

AI Governance at a Cross-Roads in ASEAN and BRICS: A Road Toward Inclusivity Amid Techno-Nationalism

Final Report

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12th May 2026

Acknowledgements

We would like to first express our sincere gratitude to Professor Jérôme Duberry for serving as our Applied Research Project (ARP) Faculty Lead at the Geneva Graduate Institute. His continued support and encouragement at key stages of the project played an important role in shaping the direction of our research and strengthening our confidence in our analysis as junior researchers.

We are also deeply grateful to Professor Roxana Radu, and by extension the Blavatnik School of Government at the University of Oxford, for her engagement with our work throughout the development as our external partner. As a leading scholar in digital governance, her recommendations on relevant literature and the broader debates within the field greatly strengthened our research.

In addition, we would like to thank all interview participants who generously shared their time and perspectives with us. This includes both those who chose to be identified and those who preferred to remain anonymous. Their contributions to this study were essential to complete our research project.

Finally, we also thank the ARP coordinators for bringing us together in the first place as well as the Geneva Graduate Institute as a whole for providing the thriving academic environment in which the project was conducted.

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INTRODUCTION

The rise of Artificial Intelligence (AI) is rapidly advancing within the context of radical technological transformation, and is proving to be a significant agent of influence in scientific innovation, national and transnational economics, and societal change.¹ Since the conceptualization of machine intelligence in the 1950s, AI has evolved into a large-scale machine learning system, accessible to the broader public. Still, stark disparities in AI readiness and governance across the world have been revealed, as the capacity to regulate and deploy AI technologies remains unevenly distributed.² These disparities are entrenched by the accelerating rise of techno-nationalism due to a broader de-globalization movement that shifts a state's priorities inwards, becoming less engaged internationally. Hence, states increasingly link technological capability to national power and overall geopolitical security. Governments that adopt techno-nationalist strategies seek to strengthen domestic AI capacity by shaping governance frameworks that protect strategic industries and advance national interests, while also positioning themselves to influence emerging global norms.³ The variation is evident among global powers and also within regional groupings such as ASEAN and BRICS, where member states are navigating the balance between national priorities, collective regional objectives, and the pressures of global techno-nationalism.⁴

Background and Context

After two decades of globalization, which embraced interdependence as a stabilizing force, the current trend reverses this logic, with economic and technological interdependencies increasingly framed as strategic vulnerabilities that should be reduced.⁵ While so-called 'advanced' economies are known to implement formal regulatory frameworks, others are known to more frequently adopt adaptive, hybrid strategies that aim to balance innovative incentives with ethical and societal considerations.⁶

¹ Batool et. al., "AI Governance: A Systematic Literature Review," 1.

² Gonzales as cited by Putra, "Governing AI in Southeast Asia," 2ff.

³ Bitzinger, "Technonationalism and Emerging Technologies in Smaller States," 2ff.

⁴ Putra, "Governing AI in Southeast Asia," 2ff.

⁵ Dafoe, "AI Governance: Research Agenda," 41-47.

⁶ Gonzales as cited by Putra, "Governing AI in Southeast Asia," 2.

The OECD Principles on AI were adopted in May 2019, making them one of the first and very influential intergovernmental standards for AI governance.⁷ They precede many national and regional legislative efforts within Europe to prioritize ethical AI standards⁸, notably serving as the basis of the G20 AI Principles endorsed in 2019.⁹ The EU’s AI Act (Regulation 1689), which entered into force in 2024, is one of the formal regulatory efforts that adopts a risk-based framework to classify and regulate AI systems and acts as “the frontier for a regional legal framework on AI in the past decade.”¹⁰ Conversely, the US relies on more sectoral regulation and voluntary industry standards, essentially fostering market-driven innovation.¹¹ China, on the other hand, employs a top-down, state-centric approach that integrates AI systems into its social and security apparatus.¹² Regionally, both ASEAN and BRICS have declared their intention to balance technological advancement with the imperatives of equity and national autonomy in their respective groupings. Despite these regional commitments, alignment is not always guaranteed, considering the tension between national interest and consensus-driven goals.¹³ The divergence occurs as commitments within organizations like BRICS and ASEAN fall under the category of non-binding soft law, allowing national sovereignty and domestic priorities to dictate the pace and form of national AI policymaking.¹⁴

Overall Objectives

This research project shifts the focus to regions outside commonly studied actors such as the United States of America (US), the People’s Republic of China (PRC), and the European Union (EU).¹⁵ In particular, it examines selected BRICS and ASEAN member states that represent diverse socio-political landscapes.¹⁶ The literature suggests these approaches to AI governance often follow a ‘Third Way’ rather

⁷ OECD, “AI Principles.”

⁸ Batool et. al., “AI Governance: A Systematic Literature Review,” 3271.

⁹ OECD.AI and GPAI, “G20 AI Principles: G20 Ministerial Statement on Trade and Digital Economy.”

¹⁰ EU Parliament and Commission, *Regulation (EU) 2024/1689 (Artificial Intelligence Act)*; Almada and Radu as cited by “Governing AI in Southeast Asia,” 2.

¹¹ Ishkhanyan, “The Sovereignty-Internationalism Paradox in AI Governance,” 7.

¹² Belli, “BRICS Countries and AI Sovereignty,” 6.

¹³ Belli, “BRICS Countries and AI Sovereignty: An Emerging Multilateral Approach?.”; Putra, “Governing AI in Southeast Asia.”

¹⁴ Walter, “Global Policy and Governance in Artificial Intelligence Regulation.”

¹⁵ Belli, “BRICS Countries and AI Sovereignty: Introduction to Thematic Section,” 11.

¹⁶ Putra, “Governing AI in Southeast Asia,” 2.

than Western or Sino-centric pathways, purportedly offering alternative models that balance liberal frameworks with state-controlled, techno-nationalist approaches in favour of greater self-determination¹⁷. They remain underexplored despite their growing relevance. To address this gap, this inquiry poses the following research question: *How are nascent AI national policies within ASEAN and BRICS shaping AI governance within the context of rising techno-nationalism?*

LITERATURE REVIEW

Evolution of The Field of AI Governance

Artificial intelligence governance emerged within Western discourse largely as an ethical and legal issue, framed around safeguarding transparency and accountability.¹⁸ Early scholarship concentrated on regulating algorithmic processes and risk within established decision-making models, rather than examining AI as a political or strategic instrument.¹⁹ Initially, AI was understood in socio-technical terms, with attention focussed on procedural safeguards over structural power dynamics.²⁰

By the mid-2010s, the literature began linking AI to national strategies and economic competitiveness.²¹ This reflected a longer trajectory whereby technological capability functions as a political asset, echoing Robert Reich's early articulation of techno-nationalism.²² Nakayama (2012) similarly traced AI governance to historical notions of technology-driven nation-building, while Montresor (2001) highlighted persistent tensions between technological autonomy and dependency in global infrastructure systems.²³ This shift reframed AI as a strategic instrument for state competitiveness and digital sovereignty.²⁴

¹⁷ Putra, "Governing AI in Southeast Asia," 3ff.

¹⁸ Cath, "Governing Artificial Intelligence: Ethical, Legal and Technical Opportunities and Challenges," 3f.

¹⁹ Veale et al. "AI and Global Governance: Modalities, Rationales, Tensions," 256.

²⁰ Raymond and Denardis, "Multistakeholderism: Anatomy of an Inchoate Global Institution," 24.

²¹ Tallberg et al., "The Global Governance of Artificial Intelligence," 5.

²² Reich, *The Rise of Techno-Nationalism*, 62-64.

²³ Montresor, "Techno-Globalism Techno-Nationalism and Technological Systems".

²⁴ Erkkilä, "Global AI Indicators and AI Policy: Metrics, Policy Scripts, and Narratives," 811-813.

More recent work shows that AI governance is increasingly shaped by geopolitical dynamics rather than purely technical concerns.²⁵ National AI strategies often operate symbolically, signalling innovation ambitions rather than establishing enforceable regulatory mechanisms.²⁶

Scholars also document growing attempts by Global South actors to intervene in debates historically dominated by the US, EU, and China²⁷. Calls for plural governance models advocate alternative digital strategies to reduce reliance on dominant ecosystems.²⁸ Taken together, this literature points to a shift from viewing AI governance as a technical regulatory problem to understanding it as a form of political contestation shaped by power asymmetries and capacity constraints.²⁹ Accordingly, this study contributes to this literature by exploring how Brazil, India, Indonesia and Singapore construct and interpret AI governance amid sovereignty tensions, strategic autonomy goals, and international pressure.

The ‘Third Way’: The ‘Sovereignty-Internationalism Paradox’ and ‘Digital Federalism’

AI governance exposes a structural paradox between sovereign control and the borderless nature of digital systems. Traditional Westphalian sovereignty assumes territorially-bound jurisdiction, but digital infrastructures operate transnationally, limiting the ability of states to regulate data flows and algorithmic processes within clear borders.³⁰ Ishkhanyan (2025) conceptualises this tension as the ‘sovereignty-internationalism paradox’: governments seek to assert control over AI policy, but the AI systems they regulate operate across borders and therefore require international cooperation.

This tension is reflected in the major governance models currently discussed in the literature. The EU adopts a precautionary, rights-based approach grounded in risk mitigation and regulatory decentralisation, reflecting liberal normative priorities.³¹ The US prioritises innovation-led governance driven by market leadership and private-sector governance, with limited federal intervention.³² China, by contrast, employs a vertically-integrated, state-directed model focused on technological acceleration and central control over data infrastructures.³³ While these models differ significantly, they share one common

²⁵ Veale et al., “AI and Global Governance: Modalities, Rationales, Tensions,” 257.

²⁶ Fatima et al., “National Strategic Artificial Intelligence Plans,” 8.

²⁷ Ulnicane, “Intersectionality in Artificial Intelligence: Framing Concerns and Recommendations for Action,” 3.

²⁸ Belli, “BRICS Countries and AI Sovereignty: An Emerging Multilateral Approach?,” 11.

²⁹ Cath, “Governing Artificial Intelligence: Ethical, Legal and Technical Opportunities and Challenges,” 5.

³⁰ Ishkhanyan, “The Sovereignty-Internationalism Paradox in AI Governance,” 4.

³¹ Veale et al., “AI and Global Governance: Modalities, Rationales, Tensions,” 257.

³² Raymond and DeNardis, “Multistakeholderism: Anatomy of an Inchoate Global Institution,” 24.

³³ Belli, “BRICS Countries and AI Sovereignty: An Emerging Multilateral Approach?,” 6.

limitation: none fully resolve the tension between sovereign policy ambition and the transnational nature of AI systems.³⁴

To address this gap, Ishkhanyan (2025) proposes ‘digital federalism’, based on distributed authority and multi-tiered governance.³⁵ Instead of requiring full harmonisation, it distributes coordination across different governance levels, making it particularly relevant for regional platforms like BRICS and ASEAN.³⁶ Within this context, the idea of a “Third Way” emerges as a response to the ‘sovereignty-internationalism paradox’ tension. Rather than aligning fully with existing US, EU, or Chinese models, it suggests that states may pursue hybrid approaches that combine elements of strategic autonomy with selective international engagement.³⁷

Global AI Governance as a Fragmented Regime Complex

AI governance increasingly operates within what scholars describe as a decentralised, polycentric ‘regime complex’, where multiple, partially connected institutions interact without a clear hierarchy or enforcement mechanisms.³⁸ Regulation emerges through a mosaic of international standard-setting organizations, private industry actors, national regulatory systems, and multistakeholder initiatives, each shaping different aspects of AI policy.³⁹ This fragmentation produces regulatory asymmetry, allowing powerful actors such as the US, EU, and China to exert disproportionate influence on global governance norms.⁴⁰

Rather than operating within a single coherent system, AI governance emerges across overlapping and often competing institutional arenas. This fragmentation shapes how actors such as ASEAN and BRICS position themselves, balancing engagement with existing frameworks against efforts to reduce dependence on dominant powers.⁴¹

³⁴ Ishkhanyan, “The Sovereignty-internationalism Paradox in AI Governance,” 7.

³⁵ Ibid., 4.

³⁶ Tallberg et al., “The Global Governance of Artificial Intelligence,” 8.

³⁷ Belli, “BRICS Countries and AI Sovereignty: An Emerging Multilateral Approach?,” 12.

³⁸ Tallberg et al., “The Global Governance of Artificial Intelligence,” 6f..

³⁹ Raymond and Denardis, “Multistakeholderism: Anatomy of an Inchoate Global Institution”, 24.

⁴⁰ Veale et al., “AI and Global Governance: Modalities, Rationales, Tensions,” 257.

⁴¹ Tallberg et al. , “The Global Governance of Artificial Intelligence,” 8.

Digital Sovereignty and AI Sovereignty Narratives

Sovereignty discourse has become a prominent, analytical lens in AI governance, with scholars emphasising control over data and infrastructure as core components of national autonomy.⁴² In this view, AI governance functions as a means of protecting strategic interests and reducing dependency on technological ecosystems led by the EU, US and China. This logic is especially visible within BRICS, where states promote alternative governance models to mitigate reliance on these external platforms and advance plurilateral cooperation.⁴³

A recurring theme in the literature is the gap between sovereignty claims and the structural capacity to realise them. For instance, Fatima *et al.* (2020) highlight that while national frameworks often set out ambitious governance goals, material constraints undermine their implementation.

Overall, the literature frames digital sovereignty less as a fixed condition than as an ongoing negotiation between political ambition and structural constraint.⁴⁴ This tension is particularly relevant for this study, as it helps explain how states like Brazil, India, Indonesia and Singapore articulate sovereignty in their AI strategies, and the extent to which these claims can be translated into effective governance in practice.

Techno-Nationalism and Techno-Globalism

Techno-nationalism literature examines how states leverage technological development to assert autonomy and geopolitical influence. Reich (1997) first advanced the idea that technological capability functions as a form of economic power essential for national competitiveness.⁴⁵ Building on this, Levi-Faur (1997) positioned state-led innovation policies as tools of geopolitical positioning rather than solely economic planning. Rather than debating whether governance should regulate or enable AI, this perspective shifts attention to how technological leadership reinforces national sovereignty.

Montresor (2001) identifies a structural tension central to contemporary AI governance. That is, countries seek to reduce dependence on external infrastructures while remaining tied to global supply chains

⁴² Erkkilä, “Global AI Indicators and AI Policy: Metrics, Policy Scripts, and Narratives,” 1138-29.

⁴³ Belli, “BRICS Countries and AI Sovereignty: An Emerging Multilateral Approach?,” 11.

⁴⁴ Saba, “Artificial intelligence (AI)-Poverty-Economic Growth Nexus in selected BRICS-Plus countries.”; Putra, “Governing AI in Southeast Asia.”; Perera et. al., “Indigenous Peoples and Artificial Intelligence: A Systematic Review and Future Directions.”

⁴⁵ Reich, *The Rise of Techno-Nationalism*, 62-64.

and interoperable standards.⁴⁶ Protecting critical infrastructures while maintaining access to international innovation networks is the dual imperative here, rather than technological isolationism.⁴⁷

Regional AI Governance Approaches

Comparative literature on AI governance tends to focus on actors such as the US, China, and the EU. As Radu (2021) observes, technologically advanced nations set the benchmark for AI innovation, prompting a need to assess how so-called ‘developing’ countries position their strategies in relation to these models or whether they pursue alternative approaches.⁴⁸

This gap is particularly visible in comparative work across regional groupings such as BRICS and ASEAN, where governance dynamics are shaped by both national priorities and distinct regional logics. ASEAN is characterized by the “ASEAN Way,” a consensus-driven, non-interventionist mode of cooperation.⁴⁹ AI is projected to be a major driving force for economic growth of the region - one of the fastest-growing internet user bases - by increasing the region's GDP between 10% and 18% of GDP by 2030.⁵⁰

BRICS emphasizes strategic autonomy and plurilateral coordination in response to Western technological dominance.⁵¹ These differing frameworks suggest that regional context may play a role in shaping how AI governance is articulated and implemented. Ultimately, the literature demonstrates that although each country seeks greater autonomy, they all face institutional limitations and dependence on global technology systems.

National AI Governance in BRICS

Brazil

Brazil's AI governance is often described as fragmented and strategically inconsistent. PL 2338/2023 presents Brazil as a rights-based regulator grounded in constitutional principles and human

⁴⁶ Montresor, “Techno-Globalism Techno-Nationalism and Technological Systems”.

⁴⁷ Erkkilä, “Global AI Indicators and AI Policy: Metrics, Policy Scripts, and Narratives,” 1130.

⁴⁸ Radu, “Steering the Governance of Artificial Intelligence: National Strategies in Perspective.”

⁴⁹ Putra, “Governing AI in Southeast Asia,” 2.

⁵⁰ Prilliadi, *Harnessing AI for ASEAN's Future*; Weno et al., “Artificial Intelligence (AI) and Digital Transformation in the ASEAN Region.”

⁵¹ Belli, “BRICS Countries and AI Sovereignty: Introduction to Thematic Section,” 11.; Putra, “Governing AI in Southeast Asia: ASEAN's Way Forward,” 4.

dignity,⁵² but policy debates also extend to sustainability, labour, and collective rights.⁵³ In practice, political instability has weakened any coherent governance structure, and implementation often depends on temporary task forces and foreign technology providers.⁵⁴ Brazil increasingly invokes sovereignty rhetoric within BRICS, but its dependence on transnational platforms still limits regulatory independence.⁵⁵

India

India adopts a hybrid model centered on innovation, digital public infrastructure, and economic competitiveness.⁵⁶ Digital India and the National Programme on AI prioritize rapid development, but regulatory capacity remains uneven across regions.⁵⁷ Sovereignty narratives remain central to policy discourse, especially around technological self-reliance and geopolitical positioning, yet these ambitions are tempered by continued dependence on private-sector partnerships and external infrastructures.⁵⁸ India therefore represents a pragmatic balancing approach: sovereignty is a strategic goal, but it is pursued through selective integration into global technological and governance networks.

National AI governance in ASEAN

Singapore

Singapore uses a centralized, top-down soft-law model under Smart Nation 2.0.⁵⁹ Its AI Governance Framework provides voluntary guidance on responsible AI use,⁶⁰ supported by AI Verify as a transparency and accountability toolkit.⁶¹ Singapore also uses regulatory sandboxes, allowing companies

⁵² Belli, “Exploring the Key AI Sovereignty Enablers (KASE) of Brazil, toward an AI Sovereignty Stack,”

⁵³ Neto et. al., “Brazil’s Artificial Intelligence (PBIA) of 2024: Enabler of AI Sovereignty?,” 3f.; Grohmann et. al., “AI Policy Debates in Brazil: Struggles Over Regulation, Governance and Labour,” 215-17.

⁵⁴ Mesquita et al., “Regulating Artificial Intelligence in Brazil,” 74-76.; Schiavi et al., “Where does digital Sovereignty lie in Building the Brazilian Smart City?,” 5.

⁵⁵ Belli, “BRICS Countries and AI Sovereignty: Introduction to Thematic Section.”

⁵⁶ Marda, “Artificial Intelligence Policy in India,” 3f.

⁵⁷ Fatima et al., “National Strategic Artificial Intelligence Plans,” 9.; Saba, “Artificial Intelligence (AI)-Pverty-Economic Growth Nexus in Selected BRICS-Plus Countries.”

⁵⁸ Belli, “BRICS Countries and AI Sovereignty: Introduction to Thematic Section.”

⁵⁹ Fong, “From Paper to Practice: Utilizing the ASEAN Guide on Artificial Intelligence,” 14.; Frana, “Assessing Smart Nation Singapore as an International Mode for AI Responsibility.”

⁶⁰ Ibid., 7-8.

⁶¹ Frana, “Assessing Smart Nation Singapore as an International Mode for AI Responsibility,” 13.; AI Verify Foundation, “AI Verify Foundation: Building Trust through Ethical AI.”

to test new AI applications under close supervision but relaxed rules.⁶² The overall approach encourages innovation while remaining tightly coordinated by the government.

Indonesia

Indonesia faces a more difficult challenge to advance their AI governance because its current political structures surrounding it are very decentralized causing integration and efficiency issues, while its digital economy (about 8% of GDP) is not very competitive due to its AI skill shortage and underdeveloped R&I ecosystem.⁶³ Its National AI Strategy 2020 to 2045 and “Golden Indonesia 2045” agenda are ambitious, but implementation remains challenging because the rules are non-binding and local capacity is uneven.⁶⁴ Local governments often lack clear AI-specific rules, skilled AI talent, and sufficient data infrastructure,⁶⁵ while foreign tech firms remain powerful.⁶⁶ For example, the largest tech investment took place in 2024 when Microsoft made a \$1.7 billion AI and cloud investment to build data centers and train people in Indonesia.⁶⁷ In the same year, SpaceX’s Starlink satellite was deployed to increase the accessibility to the internet in remote communities (Global Connectivity Index) in order to enable broader AI adoption.⁶⁸ Indonesia is therefore moving toward a more formal risk-based framework shaped by the OECD AI Principles and the EU AI Act, though the transition is still uneven.

Key Gaps and Contributions to the Literature

Three key gaps remain visible in the literature. Comparative work on Global South AI governance is still limited, especially across ASEAN and BRICS. Much of the literature also focuses on formal policy outputs, while underplaying how strategies function as narratives and signals of intent. Finally, the idea of

⁶² Frana, “Assessing Smart Nation Singapore as an International Mode for AI Responsibility,” 5.

⁶³ Wadipalapa et al., “An Ambitious Artificial Intelligence Policy in a Decentralized Governance System,” 65.; Wahyu et. al., “Indonesia’s Digital Transformation Imperative,” 2f.

⁶⁴ Wadipalapa et al., “An Ambitious Artificial Intelligence Policy in a Decentralized Governance System,” 76-78.; Regulations.AI, “Indonesia - Summary of AI Regulations.”; Bappenas, Indonesia 2045: Berdaulat, Maju, Adil, dan Makmur.; Regulations.AI, “Overview of AI Regulations Globally,” 262ff.

⁶⁵ Wadipalapa et al., “An Ambitious Artificial Intelligence Policy in a Decentralized Governance System,” 83.; Ibid., 84.

⁶⁶ Ibid., 87.

⁶⁷ Microsoft, “Microsoft Announces US\$1.7 Billion Investment.”

⁶⁸ Teresia, “SpaceX’s Unit Starlink Secures Indonesia Operating Permit.”; Wahyu et. al., “Indonesia’s Digital Transformation Imperative,” 2.

a “Third Way” remains under-specified and rarely tested empirically.⁶⁹ This study addresses those gaps through a comparative, interpretive analysis of Brazil, India, Indonesia, and Singapore. It uses policy documents and elite interviews to examine whether hybrid approaches emerge in practice.⁷⁰

Research Question

How are AI national policies within selected ASEAN and BRICS countries shaping their own ways of AI governance amid rising techno-nationalism?

Sub-questions:

- *Are ASEAN and BRICS member states pursuing an alternative path in AI governance that correlates with the conceptualization of the “Third Way”?*
 - *If yes, how do they do it?*
- *What do people on the ground in these four countries believe is an appropriate way of thinking about AI governance?*

THEORETICAL FRAMEWORK

This project adopts a critical-interpretive qualitative methodology. Following Chatzichristos (2025), it treats AI governance as socio-political rather than neutral. It reads national strategies as discursive and political constructs through which states frame sovereignty, development, risk, and identity.⁷¹ This critical-interpretive lens is particularly suited to analyzing the governance trajectories of Brazil, India, Singapore, and Indonesia, whose policy frameworks are shaped by diverse developmental imperatives, institutional capacities, and geopolitical ambitions. Lastly, it is useful to examine underlying logics behind them, especially techno-nationalism and the articulation of a potential ‘Third Way’.

⁶⁹ Tallberg et. al., “The Global Governance of Artificial Intelligence.”; Fatima et. al., “National Strategic Artificial Intelligence Plans,” 9.; Belli, “BRICS Countries and AI Sovereignty: Introduction to Thematic Section,” 11.; Ishkhanyan, “The Sovereignty-Internationalism Paradox in AI Governance,” 6.

⁷⁰ Belli, “BRICS Countries and AI Sovereignty: An Emerging Multilateral Approach.”; Ishkhanyan, “The Sovereignty-Internationalism Paradox in AI Governance.”

⁷¹ Chatzichristos, “Qualitative Research in the Era of AI,” 7.; Ishkhanyan, “The Sovereignty-Internationalism Paradox in AI Governance,” 7-9.

Governance of Artificial Intelligence

The term “Artificial Intelligence” (AI) was coined by the computer scientist John McCarthy in 1955.⁷² Since the 1950s, defining AI has become increasingly complex due to rapid technological advancements and shifting goalposts (“AI effect”). Nowadays, AI systems are no longer theoretical constructs but complex socio-technical systems composed of several interdependent data infrastructure components with legal and ethical implications.⁷³ For that reason, the study adopts the OECD definition, as outlined in its *Recommendation of the Council on AI*, since it is internationally recognized and suited to regulatory contexts.⁷⁴ To regulate the AI space and uphold national priorities, nation-states publish AI strategies and policies to balance opportunity with risk, maximizing AI’s economic, scientific, and societal benefits while minimizing ethical, legal, and security challenges.⁷⁵ Notably, AI policy refers to operational rules, while AI strategy is the broader macro-decision-making roadmap that shapes them.⁷⁶

Moreover, the discussion on how AI ought to be governed is located at the nexus between its political and technical conceptualization. Politically, the debate revolves around how AI can be utilized for the good of society and who holds the regulatory power to determine its usage and application. The technical intersection refers to the engineering aspects of how political objectives can be executed at a technical level. This paper is situated in the political arena, making it the sole imperative to identify and define important terms that underpin the governance of AI. Subsequently, concepts such as ‘Digital Sovereignty’ and ‘Soft and Hard AI Laws’ will be unpacked.

Digital Sovereignty

The notion of digital sovereignty is rooted in the idea that a state has an exclusive right to control a bounded territory. Considering that the digital space is not physical, the Tallinn Manual notes that “states enjoy sovereign authority with regard to cyber infrastructure, persons, and cyber activities located within its territory.”⁷⁷ The problem posed by a lack of a physical cyberspace has been resolved by the International

⁷² McCarthy et. al., “Research Project on Artificial Intelligence.”

⁷³ Dafoe, “AI Governance: Research Agenda,” 15-21.

⁷⁴ OECD, Artificial Intelligence,” in *OECD Recommendations of the Council on AI*, “An AI system is a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations or decisions that may influence physical or virtual environments. Different artificial intelligence systems vary in their levels of autonomy and adaptiveness after deployment.”

⁷⁵ Dafoe, “AI Governance: Research Agenda,” 39-47.

⁷⁶ Nordstrom, “AI under Great Uncertainty: Implications and Decision Strategy for Public Policy.”; Maas, “Concepts in Advanced AI Governance,” 44.

⁷⁷ Cambridge University Press and Assessment, “Tallinn Manual 2.0,” 11

Group of Experts (IGE). They noted that although cyberspace itself is not territorial in nature, actions on it can affect persons within sovereign territories.⁷⁸ Therefore, the definition of ‘Digital Sovereignty’ that is adopted is derived from the Tallinn Manual 2.0

Soft and Hard Law Approaches To Govern AI

Soft laws can be formal or informal non-binding commitments (e.g. Singapore’s Model AI Governance Framework) or ideals that have no legal punitive power. ‘Hard law’ on the other hand, refers to aspects of any AI governance structure that are enforceable and formally enshrined as legislation/international treaty.⁷⁹ This distinction helps compare cases with different mixes of voluntary and legal instruments,⁸⁰ with an example of hard law being India’s upcoming National AI Technology Regulatory Authority (NATRA), which will be a body to govern AI in India and will be established by coded legislation.

Techno-Nationalism

The notion that technological capacity is intrinsically linked to a nation’s power and security emerged in the Cold War context and is understood under the term ‘techno-nationalism’ which was coined in 1997 by US economist Robert Reich.⁸¹ This understanding was explicitly codified in policy approaches, notably in the 1960s in Japan under the national slogan “gijutsu rikkoku” which translates to “nation-building with technology.”⁸² Essentially, “techno-nationalism stands at the intersection between economic/technological development and national security.”⁸³ Since then, the concept has undergone a resurgence accompanied by the movement of de-globalization and decoupling, rivalry, and tighter controls on foreign tech, making AI governance part of a wider struggle over growth and autonomy.⁸⁴ In the

⁷⁸ Roguski, “Layered Sovereignty,” 349-352.

⁷⁹ Roguski, “Layered Sovereignty,” 349-352..

⁸⁰ Shelton, “Soft Law”, 2-7.; Ishkhanyan, “The Sovereignty-Internationalism Paradox in AI Governance.”; Abbott and Snidal, “Hard and Soft Laws in International Governance,” 424.

⁸¹ Reich, “The Rise of Techno-Nationalism.”

⁸² Nakayama, Techno-Nationalism versus Techno-Globalism,” 9.

⁸³ Bitzinger, “Technonationalism and Emerging Technologies in Smaller States,” 4.

⁸⁴ Nakayama, “Techno-Nationalism versus Techno-Hlobalism.”; Bitzinger, “Technonationalism and Emerging Technologies in Smaller States,” 4.; Reich, “The Rise of Techno-Nationalism.”; Dafoe, “AI Governance: Research Agenda,” 41-47.; Levi-Faur, “Economic Nationalism: From Friedrich List to Robert Reich,” 364ff, 365f.; Helleiner, *Economic Nationalism as a Challenge to Economic Liberalism*, 308; List as cited by Levi-Faur, “Economic Nationalism: From Friedrich List to Robert Reich,” 360.; Montresor, “Techno-globalism, Techno-nationalism and Technological Systems”; Fang and Hwang, “What is Techno-Nationalism?”, 1-6; Luo, “Illusions of Techno-Nationalism.”

literature, ‘techno-nationalism’ forms a subgroup in the broader and older scholarly debate around economic nationalism - one of the three principal schools of political economy.⁸⁵

Essentially, the concept links a country’s national and economic prosperity, and social stability to technological capabilities, bolstering the two beliefs that the success of a nation is dependent on how well it diffuses, harnesses, innovates technology, and that foreign direct investment (FDI) inflows and research & development (R&D) are critical for driving national growth and prosperity.⁸⁶

Research Design and Methods

The project employs a multi-method qualitative design, combining qualitative content analysis of national AI policy documents with semi-structured interviews with policymakers, experts, practitioners, and civil society actors, and a hybrid deductive-inductive coding strategy. This allows within-case and cross-case comparison while reflecting the layered nature of AI governance across national, regional, and transnational levels.⁸⁷ These interviews take the form of flexible, guided conversations that allow for in-depth probing while maintaining thematic focus. Together, these methods support both within-case (national) and cross-case (regional and comparative) analysis, and reflect emerging scholarship that AI governance is increasingly more hybrid.

The analysis proceeds through a three-layer logic that guides both the policy analysis and the interview (coding) strategy:

- 1) **Within-Case:** Each country is examined for governance logics, institutional capacity, political contestation, and sovereignty narratives through the independent examination of the national AI governance policies.
- 2) **Cross-case:** The four cases are compared to identify convergence and divergence between case study countries (within ASEAN and BRICS contexts).

⁸⁵ Levi-Faur, “Economic Nationalism: From Friedrich List to Robert Reich,” 364ff.

⁸⁶ Dafoe, “AI Governance: Research Agenda,” 41-47

⁸⁷ Schreier, “Qualitative Content Analysis in Practice.”; Belli, “BRICS Countries and AI Sovereignty: An Emerging Multilateral Approach”; Ishkhanyan, “The Sovereignty-Internationalism Paradox in AI Governance.”; Creswell and Poth, *Qualitative Inquiry and Research Design*, 2018.

- 3) **Regional:** The ‘Third Way’ question is addressed by examining patterns of alignment and divergence within the regional AI governance structures of ASEAN and BRICS of each case study country.

Case Selection

Case selection follows a purposeful sampling logic, prioritizing interpretive depth, contextual richness, and analytical relevance, consistent with Creswell and Poth's (2018) principles for small-N qualitative research. The four cases were purposefully selected on two grounds, ensuring interpretive depth and feasibility.

Data Availability and Feasibility

Each country offers publicly accessible AI strategies, drafts, or enacted legislation and digital transformation plans. The cases are feasible because they have public strategies, active debates, and identifiable stakeholders. They also have enough maturity and hold regional significance, allowing for interpretive comparison.⁸⁸

Regional Leadership and Policy Maturity

The selected cases also play central roles in shaping regional AI governance, reflecting Belli's (2024) argument that Global South states are not passive adopters of Western or Chinese AI frameworks, but instead articulate plural and hybrid forms of digital sovereignty.

Singapore is ASEAN's de facto AI governance leader, driving regional standard-setting and capacity-building. Indonesia, despite institutional constraints, has shaped ASEAN digital norms through its political weight and a distinct developmental trajectory.⁸⁹ Despite facing institutional and structural constraints such as lack of foreign direct investment in digital infrastructure, Indonesia has been influential in shaping ASEAN digital norms due to its status as the region's largest economy, its substantial demographic weight as the fourth most populous country in the world, and its growing role within ASEAN,

⁸⁸Schreier, “Qualitative Content Analysis in Practice.”; Vaismoradi et al., “Content Analysis and Thematic Analysis,” 400.; Belli, “BRICS Countries and AI Sovereignty: An Emerging Multilateral Approach”; Ishkhanyan, “The Sovereignty-Internationalism Paradox in AI Governance”; Cho and Lee, “Qualitative Content Analysis,” 4.

⁸⁹ Putra, “Governing AI in Southeast Asia,” 2ff.

particularly through its engagement with the ASEAN Digital Masterplan⁹⁰ and its navigation of competing US and Chinese digital governance pressures.⁹¹ Moving over to BRICS member states, India occupies a pivotal role in the institution by advancing digital sovereignty through its Digital Public Infrastructure model and its role in the Global Partnership on Artificial Intelligence.⁹² Brazil, meanwhile, offers a rights- and community-based Global South case, marked by fragmentation, political contestation, and institutional volatility.⁹³

Taken together, these cases allow unpacking Belli's (2024) argument that so-called Global South states are not passively adopting Western or Chinese frameworks but might articulate plural and hybrid forms of digital sovereignty. The sample therefore supports a theoretically grounded and regionally representative examination of potential 'Third Way' governance models.

1. QUALITATIVE CONTENT ANALYSIS OF NATIONAL AI STRATEGY DOCUMENTS

Policy analysis alone cannot reveal informal dynamics or political bargaining, but it is essential for mapping the official frameworks within which governance unfolds. This study adopts a qualitative content analysis approach to examine the narratives, and underlying logics embedded in policy documents, treating it as a “systematic coding and categorizing approach used for exploring large amounts of textual information unobtrusively to determine trends and patterns.”⁹⁴

Document corpus

The corpus includes national AI strategies and action plans, enacted AI legislation, digital economy strategies, and cybersecurity policies, relevant to AI deployment and governance across the four case countries. Moreover, it draws on regional and intergovernmental frameworks (e.g. ASEAN AI principles, BRICS digital declarations) to contextualize and interpret national positions within the broader regional governance architectures.

⁹⁰ ASEAN, “ASEAN Digital Masterplan.”

⁹¹ Fazriel and Aprilliani, “The Role of the ASEAN Digital Masterplan.”; Winarni and Bundianto, “Digitalization of Bureaucracy and Good Governance.”; Negara, “Political Economy of Indonesia-China Digital Cooperation.”

⁹² Belli, “BRICS Countries and AI Sovereignty”, 2-3.

⁹³ Ibid., 3-4.

⁹⁴ Vaismoradi et al., “Content Analysis and Thematic Analysis,” 400.

Analytical Focus and Coding Strategy

Guided by Fatima et al.'s (2025) finding that AI strategies encode implicit narratives about power, trustworthiness, and geopolitical identity, the document analysis aims to surface how each case study country articulates its AI governance approach and positions itself in relation to digital sovereignty and potential Third Way alternatives. Policy documents and white papers were selected based on their relevance, reflecting the debate around how AI governance ought to be approached on a national level. Rather than treating policy documents as neutral records, they are read as performative texts, that is, official constructions of national identity, institutional capacity, and geopolitical orientation. The thematic structure mirrors the interview coding framework, organizing analysis around national priorities, governance capacity, policy drivers, sovereignty and dependence, the regional dimension, and the Third Way. The themes were used to structure the analysis of the characteristics and framing of AI governance, allowing for systematic comparison across cases.

In practice, this involved working through each policy document section by section, annotating passages, recording interpretive notes, and extracting direct quotations to anchor the analysis in the precise language of the documents. This close-reading method ensures that governance models, institutional architectures, the mix of hard and soft instruments, sovereignty claims, international alignment, and the framing of risk and development are traced not only thematically but in the actual terms policymakers use.⁹⁵ Attending to specific wording matters here: as Fatima et al. (2025) show, the language of AI strategy is never merely descriptive but constitutive of the governance logics it purports to document.

2. SEMI-STRUCTURED INTERVIEWS

Semi-structured interviews complement document analysis by capturing the political bargaining and institutional tensions that policy texts cannot reveal, dimensions that Knott et al. (2022) identify as essential for understanding how actors make sense of complex governance environments. During the outreach phase, approximately 200 emails were sent to experts across Indonesia, India, Singapore, and Brazil, of which 20 accepted an invitation to participate (see Appendix 1). In terms of participant selection, interviewees were identified through purposive sampling to incorporate stakeholders and experts from the

⁹⁵ Schreier, “Qualitative Content Analysis in Practice.”; ASEAN Secretariat, “ASEAN Guide on AI Governance and Ethics.”; BRICS, “BRICS’s Leader Statement on the Global Governance of Artificial Intelligence.”; Vaismoradi et. al., “Content Analysis and Thematic Analysis,” 400.

government, the public sector and private sector, and civil society. Snowball sampling was layered into the methodology to identify additional experts following initial interviews.⁹⁶

Interview Design

As stated, interviewees were selected purposively and through snowball sampling, with questions structured around the same main themes (see Appendix 2.).⁹⁷ Prior to each interview, participants received an information sheet (Appendix 3) explaining the scope of the research and thematic structure and a consent form (Appendix 4). Recordings were made only where permission was granted. Interviews were then transcribed securely, anonymized, and analyzed using reflexive thematic analysis.

Following Kvale and Brinkmann (2015), the semi-structured format allows flexibility while maintaining thematic coherence. This is consistent with Braun and Clarke's (2022) reflexive approach, which treats interviews as sites of meaning construction rather than sources of fixed data. Questions were structured around six thematic areas (see Appendix 2): national AI governance priorities and constraints; governance capacity; policy drivers; sovereignty and dependence; the regional dimension (ASEAN and BRICS); and the existence or desirability of a 'Third Way.'

Thematic Coding Strategy and Analysis

After concluding the interviews, the four researchers were randomly assigned an interview for one of the four case study countries to participate in inductively developing codes that describe the [detail of] the respective category (see Appendix 5.). Notably, a 'category' is understood as a "broad idea or concept which a number of more specific content codes have been grouped" under.⁹⁸ The categories were set up in alignment with the interview question categories (National Priorities, Governance, Policy Drivers, Sovereignty & Dependence, Regional Dimension, and Third Way) for which then the subcategories were inductively derived (see Appendix 5). By comparing the produced codes/subcategories, the researchers formulated a codebook that aims to illustrate divergences and convergences of each country's policy approaches. The categories ensure the analysis conducted by the four researchers remained consistent, allowing for a structured comparison of how the differing countries approached similar issues.

⁹⁶ Noy, "The Hermeneutics of Snowball Sampling."

⁹⁷ Noy, "The Hermeneutics of Snowball Sampling."; Kvale and Brinkmann, *Interviews*.

⁹⁸ Braun and Clarke, "Using Thematic Analysis in Psychology."

Validity and Reliability

The study follows Creswell and Poth's trustworthiness criteria. Credibility is supported through triangulation and, where possible, member checking with interviewees. Dependability is maintained through systematic coding documentation and reflexive memos; confirmability through explicit positionality and separation of data and interpretation; and transferability through thick case description, enabling readers to assess the applicability of findings to comparable governance contexts.⁹⁹

Ethical Considerations

This research is conducted with strict adherence to the IHEID's Research Ethics Guidelines.¹⁰⁰ In line with these, no interviewee was recorded without their informed consent. Where the interviewee requested anonymity, that request is honored in all sincerity. The writers affirm that the research was done in an unbiased manner and that there are no conflicts of interests. If the interviewee reveals politically sensitive information, special care has been taken to maintain discretion such that the interviewee's safety in their home country is not affected. A strict approach is taken in this paper to ensure all sourced information is duly cited to the proper source/author. All research data is reported as is with no alterations made.

Data management guidelines encoded in the Research Ethics Guidelines have been followed¹⁰¹. There are some additional processes that are followed. Confidential data is password protected. All the data is clearly documented and preserved transparently. Data has not been used for anything other than the stated purpose.

Limitations

The study is limited by its reliance on secondary sources and interviews. It cannot fully capture community-level understandings or overcome the constraints of a small-N design. Interview access and transcription limits may also affect coverage. Even so, the project offers a first comparative glance at how

⁹⁹ Creswell and Poth, "Trustworthiness Criteria."

¹⁰⁰ IHEID, "IHEID Research Ethics."

¹⁰¹ IHEID, "IHEID Research Ethics."

India, Brazil, Singapore, and Indonesia shape AI governance under techno-nationalism, and it points to the need for broader and longer-term research.

DOCUMENT FINDINGS

Each of the four countries chosen as focal points for this research has provided a rich collection of information through both their publicly available documents and the five interviews conducted per case study country.

Together, the policy documents and interviews from each country illustrate a range of governance models and approaches. Whether it is a state-coordinated, rights-based model or a flexible, multi-layered regulatory regime, an analysis of their national approaches provides a foundation for understanding how these nation-states balance technological advancement, national sovereignty, and ethical imperatives in respect of AI governance in the midst of rising techno-nationalism. Furthermore, an important section of the analysis asks how much the AI governance strategies of the case study countries align with BRICS and ASEAN frameworks. It unequivocally demonstrates that national concerns currently outweigh any unified bloc-level strategy. The analyses below reveal distinct national paths within these groupings rather than any singular, cohesive, regional framework.

Indonesia - Document Findings

Indonesia's AI strategy is embedded within a broader developmental agenda, with AI framed primarily as an economic accelerant rather than a governance challenge. The central objective is *Visi Indonesia Emas 2045* ("Golden Indonesia 2045") which targets a transition from upper-middle to high-income status, with AI projected to contribute up to USD 366 billion to GDP by 2030.¹⁰² This growth-first orientation is further reflected in Indonesia's OECD accession process, where AI governance alignment is partly driven by external conditionality rather than purely domestic demand."

Central to the analysis is the "Strategi Nasional Kecerdasan Artifisial 2020-2045 (Stranas AI)" that acts as the primary policy roadmap, identifying the following five priority high-impact sectors for the development and deployment of AI: healthcare, bureaucratic reform, education, food security, and smart cities.¹⁰³ The recently published national AI roadmap, "*Buku Putih - Peta Jalan Kecerdasan Artifisial*"

¹⁰² Kearney, "Accelerating Indonesia's Economic Growth."

¹⁰³ BPPT, *Strategi Nasional Kecerdasan Artifisial Indonesia 2020–2045*, 3-5.

(2026), by KOMDIGI (Kementerian Komunikasi dan Digital, Ministry of Communication and Digital Affairs), explicitly outlines five areas that need to be prioritized in the implementation: 1) Ethics and fundamental rights; 2) Data governance and privacy; 3) Safety and robustness; 4) Cybersecurity and model security; 5) Risk management and conformity; 6) Institutional capacity and R&D; and 7) Market and international alignment.¹⁰⁴ The more recent *Buku Putih* (2025), produced with input from a 443-person multi-stakeholder task force, expands the sectoral priorities to ten fields aligned with President Prabowo's *Asta Cita* agenda and sets concrete targets of 100,000 AI talents per year and AI literacy for 20 million citizens by 2029. It also includes an international benchmarking analysis drawing on the governance approaches of the US, UK, EU, China, Japan, India, Singapore, and Malaysia, signaling a more comparative policy orientation than its predecessor.

In terms of implementation, the policy papers outline a three-stage phased implementation plan (three stages) that is in line with their “*Konsep Pedoman Etika Kecerdasan Artifisial*” (Concept of AI Ethics Principles) brought out by the Direktorat Jenderal Ekosistem Digital.¹⁰⁵ However, KOMDIGI acknowledges that Indonesia remains in the preparatory phase, with binding regulations still to be formalized. The key instrument intended to address these issues is a Draft Presidential Regulation (*Rancangan Perpres*) on AI ethics and safety. After missing a September 2025 target, the regulation was pushed to early 2026 and remains under legal review. Once issued, it is intended to function as an umbrella regulation establishing horizontal principles across all sectors. A draft AI Law (*RUU AI*) is also progressing through parliament, intended to eventually establish a permanent National AI Authority. The repeated delays illustrate the structural tension between ambition and institutional capacity that defines Indonesia's current governance moment.

A recurring weakness across the documents is fragmentation across agencies with distinct mandates. While KOMDIGI formally leads coordination, BSSN handles cybersecurity resilience of AI models, OJK governs AI in the financial sector, and BRIN oversees national standards and research ethics. The financial sector is comparatively advanced: OJK's 2025 banking AI governance guidelines mandate a human-in-the-loop approach for high-risk applications and require internal AI Committees with audit trails.¹⁰⁶ More broadly, the governance system lacks enforceable technical standards such as algorithmic

¹⁰⁴ KOMDIGI, *Buku Putih – Peta Jalan Kecerdasan Artifisial Nasional*, 18-24.

¹⁰⁵ Direktorat Jenderal Ekosistem Digital, Kementerian Komunikasi dan Digital, *Konsep Pedoman Etika Kecerdasan Artifisial*, 7-9.

¹⁰⁶ OJK, *Buku Panduan Tata Kelola Kecerdasan Artifisial Perbankan Indonesia*, 14-17.

audits, explainability requirements, or independent oversight mechanisms, and no unified data protection authority yet exists.

In sum, the policy documents collectively suggest a governance system in transition: moving from soft-law, aspiration-driven instruments toward a more formal, risk-based architecture drawing on the OECD AI Principles and the structural logic of the EU AI Act. However, this transition is constrained by talent shortages, infrastructure gaps, limited enforcement capacity, and the political complexity of governing AI across a decentralized archipelagic state of over 270 million people.

Singapore - Document Findings

Singapore's AI policy corpus functions as an integrated regulatory regime in which the “Smart Nation 2.0: A Thriving Digital Future for All” vision establishes a national digital agenda and multi-layered governance architecture. Under the Smart Nation 2.0 umbrella, specialized instruments such as the AI Verify Testing Framework and the Model Artificial Intelligence Governance Framework manifest this agenda into actionable, risk-based standards.¹⁰⁷ Furthermore, a broad approach outlined in Singapore's “National AI Strategy 2.0 (NAIS 2.0)” along with sector-specific guidelines, and targeted statutes also contribute to round out Singapore's AI governance approach. Altogether, the documents create a layered, hybrid model that works to balance a pro-innovation environment, data sovereignty, and ethical safeguards.

The Smart Nation 2.0 initiative establishes a broad three-pillar vision: Growth, Community, and Trust, with its ultimate stated goal being the creation of a thriving digital future for all citizens.¹⁰⁸ It is within this framework that the NAIS 2.0 is situated as the principal AI-focused pillar to translate Smart Nation objectives into concrete AI-centric goals and governance mechanisms. Aligning directly with Smart Nation's national priorities, NAIS 2.0 positions AI as a strategic driver of economic competitiveness and scientific innovation, while simultaneously reinforcing the community and trust pillars through AI-supported public service improvements (e.g. healthcare, increased administrative automation) and robust safeguards to ensure responsible, trustworthy AI use is promoted.¹⁰⁹

Singapore employs a distributed AI governance model whereby it “leverages its existing legal architecture - such as data protection, consumer rights, and sector-specific regulations - supplemented by agile, non-binding frameworks”, thus allowing for a variety of sector specific ministries and agencies to

¹⁰⁷ Government of the Republic of Singapore. *Singapore National AI Strategy 2.0.*, 2023.

¹⁰⁸ Regulations.AI, “Singapore - AI Regulation Overview.”

¹⁰⁹ Ibid.

attend to the unique needs of their respective fields.¹¹⁰ Within this multi-layered model, the AI Verify Framework operationalises governance through audit-ready evidence, while the Model AI Governance Framework establishes internal risk committees, human-in-the-loop matrices¹¹¹, and continuous monitoring.

Smart Nation 2.0's infrastructure goals reflect Singapore's push for a sovereign cloud driven by its desire for reduced foreign reliance. This is reinforced by the Personal Data Protection Act (PDPA) aligned data practices in the Model AI Governance Framework and the Agentic AI Framework that explicitly limits tool access and autonomy to preserve national data control.

Overall, the document corpus reflects a Singaporean multi-dimensional, yet unified strategic approach to AI governance. The documents align national growth ambitions with rigorous, rights-respecting governance and risk-aware controls, thus positioning Singapore as a pragmatic leader in AI regulation.

India - Document Findings

India's strategy for AI and data governance is tied to the vision of inclusive growth as mentioned in the National Strategy for Artificial Intelligence. This strategy positions AI as a tool for social impact. With certain sectors identified, like healthcare, agriculture, education, smart cities and mobility as key sectors.¹¹² To bridge gaps in expertise, it proposes a two-tier structure consisting of Centres of Research Excellence (CORE) and International Centres for Transforming AI (ICTAI)¹¹³.

AI Governance Guidelines 2025 create a practical and innovation based framework based on seven "sutras" (or points/guidelines) such as trust and safety¹¹⁴. The model operates through three main strands—enablement, regulation, and oversight—introducing keystone bodies like the AI Governance Group (AIGG) and the AI Safety Institute¹¹⁵. The strategy prioritises voluntary steps and digital public infrastructure instead of rigid rules. This approach emphasises India's focus on practical applications and inclusive outcomes. It seeks to utilise AI for addressing salient challenges across important segments while building

¹¹⁰ Regulations.AI, "Singapore - AI Regulation Overview."

¹¹¹ Human-in-the-loop (HITL) matrices are approaches within machine learning that integrate human intervention within the automated workflow to support increased accuracy and safety. It is, in effect, a built-in quality assurance process.

¹¹² NITI Aayog (National Institute for Transforming India), "National Strategy for Artificial Intelligence 2018," 4.

¹¹³ Ibid., 7.

¹¹⁴ Ministry of Electronics and Information Technology, "India AI Governance Guidelines," 5-6.

¹¹⁵ Ibid, 34-36.

institutional capacity and promoting responsible innovation. Therefore, promoting technological advancement with wider social and economic benefits. This approach (from the state’s perspective) aims to ensure that AI serves as an enabler of progress to establish coordination between the government, research bodies and the industry for achieving equitable results for society.

The Digital Personal Data Protection Act (DPDP 2023) provides a legal foundation for this framework. This act regulates the processing of personal data by defining the rights of individuals and the obligations of data fiduciaries.¹¹⁶

Furthermore, IT (Intermediary Guidelines and Digital Media Ethics Codes) rules 2021 provide a critical layer of safety and hold platforms accountable for the spread of harmful content.¹¹⁷ This act regulates the processing of personal data by clearly defining the rights of individuals as ‘Data Principals’ and specifically addressing the threats of deepfakes and misinformation.¹¹⁸ By mandating strict grievance redressal mechanisms and due diligence for intermediaries. These rules ensure that technological advancement does not compromise national security or individual safety. Collectively, these four pillars - strategic social impact, institutional oversight, data protection and intermediary accountability—create a cohesive ecosystem designed to foster a safe and globally competitive digital landscape that leverages AI for collective good. An additional pillar is the IndiaAI Mission that aims to democratise access to AI. Central to this endeavour is the AIKosh which aims to build a high quality database to develop an indigenous AI models like BharatGen AI.

Brazil - Document Findings

The policy documents suggest that Brazil’s approach to AI governance is shaped by a dual commitment to economic development and the protection of rights, within an increasingly structured and state-led framework. Across the corpus, AI is consistently framed as a tool to address structural national challenges while supporting inclusive and sustainable growth. The national AI plan, for example, presents AI as central to “transforming the lives of Brazilians through sustainable and inclusive innovations” (*“transformar a vida dos brasileiros por meio de inovações sustentáveis e inclusivas”*), while also targeting “major national, social, economic, environmental and cultural challenges” (*“grandes desafios nacionais,*

¹¹⁶ Ministry of Electronics and Information Technology, “Digital Data Protection Act,” 7-12.

¹¹⁷ Ministry of Information and Technology, “The information technology (Intermediary Guidelines and Digital Media Ethics Codes).”

¹¹⁸ Ministry of Electronics and Information Technology, “Digital Data Protection Act,” 12-15

sociais, econômicos, ambientais e culturais”).¹¹⁹ This framing is reinforced in Decree No. 12.308, which links AI to “sovereign, sustainable and inclusive socioeconomic development, with innovation” (“*desenvolvimento socioeconômico soberano, sustentável e inclusivo, com inovação*”).¹²⁰

At the same time, a strong right-based orientation runs consistently across the documents. The proposed AI law (PL 2338/2023) centres governance on “protecting fundamental rights” (“*proteger os direitos fundamentais*”) and affirms the “centrality of the human person” (“*centralidade da pessoa humana*”), while the LGPD establishes a broader legal foundation grounded in “fundamental rights of freedom and privacy” (“*direitos fundamentais de liberdade e de privacidade*”).¹²¹ Similarly, the CNJ Resolution emphasises that AI use most align with “fundamental ethical values, including human dignity [...] non-discrimination [and] due process” (“*valores éticos fundamentais, incluindo dignidade humana [...] não discriminação [e] devido processo*”).¹²² Together, these elements point to a relatively clear normative baseline in which innovation is explicitly conditioned by legal and ethical safeguards.

In terms of governance, the documents indicate a shift towards more operationalised governance structures. Earlier instruments such as the LGPD establish foundational regulatory capacity, including the creation of the ANPD, while more recent instruments introduce more detailed governance mechanisms. The national AI plan outlines a multi-layered architecture with a “Superior Council [...] Executive Committee [...] Thematic Chambers” (“*Conselho Superior [...] Comitê Executivo [...] Câmaras Temáticas*”), alongside commitments to “monitoring and review” (“*monitoramento e revisão*”).¹²³ Meanwhile, PL 2338/2023 and the CNJ Resolution introduce lifecycle oversight and mandatory risk assessments, including “algorithmic impact assessment” (“*avaliação de impacto algorítmico*”) and continuous monitoring.¹²⁴ This suggests a degree of growing governance maturity, even if implementation remains uncertain.

¹¹⁹ Brasil, Ministério da Ciência, Tecnologia e Inovação. *IA para o Bem de Todos: Proposta de Plano Brasileiro de Inteligência Artificial 2024–2028*. Brasília: Conselho Nacional de Ciência e Tecnologia, 2024. <https://www.gov.br/mcti/pt-br/acompanhe-o-mcti/noticias/2024/07/plano-brasileiro-de-ia-tera-supercomputador-e-investimento-de-r-23-bilhoes-em-quatro-anos/ia-para-o-bem-de-todos.pdf/view> (accessed December 1, 2025).

¹²⁰ Brasil, Casa Civil. *Decreto Nº 12.308/2024*. December 11, 2024. Diário Oficial da União, December 12, 2024. https://www.planalto.gov.br/ccivil_03/_ato2023-2026/2024/decreto/d12308.htm (accessed December 1, 2025).

¹²¹ Brasil, Senado Federal. *Projeto de Lei Nº 2338, de 2023*. Authored by Rodrigo Pacheco. <https://legis.senado.leg.br/sdleg-getter/documento?disposition=inline&dm=9347622> (accessed December 1, 2025).; Brasil, Presidência da República. *Lei Nº 13.709, de 14 de agosto de 2018*. Diário Oficial da União, August 15, 2018. https://www.planalto.gov.br/ccivil_03/_ato2015-2018/2018/lei/113709.htm.

¹²² Conselho Nacional de Justiça (Brasil), *Resolução Nº 615, de 11 de março de 2025* (2025), <https://atos.cnj.jus.br/files/original1555302025031467d4517244566.pdf> (accessed December 1, 2025).

¹²³ Ministério da Ciência, Tecnologia e Inovação, *IA para o Bem de Todos*, 79-80.

¹²⁴ Conselho Nacional de Justiça, *Resolução Nº 615/2025*, 6; Senado Federal, *Projeto de Lei Nº 2338/2023*, 21.

Across the documents, policy drivers do not converge around a single priority. Innovation and competitiveness are consistently emphasised - “technological development and innovation” (“*desenvolvimento tecnológico e a inovação*”) and “innovation and increased competitiveness” (“*inovação e aumento da competitividade*”) - but are systematically combined with social and ethical concerns, including “respect for dignity [...] preventing inequality” (“*respeito à dignidade [...] prevenindo a desigualdade*”).¹²⁵ Rather than subordinating rights to economic goals, the framework attempts to integrate them within a broader development strategy.

Questions of sovereignty and dependence are also prominent, particularly in the national AI plan and Decree No. 12.308, where AI is linked to strategic autonomy. The plan calls for “strengthening sovereignty in AI” (“*fortalecer a soberania em IA*”) and “reducing external dependence” (“*reduzindo a dependência externa*”), including proposals for a “sovereign cloud” (“*nuvem soberana*”), while the decree reinforces “productive and technological autonomy” (“*autonomia produtiva e tecnológica*”).¹²⁶ However, this emphasis is less visible in legal instruments, where sovereignty appears more indirectly through data protection and jurisdictional control.

Finally, the regional dimension remains limited across the documents. Although the AI plan references cooperation with “Latin America, [the] Caribbean and Africa” (“*América Latina, Caribe e África*”), there is little evidence that regional frameworks play a significant role in shaping governance.¹²⁷ Instead, the approach remains predominantly national, combined with selective alignment with global standards.

Overall, the documents point to a hybrid governance approach combining elements of right-based regulation, state coordination, and innovation policy. This is particularly visible in the coexistence of risk-based tools, such as “classification of [...] risk level” (“*classificação de [...] grau de risco*”), with strong constitutional protections and development-oriented objectives.¹²⁸ While not always explicitly framed as such, this may be interpreted as an attempt to articulate a ‘Third Way’ approach, although one still shaped by structural and external constraints.

¹²⁵ Ministério da Ciência, Tecnologia e Inovação, *IA para o Bem de Todos*, 3, 15; Casa Civil, *Decreto N° 12.308/2024*, 1.

¹²⁶ Ministério da Ciência, Tecnologia e Inovação, *IA para o Bem de Todos*, 3, 48, 63; Presidência da República (Brasil), *Decreto N° 12.308/2024*, 1.

¹²⁷ Ministério da Ciência, Tecnologia e Inovação, *IA para o Bem de Todos*, 46.

¹²⁸ Senado Federal, Projeto de Lei N° 2338/2023, 9.

Interview Findings

Indonesia - Interview Findings

Indonesia's approach to AI governance is anchored in its long-term national vision known as Golden Indonesia 2045 that prioritizes economic competitiveness, healthcare, bureaucracy, food security, and smart city development. One interviewee says, "one vision is for Indonesia to be the world's fifth-largest economy (ID-4)." For Mr. Yunkins (ID-3), "AI is a strategic lever for economic development" through capacity upgrading - AI as an enabler and not a constraint. Mrs. Diah (ID-4) similarly stresses that "AI has the potential to improve productivity, foster innovation, and address national challenges across all sectors," with the goal of promoting overall GDP growth.

However, significant governance challenges accompany this ambition. A key structural limitation is that for most people, also within the government, "AI is ChatGPT" (ID-2), and a high degree of AI integration in bureaucratic processes has not yet been reached, and digital adoption is slow. Mr. Yunkins (ID-3) identifies the root of this: "the most critical challenge is the fragmented landscape of authority," with responsibilities spread across multiple entities. Further, interviewees ID-2 and ID-5 also concur that the discussion surrounding the role of data is insufficient. A lack of digital talent and investment in STEM proficiencies further constrains capacity, with Indonesia not ranking highly globally at the non-tertiary level (ID-4; ID-5). Interviewee ID-5 cautions that "within Southeast Asia, there are only two countries that are above the global average—Vietnam and Singapore," and that "[Indonesia] needs to find the intersection between power and talent better to increase its ability to build generation capabilities and attract FDI capital for nurturing domestic AI development.

In terms of policy drivers, Indonesia's approach is shaped by a combination of factors. Participant ID-3 characterizes it as a "pragmatic attempt to balance innovation, safety, and geopolitical pressure," in addition to economic growth. Furthermore, interviewee ID-5 adds that when talking about AI, it is important to consider the entire value chain, as AI governance is tied to energy security and electrification: "Indonesia, like many other countries in the Global South, is electrified at around 1,300 kilowatt hours per capita, which is well below the necessary wattage - really at about 10,000 kilowatt hours per capita" - for any nation to embrace an AI narrative.

The question of digital sovereignty is a more contested theme. An interviewee from civil society (ID-1) notes that "the government has been ramping up its use of AI", including AI internet censorship tools, like Kominfo's Cyber Drone 9, while stressing that they "do not know what kind of AI systems are being deployed." She also flags that "Indonesian regulations are very scattered" and that corporate capture

by US and Chinese multinational tech companies is a big concern - a double-edged sword since “existing regulations that help establish national sovereignty are also used as a means to control information flow.” Notably, the findings on (digital) sovereignty diverged between correspondents: Participant ID-4 lists digital sovereignty and reduced independence from multinational companies like Google, Amazon, and Meta as the second most important national priority, while Mr. Yunkins (ID-3) notes that a drive toward asserting nationalism, sovereignty, and independence by protecting people’s data and their privacy has been intensified post-COVID. Conversely, another interviewee highlights that Indonesian data primarily resides abroad, complicating any meaningful assertion of data sovereignty (ID-5).

Regionally, interviewees describe ASEAN engagement as largely symbolic, with the forum more defined by competition for foreign direct investment than cooperation and national priorities superseding regional ones (ID-2, ID-5). Nonetheless, one interviewee highlights that “there is a shared sentiment of cross-border data transfer in developing [their] digital economies” and need to attain a higher degree of interoperability (ID-1; ID-3). Indonesia tends to borrow approaches pragmatically from the OECD and the EU especially when it comes to the regulation of AI risks (ID-2; ID-1; ID-3). Participant ID-5 attributes this partly to low intra-regional trade, saying “if there is a greater degree of communication, there is a greater degree of storytelling with each other,” and notes that Indonesia, like the EU, has not been a beneficiary of the IoT in the way the US has, and therefore prioritizes the democratization of information.

On the question of a 'Third Way,' there is consensus that Indonesia does not pursue one and is constrained from doing so, with domestic AI companies outcompeted by mainly US, EU, and Chinese tech firms (ID-1). Looking ahead, interviewees suggest Indonesia should draw more from India — given comparable literacy levels, development trajectories, and youth demographics—rather than Singapore, which, as interviewee ID-5 notes, is a desirable AI development model on paper but “geopolitically more predisposed to the West than it is to China.”

Singapore - Interview Findings

Ang, Rahman, and the three anonymous interviewees (SG-6; SG-7; SG-8) collectively reveal how Singapore formulates its AI agenda. Together, they illustrate the capacity that implements the agenda, the forces that drive policy choices, and the nation’s efforts to balance external dependence and strategic autonomy.

All interviewees agree that Singapore prioritizes economic competitiveness, digital transformation, and public-sector modernization. Ang (SG-9) states that “Singapore’s AI agenda is driven by economic

competitiveness and the desire to accelerate digital transformation”. Interview participant [SG-7](#) echoes this, noting the focus on “economic competitiveness, digital transformation, and public-sector modernization.” Respondent [SG-6](#) adds that the latest National AI Strategy targets key sectors such as connectivity, logistics, healthcare, and advanced manufacturing. However, it is further noted that ethical concerns are emerging in Ang’s statement that “bias, misinformation, and explainability are now rising drivers” ([SG-9](#)).

In respect of governance capacity, Rahman ([SG-10](#)) links his responses to the country’s existing policy outlined in its document corpus stating that “AI governance in Singapore builds on the country’s Smart Nation vision, aiming to ensure safe and secure AI use, protect jobs, and tech-industry interests, and develop capacity to manage emerging AI risks.” Interviewee [SG-9](#) provides the view that “cross-government coordination is often hampered by fragmented regulatory structures across ministries,” and that “many governance issues are fundamentally engineering problems.” Interviewee [SG-6](#) highlights physical constraints such as limited land, water, and energy to build and operate data centers, and states that “attracting and retaining top-tier AI talent presents a substantial hurdle.” Moreover, interviewee [SG-8](#) echoes the engineering/law divide, observing that “bridging the gap between legal and technical practitioners is a significant challenge, because AI governance issues are often rooted in engineering problems.”

For Singapore, the dominant policy driver in respect of its governance approach is its desire to remain attractive to foreign AI investors. Participant [SG-6](#) explains that “AI governance is principally framed around maintaining attractiveness and trust for major foreign players”, while also managing domestic externalities such as disinformation. Ethical considerations are gaining traction as Ang ([SG-9](#)) notes a “rising focus on bias, misinformation, and explainability.”

The interviews also inquired into the theme of sovereignty and dependence and how the interviewees perceived Singapore’s positionality in that respect. The general consensus is that Singapore remains heavily reliant on foreign cloud and semiconductor supply chains. Participant [SG-7](#) observes that “most ASEAN members, including Singapore, depend on foreign cloud and semiconductor infrastructure.” Rahman ([SG-10](#)) states that “[...] sovereign AI is a national goal,” and that “several agencies are developing sovereign AI cloud capabilities for strategic sectors such as security and defense.” Respondent [SG-6](#) downplays a sovereign-data narrative, stating that “digital sovereignty is not a primary framing; interoperability is preferred.” Interviewee [SG-8](#) adds that sovereignty is treated pragmatically, stating that “sensitive data requires sovereign storage, while less-sensitive data can be handled more flexibly.” To

mitigate strategic risk, the government is developing “sovereign AI” capabilities for important security-related sectors.

Across the five interviews, Singapore’s pragmatic approach to AI governance prioritizes economic competitiveness, while embedding ethical safeguards. However, fragmented institutions, talent shortages, and physical limits constrain governance, prompting a reliance on soft-law guidelines in pursuit of flexibility. All respondents indicate that business attractiveness and strategic geopolitical balancing primarily drive policy, but ethics seems to be gaining traction. Further, interviewees noted Singapore’s dependence on foreign infrastructure, but they also pointed out that the country is cultivating sovereign AI capacity for critical functions. The interviews reveal a narrative thread that appears to favor interoperability over strict data localization, whereby a blend of ambition, pragmatism, and cautious autonomy defines its current AI trajectory. In short, the interviews helped to illuminate the realities of the AI governance landscape in Singapore as an extremely complex, multi-layered realm, with a host of moving parts simultaneously affecting one another.

India - Interview Findings

The interviews on India’s AI landscape reveal a strategic environment where innovation has been prioritized over regulatory concerns, at least in the short term. AI is being portrayed as the fulcrum of national competence and economic growth in the context of a developing country. Interviewees suggest that this has led to a scenario of “innovation before governance (IN-16).” As Mrs. Rugmini Devi (IN-18) noted, “Whenever we are talking about AI, we are essentially talking about innovation and competitiveness.” This growth-oriented framing positions India’s AI strategy as a driver of industrialization, often placing governance-related issues on the backburner.

However, this focus on innovation lies alongside a nascent (underdeveloped) governance capacity. India’s lack of a central nodal regulator constrains its ability to create a cohesive AI governance framework. Mr. Rai (IN-19) and Mrs. Devi (IN-18) point out the absence of nodal regulators most prominently. With Rai saying that “there is no single ministry” and “no unified AI regulator” and Rugmini underlining “the absence of a binding legislative framework.” This is further exacerbated by gaps in technical proficiency among public sector workers. Various interviewees classify this challenge in different ways but they all point to limited AI awareness and gaps in the foundations of digital governance. Interviewees IN-18 and IN-17 emphasize this most prominently, with Sadhana stating that “foundations of digital governance has

gaps” while participant IN-18 emphasizes the notion that “there are so many policy document [...] but, we see that implementation is at a nascent stage.” Here, Vaishu Rai (IN-19) also highlights “the limited public sector AI talent awareness,” as a gap in the ability of the state to understand and regulate AI.

The primary policy drivers behind India’s AI push are a desire for independence from global superpowers’ influence and a need to boost its economy. This is reinforced by the China factor, which appears inevitable in policy discussions. The overall strategy is motivated by a Fear of Missing Out (FoMo) in the global race for AI dominance. India ultimately desires to develop its own capacities rather than depend on external powers.

India views sovereignty through a distinctly developmental lens. Mr. Sharma (IN-16) emphasizes that true sovereignty cannot be achieved without domestic access and control over essential hardware such as GPUs and chips. Further, he (IN-16) observes that “there is no sovereignty [...] until you have the right to have GPUs and chips.” This is a pragmatic realization among experts that true sovereignty is impossible without access to critical hardware. Dr. Patil (IN-20) also notes that reducing dependence on western and Chinese hardware needs to be made a focal point if a genuine third way is to be developed. Rather than adopting a closed-door mindset, India’s mindset is about securing the material and developmental rights necessary to thrive in a global digital economy.

Overall, India’s AI strategy reveals a push for rapid innovation that outpaces its regulatory framework. While the developmental mindset drives ambitious growth targets, it also exposes institutional and capacity concerns. Ultimately, India is performing a delicate balancing act: accelerating AI adoption to assert technological sovereignty while gradually resolving governance gaps in a context shaped by geopolitical realities.

Brazil - Interview Findings

The interview findings suggest that Brazil’s AI governance is shaped by a combination of economic ambitions and normative commitments. Respondents consistently emphasise the role of AI in supporting economic development. Mr. Zanatta (BR-15), for example, highlights Brazil’s “potential of doing a strong service-based AI economy,” while Technology Ambassador Eugênio Garcia (BR-14) describes AI as “a unique strategic opportunity [...] to accelerate economic [...] development”. At the same time, there is a clear commitment to right-based governance, reflected in references to a “rights-based approach [...] connected with privacy rights, data protection [...] and explainability” (BR-15).

However, this dual orientation is accompanied by persistent challenges in governance capacity. Interviewees point to structural constraints, including limited domestic technological capabilities and dependence on foreign infrastructure. As Mr. Zanatta (BR-15) notes, “Brazil does not have big AI companies,” while Mr. Garcia (BR-14) refers to a “widening gap in computational power [...] between the North and South.” Institutional and legislative delays further complicate implementation, with the AI bill described as still pending and “[having] released an initial report” (BR-11).

There are multiple policy drivers in this context which sometimes overlap with each other. While innovation and competitiveness remain central - “innovation and competitiveness function as core objectives” (BR-14) - rights-based concerns are also strongly present, with interviewee BR-15 emphasizing that “we defend AI governance models with rights.” At the same time, geopolitical considerations are becoming more prominent, with Mr. Garcia (BR-14) noting that AI governance is “primarily driven by geopolitical considerations and techno-economic competition.”

Questions of sovereignty and dependence cut across these themes. Although digital sovereignty is prominent in policy discourse, described as a “concept increasingly used in official documents” (BR-12), its practical meaning remains unclear. As Mr. Zanatta (BR-15) observes, “it’s not very clear what that means in practice,” particularly given the continued reliance on foreign platforms (BR-13).

At the regional level, interviewees suggest that organizations like BRICS currently play a limited role in shaping national AI governance. Regional cooperation is often described as “emergent” (BR-15), with national priorities taking precedence. As one respondent puts it, “the national approach is more important” and that they “don’t think there’s much regional influence” (BR-11).

Overall, Brazil’s approach can be understood as occupying a position between dominant global models. While some interviewees acknowledge that Brazil “falls very much in between the US and the EU” (BR-11), there is little evidence of a clearly defined ‘Third Way’ model. Structural constraints, particularly technological dependence, make it “very hard to imagine [...] something wholly original” (BR-11), suggesting that any emerging approach remains shaped by external pressures as much as domestic priorities.

DISCUSSION

The findings of this study support the broader shift in the literature away from understanding AI governance purely as a technical or regulatory matter, and toward seeing it as a deeply political issue shaped by questions of sovereignty, economic competition, and the uneven ability of states to govern emerging technologies effectively. Across all four country cases, policy documents consistently present AI as a strategic national resource connected to long-term development goals and geopolitical positioning. However, the interview findings complicate these official narratives by highlighting the practical difficulties governments face when attempting to translate ambition into implementation. Interviewees repeatedly pointed to institutional fragmentation, reliance on foreign technological infrastructure, shortages in technical expertise, and uncertainty surrounding how proposed governance frameworks will function in practice once formally introduced.

The central pattern emerging from the analysis is therefore not simply the existence of different national approaches to AI governance, but a recurring tension between political ambition and the actual institutional and material capacity needed to realize those ambitions. While each country presents its own priorities, governance style, and even strategic objectives, all four cases remain shaped to varying degrees by reliance on external technological ecosystems and uneven levels of institutional development. This tension becomes especially visible when comparing the strong sovereignty-oriented language found in policy documents with the implementation challenges described by the interviewees. Across several of the cases, governments articulated ambitions centered on technological autonomy and digital sovereignty, while interviewees simultaneously pointed to continued dependence on foreign cloud infrastructure, semiconductor supply chains, external investment, and internationally developed governance frameworks.

These dynamics also explain why AI governance across ASEAN and BRICS remains primarily shaped at the national level and only selectively aligned with regional or international frameworks. Rather than moving toward clearly defined regional governance models, the findings suggest that states engage with external approaches in a pragmatic and highly selective manner, often borrowing elements that fit domestic priorities while maintaining control over the broader direction of governance. In practice, regional organizations and international frameworks appear to function more as reference points or platforms for coordination than as institutions capable of strongly shaping national policy trajectories.

The discussion below therefore examines how techno-nationalism, regional alignment, and the possibility of a “Third Way” approach to AI governance emerge across the four country cases. In doing so, it explores whether these governance trajectories represent genuinely distinct alternatives to dominant

global models, or whether they continue to be shaped by external dependence and limitations in governance capacity within an increasingly fragmented global AI governance landscape.

Techno-Nationalism as a Driver of National AI Governance

Techno-nationalism appears across all four cases as an important force shaping national approaches to AI governance, although the extent to which these ambitions can be operationalized varies considerably between countries. In the policy documents, AI is repeatedly connected to broader national objectives and framed as part of a larger effort to strengthen economic standing and technological influence. This reflects the arguments advanced by Reich, Levi-Faur and Montresor, who describe technological capability as increasingly tied to state influence and strategic autonomy. Across the cases examined here, AI governance is, therefore, framed not only around regulation, but mainly around how states seek to position themselves within an increasingly competitive geopolitical environment driven by technological competition.

Singapore represents the clearest example of a comparatively capacity-backed form of techno-nationalism. Policy frameworks such as Smart Nation 2.0 and the National AI Strategy 2.0 position AI as central to Singapore's efforts to maintain its economic position and further integrate digital technologies into public administration. Documents like the Model AI Governance Framework and AI Verify also point to a relatively developed governance architecture built around flexibility and trusted innovation. The interview findings largely reinforce this direction. Several respondents identified competitiveness and digital transformation as the main drivers behind Singapore's AI agenda (SG-6; SG-7; SG-9), while also highlighting the government's comparatively strong ability to mobilize infrastructure and investment in support of AI development. However, the interviews reveal that this model is not without limitations. Respondents pointed to physical constraints linked to limited resources required for the establishment for data centres, such as land, water, and energy, and in addition difficulties surrounding AI talent retention (SG-6). Others highlighted coordination challenges across ministries and the gap between technical and legal expertise in governance processes (SG-8; SG-9). As a result even the most institutionally developed case within the sample remains shaped by practical constraints and continued dependence on external technological infrastructure.

India similarly frames AI as a strategic tool for national advancement, although its governance approach reflects a more explicitly developmental orientation. Policy documents such as the National Strategy for Artificial Intelligence and the IndiaAI Mission present AI as central to industrial expansion and the strengthening of digital public infrastructure. In doing so, they reflect the techno-nationalist

argument that technological development is increasingly tied to national influence and sovereignty. At the same time, the interviews suggest that India's governance trajectory is still marked by major institutional gaps. One respondent described the current approach as "innovation before governance" (IN-16), while several interviewees pointed to the absence of a unified regulator, weak coordination across institutions, and limited technical expertise within parts of the public sector (IN-18; IN-19). Questions of sovereignty were also repeatedly linked to access to critical infrastructure, particularly semiconductors and GPUs. As Sharma (IN-16) argued, "there is no sovereignty [...] until you have the right to have GPUs and chips". These findings suggest that although India strongly promotes technological self-reliance in policy discourse, its broader ambitions remain constrained by continued dependence on external infrastructure and supply chains.

Indonesia presents perhaps the clearest example of the gap between techno-nationalist ambition and governance capacity. Across policy documents, AI is embedded within the broader vision of Golden Indonesia 2045, where it is framed as an important driver of economic transformation and national advancement. Documents like the Stranas AI roadmap and AI Roadmap *Buku Putih - Peta Jalan Kecerdasan Artificial*, place AI at the center of long-term national planning, while also emphasizing institutional development and greater technological independence. Notably, the interview findings reveal major implementation difficulties beneath these ambitions. Respondents repeatedly pointed to fragmented authority structures, weak coordination across agencies, shortages in technical expertise, and insufficient digital infrastructure (ID-2; ID-3; ID-5). Several interviewees also highlighted that Indonesia's continues to depend on foreign technology companies and draw from external governance frameworks, particularly those associated with the OECD and the European Union. Rather than reflecting a fully developed governance model, the findings suggest that many of Indonesia's AI ambitions remain aspirational and are still heavily shaped by institutional limitations and external dependence.

Brazil occupies a somewhat different position, combining techno-nationalist ambitions with a strong rights-based governance discourse. It is the most explicit rights-development hybrid approach among the four cases, combining constitutional rights commitments, risk-based regulation, sustainability, and sovereignty rhetoric. Policy documents consistently connect AI to sovereignty and national development, while also grounding governance in constitutional protections, privacy rights, and ethical safeguards. Documents like PL 2338/2023 and the LGPD, therefore, frame AI governance not only as a question of innovation, but also one tied to human dignity and legal accountability.¹²⁹ A consistent policy driver across

¹²⁹ Senado Federal, *Projeto de Lei N° 2338/2023*, 21.

the document corpus is the aspiration to govern AI in ways that are participatory and non-extractive, resisting the reproduction of colonial dependency relations through digital infrastructure and technological ownership that include indigenous communities.¹³⁰ This reflects an attempt to balance developmental ambitions with normative commitments.

However, the interviews raised significant doubts about Brazil's ability to translate these ambitions into practice. Respondents repeatedly pointed to dependence on foreign technological infrastructure and the limited presence of large domestic AI firms. Zanatta (BR-15), for example, noted that "Brazil does not have big AI companies," while Gracia (BR-14) referred to the widening gap in computational capacity between the so-called Global North and South. Other interviewees also questioned the practical meaning of digital sovereignty itself. One respondent described sovereignty as a concept increasingly present in official discourse but still lacking clear operational meanings (BR-12), while another argued that continued reliance on foreign platforms makes it difficult to imagine a genuinely autonomous governance model (BR-11). Concerns surrounding legislative delays linked to the AI bill further reinforced perceptions of uneven implementation capacity. As in other cases, the interviews complicate the coherence projected in official strategies by exposing the structural constraints shaping governance in practice.

Taken together, the findings suggest that techno-nationalism functions not only as a driver of policy, but also as a way for states to communicate ambition and strategic intent. Across all four cases, governments portray AI as essential to their future economic position and broader role within the global technological order. However, the interviews consistently reveal the practical difficulties beneath these ambitions, including institutional fragmentation, dependence on foreign infrastructure, and delays in implementation. In this respect, the findings closely reflect Fatima et al.'s (2025) argument that national AI strategies often communicate political aspirations more clearly than they demonstrate fully developed governance capacity.

Regional Alignment in AI Governance

The limited influence of regional frameworks on national AI governance can be understood through the lens of a fragmented regime complex, which conceptualizes governance as emerging across overlapping institutional arrangements lacking central authority or enforcement capacity.¹³¹ Within such a structure, regional organizations do not operate as hierarchical coordinators but rather as one of many sites through

¹³⁰ Kavanagh, "Pluralistic AI Governance: Indigenous Knowledge."

¹³¹ Tallberg et al., "The Global Governance of Artificial Intelligence."; Raymond and DeNardis, Multistakeholderism: Anatomy of an Inchoate Global Institution."

which norms are articulated and negotiated. This theoretical perspective suggests that regional alignment is unlikely to exert a decisive influence on domestic governance trajectories, particularly in contexts where states prioritize strategic positioning and retain control over policy design. The findings of this study align with this expectation, indicating that regional frameworks play a secondary role relative to national priorities across all four country cases.

In the ASEAN context, the organization's consensus-driven and non-interventionist approach limits its capacity to shape national AI governance in a substantive way.¹³² Although both Singapore and Indonesia engage with ASEAN-level initiatives, their policy frameworks remain primarily nationally oriented. Singapore's approach illustrates this dynamic clearly. While it participates in regional discussions, its governance model is anchored in maintaining interoperability with the global system and sustaining its attractiveness within international innovation works. Regional engagement is therefore instrumental rather than constitutive of its governance architecture. Interview data reinforces this interpretation, with respondents noting that AI governance is primarily oriented towards “maintaining attractiveness and trust for major foreign players” (SG-6), highlighting the primacy of global integration over regional coordination. This supports Veale et al.'s argument that cooperation in AI governance is often driven by strategic considerations rather than normative convergence.¹³³ Indonesia presents a similar pattern, though shaped by different constraints. Its policy documents reference ASEAN principles alongside OECD and EU-inspired frameworks, suggesting openness to multiple sources of influence. However, interview evidence indicates that regional cooperation remains largely symbolic, where national priorities supersede regional ones (ID-2; ID-5). Instead, governance is more directly shaped by domestic capacity constraints and competition for external investment. In this sense, ASEAN functions less as a driver of governance and more as a platform through which states signal alignment without ceding regulatory autonomy.

A comparable dynamic can be observed within BRICS, despite its different institutional logic. Although BRICS discourse emphasises cooperation and strategic autonomy, there is limited evidence that it produces a coherent or operational AI governance framework.¹³⁴ Brazil's policy documents invoke Global South collaboration and sovereignty, however interviews describe regional coordination as “emergent” and lacking concrete influence on domestic policy (BR-15; BR-11). India's position further reinforces this pattern. Its governance approach is primarily shaped by domestic priorities, particularly the development of digital public infrastructure and the pursuit of technological self-reliance. Interview evidence underscores

¹³² Putra, “Governing AI in Southeast Asia”

¹³³ Veale et al., “AI and Global Governance: Modalities, Rationales, Tensions.”

¹³⁴ Belli, “Exploring the Key AI Sovereignty Enablers (KASE) of Brazil, toward an AI Sovereignty Stack”

this focus, highlighting competitiveness pressures and the need for control over critical infrastructure (IN-16; IN-18). Engagement with BRICS does not appear to structure its governance model in a meaningful way. Instead, regional affiliation serves more as a geopolitical reference point than as a source of regulatory direction.¹³⁵

Taken together, these findings suggest that regional organizations across both ASEAN and BRICS function as arenas of positioning rather than as determinants of governance outcomes. This reinforces broader claims in the literature that AI governance operates within a decentralized and uneven global system, where influence is distributed across multiple actors without clear coordination.¹³⁶ It also reflects the persistence of techno-nationalist dynamics, in which states prioritize strategic autonomy while remaining embedded in global technological networks.¹³⁷ For so-called Global South actors in particular, this creates a situation in which participation in regional frameworks coexists with continued dependence on external infrastructures and standards.¹³⁸ As a result, regional alignment remains limited in its practical impact, with national governance trajectories shaped primarily by domestic capacity and structural constraints rather than by regional institutional frameworks.

Sovereignty and the “Third Way” Question

Across all four cases, the findings do not support the existence of a coherent ‘Third Way’ approach. Instead, they show hybrid and context-specific adaptations that are driven by ambition-capacity gaps. Therefore, each country selectively borrows from the suite of other frameworks available to them, adapts them to national priorities, and articulates sovereignty ambitions that often outpace the institutional and material capacity to realise them (SG-9: “I think to call it a third way is maybe an overstatement of the natural progression. Singapore cannot follow a totally US model, nor a totally EU model.”). The ‘Third Way’ is not found to be a working governance model that is either chosen or rejected, it acts more as a condition they navigate under unequal structural constraints.

¹³⁵ Saba, “Artificial intelligence (AI)-poverty-economic growth nexus in selected BRICS-Plus countries: Does the moderating role of governance matter?”

¹³⁶ Veale et al., “AI and Global Governance: Modalities, Rationales, Tensions”; Tallberg et al., “The Global Governance of Artificial Intelligence.”

¹³⁷ Reich, “The Rise of Techno-Nationalism”; Montresor, “Techno-globalism, Techno-nationalism and Technological Systems.”

¹³⁸ Fatima et al., “National Strategic Artificial Intelligence Plans.”; Belli, “Exploring the Key AI Sovereignty Enablers (KASE) of Brazil, toward an AI Sovereignty Stack.”

All four draw heavily on existing external models — the EU's rights-based approach, the US market-led logic, and the Chinese state-directed model, while adapting them to local development priorities and political contexts. This pattern of selective adaptation rather than passive adoption or independent origination is consistent across cases regardless of institutional capacity. One Indonesian interviewee acknowledges this by stating that, “our approach still tends to borrow elements from existing global models rather than creating a truly distinctive framework. Part of the challenge is structural, because the Indonesian digital ecosystem relies heavily on global technology companies” (ID-12). Here, a Brazilian interviewee views the same dynamic from a different angle: “Brazil falls very much in between US and EU” (BR-11), while another was mainly skeptical: “I see very limited evidence of a 'third way' in Brazil in practice today” (BR-13). This tension between normative ambition and structural lack of capacities recurs in different forms across all four cases, despite Singapore being the closest to a coherent hybrid model because it combines soft-law governance, state coordination, innovation via experimentation, and trust-based regulation.

Sovereignty language is strong in official documents and conspicuously weak in legislative output. National AI strategies, regional declarations, and ministerial speeches invoke digital sovereignty routinely, yet binding mechanisms are far rarer. This gap between ambition and actual regulation and implementation is not a feature of one or two outlier cases; it recurs systematically, which suggests it reflects something structural rather than a failure of political will in any particular context. In Brazil, where civil society has been the most active in pushing a rights-based framing, one interviewee saw little concrete result: “I don't see how it translates to legislation” (BR-15). Another put the dependency problem directly: “digital sovereignty is discussed at the normative level, but the country remains highly dependent on foreign platforms” (BR-13). In Indonesia's case, sovereignty discourse was characterized by one interviewee as “still largely rhetorical” (ID-12), and Singapore, despite the most coherent institutional architecture, frames sovereignty pragmatically as interoperability rather than autonomy (SG-12). The gap between rhetoric and implementation is not incidental. Meaningful regulatory autonomy requires domestic infrastructure control that none of these states possesses to the same degree as the model-shaping powers of the US, EU, or China. Sovereignty can be declared in policy documents, but it cannot be legislated into existence without the underlying technical and institutional foundations to back it up.

Underlying both patterns is a shared material constraint that sets a structural floor beneath which governance ambitions cannot reach. AI sovereignty, whether framed in terms of data localization, model development, or regulatory independence from external platform providers, requires domestic compute and energy capacity, reliable digital infrastructure, and sufficient capacity. One interviewee stated “there is

no sovereignty, or even a discussion of sovereignty, until you have the right GPUs or chips” (IN-14). The same constraint appears in different forms across cases. For instance, in Indonesia as reliance on foreign cloud providers (mainly US) and limited STEM talent; in Brazil as the absence of national AI champions and dependence on foreign platforms that one interviewee described as making “something wholly original very hard to imagine” (BR-15), and in Singapore as the physical constraints of a small state where land, energy, and talent scarcity limit the reach of even the most institutionally capable governance model. These material constraints that by default dependency structures with foreign AI champions, is what prevents ambition-capacity gaps from closing through the design of meaningful governance structures alone.

Ultimately, rather than revealing a unified Global South ‘Third Way’, the findings show that Brazil, India, Indonesia, and Singapore are experimenting with hybrid AI governance under unequal considerations but no concrete pursuit of an alternative path. It is structurally deferred. Each country expresses genuine agency: Brazil through a rights-based and participatory governance framing, India through a development-sovereignty model, Indonesia through adaptive alignment with international frameworks from the EU and the OECD; and Singapore through pragmatic hybrid architecture and regional norm-shaping. Yet this agency operates within constraints imposed by the limitations discussed above. Rather than converging on a common alternative model, these cases demonstrate what managed interdependence looks like in practice: a field of constrained strategies shaped by national ambition, structural dependency, and geopolitical balancing.

CONCLUSION

This study has asked how national AI policies within the chosen ASEAN and BRICS countries are shaping AI governance amid rising techno-nationalism.

The findings show that Brazil, India, Indonesia, and Singapore are not converging around a unified ASEAN or BRICS model of AI governance. Instead, each country is developing a nationally specific approach shaped by its own development priorities, institutional capacity, and position within the global technological order. AI is consistently framed as central to national advancement, but the ability to translate that ambition into effective governance varies considerably across the cases.

At the comparative level, the study finds that techno-nationalism is a significant driver of AI governance, but not in a uniform way. Singapore demonstrates the most institutionally developed model, using flexible governance tools and public-sector capacity to support trusted innovation. India frames AI through development and technological self-reliance, while still facing gaps in regulatory coordination.

Indonesia shows a particularly clear tension between long-term AI ambition and limited implementation capacity. Brazil combines sovereignty-oriented policy language with a rights-based governance approach but remains constrained by dependence on foreign platforms and uncertainty over how digital sovereignty can be made operational.

The findings also show that regional organizations play a limited role in shaping national AI governance. ASEAN and BRICS provide platforms for dialogue and geopolitical positioning, but they do not currently produce binding or coherent governance models. National priorities continue to drive policy choices more strongly than regional frameworks. This reinforces the broader literature on fragmented AI governance, where states engage selectively with external models while retaining domestic control over policy direction.

Finally, the study finds limited evidence of a fully realized “Third Way” in AI governance. The four cases do demonstrate hybrid approaches, but these are better understood as forms of constrained experimentation than as coherent alternatives to US, EU, or Chinese models. The key finding is therefore not that a new model has emerged, but that these states are navigating AI governance through managed interdependence. They express agency and pursue greater autonomy; however, their strategies remain shaped by infrastructure dependence and uneven governance capacity.

Overall, AI governance in these contexts is defined by the attempt to pursue national development and sovereignty under conditions that limit full autonomy. This study contributes to debates on technonationalism and digital sovereignty by suggesting that Global South states are not passive adopters of external frameworks. However, their ability to build genuinely distinct AI governance pathways depends not only on policy ambition, but also on the material and institutional capacity needed to make those ambitions effective.

Future Outlook

Building on the present analysis, future research can extend this report’s comparative framework by engaging more directly with alternative governance paradigms that move beyond US, EU and Chinese models. One promising avenue lies in further exploring what has been described as a ‘third way’ approach to AI governance, grounded not only in balancing innovation and regulation, but in embedding principles of human rights and community-led governance into the design and use of AI systems. This includes examining how such approaches can be operationalized across different institutional and cultural contexts, rather than remaining at the level of normative aspiration.

In this area, Indigenous data governance frameworks, like the First Nations' OCAP principles (Ownership, Control, Access, Possession) within Canada, offer a particularly valuable point of comparison.¹³⁹ These models foreground collective rights and community control, and may provide important insights into how governance can address structural inequalities and ensure that AI systems are aligned with the values of affected communities without generating bias, especially in contexts where questions of inclusion and representation are central.

At the same time, future work could deepen the analysis of how engineering and technical infrastructure shapes and is shaped by AI governance. As highlighted in the interviews, engineering choices, from data storage to generation capacity, are not neutral, but actively shape regulatory possibilities and constraints. A more integrated approach that connects technical design with governance frameworks would allow for a better understanding of how policy objectives are translated and limited in practice.

Overall, these directions would not expand the scope of the project but rather deepen its analytical contribution by linking normative frameworks with institutional arrangements and technical realities in a more integrated way.

¹³⁹ First Nations Information Governance Centre. (2019). *The First Nations Principles of OCAP® [brochure]*. Ottawa: FNIGC.

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APPENDICES

Appendix 1. Interviewed Participants

Country	Interviewee Reference	Interviewee Name / Description	Affiliation and Expertise
Indonesia	Participant ID-1	Anonymous	Project Coordinator for an Indonesian civil society organization advocating for digital rights.
	Participant ID-2	Tuhu Nugraha Dewanto	He worked for Indonesia's Applied Digital Economy & Regulatory Network (IADERN) and advises policymakers, regulators, and senior executives on designing human-centered AI governance and managing systemic risk.
	Participant ID-3	Henke Yunkins	He is the Director of Regulation and Ethics at the Indonesia AI Society (IAIS) and CEO of Phire Studio, a digital solutions company (key private-sector voice on AI governance and ethics in Indonesia).
	Participant ID-4	Dewa Ayu Diah Angendari	She is a PhD candidate at Leiden University (and former lecturer at Gadjah Mada University, Department of Communication Science) whose research focuses on how power, interests, and policy imaginaries shape Indonesia's AI governance.
	Participant ID-5	Gita Warjawan	Gita Wirjawan is a former Indonesian Minister of Trade and chairman of the Investment Coordinating Board, now a nonresident scholar at the Carnegie Endowment for International Peace and visiting scholar at Stanford, who engages with AI through the lens of Indonesia's economic competitiveness, education, and Southeast Asia's strategic positioning
Singapore	Participant SG-6	Anonymous	S Rajaratnam School of International Studies

	Participant SG-7	Anonymous	A private sector development specialist with decades of experience in industrial and technological development across Asia, serving as Board Chair and Vice President of a nonprofit focused on responsible AI adoption across the Asia-Pacific, with expertise spanning workforce transformation, economic development, and AI governance frameworks.
	Participant SG-8	Anonymous	A senior government official leading national-level digital transformation and smart city initiatives in a Southeast Asian city-state, overseeing the integration of technology across transport, urban living, and public services.
	Participant SG-9	Benjamin Ang	A lawyer by profession called to the Singapore Bar, he is now head of the Centre of Excellence for National Security, an independent policy research think tank. He is involved in joint UN-Singapore initiatives in the areas of cyber security and diplomacy and information and communication technologies.
	Participant SG-10	Muhammad Faizal Bin Abdul Rahman	Research fellow at the Institute of Defense and Strategic Studies in the S.Rajaratnam School of International Studies, Singapore.
Brazil	Participant BR-11	Anonymous	Head of Research at a Center that works on AI Strategy & Regulation
	Participant BR-12	Atahualpa Blanchet	Institute of Advanced Studies of University of São Paulo (IEA-USP)
	Participant BR-13	Iara Franco Schiavi	Pontificia Universidade Católica do Paraná (PUCPR)
	Participant BR-14	Eugenio Garcia	Government official in the role of the Tech Ambassador, MFA Brazil

	Participant BR-15	Rafael A. F. Zanatta	Co-director of Data Privacy Brasil and postdoctoral researcher at the University of São Paulo, a leading civil society voice on AI regulation and data rights in Brazil who assisted drafting Brazil's General Data Protection Law.
India	Participant IN-16	Arun Sharma	Senior Digital & AI Specialist at the World Bank
	Participant IN-17	Sadhana Sanjay	Lead – Research and Policy Engagement, IT for Change (special consultative body with UN ECOSOC)
	Participant IN-18	Rugmini Devi M	Fellow, Science Policy Institute Guest Faculty, Department of Political Science, University of Kerala
	Participant IN-19	Vaishu Rai	India's World Magazine - Editorial Associate (Special Projects)
	Participant IN-20	Sameer Patil	Director of the Centre for Security, Strategy and Technology at the Observer Research Foundation (ORF) in Mumbai

Appendix 2. Interview Questions

NATIONAL PRIORITIES

- How would you describe your country's current priorities in AI governance? What problems is AI governance mainly trying to address (e.g., economic competitiveness, public sector efficiency etc.)?

GOVERNANCE CAPACITY

- What are the main challenges your country faces in translating AI strategies into effective governance?

DRIVERS OF POLICY

- In your view, what most strongly drives AI governance choices today: innovation and competitiveness, ethical and rights-based concerns, or geopolitical positioning?
 - Has this balance changed recently?

SOVEREIGNTY AND DEPENDENCE

- To what extent is AI governance in your country framed as an issue of digital sovereignty or strategic autonomy?

REGIONAL DIMENSION

- How do regional frameworks such as ASEAN/BRICS shape or interact with national AI governance in practice rather than on paper?

Or

- To what extent have ASEAN / BRICS coordinated a regional approach to AI governance?

Or

- In what way might your country's approach to AI governance differ to other approaches you are seeing in the region?

THE "THIRD WAY" TEST

There is a growing scholarship that argues that countries like yours may be developing an alternative approach to AI governance, distinct from EU-style regulation, US market-led models, and the Chinese state-centric approach?

- Do you see evidence of such a "Third Way" in practice, or is this mainly rhetorical?
- If it exists, what makes it distinct? If not, why is it difficult to sustain?

Appendix 3. Participant Information Sheet

IHEID APPLIED RESEARCH PROJECT (ARP35) –PARTICIPANT INFORMATION

Project Title:

AI Governance at a Cross-Roads in ASEAN and BRICS: A Road Toward Inclusivity Amid Techno-Nationalism

Institution:

Graduate Institute of International Development Studies (GGI) / Institut de Hautes Études Internationales et du Développement (IHEID)

<https://www.graduateinstitute.ch/>

Partner Institution/External Partner:

Blavatnik School of Government, University of Oxford

<https://www.bsg.ox.ac.uk/>

Purpose of the Study:

You are invited to participate in an academic research project examining how selected economies within ASEAN and BRICS are shaping national approaches to AI governance within the context of rising techno-nationalism, digital sovereignty, and global competition.

The study seeks to understand whether unique governance models are emerging beyond US, EU, and Chinese frameworks.

Why You Were Invited:

You were identified based on your academic, professional, or policy-related expertise in AI governance, digital policy, data governance, or related fields relevant to BRICS (Brazil or India) or ASEAN (Singapore or Indonesia). Your published work and/or professional role and experiences in the respective field(s) make your perspective particularly valuable to this research.

What Participation Involves:

Participation involves a semi-structured interview lasting approximately 30-45 minutes, conducted online (Zoom, Webex, Microsoft Teams, or other accessible platforms).

The interview will focus on:

- National and regional AI governance developments
- Sovereignty and techno-nationalism narratives
- Institutional capacity and regulatory practice
- Regional coordination on AI governance (e.g. BRICS / ASEAN)
- Opportunities and constraints for alternative governance models

With your permission, the interview will be audio-recorded for accuracy and later transcribed for academic analysis that will inform the final report.

Voluntary Participation and Right to Withdraw:

Participation is entirely voluntary.

You may:

- Decline to answer any question
- Withdraw from the study at any time before data analysis begins
- Request that your interview data be excluded without explanation

There are no consequences for non-participation or withdrawal.

Confidentiality and Data Use:

- Interview data will be used solely for academic purposes
- Data will be stored securely and accessed only by the research team
- You may choose whether you wish to be:
 - o Identified by name and affiliation
 - o Anonymised in all outputs

Outputs and Dissemination:

Findings will be used in:

- An academic Applied Research Project (ARP) report of 10,000 words (Master's level)
- A final presentation to the partner institution

No commercial use will be made of the data.

Contact Information:

If you have any questions about the study, please contact:

The 'AICrossroads' Team

arp2025.aicrossroads@graduateinstitute.ch

Thank you for considering participation in this study.

Appendix 4. Consent Form for Interviewees

IHEID APPLIED RESEARCH PROJECT (ARP35) – **CONSENT FORM**

Project Title:

AI Governance at a Cross-Roads in ASEAN and BRICS: A Road Toward Inclusivity Amid Techno-Nationalism

Research Team:

Alina Sophie Bernhardt, Tommaso Savelli, Jobin Lamothe, Pratik Bapat

Institution:

Graduate Institute of International Development Studies (GGI) / Institut de Hautes Études Internationales et du Développement (IHEID)

<https://www.graduateinstitute.ch/>

Partner Institution/External Partner:

Blavatnik School of Government, University of Oxford

<https://www.bsg.ox.ac.uk/>

Informed Consent and Participation:

Please read each statement and indicate your agreement.

- ☐ I confirm that I have read and understood the ‘Participant Information’ document.
- ☐ I understand that my participation is voluntary and that I may withdraw my participation and data at any time prior to analysis.
- ☐ I consent to participate in a semi-structured interview for this study.
- ☐ I consent to the interview being audio-recorded and transcribed.
- ☐ I understand that my data will be used solely for academic research purposes.
- ☐ I understand that the interview will be stored securely by the research team and accessed only by project members.

Attribution and Confidentiality Preference:

Please select *one*.

- ☐ I consent to being identified by name and affiliation in academic outputs.
- ☐ I prefer to remain anonymous in all publications and presentations.

Participant Name:

Affiliation:

Signature:

Date and Place:

Appendix 5. ARP35 INTERVIEW CODEBOOK

Main Category	Descriptions	Subcategory	Subcategory Description
National Priorities	How would you describe your country's current priorities in AI governance? What problems is AI governance mainly trying to address?	Economic Competitiveness and Innovation	Ensuring regulations remain relaxed enough not to stifle newer innovation approaches
		Ethical and rights-based concerns	Ensuring AI is utilised/operates in a framework that secures the rights of citizens
		Flexible governance instead of strict regulation / Balancing	Reliance on guidelines and best practices rather than strict laws. This approach helps avoid limiting innovation while still giving direction on responsible AI use.
Governance	What are the main challenges your country faces in translating AI strategies into effective governance?	Fragmented regulatory structure	AI governance responsibilities are dispersed across multiple levels of government, agencies, and ministries.
		Technical vs legal disciplinary gap	AI governance is hampered by a lack of interdisciplinary understanding and the deployment of ill-suited disciplinary perspectives, tools, and approaches.
		Deficits in infrastructure and capacity	Material and human capacity realities constrain governance ambitions. This means inadequate digital infrastructure that is costly, insufficient talent in the public sector, uneven connectivity, and limited computational resources
		Asymmetrical technology vs regulatory pacing	AI tech development far outpaces the capacity of formal regulatory processes

Main Category	Descriptions	Subcategory	Subcategory Description
Policy Drivers	In your view, what most strongly drives AI governance choices today: innovation and competitiveness, ethical and rights-based concerns, or geopolitical positioning? Has this balance changed recently?	Geopolitical Pressure and Strategic Positioning	Growing geopolitical rivalry shapes national AI decisions.
		Pragmatic Rights- and Rules-based Governance	AI Governance is context-sensitive rather than abstract and idealistic, reflecting a pragmatic orientation towards rights-based concerns.
		Innovation and Competitiveness	Establishing an ecosystem with AI policies that enable innovation-driven economic growth and cost-benefit thinking. It is very context-dependent.
		Civil Society and Rights-Advocacy Pressure	Civil society organisations are shaping AI governance by foregrounding rights, anti-discrimination, and human dignity concerns where economic interests prevail.
Sovereignty & Dependence	To what extent is AI governance in your country framed as an issue of digital sovereignty or strategic autonomy, particularly in relation to dependence on foreign technologies and platforms?	Data Sovereignty as a broader digital issue	Sovereignty concerns are not unique to AI. They are part of wider digital governance issues related to cloud computing, data storage, and infrastructure. Countries want control over how their citizen's data is stored and processed.
		Self-interested strategic autonomy	Countries want critical infrastructure such as data centres to be located within their territory and
		Rhetorical sovereignty vs. legislative translation	Observed gap between the declaratory emphasis on digital sovereignty in government discourse and the absence of binding legislative mechanisms. There is an underlying belief that sovereignty language in AI governance often serves performative or diplomatic functions rather than substantive policy-transformative ones.

Main Category	Descriptions	Subcategory	Subcategory Description
Regional Dimension	How do regional frameworks such as ASEAN / BRICS shape or interact with national AI governance in practice rather than only at the level of formal commitments? Would you say regional coordination meaningfully influences national policy choices, or do national approaches largely diverge within the region?	National priorities come before regional cooperation	Countries mostly focus first on their own national AI strategies before engaging with regional cooperation. Regional frameworks like ASEAN or BRICS tend to follow national priorities rather than strongly shaping them.
		Regional coordination is mostly symbolic	Regional cooperation around AI is largely symbolic. Countries participate in regional discussions and agreements, but these often do not strongly influence actual national policy decisions.
		Different national contexts lead to policy divergence	Countries in the same region have very different political systems, economies, and technical capacities. Thus, AI governance policies often diverge across countries, even within the same regional organisation.
		Regional efforts to create shared digital rules	Regional organisations are trying to create shared rules around digital policy and AI governance. These efforts are still developing and are not always binding.
Third Way	Some scholars argue that countries like yours may be developing an alternative approach to AI governance, distinct from EU-style regulation, US market-led models, and Chinese state-centric approaches? Do you see evidence of such a “Third Way” in practice, or is this mainly rhetorical? If it exists, what makes it distinct? If not, why is it difficult to sustain?	Pragmatic governance approach	The approach to AI governance is pragmatic. Instead of copying models from the US, EU, or China, governments choose policies that are better suited to their national context.
		Hybrid or mixed models	Countries are not following a Third Way in AI governance.
		Third Way as a political narrative	It is more of a narrative or political idea rather than a clearly defined governance model. Governments may use the concept to show independence from dominant powers.
		Structural constraints limit a true Third Way	Dependence on foreign technology companies and global AI infrastructure makes it difficult for countries to develop a completely independent AI governance model.

