instrument adapted from the Making Identity Count approach. The goal is to convert China's CBAM discourse into reproducible indicators of identity emphasis, tone, and implied action.

The corpus comprises 41 documents selected to capture official and agenda-setting voices without redundancy. Elite sources include ministry press briefings, joint statements, leadership speeches, and state-affiliated think-tank papers. Semi-mass sources include central party newspapers and key English-language outlets that act as public-diplomacy amplifiers. Selection criteria were: direct relevance to CBAM, attributable Chinese authorship or institutional voice, and sufficient textual density for coding.

Table 1: Document Corpus Distribution by Source and Year (2021-2024)

| **Source Type** | **2021** | **2022** | **2023** | **2024** | **Total** |
|---|---|---|---|---|---|
| Elite | 6 | 6 | 6 | 4 | 22 |
| Semi-mass | 5 | 5 | 6 | 3 | 19 |
| **Total** | **11** | **11** | **12** | **7** | **41** |

Source: Author's compilation of elite & semi-mass texts (2021-24 corpus)

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The unit of analysis is the excerpt at the sentence or short-paragraph level. Each excerpt is coded on four variables:

- SELF: Developing Country (DC) or Responsible Major Power (RMP) indicators in how China presents itself.
- OTHER: Role ascribed to the EU, categorized as Partner, Competitor, or Rule-breaker.
- Valence → CBAM: Sentiment toward CBAM coded as +1, 0, or −1.
- Action: Implied policy orientation on an ordinal scale where higher values indicate more engagement. Exact categories used in this study are shown in Table 2.

The coder applied a dominance rule of at least 60 percent. When multiple cues were present, the majority cue determined the code for that excerpt in SELF, Valence, and Action. Ambiguous excerpts were left uncoded on the relevant variable.

Table 2: MIC Coding Variables and Analytical Rationale

| Variable | Coding Options | Mandarin Cue Examples |
|---|---|---|
| **SELF** | • Developing Country (DC)<br>• Responsible Major Power (RMP)<br>• SELF_MULTI = TRUE (if both identities appear in a single text) | • “中国是最大的发展中国家”<br>• “坚持共同但有区别的责任”<br>• “中国展现大国担当”<br>• “积极参与全球气候治理” |
| **OTHER** | • Partner (1)<br>• Competitor (2)<br>• Rule-breaker (3)<br>• None (0) | • “欧盟是我们重要的合作伙伴”<br>• “与欧盟存在竞争关系”<br>• “单边主义”<br>• “气候保护主义”<br>• “碳殖民主义” |
| **Valence → CBAM** | • **+1** = Positive<br>• **0** = Neutral<br>• **–1** = Negative | • Positive: “中国欢迎欧盟的绿色转型”<br>• Neutral: “中国正在评估CBAM的影响”<br>• Negative: “CBAM违反世贸规则 |

| Variable | Coding Options | Mandarin Cue Examples |
|---|---|---|
| | | ”<br>• “人为设置绿色贸易壁垒” |
| **Action** | • **1** = Reject<br>• **2** = Negotiate<br>• **3** = Co-operate<br>• **4** = Alternative Proposal | • Reject: “坚决反对碳边境税”<br>• Negotiate: “**中欧**应通过对话解决分歧”<br>• Cooperate: “**中欧将共同推**进气候治理”<br>• Alternative Proposal: “**推**动建立公平合理的碳市场机制” |

Source: Author’s elaboration, adapted from the Making Identity Count (MIC) framework

To summarize patterns across the corpus, the following indices are calculated:

Table 3: Index formula

| **Index** | **Mathematical expression** | **Interpretation** |
|---|---|---|
| **Identity Salience Index (ISI)** | $\mathrm{ISI} = 1 + \frac{n_{\mathrm{RMP}} - n_{\mathrm{DC}}}{n_{\mathrm{RMP}} + n_{\mathrm{DC}}}$ | Shows whether Responsible-Major-Power (RMP) identity or Developing-Country (DC) identity dominates. Values < 1 signal a DC tilt; values > 1 signal an RMP tilt. |
| **Average Valence Score (AVS)** | $\mathrm{AVS} = \frac{1}{N} \sum_i \mathrm{Valence}_i$ | Mean emotional tone across all statements, ranging from –1 (negative) to +1 (positive). |
| **Proportion of Negative Valence (PropNeg)** | $\mathrm{PropNeg} = \frac{\mathrm{count}(\mathrm{Valence} = -1)}{N}$ | Share of statements that are explicitly negative. |

| Index | Mathematical expression | Interpretation |
|---|---|---|
| **Average Action Orientation (AOR)** | $\mathrm{AOR} = \frac{1}{N} \sum_i \mathrm{ActionCode}_i$ | Mean level of policy response, where higher codes reflect stronger or more forward-leaning actions. |

Source: Author’s calculations, MIC-mini dataset

Legend

- nRMP : Number of excerpts framing China as a Responsible Major Power.
- nDC : Number of excerpts framing China as a Developing Country.
- N : Total number of coded excerpts or paragraphs in the dataset.
- $\mathrm{Valence}_i$ : Sentiment score of excerpt i (–1 = negative, 0 = neutral, +1 = positive). count(Valence=−1): Total excerpts with negative valence.
- $\mathrm{ActionCode}_i$ : Coded strength of action in excerpt i (e.g., 0 = none, 1 = reject, 2 = negotiate, 3 = co-operate).

Reliability is addressed through a three-step procedure. First, a short calibration is conducted on a small set of excerpts to finalize cue lists and lock the codebook before the main coding pass. Second, a blind recode of a stratified subsample—that includes both elite and semi-mass sources—is carried out without access to prior labels. Third, percent agreement and Cohen’s kappa are calculated for SELF, OTHER, Valence, and Action, and κ is interpreted using standard benchmarks. All disagreements are recorded in an adjudication memo; the relevant cue definitions are clarified where necessary; and the final dataset is corrected to limit coder drift. Throughout the process, an audit trail is maintained so that all coding decisions are traceable.

Validity is handled through theory alignment, corpus balance, and transparency. Construct validity is ensured by mapping core identity claims and role conceptions directly to operational cues in the codebook. Content validity is maintained by applying clear inclusion and exclusion rules and by balancing elite and semi-mass sources to avoid over-representation of any single channel. Face validity is supported by coder memos that document difficult cases and the reasoning for final labels. As a robustness check, sensitivity around the 60 percent dominance threshold is tested, and any material changes

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are reported in the Results section. All materials required for replication—including the codebook, cue lists, and adjudication notes—are preserved.

The full dataset, codebook, and reliability test results are preserved and openly accessible at:

https://docs.google.com/document/d/16zE3dRuUJ6ItEbHW3106Lzl5scWC_QmT/edit?usp=drive_link&ouid=115462312708092708918&rtpof=true&sd=true

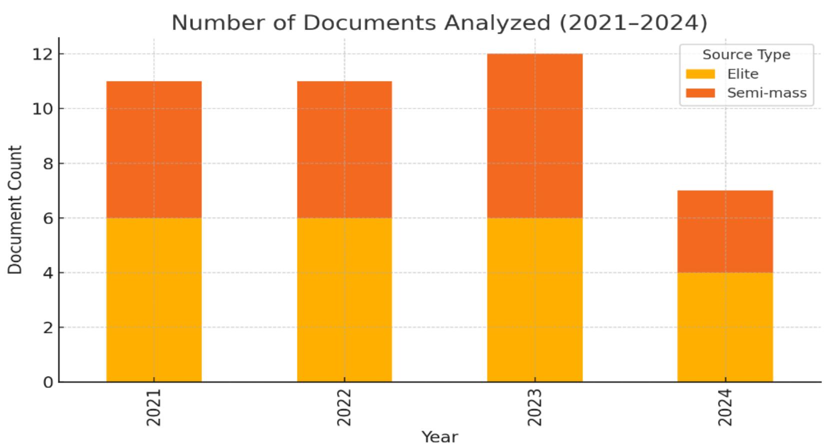
To maintain analytical parsimony, this study focuses on two primary identity scripts—China as a Developing Country and as a Responsible Major Power. Discursive cues related to green-technology leadership—such as references to standard-setting, technological cooperation, or emissions-measurement templates—are interpreted as facets of the Responsible Major Power script rather than as a distinct identity category. This choice reflects the study's aim to capture dominant and recurring role conceptions without over-fragmenting the identity repertoire.

In addition, the inclusion of both elite and semi-mass sources is not treated as discursive noise but as analytically meaningful. Semi-mass outlets function as amplification channels through which officially sanctioned signals are stabilized, disseminated, and made legible to multiple audiences. This design allows the analysis to assess not only elite articulation but also how identity-consistent signals are reproduced across China's broader communicative environment.

## Discussion

### *Overview*

Figure 2. Corpus overview and discourse landscape




Source: Author's corpus log (2021-24)

Official statements were first compiled into a chronological timeline from the issuing authorities' primary portals. Eligible items included ministry press conferences and readouts, leadership speeches, regulations and policy notices, and think-tank papers released under ministerial or commission auspices. For each document, the title, issuing body, canonical URL, document type, and publisher timestamp were recorded. When parallel Chinese and English versions existed, the Chinese original served as the reference text, and the English version was consulted for clarity checks. Duplicate postings across portals were collapsed to a single record under the issuing authority. Syndicated reprints and brief news flashes without substantive content were excluded to keep the timeline authoritative and analytically useful.

The timeline then served as the anchor for balancing the corpus with semi-mass discourse. For each cluster of official statements, contemporaneous coverage and commentary were sampled from agenda-setting outlets to capture diffusion and reframing outside the narrow official channel. Selection prioritized original bylines and site-of-record pages and filtered out agency wire copy or mirror posts. To avoid over-representation, the sample limited the number of texts per outlet within a cluster and sought diversity across genres and audiences.

This balancing emphasized outlets that structure China's public discourse. People's Daily and Xinhua provide the Party line and the national wire. Global Times amplifies elite cues with sharper language that often travels internationally. Qiushi codifies ideological framing and clarifies preferred formulations. China Daily in English targets foreign readers and translates core positions into legal and procedural narratives. Semi-official policy briefs from iGDP, CASS, and comparable institutes bridge political messaging and implementable options. Together, the official timeline and the semi-mass sample produce a corpus that reflects both authoritative signals and their public amplification, which is the landscape visualized in Figure 2.

### *Identity Salience*

Identity emphasis shifts across the corpus. The Identity Salience Index (ISI) starts at 0.00 in 2021, then moves above 1 from 2022 onward (1.14 in 2022, 1.56 in 2023, 1.20 in 2024). This indicates a clear tilt toward responsible-major-power framings after the first year, with the strongest tilt in 2023.

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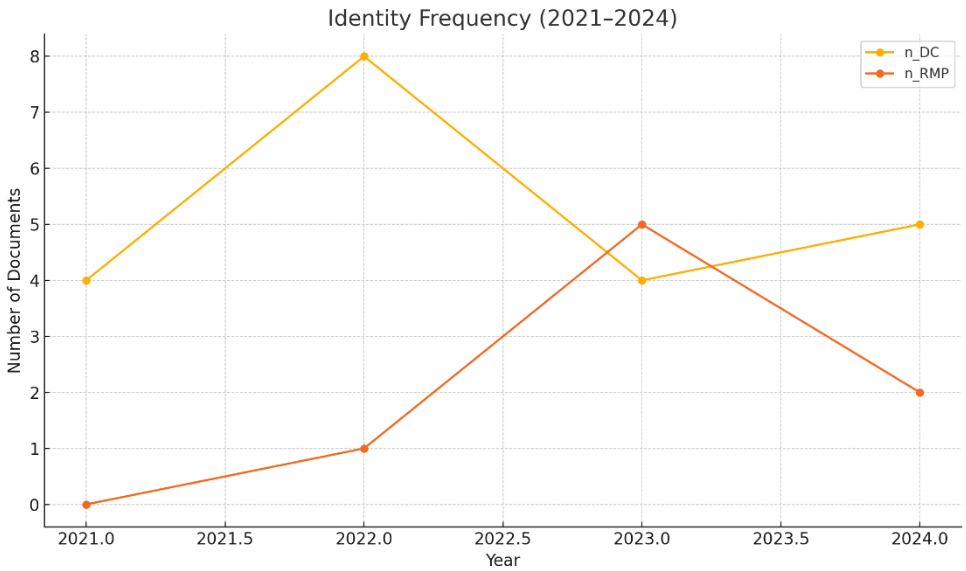
Figure 3: Identity Frequency in China's CBAM Discourse (2021-2024)




Source: Author's coding results, MIC-mini (n = 41)

Key quantitative takeaways: References to the Responsible Major Power identity climbed from 1 in 2022 to 5 in 2023, signaling a bid to shape climate rules rather than seek exemption as a developing country (see Table 4: n_RMP). The tone stayed negative throughout, but from 2022 the rhetoric became more procedural and legalistic (see Figure 4 and Table 4: AVS < 0 each year). Action Orientation (AOR) moved from protest toward engagement, peaking at 2.17 in 2023 when criticism coexisted with technical proposals and WTO consultations (see Table 4: AOR). Developing-country cues never disappeared, which indicates identity duality remains available as a strategic resource (see Figure 3: n_DC never falls to zero).

Table 4: Cross-Year Metric Snapshot (2021-2024)

| **Indicator** | **2021** | **2022** | **2023** | **2024** |
|---|---|---|---|---|
| n_DC | 4 | 8 | 4 | 5 |
| n_RMP | 0 | 1 | 5 | 2 |
| ISI[1] | 0.00 | 1.14 | 1.56 | 1.20 |
| AVS | −0.91 | −0.73 | −0.67 | −1.00 |
| AOR | 0.82 | 1.36 | 2.17 | 2.00 |

Source: Author's calculations, MIC-mini dataset (2021-24)

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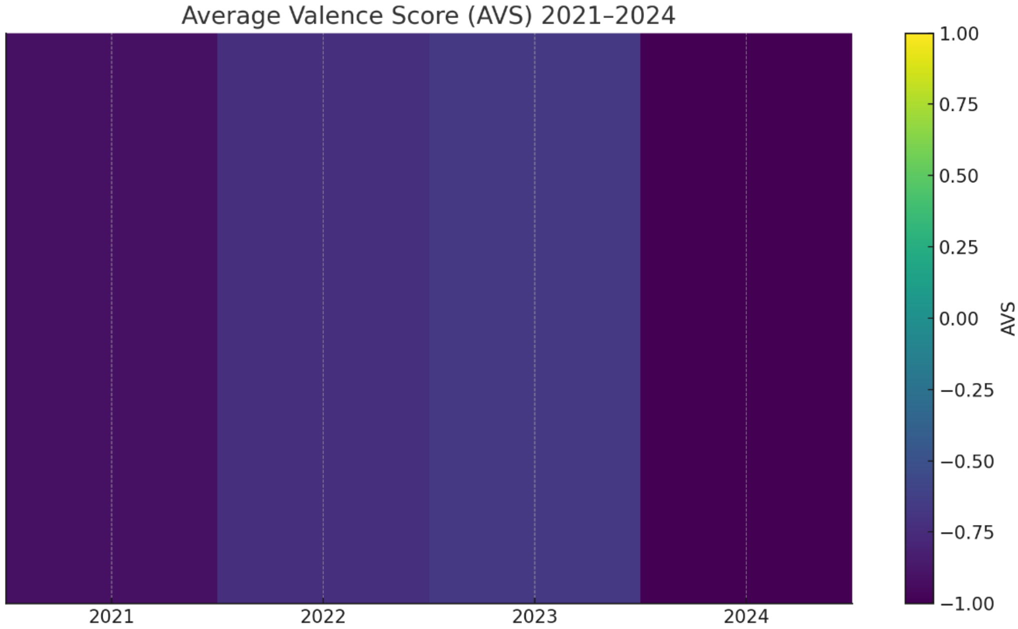
*Valence*

Figure 4: Average Valence Score (AVS) of China's CBAM Discourse




Source: Author’s sentiment scores, MIC-mini (2021-24)

Although the register is persistently critical, its content shifts over time. In 2022 the negative tone begins to rely less on moral condemnation and more on legal and procedural claims, including references to WTO consistency and extraterritorial effects. The dip in negativity in 2023 (AVS −0.67 in Table 4) aligns with this procedural turn, as texts devote more space to arguing defects in design and implementation rather than questioning intent. By 2024 the evaluative stance hardens (AVS −1.00 in Figure 4), even as the vocabulary remains largely legalistic.

It is important to read AVS alongside the action indicator. A negative AVS reflects the evaluative language toward CBAM specifically, not toward EU relations in general, and it does not preclude forward-leaning behavior. As shown in the Action Orientation discussion and Table 4, texts can maintain a negative tone while simultaneously signaling engagement through references to consultations, verification templates, and other technical processes. This decoupling between tone and implied action is a core feature of the discourse captured here.

*Action Orientation*

The Action Orientation (AOR) summarizes how texts signal intended behavior, using an ordinal code in which higher values indicate more engagement. In this corpus the sequence rises from 0.82 to 1.36, peaks at 2.17 in 2023, then settles at 2.00 in 2024. Read substantively, this marks a movement from rejection-leaning signals toward negotiation and practical coordination, while the overall register remains critical. The exact values are reported in Table 4 (row "AOR").

Higher AOR scores reflect a shift in the implied playbook. Lower codes center on outright refusal, warnings of retaliation, or blanket condemnations of CBAM. Mid-range codes emphasize legal contestation, invitations to dialogue with the EU, and appeals to multilateral forums to adjust design details. Upper-range codes foreground concrete engagement such as working-level consultations, technical alignment on measurement and reporting, and proposals to coordinate sectoral transitions.

A key feature is the decoupling of tone and behavior. AVS remains below zero across the corpus, yet action signals become more forward-leaning, indicating a strategy that protects equity claims for domestic and global audiences while seeking to shape implementation in practice. In channel terms, elite outlets introduce the language of coordination and legal-procedural engagement, and semi-mass or semi-official venues amplify these cues with references to consultations, expert dialogues, and technical workstreams. This pairing of principled criticism with operational signals is what the AOR metric captures, and it is visible alongside the other indicators summarized in Table 4.

For transparency, the intra-coder reliability summary is reported below. It lists percent agreement and Cohen's kappa for SELF, OTHER, Valence, and Action, plus the overall figure.

Table 5: Intra-Coder Reliability

| Variable | Matches | % Agreement | Approx. κ | Interpretation |
|---|---|---|---|---|
| SELF | 14 / 16 | **87.5%** | ≈ 0.78 | **Substantial** |
| OTHER | 16 / 16 | 100% | 1.00 | Perfect |
| Valence | 15 / 16 | 93.8% | ≈ 0.82 | Almost perfect |
| Action | 15 / 16 | 93.8% | ≈ 0.91 | Almost perfect |
| **TOTAL** | **60 / 64** | **93.75%** | **≈ 0.88** (pooled) | Almost perfect |

Source: Author's calculations (intra-coder recode subsample, MIC-mini dataset)

As shown in Table 5, an intra-coder reliability check was conducted on a stratified subsample of 16 documents (about 39% of the 41-document corpus), balanced by year and source type with four documents per year. After a two-week wash-out period the same coder reapplied the MIC-mini scheme. Table 5 reports 60 of 64 variable-level judgments matching the original labels, yielding 93.75% agreement and a pooled Cohen's $\kappa \approx 0.88$, which Landis and Koch classify as almost perfect. By variable, OTHER = 100% ($\kappa = 1.00$), Action = 93.8% ($\kappa \approx 0.91$), Valence = 93.8% ($\kappa \approx 0.82$), and SELF = 87.5% ($\kappa \approx 0.78$; substantial). The four discrepancies summarized in Table 5 (two in SELF, one in Valence, one in Action) reflect nuanced interpretive differences rather than systematic error. Since overall reliability exceeds the common 0.60 threshold for single-coder studies, the coding can be considered stable and methodologically sound.

### *Alternative explanation: signaling*

An alternative interpretation is that China's CBAM discourse reflects strategic signaling rather than identity performance, facilitated by the party-state's capacity to discipline public communication. If CBAM rhetoric were primarily a bargaining strategy, we would expect evaluative framing to converge toward a more positive tone as procedural engagement deepens. The findings, however, show a different pattern: while action orientation increasingly shifts toward engagement, coordination, and technical participation, evaluative framing remains consistently negative. This combination is more consistent with a dual identity repertoire in which critical discourse sustains legitimacy with domestic and Global South audiences, while procedural engagement advances implementation-oriented interests. Rather than ruling out signaling entirely, the evidence suggests that signaling operates through selectively activated identity-based role scripts rather than purely instrumental rhetoric.

## Conclusion

China's response to the EU's CBAM reads as a managed balance between two usable identities. Developing-country framing sustains equity claims and domestic legitimacy, while responsible-major-power framing enables legal and procedural engagement. The indicators in the paper show a decoupling of tone and behavior: language remains critical, yet the implied playbook becomes more practical, moving from protest toward coordination.

The pivotal year is 2023. Table 4 records the strongest tilt toward the responsible-major-power script that year and the peak AOR = 2.17, while Figure 3 shows the jump in responsible-major-power references and Figure 4 confirms that tone stays negative even as process-oriented arguments expand. This inflection aligns with the prior policy activity visible in Figure 1, where domestic decarbonization efforts concentrate in key sectors. Read together, these patterns suggest a two-level adjustment: CBAM is resisted discursively on fairness grounds, yet implementation is quietly shaped through legal and technical channels.

This study does not deny the presence of strategic signaling in China's CBAM discourse; rather, it shows that signaling operates through an identity-based repertoire in which critical evaluation and procedural engagement coexist. Future research could extend this framework by testing whether green-technology leadership constitutes a distinct identity script or remains embedded within the Responsible Major Power role across different climate governance arenas.

The practical implication is clear: Progress is most likely through legal-procedural avenues and technical workstreams on measurement, reporting, and verification, as well as sectoral roadmaps that limit trade friction. For China, pairing equity rhetoric with concrete proposals strengthens credibility while preserving developing-country solidarity. Coding stability supports these inferences, with reliability documented in Table 5.

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# Jokowi and Xi's Anti Corruption: Commonalities and Distinctiveness

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*Our paper attempts to address two main questions. First, what anti-corruption strategies did the two presidents employ to exercise their power and maintain legitimacy, which were crucial for their presidencies: Xi Jinping from 2012 to the present, and Joko Widodo (Jokowi) from 2014 to 2024? We are particularly interested in discussing in greater depth why Xi and Jokowi adopted these strategies. Second, what is the outlook for anti-corruption measures in the near future—for Jokowi until the end of his term in 2024, and for Xi, who faces no term limit after centralizing power under his leadership? We argue that Xi Jinping's anti-corruption campaign primarily targeted political corruption in order to realize his "Chinese Dream" by creating a more certain and stable domestic environment, made possible after he successfully centralized power. In contrast, Jokowi's first term had to navigate a more dynamic domestic political environment. Although, at the beginning of his presidency, he was perceived as an anti-corruption politician and acted in adherence to principles of good public governance—namely transparency and accountability—Jokowi's second term saw a shift in his anti-corruption stance. His governing priorities no longer emphasized transparency and accountability but instead focused on economic development per se. This comparative study seeks to provide a deeper understanding of the relationship between anti-corruption strategies, power consolidation, and political legitimacy in presidential regimes that differ significantly in their institutional characteristics.*

***Keywords:*** *Anti corruption, political corruption, comparative case of China and Indonesia, corruption, China, Indonesia, Xi Jinping, Joko Widodo*

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## Introduction

*"Fight corruption too little and destroy the country; Fight corruption too much and destroy the party."* - Chen Yun

*"Dad, I am so afraid that you have an intention to corrupt."* - Pramoedya Ananta Toer

Chen Yun, a veteran leader, and Pramoedya Ananta Toer[1], a prolific writer, shared idiosyncratic thoughts on the problematic choices that China and Indonesia must confront when curbing corruption. The former summed up the dilemma facing the People's Republic of China (PRC), primarily for the Chinese Communist Party (CCP). The latter was drawn from his novel entitled Korupsi (Corruption), published in 1954, just a few years after the Republic of Indonesia's independence.

Our article aims to describe and discuss the anti-corruption strategies adopted by the presidents of the two most populous countries: the People's Republic of China and the Republic of Indonesia—President Xi Jinping (hereafter Xi) and former President Joko Widodo (hereafter Jokowi). By "strategy," we do not necessarily mean a comprehensive policy; in a general sense, strategy refers here to concrete actions. Our paper also seeks to explain contemporary leadership in China and Indonesia. We focus our attention on political corruption rather than bureaucratic corruption. In its basic notion, corruption is the misuse of public funds for personal gain; however, this definition often focuses too narrowly on the use of public money or taxpayers' funds in a country's state budget.

Jokowi pledged the Nawacita—nine goals centered on "sovereignty, self-reliance, and strength through mutual cooperation." Campaign promises transformed into governmental programs showed the path that the country had to follow to improve the welfare of its people (Kuncoro, 2019). By promising and campaigning on the Nawacita (from Sanskrit "nawa," meaning nine, and Indonesian "cita," meaning pledge or aspiration), Jokowi won two consecutive elections in 2014 and 2019, defeating the same challenger—Prabowo Subianto—in both. Prabowo Subianto is now the eighth President

[1] Pramoedya Ananta Toer was ever jailed by Soeharto regime due to his past encounter with Lekra (an underbow of Indonesia Communist Party – *Partai Komunis Indonesia*). He was renowned for his tetralogy masterpiece of fourth novel book and was few time nominated for winning Nobel Prize for Literature, here is link from Al Jazeera: https://www.aljazeera.com/indepth/features/2017/02/pramoedya-ananta-toer-170206053453639.html#:~:text=Pramoedya%20was%20nominated%20for%20the,his%20literary%20attachment%20to%20women.

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of Indonesia, having won the 2024 election running alongside Jokowi's son, Gibran Rakabuming Raka, as his vice-presidential candidate.

His victory was interpreted as a sign that democracy had survived. One reason for this was that his challenger, Prabowo, was supported by machine politics, a divisive populist campaign laced with chauvinistic rhetoric, and substantial funding from numerous conglomerates. In contrast, Jokowi relied on grassroots volunteerism and a moderate tone centered on his campaign promises—the Nawacita. And the rest, as they say, was history: "democracy survived" (Mietzner, 2014).

Xi ascended to the Politburo Standing Committee (PBSC)—the highest organ of the CCP—at the 18th Party Congress, amid significant political drama preceding the event. We draw on Dreyer's analysis (2019:135), which suggested that the fifth-generation succession appeared assured. However, unexpected events unfolded with the arrest of PRC princeling Bo Xilai, who had been regarded as well-positioned to join the PBSC and potentially rise to lead the party and government as the next PRC president. The scandal was triggered when Bo's close aide, Wang Lijun, sought refuge at the U.S. Consulate in Chengdu (Miller, 2023).

After Xi successfully consolidated power, he introduced the "Chinese Dream" in late 2012.[2] It encompassed a set of personal and national ideals within Chinese society. Later, the "Chinese Dream" was used by journalists, government officials, and activists to describe both the role of the individual in Chinese society and the goals of the Chinese nation. Xi can be considered a princeling, as his father, Xi Zhongxun, was a prominent communist revolutionary and veteran leader.[3]

Since 2012, Xi has held three key positions simultaneously: General Secretary of the CCP, President of the People's Republic of China (PRC), and Chairman of the Central Military Commission (head of the People's Liberation Army, PLA). This concentration of power in his hands has been described using the phrase "triple crown" or "triple majority position," making him an exceptionally powerful leader. This situation evolved further with the CCP establishing him as the "core" of the leadership and, in practice, "Chairman of Everything." Ultimately, Xi consolidated his power and demanded loyalty both to himself and to the party.

[2] Detail of Chinese dream can be found from this link: https://en.wikipedia.org/wiki/Chinese_Dream
[3] Story from https://en.wikipedia.org/wiki/Xi_Zhongxun#:~:text=Xi%20Zhongxun%20died%2024%20May,Shaanxi%2DGansu%20border%20region.%22

In contrast, Jokowi began his political career as mayor of Solo, a small city in Central Java. He later served as governor of Jakarta, the capital of Indonesia, for only two years before his party pushed him to run in the 2014 presidential election. He was nominated by the Indonesian Democratic Party of Struggle (PDI-P), though he was not originally a senior party official. Unlike Xi, who rose through the Politburo Standing Committee (PBSC), Jokowi was not the most powerful figure within PDI-P. This phenomenon—Jokowi's relative lack of initial power—has been termed his "triple minority position" (Muhtadi, 2015).

To provide a general overview, we present Table 1 below, which compares China and Indonesia on selected indicators: population, Corruption Perception Index (CPI) from Transparency International, Gross Domestic Product (GDP) growth in real percentage terms, and Ease of Doing Business (EODB) from the World Bank. The EODB is considered a key index for global investors evaluating foreign investment opportunities. As a rule of thumb, a higher Ease of Doing Business ranking indicates a regulatory environment more conducive to starting and operating a local firm. The rankings are determined by sorting aggregate scores across 10 topics, with each topic receiving equal weight.[4]

Table 1: Selected Comparison China and Indonesia

| Comparable Indicators | China | Indonesia |
|---|---|---|
| Population | 1,397,897,720 (July 2021 est.) | 275,122,131 (July 2021 est.) |
| Corruption Perception Index (CPI) Transparency International rank and score (below) | 76/180<br>(43/100) | 99/180<br>(37/100) |
| GDP - real growth rate | 6.14% (2019 est.)<br>6.75% (2018 est.)<br>6.92% (2017 est.) | 5.03% (2019 est.)<br>5.17% (2018 est.)<br>5.07% (2017 est.) |
| Rank of Ease of Doing Business (EODB) World Bank[5] | 31 of 190 | 73 of 190 |

Source: https://www.indexmundi.com/factbook/compare/china.indonesia, CPI from Transparency International and EODB from World Bank

[4] Source: https://www.doingbusiness.org/en/rankings?region=east-asia-and-pacific
[5] Doing Business Report has been discontinued since 2021 by the World Bank. As a replacement, starting in 2024 the World Bank introduced a new survey called Business Ready (B-READY) to evaluate the business climate

We propose two main questions for discussion. First, what are the commonalities and differences in the anti-corruption strategies that the two presidents employed to exercise their power and maintain legitimacy during their presidencies—Xi Jinping from 2012 onward and Joko Widodo (Jokowi) from 2014 to 2024? And why did they adopt these strategies? We argue that the terms "commonalities" and "distinctiveness" are standard phrases for comparing factors across two different cases. These terms should be easily understood.

Second, what is the outlook for anti-corruption measures in the near future—for Jokowi up to the end of his term in 2024, and for Xi, who faces no term limit due to the constitutional amendment? Our argument positions the two countries and their leaders as a "most different systems" design. It culminates in the question: Why did both leaders use anti-corruption agendas to build legitimacy despite their differing political systems?

Samuel Huntington, in his classic book Political Order in Changing Societies (1968: 64), argued that "corruption provides immediate, specific, and concrete benefits to groups which might otherwise be thoroughly alienated from society. Corruption may thus be functional to a political system in the same way that reform is." By utilizing Huntington's argument, one must consider the functionality of corruption in any political system (democracy or autocracy) as crucial, even when pursuing reform policies.

## Analytical Framework

A large and growing body of literature has investigated corruption, leadership, and the impact of national leaders' policies on anti-corruption efforts. Historically, research on corruption has focused on politico-economic phenomena. For instance, the classic work by Rose-Ackerman (1978) framed corruption as a problem in political economy, applying an economic framework of agency problems or relationships and functional bribery, summarized by the phrase "quid pro quo" (meaning "something for something").

Several distinct features of bureaucratic corruption are considered petty corruption, "administrative" in style—meaning officials deal with power granted by the state, and corrupt actors behave like thieves worried about getting caught. However, political corruption's key distinct features can be considered grand corruption, with more political nuance, and it relates to bribery rather than theft.

Empirically, Jones and Olken (2005) presented findings of robust evidence that leaders matter for economic growth. Their results suggested that the effects of individual leaders are strongest in autocratic settings, where there are fewer constraints on a leader's power. They added that leaders also appear to affect policy outcomes, particularly monetary policy. Their work is important here for highlighting the enduring debate over the relative roles of individuals and deterministic forces in shaping historical outcomes.

There are two contentious schools of thought along these lines. At one extreme, Leo Tolstoy in his book War and Peace introduced a historical theory perhaps most dismissive of leaders, seeing so-called historic figures as mere ex post justifications for events wholly beyond any individual's influence (Berlin, 1978; Jones and Olken, 2005). Besides Tolstoy, Karl Marx in The Eighteenth Brumaire of Louis Napoleon (1852) offered some minimal agency for leaders but argued that leaders must choose from a historically determined set of choices, meaning they have much less freedom to act than they think they do. If we follow Tolstoy and Marx's stance, leaders typically claim immodest powers, although they are in fact of little consequence (Jones and Olken, 2005: 838).

In contrast to Tolstoy and Marx, there is the absolutist extreme in which individuals are seen as the decisive influences in history—the so-called "Great Man" view. From this perspective, the evolution of history is largely determined by the idiosyncratic, causative influences of certain individuals, perhaps a very small number (Jones and Olken, 2005). Both writers later gave the example of Max Weber (1947), who saw a role for "charismatic" leadership in certain circumstances—one may describe charismatic leadership as an ideal type. Weber allowed for possibly substantial individual roles, but only in cases where the national bureaucracy or traditional social norms do not stand in the way of the individual. For Weber, individuals, historical forces, and institutions are all important, and they interact in significant ways (Jones and Olken, 2005).

Then, how do these two contentious schools of thought—on whether leaders matter or not—relate to understanding contemporary leadership in China and Indonesia? The bottom line for both leaders is their promises to the people—the "Chinese Dream" and Nawacita—to be delivered within specific time frames. With the issue of rampant corruption (political corruption in this case), it could somehow derail their promises along the way, making the "Chinese Dream" deliver only as a dream and Nawacita only as "cita" (aspiration). Moreover, there are contending views in the literatures on economics and political science: Is corruption evil, or not evil (even acceptable or good)?

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Economists who study corruption argue that it reduces investment and slows growth (Seligson, 2002). Besides this argument, there is a strong consensus, based on considerable empirical evidence, that corruption has negative economic consequences. This view is reflected in international lending agencies' major efforts to reduce corruption, including conditionality on their loans and widespread initiatives to address the damage caused by corruption (Seligson, 2002).

Table 1 above presents the Corruption Perception Index (CPI) from Transparency International. However, the CPI is highly problematic in its assumption of a single dimension to corruption and its source bias toward multinational businesses, for example. There are alternative systematic measures, but not many (Manion, 2004). We tend to agree with Manion's argument and follow her view that clean government and widespread corruption are described as equilibria (Manion, 2004). By "equilibria," she means that clean government and widespread corruption are equally stable states for everyone involved. It only means that, whatever path led to these alternative outcomes, the structure of the situation—in this case, the corruption rate that defines the two equilibria—reinforces the choices that sustain them.

Manion (2004) illustrates this with a corruption payoff curve, showing how officials' incentives shift as the number of corrupt actors increases. At point A, where very few officials are corrupt, clean transactions yield higher expected returns, making corruption unattractive. As corruption becomes more widespread, expected corrupt payoffs rise and eventually exceed clean payoffs at point B — the tipping point where an official is indifferent between being corrupt or clean. Once past this threshold, corrupt behavior becomes self-reinforcing because each additional corrupt official increases the likelihood of successful rent extraction. If corruption continues to spread to point C, widespread corruption becomes a stable equilibrium.

Following this illustration, the first implication formulates reform as a problem of changing corrupt payoffs; the second, as a problem of changing expectations. A third implication is that reform (changing payoffs, expectations, or both) need not bear the entire burden of creating clean government (Manion, 2004). Enforcement strategies reduce corrupt payoffs by increasing the likelihood that corrupt officials and their accomplices in society are discovered and, when discovered, punished with severity commensurate with the corrupt act (Manion, 2004). In China and Vietnam, officials can be executed for corruption. Yet, in both countries, enforcement is uncertain.

In tackling corruption, China has recognized that crucial reforms are needed to maintain its current rate of economic growth and prevent the economy from collapsing like a house of cards. With the Twelfth Five-Year Plan, the Chinese government set out an ambitious proposal to increase domestic consumption by putting more money in the pockets of the poor. It also addressed economic restructuring and tackled pollution by conserving energy and cleaning up the environment. But corruption has the power to nullify the government’s reform efforts. It hinders development in remote areas and marginalizes the poor. Often, money earmarked for environmental programs disappears without noticeable impact.

One important milestone occurred in 2018 when China established the National Supervision Commission, with the objective of integrating anti-corruption efforts. Deng (2018) examines the consolidation of China's anti-corruption framework from a dual-track system (involving both Party committees and state prosecutors) into a unified National Supervision Commission (NSC). Empirical evidence from pilot reforms in Beijing, Shanxi, and Zhejiang demonstrates that this restructuring merges prosecutorial powers into the Party’s Discipline Inspection Committees, effectively creating a single enforcement agency. Deng argues that while this centralization mitigates interference from local officials, it ultimately entrenches the central Party's leading control rather than fostering independent rule of law, prioritizing internal political supervision over external checks and balances.

When Jokowi was inaugurated as president of Indonesia on October 20, 2014, the new president promised to bring a new style to Indonesian politics, generating optimism among many Indonesians that his government would enthusiastically promote reform. Expectations for reform were high. Against this popular perception of renewed faith in democracy, it took only a few months in office for the Jokowi administration to exhibit elements of democratic regression, amid rising public disappointment (Muhtadi, 2015).

Jokowi seemed to believe that Indonesia’s crackdown on corruption had discouraged some local and national officials from starting new projects and had instilled fear in others that they would be accused of, or even charged with, corruption. Although he had a background as a recipient of the Bung Hatta Anti-Corruption Award, a number of agendas intersecting with good governance and anti-corruption policies were incorporated into the Nawacita. The anti-corruption commitment was at least stated in the Nawacita agenda.

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## Research Method

Our study employs a structured, focused comparative method to systematically examine the causal relationship between anti-corruption strategies, power consolidation, and political legitimacy in China and Indonesia, using a most different systems design logic (Seawright and Gerring, 2008). The "most different" method of case selection involves choosing two or more cases that differ significantly on specified variables—for example, the causal factor of theoretical interest (political corruption) and the outcome (regime legitimacy). This approach is described as the inverse of the "most similar" method (Seawright and Gerring, 2008).

Thus, this research adopts a qualitative comparative method, combining structured, focused comparison with the use of secondary sources—books, journals, media articles, and newspapers. The first and corresponding authors are responsible for gathering materials on Jokowi and the Indonesian case, while the second author is responsible for collecting materials on Xi Jinping and the PRC case.The most different systems design strengthens causal inference by controlling for contextual similarities at the regional and developmental levels. Anti-corruption strategies tend to become more repressive and selective when presidents face high elite fragmentation or weak rule of law.

To address the research problems in this paper, we gathered secondary data from journals, books, magazines, newspapers, and blogs on China and Indonesia, with a focus on political corruption and regime legitimacy, while employing a triangulation method. Several key sources include: (1) Brown (2018), The World According to Xi; (2) Manion (2004), Corruption by Design: Building Clean Government in Mainland China and Hong Kong; (3) Dickson (2016), The Dictator's Dilemma; (4) Lubis (2017), Political Corruption in Indonesia; (5) Fariz (2019), "Jokowi Administration and Political Attacks toward the Corruption Eradication Commission in Indonesia"; and (6) Muhtadi (2015), "Jokowi's First Year: A Weak President Caught between Reform and Oligarchic Politics."

## Discussion

Prior to comparing Xi Jinping's and Jokowi's anti-corruption strategies, it is relevant to briefly review the status and position of each leader within the political environment in which they governed. Comparing the two leaders is a prerequisite for understanding the commonalities and differences between them.

Xi Jinping promised the "Chinese Dream," centralized party and state power in his hands, and launched the Belt and Road Initiative (BRI) along with the Asian Infrastructure Investment Bank (AIIB) as means to achieve that end. On the other hand, Jokowi pledged to deliver on his campaign promises—the Nawacita and Revolusi Mental—with a leadership style focused more on economic development through a New Developmentalism strategy.


Source: Authors elaboration (2025)

We contend that Xi Jinping is less constrained in addressing political challenges due to his concentration of authority—holding three central leadership positions, the removal of presidential term limits, and his designation as the "core" of the Chinese leadership. In contrast, Joko Widodo (Jokowi) faces greater institutional and political limitations, as he must engage in power-sharing, holds only the presidential office without party chairmanship, and is constitutionally restricted to a maximum tenure of ten years.

*The Case of China*

It is important to begin the discussion with Hu Jintao's first address to party leaders in 2012, which included a strong directive to intensify the fight against corruption (May, 2012). The fight is crucial, yet a poor record of success gives little reason for optimism. There are differing views on why this battle has not been won: some argue that it goes hand in hand with the benefits of an otherwise successful system; others attribute it to the legacy of extreme poverty during the Cultural Revolution; and still others believe it to be an inherent part of Chinese culture. Be that as it may, the corrosive effects of corruption on government reforms, the economy, and the reputation of the party are undeniable.

According to May (2012), corruption is skimming away resources allocated for China's urgently needed reforms. While it may not be the country's biggest problem, it seriously hinders efforts to tackle more pressing ones. Consequently, success in curbing corruption is vital not only for China but also for the rest of an increasingly China-dependent world.[6]

China's previous efforts to curb corruption have focused on toughening related penalties, even resorting to capital punishment. But this approach has proved unsuccessful. Rather, transparency and public accountability are more effective in fighting corruption. While China's authoritarian leadership has enabled fast and comprehensive reforms—which turned an impoverished state into a superpower—accountability has little place within authoritarian regimes. This is why reform in China is so difficult.

However, reforms under Xi took a totally different course. Unlike his predecessor, Xi's leadership has been political rather than administrative or economic. Whereas under Hu the country's focus was on GDP growth and achieving new economic results, Xi has worked to consolidate the role of the Party in its national mission to make the country strong and great (Brown, 2018). He has sponsored Party-led nation-building campaigns, promoted the Party line, and enforced ideology and discipline—the last of these as part of the national struggle against corruption (Brown, 2018).

Needless to say, China does not need to become a Western-style democracy; it should find ways to implement public accountability within its own system, allowing for public scrutiny and exposure of corruption where it thrives. Channels that encourage credible and accurate reporting without fear of being labeled "anti-government" must be established. China will need to implement these reforms without forgoing the very characteristics that enabled its economic development. Failure to effectively curb corruption risks widespread public dismay with the country's political leadership.

[6] See link for detail discussion: https://www.eastasiaforum.org/2012/02/09/curbing-corruption-in-china/

The Chinese Communist Party (CCP) under Xi has cast off the shadow of factionalism and become more unified. Signs of dissent have been limited, despite the removal of many powerful figures during the anti-corruption campaign. The campaign has often been described as a power struggle—a description Xi Jinping addressed during his visit to the US in 2015 (Brown, 2018). However, Xi denied any basis for such a claim, stating that the aim was not to accrue personal power but to address political inefficiency within the Party.

The anti-corruption campaign developed into a movement that was as much about symbolism and managing public perceptions as about achieving long-term solutions to cadre misbehavior. High-profile targets like Zhou Yongkang fell from grace—the first time since 1949 that a former member of the Politburo Standing Committee had been investigated and punished in the civil courts. He was soon joined by Ling Jihua, a member of the full Politburo. The notion of felling both "tigers and flies" was important: no one was immune (Brown, 2018).

A milestone for institutional change occurred in 2018. As Deng describes, the structural integrity of the nascent National Supervision Commission (NSC) system rests upon the principle of "One Set of Staff, Two Titles" (合署办公 - hé shǔ bàn gōng). This model dictates that the NSCs are not independent, newly formed entities but are instead integrated into the existing operational framework of the Party's Discipline Inspection Committees (DICs). The critical component of this integration involved the comprehensive absorption of state procuratorial functions related to anti-corruption. Specifically, the investigative arms of the procuratorates—including the Anti-Corruption Bureau and the Anti-Dereliction of Duty Department—were fully transferred to the NSCs. This personnel shift fundamentally embeds the state's judicial anti-corruption personnel into the DIC structure, thereby placing formerly distinct legal enforcement mechanisms under the direct command of the Party organ and solidifying centralized Party control over anti-corruption enforcement.

Combating corruption in an autocracy seems easier than in a democratic country. In China, an explosion of corruption—cases of bribery, embezzlement, and misuse of public funds—occurred after Deng Xiaoping's economic reforms, which opened up the economy starting with four coastal special economic zones. Manion (2004) illustrates the trends in corruption cases investigated in China from 1979 to 2001, distinguishing between all cases and those involving substantial financial sums. The general trajectory shows a significant increase in the number of cases investigated over the period, although the pattern is marked by sharp fluctuations, particularly during the 1980s. Campaign-driven spikes in investigations can be observed, such as the peaks around 1983 and 1987, which reflect the influence of anti-corruption drives rather than steady institutionalized enforcement. When excluding these campaign effects, the trend line indicates a more gradual and consistent rise in corruption cases throughout the two decades.

Notably, cases involving large sums of money—defined until 1998 as amounts above 10,000 yuan, and after 1998 as 50,000 yuan for bribery and 100,000 yuan for embezzlement of public assets—also show a steady upward trajectory, particularly from the early 1990s onward. This pattern suggests both an expansion in the scale of corruption and improvements in institutional capacity to detect and prosecute more complex, high-value cases. The sharp divergence between the trend line of all cases and big-sum cases after the mid-1990s indicates a shift in prosecutorial focus toward more severe forms of corruption, which aligns with broader economic liberalization and the growing stakes of market reforms.

Overall, the data from Manion reveal that while anti-corruption campaigns in the 1980s generated temporary surges in cases, the underlying structural trend was one of rising incidence and/or detection of corruption, particularly involving substantial financial misconduct. This underscores the dual nature of China's anti-corruption efforts: highly visible campaigns on one hand, and gradual institutionalization of enforcement capacity on the other.

In criminal corruption cases investigated in the 1980s and 1990s, embezzlement of public assets accounted for 56 percent, bribery for 28 percent, and misuse of public funds for 16 percent. Senior officials—defined as those at or above the county or division level (xian chu)—comprised a mere 3 percent of officials investigated in the 1990s. Criminal corruption involving big sums comprised one-third of all cases investigated from the late 1980s through the 1990s, although a change in legal definition effective in 1998 significantly reduced the number of such cases. Prior to 1998, "big sums" referred to bribery and embezzlement of public assets involving 10,000 yuan or more and misuse of public funds involving 50,000 yuan or more. These thresholds were raised to 50,000 yuan and 100,000 yuan, respectively (Manion, 2004).

Other important milestones in China's anti-corruption efforts during the Xi era include the creation of the National Security Commission in 2013. The anti-corruption approach has relied heavily on mass campaigns. After Xi Jinping became general secretary, he launched an extensive anti-corruption campaign targeting wasteful spending on official banquets and travel, as well as bribes and gifts. The Central Commission for Discipline Inspection (CCDI) reported confiscating 38.7 billion yuan (approximately $6.2 billion) between November 2012 and June 2015 (Dickson, 2016). Many high-level politicians have been caught and charged with corruption, such as Zhou Yongkang, Ling Jihua, and, in one of the most famous cases, Bo Xilai. Bo's case became a milestone illustrating how censorship in China allows government criticism but silences collective expression, as discussed in the paper by King, Pan, and Roberts (2013).

### *The Case of Indonesia*

It is even more relevant to examine the Indonesian case against this backdrop. Attempts to explain the problems and failings of democratic reform in the post-Soeharto era tend to rely on either the oligarchy thesis, which stresses material power, or the cartelization thesis, which emphasizes political institutions. The oligarchy thesis asserts that, despite the consolidation of democracy since 1998, post-authoritarian government remains controlled by the oligarchic and predatory forces that have defined the country's politics for decades (Hadiz and Robison, 2013).

The cartel thesis, on the other hand, claims that contemporary Indonesian politics is dominated by party cartels, in which a wide spectrum of political parties collude to share the spoils of power (Slater, 2004; Ambardi, 2008). We borrow from Slater (2018) several tables below to illustrate election results from 1999–2014 and power-sharing in cabinets between President Jokowi's supporting parties and their coalitions.

Table 2: General Election result (1999-2019)

| Party | 1999 | 2004 | 2009 | 2014 | 2019 |
|---|---|---|---|---|---|
| PDIP | 33.8 | 18.5 | 14.0 | 18.9 | 19.9 |
| Golkar | 22.5 | 21.6 | 14.5 | 14.7 | 12.1 |
| PKB | 12.6 | 10.6 | 4.9 | 9.0 | 9.7 |
| PPP | 10.7 | 8.2 | 5.3 | 6.5 | 4.5 |
| PAN | 7.1 | 6.4 | 6.0 | 7.6 | 6.7 |
| PK(S) | 1.4 | 7.3 | 7.9 | 6.8 | 8.2 |
| PD | n/a | 7.5 | 20.9 | 10.2 | 7.6 |
| Gerindra | n/a | n/a | 4.5 | 11.8 | 12.5 |
| Hanura | n/a | n/a | 3.8 | 5.3 | 1.6 |
| NasDem | n/a | n/a | n/a | 6.7 | 8.8 |

Source: Dan Slater (2018:6). Election result for 2019, from https://pemilu2019.kpu.go.id/#/dprri/hitung-suara/

Based on Table 2 above, no single party has achieved a majority sufficient to enable one-party rule in Indonesia's historical elections following the collapse of the Suharto regime and the first democratic election in 1999. During the democratic transition, elections in 2004 and 2009 resulted in Susilo Bambang Yudhoyono being elected and serving as president. In 2014, this pattern continued with Joko Widodo (Jokowi) as president, backed by his party, PDI-P. We present power-sharing in the cabinet as follows:

Table 3

Power-Sharing in Jokowi's First "Working Cabinet," 2014–16

| Party | Parliament Seat Share (%) | Coordinating Ministers# | Cabinet Ministers | % of Party Appointments |
|---|---|---|---|---|
| PDIP | 19.5 | 1 [+ President] | 4 | 25.0 |
| Golkar+ | 16.3 | 1 [+ VP] | 2 | 18.8 |
| PAN+ | 8.7 | 0 | 1 | 6.3 |
| PKB | 8.4 | 0 | 4 | 25.0 |
| PPP+ | 7.0 | 0 | 1 | 6.3 |
| NasDem | 6.4 | 0 | 2 | 12.5 |
| Hanura | 2.9 | 1 | 1 | 6.3 |
| Gerindra+ | 13.0 | 0 | 0 | 0 |
| PD | 10.9 | 0 | 0 | 0 |
| PKS+ | 7.1 | 0 | 0 | 0 |

\+ Parties that directly opposed Jokowi in the 2014 presidential election

* Vice President (VP) included in % of Party Appointments count

\# Coordinating Ministers are included in "Cabinet Ministers" count

Brata (2011) identified at least five factors that contributed to the failure to eradicate corruption from the New Order era through the early stages of reformasi. These five causes are closely associated with: (1) policy design factors, (2) political factors, (3) institutional factors, (4) management factors, and (5) societal factors. Among these, flaws in implementation structures and procedures are the principal cause of failure. Brata's analysis also indicated that the political systems of the two regimes—the New Order versus the democratic regime—played a role in the implementation failure of anti-corruption laws.

The president's anti-corruption legal politics are strongly influenced by the practice of presidential power in government (Fariz, 2019). Based on historical accounts, corruption eradication often "fails" because anti-corruption bodies do not dare to enter the epicenter of corruption (Jeremy Pope, 2000, in Fariz, 2019). This condition began to change with the formation of the Corruption Eradication Commission (KPK) in 2003. Various corruption cases involving previously untouchable actors could now be prosecuted. Making friends with the ruling party is no longer a guarantee of immunity from legal processes, as was common during the New Order.

It is no exaggeration, then, that former Chairman of Hong Kong's Independent Commission Against Corruption (ICAC), Tony Kwok (May, 2013), considers the KPK one of the three best anti-corruption institutions in Asia. The handling of cases—in terms of the level of actors involved and the amount of state financial losses—provides indisputable evidence. As a result, the KPK's existence is seen as disrupting the comfort zones of party elites, businessmen, and corrupt law enforcement officials. From the KPK's formation until 2019, at least 107 regional heads were implicated in corruption cases (Indonesia Corruption Watch, 2019, in Fariz, 2019). Not only regional heads but also, during the 2014–2019 period, **at least 23 active members of the Indonesian Parliament were ensnared in corruption cases through sting operations.** These included high-level politicians such as Setya Novanto, Rokhmin Dahuri, Alamin Nasution Hari Sabarno, Andi Mallarangeng, Jero Wacik, Siti Fadilah Supari, Bachtiar Chamsyah, Idrus Marham, and Imam Nawawi. Because Indonesia only began seriously prosecuting corruption cases relatively recently, we lack comprehensive longitudinal data comparable to that presented by Melanie Manion above.

The anti-corruption commitment is at least stated in the second and fourth priorities of Jokowi's Nawacita agenda, that the government **is not absent** in building clean, effective, democratic, and reliable governance by prioritizing efforts to restore public trust in democratic institutions through continued consolidation of democracy, including reforms to the party system, elections, and representative institutions; and realizing transparent governance by consistently advancing bureaucratic reform, improving public service quality, and opening spaces for public participation.

However, we also draw on a conceptual study that analyzes the persistent influence of vested interests in obstructing Indonesia's anti-corruption agenda, even after the democratic transition following 1998. The author contends that, although Indonesia instituted neoliberal institutional reforms—such as democratization, economic liberalization, and the formation of the KPK—these measures failed to dismantle the deeply rooted patronage structures inherited from the New Order regime (Umam, 2021). Rather, established and emerging elites have adapted to the democratic environment by restructuring their networks to safeguard existing political and economic advantages.

The fourth priority involves system reforms and enforcement of rights free from corruption, with dignity and trustworthiness: eradicating the judicial mafia, taking firm action against corruption within the judiciary, and combating illegal logging, illegal fishing, illegal mining, banking crimes, and money laundering. But political reality tells a different story. The parties that supported Jokowi had their own agendas to influence him through cabinet arrangements, as indicated in Tables 3 and 4 above. The corruption eradication program focused only on technical problems in public sector management. Natural resource-related corruption eradication programs remained apolitical, even though corruption is fundamentally a political problem.

## Conclusion

Our article highlights distinct differences between Jokowi and Xi: term limits constrained Jokowi, unlike Xi, who successfully centralized power. Jokowi faced low parliamentary support and thus attempted to build a large coalition for stability. More importantly, the new CCP leadership under Xi announced economic plans that radically challenged the interests of powerful interest groups. This was followed by an anti-corruption campaign that targeted the archetypes of reactionary interest group power—one of the most audacious gambits in the modern history of anti-corruption strategy in China. By confronting all the most powerful groups simultaneously, Xi relied on leadership unity, a technocratic economic strategy, an anti-corruption campaign as his core political weapon, and a wave of popular support.

The legitimacy of the CCP regime is not solely due to combating corruption but is tied to multiple factors, including household income, as discussed in Bruce Dickson's The Dictator's Dilemma. Drawing on Chen Yun's quote, the decision to combat political corruption creates a dilemma: neglecting corruption would ruin China, but punishing it harshly could ruin the Party.

In Indonesia over the past decade, we have witnessed that Jokowi's government often pursued anti-corruption policies at odds with the KPK. President Jokowi showed minimal initiative in developing anti-corruption policies. He prioritized investment and licensing sectors, minimizing corruption issues to petty extortion while the KPK's legal mandate focuses on grand corruption. The corruption eradication ecosystem in Indonesia is strongly influenced by political factors beyond law enforcement itself—including political power dynamics, oligarchic compromises, and the president's sensitivity toward anti-corruption institutions.

Democracy in Indonesia and authoritarianism in China are often taken for granted. Xi operated in a more certain environment for using anti-corruption efforts to enhance legitimacy by tackling high-profile political corruption. In contrast, Jokowi had tremendous institutional support through the KPK but appeared to prioritize economic development over his campaign promises on anti-corruption. With regard to political corruption, both countries have taken significant steps: prosecuting “big players” in Indonesian politics and “tigers” in Chinese politics.

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# Policy Diffusion, Digitalisation, and Governance Gaps in The Implementation of Indonesia's Golden Visa Programme

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*Indonesia's Golden Visa, launched in 2023 through Minister of Law and Human Rights Regulation No. 22/2023, is promoted as a residence-by-investment scheme to attract foreign capital and talent for post-pandemic recovery and digital transformation. This article uses a qualitative descriptive approach based on documentary analysis of regulations, internal guidance, official statistics, and scholarly literature on Golden Visa programmes, investment migration, and digital immigration governance. It examines how Indonesia's scheme is designed and how far its monitoring and governance arrangements are specified. The findings show that Indonesia, as a latecomer, selectively borrows design elements from European models longer residence durations, high investment thresholds, and privileged treatment for targeted investors and global talents—while embedding the programme in a digital-by-design architecture with online application and stay-permit services. However, there is a gap between relatively sophisticated ex-ante design and under-specified ex-post monitoring and evaluation. References to investment realisation, supervision, and revocation lack operational detail on risk-based triggers, inter-agency coordination, and data governance. The article argues that Indonesia's Golden Visa must move beyond investment-promotion rhetoric toward an end-to-end, digitally supported monitoring model and contributes to debates on policy diffusion, investor migration, and digital governance by emphasising institutional capacity and accountability.*

***Keywords:*** *Policy Diffusion, Golden Visa, Investment, Indonesia Immigration, Border Control*

## Introduction

Since its formal launch in 2023 through Minister of Law and Human Rights Regulation No. 22/2023 on Visas and Stay Permits and Minister of Finance Regulation No. 82/2023, Indonesia's Golden Visa policy has been positioned as a strategic instrument to attract high-quality foreign investment and talent for post-pandemic economic recovery. The scheme offers long-term residence permits (5–10 years) to selected categories of foreign investors, global talents, former Indonesian citizens, and world figures, conditional on substantial investment commitments and other strategic contributions to the national economy. International experience shows that residence-by-investment programmes can boost foreign direct investment, tourism receipts, and related economic activities (Patsoulis et al., 2025; Bastian, 2021; Elo, 2021; Surak, 2022), but they also reshape housing markets, urban development, and social stratification in host cities (Gordon et al., 2025; Holleran, 2021; Amante & Rodrigues, 2021; Nadeem & Vora, 2025). At the same time, a growing body of critical scholarship links Golden Visa schemes to tax optimisation, regulatory arbitrage, and reputational risks (Ahrens et al., 2022; Koutsouva, 2020; Lipka, 2020; Shachar, 2021; Gaspar & Ampudia de Haro, 2020), highlighting the possibility that, without robust oversight, such programmes may become gateways for illicit financial flows and money laundering rather than engines of sustainable development (Surak & Tsuzuki, 2021; Corrêa da Silva, 2021).

Previous research on Golden Visa schemes can be clustered into at least three strands. First, a policy-innovation strand understands the Golden Visa as an instrument to attract investment and enhance competitiveness, examining legal design, investment thresholds, and sectoral priorities (Bahri, 2023; Pitrová & Bindačová, 2024; Bastian, 2021; Patsoulis et al., 2025). Second, a comparative macro-economic strand evaluates the origins, uptake, and outcomes of residence-by-investment programmes across jurisdictions, showing how different models balance revenue generation, risk, and distributional effects (Surak, 2022; Surak & Tsuzuki, 2021; Surak & Tsuzuki, 2021: "Are golden visas a golden opportunity?"; Holleran, 2021: "Buying Up the Semi-Periphery"). Third, a risk-and-governance strand foregrounds vulnerabilities related to tax evasion, financial secrecy, and weaknesses in due diligence (Ahrens et al., 2022; Koutsouva, 2020; Lipka, 2020; Anglmayer & Scherrer, 2020). Complementing these macro and regulatory perspectives, micro-level studies document how Golden Visa programmes shape migrants' everyday lives, aspirations, and senses of belonging in Portugal, Spain, Hungary, Greece, and the Gulf (Cojocaru et al., 2025; Beck, 2022; Amante & Rodrigues, 2022; Santos et al., 2023; Beck & Gaspar, 2024; Üret, 2021; Gaspar & Ampudia de Haro, 2020; Nyíri & Beck, 2024; Kostopoulos, 2024; Nadeem & Vora, 2025: "New Cartographies"; Lipka, 2020: "Passport for sale"; Corrêa da Silva, 2021; Shachar, 2021), and how they intersect with broader markets for "safe" or "strategic" mobility.

In addition to the literature on Golden Visa schemes reviewed above, a growing body of work on investor migration programmes in Europe and North America further illuminates the political economy and distributive implications of residence-by-investment policies. Consterdine and Hampshire (2024), using an original immigration policy index for France, Spain, and the United Kingdom, show that investor routes are systematically more open and generous than work routes, including those targeting highly skilled migrants. They argue that the design of investor visas is conditioned by national varieties of capitalism and the political interests underpinning them rather than by purely technical migration-management considerations. Lindeboom and Meunier (2023) similarly situate European investment migration programmes "in the shadow of the Euro crisis", critically reassessing the presumed straightforward link between such schemes, foreign direct investment, and broader developmental gains. Together, these studies suggest that investor visas are deeply embedded in domestic economic models and crisis politics rather than existing solely within neutral policy-design debates.

Research on investor visas in the United States and the United Kingdom adds a complementary critical perspective. Harpaz (2022) interprets global millionaires' demand for U.S. investor visas as a strategy of "keeping one foot on shore", using migration law as a hedge against political and economic uncertainty rather than as a vehicle for productive embeddedness. Analyses of the EB-5 immigrant investor programme (Straut-Eppsteiner, 2021) and the UK Tier 1 (Investor) route (Kamber, 2021) highlight the commodification of migration—the "golden ticket" logic in which residence rights are sold as premium assets—and document tensions between revenue generation, policy integrity, and public perceptions of fairness. At a more theoretical level, Surak (2021) conceptualises "millionaires and mobility" as part of a global market in jus pecuniae, in which access to residence and citizenship is bundled, priced, and intermediated by a transnational industry of lawyers, consultants, and financial actors. Bringing these insights into the Indonesian context underscores that the design, monitoring, and digital governance of Indonesia's Golden Visa cannot be separated from questions of political economy, inequality, and the regulation of private intermediaries who stand to benefit from the scheme.

Parallel to this literature, work on e-government and digital citizenship—including research on "love migrants as digital citizens" and other digitally mediated mobilities (Correction to: Love migrants as digital citizens, 2025)—shows that digital infrastructures, data integration, and cross-border information exchange are increasingly central to migration governance, ex-post policy evaluation, and risk-based monitoring (Anglmayer & Scherrer, 2020; Ahrens et al., 2022). Against this backdrop, Indonesia's Golden Visa must be understood not only as a legal-economic innovation inspired by international policy diffusion (Nyíri & Beck, 2024; Surak, 2022; Surak & Tsuzuki, 2021) but also as a governance challenge that hinges on the credibility of its monitoring, validation, and revocation mechanisms in a rapidly digitalising immigration administration. This leads to the central question of this article: How do the design and governance mechanisms of Indonesia's Golden Visa programme contribute to the effectiveness and risks associated with foreign investment migration in the context of digital governance and policy diffusion?

## Theoretical Framework

Analytically, this article draws on four complementary bodies of theory: policy diffusion, digital governance, risk governance, and globalisation and migration. Taken together, these perspectives enable the Indonesian Golden Visa to be understood not merely as a legal-administrative innovation, but as part of a broader transformation in how states compete for capital, govern cross-border mobility, and manage the risks generated by investment migration schemes.

First, policy diffusion theory is used to explain how Indonesia's Golden Visa emerges within a global field of similar instruments and is shaped by both external models and domestic preferences. Rather than copying European "golden passport" or residence-by-investment schemes wholesale, Indonesia selectively borrows design elements—such as long-term residence rights, differentiated treatment for investors and global talents, and investment thresholds—while translating them into its own legal, fiscal, and institutional context. Concepts from policy diffusion, including emulation, lesson-drawing, and translation, are therefore relevant for understanding why certain features (e.g., emphasis on investment amounts) are readily adopted, whereas others (such as robust ex-post monitoring regimes) remain underdeveloped or only weakly integrated into the regulatory framework.

Second, digital governance and e-government theory provide a lens through which to analyse the programme's "digital-by-design" orientation. The Golden Visa is embedded in Indonesia's broader digital transformation agenda, encompassing online application systems, digital stay permits, and planned integration with immigration and population databases. From a digital governance perspective, these features promise streamlined processes, reduced transaction costs, and greater transparency in decision-making. At the same time, they raise critical questions about interoperability, data quality, algorithmic discretion, cybersecurity, and public institutions' capacity to leverage real-time data for risk-based supervision. Digital governance theory thus helps frame both the programme's ambitions and the implementation gaps that emerge in practice.

Third, risk governance theory is employed to examine how the Golden Visa addresses—or fails to address—the full spectrum of risks associated with investment migration, including money laundering, tax evasion, regulatory arbitrage, and non-compliance with investment commitments. Risk governance emphasises the complete cycle of risk identification, assessment, management, and communication. In the Indonesian case, the legal framework establishes ex-ante conditions, such as minimum investment amounts and broad grounds for revocation. However, mechanisms for ex-post verification of investment realisation, ongoing monitoring of investor conduct, inter-agency data sharing, and proportional enforcement responses remain only partially specified. This gap between regulatory design and operational capacity is central to evaluating whether the Golden Visa can manage risks credibly and accountably.

Finally, globalisation and migration theory situates the Golden Visa within contemporary mobility regimes shaped by global financial networks and the transnational strategies of high-net-worth individuals. Investor migration forms part of a broader pattern in which residence and, in some jurisdictions, citizenship are offered as assets in global portfolios, enabling wealthy individuals to hedge against political, economic, and environmental uncertainty. From this perspective, Indonesia's Golden Visa serves both as a tool of economic diplomacy and as a mechanism that may reproduce or intensify socio-spatial inequalities—for instance, through upward pressure on urban real estate markets or by reinforcing stratified access to mobility. Globalisation and migration theory thus informs the analysis of who benefits from the scheme, how it interacts with existing forms of inequality, and what its longer-term implications might be for the relationship between the state, capital, and different categories of migrants.

## Research Method

This study employs a qualitative descriptive approach based on documentary analysis of legal and regulatory texts, as well as scholarly sources, to provide a contextualised account of how Indonesia's Golden Visa policy is formally designed, structured, and intended to be monitored and evaluated. The analysis centres on the institutional framework of the Directorate General of Immigration within the Ministry of Law and Human Rights (formerly referred to as the Ministry of Immigration and Correctional Affairs), reconstructed primarily from official regulations (e.g., Minister of Law and Human Rights Regulation No. 22/2023 and related instruments), standard operating procedures (SOPs) and internal guidelines (where publicly accessible), official statistics and press releases, and academic and international policy reports on Golden Visa schemes, investment monitoring, and digital immigration governance. Relevant documents were identified through official government portals, legal databases, and scholarly search engines using targeted keywords and then purposively selected based on their direct relevance to Golden Visa regulation, monitoring and revocation mechanisms, and digital governance dimensions.

Data are analysed using qualitative thematic analysis applied to these regulatory and scholarly sources. Text segments are coded according to key dimensions, including policy objectives and design logic, international policy diffusion and learning, monitoring and evaluation mechanisms, investment validation and risk management, and the role of digital systems and inter-institutional coordination. Codes are subsequently grouped into broader themes (e.g., "policy diffusion and design logic", "formal monitoring and revocation framework", "digital governance potentials and gaps") and interpreted through the theoretical lenses of policy diffusion theory, e-government literature, and public policy evaluation frameworks. Trustworthiness is enhanced through triangulation across regulations, SOPs, official statistics, and academic or international reports; maintenance of a transparent audit trail of document selection and coding; and the provision of rich contextual description, enabling readers to assess the transferability of findings to other Golden Visa regimes or digital immigration governance contexts.

## Result

The document analysis confirms that Indonesia's Golden Visa is explicitly framed as an investment-driven migration instrument aligned with the broader post-pandemic economic recovery and digital transformation agenda. Minister of Law and Human Rights Regulation (Permenkumham) No. 22/2023 formally introduces Golden Visa categories for individual and corporate investors, global talents, and certain former Indonesian citizens, coupled with long-term residence permits of five to ten years and an entirely online application process through integrated immigration IT systems. This design mirrors core features identified in comparative work on residence-by-investment schemes: longer residence durations, elevated investment thresholds, and branding around "high-quality" or "strategic" migrants (Surak, 2022; Surak & Tsuzuki, 2021; Elo, 2021; Bastian, 2021). At the same time, the regulation embeds the Golden Visa within a restructured visa and stay-permit regime and links it to broader reforms under Government Regulation (PP) No. 40/2023 on the implementation of the Immigration Law, indicating that the Golden Visa is not a stand-alone programme but part of a systemic reconfiguration of immigration control and investment facilitation.

When read against the international literature, Indonesia's model emerges as a latecomer that selectively borrows and adapts design elements from European and other schemes. Macro-comparative studies show that Golden Visa programmes are often justified by promises of FDI inflows, tourism receipts, and urban revitalisation (Patsoulis et al., 2025; Surak & Tsuzuki, 2021; Holleran, 2021). Indonesian policymakers similarly invoke investment promotion and competitiveness, yet the regulatory texts also emphasise digital service delivery, online processing, and the transition to digital stay permits—dimensions that were less central in earlier European cases (Bahri, 2023; Surak, 2022). In terms of policy diffusion, this supports the argument that policies do not travel unchanged: they are translated through local agendas—in this case, the digitalisation of immigration services and the government's wider e-government strategy (Nyíri & Beck, 2024; Corrêa da Silva, 2021; Ahrens et al., 2022).

The regulatory texts reviewed indicate that Indonesia's Golden Visa is formally tied to investment commitments, immigration guarantees (jaminan keimigrasian), and the possibility of revocation when conditions are not met. Permenkumham No. 22/2023 sets out categories and basic requirements, while subsequent circulars—such as the Director General of Immigration's circular on the implementation of stay permits after the enactment of the new regulation—clarify transitional arrangements, including how pre-existing investor stay permits are handled and how new applications must be processed through updated systems. This creates a dual regime in the short term (old versus new investor pathways), with implications for consistency in monitoring and evaluation.

A key finding of the documentary analysis, however, is that although regulations frequently refer to "investment realisation", "evaluation", and "supervision" (pengawasan), they provide limited operational detail on how these functions are to be carried out over the lifetime of a Golden Visa. The provisions focus primarily on entry conditions and eligibility (e.g., size and form of investment, types of investors, guarantee mechanisms) but are far less specific about ongoing verification of capital maintenance, business performance, or risk indicators once the residence permit has been granted. This echoes concerns in the international literature that residence-by-investment regimes often specify rigorous ex-ante due diligence and capital thresholds while under-developing ex-post monitoring of whether promised investments materialise and are sustained (Surak & Tsuzuki, 2021; Ahrens et al., 2022; Gaspar & Ampudia de Haro, 2020).

Moreover, the Indonesian framework allocates broad responsibilities for guidance, supervision, and evaluation to immigration authorities and related agencies, but without a fully articulated division of labour or reporting architecture across immigration, investment, financial-intelligence, and tax authorities. European experience suggests that, in the absence of clear inter-agency arrangements and shared data infrastructures, Golden Visa schemes are particularly vulnerable to regulatory arbitrage, tax avoidance, and reputational damage (Ahrens et al., 2022; Koutsouva, 2020; Lipka, 2020; Shachar, 2021). Indonesia's regulations recognise these risks in general terms by allowing revocation in cases of non-compliance or threats to public order and security, yet they stop short of defining risk-based triggers, review timelines, or mandatory reporting obligations that would operationalise a true "lifecycle" monitoring model.

A central result of the analysis is the prominence of digitalisation in Indonesia's Golden Visa architecture. Regulatory and policy documents emphasise that Golden Visa applications, approvals, and issuance of stay permits and entry visas (IMK) are processed entirely online, with outcomes delivered electronically, and that stay-permit services are being migrated from legacy applications to newer systems (e.g., Molina and SIMKIM V2). Circular guidance on the implementation of stay-permit services after Permenkumham No. 22/2023 further instructs immigration offices to handle applications via designated digital platforms during the transition period, align documentation requirements with new rules on investment and share values, and report evaluation results regularly to the Directorate General of Immigration.

From an e-government and digital governance perspective, this "digital-by-design" approach could potentially address several weaknesses documented in other Golden Visa regimes. Studies on digital immigration governance and digital citizenship underline how integrated information systems, digital identities, and cross-border data exchange can enhance data accuracy, reduce processing times, and support risk-based decision-making (Anglmayer & Scherrer, 2020; Ahrens et al., 2022; Correction to: Love migrants as digital citizens, 2025). If effectively implemented, Indonesia's online systems for application, documentation, and reporting could, in principle, enable continuous monitoring of investors' status, automatic alerts for non-compliance (e.g., failure to maintain investments), and more systematic evaluation of programme outcomes.

Yet the same documents reveal significant implementation challenges. The need for transitional circulars indicates that IT systems and business processes have had to be retrofitted to accommodate the new regime, with parallel handling of older investor stay permits and new Golden Visa categories for at least part of the transition period. This risks the very fragmentation and inconsistency that e-government reforms are intended to eliminate and may create temporary blind spots in monitoring—for instance, where investor data are dispersed across old and new systems or where field offices interpret transitional rules differently. Comparative research on Golden Visa programmes suggests that such institutional and infrastructural frictions can undermine the effectiveness of due diligence and monitoring, even where regulations formally require high standards (Surak, 2022; Amante & Rodrigues, 2021; Holleran, 2021). In short, digitalisation is necessary but not sufficient for robust oversight; it must be accompanied by clear data-governance rules, full interoperability across agencies, and adequate human capacity at the front line.

Finally, interpreted through globalisation and migration theory, the Golden Visa programme positions Indonesia within an increasingly crowded global market for investor migrants. By offering long-term residence to investors and selected global talents, the country seeks to attract capital, technology, and networks that can support domestic development agendas. At the same time, the benefits and burdens of such a strategy are unevenly distributed. While potential gains accrue to specific sectors and territories, the programme risks predominantly serving the interests of mobile elites, with limited spill-over to broader societal welfare. This underscores the need to complement narrow investment metrics with a more holistic assessment of public value, including impacts on inequality, territorial development, and the perceived fairness of the migration regime.

In terms of risk governance, the analysis reveals that Indonesia's Golden Visa is stronger on articulating formal conditions than on operationalising continuous oversight. The law and implementing regulations enumerate obligations and grounds for revocation, but procedures for verifying investment realisation, coordinating with financial-intelligence and tax authorities, and applying graduated administrative responses remain underdeveloped. Risk is thus framed primarily as a legal-regulatory issue at the point of entry rather than as an ongoing object of systematic assessment and management. This imbalance exposes the state to reputational and fiscal risks, especially if investments are not realised as promised or if the scheme is exploited for illicit purposes.

Viewed through digital governance and e-government theory, the findings show a clear ambition to embed the Golden Visa within a wider digital immigration ecosystem, including online submission, electronic stay permits, and links to national databases. Digital tools reduce reliance on paper, create audit trails, and could, in principle, support risk-based screening and monitoring. Yet the implementation record points to fragmentation between systems, uneven connectivity across frontline offices, and limited use of data analytics to inform supervision and enforcement. In this sense, digitalisation operates more as a symbolic marker of modernity than as a fully realised governance capability, highlighting the familiar gap between front-end service innovation and back-end institutional reform.

From a policy diffusion perspective, the Indonesian Golden Visa programme illustrates how global models are selectively appropriated rather than mechanically replicated. The programme borrows the basic logic of residence-by-investment—longer stay rights in exchange for substantial financial commitments—while adjusting legal form, sectoral priorities, and administrative arrangements to domestic objectives. However, certain core design choices, such as the strong emphasis on ex-ante investment thresholds and the relatively thin specification of ex-post monitoring obligations, also mirror weaknesses found in earlier European schemes. This pattern suggests that diffusion may transmit not only best practices but also design vulnerabilities, particularly when domestic political pressures privilege rapid signalling of competitiveness over the slower work of building robust supervisory capacities.

## Discussion

Taken together, these findings suggest that Indonesia's Golden Visa sits at the intersection of two competing dynamics highlighted in the literature: the pursuit of investment and competitiveness on the one hand, and the need for credible risk management and public accountability on the other (Patsoulis et al., 2025; Elo, 2021; Corrêa da Silva, 2021; Surak & Tsuzuki, 2021). On the investment side, the Indonesian framework adopts the familiar toolkit of long-term residence permits, elevated thresholds, and privileged treatment for targeted categories of investors and talents—in line with policy-innovation perspectives that view the Golden Visa as a lever for FDI, tourism, and place-branding (Bahri, 2023; Bastian, 2021; Pitrová & Bindačová, 2024). On the risk side, it formally recognises the possibility of non-compliance, illicit financial flows, and security threats, and embeds revocation powers accordingly—yet without fully articulating an end-to-end monitoring and validation model that would align with the more critical risk-governance strand of the literature (Ahrens et al., 2022; Gaspar & Ampudia de Haro, 2020; Lipka, 2020).

From a public-policy-evaluation perspective, this means that Indonesia's Golden Visa is currently stronger on ex-ante design (eligibility criteria, investment thresholds, and digital application processes) than on ex-post evaluation (systematic verification of realised investment, impact assessment, and attention to equity and distributional effects). Ex-post evaluation frameworks in the EU context emphasise integrating monitoring and evaluation throughout the entire policy cycle, with explicit criteria of relevance, effectiveness, efficiency, impact, and sustainability (Anglmayer & Scherrer, 2020). Applying this lens to Indonesia points to several priorities for further development:

(1) specifying measurable indicators for investment realisation, sectoral contributions, and job creation; (2) formalising risk-based review schedules and reporting obligations across immigration, investment, and financial-intelligence agencies; and (3) leveraging digital systems not only for processing applications but also for real-time analytics, cross-checking with tax and financial data, and public reporting of aggregate outcomes.

Finally, the Indonesian case reinforces the insight from policy diffusion theory that policy borrowing is never neutral (Nyíri & Beck, 2024; Surak, 2022). Emerging evidence from Portugal, Spain, Greece, and Hungary shows that Golden Visa schemes can reshape urban space, housing markets, and class relations in unexpected ways, while also fuelling political debates about who counts as a desirable migrant (Gordon et al., 2025; Holleran, 2021; Üret, 2021; Cojocaru et al., 2025; Santos et al., 2023; Kostopoulos, 2024). By foregrounding digitalisation and formal revocation powers, Indonesia signals an intention to learn from these experiences. Whether this intention ultimately translates into genuine public value—defined not merely as higher investment inflows but as socially legitimate, transparent, and risk-sensitive governance—will depend on how the still-nascent monitoring and digital-governance components are specified, resourced, implemented, and periodically evaluated in practice.

## Conclusion

This study has shown that Indonesia's Golden Visa is best understood as both a latecomer to, and a distinctive variant of, the global wave of residence-by-investment schemes. Formally launched through Minister of Law and Human Rights Regulation (Permenkumham) No. 22/2023 and aligned with Government Regulation (PP) No. 40/2023, the policy adopts the familiar toolkit of long-term residence permits, high investment thresholds, and preferential treatment for targeted investors and global talents in order to support post-pandemic economic recovery and enhance national competitiveness. At the same time, the Indonesian model is strongly shaped by the government's digital transformation agenda: applications, approvals, and stay-permit services are designed to be processed entirely online through integrated immigration IT systems, signalling an attempt to embed the Golden Visa within a broader shift toward e-government and digital immigration governance.

Documentary analysis, however, reveals that this sophisticated ex-ante design is not yet matched by equally robust ex-post monitoring and evaluation mechanisms. Although regulations repeatedly refer to investment realisation, evaluation, and supervision, they provide limited operational detail on how these functions should be carried out throughout the life cycle of a Golden Visa permit—how investments are to be verified over time, how risk indicators should trigger review or revocation, and how responsibilities and data flows are to be structured across immigration, investment, financial-intelligence, and tax authorities. The result is a framework that formally recognises the risks highlighted in international research—regulatory arbitrage, illicit financial flows, and reputational damage—yet does not fully operationalise a risk-based, end-to-end monitoring model.

From a governance and public-value perspective, Indonesia's Golden Visa currently appears stronger in its legal-economic innovation and "digital-by-design" architecture than in its mechanisms for ensuring accountability, equity, and long-term sustainability. Strengthening the policy therefore requires moving beyond the promise of increased investment inflows to the hard work of:

- Specifying measurable indicators of investment realisation and sectoral contribution;
- Designing clear, risk-based review schedules and reporting obligations across relevant agencies; and

- Using digital systems not only as processing tools but also as platforms for real-time analytics, cross-checking with financial and tax data, and transparent public reporting.

Finally, the Indonesian case underscores a central insight from policy diffusion theory: policy borrowing is never neutral. By adopting a Golden Visa in a context marked by rapid digitalisation and heightened sensitivity to money-laundering and tax-avoidance risks, Indonesia has the opportunity to learn from the limitations of earlier schemes in Europe and elsewhere and to craft a model that balances competitiveness with credible oversight. Whether the Golden Visa ultimately generates public value—as a socially legitimate, transparent, and risk-sensitive instrument of migration and investment policy—will depend on how these still-nascent monitoring and digital-governance components are specified, resourced, implemented, and periodically evaluated in practice. Future empirical research, including fieldwork within immigration and partner agencies as well as analyses of programme outcomes, will be essential to determine whether this potential is realised.

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