

ARTIFICIAL INTELLIGENCE GOVERNANCE: THE U.S., EU AND CHINESE MODELS

* Zeynep Sıla ÇARDAKBAŞI



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Istanbul Bar Association
Information Technology Law Commission
Artificial Intelligence Working Group

INTRODUCTION

In the age of Artificial Intelligence (“AI”), technology has evolved beyond being merely an economic tool and has become a force that shapes the fundamental structures of human life through its social, legal, and ethical dimensions. This evolution affects not only innovation and production processes, but also directly influences the application of law, state policies, and the protection of individual rights. At this point, the concept of AI governance emerges.

AI governance is the management of processes within the framework of legal, ethical, and public policy principles. This governance is carried out through a system in which multiple actors—such as states, corporations, universities, and civil society—collaborate.¹

The primary objective of AI governance is to ensure that technological advancement is translated into social benefit, while preventing potential harms. In this regard, three main pillars emerge:

1. **Legal and Regulatory Pillar:** This pillar ensures that AI systems comply with applicable legal frameworks in areas such as data processing, algorithmic transparency, accountability and security. For instance, in the European Union (“EU”), the EU General Data Protection Regulation (“**GDPR**”)² and the Artificial Intelligence Act (“**AI Act**”)³ aim to protect individual rights and data privacy in the use of AI.
2. **Ethical and Normative Pillar:** This pillar ensures that AI operates in accordance with ethical principles such as justice, the prevention of discrimination, respect for human dignity and the promotion of social benefit in decision-making processes. A key element in this regard is to ensure that algorithms function in an unbiased and transparent manner.
3. **Political and Strategic Pillar:** AI is not only a technical tool; but also a mechanism of economic power, national security, and social control. Therefore, governance requires

¹ Anu Bradford, *Digital Empires: The Global Battle to Regulate Technology*, Columbia Law School, 2023.

² Regulation (EU) 2016/679 of the European Parliament and of the Council, General Data Protection Regulation, <https://eur-lex.europa.eu/el/reg/2016/679/oj/eng>, Accessed on October 30th, 2025.

³ Regulation (EU) 2024/1689 of the European Parliament and of the Council, Artificial Intelligence Act, <https://eur-lex.europa.eu/el/reg/2024/1689/oj/eng>, Accessed on October 30th, 2025.

finding a balance between the strategic objectives of states and the innovation capabilities of technology companies.

When AI governance is shaped along these three pillars, it not only guides the development of technology but also redefines its relationship with law, democracy and human rights. For instance, when an AI algorithm produces erroneous outcomes or a data breach, questions such as who bears responsibility, which authorities have oversight powers, and which ethical standards have been violated are addressed within this governance framework.

In summary, AI governance forms a bridge between technology and society: while it protects the speed and efficiency of innovation, it prevents damages against social values, law and individual rights. This bridge is shaped upon different perspectives in various countries: A market-based approach in the United States (“US”), state-based approach in Republic of China (“China”) and human rights-based approach in Europe. This diversity creates both opportunities for cooperation and areas of conflict within the global AI ecosystem.

I. AI Governance in the United States: A Market-Oriented Approach

One of the most influential actors in the global landscape of AI governance is the United States, which regulates this area largely within a market-oriented framework. From a legal perspective, the American model is grounded in the principle of “minimal regulation, maximum innovation.” This approach reflects a historical extension of American liberalism, which prioritizes individual freedoms and entrepreneurial dynamism over state intervention.⁴

The AI policy of the United States is structured around a system in which the state acts less as a direct regulator and more as a facilitator of the technological ecosystem. Consequently, American AI governance demonstrates a far more decentralized and company-oriented character compared to the European Union’s “human rights-based” model or China’s “state-based” model.⁵

1. Market-Based Legal Logic

The fundamental assumption underlying technology law in the United States is that innovation thrives on freedom. Therefore, state intervention in the

development and commercialization of AI technologies is generally kept to a minimum. The legal system allows regulatory norms relating to emerging technologies to emerge not primarily through direct state regulation but through “self-regulation” by market actors. This approach is also influenced by the tradition of freedom of expression protected by the First Amendment.⁶ The US may even interpret algorithmic decision-making systems as an extension of freedom of expression. For this reason, state intervention in algorithmic processes such as content generation or moderation is relatively limited.

2. Legal Fragmentation and Soft-Law Mechanisms

One of the most striking characteristics of the American model is the absence of a unified federal AI law. Regulations governing AI and data protection are implemented through a fragmented set of institutions and legal instruments, including the Federal Trade Commission (“FTC”), the National Institute of Standards and Technology (“NIST”), and various state laws such as the California Consumer

⁴ Anu Bradford, *Digital Empires: The Global Battle to Regulate Technology*, Chapter 1: The American Market-Driven Regulatory Model, Oxford University Press, 2023

⁵ Ren Bin Lee Dixon, *Artificial Intelligence Governance: A Comparative Analysis of China, the European Union, and the United States* -Discussion:

The Context of Governance in China, the European Union, and the United States, The University of Minnesota, 2022.

⁶ First Amendment, U.S., 1791. <https://constitution.congress.gov/browse/amendment-1/> Accessed on September 30th, 2025

Privacy Act (“CCPA”)⁷. This fragmented regulatory environment has contributed to the development of numerous soft-law instruments rather than a single unified legislative framework for the governance of AI in the traditional sense. The AI Bill of Rights Blueprint⁸, published by the White House in 2022, is a non-binding document providing guidance at the level of ethical principles rather than legally enforceable obligations. Similarly, the NIST AI Risk Management Framework⁹ promotes principles such as safety, transparency, and accountability in algorithmic systems, yet it does not create binding legal obligations. While this reflects the flexibility and innovation-friendly character of the US legal system, it also creates significant gaps in terms of accountability and the protection of fundamental rights.

3. Company-Based Governance

In the United States, the governance of artificial intelligence is largely carried out by major technology companies. Corporations such as OpenAI, Google, Microsoft, Meta, and Amazon have become actors that shape not only markets but also ethical standards.

These companies shape AI policy in ways comparable to regulators, through their economic power and technical expertise. For instance, OpenAI’s Responsible AI principles¹⁰ and Google’s AI Principles¹¹ have been widely referenced by policymakers and regulatory bodies worldwide.

However, such self-regulation mechanisms may remain insufficient in safeguarding the public interest. Companies naturally pursue profit maximization, and ethical principles are often implemented only insofar as they do not conflict with commercial interests. This situation gives rise to what is often described as a “regulatory gap.”

4. Balancing Democratic Values and Economic Interests

The American model generally approaches AI governance through a triangle of market freedom, individual rights, and national security. However, maintaining a stable balance among these three elements is not always straightforward. For instance, allegations that social media algorithms influenced electoral processes became

⁷ California Consumer Privacy Act, California, 2018. https://coppa.ca.gov › pdf › ccpa_statute, Accessed on December 7th, 2025.

⁸ AI Bill of Rights Blueprint, Washington. <https://bidenwhitehouse.archives.gov/ostp/ai-bill-of-rights/>, Accessed on September 30th, 2025.

⁹ NIST AI Risk Management Framework, Gaithersburg. [https://www.nist.gov/itl/ai-risk-](https://www.nist.gov/itl/ai-risk-management-framework)

[management-framework](https://www.nist.gov/itl/ai-risk-management-framework), Accessed on September 30th, 2025.

¹⁰ OpenAI, Responsible AI Principles, <https://openai.com/safety/>, Accessed on November 3rd, 2025.

¹¹ Google, AI Principles, <https://ai.google/principles>, Accessed on November 3rd, 2025.

particularly prominent following the 2016 US presidential election and the Brexit referendum. The Cambridge Analytica scandal revealed that the personal data of millions of users had been collected without consent and used to influence voter behaviors. This incident demonstrated that algorithmic systems possess the potential not only to shape information flows but also to influence democratic decision-making processes.

Following these developments, increasing pressure for accountability emerged in the U.S. Congress against technology giants, and executives of companies such as Meta (Facebook), Google, and Twitter were repeatedly called to testify before congressional hearings. However, these inquiries and calls for regulation largely remained limited, as concerns were raised that strict regulation could slow technological innovation and weaken the United States' global competitiveness.¹² As a result, AI ethics in the United States has become an area that has developed primarily under the leadership of the private sector. American universities and technology companies

actively support research on ethical AI; however, these efforts generally remain at the level of guiding principles rather than binding legal norms.

5. Global Influence and the “Diffusion of the American Model”

The market-oriented governance model of the United States forms the foundation of American dominance in the global digital economy. This model has led to the export of both technology and regulatory norms. Software infrastructures, cloud services, and the platform economy have indirectly disseminated American legal and regulatory approaches across the globe. For instance, the content moderation policies of American platforms such as YouTube, X, and Meta effectively determine practical boundaries between freedom of expression and hate speech across many countries. This dynamic creates a form of “private regulatory power” that operates independently of the formal legal authority of states.¹³

In this respect, the American model represents not merely a regulatory framework but also a new interpretation of digital sovereignty. It foregrounds the notion

¹² ABA, Manipulating Social Media to Undermine Democracy, U.S., 2017, https://www.americanbar.org/groups/public_interest/election-law/american-democracy/our-work/democracy-database/manipulating-social-media-undermine-democracy/, Accessed on November 3rd, 2025.

¹³ Alex He, AI Development and Governance in China amid Geopolitical Tensions, CIGI Paper No. 338 — November 2025, <https://www.cigionline.org/static/documents/no.338/He.pdf>, Accessed on November 2nd, 2025.

of corporate sovereignty over traditional state sovereignty.

II. AI Governance in China: A State-Based Model

The global rise of AI technologies has brought not only economic and scientific transformation but also political and ideological competition. One of the most striking aspects of this competition is China's state-based AI governance model. Unlike the market-driven liberal approach of the United States or the rights-based regulatory framework of the European Union, the Chinese model is built upon strong state control, strategic planning, and national security priorities.¹⁴

1. State Dominance over Technology

In China, AI policy is not merely an element of economic competition but also an extension of the state's effort to maintain political sovereignty. The Chinese government approaches digital transformation not only as a matter of "economic development" but also as an issue of "control". Consequently, in China AI is perceived not as a tool for expanding individual freedoms but rather as a

governance technology designed to maintain collective order and social stability.

China's strategic direction in this field was defined by the "New Generation Artificial Intelligence Development Plan" published in 2017.¹⁵ The plan, while aiming to make China the global leader in artificial intelligence by 2030, also emphasizes that technological development must be aligned with the Chinese Communist Party's policies on social stability. Therefore, AI in China is regarded not only as a component of economic growth but also as an element of ideological cohesion. Within this framework, activities such as data collection, surveillance, and content control are generally regarded as legitimate exercises of state authority.

2. Data Sovereignty and Digital Nationalism

China's AI governance model is fundamentally structured around the concept of data sovereignty. China considers data as a "strategic national resource" and strictly controls data flows. This approach stands in direct opposition to the Western model of "free data flows".

¹⁴ Anu Bradford, *Digital Empires: The Global Battle to Regulate Technology*, Columbia Law School, 2023.

¹⁵ China's 'New Generation Artificial Intelligence Development Plan', Stanford University, 2017,

<https://digichina.stanford.edu/work/full-translation-chinas-new-generation-artificial-intelligence-development-plan-2017/>, Accessed on November 2nd, 2025.

The Data Security Law¹⁶ and the Personal Information Protection Law (PIPL)¹⁷ enacted in 2021 provided the legal foundation for China's vision of digital sovereignty.¹⁷ These laws require personal data to be stored within China and subject cross-border data transfers to state approval. Through these mechanisms, the Chinese state exercises control not only over the data of its own citizens but also over the data generated by foreign companies operating within Chinese territory.

This regulatory framework constitutes the legal foundation of what has been described as the “Digital Iron Curtain”^{18,19}. Within this paradigm, data is not merely an economic resource but also an instrument of national security and political legitimacy.

3. Surveillance Society and the Concept of Social Harmony

One of the most distinctive features of China's AI governance model is the digitalization of state surveillance.

Technologies such as facial recognition systems, smart city infrastructures, and large-scale data analytics are widely used as “modern” tools for maintaining social order.

For instance, the social credit system evaluates economic, social, and political behaviors of citizens and assigns them scores that effectively function as a “measure of digital loyalty”^{19,19}. Although this system is often criticized in Western countries as a form of “authoritarian surveillance”, the Chinese government presents it as a mechanism for enhancing social trust. Artificial intelligence technologies lie at the core of this system: facial recognition algorithms, behavioral analytics, and big data integration place individuals' digital identities under continuous state surveillance.

This approach clearly demonstrates that China places the concept of “social harmony”²⁰ ahead of the Western emphasis on “individual freedom”.²⁰

¹⁶ Data Security Law (DSL), Stanford University, 2021, <https://digichina.stanford.edu/work/translation-data-security-law-of-the-peoples-republic-of-china/> Accessed on November 2nd, 2025.

¹⁷ Personal Information Protection Law (PIPL), Stanford University, 2021, <https://digichina.stanford.edu/work/translation-personal-information-protection-law-of-the-peoples-republic-of-china-effective-nov-1-2021/> Accessed on November 2nd, 2025.

¹⁸ Noah Berman - Lindsay Maizland -Andrew Chatzky, Is China's Huawei a Threat to U.S. National Security, 2023.

<https://www.cfr.org/background/chinas-huawei-threat-us-national-security> , Accessed on November 2nd, 2025.

¹⁹ Hicham Adarok, Customer Loyalty in the Digital Era: Toward an Integrated Conceptual Framework of Engagement, Trust, and Relationship Quality, Morocco, 2025.

<https://ijemd.org/articles/customer-loyalty-in-the-digital-era-toward-an-integrated-conceptual-framework-of-engagement-trust-and-relationship-quality-2025-11-01> , Accessed on December 7, 2025.

²⁰ Li Jing, The Impact of Confucian Ethics on Social Harmony in Contemporary China, Journal of Philosophy, Culture and Religion, 2024,

4. The Ideological Dimension of Regulation

In China, AI regulation reflects the permeability between technology policy and political ideology. The government supports private-sector technology enterprises; however, it expects these entities to operate in accordance with the state's political line. Within this framework, AI research and investments are largely carried out through state-supported national “champion companies” (such as Baidu, Alibaba, Tencent, and Huawei). These companies function simultaneously as market actors and as instruments of state strategy.²¹

One of the central regulatory developments in this context is the “Algorithmic Recommendation Regulation”²², adopted in 2022.²² This regulation requires that algorithms operate in accordance with the ideological values of the party. In other words, algorithmic systems are expected not to maintain political neutrality but rather to function in

alignment with the state's ideological framework.²³

5. AI as an Instrument of Economic Power

The Chinese government views artificial intelligence not only as a tool of domestic political control but also as an instrument of global economic competition. To this end, China is rapidly expanding its technological capacity through AI research centers, subsidized investments, and national strategic plans.

Within China's post-2020 digital strategy, the slogan “**AI Made in China 2030**” symbolizes not merely an economic objective but also a broader aspiration for technological independence and digital sovereignty vis-à-vis Western economies. This strategy seeks to position China not only as a producer within global supply chains but also as a **standard-setting power** in emerging technological fields.^{24 24}

<https://iprb.org/journals/JPCR/article/view/2604/3033>, Accessed on December 5th, 2025.

²¹ Anika Shahjabin, China's AI Capitalism: Varieties of Capitalism, State Strategy, and Socio-Cultural Embeddedness in the Pursuit of Technological Dominance, University of Glasgow- Department of Economics, 2021. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5439495 Accessed on January 21st, 2026.

²² Algorithmic Recommendation Regulation, China, 2021, <https://www.chinalawtranslate.com/en/algorithms/#gsc.tab=0>, https://www.cac.gov.cn/2022-01/04/c_1642894606364259.htm, Accessed on December 7th, 2025.

https://www.cac.gov.cn/2022-01/04/c_1642894606364259.htm, Accessed on December 7th, 2025.

²³ Steve Rolf, China's Regulations on Algorithms, Fes Briefing, 2023, on Algorithms, Fes Briefing, 2023, <https://digit-research.org/insights/chinas-regulations-on-algorithms/#:~:text=The%20new%20Chinese%20provisions%2C%20consisting%20of%2035%20brief, and%20e-commerce%20to%20fraud%20prevention%20and%20platform%20work>, Accessed on December 5th, 2025.

²⁴ Maia Gamsakhurdia- Giorgi Chkhikvishvili, International Relations, Strategic Influence, and

6. Contradictions and Impact of the Chinese Model

China's AI governance model provides an effective regulatory system through its disciplined and holistic structure; however, it has also attracted substantial criticism regarding individual rights, transparency, and the rule of law.

Human rights organizations in the United States and the European Union frequently describe China's digital surveillance policies as examples of "authoritarian AI." China, however, responds to these criticisms by invoking arguments of 'cultural difference' and 'sovereign rights. According to the Chinese perspective, the individual rights-centered approach to human rights prevalent in Western societies is not necessarily compatible with the more collectivist social order characteristic of many Asian political traditions.²⁵ Accordingly, the Chinese model represents not only a form of technology governance but also proposes an alternative legal and value framework. It envisions a digital society in which the state plays a guiding role, and citizens are

expected to "consent to" surveillance mechanisms for the sake of maintaining social order.

7. China's Influence in the Global Landscape

The Chinese approach to AI governance is increasingly gaining influence among developing countries. Some governments in Africa, Central Asia, and Latin America have adopted China's model of balancing digital infrastructure and state control as a development strategy.²⁶

This trend has transformed debates over AI governance from a purely technical matter into a fundamentally geopolitical issue. The central question is no longer "the technology" itself, but who governs it.

III. AI Governance in the EU

With the rise of AI, the EU has been assertive in becoming a leader not only in technological evolution but also in a right-based governance model. Unlike the market-based strategy of the US and the state centered strategy of China, the European model has been built upon a human-focused,

Public Policy- AI Technologies and XI Jinping's "Chinese Dream" – A New Paradigm of Soft Power, European Political and Law Discourse (2025), 12, 6. <https://eppd13.cz/wp-content/uploads/2025/2025-12-6/05.pdf>

²⁵ Anu Bradford, Digital Empires: The Global Battle to Regulate Technology- The Chinese State-Driven Regulatory Model, Columbia Law School, 2023.

²⁶ Zhong NAN, China to Enhance Digital Ties With More Countries, China, 2023, <https://govt.chinadaily.com.cn/s/202307/12/WS64ae43be498ea274927c4cbb/china-to-enhance-digital-ties-with-more-countries.html>, Accessed on December 6th, 2025.

right based and fair regulatory framework. The EU approaches technological competition not only as an economic instrument but also as a test in terms of social justice, equality and the protection of rights.

1. A Value-Based Governance Approach

Throughout the digitalization process, the fundamental principles of the EU have been shaped around the concepts of “human dignity” “justice” and “social co-operation”. The most crucial feature distinguishing the European model is its right-based regulatory approach. The EU views AI not only as a driver of economic growth, but also as a tool to enhance the social welfare. For this reason, EU adopted a strong political vision that technological developments should progress in alignment with human rights.²⁷

As emphasized in the EU Commission’s report dated 2020, “the economic growth may be deemed fair when it is inclusive; all social groups in society, especially the disadvantaged groups, should benefit from such growth.”²⁸ This perspective clearly

indicates why the EU places significant emphasis on concepts such as fair competition, transparency and accountability in the AI regulations.²⁹

2. Justice and Balance of Power in the Digital Economy

The EU seeks to reduce the power asymmetries arising from the concentration of the digital economy in favor of the giant companies. Recognizing that digital evolution granted superiority to a few technology companies (particularly US based major tech firms) in terms of economic and political power, the EU regards this development as a damage to the fair competition and democratic balance.

Digital Markets Act³⁰ and Digital Services Act³¹ developed within this framework, aim to protect the competitive nature of the market and guarantee consumer rights. These regulations, based on the principle of “preventive justice”, aim to set equal conditions for the competition of small and medium-sized enterprises in the market. At the same time, based on the principle of

²⁷ News European Parliament, Artificial Intelligence Act: MEPs adopt landmark law, 13-03-2024. <https://www.europarl.europa.eu/news/en/press-room/20240308IPR19015/artificial-intelligence-act-meps-adopt-landmark-law>

²⁸ The White Paper on Artificial Intelligence, European Parliament, 2020. https://www.europarl.europa.eu/RegData/etudes/BRI E/2020/648773/IPOL_BRI%282020%29648773_E N.pdf?utm_source Accessed on December 6th, 2025.

²⁹ Anu Bradford, Digital Empires: The Global Battle to Regulate Technology -The European Rights-Driven Regulatory Model, Columbia Law School, 2023.

³⁰ Digital Markets Act, (EU), 2022, https://digital-markets-act.ec.europa.eu/legislation_en?utm_source Accessed on November 1st, 2025

³¹ Digital Services Act, (EU), 2022, https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng?utm_source Accessed on November 3rd, 2025.

“belated justice”, such regulations aim to provide the distribution of revenues arising from the digital evolution on a more balanced basis.

3. Right-Based Regulation: The Artificial Intelligence Act

The most significant step taken by the EU regarding AI governance has been the AI Act adopted in 2024. This act is unique in the world since it classifies the AI systems on a risk-based approach and sets obligations of different levels. It sets conditions of transparency, data quality, human oversight and accountability for the high-risk systems (such as algorithms used in judicial, employment or healthcare systems)

This regulation demonstrates not only the EU’s objective in technological field but also its objective as ethical and legal leadership, as the EU aims to have a standard-setting role at the international level in order to provide that the AI does not harm human rights, privacy or democratic values.

The underlying principle behind the EU Act is that social legalization of the digital

evolution is as important as its market success. Therefore, the EU model is measured not only by the economic efficiency but also by the protection of human rights.

4. Fair Taxation and Distribution of Digital Revenue

Another aspect of the EU’s digital governance strategy is to ensure a fairer distribution of the revenues generated by the digital economy. EU member states have adopted a common approach against low tax payment and avoiding tax payments strategy of the giant technology companies. Digital Services Tax³², which developed within this framework, aims to ensure that the revenues generated from the digital economy must be distributed more equitably for the benefit of the society.

This approach demonstrates that the EU’s governance model places not only the consumer but also the citizen, at its center. The EU argues that technological power must be balanced with the public welfare; and it views that it is an ethical obligation to

³² **Digital Services Tax (DST)** is an indirect tax imposed on revenues earned by digital platforms in countries where their users are located. It was proposed by the European Commission in 2018 and aims to ensure fair taxation of large technology companies (such as Google, Facebook, and Amazon) for their digital activities within the European Union. See: *Proposal for a Council Directive on the*

Common System of a Digital Services Tax on Revenues Resulting from the Provision of Certain Digital Services, European Commission, Brussels, 21.03.2018 https://taxation-customs.ec.europa.eu/system/files/2018-03/proposal_common_system_digital_services_tax_21032018_en.pdf Accessed on December 8th, 2025.

redirect a portion of revenue to those adversely affected by the transformation

5. Protection of Platform Workers

The rise of the AI-supported platform economy (for instance, the digital labor platforms such as Uber and Deliveroo) has brought a new challenge for the EU in respect of social policy. The EU, by criticising the confinement of workers of such platforms to the status of “independent contractor”, has taken the necessary steps for expanding rights related to social protection and employment security.

The first such step is the “Proposal for a Directive on Improving Working Conditions in Platform Work”³³. The aim of this proposal is to determine the status of platform workers and to ensure that, these individuals are recognized as employees, where the platforms meet the specified criteria. Thus, the workers may benefit from the fundamental rights such as social security, leave and the protection of labor rights.

Additionally, a requirement for human oversight was introduced regarding the use of algorithms to evaluate and score performance or distribute the work. This

regulation is such an important step in order to prevent discrimination by the systems and violation of the employee rights.

Moreover, “European Pillar of Social Rights”³⁴ has been fundamental in the improvement of the fair working conditions principle. In line with such regulations, the EU member states have commenced to make their national legislation in harmony. Such policies have been indicators of EU’s social justice based digital evolution principle. The protection of data rights of the platform workers, the principle of algorithmic transparency and fair payment system reflect the EU’s vision of protecting labor against technology.

6. Philosophical Foundations of the EU Model

The EU’s general approach to AI governance is based on the philosophy of “the rational person” and “the common good” inherited from the Enlightenment. This philosophy provides that technology must be used for the benefit of society as a whole rather than only for the powerful. The European model serves as a third route as an alternative to the free-market liberty of the

³³ Proposal for a Directive on Improving Working Conditions in Platform Work, (EU), 2021. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52021PC0762&utm_source Accessed on November 3rd, 2025.

³⁴ European Pillar of Social Rights, (EU), 2021 https://employment-social-affairs.ec.europa.eu/policies-and-activities/european-pillar-social-rights-building-fairer-and-more-inclusive-european-union_en?utm_source Accessed on November 3rd, 2025.

US and state-based pragmatism of China: a value-based digital sovereignty.

The objective of this model is to set forth ethical sovereignty as well as strategic sovereignty over digital technologies. The EU aims to set forth normative standards in order to protect the digital future of the individuals and the society.³⁵

³⁵ Valentin Wittmann, Timo Meynhardt, Human-centric AI governance: what the EU public values, what it really, really values, Government Information

Quarterly
<https://www.sciencedirect.com/science/article/pii/S0740624X25000784>

CONCLUSION

At the global level, AI governance can no longer be understood solely in terms of technological capacity or economic competition. It has instead become a multidimensional field of contestation shaped by the values, ideological orientations, and legal understandings adopted by states. In this context, the United States, China, and the European Union represent three distinct approaches to AI governance, each seeking to project its own model at the global level.

The market-oriented and innovation-driven approach of the US rests on a liberal vision that prioritizes technological development and entrepreneurial dynamism. China's state-driven and pragmatic model, by contrast, positions AI as one of the central instruments of national development and strategic power. The European Union, situated between these two approaches, seeks to develop a rights-based model of governance centered on human dignity, justice, and the common good. The differences among these three approaches are reflected not only in their technical regulatory choices, but also in a deeper vision of how the digital world ought to be structured.

Against this global backdrop, it is also important to assess Türkiye's position in the field of AI governance. While Türkiye's existing legal system provides a framework that is grounded, at the constitutional level, in fundamental rights and freedoms, its digitalization policies in practice appear to be shaped largely around the objectives of economic development and administrative efficiency. In this respect, Türkiye's framework may be understood as more closely aligned with the European Union's rights- and values-based approach than with the United States' market-oriented model. Nevertheless, it should not be overlooked that the strong capacity for centralized direction observed in the Chinese model may, at times, prove effective in public policy.

For this reason, from Türkiye's perspective, a model of AI governance that is based on the European Union's approach, but adapted in light of local needs and institutional capacity, may be regarded as more feasible. Such an approach would make it possible both to protect fundamental rights and to ensure the sustainable technological progress.³⁶

In conclusion, preferences regarding AI governance are not merely technological decisions, but strategic choices that directly shape the legal, ethical, and social future.

³⁶ B. Sina Güneş, Artificial Intelligence and Emerging Technologies in Türkiye: Legal Adaptation from a Constitutional and Public Law Perspective, Journal of

Artificial Intelligence and Human Sciences, 2025. <https://zenodo.org/records/16233510> Accessed on January 20th, 2026.

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Editors

H. Sena Lezgioglu Özer

Nursena Çetingöl

Translators

Aysu Güneş

Özen Atlıhan