

THREE MODELS OF POWER IN GLOBAL AI GOVERNANCE

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Abstract *International AI governance is often described as fragmented, with no binding treaty and only a patchwork of soft-law rules. I think this is only part of the picture. While fragmentation exists, it actually covers up three competing strategies of power. The European Union relies on regulatory export, using its AI Act and the market influence called the "Brussels Effect." The United States has changed course in recent years and now uses a technology-stack approach, sending hardware, software, and data infrastructure abroad through the 2025 American AI Exports Program before finishing its own domestic policy. China combines bilateral infrastructure investment with UN-led capacity building and a strong focus on AI literacy at home, making its international offering more credible. There is also a fourth force: a group of top scientists and civil society leaders pushing for a binding treaty to limit all three state strategies, known as the 2025 Global Call for AI Red Lines. Existing theories of normative power, which focus on single actors, do not explain this kind of multi-directional competition. I present a framework that does so, and I examine what this means for the legal power of developing states.*

Keywords *artificial intelligence governance; normative power; regulatory competition; digital sovereignty*

1. Introduction

The governance of artificial intelligence is usually described as fragmented. Scholars note the lack of a binding international treaty and the mix of soft law and domestic statutes that has filled the gap, seeing this as an unfinished convergence process — a settlement still waiting to happen. I think the diagnosis is only half right. Fragmentation is real. What it conceals is a fight. Beneath it hides three distinct and competing strategies of power, led by the European Union, the United States, and China. Each one is based on a different idea of how influence moves between countries and affects others in different ways.

The European Union pursues regulatory export: it projects a binding legal template, the AI Act, whose extraterritorial reach makes compliance the price of market access, in the pattern long identified as the "Brussels Effect" (Bradford 2020). Washington has tried various approaches. Between 2022 and 2025, the American approach swung from a rights-based blueprint to outright deregulation, and has settled, under the current



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administration, on a technology-stack strategy: the 2025 American AI Exports Program embeds hardware, software, and data infrastructure abroad before any domestic legal framework is finalized. China combines bilateral infrastructure investment with capacity-building diplomacy through the United Nations, an approach that draws credibility from a domestic build-out of AI literacy and technical education, as discussed in Section 4.

None of this is merely academic. The global AI market is projected to grow from roughly \$260 billion in 2025 to more than \$1.2 trillion by 2030 (Statista 2025). Kissinger, Schmidt, and Mundie (2024) go further, arguing that national strength itself is shifting from human capital to computing capital. Take that seriously, even provisionally, and the question of

whose governance model prevails in the developing world stops being a matter of regulatory taste. It becomes a question about the future shape of power.

The closest existing analysis is Bradford's *Digital Empires* (2023), and I want to clearly acknowledge her influence. She identifies the same three powers, and her final chapters focus on each one's external ambitions: the declining influence of the American model, China's use of infrastructure to spread its approach, and Europe's effort to make its rights framework global through regulation (see also Roberts et al. 2023). My approach differs in three ways. *Digital Empires* looks at the nature of each power and their rivalries; I focus on the recipient, examining what this competition looks like for a developing state facing all three options at once. The mechanisms I discuss also came after her book: the AI Exports Program, China's open-source strategy, and the Global Call for AI Red Lines did not exist when she wrote, and do not fit her categories. The two main theories I use—normative power theory (Manners 2002) and transnational legal ordering (Halliday and Shaffer 2015)—were designed to explain the influence of a single actor or the spread of a single norm. They were not made for a situation with three state strategies and a fourth, non-state force, all acting on the same country at once. Sections 2 to 4 look at the European, American, and Chinese strategies. Section 5 covers the Red Lines initiative. Section 6 considers what all this means for the legal power of developing states.

2. The European Model: Regulatory Export

Nothing about the European Union's approach to AI is, in one sense, new. Bradford's account of the Brussels Effect — EU regulation becomes a *de facto* global standard because multinational firms find it cheaper to comply with Brussels everywhere than to run two product lines — was built for data protection, but it fits the AI Act just as well (Bradford 2020). The Act sorts AI applications into prohibited, high-risk, limited-risk, and minimal-risk tiers with obligations that escalate accordingly, and it was drafted on the assumption that firms serving the European market would rather build one compliant product than two (Veale and Zuiderveen Borgesius 2021).

Whether this holds for AI specifically is an open question, and serious people disagree about it. Siegmann and Anderljung (2022) extend Bradford's framework and find both effects likely—a *de facto* one in product design and a *de jure* one in legislative imitation. Crum (2025) is unconvinced: he reads the Act's own procedural, open-ended drafting as closer to experimentalist governance than to a fixed export template, which would mean less diffusion abroad than the GDPR achieved, not more.

What sets regulatory export apart from the other two strategies is the source of its leverage. Brussels does not need to negotiate with a developing state; it only needs companies selling into its market to find it cheaper to comply than to do things differently. This makes the effect quietly coercive. A state might add AI Act-style risk tiers to its own laws for reasons unrelated to Brussels, simply because its companies already follow these rules to do business in Europe. The language that comes with these tiers is not neutral. It assumes there are independent regulators, a private sector capable of producing technical documents, and courts ready to handle algorithmic harm claims. None of this is officially required, but in practice, these conditions must be in place for the template to work as intended.

3. The American Model: The Technology Stack

If the European strategy exports a template, the American one, for most of the past three years, could not settle on what it was exporting. In October 2022, the Biden White House released the Blueprint for an AI Bill of Rights, a rights-oriented document built around five principles—safe and effective systems, protection from algorithmic discrimination, data privacy, notice and

explanation, human fallback—that read closer in spirit to the EU’s approach than to anything that followed (OSTP 2022). It was explicitly non-binding; OSTP stated as much in its legal disclaimer. Within three years, the posture reversed entirely. On 23 July 2025, the Trump White House released *Winning the Race: America’s AI Action Plan*, a ninety-point strategy organized around three pillars—accelerating innovation, building domestic infrastructure, leading international AI diplomacy—alongside three implementing executive orders (White House 2025). Rights language was now largely absent. The third pillar was operationalized through Executive Order 14320, *Promoting the Export of the American AI Technology Stack*, which directs the Department of Commerce to promote full-stack American AI packages—hardware, software, models, data infrastructure—to partner states, explicitly to advance American leadership and reduce partner reliance on strategic competitors’ technology. The Program does not negotiate regulatory harmonization. It solicits industry consortia to build export packages, handing dependency construction to firms operating with government’s encouragement. Commerce Secretary Howard Lutnick said the quiet part aloud when he defended continued chip sales to Chinese firms on the grounds that their developers should stay ‘addicted to the American technology stack’ (cited in Harwit 2025).

That external strategy rests on a domestic rebuilding effort of comparable scale. The 2022 CHIPS and Science Act authorized \$280 billion in total spending; only \$52.7 billion was earmarked for semiconductor manufacturing incentives. By early 2026, the Commerce Department had awarded roughly \$7.9 billion to Intel, \$6.6 billion to TSMC, \$6.4 billion to Samsung, and \$6.1 billion to Micron for fabrication plants in Arizona, Ohio, and New York (AIP.org 2024; Stimson Center 2025). Put simply, the stack the Exports Program sells abroad is the one this onshoring effort is building at home.

The main theoretical issue is the type of power each approach uses. Regulatory export relies on market exclusion: comply or lose access. Technology-stack promotion uses a quieter method, called *infrastructural lock-in*. Once a country’s AI systems and data centers are built on a certain stack, switching to other technical standards later, even if they are better, becomes very costly. In this case, dependency comes first, and alignment follows. Theories of normative influence, which focus on arguments and market incentives, do not cover this. This kind of power shapes

the situation before a country has chosen its own AI approach, by quietly making some regulatory choices cheaper and others more expensive.

4. The Chinese Model: Capacity-Building Diplomacy

China's strategy borrows from both of the preceding models but answers to a different logic entirely. Like the United States, it has financed data centers, 5G infrastructure, and AI research partnerships across the developing world — underwritten by a state-directed industrial policy that put some \$142 billion into semiconductor development between 2014 and 2023, 3.6 times the comparable American figure over the same period (Kennedy 2026). That state spending kept climbing even as private AI investment in China fell 44 percent in 2023, while the United States saw a 22 percent rise that same year (Stanford HAI 2024). The two countries are no longer just pursuing different models; increasingly, they are funded

differently — one by the state, the other still mostly by the market. Even China's headline advantage needs qualifying. It has led the world in AI patent grants since 2013, holding over half the global total to America's roughly 20 percent, but its patents cluster in universities and state-linked entities around computer vision, while the smaller, more concentrated American output — Google, Microsoft, IBM — spans a wider range of fields (Stanford HAI/CSET 2026). Patent counts measure activity. They do not measure capability, and these two are easy to confuse. Unlike the American strategy, China's outward engagement runs mostly through multilateral channels and is framed around sovereignty and capacity rather than technological superiority: it co-led, with more than 140 co-sponsoring states, a 2024 UN resolution on AI capacity-building that treats the central problem of global AI governance as unequal access to resources and expertise, not risk.

China's industrial base has given it another tool: open-source distribution. Chinese labs like DeepSeek, Alibaba's Qwen, and MiniMax now release top models under open licenses. Two years ago, this part of the market was almost nonexistent; by mid-2026, it made up about one in three large language model deployments worldwide (Fortune 2026). The American approach creates dependency, but the Chinese approach allows easy access. Any developing country can use, review, and change an open Chinese model at very low cost. This is influence based on the spread of

technology, not on creating dependency, and Western labs that use closed models have struggled to compete.

Here the capacity-building story runs into a contradiction. At home, the Cyberspace Administration of China has built one of the world's most centralised AI governance regimes: the Provisions on Algorithm Recommendation (effective March 2022), the Provisions on Deep Synthesis (effective January 2023), and the Interim Measures for the Management of Generative AI Services (effective August 2023) — China's first binding generative AI law, and among the first anywhere — each issued jointly by the CAC with several other ministries, each requiring licensing, security assessment, or content review before anything reaches the public (Sheehan 2023; Library of Congress 2023; White & Case 2025). Abroad, China presents itself as a partner in inclusive, sovereignty-respecting capacity building. At home, it runs a licensing and content-control apparatus considerably more centralized than the EU's own rights-based classification. I do not think this contradiction is accidental, nor do I think the comparative literature, which tends to read each power's domestic model as the expression of a stable political culture, has much to say about why it persists (Wang 2026).

This imbalance also appears in human capital. In April 2026, five central government departments launched an AI + Education Action Plan that covers all levels of schooling and lifelong learning. AI became a required course in higher education, and a national literacy standard was set for teacher certification (China Daily 2026). In Beijing, every student must take 8 hours of AI classes each year, and by 2025, 87.7 percent of schools had adopted this requirement. If we look past the different terms, the same pattern appears: resources that a recipient country lacks—such as investment, training, computing power, usable models, and now a literacy plan—are offered in return for alignment and continued access to the market.

5. A Complicating Vector: The Push for Binding Global Red Lines

So far, all the strategies discussed are led by major powers. Each of the three models tries to draw a recipient country into its sphere of influence. There is also a fourth force that does not follow this pattern, since it is not led by any state. Instead, it is a global group of scientists, civil society organizations, and former political

leaders who want to limit all three great-power projects simultaneously.

On 22 September 2025, at the opening of the 80th UN General Assembly high-level week, Nobel Peace Prize laureate Maria Ressa announced the Global Call for AI Red Lines. The letter, organized by the French Center for AI Safety, The Future Society, and the Center for Human-Compatible AI at Berkeley, was signed by more than 200 prominent figures, including 10 Nobel laureates, the researchers Geoffrey Hinton and Yoshua Bengio, and OpenAI co-founder Wojciech Zaremba. Notably, Sam Altman and Demis Hassabis did not sign. It calls for an international agreement by the end of 2026 prohibiting specific applications — weaponization, autonomous, mass-scale cyberattacks, self-replicating systems without human oversight — to be enforced by an independent body with real verification powers, closer to arms control than to the voluntary Seoul Commitments of 2024 (Global Call for AI Red Lines 2025).

No matter what happens, the Call adds a new layer of complexity to the discussion. It does not compete with the European, American, or Chinese models for influence over recipient countries. Instead, it tries to set minimum standards for all three, seeing the whole competition as a risk rather than just a challenge to manage. If a binding treaty is created, it would not settle which offer is best. Instead, it would limit the choices available, turning today's debate about which norms should win into a narrower discussion about following a shared rule. I am not sure if the political will exists to meet the 2026 deadline.

6. Multi-Vector Competition and Its Implications

None of the three state-led approaches—market-based export, infrastructural lock-in, or resource-based capacity-building—works alone anymore. Now, a fourth, non-state force also challenges all three. More and more developing countries face all four at the same time, in the same regulatory space. This is what I call multi-vector competition. Existing theories were not designed for this. Manners's idea of normative power assumes only a single actor's influence (Manners 2002), and most research on transnational legal ordering examines the spread of a single set of norms rather than several competing and mutually limiting ones within the same legal system (Halliday and Shaffer 2015).

In this situation, a recipient country no longer just decides how much of one set of norms to adopt. Instead, it must choose which mix of norms, technology partnerships, and diplomatic ties works best, knowing that picking one part can quietly block access to another. For example, building AI systems on the American stack makes it harder to comply with EU data-localization rules because the technical setup differs. Working with China on capacity-building also makes later talks with the EU more difficult, since it is based on a different idea of sovereignty. In this context, legal agency is not just about saying no. It is about the more complex task of managing competing offers so that today's decisions do not limit future options. A skill that requires regulatory knowledge and coordination across government, which many developing countries are still learning to master.

7. Conclusion

I have argued that AI governance, usually described as fragmented, is better read as contested: three distinct strategies of power operating at once, not one project slowly converging. Regulatory export runs on market pressure. The technology stack runs on infrastructural lock-in. Capacity-building diplomacy runs on scarce resources — reinforced, in China's case, by a literacy model few competitors can currently match — offered in exchange for alignment. None of the three has stayed still even in the time it took to write

this: the American posture alone shifted from a rights blueprint to outright deregulation in just three years. If computing capital is really displacing human capital as the primary measure of national strength, as Kissinger, Schmidt, and Mundie (2024) argue, then which model prevails in any given developing state is a question about the future shape of power, full stop. Understanding the separate logics at work in that competition is the first step toward knowing whether and how developing states might turn competitive attention into actual leverage — a question I take up in detail for the case of Uzbekistan in a companion article.

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