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Elected Director of CERI at the end of 2023, Professor Balme previously served as Dean of the Sciences Po Undergraduate College and as a diplomat at the French Ministry of Foreign Affairs based in Beijing. A founding member of the European Science Diplomacy Initiative (ESDI, 2020), her current research centres on scientific diplomacy, tech diplomacy, China's science policies, deglobalization, and China/US/EU relations. She holds a PhD in political science (Sciences Po, 2000) and an HDR in law (2016), and has taught widely across Paris, Beijing, Hong Kong, and New York.

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Yuyang Hong's doctoral research examines how Chinese street-level bureaucrats working in local Taiwan Affairs Offices shape the formulation and implementation of China's policy toward Taiwan, drawing on interviews and ethnographic fieldwork to explore their familial, educational, and professional backgrounds. He holds a research Master's in International Relations from Sciences Po and a BA in French Language and Literature from Renmin University of China, and speaks Chinese, English, French, and Southern Min (Taiwanese Hokkien). He co-coordinates the Doctoral Workshop on Contemporary China at CERI alongside Nowmay Opalinski.

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Dr Glattli researches the uses and receptions of the past in colonial and postcolonial South Asia, examining heritage conservation policy, memory, and the tensions between institutional archaeological frameworks and vernacular practices of connecting with the past. His doctoral thesis (Humboldt University Berlin, 2024) examined the history of the Archaeological Survey of India from 1944 to 1972; his forthcoming book Preserving Heritage for the New Nation (Primus Books) develops this work, and his current project focuses on how Indian princely states (Hyderabad, Gwalior, Bhopal) appropriated concepts of archaeology and heritage during the colonial period. He also teaches "Heritage and Identity in South Asia" at Sciences Po's Le Havre campus.

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Dr Leung's research focuses on diplomatic history, Jewish history, Polish history, and the history of human rights, with a doctoral thesis examining Jewish minority diplomacy in Poland between 1919 and 1939. He has been a Fox Fellow at Yale University and a doctoral scholarship recipient from the Foundation for the Memory of the Shoah, and has taught European and Asian history at Sciences Po's Le Havre campus. His thesis is co-directed by Sabine Dullin (Sciences Po) and Audrey Kichelewski (University of Strasbourg).

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Dr Khair holds a PhD in comparative constitutional law from Panthéon-Assas University (Paris II), with a thesis on minorities' rights in unitary states in the Near East (Unité de l'Etat et droit des minorités: Étude constitutionnelle comparée du Proche Orient). She teaches at Sciences Po Paris (since 2016) and at the Faculty of Law of Saint Joseph University of Beirut, is a member of the Paris Bar, and serves as a legal consultant for the French Ministries of Health, Labour and Social Services.

Foreword

This volume of the APRC Research Journal represents something we are genuinely proud of. APRC began with a conviction: that undergraduate students, given the right structure, mentorship, and intellectual community, are capable of producing work that is rigorous, original, and impactful. It was also founded to address a gap on our campus by creating a space where students could develop their research skills, explore academic inquiry beyond the classroom, and cultivate the interests that may shape their future scholarly trajectories. This journal is evidence of that conviction. The papers collected here were developed, presented at our inaugural Research Symposium before a jury of expert scholars drawn from Sciences Po's faculty, and revised into the work you now hold.

The volume is organised into five sections, each tracing a different register of Asia-Pacific politics. The first opens at the broadest scale, examining China's global footprint through the Belt and Road Initiative and how it reshapes trade, strategic geography, gender relations, and developmental trajectories across Africa, Europe, and Asia. The second turns inward to questions of identity: how states, media, and political actors construct, suppress, and instrumentalise who counts and who is represented. The third examines domestic governance in its many forms, from electoral patronage in Thailand and the structural permanence of Korean division to Japan's fiscal pressures, the politics of port automation, and the long-contested architecture of EU–ASEAN trade. The fourth closes the symposium track at the most human scale, with communities rendered stateless or trafficked through the cracks of the systems described throughout. The fifth section is a departure in kind: a selection of papers completed during the academic year through Sciences Po coursework and identified as meeting publication standards, recognising that rigorous undergraduate research can emerge well beyond the symposium track.

What strikes us most, reading across these papers, is not their range but their commitment: to asking questions that have not yet been asked, to sitting with difficulty, and to writing through it. That is what we asked of our researchers, and that is what they delivered.

We are grateful to the Scientific Advisory Committee for their mentorship and review, to the jury of our Research Symposium for their time and rigour, and to the administration of Sciences Po for their fundings and support. Above all, we are grateful to the research groups who entrusted APRC with their first serious academic work.

This is Volume I. We intend it to be the beginning of an enduring tradition: a journal that each year enables students to discover research, contribute to academic debate, and take their first steps into scholarly life.

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This journal extends a special recognition to the three prize winners of the APRC Research Symposium, held on 23 April 2026. The following papers were selected by our jury – composed of Dr. Allen-Mestrallet, Dr. Brookes, and Dr. Camroux – for their quality, originality, and contribution to scholarship on the Asia-Pacific region. Congratulations to the authors for their dedication to the making and diffusion of rigorous research. We hope readers find as much interest in these papers as our jury did.

1st
FIRST PLACE

PRIZE WINNER

Beyond Borders: Addressing Statelessness Among the Sama-Bajau Sea Nomads While Preserving Maritime Sovereignty

Emily Fan, Mayuka Hashimoto and Risa Komoriya

2nd
SECOND PLACE

PRIZE WINNER

Evaluating the Implications of the Belt and Road Initiative on Global South Developmental Trajectories: A Theoretical Frame for Sino-Afro Relations

Mithil Goyal and Anish Parcha

3rd
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Constituency Overperformance in Thailand: A Simple Political Patronage Indicator

Thanapat Skulpanich

Jury: *Dr. Allen-Mestrallet · Dr. Brookes · Dr. Camroux*

APRC Research Symposium · 23 April 2026 · Sciences Po

Section

I

Geopolitics and International Relations

Five papers examine how states, blocs, and multilateral initiatives shape the rules and routes of international order — tracing China's strategic footprint through the Belt and Road Initiative across Africa, Europe, and Asia, and asking whether the long-stalled architecture of an EU-ASEAN free trade framework can finally be brought to life.

EVALUATING THE IMPLICATIONS OF THE BELT AND ROAD INITIATIVE ON GLOBAL SOUTH DEVELOPMENTAL TRAJECTORIES

A Theoretical Frame for Sino-Afro Relations

Asia Pacific Research Circle

Sciences Po

Anish PARCHA and Mithil GOYAL

May 2026

Abstract

This paper evaluates the role of the Belt and Road Initiative (BRI) in shaping developmental trends in the global south. The BRI, through systematic investments, has not simply revealed profound economic consequences but also has influenced and redefined the regions of the global south. Adding to the discourse, this paper employs the theoretical lenses of realism and constructivism to evaluate China's international relations, which remain mobilised by the BRI. This paper seeks to add the dimension of realist constructivism to international relations theory to analyse China's engagement in the Global South, through a case study of the Angola model. This paper uses qualitative markers to posit that Sino-Afro relations under the umbrella of the BRI follow patterns of realist constructivism, which remain highly nuanced and extend the scope of international relations theory.

Keywords: Belt and Road Initiative, global south, Sino-Afro, Realist constructivism

Authors' Note

We are grateful to Professor Stéphanie BALME for her guidance on the research design and to APRC for the opportunity to present this work, and declare no further conflicts of interest.

Notable Remarks

Second place prize winner, 23rd of April, Symposium

1 Introduction: Tracing the Sino-Afro relations through imagined solidarity.

The People's Republic of China (PRC) underwent a long process to concretise its place in the 20th-century world. The changing world power dynamics intersected with China's efforts to secure the establishment of the PRC to replace the old regime of the Republic of China (ROC) (Lynch, M. J., 2010). The Chinese Civil War (1946- 1949), fought between the Guomindang and the Chinese Communist Party (CCP), led to this movement and marked the emergence of a new Chinese regime, one established in the context of the Cold War and the quest for freedom in many colonised regions. The duality of this time period fostered the first exchanges and diplomatic ties between Africa and China. This paper defines this time period as the initiation of Sino-Afro relations. The establishment of the PRC coincided with the emergence of Africa's independence movements, offering Chinese leaders a unique opportunity to build new and dynamic partnerships (Zheng, Y., & Carayannis, T, 2023). China started to view Africa as the basis for leveraging the CCP's global recognition. Africa could play a vital role in the PRC's international recognition as the sole legal government, thereby undermining the ROC's international standing. This led to a major policy initiative, where China in the mid-1950s decided to expand its foreign policy arena beyond Asia and the Communist bloc into the new world of Africa.

Therefore, the initial diplomatic relations between China and Africa were a long-drawn-out result of the Cold War, Postcolonial African freedom, and the emergence of the PRC, leading to nuanced expressions of solidarity. The idea of Solidarity is essential to highlight, as it forms an interesting basis for diplomatic relations. Drawing the idea of Nationalism as a concept manifested in the minds of the community (Anderson, 1983). Imagined Solidarity, as a concept, has dominated China's discourse on forging relations with postcolonial countries. China's impending search for legitimacy coincided with a large-scale decolonisation of African Nations, reinforcing the idea of a common hardship that required mutual cooperation to concretise the developing nations' place in the Eurocentric world. This influenced China's relationship with newly independent Africa all throughout the 20th century (Wahl, G, 2025). Imagined Solidarity can be expressed deeply in China, as it draws on its own history to push for integration and cooperation with developing nations. China proudly showcases its trajectory, leaping from a poor country to a diverse, robust, technologically advanced economy with the world's largest middle class. The Chinese economic boom allowed the middle class to grow from 29 million people in 1999 to roughly 531 million in 2013, accounting for almost 40 per cent of the population, a feat that has led developing countries to seek to replicate it. The lessons on economic development and know-how by the Chinese are welcome in many developing countries. In the case of Africa, economic challenges vary from an urgent need to diversify the economy and create employment opportunities for the large young population to establishing digital infrastructure. Thus, leaders in Africa have not shied away from expressing admiration for the Chinese economic boom and a keen willingness to learn from the Chinese. The Finance Minister of Angola, Vera Daves, said in 2019 that China has "enough experience" « to help countries in Africa overcome their development challenges » (Machado, 2021).

2 Literature Review: The concept of the Belt and Road Initiative (BRI).

The idea of Imagined Solidarity in the 21st century has concretised as the more profound Belt and Road Initiative. The Belt and Road Initiative (BRI) was proposed unilaterally by China in 2013, focusing on connectivity and cooperation to provide investment and develop infrastructural ties with neighbouring countries (Chang, YY, 2019). The initiative comprises the overland Silk Road Economic Belt and the sea-based twenty-first-century Maritime Silk Road. With this initiative, China aims to build a web of infrastructure, including roads, railways, telecommunications, energy pipelines and ports, to facilitate development across three continents: Asia, Europe and Africa. The BRI is a project of unprecedented geographical and financial scale. In order to support this grand project financially, China has launched an alternative set of (China-oriented) global financial institutions, like the Silk Road Fund and the Asia Infrastructure Investment Bank (AIIB) in 2014 and 2015, respectively. Further, the Silk Road Fund is funded by various Chinese state institutions and totals around US$40 billion, backed by large foreign currency reserves; the AIIB was created with an estimated US$100 billion, specifically for infrastructure projects in Asia. The project has heavy financial backing, with Chinese engagement through financial investments and contractual cooperation in 2021 across the 144 countries of the Belt and Road Initiative, totalling about US$59.5 billion (Christoph, Nedopil, and Wang, 2022).

The Belt and Road Initiative (BRI) is a comprehensive investment initiative aimed specifically at the Global South. The BRI has deeper implications specifically for Africa. China has become a major player on the continent and has changed Africa's infrastructure and economic development prospects (Mrdaković and Todorović, 2023).

Under the Belt and Road Initiative, through the construction of road and railway infrastructure, port development, and a military presence at one of Africa's strategic ports, China projects its economic power and gradually shapes Africa's modern development. The BRI has provided a broad umbrella encompassing all investments directed from China to Africa through foreign direct investment, trade promotion, lending, infrastructure development, official development assistance, military presence, and port construction and reconstruction. To date, 52 African countries have joined the BRI, 44 of which are low- and lower-middle-income. Circumstantially, China is Africa's largest bilateral trading partner: over the past 20 years, China-Africa two-way trade has surged almost 22-fold, and China's FDI flows to Africa have increased 67-fold since 2003, amounting to 5 billion USD in 2021. Foreign Direct Investment stocks in African countries stood at 51 billion USD in 2021, with 65% of these funds invested since the initiation of the BRI. For example, the Mombasa-Nairobi Standard Gauge Railway (SGR) project in Kenya was constructed in 2017 by the China Road and Bridge Corporation (CRBC). Funded by the Export-Import Bank of China through loans, the project cost approximately US$3.6 billion. This made it one of the biggest infrastructure developments in Kenya since independence.

From the perspective of financing these projects, between the years 2000 and 2020, African countries borrowed 160 billion USD from China, over half of which was for transport and energy projects. Angola secured 43 billion USD from China, predominantly for mining and energy projects, followed by Ethiopia with 13,7 billion USD, Zambia with 10,1 billion USD, and Kenya with 9,3 billion USD. Around 80% of these funds were provided by China's policy bank. China's generous investments in Africa, mobilised through the BRI, definitely carry loan-defaulting and investment-safety risks, yet China continues to direct substantial financial resources and has utilised its IMF reserves to write off, to date, 23 interest-free loans to numerous African countries. These circumstances naturally raise questions about why such financing and infrastructure projects are being pursued by China. What does China, a global superpower, get in return? Are the Chinese truly selfless saints without any self-interest to pursue? (Liu, Wei, et al., 2024)

To critically analyse the initially proposed question, this paper employs an international relations theory lens to contextualise the flow of investment and the mutual impact that China and Africa have developed since the commencement of the BRI. The following section will present a theoretical elaboration on realism, constructivism, and realist constructivism; this elaboration will concretise the qualitative analysis prevalent throughout this paper.

2.1 Theoretical frameworks: Understanding realism

The tradition of political realism, also known as realpolitik or power politics, has a long history typically traced back to the Greek historian Thucydides in the fifth century BC. In contemporary light, for most of the post-World War II era, realism has been the dominant paradigm in the Anglo-American study and practice of international relations (Donnelly, 2000).

Despite the growth of Constructivist ideas in the post-Cold War era of globalisation, realist theories, although much less dominant, still provide a context and motivation for many of the most important theoretical debates in the field. The long history of realism implies a great diversity in how the nature of realist power is defined. Realism as an approach to international relations has emerged gradually through the work of a series of analysts who have forged a distinctive but still diverse tradition of analysis. Realists assume that the real issues of international politics can be understood by the rational analysis of competing interests defined in terms of power. (Smith 1986: 219–221). The rational front sits at the core of realist action, one which is derived from state centrality and growing perceptions of global anarchy. States are understood to adopt instrumentally rational policies in their pursuit of power or security. Complementing the notion of rational analysis, realist schools of thought adhere to the idea of power as the fundamental feature of international politics, in which international interactions are essentially conflictual. This state-centred view is highly prevalent as necessity, and reason of state are known to trump morality and ethics (Schweller 1997- 92). A moral dimension to understanding realism is essential, as the theoretical base of realist ideas is centred on primitive conceptualisations of morality. Realism emphasises the constraints on politics imposed by human nature and the absence of international government. Together, they make international relations largely a realm of power and interest.

> *"Human nature has not changed since the days of classical antiquity" (Thompson 1985: 17)*

This nature, according to realists, is at its core egoistic, self-inclined and thus inalterably inclined towards immorality. Machiavelli elaborates this as "it must needs be taken for granted that all men are wicked and that they will always give vent to the malignity that is in their minds when opportunity offers" (Donnelly, 2000). Opportunist inclination driven by 'human nature from classical antiquity' serves to be at the cornerstone of defining realism. Realists characteristically give primary emphasis to egoistic passions and "the tragic presence of evil in all political action" (Morgenthau 1946: 203). The egoistic passions are known to be at the root of conflict. As Carr (1946: 231) emphasises, "It is profitless to imagine a hypothetical world in which men no longer organise themselves in groups for purposes of conflict". Realists are unanimous in holding that human nature contains an ineradicable core of egoistic passions; that these passions define the central problem of politics; and that statesmanship is dominated by the need to control this side of human nature. A key element of realist ideas is the lack of a well-defined international government. This deprivation accentuates anarchy, as it allows for the propagation of egoistic behaviour. (Schuman, 1941) elaborates that, in the absence of an international government, "the law of the jungle still prevails," implying the impacts of disorder and a lack of collective identity. The intersection of egoistic behaviour and anarchy-driven societies is known to be one of the functional bases of realist power. (Butterfield, 1949) implies how anarchy not merely allows but encourages the worst aspects of human nature to be expressed. The tension inherent in realism is expressed as the tradeoff between functional and utilitarian state benefit and moral responsibility. Realists claim the centrality of power, explaining how "The struggle for power is universal in time and space" (Morgenthau, 1948). The centrality of power exemplifies how states operate on a rational-choice, utilitarian basis; this centrality invites scepticism about moral concerns in international relations. Ethical considerations should ideally defy egoistic and opportunistic logics. In the case of realist perspectives, ethical considerations are justified through the notion of raison d'état, or reason of state. (Morgenthau, 1954) defined the reason of states to be inherently and inevitably egoistic, imposing a rational logic onto questions of morality.

2.2 Theoretical frameworks: Understanding constructivism

The end of the Cold War brought about a disengagement from alliances and a reduction in antagonism. This new vision for understanding international relations was centred on the notion of new normative, cultural, economic, social, or political practices that alter conventional wisdoms and standard operating procedures. The central role of agency was now being highly propagated in International relations as the notions of ideological alignment driven by spheres of influence during the Cold War era were no longer relevant. Constructivists stress that both structural continuities and processes of change are based on agency. Agency, in turn, is influenced by social, spatial, and historical context. Rather than granting ontological priority to either structure or agency, constructivists view both as "mutually constituted." The understanding of constructivism is based upon mutual consensus and structural fluidity. The historical ontology perspective of fixating agency due to structural immobility is rejected in the light of the new constructivism theory (Klotz & Lynch, 2014).

Constructivism rejects the individualism inherent in rationalist theories of choice, which take for granted the nature of actors' interests and identities. Constructivism sits at the intersection of contemporary agency, structural fluidity and mutual consensus. Constructivists characterise this interactive relationship between what people do and how societies shape their actions as the "mutual constitution" of structures and agents. This mutual constitution can be better understood through two primary pillars of modern constructivism: intersubjectivity and power.

An understanding of intersubjectivity deepens the initially presented notion of structural fluidity and agent-significance. Intersubjectivity refers to the norms, rules, meanings, languages, cultures, and ideologies that represent social phenomena, create identities, and guide action. Over time, these shared identities attain specific meanings to become stable, creating social orders that constructivists call structures or institutions. The creation of a structural consensus on social structure facilitates rules and norms that set expectations about how the world works, what types of behaviour are legitimate, and which interests or identities are possible. Therefore, this complex cycle of social structure formation is defined by intersubjectivity. The process from the formation of shared identities to the cultivation of structures and institutions that finally create rules governing international relations.

A central tension evident in intersubjectivity is the formation of a collective identity. The inherent diversity in contemporary societies leads to a forged collective identity which often caters to a majority. On a holistic level, if dominant social identity constitutes international representation, the fate of minorities and other diverse communities deteriorates. Thus, power, another key pillar of constructivism, aims to bridge this key tension. Power, expressed in the Cold War era, underscored this tension. Dominant intersubjective understandings, such as those that defined the American and Soviet as enemies rather than allies during the Cold War, are characterised as powerful because they constitute people's identities and interests and frame interpretations of behaviour. The key concepts of practice and discourse are essential to defining constructivist power. The forging of a dominant, often non-inclusive identity is referred to as 'practice'. These habitual actions emanate from dominant interpretations. To concretise the dominance of certain practices, cultural and social cues are mobilised. For instance, the combination of language and techniques employed to maintain dominant interpretations is known as 'discourses'. Adding nuance to the initially proposed tension in constructivist power. The conception of the exercise of power can be understood as the ability to reconstruct discourses to shape 'dominant' practices, offering an understanding of how dominant meanings condition identities and actions. Thus, the dominant representation is framed as a discourse aimed at seeking inclusive validation from society.

Essentially, constructivism centres on the process of normative formation and validation, grounded in the ontological premise that structure and agency are mutually constituted. Their intersubjective understanding leads them to reject the existence of objective facts distinct from the concepts that give them meaning.

2.3 Theoretical frameworks: Realist Constructivism

There exist inherent tensions in both realist and constructivist understandings. Constructivists are subject to the dominant shared identities that create institutions and norms, whereas realists are subject to the alienation from the ethical-political factors that shape international relations. These inherent tensions lead to a more intersectional, non-binary approach to the study of international relations. International relations are complex relational approaches that cannot be reduced to binary models of realism and constructivism, thereby bringing realist constructivism into theoretical discourse. The relationship among representations of power is essential to understanding realist constructivism (Barkin, 2003).

Realism ascribes an immoral inclination toward power, an immorality that realists deem necessary for the proper functioning of state-centric International Relations. Constructivists bring a moral dimension to power, addressing questions of shared identity and the normative formations of mutual consensus. Realist constructivism specifically elaborates on the intersection of power and morality. Questioning the realist view of deterministic power and the constructivist view of ethical normative power. A corollary of this intersection between power and morality is the observation that without addressing "the compromise between power and morality", we cannot successfully address the phenomenon of political change (Carr, 1964). Political change is understood to be the functional root of international relations, one that seeks to shape external relationships within societies. Realist constructivism underscores that practising international relations requires political change, which cannot be brought about by a single, universalised understanding of morality. Neither pure realism nor pure constructivism can account for political change; only their interplay can, subject to the assumption that morality is contextual rather than universal.

The realist constructivist approach would examine how power structures shape patterns of normative change in international relations and, conversely, how a particular set of norms affects power structures. Thus, the intersection of realism and constructivism is strongly evident in the formation of realist constructivism. Realist constructivism centres on a constructivist framework that presents a self-consistent set of arguments highlighting why power cannot be transcended in international politics. Thus, the key role of realist constructivists is to examine, from a moral perspective, the interrelationships between power and international norms sceptically (Jackson, 2004).

3 Methodology: Employing a qualitative case study of the Angola model using markers for theoretical frames.

This paper employs a qualitative analysis of essential BRI projects to posit them under the nuanced realist constructivism framework. To nurture this analysis, this paper will examine the Angola model as one of the foremost expressions of realist constructivism. To qualitatively understand realism, this paper uses the marker of influence and unethical power maximisation. Similarly, for constructivism, this paper uses the marker of mutual benefit and shared norms. Finally, to qualitatively analyse realist constructivism, this paper employs the markers of both realism and constructivism, termed as norm-based power expansion.

4 Analysis and Findings: Constructing realist and constructivist markers within the Angola model

Angola is one of the largest economies in Sub-Saharan Africa and is rich in natural resources, with about 8,160 million barrels of proven crude oil reserves as of 2019. This makes Angola Africa's second-largest oil producer and the world's eighth-largest oil exporter. This natural resource strength positions Angola to become the fourth-largest economy in Africa by 2050, behind Nigeria, South Africa and Egypt. This economic importance, coupled with vast oil reserves, made Angola a key partner of China in Africa. The rapprochement between the two countries began to take shape with agreements for credit lines to finance infrastructure projects in Angola.

Angola's dependence on foreign aid to develop infrastructure projects cannot be overlooked. This requirement for foreign aid, despite its pressing importance, was embedded within a layer of political power. The ruling elites in Angola did not seek to borrow funds from Western agencies, which would propel democratic reforms. The first stage of the Angola model was concretised by Angola's rejection of Western foreign aid and the concentration of power among African elites. The then-president José Eduardo dos Santos, gave preference to Chinese loans whose terms of negotiation implied no political change and a good amount of cash flow. This paved the way for Chinese financial intervention. In 2004, the first loan agreement was formalised between China and Angola, establishing an oil-backed credit line, which meant that oil was used as collateral in the event of a loan default. This agreement became known as the 'Angola Model' and marked a new type of financing for economic development, in which recipient countries could leverage their natural resources to secure credit from international sources to support development. Beyond the Chinese control on oil barrels, gradually, other conditions came attached to the loan, such as the provision that 70 per cent of construction and civil engineering awarded primarily to Chinese companies, and almost a third (31 per cent) of the main construction projects in Angola are in the hands of companies from China (Machado, 2021).

The credit line model adopted by China and Angola represented an innovative financing model for middle- and low-income countries. The resource-backed model of finance has been adopted in 14 countries across Sub-Saharan Africa and Latin America. This makes the study of the Angola model highly relevant in contemporary times. The BRI's financial specialisation allows it to cater exclusively to terms feasible for African nations; this unprecedented flexibility is largely absent from numerous other Western countries/ international funding organisations. The Angola model is based on the principles of South-South Cooperation coupled with an exclusive aid-granting financial institution, the Exim (Export-Import Bank). The Exim Bank granted the government of Angola a US$2 billion loan for post-war reconstruction. This model was meant to be a win-win solution in cooperation between equal partners (Jureńczyk, 2020).

Therefore, the Angola Model primarily consists of granting low-interest loans to nations which are more reliant on commodities, such as fossil fuels or mineral resources, as collateral. Developing countries guarantee the supply of raw materials, mainly crude oil, to Chinese enterprises. In turn, they participate in implementing development projects in their countries, as was the case in Angola.

4.1 Contextualising realist constructivism in the Angola model.

The primary instance of realist constructivism in the Angola model's function begins with the notion of South-South development. China engages in Africa in line with the principles of South-South Cooperation, which primarily include partnership, solidarity, equality, mutual respect, mutual benefit, and respect for sovereignty.

The involvement in Africa is based on the perception of China as a historic leader of third-world countries, ready to cooperate with any partner. In this way, China has become a key economic actor in Africa (Duggan, 2016). The positioning and portrayal of China as a member of the Global South are directly centred, reinforcing constructivism. The collective identity that China and Africa share as members of the Global South accentuates their incentives to engage in international trade. Despite being highly developed and relatively economically advanced, China demonstrates a commitment to Africa by supporting developing countries in achieving mutual benefits. Mutual benefits driven by the creation of a shared identity. This serves to be a key marker of constructivism. The concept of a shared identity within the Global South is coupled with the idea of mutual benefit. China's Five Principles of Peaceful Coexistence echo constructivist markers, serving as the ideological basis of China's foreign policy. These principles of mutual respect for sovereignty and territorial integrity, mutual non-aggression, non-interference in each other's internal affairs, equality and mutual benefit, and peaceful coexistence are inherently aimed at actively creating constructivist international relations. The mutual-benefit paradigm of the BRI is not merely theoretical. The Angola Model has been extremely beneficial for numerous African countries in terms of infrastructure. More than 6,000 kilometres of railways and roads have been built, along with 20 ports and over 80 power plants across Africa, with investment and credit from China. Thus, the Chinese presence in Africa presents an opportunity to bring innovation, much-needed finance, and elevate the position of African states in the global governance system.

The mutually constructed visions of international relations between Africa and China also have an inherent realist dimension, as part of the Angola model, China's interventions in Africa have been termed «the slow but ineluctable expansion of Chinese influence» (Maçães, 2018). After procuring loans and making heavy investments in Angola and numerous other countries following the Angola Model, China has been dismantling African agency, as oil-backed loans continue to create greater interdependence.

« Every Angolan owes 754 USD to China, » read the front page of the Angolan newspaper Expansão in May 2018. This extensive debt insurgency in Angola is a by-product of resource-backed loans, which exacerbate financial distress and contribute to the deterioration of debt sustainability.

Angola, as a member of the Organization of Petroleum Exporting Countries (OPEC), is caught in the cycle of international compliance. OPEC has recently been pressured to cut oil production due to its falling prices, a limit on exports, and oil cargoes compromised because of loan agreements, resulting in heavy revenue losses for Angola. This clearly accentuates the notion of loss of agency, agency which is a key part of constructive analysis, is strongly diminished due to the impositions of China's terms on the Angolan oil trade. Chinese loans account for around 45 per cent of Angola's external debt, and in 2019, Angola's debt to China surpassed US$22 billion, almost twice its debt to its second-largest creditor, Great Britain, at around US$12 billion that same year. Projections from the International Monetary Fund showed Angola's debt-to-GDP ratio at 111 per cent at the end of 2019, with China accounting for most of the debt, as a clear criticism of the government's practice of excessive fiscal borrowing.

The realist markers of influence and power maximisation in the context of the Angola model are evident in the sharp surge in aid from China, an amount that is practically impossible for African countries to repay, thereby entrapping them in a cycle of compliance that questions their agency in infrastructural development. The lack of agency due to heavy reliance on foreign aid, coupled with pressure from the OPEC bloc, has made Angola and other oil-exporting countries dependent on the Angola model and subject to severe financial losses. "Africa's development salvation doesn't lie abroad; it can only come from within," Kingsley Moghalu, a former deputy governor of the Central Bank of Nigeria, elaborated on the need to reduce excessive reliance on Chinese foreign development aid in Africa. Therefore, the realist marker of unethical expression through the diminishing of African agency is pertinent in the Angola Model.

This intersection of constructivist south-south cooperation and genuine infrastructural and economic growth for African countries, when intersects with the growing dependency, diminishing agency and impractical terms of aid, gives rise to the notion of realist constructivism, which at its core argues that power is central to constructivist inclinations, constructive relations cannot transcend the role of power in shaping norms and identities.

5 Discussion and Limitations:

This paper serves as a highly theoretical, qualitative discourse of international relations under the umbrella of the BRI. The relative strength of the arguments in this paper is significantly diminished by the lack of rigorous quantitative analysis. The utilisation of qualitative markers allows for a surface-level analysis of the functioning of the Angola Model; this paper, therefore, does not anchor data to build models for realist constructivism; it confines its analysis to the literature-backed qualitative elements.

6 Conclusion

This paper aims to extend the scope of international relations theory by conducting a qualitative analysis at the intersection of realism and constructivism, the two most popular schools of international relations thought. This paper critically questions the persistence of a binary theoretical framework for understanding Sino-Afro relations by highlighting key tensions within both realist and constructivist notions. Drawing on evidence from the Angola project, this paper highlights the persistence of realist constructivism in Sino-Afro relations.

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BRIDGING THE BELT AND ROAD
Chinese FDIs in the Balkans and the Emergence of CELSEL

Asia Pacific Research Circle

Sciences Po

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Abstract

The China-Europe Land-Sea Express Line – CELSEL – of the Belt and Road Initiative – BRI – grants China access to European markets. This paper argues that the prerequisite conditions for economic instability and institutional weakness enabled Chinese investment to grow along this corridor, and that, once in place, this investment has the potential to progressively shape the host government's decision-making, thereby increasing openness to Chinese investment. Through three case studies, we construct a profile of how China invested in each nation and the consequences for each. In Greece, the Eurozone debt crisis created the conditions for COSCO's acquisition of Piraeus. In Serbia, economic dependency has reinforced pre-existing Chinese favour. In Hungary, converging private and governmental interests drove the accumulation of Chinese foreign direct investments – FDIs –, ultimately manifesting itself in a reliable obstructionist force against attempts at unified EU policymaking against China. However, attempting to identify what came first, the institutional weakness or the Chinese investment, can be tricky; and there seems to be a 'chicken and the egg' relationship between the two. While, to a lesser extent, in Greece, in the Serbia and Hungary cases, whether originating from Chinese investment or domestic institutional failure, a positive feedback loop emerges: governments predisposed towards Chinese investment attract greater Chinese capital, which in turn consolidates that predisposition. This makes the BRI simultaneously the cause and consequence of deepening Sino-European entanglement.

Author Note

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"If you want to get rich, build a road first", (要想富先修路)

The Belt and Road Initiative (BRI) is intended to connect the Eurasian market and create a permanent pathway for Sino-European cooperation. While the EU and China have been oscillating between China being a "partner for cooperation, an economic competitor [and/or] a systemic rival" (European Commission, 2023), this is not the case for all of Europe. In the Balkan region, China has been pursuing ambitious investment plans, agreements and political alignment with many states. Organised under the Cooperation between China and Central and Eastern European Countries – C-CEEC – they operate particularly in states that have been, for a diverse set of reasons, alienated from EU relations. This essay will centre around Greece, Serbia, and Hungary, following the China–Europe Land–Sea Express Line – CELSEL – to observe how Chinese relations have developed in each of the case study countries.

Figure 1: China's proposed "Land Sea Express Route" (Malek, 2019)

In Greece, the main point of interest in CELSEL is the Athenian port of Piraeus. China's acquisition of a European port was a fairly natural one. After going from public to private property in 2009 (SRI, 2015), the sale of Piraeus ports I. and II. to China was not solely a Chinese attempt at control, but also a result of China being one of the few viable buyers. The 2008 crisis did not impact China in the same way as Europe, considering China was less dependent on American trade; while it still experienced a decline in trade with the West, which constituted approximately 30% of its GDP, it responded with multiple ambitious governmental stimulus packages, one amounting to 586 billion USD in 2009 to revitalise its economy (Yueh, 2010). This Europe struggled to do so effectively, given the added issues the Euro created: they couldn't independently inflate or deflate the currency in relation to each country's needs, resulting in the later Greek bailout agreement (Alphandéry, 2012). Moreover the Asian financial crisis occurred in the late 1990s and resulted in the formation of ASEAN+3, something which also meant the governments had a different method of integrating their economies; some scholars distinguish the integration of Asian economies moving from a de facto integrated economies - being frequent trading partners - to de jure trading partners – under a charter and with legal framework (Jean-Pierre Cabestan et al., 2012, pp. 136–172).

With this different style of trade, the 2008 market crash meant China had more to spend and allowed it to claim large market shares in EU markets, including Piraeus.

The pattern of Chinese expansion in the region - primarily through the use of Foreign Direct Investment (FDI) - continues along the CELSEL corridor into Serbia. However, the situation becomes more than just a purely economic engagement. While the Chinese FDIs are concentrated mainly in two fields: mineral extraction and manufacturing, accounting for 27.7% of Serbia's total FDI and representing the largest share of Chinese investment in Southeast Europe -SEE- (Alexandris & Krstinovska, 2023) there also very present in the technological field as Serbia is also a part of China's Digital Silk Road - DSR. But in the regional context characterised by illiberal tendencies and corruption, by gaining economic and digital dominance, they also gained political influence. This self-strengthening alliance between Belgrade and Beijing has resulted in a political administration further entrenched in its opposition to Europe.

The CELSEL corridor ends in Hungary, where the nation's geographic, economic, and political state has made it uniquely attractive to Chinese interests. Hungary has become a hub for advancing Chinese interests across Central and Eastern Europe (CEE). The shift in Chinese investments toward primarily greenfield developments, almost wholly concentrated in Hungary, has created a major battery production base, through which China seeks to deepen its ties with the European automotive industry (Kratz et al., 2024). With the Orbán government's facilitation of growing Chinese investment, this economic influence has had political consequences felt across the EU. Hungary consistently acts as an obstructionist force in the EU's attempts to pursue unified foreign policy responses to China, harming EU unity and granting Hungary greater leverage, which it has repeatedly shown it is not afraid to use (Greilinger, 2023b).

This all goes to show how there is a certain consistency in trends and behaviours along the CELSEL economic corridor. Increasing Chinese investment coincides with weak institutions and economies, enabling the rapid expansion of Chinese power and creating growing challenges for the EU's own interests in the area. There is an important discussion to be held about which of these causes came first. Was it antagonism towards the EU that drove these countries to seek closer ties with China, or was it Chinese influence that led to a rise in non-cooperative politics against the EU?

This all leads to the main issue explored in this research paper: considering the CELSEL as a gateway for Sino-European trade, how did Chinese influence develop in each respective country, and what political and economic effects has this had? Thus, we may observe how Chinese investments are the greatest in areas of institutional and economic weakness, and the growth in investment can, in some cases, expand to influence policy-making decisions - to varying degrees - which has weakened institutional strength, creating a vicious cycle.

1 Methodology & Literature Review

For the selected literature, the method will be to use a mix of primary documents - such as trade agreements, government statements, FDI reports, etc. - coupled with secondary scholarly sources discussing the situations in each region. Additionally, we will draw upon news articles and contemporary work to make our essay as relevant in the current political situation as possible. Secondary sources will span from circa 2010 to 2025, while data and news will be as up-to-date as possible.

Globally, scholarly debates on Sino-European relations are increasingly divided over whether China poses a threat. However, in the case of the Balkan region, many scholars raise an alarm about the effects of Chinese influence, claiming it negatively affects the health of democracies and the prospects for EU integration in the Balkans. Using a diverse set of papers from Western works - for example, from Oxford, works from Serbian authors, and even Chinese journals- this paper will endeavour to find a multifaceted perspective on the development of China's reach in the Balkans and the evolution of CELSEL.

In terms of the non-academic literature, we must acknowledge the credibility issues that arise in news sources. Though most of the news sources are from recognised national newspapers or outlets such as Reuters, some are more politically biased. However, the purpose of using these sources is not the same as in academic literature, where academic papers are used to construct arguments; most newspapers are used for individual statistics or quotes regarding the current situation. The credibility some of these newspapers may lack, and the impact this may have, are factors we must take into consideration if we want to make this paper as contemporary as possible.

Thus, we have made an active effort to try and take the knowledge and academic discourse which has preceded our work and apply it to the modern situation, all the while trying to tackle the process by which China - a country which on occasion lacks transparency - accumulates FDIs and influence in the Balkans in sectors where the EU has struggled to do the same. We wish to synthesise all this information into a final "profile" section that outlines the broader trends and provides a clear picture of the BRI's influence in the case study countries.

2 Limitations

We will pursue this research within a timeframe starting from the 2008 financial crisis. This is due to the sheer significance of the Eurozone crisis in triggering the start of the CELSEL corridor via the sale of Piraeus to Chinese investors, from which this expansion of influence via BRI took place. Additionally, we have chosen to focus on the case studies of Greece, Serbia, and Hungary, as they provide clear examples of how BRI investments manifest in different environments. Greece provides an example of an EU member state with a relatively healthy relationship with Brussels, and Serbia demonstrates how a non-EU state aligned with China behaves. Hungary, on the other hand, provides a composite of the two as an EU member state which prioritises its relationship with China over Brussels. Although North Macedonia is a crucial link in the CELSEL pathway, we have chosen to hone our analysis on regions where Chinese investment is more significant and its consequences are more nuanced. In the interest of space, we have prioritised certain projects and angles that exemplify different routes for China's expansion. For instance, due to the significance of the Piraeus port to the CELSEL project, we have prioritised the exploration of its acquisition over the political results of Chinese influence in Greece. Similarly, we will overlook the profoundly interesting military and police connections between the CCP and Serbia in favour of a deeper exploration of the existing digital surveillance network.

3 Case Studies

3.1 Greece

Starting in 2006, China and Greece have prided themselves on a "comprehensive strategic agreement” on cooperation which aligns them in political matters from Taiwan to Korea, and ensures economic cooperation (Karamanlis & Jiabao, 2005). Starting with the 2008 financial crisis, much of Europe - in particular peripheral states of the EU - became dependent on Chinese FDIs (Ma & Overbeek, 2015) including Greece. As of 2009 China acquired 16% stakes in Piraeus, followed by the 2016, acquisition of total 67% stakes in Piraeus’s multiple docks (Maltezou, 2025); this being the largest port in Greece and second largest in the Mediterranean region (Ahmed, 2024), it cemented Sino-Greek trade partnership. This relationship has remained strong and resulted in a grossed 12.6 billion USD in trade between the two countries bilaterally (Mylonaki, 2025); and even as of November 2025 China defends its holdings in Greece as the American ambassador makes acquisition requests to strip Chinese influence (Maltezou, 2025). This multi-year relationship is nominally rooted in shared culture between the two countries as maritime nations (Kotoulas, 2024), characterised by rapid Chinese expansion in many Greek industries from energy to tourism. Greece is thus also the first stop of the CELSEL, and holding Port Piraeus is simultaneously holding the “dragon head” of expansion opportunity into Europe (Kotoulas, 2024; Eszterhai). Thus the main topic of China’s geopolitical control in Greece - for the purposes of this paper - will be influences and ownership in Piraeus by COSCO. How it came to be, and what are its current consequences.

Sources tend to rank Piraeus as the 5th largest port in Europe, one which also leads to a key city - Athens; with this, many have speculated that China is pursuing control in Europe and attempting to use Piraeus as a stepping stone (Ntourountou, 2025). However, China has been on a course of natural growth since the eurozone crisis, and according to Xi Jinping Sino-Greek relations is about a pursuit of a “common destiny”. Moreover, Greek polarization towards China is speculated by some to partially be a result of the Trump administration of 2016-2020 (Can & Chan, 2020). While it can be assumed that foreign influence to this degree is a threat, China’s long term partners such as Greece, have repeatedly claimed China as a historically rooted and strategic partner (Doga et al., 2021). There’s an emergent concept regarding China’s actions in South-East Europe, the idea of “neo-mercantalism”. A concept of revitalizing not only the silk road but also the dominance of maritime trade in the world order and returning China to its dominant historical position (Maris & Kalaitzidis, 2024). However, the claims of shared history emerged following the Chinese acquisition of Piraeus, they were not the cause. The position that the Greek economy was put in due to the 2008 crisis was dire - one in which their national debt was equal to their GDP and a debt which would continue to rise to culminate in a national debt of around 200% of their GDP; however since 2020 their national debt has been declining with so much as a 11.8% decline from 2022-2024 (MacroTrends LLC, 2024). Meanwhile China, or more specifically COSCO’s involvement in Piraeus has made the port grow. Port volume is measured in a unit of “twenty-foot equivalent units” due to 20 feet being the standard size of a shipping container; from the 2009 initial acquisition to 2023 there has been a 271% increase in Piraeus’s shipping capacity coupled with a reconstruction of its infrastructure creating a 25 million ton shipping capacity and being China’s primary port for all goods travelling to Europe. Creating 3000 direct job position and 10 000 indirect job positions in the area and beyond, it is impossible to deny that Piraeus has had a positive impact on Greece in many ways generating an output of ca 1.4 billion euros in the jobs alone - accounting for circa 1% of Greece’s GDP (Kotoulas, 2024).

From this we must then consider whether this is a trade-relationship between Greece and China or China creating a deliberate burgeoning dependency on their investments. On the one hand it seems that more and more of the Greek economy is being propped up by Chinese involvement, however, there is also the question of the agency of Chinese actors. While it is common to conflate Chinese investors with the Chinese government, COSCO is a company which historically had significant agency. Much like the Chinese governmental principle of meritocracy, companies are rewarded for successful foreign ventures (Roy et al., 2024; Ma & Peverelli, 2019); while COSCCO is state owned, there is evidence that their investment into Piraeus was independent from government influence and was a business strategy put forward by the then COSCO CEO Wei, rather than a result of Chinese expansion (ibid.) Thus without CEO Wei pushing negotiations, there would have been no guarantee that Piraeus would be chosen as the link between maritime and land belt and road (ibid.). This is inline with the broader concept of Chinese governance and the system of meritocratic competition which claims to steer who is promoted within the system (Bardhan, 2020) considering the 26 Billion USD given as a reward to COSCO; but also with the conception that the Belt and Road Initiative itself is a bottom-up construction of Chinese ministers and company owners acquiring the stepping stones to connecting the parts of the Belt into a structured trade route (Yu, 2024, pp. 28–43).

Finally, as of late 2025 Brussels and Washington began to consider the threat Piraeus posed to the derisking strategies Europe was attempting to implement EU wide, the issue of the Chinese entanglement of the Balkan region has raised concerns amongst classically western nations as to the possibility of losing security in the balkan regions entirely (Zeneli, 2025). Even in 2026 the Trump administration asked to purchase Piraeus outright -"It's very important [...] to have American infrastructure here to help support the region, to perhaps in fact enhance output from other ports and areas to balance against the Chinese influence with the port of Piraeus," claims American ambassador Guilfoyle - which was naturally met with China’s response that the port of Piraeus is not for sale (Maltezou, 2025). While the western desire for autonomy is reasonable, the Chinese also have the authority to defend their stakes as they were bought legitimately. Moreover, the sudden shift asking Greece to reduce Sino-Greek relations will prove difficult after over 20 years of relations; especially considering that China aided Greece out of the economic strife which shook Greece’s trust in the EU in the first place (Buti et al., 2019). The tight knit relationship since the 2006 agreement with Prime Minister Kamaranlis (Karamanlis & Jiabao, 2005) - but also an imposition of foreign values onto Greece considering Greece’s sovereign choice to align with China on numerous political matters. In fact, despite recent EU-American concern about the ownership of Piraeus, writers such as Stamouli claim that “Greece sold Piraeus port under pressure from the country’s

European creditors, and COSCO was the only company to submit an offer" (Nektaria Stamouli, 2025); though debatable, it is known that the IMF and EU pressured Greece to "sell state-owned assets and enterprises to generate revenue and enhance competitiveness" and offset their their national debt (U.S Department of State, 2014).

Lastly, Piraeus is an investment which the CCP has invested in at length. In many ways, Greece isn't just dependent on China, but China, too, is dependent on Greece. If China loses the "dragon head" of the china-europe land-sea expressline it won't be able to move trade from Suez into Europe, something which China has been invested over 3 billion USD in (Shaw-Smith, 2023), and China is actively relying on for future expansion in European markets. While there is debate as to the relationship of European security and China's changes in Piraeus (Apostolopoulou, 2024), it is ultimately a Greek decision as to how far their relationship with China will go. While there is nuance to the positivity or negativity of Chinese influence in Greece, Serbia will add more to that discussion looking at how a non-EU state engages with the CCP.

3.2 Serbia

As a non-EU member, "Serbia claims to have become one of China's best friends in Europe" (Le Corre, 2018). That being a historic precedent set in stone in 2008, when the independence of Kosovo was made possible because of Western support (Arežina, 2017) . Even though now the government tries to play a multipartner game, the sentiment of alienation from the EU never truly left, as seen in a speech by President Tadić in 2011, who described Serbian logic as: "We are moving towards an EU… but that does not mean that the EU is invulnerable. Therefore, Serbia has been developing a policy of alternative pillars with China, Russia, Japan and Brazil."(Vuksanovic, 2021). But the balancing act is no longer an option in 2026, and the opinion that was prevailing before- joining the EU -has shifted. So what are we left with? The answer to that question can easily be perceived as China.

Since the 2008 global financial crisis - Serbia saw China as a source of financial aid with the retreat of the western support, therefore they announced the agreement on economic and technological cooperation in infrastructure development in 2009. This benefited the country's economy, but greatly disadvantaged the country's environmental and domestic policy, so ultimately the benefits are null (Vuksanovic, 2021 ; Alexandris & Krstinovska, 2023).

This relationship was reinforced when Serbia showed support to the "One-China" policy not recognising Taiwan's independence. That sentiment is mirrored by China as its one of two- the second being Russia- countries permanently on the UN Security Council that do not recognise Kosovo. (Alexandris & Krstinovska, 2023; Le Corre, 2018). But this relationship was mostly one sided until China saw the opportunity that the BRI and more specifically CELSEL allowed, to expand their influence not only in Southeast Europe - SEE - but also in the European economic zone. Within this context, China's expanding presence in SEE throughout Serbia acquires particular significance. These countries are interesting for China not only because of their geographical position - as a bridge into Brussels and central Europe- but also since their economic structure is widely dependent on foreign capital and technologies (Alexandris & Krstinovska, 2023), allowing for Chinese FDI to be welcomed by their leaders who already sympathize with illiberal and authoritarian ways of doing politics (Pleschová, 2022).

The main strategy China executed is that of economic dominance, infiltrating the market by FDIs and leading construction projects. From 2012-2022 Serbia had the largest amount of Chinese FDI in SEE, accounting for 27.7% of total FDI in the country (Alexandris & Krstinovska, 2023). In 2021, Chinese FDI rose to €630.4 million, making it second only to the EU - €1,762 billion-. Those FDIs are concentrated mainly in two fields: Mineral Extraction - where they most notably have a 63% stake in RTB Bor a takeover that cost them $1.26 billion and the €217 million acquisition of the Timok a copper-gold mine - and Manufacturing where the total investments in 2023 exceeded €1 billion (ibid.).

Furthermore, Serbia Joined China's Digital Silk Road - DSR- a infrastructure component of BRI that is aimed at building digital infrastructure that expands Chinese technological influence. The intention behind China's incorporation of Serbia is the ease by which they could distribute the narrative they wanted -of a technological superpower - and its geographical positioning within the CELSEL, allowing for more dominance in the region (Vuksanovic, 2021). This expansion into the field of technology was allowed by the government, even besides security concerns. Therefore, the concerning parts of the project and the general strategy of the DSR could be implemented leading to the installment of 1,000 surveillance cameras - who are equipped with advanced facial and license plate recognition - across 800 locations in Belgrade, whose locations remain unknown (Vuksanovic, 2021; Svidronova, 2020). Further bringing to light concerns about Chinese dominance in the European continent. But the main problem China presents is best captured by Jonathan Hillman from the Center for Strategic and International Studies who told The Financial Times: "A country such as Serbia might not sit down and decide they want to adopt Chinese standards, but after enough purchases and deals, they might end up with Chinese standards. There is the risk of lock-in, a point after which switching becomes too costly." (ibid)

This sentiment is not only echoed in economics, and digital fields, it also translates to politics and domestic affairs. The two most involved Chinese companies in construction: China Railway International Co. Ltd and China Communications Construction Company - CRIC and CCCC - were recently involved in many disputes. They were hired to do a reconstruction and modernization of the high-speed railway Belgrade - Subotica, and later sued for malpractice for one of the sections. This high-speed railway also included the reconstruction of the railway station in Novi Sad where 16 people lost their lives, due to knowingly carrying out work beyond the prohibitions of supervision (Željka Jevtić, 2025). While for the first part of the section they were investigated by the public prosecution for organized crime in whose report we can see that the primary responsibility lies with the contractor - Chinese Consortium- (Radonjic & Obranovic, 2026), the latter incident was not investigated, because the Vucic government has benefited greatly from Chinese FDI and general political support.

That same contractor – CCCC – has a poor reputation internationally as it was blacklisted by the World Bank for being accused of allegedly rigging bids in the Philippines in connection with the construction of a highway. Later in 2020 due to their participation in the construction of an island for the Chinese military, the US Bureau of Industry and Security in the

Department of Commerce put several CCCC subsidiaries on the list of countries with whom business is restricted (Željka Jevtić, 2025). And this is where the statement in the financial times reinforces itself, as the state was willing to continue using the same contractor on the second section where the incident later happened even after the internal investigation and other international suspensions. In the end there were enough purchases and deals to turn a blind eye.

Even though the Free Trade Agreement of 2023 made Serbia and China committed to democracy, social progress, freedom, and the rule of law, in practice the result is very different (FTA, 2023). By gaining economic and digital dominance they also gained political influence which translated further throughout the region enhancing their general position and making a gateway for further Sino-European trade.

3.3 Hungary

> *This section was researched and written before the parliamentary election victory of Peter Magyar on April 12th 2026, in which Viktor Orbán's Fidesz party was defeated in a historic landslide, ending 16 years of illiberal rule (Levy, 2026). Whilst Magyar's victory has been received with jubilation in Brussels (Schulten, 2026), Magyar appears to remain interested in continuing Chinese investments into Hungary (Corlin, 2026). This is all to show, until the new Magyar government is settled and starts pursuing reforms, predictions on the implications this change will have on Hungary's role within Chinese plans for the region would be misguided. Therefore we have chosen to keep our analysis unchanged, but urge the reader to continue with recent developments in mind.*

Whilst Greece serves as the entry point of Chinese influence to Europe and Serbia as its transmitter, Hungary stands as the final stop before dispersal across the Union. Hungary was the first EU state to sign into the BRI in 2015 (Fehér, 2025), a decision which placed Budapest in a unique geopolitical position and reflected the broader “Eastern Opening” strategy launched in 2011 (Greilinger, 2023b).

Supporters of the Orbán administration's approach see it as a form of pragmatic engagement and opportunity creation. It is claimed by Chinese sources that by 2024 Chinese investments in Hungary had created in excess of 10,000 jobs (China Daily, 2024). It is worth recognising that in recent years, Chinese FDIs in Europe have increasingly become greenfield – establishment – endeavours, almost the entirety of which has been concentrated in Hungary (Kratz et al., 2024). In 2023, 44% of Chinese investments in Europe were directed to Hungary (Zoltán, 2025) and received 62% of all Chinese Electric Vehicle – EV – related FDI in Europe in 2024 (HIPA, 2025). The EV industry is particularly important as with the EU's ambitious decarbonisation targets (DG MOVE, 2025), EU reliance on China-made EVs has been steadily growing, highlighting it as a sector of growing dependence among many others (IEA, 2025).

This field of manufacturing in particular has been a focus of growing Chinese investment. WIth a total of 9.3 billion USD in investments into the automotive industry since 2008 (China Cross Border Monitor, 2025) and new developments of complementary industries to EV production like Contemporary Amperex Technology's battery park – which is the largest single FDI in Hungary's history (Hungary Hub for Chinese EV Competitors, 2025), China is attempting to "[recognise] the potential of Hungary as a hub for automotive production" (China Daily, 2024). This battery park is to supply batteries to a number of carmakers, including BMW, Mercedes, Volkswagen, and Stellantis making China's larger aim on deepening trade dependencies with more developed European economies clear (Hungary Hub for Chinese EV Competitors, 2025).

This heightened Chinese investment is in large part due to the nature of China's aforementioned CELSEL serving as a cheap and efficient point of entry of Chinese goods into Central and Eastern Europe. With the Belgrade-Budapest Railway at its final stage of certification (Hungary Today, 2026), Chinese shipments to Hungary and, by extension, the rest of Europe are becoming increasingly profitable as it cuts transit times by 7-10 days compared to traditional trade routes (Zeya, 2024). This economic corridor is considered to be the flagship of the BRI in Central and Eastern Europe and just as is the case in other BRI countries, these developments are funded by Chinese loans and built by Chinese firms. The nature of this railway project in particular has drawn significant criticism from the public for appearing to offer very little material benefit to Hungary whilst China benefits from a streamlined transport corridor (Fehér, 2025). Despite this and the EU's continued ambitions of decoupling and de-risking Chinese relations, the Orbán government has not been deterred from pursuing closer ties with increasing vigour.

It has become increasingly clear that the Chinese economic investment and Hungary's entanglement with the BRI has precipitated political consequences, like being an obstacle to unified EU policy on China A prime example was the blockage of an EU statement on the South China Sea ruling in 2016 in unison with Greece. Similarly, Hungary's criticism of and unwillingness to cooperate with EU sanctions on China for their violations in Hong Kong and against the Uighurs. This convenient political silence even extended to the arrest of Canadian-Hungarian dual citizen and former diplomat Michael Kovrig by China in 2018 (Greilinger, 2023a).

Hungary's silence on EU lawmaking that opposes China alongside being a significant thorn in EU unity, dilutes any attempts at a unified approach directed by Brussels. This aligns with the Orbán administration's goals of creating a pragmatic foreign policy for their self-proclaimed "illiberal democracy" (Orbán, 2014) and coalesces with their wider reciprocity to other governments the EU has varyingly poor relations with like Russia, Turkey and the Trump administration. Hungary has exploited their position as a so-called "Trojan Horse" in the EU by showing their amicable relations with China, they have been pressured by the EU to commit more funds to keep the Hungarian government in-line (Greilinger, 2023b). Hungary has gone as far as becoming the first country in Europe to "panda bonds" – denominated in Chinese currency rather than Hungarian Forint, Euros, or US Dollars – to further attract Chinese investment in 2016 with the latest round being issued in 2022 well after the very public European policy shift to "decouple" with China (Fehér, 2025).

Domestically, despite 50% of the country preferring greater economic ties to the US whilst only 16% prefers China as a partner, 51% of the country had a favourable view of China compared to a fellow Visegrad country, Poland, who only had 35% (Silver et al., 2025). Out of the surveyed countries, the only country where favourable views of China were more popular was Greece (ibid). With government press coverage on China being largely neutral and focused on economic & trade benefits and a public which largely appears to be ambivalent to a larger discussion around Chinese foreign policy, it is perhaps not surprising that the Orbán government's China-friendly goals are largely pushed for by oligarchs and the clientalist elites of the country (Zgut-Przybylska, 2022).

This goes to show how through the BRI and its accompanying investments, the CCP has created a system by which Chinese "corrosive capital" and the deterioration of democracy in Hungary are mutually reinforcing each other (ibid.). Chinese funding – which is held to much less oversight and transparency than its larger EU counterpart – has brought the economic and, by extent, political power necessary for Orbán to strengthen his rule. He has in turn returned the favour by making Hungary an obstructionist force in EU foreign policy in opposition to China and by creating a business-friendly environment where Chinese firms can operate out of a strategically central EU country.

4 Profile

So far, these examples have painted an emergent trend, Chinese investment flourishes in areas of economic and institutional weakness and has begun showing its influence in policymaking in Serbia and Hungary to a significant degree. Were these countries driven towards increasing Chinese investment due to a fallout in EU relations, or was Chinese influence the reason for a growing divide between the EU and its periphery? This creates a 'chicken or the egg' causality dilemma.

It is difficult to come to a single conclusion, without oversimplifying. In Greece, the forced privatization of assets in the EU due to the Eurozone debt crisis tied the government to growing Chinese investment and, by extent, economic influence (Ma & Overbeek, 2015). Although Chinese political influence has not metastasized in Greece, there is always the possibility of the situation developing in a way similar to Hungary or Serbia, especially if the political scene in that country was to change to become more alike the latter two. Meanwhile, Serbia's historical antagonism towards the EU – as a consequence of previous confrontations in Bosnia and Kosovo – has resulted in a government which, while trying to balance EU relations, still pursues economic and political integration with China. But this relationship also further entrenched and supported non democratic tendencies, not only in economic relations but also in mutual support between the governments, especially those of Serbia and Hungary (Cottiero, 2023; Hungary Today, 2025). Hungary is perhaps the most interesting as despite their position within the EU, Orbán has pursued ever-closer economic and political ties with China. Chinese investments, pushed for by a collection of elites frustrated by the transparency attached to EU funding, have proven to benefit both China and Orbán with his allies, resulting in a Hungarian foreign policy which is ardently blocking any unified attempt at reprimanding Chinese actions by the EU.

The common trend across all of these is how once Chinese investment entrenches itself, the ruling regime becomes increasingly unwilling to fully align itself with EU goals around decoupling from China. It is difficult to make a decisive decision on whether Chinese investment drives political change, or whether cordial administrations attract Chinese investment. This dynamic is perhaps best exemplified in the form of a vicious cycle, where in the examples Serbia and Hungary in particular, greater Chinese investment increases the affability of the local governments and vice-versa. The BRI therefore is both the cause and consequence of this deeper embedding.

5 Conclusion

The BRI's CELSEL and by proxy Chinese FDIs occurred through differing means and had diverse consequences depending on the region. It is not unrealistic to posit that China's vested interest in CELSEL emerged as a by-product of their acquisition of Piraeus, and that the following growths in investment to Hungary and Serbia were to make good on their investment. While it is speculative to attempt to grasp China's intentions in each of the case studies, there is underlying evidence that the shape which CELSEL has grown to over time is not a result of a fully planned scheme by which China would access the EU; but as an emergent property of many instances of happenstance across the regions studied.

The process of Sino-Greek relations progresses along a similar route to China's relations in Asia, one founded in an ancient historical tie to the silk road and a claim of aligned values. China took its time to create a strong foundation for its relationship in Greece, but - were it not for the economic crisis - there is no reason to assume that China would have pursued an acquisition in Piraeus. In the case of Greece, the impacts of China and more specifically COSCO have - at the very least superficially - been positive, and most likely guided Greece out of times of crisis. Moreover, to Greece, China is acting mostly as a business partner, but still one which has marginally fewer political interests than it seems to show in other regions.

With the considerable Chinese presence in Serbia what has emerged is the general opinion that they are a more reliable ally and partner with reference to FDI, construction and other investments. And that is also a sentiment reinforced by the government not only in the media but also in their continued support for Chinese infrastructure projects. This is a result of a broader presence and influence in the region that is spreading from non-EU but previously EU aligned countries to full EU members.

The political and economic cooperation between China and Hungary through the BRI and its accompanying FDIs have proven to be fruitful for the invested parties on both sides. China has acquired a friendly base of operations in the CEE region from where they can operate key industries which are in high demand from Europe and Orbán has gained an international supporter that he can use as leverage against the EU. This alliance has resulted in EU actions against China being diluted or outright blocked by Hungary hampering EU unity significantly.

Each of these case studies, even with their differences, have begun to show a trend. Through the case study nations we see how economic and institutional weakness - be it from crisis or regime - can open a country to Chinese foreign investment, in many cases as China is the only country willing or able to invest. This profile calls into question the future balance of Sino-European trade, with western economic crisis growing all the more frequent, meanwhile China's economy has seen continued growth. Alongside this, with political crises arising in the U.S, there is a growing institutional conflict within the west. These two factors, combined with EUs climate policy and the emerging Chinese market for green technology, could mean that more nations in Europe could be more open to Chinese investment. With an increasing number of nations in the EU fulfilling the criteria put forth there, it is worth observing how Sino-European balance will be handled going forward.

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EVALUATING VIABLE ALTERNATIVES TO THE STRAIT OF MALACCA

A comparative Analysis of Costs, Risks and Benefits

Asia Pacific Research Circle

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Abstract

The Malacca Strait is a critical maritime chokepoint carrying 80% of China's imported oil creating a vulnerability known as the 'Malacca Dilemma'. This paper will discuss three primary strategic alternatives China is exploring to mitigate this issue: the China-Pakistan Economic Corridor (CPEC), the China-Myanmar Economic Corridor (CMEC), and the Landbridge Project. CPEC links the Gwadar Port in Pakistan to Xinjiang, but faces geographical obstacles, security risks, and extremely high transport costs. CMEC is a BRI project linking the Yunnan Province to the Kyaukphyu Port–including a 431-kilometer railway and energy pipelines; nevertheless it has been undermined by Myanmar's 2021 military coup and inherent ethnic armed conflict, shifting the project from a development to a resource-extractive model. Moreover, the Thailand Land Bridge is centered around two deep-water ports at Chumphon and Ranong–reducing transit times and costs while preserving Thailand's neutrality, though Thailand's increasing economic integration with China may afford Beijing influence over the project. Ultimately, while these alternatives aim to enhance energy security and provide a solution to the Malacca Dilemma, each faces significant political, economic, and logistical risks. Our contribution to existing literature is a final comparative analysis of the three alternatives based on three criteria: costs, risks and benefits.

Keywords: Strait of Malacca, Belt and Road Initiative, China-Pakistan Economic Corridor, China-Myanmar Economic Corridor, Kra Isthmus

Author Note

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1 Introduction

The Strait of Malacca is an essential strategic maritime choke point, running between the Indonesian island of Sumatra to the west and peninsular Malaysia and extreme southern Thailand to the east. As the shortest sea route connecting the Far East and Indian Ocean, the Strait of Malacca carries nearly two-thirds of China's maritime trade and around 80% of its imported oil. Around $3.5 trillion worth of trade moves through the Strait annually—equivalent to one-third of the world's GDP—making it one of the most critical sea lanes in global commerce. Shipments through the Strait include fossil fuel cargoes from the Middle East and Africa, and energy imports for Japan and South Korea, highlighting its global significance (Dosson, 2025).

2 Literature Review / Theoretical Framework

The Malacca Strait is critical to China's pursuit of maritime supremacy and its ambition to maintain its 大 国 (great power) status. However, this ambition exposes a vulnerability that is often referred to as the "Malacca Dilemma". First coined by President Hu Jintao at an economic conference in 2003, this term refers to the idea that any disruption in the Strait could threaten China's maritime power, crippling its economy and energy security. As such, since the 1980s, Chinese strategists have explored various alternatives to the Malacca Strait to reduce reliance on China's vulnerable eastern maritime flank. These include four main pipeline options: a channel through Thailand, a pipeline from the Bay of Bengal (from Myanmar, India, or Bangladesh) to Kunming, a pipeline from Gwadar, in Pakistan, to Xinjiang, and a pipeline from Iran through India, Pakistan, and Myanmar to China. While some of these projects promise shorter transit distances and strategic improvements, each alternative option still faces significant political, economic, technological and even geographical obstacles (Ji, 2007).

3 Methodology

This paper will focus on the viability of three of China's proposed alternatives to the Malacca Strait. First, it will examine the popular CPEC alternative, evaluating its overland corridor from Gwadar Port through Pakistan to Xinjiang, including associated infrastructure, security and economic challenges. Next, it will examine the China-Myanmar Economic Corridor, analyzing how China-Myanmar relations, ethnic conflict and "strategic hedging" have affected its implementation. Finally, it assesses the Kra Canal and Land Bridge initiatives in Thailand, focusing on their economic and geopolitical implications for China and local stakeholders. The paper will conclude with a comparative evaluation of the proposed alternatives and offer an assessment of their feasibility and potential outcomes in light of recent developments.

4 Analysis

4.1 China–Pakistan Economic Corridor (CPEC) Evaluation

The China-Pakistan Economic Corridor, otherwise referred to as CPEC, is one of the most prominently discussed alternatives to the Malacca Strait. While discussion of the "Malacca dilemma" originates from Hu Jintao's 2003 speech, the idea for the Chinese development of a corridor from Pakistan to China was reportedly initiated by former Pakistani President Pervez Musharraf (Garlick, 2021). Launched in April 2015 with initially US $46 billion in agreements (later increased to US $62 billion) as one of President Xi's flagship projects within the Belt and Road Initiative. It focused on developing overland transportation and potential pipeline links from Gwadar Port—in Balochistan—located on the Arabian Sea near the Strait of Hormuz and close to the Iranian border—through the Karakoram Mountains and the Khunjerab Pass, and onward to Kashgar in China's Xinjiang province as a land-based alternative to the Strait of Malacca. CPEC was established as a solution to the "Malacca dilemma", seen as an alternative which would reduce reliance on the maritime chokepoint and enhance China's energy security, while also promising to transform Pakistan into an economic corridor through investments in ports, highways, railways, and power plants.

The "Long Term Plan for China-Pakistan Economic Corridor" listed on the CPEC website—a national long-term plan approved by both the Chinese and Pakistani governments providing macro guidance for the implementation of CPEC—lists a number of opportunities provided by CPEC, emphasizing Pakistan's strategic location to boost industrialization and economic growth (China-Pakistan Economic Corridor Secretariat, 2017). According to the document, China views CPEC as an opportunity to develop Western China and expand the Belt and Road by using its capital and technology, while Pakistan sees it as an opportunity to build industrial capacity, reduce regional inequality, improve living standards, and also strengthen domestic stability. The two governments had envisioned initial infrastructure and bottlenecks addressed by 2020—near completion, improved livelihoods and balanced development by 2025—and by 2030 a fully operational corridor driving sustainable growth in Pakistan. Regarding investment plans, the Chinese government listed negotiating cooperation on oil and gas pipelines, power grid connectivity, electricity utilization, and financing for transportation projects, whilst the Pakistani government is responsible for setting urban rail transit standards, establishing tax and land policies, providing security for construction and operations, and maintaining databases and monitoring systems to track project progress.

Although the Long-Term Plan established in 2017 set a positive vision for CPEC, researchers have cited numerous challenges, which range from security risks, difficult geography to economic and infrastructural constraints that hinder CPEC's realistic implementation (Garlick, 2018). The Karakoram Highway, built between 1959 and 1979, is the essential northern route of CPEC, connecting China's Xinjiang region to Pakistan. This highway runs through rugged, earthquake-prone and unstable terrain, and during its original construction, over 1,000 Pakistani and Chinese workers died—highlighting its human and engineering costs. Moreover, the region is territorially disputed with India, resulting in politically sensitive infrastructure development. High altitude pipelines along this route require heating, insulation, and powerful pumping stations, with transportation costs estimated at 16.6 times higher than shipping oil via the Malacca Strait. Even pipelines across flatter terrain, such as Russia to China, cost about twice as much as maritime transport.

At the southern end of the CPEC route, Gwadar Port is intended to serve as the main maritime hub linking Pakistan to China. However, it currently has three multipurpose berths, with a maximum capacity of up to 70,000 DWT and a 12.5 meter draft, thus making it unable to accommodate major oil tankers or most large cargo vessels (Gwadar Port Authority, 2025). As of 2016, its handling capacity was around 1 million tons per year, far below China's 2015 oil imports of 355.5 million tons. Furthermore, the port is located in Balochistan, one of Pakistan's poorest provinces, with weak supporting infrastructure connecting it to the rest of the country. While the Gwadar Port Authority website highlights ongoing progress, including a 15 July, 2025 visit by Pakistan's Federal Minister for Maritime Affairs to the port and China Business Center, praising its development, some are still questioning whether the port can function as a major transshipment hub due to its limited capacity and weak supporting infrastructure.

Additionally, the entire CPEC route faces significant security risks, with Balochistan being particularly volatile due to persistent separatist insurgency since 2007. Direct attacks on Chinese personnel, including a 2004 bombing and 2017 kidnapping and killing of workers, along with nationwide terrorism risks and overstretched Pakistani security forces, emphasize the danger of the corridor. Chinese authorities also fear that militant activity could spill over into Xinjiang, prompting tightened security at the Khunjerab Pass in 2017.

Finally, there is a question of economic and financial risks along the route. Pakistan's weaker energy and infrastructure base requires massive Chinese investments, and often in the form of debt, which raises concerns about long-term dependency. Garlick notes that as of May of 2021, the only pipeline project listed on the official CPEC website was an incomplete LNG pipeline running from Gwadar to Nawabsha in Sindh province.

Ultimately, while the CPEC website and both governments have presented a detailed long-term vision for the corridor, its viability as a functional and secure alternative to the Malacca Strait remains unclear given the mentioned geographical, security, and infrastructural challenges along the route.

4.2 China-Myanmar Economic Corridor (CMEC) Evaluation

The Yi Dai Yi Lu—"One Belt, One Road" (OBOR) initiative, later rebranded as China's Belt and Road Initiative (BRI), is an ambitious geostrategic/geo-economic project launched in 2013 by Chinese President Xi Jinping. Despite Myanmar being a centerpiece in China's geostrategic "string of pearls", a network of Chinese military, commercial facilities and relationships along key sea lines of communication aiming to enable China to surround the Indian Peninsula while maintaining military presence in the Indian Ocean, the initiative was not introduced in Myanmar until late 2017 (Feng, 2020). The latter's reform process, started in 2011, and its western-leaning leadership's democratization efforts allowed civil society and anti-Chinese public sentiment, indirectly blocking any active promotion of the BRI and consequently compromising bilateral relations between the two countries. It was only in late 2017 that the world's second-largest economy proposed a flagship BRI project in Myanmar: the China-Myanmar Economic Corridor (CMEC). Having kept vague about every BRI project, China did not break the trend for the CMEC, and the lack of transparency from both countries prevents us from getting a reliable and realistic picture of the projects that would comprise the corridor. Analysts have nonetheless examined various official documents, trying to decipher components of the CMEC. A first insight into the contents of the project was given by Xi Jinping's signed article prior to his visit to Myanmar in 2020, where he wrote, "*Our two sides need to deepen results-oriented Belt and Road cooperation and move from a conceptual stage to concrete planning and implementation in building the CMEC. Efforts need to be made to promote the* ***three pillars of the CMEC****, namely the* ***Kyaukpyu Special Economic Zone****, the* ***China-Myanmar Border Economic Cooperation Zone*** *and the* ***New Yangon City.****"* This effectively identifies the Kyaukphyu Special Economic Zone, the Border Economic Zone and the New Yangon City project as the three pillars and hence undisputed components of the CMEC. Interestingly, the here unmentioned Kyaukphyu Deep-Sea Port emerges as the dominant hub of activity in the second indicator of the projects: a total of 33 documents, signed during Xi Jinping's January 2020 visit, which comprise Memoranda of Understanding (MoU), Handover Certificates, Exchange Letters, Letters of Intent, Protocol Documents and Implementation Agreements. An additional study of the four main projects for which documents exchange between Aung San Syu Kyi and Xi Jinping occurred, reveals the development of Yangon, the Cross Border Economic Zones; the overall development of Border Areas and greater institutionalised cooperation in trade, emerge as the major focus areas. In literature it was often deduced that the stall of these ambitious but opaque projects was due to issues such as regional unpopularity and ethnic violence; we aim in this paper to address and evaluate these problems within the framework of the eventual actual realization of the CMEC. Despite Myanmar's approach to the CMEC being one of 'strategic hedging', as proven by the gradual development of this project, its hedging capacity depends on its domestic and international political context, neither of which is stable after the 2021 February coup and inherent internal division between the Tatmadaw (TMD) and the National Unity Government (NUG) (Ciorciari, 2019). It is at this point relevant to note that China's influence over Myanmar's peace process traces its roots several decades before the latest coup. Since 1948, when Myanmar gained independence from the British empire, the country's internal political landscape has been characterized by civil conflict with consequent peace initiatives. Under the leadership of President Thein Sein, the democratization of 2011, led by the Union Solidarity and Devel- opment Party, ushered in a new round of peace talks involving at least 20 EAOs. China's influence over the China–Myanmar border EAOs, particularly those within the Federal Political Negotiation and Consultative Committee (FPNCC), is evidenced by concrete economic, logistical, and military links. These groups rely on the Chinese yuan, Chinese telecommunications infrastructure, and Mandarin for communication, and several issue official statements in Chinese. Most significantly, the presence of advanced Chinese-made weaponry in their arsenals—combined with SIPRI data showing that China accounts for 48% of Myanmar's arms imports (Wezeman et al., 2021)—demonstrates Beijing's substantial leverage over these EAOs and, by extension, the peace process. Following the 2017 Rohingya crisis, despite Japan, India, and South Korea's deep involvement in large infrastructure projects in Myanmar, (International Crisis Group, 2020) pushed by Myanmar's society's exacerbation by Beijing's exploitative natural initiatives, China paradoxically became an even more viable partner (Kobayashi, forthcoming), being itself under similar international criticism for its policies towards the Uyghur population in Xinjiang province. In sum, thanks to its unparalleled position in Myanmar, China was able to pursue the realization of the CMEC's project despite the 2021 military coup: focusing on protecting its investments and linking belligerents from the junta to its EAO opponents for this purpose, it has expanded its diplomatic influence with the internationally-isolated junta government, managing to obtain support for new CMEC projects and other investments. In this regard, it is important to note that the project focus has inevitably shifted as progress has been severely disrupted by fighting: the high-profile Muse-Mandalay railway continues to stay on hold, and construction only advances in Kyaukphyu and smaller connectivity projects. Within the framework of the BRI initiative in Myanmar focusing on smaller, securitized, and extractive investments coherent with the country's current fragmentation and instability, the CMEC has presently transitioned from a developmental to a resource-extractive project.

4.3 Kra Canal and Land Bridge Project Evaluation

Tracing its roots in the XVIII century, the idea of constructing a shipping canal in Southern Thailand to link the Pacific and Indian Oceans has consistently resurfaced ever since. The southern region of Thailand consists of a narrow isthmus located in the peninsula running roughly north to south: the Kra Isthmus. Connecting Myanmar and Central Thailand to the north and Malaysia to the south, it was under King Narai that it was considered a potential route for the canal. Feasibility studies however, had found this root to be topographically difficult for digging a canal 400 metres wide and 30 metres deep due to mountainous terrain requiring provision of locks to get the ships across the peninsula, like that of the Panama Canal, and consequent prohibitive cost of construction. By 2015, China had started showing interest in reviving this project as part of its 'Maritime Silk Road' initiative, under the BRI. A functioning Kra Canal would provide an unparalleled alternative to the Strait of Malacca: cutting transit times, reducing bottlenecks, and allowing for savings in fuel costs would reduce China's reliance on the Malacca Strait and enhance its energy security. Even more significant would be the accessibility of the Andaman Sea to the PLA Navy, with options for dual-use ports, radar stations, or logistical supply points. Parallely its realization would have a severe impact on various relevant geopolitical actors involved in the region: the United States's marine control over the Strait of Malacca would be undermined consequently massively weakening its ability to economically contain China, Japan would lose its central level for securing its energy imports, India would be challenged in its own ocean space and Singapore would be economically disempowered—its ports simply bypassed. Even more significant would be Thailand's diplomatic shift: once a neutral player and middle ground between East and West, being the Kra Canal a political commitment, the country would be suddenly perceived as part of a Chinese sphere of influence. These emerging geopolitical complications, coupled with the estimated high construction costs, from $25 to $30 billion depending on construction method, lock technology, and depth, over a decade-long estimated time for completion, nudged a decision by the Thai government in 2023 to construct a Land Bridge instead of a canal with two deep-sea ports at both ends. Firstly proposed by Prime Minister Thaksin Shinawatra in 2005, the land bridge project was snuffed out a year later when he was ousted in a military coup. Ironically, following another coup in 2014, the military resurrected the idea in 2020, though it failed to gain traction because of the global economic dislocation caused by the pandemic. Currently revitalized by Prime Minister Srettha Thavisim, the plan calls for the construction of deep water ports in Chumphon province on the

Gulf of Thailand side of the isthmus and Ranong province on the Andaman Sea side. The two ports would be linked by 90 kilometres of highways, railways and pipelines. Ships carrying goods made in Northeast Asia would unload their cargoes in Chumphon, which would then be whisked to the other side by trucks and trains, while vessels laden with wares from western Asia and Europe would do the same at Ranong. This land Bridge across the Kra Isthmus primarily reduces the distance for east-west shipping lines by 1200 nautical miles, transit time reduction between 3 to 14 days, and consequential impacts on logistic costs (unlike the Panama Canal, which saves 13000nm, and the Suez Canal, which saves 7000nm for international shipping, avoiding Cape routes). The most significant strategic advantage of the landbridge is its impartiality: it caters to many of China's economic aspirations, without the military and symbolic escalation associated with a canal. Beijing benefits from shortened travel routes, secure access to the Indian Ocean, and new transshipment hubs for energy export commodities—but avoids naval bases, US counter-reactions, and an overt power block. Thailand maintains its neutrality, ASEAN is united, and the US, Japan, and India remain composed since no sovereignty has been overtly compromised. Singapore may see a decline in influence, but it retains its port—the transition is practical, not symbolic. Power dynamics in infrastructure are reallocated—maritime power stays intact. Instead of a "Chinese corridor," what emerges is an open, investor-friendly logistics pathway—in which Western companies can also reap benefits. Thailand thus positions itself as a connected mediator, rather than a front-line state. The Land Bridge Initiative is projected to develop in four distinct stages. The initial phase is anticipated to conclude by the end of this year, with construction slated to commence in 2026, and the Land Bridge set to be functional by 2030 upon the culmination of Phase 1 tasks, which encompass the development of the Ports of Ranong and Chumphon at either terminus, along with the Railway and Highway connections. The remaining enhancement activities are scheduled for completion by 2038, divided into three phases.The necessary investments for this endeavour are substantial yet attainable. China's participation, though not yet confirmed, is widely anticipated and would prove mutually beneficial — providing Beijing with a strategic alternative to the Malacca Strait while accelerating the project's realisation. Multilateral Financial Institutions such as the World Bank and the Asian Development Bank, already funding transport infrastructure initiatives in the region, are equally likely to show keen interest. From a Chinese strategic perspective, the integration of its tech infrastructure, cyber frameworks, and digital supply networks would position Thailand as a cornerstone of an expanding and deeply interconnected trade ecosystem, reinforcing China's broader vision of regional economic integration. Whether via canal or land link, Thailand's transformation into a pivotal trade hub would represent a landmark achievement for the entire region.

5 Discussion and Limitations

Table 1: Comparative Analysis of the Three Alternatives

Routes	Costs	Risks	Benefits

China-Pakistan Economic Corridor (CPEC)	$62 billion infrastructure cost Transport cost: 16.6x Malacca Strait Construction fatalities (>1000 deaths)	Rugged terrain Separatist insurgency in Balochistan Route over disputed India - Pakistan territory	Xinjiang development Pakistan development
China-Myanmar Economic Corridor (CMEC)	$15+ billion BRI project	Civil war 2021: largely stalled post coup Significant environmental impact: displacement, oil spill risks near Rakhine State China dependent on a pariah junta; India and US opposition	Oil and LNG pipeline already operational Kyaukphyu deep-sea port & SEZ provide China's overland access to Indian Ocean Unlikely to fail due to Chinese interest
Thailand Land Bridge	≈ 997 billion baht ($28 billion)	No major global shipping companies permanently committed US-China competition; backlash from Singapore/Malaysia Involved procedures could take just as long as sailing through the Malacca Strait	Reduced shipping times: –1,200 km traveled Saving ≈ $100-200 billion annually and boosting Thailand's GDP by 5-7% Thai sovereign project Versatility: four-lane highway, double-track rail network, and possibly pipeline corridors for oil and gas ensure broader commercial appeal

6 Conclusion

In conclusion, as portrayed by the evaluation table above, a comparative analysis of the three aforementioned criteria ranks the Thai Land Bridge as the most strategic option considering its medium costs, medium risks, and high benefits. We rank the China-Myanmar Economic Corridor as the second most viable option out of the three due to its low to medium costs, high risks, and medium benefits; ultimately, the China-Pakistan Economic Corridor is ranked last as a result of its high costs, high risks, and low to medium benefits. Allowing for reduced shipping times between the South China Sea and the Andaman Sea, cutting distances travelled by at least 1,200 kilometres, saving the global shipping industry $100–200 billion, annually and commercially appealing due to its versatility, the Land Bridge Project presents all the necessary indicators to hypothesize its future realisation. Collectively, these findings suggest that the Thai Land Bridge represents the most strategically coherent and economically grounded response to the structural limitations of existing trans-regional maritime trade routes.

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THE 'GENDER' ROUTE
Mapping Gendered Globalisation in the BRI

Asia Pacific Research Circle

Sciences Po

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Abstract

Since its launch in 2013, women's development has been framed by Chinese President Xi Jinping as a central part of the Belt and Road Initiative (BRI). Despite this, scholars have contested the extent to which this functions in participant countries, particularly within the China–Pakistan Economic Corridor (CPEC). Using a gendered globalisation framework – defined as the ways in which globalisation produces and relies upon gender inequalities – the paper explores how women's trajectories have become an invisible social infrastructure of economic corridors. Through a comparative analysis of China, Pakistan and the Philippines, the study assesses changes in female visibility. It argues that whilst women are central to the initiative, their persistent invisibility reveals the structural limitations to their empowerment. Through its instrumentalisation through economic and development frameworks, exploitation becomes a recurring theme seen in participant countries. In certain contexts, such as Pakistan, this exploitation may take form in trafficking – implying how women's invisibility has enabled exploitation to remain unregulated. Ultimately, the paper concludes by stating that gendered globalisation in the BRI operates under a paradox where the participation of women is used to primarily benefit economic objectives, limiting improvements in gender equality as women remain hidden in invisible infrastructures.

Keywords: Belt and Road Initiative, Globalisation, Gender and Development, China–Pakistan Economic Corridor, Invisible Labour

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1 Introduction and Theoretical Framework

"Protection of women's rights and interests must become the commitment at the national level." – Xi Jinping (2020)

Commemorating the twenty-fifth anniversary of the Fourth World Conference on Women, Chinese President Xi Jinping emphasised the need to place women at the forefront of initiatives. Highlighting the importance of tackling gender equality, he argued that it is only through a global effort that women's development will be advanced. This discourse parallels the developments seen at an international level where there is a growing acknowledgment of the subject's centrality in global initiatives (Hepp, Somerville & Borisch, 2019, p. 677). This is reflected through the institutionalisation of gender equality and women's empowerment as part of countries' foreign policies (Bigio and Vogelstein, 2020, p. 1). Emerging in 2014, the first articulation of a feminist foreign policy would occur. Centred on the three "Rs," the policy was established with the aim to ensure increased rights, representation and resources for women and girls (Swedish Ministry for Foreign Affairs, 2018, p. 11). Further reflected through the fifth Sustainable Development Goal (SDG) centred on gender equality, these developments collectively signify the emergence of gender as a central dimension in global governance.

When discussing global governance, it often leads to a discussion of globalisation. Whilst this term is commonly understood through the interconnected nature of countries and their respective economies, a gender-focused approach to understanding the process is limited in conception. The framework of a gendered globalisation, although previously used by several scholars, has yet to be given a fixed definition. As part of Mapping Women, Making Politics, Roberts (2004) uses the framework to explain how gender dynamics structure global processes. She argues that through the shared global perception of women playing a more passive role in economic development, gender hierarchies are perpetuated through globalisation. On the other hand, Roll et al. (2024) focus on the convergence of economic, social and political globalisation to explain how women's participation has increased while inequality remains persistent. A common theme shared throughout these papers is how globalisation – through the continued focus on traditional gender roles – has limited women's empowerment. With acknowledgement to these previous utilisations of the framework, this paper posits the following definition to concretely conceptualise gendered globalisation: the ways in which globalisation produces and relies upon gender inequalities.

Returning back to President Xi's stance on women's development, this vision of gender equality may be understood through China's wider global development strategies. One key instance of these strategies is the Belt and Road Initiative. Often abbreviated as BRI, it collectively refers to President Xi's plans for the Silk Road Economic Belt and the 21st Century Maritime Silk Road (Ministry of Foreign Affairs of the People's Republic of China, 2017). A largely political and economic endeavour, it would see the expansion of trade routes as enabled through East and Southeast Asian economies (Chan, 2018, p. 111). This growth has subsequently resulted in the growing prevalence of a gender-focused discussion as women's rights and protection differ between participatory countries.

Utilising a macro perspective, Zhu and Hu (2023) illustrate the positive effects of the BRI's gendered globalisation in China through an analysis of gender inequality indexes. With a further consideration of how women make up 51.7% of the nation's skilled labour workforce, quantitative indicators can be said to illustrate how women have become key players in economic expansion (World Economic Forum, 2019, p. 125). However, the limited research on the politically embedded nature of these outcomes at a micro level raises questions on how far macro analyses of improvements in gender equality reflect the lived experiences of women. Furthermore, with no gender-specific policies implemented to ensure gender equality throughout the initiative, it creates an underlying possibility for these improvements being the result of indirect policies on economic growth.

These indirect consequences can also be seen in Pakistan where the improvements in the economic infrastructure may have contributed to improvements in gender equality. As argued by Faraz (2017), gender equality is largely tied to the security environment and structural marginalisation. Consequently, this means that improvements are conditional to the sustained inequality, rather than a structural transformation enabling women's empowerment. Nevertheless, the lack of an analysis centred on the transformative power of large-scale Chinese infrastructure limits the understanding of how the BRI may reshape rights and representation beyond economic indicators.

Similarly, studies centred on the Philippines highlight a limited understanding of the influence of geopolitical initiatives on gender relations. In his studies, Parreñas (2000, 2001, 2015) discusses how migrant Filipina women sustain the functioning of global economic systems through transnational carework and emotional labour. This is paralleled through Guevarra's studies (2009, 2010), who focuses on the valorising framing of migrant women by the state. This is understood through the objective of obscuring the entailed vulnerability of women. However, the fact that the findings of these studies are not integrated into transnational frameworks creates a fragmented understanding of the gendered infrastructures that sustain globalisation.

Ultimately, the literature centred on different participant countries illustrates how women are simultaneously incorporated into, and constrained by, China's contemporary globalisation project. Yet, these constraints require further micro level analyses to understand how female lives are transformed. Subsequently, this paper aims to fill in this literature gap by linking the micro-social dynamics of female workers with the macro processes of transnational economic integration. It will reflect on the central question: to what extent does the BRI produce a gendered globalisation, where women's trajectories become an invisible social infrastructure of economic corridors?

With the intention to narrow the question's scope and address specific concerns in a detailed manner, this paper will place a geographical focus in Asia due to how the BRI's origins lie in China, and its initial development began in Kazakhstan (land route) and Indonesia (maritime route) (Ministry of Foreign Affairs of the People's Republic of China, 2017). Taking into consideration the World Bank's 2024 country classifications by income level, it can be noted that the majority of Asian countries are placed in either the lower-middle income or the upper-middle income categories. Hence, to explore the different routes, income categories and regional aspects, an in-depth analysis was conducted on the following three countries: China, Pakistan and the Philippines.

These three countries were selected due to how gendered globalisation manifests in different forms across their diverse socioeconomic contexts. China, as the initiator of the BRI, serves as the central reference point through which a gendered discourse may be applied. With President Xi's emphasis on women's development, it becomes necessary to contrast China's gendered globalisation in comparison to participating countries within its own initiative. As a central project of the BRI, the China–Pakistan Economic Corridor (CPEC) will be studied through the addition of Pakistan into the paper's scope. Pakistan, as a case study, notably highlights both the positive transformation entailed through the BRI, as well as the possible repercussions of increased female visibility. For a more holistic comparative analysis of the BRI, this study extends to consider the maritime route with the intention to capture various forms of engagement. Thus, the Philippines will be used as a comparison point – representing a peripheral engagement within the BRI compared to China and Pakistan.

Henceforth, this paper will adopt a mixed quantitative and qualitative approach to assess the extent to which a gendered globalisation has occurred. Firstly, changes in female representation within different industries prior to and during the BRI will be utilised to examine the patterns of female integration within the process of economic globalisation. This will be examined through secondary statistical sources to examine how female lives have been transformed. Secondly, the paper will question the prevalence of a gendered globalisation through the recognition of women in domestic and foreign policies. This will be examined through a focus on how gender equality and narratives on women are constructed, mobilised and instrumentalised within different socioeconomic contexts. Through these conceptualisations, the presence of a gendered globalisation will be assessed through how gender inequalities are perpetuated and reflected within China, Pakistan and the Philippines.

In order to explore the different manifestations of globalisation in the BRI, the first section will centre on the BRI as a driver of economic globalisation by looking at the economic roles played by women and how this transforms their trajectories. Further building upon this, the second section will focus on the negative repercussions of the BRI through an analysis of bride trafficking and structural dependence on women. Finally, this paper will conclude by questioning whether a gendered globalisation is truly occurring through the BRI and its implications on ideas of gender empowerment and equality.

2 The BRI as a Driver of Economic Globalisation

2.1 Women as Key Players in the BRI

Launched in 2013, the Belt and Road Initiative (BRI) represents China's most ambitious attempt to reshape patterns of economic globalisation in the twenty-first century. Framed by Chinese leadership as an effort to build a "global community of shared future" and a more "inclusive world," the BRI combines the Silk Road Economic Belt and the 21st Century Maritime Silk Road into a vast transcontinental development strategy (Belt and Road Forum, 2023). Through investments hoping to develop in infrastructure connectivity, unimpeded trade, financial integration, policy coordination, and people-to-people exchanges, the

Initiative promotes what it describes as "common prosperity" across participating regions (Geneva.China, 2023). Within this expansive vision of global integration across more than 138 countries in Eurasia and Africa and encompassing over 60% of the global population, as well as roughly one-third of global trade and GDP, questions of social participation and development emerge as central concerns (WorldBank, 2018). In particular, the positioning of women as economic actors and beneficiaries of BRI-led cooperation reflects how gender has been incorporated into China's broader narrative of inclusive globalisation.

China has increasingly framed women's development as an integral component of the BRI. One explanation could be provided by looking at the domestic spheres of Chinese history trajectory and path to modernisation. Throughout the twentieth century, women's emancipation was constructed as inseparable from China's quest for strength and sovereignty, particularly in response to the perceived national humiliation of the so-called "Century of Shame" from the mid-nineteenth to mid-twentieth centuries (Frada, 2023). The condition of women was treated as a symbol of national modernity and often framed in urgent, crisis-driven terms: if women's status did not improve, or if the forces pushing them into prostitution were not addressed, the nation itself would collapse (Hershatter, 2007, p79). By contrast, the liberation of women was imagined as proof that China could become strong and modern, escaping both feudal traditions and the fragile sovereignty of semicolonial rule. Even before the founding of the People's Republic of China, the "woman question" was already used not only to criticise existing state structures but also, more broadly, to question Chinese civilisation itself. Within this narrative, the collective subject named "Chinese Woman" was entangled with the dominant idea of revolution, and thus "a feminist discourse that had long been an integral part of the modernity project in China" (Zheng, 2005, p2). Consequently, feminist rhetoric became embedded in state-led modernisation projects since Mao's reign in the mid 20th centuries, invoking the long-standing slogan "Funü nengding banbiantian" (妇女能顶半边天/Women can hold up half the sky), recasting women not merely as mothers or domestic figures but as active contributors to revolutionary transformation and economic development (Zhong, 2010, p227). Typically, women as consumers of modern consumer products and as child-bearers were key to eugenic improvements, scientific modernity, and the strengthening of the nation (Wu, 2020, p4). This state-endorsed vision of women as nation-builders has persisted into the twenty-first century.

At the 2015 United Nations Global Leaders' Meeting on Gender Equality and Women's Empowerment, President Xi Jinping declared that China would "do more to enhance gender equality as its basic state policy," and in 2020 Chinese official discourse again invoked the Mao-era slogan that women hold up half the sky, underscoring their central role in national progress and aligning gender equality with China's globalisation processes (Ministry of Foreign Affairs of the People's Republic of China, 2020). Yet several debates surrounding the efficacy of this policy remain unresolved. As a newly coined metaphor, "half the sky," or banbiantian 半边天, with an emphasis on women entering the work-force for "socialist construction" typically, did signify a fundamental change in women's social, cultural, and public position as a side effect (Zhong, 2010, p227). While socialist policies did expand women's participation in production, they did not eliminate the gendered burden of domestic labor or fully resolve entrenched patriarchal relations (Herchatter, 2019, p19). Similarly, Maoist gender equality was often pursued through state-directed labor mobilisation, meaning that women were "liberated" through labor, but on terms defined by the socialist state, and that the participation often operated within a top-down socialist framework rather than an autonomous feminist one (Spakowski, 2022, p137). Seen in this light, the BRI can be read as a contemporary extension of an older state logic that ties women's development to national modernisation and geopolitical ambition.

It is within this broader ideological and historical framework that the BRI can be understood. The Belt and Road Initiative (BRI) is built upon five foundational pillars: policy coordination, infrastructure connectivity, free trade, financial integration, and strengthened social ties (Rizwan et al., 2018, p7). Beyond its primary economic and commercial functions, the initiative serves as a bridge for cultural exchange and cross-civilisational learning. According to Ploberger (2017), the BRI also aims to foster regional stability and prosperity by bolstering infrastructure, healthcare, and employment opportunities to reduce poverty. Accordingly, in his address at the Belt and Road Forum, President Xi Jinping described the BRI as a project dedicated to advancing "inclusiveness," signaling that economic connectivity should also entail broader social participation (Belt and Road Forum, 2023).

To achieve the foundational pillars, the initiative has prioritised "small but beautiful" projects focused on localised agricultural and medical improvements, alongside a growing portfolio of green investment projects designed to enhance environmental sustainability. Notably, there has been a surge in healthcare prioritisation; BRI health sector investments in 2022 saw a 209% increase over the previous year. These targeted efforts have yielded measurable social outcomes, particularly for women's health. Statistics show that by 2017, the maternal mortality rate in BRI-participating nations had dropped by 15.34% compared to 2013 levels (Ploberger, 2017). Building on this narrative, scholars such as Mingying Zhu and Zhiren Hu argue that the BRI positions women as a vital force for "prosperity and vitality," emphasising their active integration into national and transnational economic development processes (Zhu & Hu, 2023). Through extensive cooperation agreements with 141 countries and 32 international organisations by November 2021, China has sought to construct an economic framework that it presents as conducive to expanding women's employment and educational opportunities. Evidently compared to 2013, the proportion of women with secondary education in BRI countries increased by 3.44%, while their incomes rose by 14.5% (Zhu & Hu, 2023). While it remains methodologically difficult to establish direct causation between the BRI's launch and improvements in women's socioeconomic indicators, these trends suggest that the Initiative's small- and medium-scale projects may have played a role in enhancing women's socioeconomic participation, and that gendered development has become an articulated dimension of China's BRI discourse and practice.

While the official Chinese discourse frames the BRI as a single, unified project promoting "inclusive" progress, its real impact is clearer when we look at specific regional implementations. The China-Pakistan Economic Corridor (CPEC) is a key example, showing how these broad ideas about development interact with local political situations and deeply rooted social structures.

2.2 The Transformation of Women’s Statuses observed in the China-Pakistan Economic Corridor (CPEC)

A prominent illustration of these developments is the China–Pakistan Economic Corridor (CPEC), a flagship project of the BRI. Designed to enhance connectivity between Pakistan, China, and Europe, CPEC has been described by some women’s rights advocates as a “game changer” in relation to women’s employment prospects. Job opportunities for women will increase tremendously owing to the forthcoming industrial cooperation under the CPEC, said Pakistan's Minister for Human Rights Shireen Mazari recently. Pakistan's official data show the CPEC has provided over 70,000 direct jobs locally since it was launched in 2013 (The State Council Information Office of PRC, 2019). However, before considering CPEC’s possible benefits for women’s employment, it is important to note that the corridor has generated extensive criticism in the literature on Pakistan’s internal politics and South Asian geopolitics. Far from being understood as a purely developmental initiative, CPEC is often analysed as a contested political project in which questions of extraction, security, and sovereignty are central. Writing on Balochistan, Kaur and Malhi argue that “CPEC has increased existential difficulties for the Baloch people” and describe the conflict as a struggle to defend local rights against “exploitation by the federal government” in conjunction with China (Kaur & Malhi, 2023, p95). This critique is tied to long-standing grievances that Balochistan’s strategic location and natural resources benefit outsiders more than local communities. In Virk’s study of CPEC’s security and developmental discourse, he notes that for many Baloch, “sudden bursts of investment are signs of foreign invasion and more exploitation,” while local fears persist that the corridor could deepen demographic marginalisation rather than reduce it (Virk, 2020, p49) . These tensions have also translated into violence: Baloch militant groups have repeatedly targeted Chinese workers and CPEC-linked sites, including attacks around Gwadar, reflecting the extent to which some separatists view the corridor as an instrument of external control rather than local development. At the regional level, CPEC has likewise altered South Asian geopolitical calculations. Zahid Hussain argues that China’s growing involvement in Pakistan reflects Asia’s emerging geopolitics and realignment of forces, while also warning that “there is a risk that CPEC may become another point of contention between the two South Asian nuclear powers,” especially given Indian objections to the corridor’s route through disputed territory and concerns over Gwadar’s possible strategic use in the Indian Ocean (Hussain, 2017, p58).

Women’s participation in paid work remains structurally limited in Pakistan: the female labor force participation rate was only 25.4 percent in 2020, with much of the increase concentrated in unemployment and unpaid agricultural work rather than stable formal employment (WorldBank, 2025, p24). Against this background, some CPEC-linked projects have been presented as opening new opportunities for women in sectors that are not traditionally feminised. The expansion of opportunities into industrial and technical fields has diversified women’s professional roles and strengthened their economic contributions within households while empowering them with a more dignified status as productive family supporter (Rashid.A, 2019). Yet the evidence should be treated cautiously. Much of the literature on CPEC emphasises that promised employment gains for local communities have often been uneven, poorly documented, and shaped by broader governance and security problems rather than broadly shared developmental outcomes. A recent critical assessment argues that, instead of delivering its ambitious promises, CPEC has exposed deep governance challenges, including institutional fragility and military dominance in policymaking (Samad, 2025, p2). More specifically, Chinese workers and CPEC sites have been frequent targets of militant violence in Pakistan, especially in Balochistan, where separatist groups oppose the corridor and have carried out repeated attacks on Chinese nationals (Mclaughlin, 2023, p111).

Within this contested setting, case-specific initiatives nonetheless suggest that some women have gained access to new forms of paid industrial work. In the Thar coalfield, for example, Reuters reported that women were taking up truck-driving jobs that had previously been reserved for men (Reuters, 2017). Sindh Engro Coal Mining Company later stated that more than 50 women had been trained and hired as dumper truck drivers, presenting the program as part of a broader effort to create employment for Thari women (Abbas, 2022). These initiatives do not demonstrate a general transformation of women's employment under CPEC, nor do they prove that women benefit disproportionately from Chinese-backed projects compared with the wider Pakistani workforce. However, they do show how specific corporations and local development actors frame women's employment as evidence of CPEC's social value. Reception in Pakistani society also appears conditional rather than uniformly positive: survey-based research suggests that local support for CPEC increases when communities perceive tangible benefits such as employment, income, and accessibility, and weakens when such benefits are absent or unevenly distributed (Kanwal et al., 2020). Taken together, these examples suggest that CPEC may create selective openings for women's economic participation, but that such gains remain localised, politically contested, and embedded in a broader development model whose benefits are highly uneven.

The contested nature of CPEC, as defined previously by extraction and security concerns in Balochistan, serves as the necessary setting to analyse its gendered impacts. Beyond its primary function as a $62 billion infrastructure network linking the port of Gwadar, in the province of Balochistan, to the northern regions of China, as well as providing the country with strategic access to a deep-sea port at the entrance of the Persian Gulf, the corridor has unintentionally emerged as a site of socioeconomic transition for women. However, to characterise the CPEC as a "vector for transformation", it is important to add nuance using Pakistan's structural landscape, instead of uncritically adopting state-led success stories.

To evaluate these shifts, CPEC's physical infrastructure must be put in context with the reality of a social architecture framed by patriarchal norms and structural inequalities. Historically, women have been relegated to the margins of public and political life, considerably limiting any of their participation in collective spheres (Faraz, 2017, p.1). Women participate minimally, if at all, in the public sphere, which increases their vulnerability to violence, exploitation, and abuse, particularly in crisis situations (Faraz, 2017, p.2). A factor that has further exacerbated these restrictions is violent extremism, as shown during the influence of the Tehrik-i-Taliban Pakistan (TTP), particularly during their peak activity in Khyber Pakhtunkhwa province between 2007 and 2014. During this period, women were prohibited from working and from leaving their homes without being accompanied by a male relative, which affects not only their access to healthcare but also household incomes (Faraz, 2017, p.2).

Even though the TTP's stronghold has been put to an end in the region, the normative legacy of this era still persists. In fact, the "opportunities" created by the CPEC, such as access to new labor markets or safer urban transit, are still constantly mediated by gender discrimination and a lack of political representation. In this regard, Faraz emphasises that strengthening women's agency, consolidating their voice in peace and security matters, and reducing their vulnerability are imperatives inseparable from any lasting transformation (Faraz, 2017, p.2). The CPEC therefore operates in an environment where structural opportunities for women remain deeply constrained by social and political norms that infrastructure alone cannot dismantle.

While official BRI discourse often presents CPEC as an intentional way to support inclusion, the evidence shows something different. Its impact on women's economic opportunities mostly comes as an unintended result of building physical infrastructure, not from actual policies designed with gender in mind. In this context, the corridor acts as an unexpected driver of change: by reducing practical problems like power shortages and poor transport, it has helped some women get around the limits imposed by a male-dominated labor market.

In urban centers like Lahore, the Orange Line Metro, a flagship CPEC transport project, illustrates how physical connectivity can reduce what is called the "harassment tax" that often keeps women out of the formal workforce. By offering safe, affordable, and women-only spaces, the metro has helped thousands of women to access educational and professional hubs that were previously inaccessible, either because ride-sharing was too expensive or the safety risks of overcrowded traditional buses (Hamid, 2025). This change reflects a practical improvement in women's mobility, rather than a change in ideas or attitudes.

In the northern areas of Gilgit-Baltistan, the improvement of the Karakoram Highway has greatly changed the local tourism economy. Improved road connectivity has integrated remote valleys to national and international travel, creating a "geographical opening" for female entrepreneurship. For example, initiatives like the Bozlanj café in Hunza Valley, run entirely by women, demonstrate a transition from informal, unpaid agricultural labor to the formal service sector (Hamid, 2025). However, these cases remain localised and often depend on the more open culture of the Ismaili community in Hunza. This suggests that infrastructure alone may not bring the same results in more conservative parts of Pakistan.

In Punjab's industrial region, the impact is linked to more reliable electricity. CPEC-linked power projects have reduced the frequency of "load-shedding" (power outages) in textile cities like Faisalabad. This stability has secured steady jobs for semi-skilled women working in mills and at the Allama Iqbal Industrial City, where industry plays an important role in bringing women into the workforce.

Ultimately, these transformations show that while roads, electricity, and public transportation can facilitate an "unexpected" improvement in women's economic status, these gains are fragile. They act more like practical solutions within a system that is still largely patriarchal, reflecting a development model that prioritises physical connectivity over systemic social reforms.

3 Women as the 'Invisible Social Infrastructure' of the BRI: Exploitation and Forced Circulation

3.1 Economic Corridors as Trafficking Routes: The Hidden Face of Bride Trafficking along the CPEC

Whilst the BRI places an emphasis on the transformation in women's lives within a gendered and economic globalisation, this outlook on the initiative remains incomplete. Women's visibility is largely understood through their participation in infrastructure and healthcare schemes. However, this framing risks obscuring the informal mechanisms under which women become integrated into the initiative. The extent of female empowerment thus becomes structurally constrained along the BRI's economic corridors – creating the possibility for exploitation.

At its inception, the BRI was presented by President Xi Jinping as a project intended to "promote common development and prosperity" and to deliver tangible benefits to participating populations, to be inclusive and mutually beneficial. Yet a growing body of scholarship points to a gap between this language of mutual gain and the uneven social outcomes of implementation. Hope Marshall argues that the BRI's material benefits have accrued "predominantly" to men, in part because the initiative lacks meaningful gender-specific policy design and tends to reproduce existing hierarchies rather than correct them (Marshall, 2021). This discrepancy is especially striking given China's own gender inequalities. In the World Economic Forum's 2021 Global Gender Gap Report, China ranked 107th out of 156 countries overall and 118th on political empowerment, with women making up only 3.2 percent of ministers and 24.9 percent of parliamentarians (World Economic Forum, 2021). The weakness of women's representation is even clearer at the top of the political system: after the 20th Party Congress in 2022, there were no women among the 24 members of the Politburo and none on its seven-member Standing Committee, prompting concern from the UN Committee on the Elimination of Discrimination against Women (Master, 2023). In that sense, the BRI's promise of inclusiveness is undermined not only by its external implementation, but also by the domestic political structure from which it emerges, where women remain underrepresented in the senior decision-making arenas that shape both governance and foreign policy (USCC, 2023).

The intensification of Chinese migration along the CPEC has facilitated a dark secondary market: systematic marriage trafficking involving Pakistani women and Chinese men. Between 2017 and 2019, Pakistan's Federal Investigation Agency (FIA) identified at least 629 victims of this "bride trafficking" (Afzal, 2022, p. 3). This phenomenon is linked to China's domestic "marriage squeeze": a demographic crisis resulting from policies like the one-child rule and sex-selective abortions, which created a surplus of approximately 34 million men (Afzal, 2022, p. 4).

Traffickers specifically targeted women from Pakistan's marginalised Christian minority, a community that already faces strong socio-economic exclusion and has limited legal protection within Pakistan's religious and social hierarchy. Because many of these families are trapped in generational poverty and lack institutional support, they are more easily convinced by "marriage agencies" promising financial stability. Families were often given about $2,820, a significant sum in this context, along with false promises of monthly payments (Afzal, 2022, p. 2). The involvement of Chinese men is directly tied to the labor model of the BRI, which often rely on "exclusive" Chinese workers rather than local labor. Many of these men were workers on CPEC projects or exploited legal loopholes in business visas, which became more common as migration increased. As Afzal (2022) explains, they often hid their activities behind what looked like legitimate CPEC-related travel, using the rise in cross-border movement to mask the illicit transport of women (p. 4).

Once taken to China, many women reported serious abuse, including forced pregnancies and prostitution (Afzal, 2022, p. 2). Similar patterns have been seen in other BRI countries, like Myanmar and Cambodia, where development of "Special Economic Zones" and casinos have also been linked to the trafficking of local women to China. This shows a wider regional problem, where economic expansion happens faster than the protection of human rights (Afzal, 2022, p. 3).

The most revealing aspect of this case, however, is the systemic cover-up. Although 52 Chinese nationals were arrested in 2019, the majority were acquitted or released on bail following diplomatic pressure. As the UNPO (Unrepresented Nations and Peoples Organisation, 2022, p.14) report highlights, the intense securitisation and political pressure to protect the Sino-Pakistani alliance lead to the silencing of investigators and journalists. This censorship underlines how the rights of vulnerable women, especially those from religious minorities, are often treated as less important than political and economic partnerships. In this framework, vulnerable women become the "invisible social infrastructure" of globalisation: their bodies and domestic lives are instrumentalised to facilitate the smooth functioning of transnational corridors, while they themselves remain unprotected and easily ignored. However, these seemingly positive transformations also reveal a deeper contradiction, because the multiple processes that enable the economic integration of women simultaneously trap them in new structures of invisibility and exploitation along the corridors of the New Silk Roads.

3.2 The Exportation of the Notion of Care as a Development Strategy: The Structural Dependency of the Philippines with Outsourced Reproduction

In the Philippines, female migration cannot be understood solely as an economic strategy; it constitutes a national technology of externalised reproduction, whereby the state strategically organises and exports reproductive labor-care, emotional support, and domestic work beyond its border in order to sustain both foreign social systems and its own domestic stability through remittance flows. This implies that social reproduction is no longer territorially bounded but redistributed across transnational circuits, where migrant women function as key intermediaries in sustaining both global care deficits and the state's own development model, effectively transforming intimate labor into a mechanism of macroeconomic governance. Extending Parreñas's (2000, 2015) "international division of reproductive labor," it is possible to conceptualise the Filipino diaspora as an offshore reproductive infrastructure. The State does not simply export labor; it exports the capacity to support the social reproduction of other societies while simultaneously financing its own through remittances - this support operates through the substitution of local reproductive labor shortage : migrant women take over essential care functions-childcare, eldercare, and household maintenance - in host societies, thereby enabling local women to enter or remain in the labor market and allowing households and economies to sustain productivity without restructuring their own welfare or care systems. Care thus becomes a geoeconomic resource. The notion of care is often defined by feminist scholars as the different sets of activities and relations involved in maintaining and reproducing daily life, essential to the functioning of both households and economies. In host societies, migrant women assume these functions in connected places where local care systems are insufficient, thereby compensating for structural deficits without requiring institutional reform.

"Long-distance mothering" (Parreñas, 2001 p.361) can be rethought as a distributed motherhood, where the maternal function is spatially fragmented but symbolically consolidated. The Filipino family becomes a multi-sited domestic unit, structured by continuous financial and emotional transfers. This family modularity is not simply an effect of migration; it constitutes a regime of intimate governance. Separation becomes an institutionalised norm of social reproduction.

Guevarra's analyses (2009, 2010) take this further: the Philippine state presents its migrant women as "heroines," transforming vulnerability into moral capital. This process can be described as compensatory heroization: a discursive strategy that converts structural precarity into a national resource. Vulnerability is not eliminated; it is managed, integrated, and valorised. The result is a political economy of endurance, where women's capacity to withstand distance, loneliness, and instability becomes a pillar of development. Applied to the BRI, this dynamic suggests that the expansion of economic corridors is indirectly sustained by gendered labor regimes, where women's managed vulnerability and endurance function as an invisible support system of global connectivity. This is made possible through the expansion of transnational labor mobility, the intensification of care deficits in rapidly transforming economies, and the reliance on migrant women to absorb the social costs generated by large-scale infrastructural development.

These dynamics reveal a specific form of power: a transnational reproductive power. Far from being peripheral, the Filipino female diaspora functions as a stabilising mechanism for global capitalism, absorbing the social costs of international mobility. Contemporary connectivity relies not only on material infrastructure but also on this externalised affective architecture that maintains the coherence of social systems across distance.

However, this reproductive power does not operate in a vacuum; it reconfigures sovereignty itself. What emerges in the Philippine case is a form of delegated sovereignty, in which the state partially relocates its responsibility for social protection onto the bodies of migrant women. Remittances substitute for public social protection mechanisms, and family resilience replaces state redistribution. This dynamic can be conceptualised as a providential substitution based on remittances: a development model where financial transfers at the household level compensate for institutional underinvestment. In this configuration, migration is not a temporary safety valve, but a structural pillar of national governance.

Furthermore, this offshore reproductive infrastructure generates what can be called regimes of affective remittances. Financial transfers are inseparable from emotional obligations, moral expectations, and symbolic enactments of sacrifice (Parreñas, 2001; Hochschil 2000). Migrant women do not simply send money; they transmit what Levitt (1998) defines as "social remittances" (p.927) - narratives of devotion, resilience, and responsibility that reinforce the very legitimacy of the migration system. Through these effective regimes, the diaspora supports not only modes of consumption but also a moral economy that normalises prolonged separation. Emotional labor thus becomes a mechanism of ideological reproduction.

This normalisation leads to a temporal reconfiguration of social life. Migration is rarely temporary in practice; it evolves into circular or prolonged trajectories that extend over decades. We can therefore speak of suspended domesticity: a condition in which family life is constantly deferred while being continuously maintained remotely. Domestic stability is performed rather than shared. The home persists as a project, rather than as a shared space. In this suspended domesticity, women become guardians of continuity, anchoring identities across borders even as physical presence dissolves.

On a global scale, this system enables what can be described as asymmetrical reproductive integration. Host societies benefit from imported care work without fully integrating migrant women into effective social citizenship. At the same time, the Philippines integrates into global markets by exporting labor while externalising the social risks borne by its citizens abroad. Integration is thus unequal: economic inclusion and social exclusion coexist. The diaspora becomes both indispensable and disposable.

This duality underscores the ambivalent nature of transnational reproductive power. It confers strategic importance on Filipino women within global care networks, while simultaneously maintaining them in a state of structural precarity. Agency is exercised through endurance, negotiation, and adaptation rather than structural transformation. The infrastructure they embody is resilient yet fragile, sustained by individual sacrifice rather than institutional guarantees.

Ultimately, the Philippine case reveals that global connectivity rests on a regime of externalised social reproduction that blurs the lines between economics, intimacy, and governance. Migration is not simply a movement; It constitutes an infrastructural condition of contemporary capitalism. By conceptualising the Filipino diaspora as an offshore reproductive infrastructure sustained by compensatory heroization, regimes of affective remittances, suspended domesticity, and providential substitution based on remittances, it becomes possible to grasp the extent to which the global economy depends on intimate arrangements of labor that remain politically invisible. The stability of international systems thus rests on a gendered architecture of endurance, neither accidental nor peripheral, but structurally inscribed in the organisation of transnational development.

This externalised reproductive architecture invites a rethinking of dependency within the framework of the BRI. Rather than reflecting solely an economic reliance on remittances, it reveals a systemic dependence on gendered forms of resilience that sustain the social conditions of transnational connectivity. In the Philippine case, this takes the form of a deferred temporality embedded within BRI-related mobility patterns, where the promise of upward mobility is continuously projected into the future, while the present is sustained by the ongoing sacrifice of migration. This dynamic produces what may be conceptualised as sacrificial sustainability within BRI connectivity: a model in which the stability of economic corridors is indirectly maintained through the intimate instability of transnational family structures. In this sense, the Filipino female diaspora is not merely a labor resource, but a constitutive element of the social infrastructure that underpins the functioning of BRI-linked globalisation.

4 Conclusion

In light of the above, this research highlights that the Belt and Road Initiative facilitates a gendered globalisation that is inherently partial and uneven.While women play a key role in making these global connections work, they are often not seen or properly valued. This study conceptualises women as the "invisible social infrastructure" of the BRI, showing that global trade depends not only on money and physical projects, but also on important forms of work done by women that are often ignored.

This globalisation creates a complex phenomenon characterised by a double dynamic. On one hand, new infrastructure can help women by giving them better access to jobs, safer movement, and a place in the formal economy. On the other hand, it facilitates new forms of exploitation and constraint, such as trafficking, unstable working conditions, and the pressure on women to take on care work, often far from home. These changes are linked to broader global processes, like sending care workers abroad and the impact this has on families.

However, there are important limits remaining. Gender is not fully considered in official BRI policies. While women are increasingly included as economic actors, they remain largely excluded from the political decision-making processes that shape these corridors. Thus, the role of women in the BRI is shaped by an economic system that prioritises capital over social reform. This study underscores the failure to integrate gender as a fundamental pillar rather than an unintended side effect.

In the end, this research argues that to really understand global connections, we need to think about infrastructure in a broader way, not just roads and ports, but also the social and care work that keeps these systems running. Such a shift in perspective is essential for future studies to address the persistent gap between economic participation and genuine gender equality.

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ASSESSING THE FEASIBILITY AND IMPORTANCE OF AN EU-ASEAN FTA AMIDST PAST FAILURES AND THE CONTEMPORARY GEOPOLITICAL CONTEXT

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Sciences Po

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Abstract

In 2007, the European Union (UN) and the Association of Southeast Asian Nations (ASEAN) attempted to negotiate a regional free trade agreement (FTA). Still, negotiations eventually fell through due to divergent positions within ASEAN. However, amid the current backdrop of economic volatility and geopolitical uncertainties, regional trade agreements are on the rise. As two of the world's largest economic regions, and given the current context and historical accumulation, this paper will aim to answer whether an EU-ASEAN FTA is possible, considering today's geopolitical context and past failures. From key economic theories, the main findings are that a region-to-region FTA will be beneficial for both the EU and ASEAN. This paper also analyses the political hurdles the EU and ASEAN faced in prior negotiations, the institutional differences between the two regional blocs, and lessons from similar negotiations with other countries. Finally, this paper brings these two aspects together to discuss how, given the current global context, past political hurdles must be overcome for the EU and ASEAN to reap the economic benefits of a region-to-region FTA.

Keywords: Free-trade Agreement (FTA), European Union (EU), Association of Southeast Asian Nations (ASEAN), trade diversification, geopolitical tensions

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1 Introduction

In today's increasingly volatile global economy, one would typically expect countries to turn inwards for protection, resulting in reduced global trade. Interestingly, states are turning towards regional trade blocs as a strategy for resilience, promoting region-to-region trade. As shown in the DHL Global Connectedness Report of 2026, despite heightened geopolitical tensions, the world is not deglobalising; rather, states have become more regionally connected through trade (Altman & Bastian, 2026). As regional free trade agreements (FTAs) become commonplace, it is almost surprising that the EU and ASEAN, two of the most institutionalised regional blocs in the world, do not have an FTA between them. To date, Singapore and Vietnam remain the only two ASEAN countries to have signed FTAs with Europe, largely due to their respective economic importance as financial hubs or manufacturing hubs, but an FTA between the EU and ASEAN as a whole has never been signed. In fact, the two regional blocs attempted to negotiate an EU-ASEAN FTA in 2007, but the negotiations fell through. However, amidst the volatility in today's economy, there lies great incentive and potential for the two regional blocs to establish strong trade relations. This paper will thus analyse whether an EU-ASEAN FTA is possible in today's geopolitical context, considering its past failures.

This paper will explore the feasibility of an EU-ASEAN FTA in three parts. The first part outlines why free trade between the two regions should take place in theory by giving concrete evidence of what the two blocs are currently trading and the rudimentary attempts so far. This is done by showing the benefits of free trade for both parties, the existing trade relationship between the EU and ASEAN, and the existing bilateral trade agreements between the EU and ASEAN states. The second part looks at why this theoretical framework of the economic benefits has not come into fruition in the real world. This can be attributed to three key reasons: the political differences between the EU and ASEAN, internal civil fractures within the EU, and recurring historical patterns of failed trade agreements between the EU and ASEAN states and other regions. Finally, the third part analyses changes in both current economic and political situations that make an FTA more pertinent today, especially the need for trade diversification amidst trade wars and tariffs.

2 Economic Potential

2.1 Benefits of Free Trade

Firstly, it is crucial to understand why free trade agreements (FTAs) have been widely lauded for the economic advantages they bring to the countries involved. The most notable benefit of international trade is illustrated by the theory of comparative advantage (Ricardo, 1819). Comparative advantage is based on the principle that a particular economy can inherently produce a good or service at a lower opportunity cost than another economy. This is due to countries possessing different factor endowments, such as natural resources and manpower. In today's context, this theory calls for free trade among countries, as countries trade goods they can produce more cheaply or more easily than others. An extension to this that introduces more advantages of free trade is the "New Trade Theory" (Kruger, 2000). With a larger market, firms expand their economies of scale and increase their returns to scale. Simultaneously, firms in different economies produce differentiated products, promoting monopolistic competition and intra-industry trade. Hence, even countries that produce similar goods can benefit from trade by offering consumers a variety of choices. A similar argument is advanced by economist Bhagwati, emphasising the role of trade liberalisation in economic growth through increased exports (Bhagwati, 2021). He also touches on how a country's consequent increase in growth can lead to reduced poverty and increased overall welfare for the population. Given the benefits countries stand to gain from trade liberalisation, FTAs are often praised as a worthwhile form of economic cooperation that benefits all stakeholders.

As seen in Figure 1 below, electronics and electrical machinery are one of ASEAN's largest export sectors, accounting for about 38% of ASEAN's total exports as of 2022. Other critical exports range from nuclear reactors and machinery to textiles, as well as liquefied natural gas coming from Malaysia and Indonesia (ASEAN, 2025). Meanwhile, Figure 2 shows that the EU's major import sectors include mineral fuels and oils, electronics and electrical equipment, machinery and nuclear reactors (UN COMTRADE, 2024). Here, we can see a match between ASEAN exports and the EU's imports.

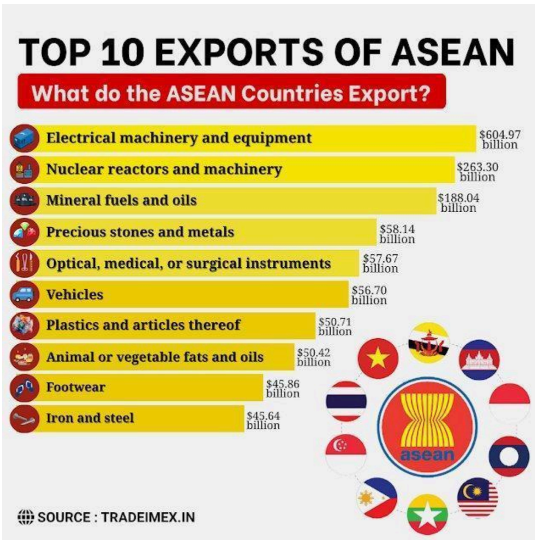

Figure 1: Top Exports of ASEAN (Tradeimex.in, 2025)

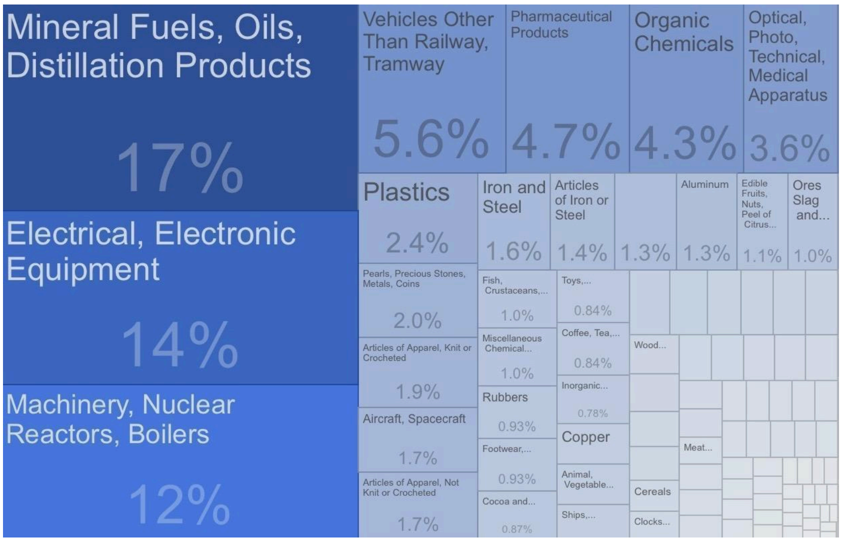

Figure 2: EU Imports by Category (UN COMTRADE, 2024)

Similarly, ASEAN's top imports comprise industrial machinery, transport and electrical equipment, as well as chemicals and pharmaceuticals (ASEAN Economic Community, 2025), while the EU mainly exports machinery and industrial equipment, vehicle components, and chemicals and pharmaceuticals (UN COMTRADE, 2024), as seen in Figure 3. Again, with this observed match between the EU's main exports and ASEAN's primary import sectors, it is evident that the two regions complement each other's trade needs. An FTA between the two regions can thus help fill in their respective gaps in economic goods and resources, benefiting both regions thanks to their individual comparative advantages.

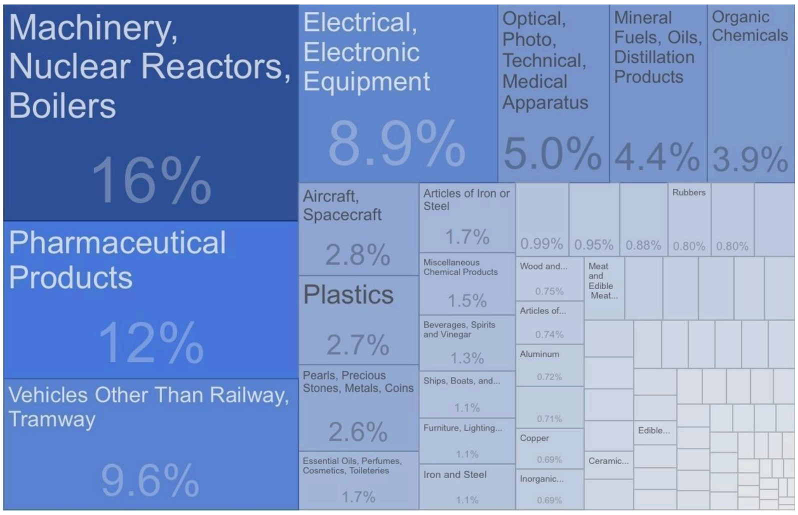

Figure 3: EU Exports by Category (UN COMTRADE, 2024)

2.2 EU and ASEAN's Trade Relationship

Seeing that countries naturally stand to gain from free trade, it is thus favourable for the EU and ASEAN, two of the world's largest economic regions, to engage in it. According to existing literature, both regions already engage in significant trade with each other; hence, it would be rational for them to further facilitate trade by creating an FTA. ASEAN claims the title of the EU's third-largest trading partner after China and the US, while the EU is similarly ASEAN's third-largest trading partner (EU, 2025). In 2024, the EU reported that its goods trade with ASEAN totaled €258.8 billion. Of this sum, €94.3 billion was from EU exports to ASEAN, while €164.5 billion was recorded in imports from ASEAN (Shofa, 2026).

EU trade in goods with ASEAN countries, 2011 and 2021

€ billion and %

	Exports			Imports			Total trade (exports+imports)			Trade balance	
	2011	2021	Average annual growth rate (%)	2011	2021	Average annual growth rate (%)	2011	2021	Average annual growth rate (%)	2011	2021
Vietnam	4.8	10.6	8.2	11.3	38.5	13.1	16.1	49.1	11.8	-6.4	-27.8
Singapore	23.2	27.3	1.6	15.7	15.6	0.0	38.8	42.9	1.0	7.5	11.7
Malaysia	10.4	11.8	1.3	16.1	29.2	6.2	26.4	40.9	4.5	-5.7	-17.4
Thailand	10.0	13.3	2.9	14.9	22.0	4.0	24.9	35.3	3.5	-4.9	-8.7
Indonesia	6.7	8.0	1.8	14.9	16.7	1.2	21.6	24.8	1.4	-8.2	-8.7
Phillipines	3.7	7.1	6.7	4.7	8.1	5.7	8.4	15.2	6.1	-1.0	-1.1
Cambodia	0.2	1.0	18.8	1.1	3.5	12.1	1.3	4.5	13.3	-0.9	-2.5
Myanmar	0.1	0.3	8.3	0.1	2.2	33.6	0.3	2.6	25.3	0.0	-1.9
Laos	0.2	0.2	2.8	0.1	0.3	6.7	0.3	0.5	4.7	0.0	0.0
Brunei	0.4	0.1	-10.0	0.0	0.0	-3.7	0.4	0.1	-9.9	0.4	0.1

Source: Eurostat (online data code: Comext data code : DS-018995)

Countries are sorted on the value of total trade (exports + imports)

eurostat

Table 1: EU trade in goods with ASEAN countries, 2011-2021 (Eurostat, 2021)

Table 1 shows the exports, imports, and trade balances for goods trade between the EU and ASEAN countries. ASEAN remains a close trading partner of the EU, as seen in total trade with countries like Vietnam and Singapore, at €49 billion and €43 billion, respectively. Trade between the two regions is also expected to grow, given the relatively high growth rates in countries like Myanmar (25.3%) and Cambodia (13.3%).

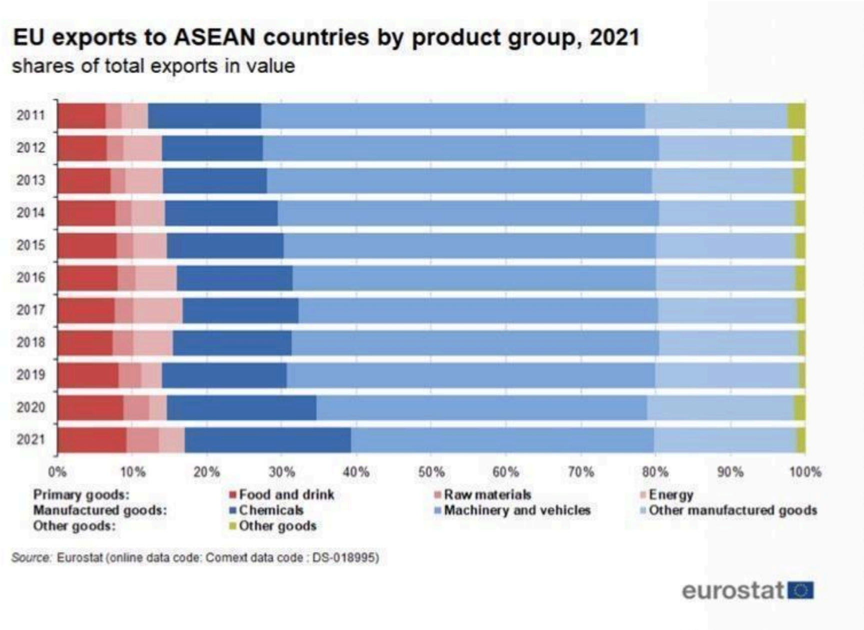

Figure 4: EU exports to ASEAN countries by product group (Eurostat, 2021)

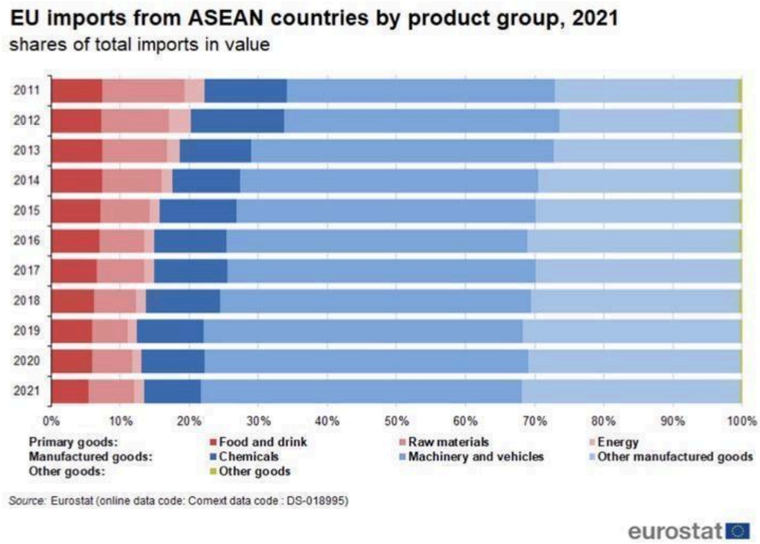

Figure 5: EU imports from ASEAN countries by product groups (Eurostat, 2021)

Focusing on specific trade sectors between the EU and ASEAN, the EU's main exports to ASEAN are capital-intensive and high-tech, like machinery and transport equipment, chemicals and pharmaceuticals, and advanced technology (Figure 4). Meanwhile, ASEAN primarily exports labour-intensive and resource-based goods such as electronics and electrical machinery, textiles, and rubber to the EU (Figure 5) (European Commission, 2025). Additionally, the EU is the third-largest investor in ASEAN countries, with its 2023 foreign direct investment (FDI) stock in ASEAN amounting to €372.7 billion. Recently, ASEAN investment in Europe has also been increasing steadily, with a total stock of over €336.8 billion in 2023.

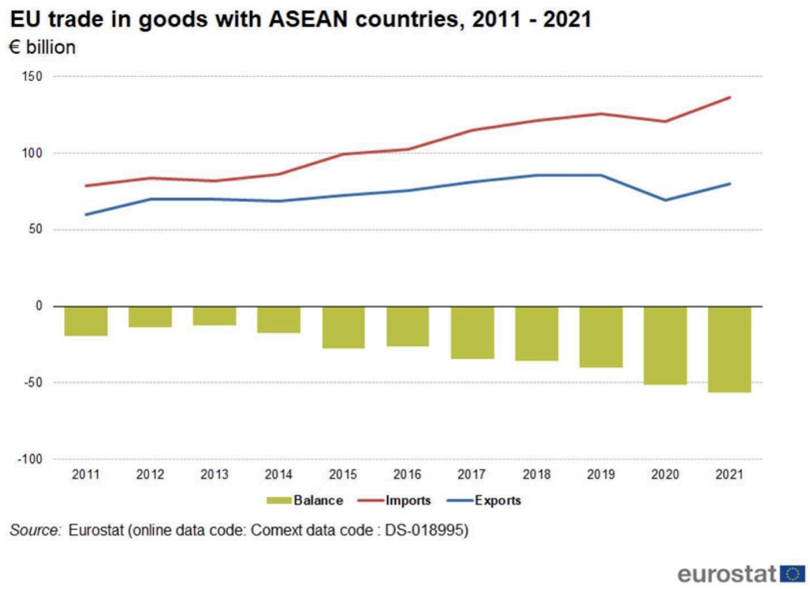

Figure 6: EU trade in goods with ASEAN countries, 2011-2021 (Eurostat, 2023)

From Figure 6, excluding the economic shock and decrease in trade due to the COVID-19 pandemic in 2020, we can see that the EU and ASEAN have a steadily growing trade relationship. In fact, in recent years, this trade relationship has been growing exponentially. These data imply a close trading relationship between the two regions, which further supports the feasibility of an FTA that benefits producers and consumers and encourages trade with reduced barriers.

Yet, some literature emphasises that, despite the strong existing trade relationship, there remains a substantial gap between potential and actual trade between the two regions (Kabir and Salim, 2011), indicating enormous untapped trade potential. The undiscovered trade potential is estimated at between 40% and 50%, highlighting the large potential for a free trade agreement between the two regional blocs to further expand trade and reap gains in trade, investment, production, and welfare.

2.3 Existing Bilateral FTAs between the EU and ASEAN countries

The current EU-Singapore and EU-Vietnam FTAs demonstrate that it is possible for FTAs to exist between the EU and ASEAN countries, while underscoring the benefits of doing so.

The EU-Singapore Free Trade Agreement (EUSFTA) was the first bilateral EU FTA in Southeast Asia. It eliminated virtually all customs duties between the EU and Singapore, and opened up markets for EU and Singaporean service providers and government procurement (Elms, 2017). Similarly, the EU-Vietnam Free Trade Agreement (EVFTA) eliminated about 99% of tariffs between the EU and Vietnam and is considered one of the most ambitious FTAs the EU has signed with a developing country (European Commission, 2019).

Since the implementation of these FTAs, trade between the EU and Singapore and the EU and Vietnam has grown significantly on both sides (European Council, 2022), promoting economic growth and access to new markets. At the same time, economies can also exchange services and knowledge, enabling them to learn from one another and strengthen their own production capabilities and human capital, a significant benefit of FTAs, especially for developing countries in ASEAN. Using these existing FTAs as models can thus pave the way for greater regional cooperation in the future.

3 Political Hurdles

Although FTAs are a highly beneficial strategy in theory for both parties, there are unfortunately difficulties in practice that hinder the implementation of an FTA between the EU and ASEAN. Understanding these challenges is pertinent to finding solutions to overcome them.

3.1 The Divergence of Institutional Policies between the EU and ASEAN

A major reason for the absence of an FTA between the EU and ASEAN is that their fundamental institutions do not align. ASEAN’s institutional architecture can be described as “soft institutionalism” (Acharya, 2001). This is characterised by informality, pragmatism, nonconfrontational bargaining, and consensus-building (Acharya, 1997), in which individual ASEAN countries have the freedom to decide whether to implement policies recommended by the entire ASEAN body. On the other hand, the EU is built on hard regionalism, which adopts more formal structures centred on supranational bodies and a highly legalised approach (Moldashev & Qoraboyev, 2018). The process by which the EU negotiates its FTA agreements entails strict human rights, labour rights, and competition policies. All of these demand a binding and legalised approach, which is incompatible with ASEAN’s way of negotiating for voluntary, consensus-driven cooperation. For ASEAN governments, especially those that lean towards autocratic regimes, EU-style conditionality is perceived as intrusive and politically sensitive. This difference in how the two regions operate can hinder potential trade negotiations between them.

Another factor is the inherent heterogeneity of ASEAN. Unlike the EU, which comprises countries with relatively similar capacities operating within a harmonised framework, ASEAN is an amalgamation of countries with different political regimes and levels of development. For example, ASEAN members such as Singapore, Malaysia, and Thailand, which can be said to have higher state capacity than other ASEAN members, are more “applicable with the EU experience” (Jetschke & Murray, 2012). This is because their developed state capacity aligns with the EU model of FTAs, which emphasises greater accommodation for more industrialised states. Compared with the still-developing economies of other ASEAN members, which have lower capacity, these internal differences make it more challenging for ASEAN to formulate a unified negotiating position that satisfies both its most advanced and its least developed members. Furthermore, another structural constraint which highlights ASEAN's heterogeneity is ASEAN's wide variation in political stability. The contrast is prevalent between highly stable states such as Singapore and deeply unstable ones such as Myanmar. For the EU, which negotiates FTAs that rely on uniform governance standards, this variation makes it extremely difficult to treat ASEAN as a single, cohesive negotiating partner. The presence of a sanctioned military regime within the bloc directly obstructs the EU's ability to pursue a region-to-region FTA. This is because a country under military rule cannot meet the EU's binding commitment to human rights and labour protection. Hence, this political and cultural heterogeneity that exists in ASEAN limits the fit of the EU, which is composed of member states that are relatively culturally and politically homogenous within their established supranational institutions.

3.2 Disagreements between the EU and its Citizens

Beyond the differences in institutional policies between the EU and ASEAN, another reason for the lack of FTAs can be attributed to public scepticism of the European population towards certain trade agreements. A prime example of this is the Mercosur case, which was widely accepted politically but met with resistance from European citizens and NGOs.

This dispute arose from environmental implications associated with the EU-Mercosur Association Agreement (EUMAA). As the EU integrates climate objectives into its trade policies, "there (was) widespread recognition that trade policy cannot work in isolation from environmental policy" (Harrison & Paulini, 2024). Thus, when negotiations with Mercosur were underway, and Amazon deforestation was accelerating, this led to strong disputes between the European and Mercosur countries. This is because a perception arose that this agreement would harm the environment. More specifically, "Coalitions of civil society actors in both the EU and Mercosur countries, as well as 600 environmental scientists" (Harrison & Paulini, 2024) disregarded the EUMAA to improve the environmental implications of the deal. They expected the EU to remain true to the European Green Deal.

Another difference in dialogue between the EU and its people arose because of the unfair competition European farmers would face. This arose from the same difference between the institutions and ASEAN that was mentioned earlier in this paper. Mercosur was able to produce under less strict environmental, labour and food safety laws, which made their production costs much lower, posing a threat to European farmers whose products were sold at higher prices.

Product	Current imports from Mercosur (import duties)	Additional quotas in agreement (import duties)
Beef	200,000 tonnes	99,000 tonnes (7.5 %)
Poultry	400,000 tonnes	200,000 tonnes (0 %)
Pork	unknown	25,000 tonnes (€ 83 /tonne)
Egg-equivalent	unknown	6,000 tonnes
Sugar	180,000 tonnes (€ 98/tonne) from Brazil	remains: 180,000 tonnes (0 %) from Brazil 10,000 tonnes from Paraguay
Bioethanol	unknown	650,000 tonnes (partly without duties)
Rice	unknown	60,000 tonnes (0%)
	Current exports to Mercosur	**Additional quotas**
Cheese	unknown	30,000 tonnes
Milk powder	unknown	10,000 tonnes
Baby milk powder	unknown	5,000 tonnes
Pork	20,000 tonnes	fully liberalized

Table 2: Arrangements on agriculture and livestock farming (Middeldrop et al., 2022)

The table above compares current imports from Mercosur with those resulting from the agreement. It more notably highlights that the EU is currently importing large quantities from Mercosur as is, and that the additional quotas this agreement allows would undercut European farmers and put pressure on them to make their prices more competitive. Their mobilisation was also amplified by concerns about lower food safety standards, animal welfare laws, and the perceived unfairness of allowing imports from countries with weaker environmental regulations.

Hence, the Mercosur case is a prime example of the strength of EU citizens' voice, which heavily impacts the outcomes of trade agreements. This also signals that any future EU trade agreements, especially those with ASEAN, may be affected by regulatory frameworks that differ significantly from the EU's, depending on state capacity. EU governments must, hence, understand sustainability and agricultural sensitivities, or risk the same outcome as in the Mercosur case in future negotiations with ASEAN.

3.3 Recurring Patterns of Unsuccessful Trade between the EU and ASEAN

Beyond these main reasons, one can also observe specific patterns in why trade agreements fell through between the EU and its other trading partners, and the same holds for ASEAN. This will help predict potential clashes between ASEAN and the EU, which can be taken into account to prevent unsuccessful agreements.

On the EU side, patterns indicate that its regulatory agenda can be overexpansive, including extensive binding commitments beyond tariffs. This raises costs and complexity for partners with divergent political priorities and makes it difficult for them to absorb these commitments, especially if they do not have the capacity to fully comprehend it. This makes them come across as a demanding and inflexible partner, consequently stalling negotiations with different or developing regions of the world.

On the ASEAN side, patterns highlight how ASEAN states prefer individual trade rather than collective trade negotiations. Its institutional design, as discussed before, makes unified discussions hard to achieve. As a result, each member pursues trade agreements individually to preserve policy autonomy and avoid binding commitments that may not suit all members. This recurring obstacle undermines the feasibility of a comprehensive EU–ASEAN bloc-to-bloc FTA and has forced the EU to negotiate bilaterally with individual ASEAN members (such as Singapore and Vietnam), producing uneven outcomes across the region.

Hence, this section on the political hurdles highlights some of the core reasons why a comprehensive FTA has not been concluded between ASEAN and the EU in the past. The following section will discuss how the current geopolitical context has exacerbated the importance of an FTA for fruitful trade between the EU and ASEAN.

4 Recent Developments Pertinent to EU-ASEAN Trade Relations

4.1 The US-China Trade War and Tariffs

The first geopolitical development signalling the importance of EU-ASEAN trade is the US-China trade war and the imposition of tariffs. Tariffs are a common protectionist measure, referring to taxes applied to goods entering or leaving a country. The Trump administration (2017-2021 and 2025-ongoing) has been largely associated with tariffs, with its first tariffs imposed on steel and aluminium products entering the US in 2018 (Bown, 2025). Following this, the first tariffs on China were implemented in July 2018. Although many of these tariffs were removed after Trump's presidential term by his successor, Biden, in 2021, more aggressive tariff policies have made a comeback since Trump's second term as president of the United States in 2025. The beginning of his second term saw the implementation of a 10% tariff on all Chinese goods, which reached a high of 104% in April 2025 (International Nut & Dried Fruit Council). China then responded by imposing its own tariffs on US exports. As of April 2026, the United States has a 10% tariff on all imported goods, with no specific tariff in place on China, and China has launched an investigation into the United States' trade practices. The subsequent US-China trade war has had economic repercussions for the rest of the world, including the EU and ASEAN, through supply chain disruptions, rising costs, and macroeconomic spillovers (Chopra & Chopra, 2025).

In 2019, the harmful effects of Trump's first term and his economic policies were seen in how multiple ASEAN countries saw their exports fall - Singapore by 17.3% and Indonesia by 8.98%, as compared to their performance in 2018, thus hindering ASEAN's export-led growth. Similar decreases in exports and economic performance were observed in the EU. A point worth noting is that not all industries were hit equally, with those most reliant on American imports suffering disproportionately. For example, Trump imposed a 50% tariff on all steel imports in June 2025, with Europe as the third-largest provider. Other industries in which the EU exports to the US, such as the automobile sector, which faced a 25% tariff, are also among those affected. Within Europe, impacts from recent tariffs could also vary significantly. Estimates indicate that Germany saw a 0.23% drop in GDP, while in Italy the estimated decrease was 0.01%. (Saussey, 2024) .

Prior to the implementation of the tariffs, ASEAN's main exports to the US constituted electronic machinery and equipment, and industrial machinery (Dzulkifli, 2026). Interestingly, this aligns with the EU's top import sectors, as discussed in part 1 of this paper. Likewise, the EU mainly exported pharmaceutical products, chemicals, machinery, and mechanical equipment to the US (Europa, 2025), which is also ASEAN's top import. This match between EU exports and ASEAN imports, and between ASEAN exports and EU imports, shows that their respective industries meet each other's demand. As Trump's tariffs reduce ASEAN's exports to the US, there is potential for ASEAN to redirect its excess exports to the EU instead, and vice versa, to cut losses, underscoring the importance of an EU-ASEAN FTA.

Trump's tariffs represent not only an economic policy but also a global mindset shift, implying a trend of increasingly negative attitudes towards free trade and a move towards protectionist policies (Zafar, 2025). This constitutes an overall increase in volatility in the global economy, as discussed in part 2 of this section. An FTA could hence serve as a safeguard against this wave of protectionism by redirecting trade. The EU and ASEAN can provide new markets for each other to offset losses, especially given their trade potential and the alignment of their largest export and import industries.

4.2 Growing Importance of Trade Diversification

In the current volatile state of geopolitics and economic relations, and amid unexpected supply chain disruptions such as COVID-19 and the Suez Canal blockage, having a safety cushion is very important. In terms of trade, this would mean having multiple trade partners. A country with multiple export bases will be less affected by protectionist measures imposed on it, as it can direct its products into other markets and therefore suffer lower losses. One positive example would be China, where overall exports increased in the last quarter of 2025 due to its multiple export bases, despite fewer shipments to the US. Additionally, production within a country can continue despite economic shocks, since it can obtain the same inputs from another country unaffected by the shock.

Figure 7 shows a UN Trade and Development (UNCTAD) graph highlighting that countries with diversified global trade partners (based on the average number of trading partners) have less volatility, compared to those that are non-diversified. Volatility is based on the variation in exports, and it is evident that having more trade partners leads to a smaller decrease in exports. For both the EU and ASEAN, having multiple established trade partners will make it easier to navigate this new geopolitical context and unexpected shocks, where countries are each seeing how volatile other actors can be.

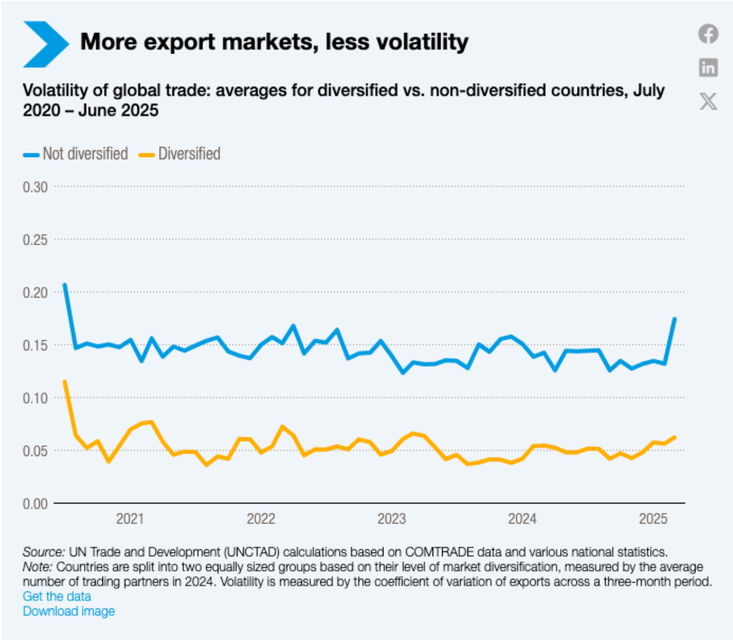

Figure 7: Volatility in trade in comparison to trade diversification, 2021-2025 (UN Trade and Development)

Furthermore, uncertainty is a central theme in contemporary economic discourse. The World Economic Forum (WEF) Chief Economists' Outlook and the US Federal Reserve's Beige Book classified current economies as "highly uncertain", especially due to the emergence of leaders like Trump and fast shifts in economic policies.

While uncertainty is usually seen as an obstacle to foreign investment, it also leads to lower trade volumes and slower GDP growth. Considering the current state of EU-ASEAN bilateral relations and trade, an FTA can help both regions be less affected by uncertainty, particularly through trade diversion. As stated by UNCTAD, trade agreements establish rules and regulations, especially when the global market is marked by instability, providing a safety net that is important for both the EU and ASEAN today.

Moreover, countries with multiple export bases have a smoother transition in the event of an unexpected turn, such as a change in economic policy, because they can simply shift focus to another region. In this case, an FTA would protect both ASEAN and the EU from future shifts by ensuring both regions have diverse trade partners through a regionalised trade relation.

4.3 The World Trade Organization (WTO) and Rise of Interregionalism

Talk of global trade requires mention of the World Trade Organization (WTO). The WTO is an international organisation, established in 1995, whose main role is to maintain trade relations between countries. It enforces trade contracts among member countries, negotiates trade rules in different industries, and facilitates the globalisation and liberalisation of trade. The WTO agreement ensures that each of the 164 member states complies with its laws and regulations, therefore serving as a legal framework for international trade. (Drabek 2024)

However, in recent years, the role of the WTO in determining the direction of global trade has diminished significantly, so much so that it was not even mentioned by Canadian Prime Minister Mark Carney at the 2026 WEF.

One factor undermining the WTO's role is the rise in interregional agreements. The WTO had initially set out to be a "forum of multilateral trade negotiations" (Reinsch 2026), but ultimately produced only one multilateral agreement amid other failed attempts. Considering the wide scope and the large number of WTO members, the establishment and negotiation of such agreements can be difficult, which may explain the increase in Regional Trade Agreements (RTAs) compared to broader agreements. There are currently 360 RTAs in force (Drabek 2024), indicating a shift towards regional trade blocs. Countries forming their own agreements outside the WTO undermine the WTO's influence on global trade by reducing its role in enforcing trade agreements and facilitating intercountry trade. Although RTAs operate alongside WTO rules, they run counter to the WTO principle of non-discrimination among member states. (Drabek 2024). An interregional trade agreement gives benefits to the signing parties that favour trade with countries and regions, further undermining the importance of the WTO's rules.

Adding to this, the WTO's dispute settlement mechanism, the Appellate Body, has been inactive due to the US blocking the appointment of new judges over concerns about judicial activism. Therefore, the WTO has no mechanism to enforce its rules, thereby allowing countries to overlook core principles such as non-discrimination.

Evidently, the modern trading system has evolved into a regional block (Dadush, 2022). The WTO's declining influence can be interpreted as a manifestation of this trend. The EU is also evidence of this trend, as it is already engaged in multiple interregional FTAs with Africa, the Caribbean and the Pacific. As diversifying trade partners gain importance, countries are turning to regional agreements instead of utilising the WTO. Considering this change in the WTO's position, an EU-ASEAN FTA seems more relevant in the current state of global trade, especially to sustain close regional trade partnerships and avoid losing out to other economies.

5 Discussion

All in all, an EU-ASEAN FTA definitely offers opportunities and strategic benefits, especially in light of the uncertainty in the current geopolitical context. Despite political challenges, it remains a realistic path to supply chain and market diversification, economic growth, increased consumer welfare, and a strengthening of global trade position. However, for a full region-to-region FTA to be achieved, both regions will need to agree on specific conditions, given the existing political hurdles.

Primarily, there needs to be a shared understanding amongst ASEAN nations that the FTA will benefit countries differently due to inequalities in economic development. ASEAN mostly imports machinery and appliances, transport equipment, and chemical products from the EU (European Commission, 2025). Such imports are dominated by more economically developed countries, such as Singapore, Thailand and Malaysia (European Commission, 2022), with economies focused more on innovation and technology. Countries like Laos and Cambodia, whose largest industries are manufacturing and agriculture, are less likely to benefit from trade, as they do not require such technology. Despite varying levels of benefit, the FTA remains largely beneficial for ASEAN as a whole, thanks to increased trade and investment. In fact, the inflow of investment, technology, and knowledge exchange from the EU can help grow the economies of developing ASEAN countries. ASEAN countries will need to realise that the FTA could bring significant advantages to developed and developing economies alike, and thus agree to commit to seeing it through to implementation.

Furthermore, there is a need for ASEAN to standardise the adoption of certain rules and policies across all member countries. With less room for policy flexibility among members, every ASEAN country will need to agree on a common position for ASEAN to facilitate negotiations. Additionally, in the EU's FTAs with other countries, FTA partners must comply with various regulations, such as product safety, environmental requirements, and labour standards (Elms, 2017). Unfortunately, not all ASEAN countries uphold the same production standards, with some countries engaging in poor working conditions and environmentally unsustainable practices. For agreements between the EU and ASEAN to materialise, ASEAN countries will need to improve these standards through institutional and systemic reforms. At the same time, the EU would need to be understanding that such changes require time, and that negotiations can still take place as ASEAN countries continue to reform to meet the EU's expected regulations. Perhaps incremental approaches before a full EU-ASEAN FTA is reached would be useful, allowing time for alignment among ASEAN countries.

6 Limitations

While this paper provides a comprehensive analysis of the opportunities and challenges of implementing an EU-ASEAN FTA, there remain some limitations to our research.

Firstly, the research in this paper has primarily relied on the analysis of trade flow data and macroeconomic indicators from a variety of sources. There could be some data gaps amongst the different sources, such that some sources are less reliable than others. Additionally, the data comes from different years and may not reflect the most up-to-date statistics, so it may not accurately represent the current trade situation. Comparisons between data from different years would also mean our comparisons do not reflect the actual trade situation today. Additionally, the datasets used in this paper are static, reflecting past patterns rather than future changes in supply and demand within ASEAN and the EU. The paper's position that the EU and ASEAN should enter into an FTA would be much more strongly supported if datasets on future trade patterns could be accessed and included.

Moreover, while this paper acknowledges differences in gains and losses across countries, specifically ASEAN countries, it does not discuss the impacts on within-country inequality resulting from the FTA, such as labour displacement due to increased competition in certain sectors. It also does not discuss differences in gains and losses across industries. The sectoral and distributional disparities within countries would thus be an important effect of the FTA to study in future research.

Lastly, this study focuses mainly on the economic opportunities amid current geopolitical volatility, as well as the political hurdles to an EU-ASEAN FTA, but does not explore in depth the conditions that led to the success of existing bilateral FTAs between the EU and other countries or between ASEAN and other countries. A closer analysis of how prior negotiations were conducted would reveal crucial points that can be adopted in negotiations between the EU and ASEAN to successfully realise an EU-ASEAN FTA.

7 Conclusion

The close trade relationship between ASEAN member states and the EU, as well as the existing EU-Singapore and EU-Vietnam FTAs, suggests trade potential that could be transformed into an interregional agreement. From a trade perspective, free trade has multiple benefits, ranging from increased employment to greater consumer choice and welfare, which have been explored in the existing literature. Additionally, the EU and ASEAN possess trade potential, particularly because their largest import and export sectors correspond, further highlighting that an FTA could be beneficial for both regions.

However, most crucially, the success of this FTA depends on how certain issues, such as institutional differences, are handled. The heterogeneity of ASEAN economies and policies is likely to render it more difficult to reach an agreement. Meanwhile, the EU would have to ensure that the terms of the FTA are satisfactory to its citizens and accommodate their expectations. As seen in the case of the EU-Mercosur Association Agreement, the success of a free trade agreement extends beyond the two entities and is also attributed to the citizens of the EU.

An FTA between ASEAN and the EU is not an entirely new concept, as previous attempts have sought to facilitate closer economic ties between the two regions. Although negotiations have been halted since 2009, political and economic instability and uncertainty have made it more critical than ever to implement an EU-ASEAN FTA. Considering American President Donald Trump's heightened tariffs and unexpected economic shocks, securing an EU-ASEAN FTA can serve as a security measure for both sides amid the overall increase in global economic volatility.

Given all this, is it pertinent to recognise that there are ongoing conflicts that could also impact the establishment and influence of such an FTA, a global example being the Israel-Iran War. In this case, the geographical location of the Hormuz Strait is pivotal due to its role in global trade and the overall global supply chain. Since March 2026, the number of ships that pass through the strait has fallen to less than half, which has directly led to an increase in prices of both oil and gas. Because this conflict is recent and still ongoing, it is uncertain how it will affect European and Asian economies, but it has highlighted the uncertainty of global trade, further underscoring the importance of trade diversification as a precaution.

On a positive note, EU-ASEAN trade negotiations are expected to gain more momentum in 2027. EU ambassador to ASEAN Sujiro Seam has confirmed that the EU's strategy is to first accomplish bilateral agreements with the Philippines, Thailand and Malaysia by 2027 before considering a more comprehensive, region-to-region FTA (EuroCham Cambodia, 2024). EU trade commissioner Maroš Šefčovič has also stated in his talks that negotiations with the three countries listed above are progressing well (Paramitha, 2025), aligning with the 50th anniversary of EU-ASEAN relations. This signals that 2027 is becoming a political moment in which both sides are concretely building towards a more comprehensive FTA in almost a decade.

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Section

II

Identity, Rights, and Representation

Four papers examine how states, newspapers, and political actors construct, suppress, and instrumentalise identity — from feminist expression under censorship in China to minority representation as diplomatic strategy in Taiwan — revealing the ideological work that media and institutions perform in the Asia-Pacific.

NEGOTIATING FEMINIST EXPRESSION

State Media and the Discursive Governance of Women's Stand-Up Comedy in Contemporary China

Asia Pacific Research Circle

Sciences Po

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Abstract

Commercial stand-up comedy has become a potent arena for feminist expression in mainland China over the past decade, while its development has come under intensified censorship and regulation by the authoritarian state. This paper examines how state media in contemporary China respond to and negotiate with the rising feminine discourse, a broad spectrum of gender-conscious expression articulated by female comedians and circulated among the broader public. Drawing on Critical Discourse Analysis, it analyzed 24 articles published on People.cn, an online state media platform, between 2022 and 2025 concerning commercial stand-up comedy and female comedians. The paper argues that this state media platform actively employs a set of discursive strategies—depoliticization, moralization and boundary-making, developmentalist reframing and instrumentalization—to contain and co-opt the development of the stand-up comedy industry, particularly women's stand-up comedy. By doing so, it redirects attention away from structural critique, imposes normative boundaries on acceptable expression, rearticulates the messages conveyed by female comedians, and incorporates feminine discourse into state cultural and political agendas. The study thus shows that women's stand-up comedy functions as a site of political activism while simultaneously being subject to state intervention. More broadly, it contributes to understanding the evolving relationship between the authoritarian state, feminism, and civil society in contemporary China.

Keywords: Feminism in China, stand-up comedy, feminine discourse, state media, discursive governance

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1 Introduction

In the past few years, the Chinese commercial stand-up comedy industry has witnessed a surge in female voices. In 2017, when the online stand-up comedy, represented by the television programme ROCK & ROAST, formally went into Chinese popular culture, there were only two female comedians among 18 competitors. In the following years, more and more female performers started to appear in this programme and used this platform to discuss female issues, make fun of and criticize patriarchal phenomena in Chinese society, demonstrating strong feminist overtones and sparking serious controversies both online and offline. In a social organ without a civil society base and tradition, the stage of stand-up comedy effectively served as a newly emerged public sphere where debates over female issues converged, creating a wave of feminist discourse and pushing further on the dynamics of Chinese feminism.

However, the stand-up comedy industry in mainland China has long been subject to political censorship and the continual delineation of taboo boundaries, resonating with the general trend of tightened control over culture and society under contemporary Xi's China. Having portrayed itself as the only legitimate leader of Chinese feminism, the state becomes increasingly authoritative with its gender ideologies and policies. The rapid development of bottom-up feminist momentum through stand-up comedy performance and circulation can potentially confront the top-down state regulatory approach, turning stand-up comedy into a negotiative arena between agents and structure where feminine discourse is reproduced and reconstructed.

While most of the existing literature explored this dynamics through the lens of comedians and audience, this study analyzes it from the perspective of the state and uses state media as an analytical entry point. It is devoted to answering: How does the authoritarian state, through state media, respond to and negotiate with feminine discourses produced by commercial stand-up comedy in Mainland China? And in what ways does this tension reveal broad trends of struggles between feminist expression and authoritarian state ideology?

This paper starts by reviewing the trajectory of feminist movements in modern China, highlighting the complex relationship between civic feminist voices and state feminism since the introduction of feminist ideas in China. It further explores how commercial stand-up comedy, mobilizing the sociological functions of humor, thrives and ignites considerable social momentum in the past decades. The literature review ends with an overview of previous literature concerning this phenomenon and introduces a new state-level perspective in the existing literature gap. Subsequently, a Critical Discourse Analysis is conducted on a collection of 24 articles related to feminine commercial stand-up comedy published on People.cn, one of the most important state media organs in China. The paper concludes by discussing how the state media employ discursive strategies—depoliticization, moralization and boundary-making, developmentalist reframing—to actively reshape public discourse created through the stand-up comedy; how those strategies are specifically employed to the women's stand-up comedy; and how this provides implications to the broader developmental patterns of public culture and civic feminist politics in China.

2 Literature Review

2.1 Feminism and Gender Discourse in the Modern History of China

2.1.1 Traditional Gender Ideology

The status of women in traditional Chinese society can be understood through the lens of the Confucian philosophy and patriarchal feudal system. Confucianism, an important pillar of ancient Chinese society, emphasizing harmony through hierarchy, naturally incorporated sex division as an essential structure of the systematic social hierarchy: husband-wife relation is one of the "Three Cardinal Guides," which are the fundamental basis of the social order. Epistemically, women are considered inherently inferior and intellectually incapable, who therefore should always rely on men and be placed always inside the home. In Confucian teachings, a woman is expected to adhere to the "Three Obediences," according to which her identity is defined successively through her relationship to her father, husband, and son over the course of her life. These values provided the essential moral support for the development of the traditional family system in China, which is characterized as "patriarchal, patrilineal and patrilocal" (Leung, 2003). Men held the primary power in the household; descent, inheritance, and family name were traced through the male line; and a woman was insulated from her natal family after marriage. The aggregation of the family system produces the society-wide feudal system, where the hierarchical distribution of resources was institutionalized into law, custom and social practice to realize "harmony" prescribed by Confucianism. For instance, the Clan System, as the basic institution of local community in imperial China (Qin-Qing), was characterized by absolute male control of lineage, honor and resources, placing kinship as the foundation block of patriarchy. The Imperial Examination System, as a meritocratic educational institution and perhaps the most important access to political power and social mobility, excluded women since its foundation. By design, Confucian norms that subordinate women were reproduced through socialization and examination, gradually penetrating the patriarchal structure into tangible social practices. Within this system, most women were denied rights, freedom and expression and the change in women's social status was minor and mostly driven by dynastic shifts (Menke, 2017).

2.1.2 Early Modern China and the First Women's Movement

The prolonged and entrenched imperial feudal system started to collapse in the late Qing era. At the same time, the question of women entered a new stage following China's exposure to Western thoughts. On one hand, the drastic loss of sovereignty placed the traditional, agricultural and feudal form of social organization into question. On the other hand, the spread of Western schools inspired Chinese people to reflect on various aspects of society. In the blending narratives of "learning from the West" and "self-strengthening," a series of reform and modernization attempts were made, in which the call for advancement of female status was often associated with nationalist appeals. Liang Qichao, the leader of the Hundred Days' Reform in 1898, explicitly related the broader access of women's education to the enhancement of national strength, as he claimed: "the protection of the species necessarily begins with and pivots on the education of women" (1897). Under the discourse of state-building, women were expected to contribute to society through education, which informed them to play a better role in serving husbands and educating sons (Karl, 2012). In

1903, Jin Tianhe, in his writing “The Women’s Bell,” further developed the theory that the suppression of women’s potential utility was the root of China’s backwardness. Hence, he supported granting women rights to schooling, establishing friendships, doing business, owning property, leaving and returning home freely and freedom of marriage. Some of these proposals were materialized in the Late Qing’s Reform since 1901, such as the establishment of women’s educational institutions and the abolition of the food-binding practice. During the late Qing period, the issue of women was brought to the forefront of the public debate as part of the discussion concerning the direction of China in the face of imperialism and modernization.

Following the influx of revolutionary ideas that sought to fundamentally change the country by overthrowing the Qing monarchy, there was a closer and wider association between women’s emancipation and national salvation. Qiu Jin, the famous radical revolutionary martyr who joined Sun Yatsen’s Revolutionary Alliance, founded the first women’s newspaper Chinese Women’s News in 1906, trying to utilize the growing press industry to “unite all Chinese women” in their patriotic pursuit of liberation (Dooling & Torgeson, 1998). The May Fourth Movement was widely regarded as the starting point of the first wave of the feminist movement: feminist literature and press began to circulate widely among the intellectual class, female students and scholars were normalized in the educational field, and the “Women’s Question” was highlighted as a separate section for debate in May Fourth ideology (Dooling & Torgeson, 1998; Guo, 2023).

Situated in its unique historical context, the development of early Chinese feminist theories and movements tended to follow a special converging path. Women were portrayed as the victims of the old system, and women’s subordination was denounced as the root of national weakness. Within this framework, women, like the Chinese people, were expected to be saved by modernization efforts and the establishment of a new system. Some alternative perspectives did appear, such as that of He-Yin Zhen, who took an anarchist stance to reject the idea that women’s oppression could be simply solved by blending into national strengthening efforts and warned against the enduring nature of economic exploitation and patriarchal family (Karl, 2012). But overall, the women’s progress was mostly seen as part of efforts for national progress since the birth of Chinese feminism, which paved the way for the dominance of state feminism in the following decades.

2.1.3 Socialist Feminism and State-Led Women’s Emancipation

With the founding of the People’s Republic of China (PRC), the situation of women in China entered a new chapter. During Mao’s Era, state-led Marxist feminism became the official feminist narrative, providing rounded guidance to China’s sex and women policies. Marxist feminism understands sexual inequality between men and women as an expression of class inequality and private ownership as the root of oppression (Zheng & Zhang, 2010). Thus, solving the “Women’s Question” was incorporated as part of the social struggle against feudalism and capitalism that was implemented from the 1950s to the 1970s. Article 96 of the PRC’s 1954 Constitution granted women equal rights “in all spheres of political, economic, cultural, social and domestic life.” The 1950 Marriage Law, to a large extent, materialized many of the reform calls in the first wave feminist movement, including the abolition of forced marriage, concubinage, child marriage and the granting of equal, monogamous and free marriage rights to men and women. With Mao famously claiming "Women hold up half the sky," Chinese women were seen as equal to men in their ability to participate in social production under public ownership. By the late 1970s, about 90 percent of working-age women in cities were participating in the workforce (Erdenebileg, 2016). Family, accused by Engels as the construct of individualistic capitalism, was undermined by the socialization of domestic labour and child rearing (Leung, 2003). In every aspect of society, visible distinctions based on sex were rendered marginal, largely subordinated to class difference.

Notwithstanding the visible progress in women's rights and economic situations, the prevalence of state-sponsored feminism in this period meant that the state owned the absolute and monopolistic control over the decisions made for women. For example, as part of the socialist reform, the Party mainly represented the interests of women of the "proletarian" or "laboring" class and neglected the urban professional class (Zheng & Zhang, 2010). Moreover, appointing itself as the only legitimate leader of women's emancipation, the state employed a highly top-down approach toward the feminist movement. Earlier in 1949, the Party had endorsed the founding of the All-China Women Federation (ACWF). As a semi-official, party-funded mass organization, it served as a "governmental outreach" to disseminate the central messages to the female masses and an umbrella organ to unify existing women's organizations across China (Li & Wang, 2018). Cleverly co-opting feminist narrative into the party-state building project, the state feminism in Mao's era was nevertheless criticized for reducing complex gender differences to class struggle efforts. One of its consequences was known to be the popularization of the male standard and the masculinization of women (Leung, 2003). These collateral effects of state feminism would lead to more reflections and debates in the years after.

2.1.4 Post-1980s Gender Turn and Global Feminism

Following the end of the Cultural Revolution and the introduction of the Reform and Opening Policy, China has formally abandoned its pure socialist political economy and started to implement neoliberal market reforms and reposition itself in the wave of globalization. Beijing's hosting of the United Nations Fourth World Conference on Women in 1995 marked China's opening to the international feminist campaigns. The concept of gender, popularized in the Western second wave feminist movement, was introduced to Chinese feminists. Instead of equating men and women as the basic unit of labor, the adoption of gender as a conceptual tool emphasized taking the gendered-power relations and structures into account at every stage of decision-making (Lieber & Jayaram, 2012). However, while recognizing the influences of international ideologies, the state remained highly cautious with the term "feminism." Instead, in its official documents, "gender equality" and "gender theory" were strategically deployed to distance itself from being overly Westernized (Zheng & Zhang, 2010). Feminism gained an expanding living space with nuances.

The state's efforts to reframe itself as the pioneer of global women's progress were accompanied by the erosion of the ACWF's monopoly. Independent feminist NGOs and scholars emerged, establishing a collaborative relationship with the official organ. One notable advancement made in this period was the anti-domestic violence campaign since the

1990s, which operated through an organic combination of information, training, legal advocacy and action research (Zhang, 2009). This movement pushed forward the 2001 Amendment to the Marriage Law that explicitly identified domestic violence as a legal issue. Moreover, more legislation was made in adaptation to the massive changes in China's socio-economic landscape, such as the 1992 Law on the Protection of Women's Rights and Interests, the prohibition of sex-selective abortion in 1994 and the 2008 Labor Contract Law (Lieber & Jayaram, 2012). However, many of these measures remained highly controversial and were commonly criticized for discretionary enforcement. Particularly, in the context of a neoliberal economy, women were faced with increasing discrimination in terms of hiring, rewards, promotion and the recurring double challenges as an employer and as a mother (Leung, 2003).

2.2 Feminism in Contemporary Xi's China

According an article released on the official website of ACWF, the guiding values of women's development in contemporary China should be "the core socialist values, Marxist theories of women, the socialist women's emancipation thought with Chinese characteristics, and the corresponding conception of gender equality" (Ding, 2016). Indeed, the contemporary state policies toward the Women's Question are characterized by a clever combination of Marxist values, which has been adopted since Mao's era, and contemporary state values, which are put under the umbrella of core socialist values and socialism with Chinese characteristics in Xi's New Era.

The classical Marxist view is now reaffirmed by the state to be the monopolistic representation of feminism. The abolition of capitalism as the social institution is seen as the prerequisite of women's emancipation (ACWF website, 2022). Again, the state's interpretation of Marxist theories emphasizes the structural flaws of capitalism and justifies socialism and communism as the necessary path toward gender equality. This view corresponds to the mainstream narrative of contemporary China, which continued to ground part of its legitimacy in its socialist identity despite significant structural changes since the 1980s. On top of it, an authoritative construction of modern Chinese history further seeks to legitimize the Chinese Communist Party (CCP)'s leadership. For instance, the efforts made by reformists in the 1890s and revolutionaries in the early 20th century are criticized for their male-centered values and incapability to bring women's emancipation into place (ACWF website, 2021). In contrast, the CCP is portrayed as a staunch guardian of women's development, considering it as an inseparable part of national development and the only savior of the female group that has been proven by history. Thus, the state vocally announces that "adhering to the leadership of the party is a logical necessity for the development of Chinese women's cause" (ACWF website, 2021). As shown, in Xi's era, the state continued to hold a tight ideological grip on gender issues.

These ideological consolidations are accompanied by boundary-drawing efforts. Chinese feminists and society have been fiercely debating between two possible translations of feminism in Mandarin, "nüquan zhuyi" (women rightism, a sensitive term implying political advocacy and activism) and "nüxing zhuyi" (womanism, a less antagonistic term emphasizing women as gendered subjects) in recent decades (Feng, 2009). Against this backdrop, the official statement of the state directly attaches a strong negative connotation of "nüquan zhuyi" and equating it with Western feminism, which failed to bring concrete outcomes and has degraded into mere political tools (ACWF website, 2021). The state also demonstrates an ideological continuity in discrediting Western thoughts for being overly individualistic, issuing normative warnings about the irrational aspects of extreme (and deceptively "refined") self-interest brought by Western feminism. The stance toward Western feminism is an important remark as it shows that China has abandoned its openness and integration to international voices in the previous period and is currently re-imposing a nationalist layer to its governance of women's issues. Interestingly, the term "nü xing zhuyi" is not endorsed by the state either. Rather, as before, it prefers terms such as "equality between men and women," "gender equality," "women's emancipation" to evade the sense of political confrontation and harmonize the nature of the struggle. Any ideas and actions that seem overly aggressive to the state will be labeled as creations of "gender antagonism," a deliberately ambiguous term that can be flexibly mobilized in the state's normative regulation process. These cautious demarcation efforts by the state reflect its increasingly conservative and authoritarian attitude toward feminist expressions in Xi's era.

The state also keeps a high level of control over feminist movements. In 2016, the ACWF experienced a major reform that was designed to re-consolidate the centrality of Party authority and expand the top-down control into grassroots organizations (Zhou, 2019). This recurring party entrenchment into this mass organization was also reflected in the ACWF press, which claimed that the foundation of ACWF would not be possible without the endorsement of the party and that adhering to party leadership has always been the fundamental principle of the ACWF. Under such a context, independent bottom-up feminist movements became extremely limited and faced severe suppression. For example, five feminists were arrested for planning a public campaign against sexual harassment on public transportation in 2015. Tensions continued to be seen, such as in the Chinese #MeToo movement since 2018, the "Chained Woman" incident and Tangshan Incident in 2022, as well as the "MaskPark" scandal in 2025. Though the state succeeded in suppressing most of the voices, these cases exhibited the persistent public anger in society.

Currently, key tensions concerning women's advancement revolve around family, workplace and security. As for family and marriage, the young generations of women have expressed declining interest in getting married and having children, as reflected in the continual drop in marriage and fertility rates in the past few years. This mentality, nevertheless, poses obstacles directly against the state policy, which seeks to uphold traditional family values and facilitate population growth in response to an aging population. While claiming that "establishing a gender-equal marriage relationship is the key to improving the willingness to marry" (Xu, 2022), many of the state policies that attempt to increase the marriage and birth rate, such as establishing the divorce cooling-off period, simplifying the legal procedure of marriage, and reducing the price of condoms, spark ongoing controversies among society, especially among women. The state is criticized for its authoritative intervention in personal choices since almost none of these policies tackle structural challenges faced by women. The ACWF press attributes the decreasing willingness of marriage directly to the "negative model effects of the divorce group" and the Western irrational feminist sentiments (ACWF, 2021; Xu, 2022).

However, women are more and more aware of the use of state gender ideology that tries to divert public attention from the deeper causes of social tensions for the state's interest. Regarding employment, women in contemporary China faced dual oppression from the neoliberal economic structure and the patriarchal structure. Compared to men, women are expected to take on an extra family duty, leading to persistent debates about balancing family and career. Moreover, the legal ban on firing pregnant women, which is intended to protect women's rights, turns out to impose an extra burden on working women: employers, refusing to spend more costs, often discriminate against women in the employment phase without any concrete legal consequences. Besides, safety issues such as crimes based on sex and human trafficking are also placed under the public gaze. In this case, women often questioned the transparency and capability of the state in executing justice and protecting women's physical security. Given that the state remained highly cautious about any organized civil actions, most of these debates take place on digital platforms, which served as both a second front of struggle and a controllable area under the censorship of the state (Tang, 2024).

2.3 Humor, Cultural Resistance and Feminist Expression

2.3.1 Humor as Negotiative Practice and Soft Resistance

For social scientists, humor is never a mere form of amusement. It often serves multiple social functions and involves complex power relationships. Mary Douglas, for instance, identified the "rite" and "anti-rite" properties of joke-telling: the structure of humor is usually subversive, reordering the typical patterns of expression and perception while the experience of humor is based on "a sense of mutual support for common belief and behavior" (Mintz, 1985). The duality of subversion and affirmation inherent to humor, as claimed by Mintz, is universal to human society.

The presentation of humor under authoritarian censorship can be further understood through the political lens. On one hand, with the tight control over content and opinion, humor, which seems to be entertaining and thus non-confrontational, naturally constructs a relatively safe realm for political expression. Moreover, due to the lack of a formal channel of feedback, humor acts as a barometer of society for the state to better understand and communicate with the people. On the other hand, through re-framing, co-option and censorship, humor can be twisted into a managed tool of political legitimization that reinforces the power structure. Accordingly, a more pessimistic view toward the role of humor believes that for the government, the ultimate end of regulating humor is to enhance its legitimacy (Chang, 2025). Humor can help achieve this purpose through the extension of public support base, the formation of collective identity and social bonds, the release of social tensions, the promotion of nationalism and so on. Consequently, performers of humor would develop an adaptive mechanism of self-censorship to re-master agency within the limitations, leading to another round of reaction, selection and regulation by the government. As a result, the practice of humor witnesses the constant interaction between both the subversive and suppressive forces, endowing itself with a negotiative role of soft resistance in political communication.

2.3.2 The Rise of Commercial Stand-up Comedy in China

If humor is the negotiative practice to grant potent agency for actors under the constraints of authoritarian regulation, stand-up comedy provides an arena for continuous creation and circulation of humor, embodying this "structured" and "structuring" process theorized by Giddens (1984). Mintz (1985) has famously titled stand-up comedians as the social commentator, mediator and cultural spokesperson, whose functions include not only fun-making, but also the expression, reflection and examination of the current sociocultural life.

Contemporary China has witnessed significant development in the commercial stand-up comedy industry over the past decade. The concept of stand-up comedy was introduced from the Western popular culture into mainland China in the early twenty-first century (Zhang, 2024). Several television programs were devoted to the discussion of trending social topics using stand-up comedy techniques. However, it was not until 2017, when the birth of two online stand-up comedy programs, Roast and Rock & Roast, received unprecedented attention, that stand-up comedy, as a form of comedy performance and entertainment, became well-known to the public. Among the two, Rock & Roast, devoted specially to stand-up comedy, pioneered a new mode of online stand-up comedy production: comedians are recruited from the ordinary people, all of which develop its own style and persona based on their diverse background; comedy is presented in the form of competitions voted by the audience; popular and controversial celebrities are invited as commentators and cheer-leaders (Dong, 2023). From 2017 to 2022, five seasons of Rock & Roast were produced, rapidly expanding its publicity and audience base. Since 2024, Rock & Roast has been split into two competing shows, The King of Comedy Stand-up Season and Stand-Up Comedy and Friends, both of which became top-tier popular shows on China's major online video platforms.

The prosperous rise of online stand-up comedy also facilitated the development of live stand-up comedy, highlighting the face-to-face, close interaction between comedians and audience. According to the "2021 National Performance Market Annual Report" released by the official state organ, China Association of Performing Arts (Liu, 2021), 18,500 commercial stand-up comedy performances took place in 2021, with box office revenue of 391 million yuan, witnessing an increase of more than 50% compared to 2019. Nowadays, stand-up comedy has become one of the most popular mainstream forms of entertainment for the young generations. A stand-up comedy industry report in 2022 showed the majority of the audience were educated urban middle-class ranging from 18 to 34 years old, who had a high level of pressure from work and life and a high level of demand for emotional release, social recognition and self achievement. Up until this point, stand-up comedy has been built into a solid and mature arena of entertainment, social engagement and potentially political communication.

2.3.3 Feminine Discourse in Chinese Commercial Stand-up Comedy

The boom growth of the stand-up comedy industry in recent years is followed by the increasing female presence in comedy production and performance. Back into the birth of commercial stand-up comedy, female comedians were barely seen. In the first season of ROCK & ROAST in 2017, there were only two actresses among 18 competitors. In 2021, the female proportion increased to more than 20% (Guo, 2021), contributing to a distinctive voice in the field of comedy. Female perspectives and female issues started to become prominent comedic themes that are frequently addressed by the comedians and, at the same time, sparking considerable controversy both online and offline. The period 2024-2025 signaled an explosive increase in the width, depth and impact of these female voices. Characterized by a more diverse group of female performers, a wider range of perspectives and topics, and a greater media presence than their male counterparts, a "golden age" of women's stand-up in China is observed to be emerging (Wang, Shui, Ma, & Yu, 2025). Their performances touched on social structures and issues from multiple angles — work, life, marriage, and family — effectively driving broader public discussions on topics such as arranged marriage, period-shaming and the flight attendant uniform reform. At the same time, women account for a greater proportion of the audience (55%) and demonstrated both higher initial viewing intention and stronger user stickiness (Tencent Video, 2022). This combination of output and input intensities has gradually transformed stand-up comedy into a popular arena for diverse discussion about gender-related topics and a potential political tool to challenge the power structure.

Despite a significant surge in visibility and influence, the discourse produced by female comedians is far from uniform. Instead, Liu and Zhao, after conducting thematic analysis of gender-related transcripts of the 107 stand-up comedy performances of ROCK & ROAST, concluded that the contemporary rise of gender-humor practices of female comedians "encompasses various discursive strategies of fun-making and diverse expressions of women's experience" (2025). I agree with this observation and join them by categorizing this bluster of feminist-like discursive strategies as "feminine discourse," which does not represent "a unified feminist political agenda or form of resistance", but "a set of concrete, localised negotiations" (Liu & Zhao, 2025). A limited number of literature has devoted to exploring the production and reproduction of this feminine discourse. Chen and Gao (2020) pioneered in examining how Chinese stand-up comedy engages with and subtly challenges the state's dominant discourse of the "positive energy" under authoritarianism. They argued that the discourse adopted by Chinese comedians was "transgressive," in which strategies such as self-deprecation and purposeful ambiguity were employed to avoid direct contestation of either social structure or political system, but rather to present alternative viewpoints only. Similar conclusions were reached by Li and Guo (2025) and Liu and Zhao (2025), who enlarged the sample size of analysis and affirmed the negotiative agency of comedians. Tang (2024) and Lai (2025) further included an audience perspective in the formation of feminine discourse. They demonstrated the internal dynamics of reception and interpretation within the audience group, contending that the current major contribution of feminine stand-up comedy was limited to the provision of an open space for the convergence of various feminist-like voices, rather than unified agenda setting. Overall, these previous studies tend to focus on the production of feminine discourse by comedians and its reproduction process through the interaction with the audience and social reality. Feminine stand-up comedy is confirmed as a rising form of soft resistance in a process of change and development.

While the existing literature highlights how female stand-up comedy agents actively adopt nuanced negotiation in place of overt confrontation to adapt to the Chinese context, it remains unclear about the specific subjects these agents are confronting or negotiating with. Most literature review made an ambiguous reference to the general social context, implying the choice of soft resistance was mainly made due to the concerns of public pressure or cultural conservatism. There is no explicit discussion about the authoritarian political context specific to China. Moreover, with most literature studying this topic through the lens of comedians and audience, no attention is paid to how exactly the state reacts and negotiates with this feminine discourse and how an orchestra-style of dynamics is collectively produced and reproduced in this back-and-forth process.

The stand-up comedy industry is not new to state censorship. In fact, the state has accordingly strengthened its control over the industry in the past few years. In 2021, an administrative fine of 50,000 yuan ($7,692) was imposed on the organizers of a live stand-up comedy show for using vulgar terms that were accused of violating social morality during the performance (Global Times, 2021). Since 2022, stand-up comedians have been required to film themselves reciting the submitted script before their actual performance, word by word, for censor reference (Li & Chiang, 2023). In 2023, comedian House was suspended from performing after making a joke about the People's Liberation Army and a fine of 13.35 million yuan ($1.94 million) was imposed on his company Shanghai Xiaosheng Culture Media Company, the main creator of ROCK & ROAST (Guo, 2023). This event symbolized an earthquake in the commercial stand-up comedy industry: censorship became a prominent presence in the industry, the topics and comedians of performance needed to go through a harsh filtering process and ROCK & ROAST was temporarily suspended in 2023. There are some explicit taboos known to the industry, such as mocking of governmental officials, distortion of traditional Chinese stories or history and homosexual jokes (Tang, 2024). Yet more often, comedians conduct self-censorship according to a general constraint posed by the state's cultural policy or industry regulatory policy, and this interaction can create a potential room for negotiation.

In March 2026, the social account of female comedian Xiaopa, who received enormous attention and popularity by sharply satirizing her son-preferring family with an abusive and repeatedly remarried father, was banned from posting and subscription, and she has been temporarily banned from delivering commercial performances in mainland China. It happened after she made a joke on her social account about how women are expected to take care of their husbands even when they are very sick. This event resonates with the state's internet censorship department's contemporary campaign to specially eliminate the spread of messages that "provoke gender antagonism and undermine marriage and family values" (Observer Net, 2026). This event signals the open outbreak of the tensions between the state's primary goal to promote reproduction and the rising feminine stand-up discourse in the past few years. Amid the growing tension between the rising salience of feminine stand-up discourse and the intensification of censorship and public opinion control by the state, it is worth re-examining the relation between state, feminism and civil society in the new era.

3 My Study

On top of the existing literature, my study is devoted to providing a state perspective on the recent development of feminine commercial stand-up comedy in mainland China, with more emphasis on the political tension between the production of feminine discourse by female comedians in the arena of stand-up comedy and the selection, negation, and legitimization of the state in response. Drawing on Foucault's discourse theory, this study conceptualizes state media as the main site where the state's power is exercised and negotiated discursively. Hence, it asks: how does the authoritarian state, through state media, respond to and negotiate with feminine discourses produced by commercial stand-up comedy in Mainland China? Furthermore, in what ways does this tension reveal broad trends of struggles between feminist expression and authoritarian state ideology?

4 Methodology

Critical Discourse Analysis (CDA) was adopted as the main methodology for this study. Understanding discourse as a social practice that reflects broader and deeper power dynamics, CDA provides an appropriate perspective on how the authoritarian state discursively constructs, negotiates, and regulates feminist expression to reproduce an adapted discourse through media representation. In addition, as a continuous bridging process between theories and empirical phenomena, CDA enables a critical examination of how the current theories explaining state gender ideologies align with actual media language, thus revealing further nuances in state-civil society relations in contemporary China, including moments of relative tolerance and co-negotiation.

The corpus for this study was compiled through a keyword search for the term "stand-up comedy" on People.cn (http://www.people.com.cn), the official online platform of the People's Daily. Among a total of 2,058 results ranked by relevance, the first 320 results were reviewed to assess their relevance. Finally, 24 articles (published from 2022 to 2025) that mentioned commercial stand-up comedy performed by female comedians or stand-up comedy in general were identified, constituting the primary dataset for analysis.

Despite its commitment to providing a contextualized analysis of the stance, attitude and regulatory practices of the state, my methodology contains several possible limitations. To start with, there is relatively limited material publicly released by the state concerning this specific topic. Secondly, as all the materials were collected at a given point, the study is unable to examine the potential dynamics of their presentation. For example, articles might have been edited or deleted after their initial publication. Similarly, the study does not trace changes in state discourse over time and may therefore wrongly assume that the state maintained a consistent stance from 2022 to 2025. Moreover, by treating discourses produced in different types of articles by different authors on the official press site as a unified body of state discourse, the study risks neglecting the institutional nuances involved in its production.

5 Analysis and Discussion

A thematic overview of the corpus found that the media coverage regarding feminine stand-up comedy can be grouped into four categories. First, an overwhelming number of thirteen articles were devoted to introducing and appreciating the development of the commercial stand-up comedy industry. These articles highlights the economic and cultural values of this industry, oftentimes showcasing it as an increasingly important part of China's broader cultural and entertainment industry. Second, there are five articles that comment on stand-up comedy as a specific genre, most of which discuss the factors behind, as well as the normative limits, of the recent wave of popularity. Besides, three articles explicitly convey the state's messages in an authoritative tone, warning of the consequences of transgressing its regulatory red line. Finally, another three articles provide in-depth coverage of female comedians and their performances. These four categories, "Development of China's Cultural and Entertainment Industry," "Commentary on the Development of Stand-up Comedy as a Genre," "Regulatory Governance of the Stand-up Comedy Industry" and "Profile Features of Stand-up Comedians," serve as discursive contexts within which different discursive strategies are mobilized. The following sections subsequently examine the principal discursive strategies mobilized across these contexts.

5.1 Depoliticization

Depoliticization is defined as the systematic redirection of attention away from the structural social issues raised by stand-up comedy, particularly in discussions of its origins, content, and impact. Sometimes, the social implications conveyed by stand-up comedy are directly trivialized as mere amusement. Under the uniform narrative of "qingsongyoumo" (light-hearted and humorous), any content that express bitterness, anger and critics is implicitly discouraged, undermining the multi-dimensional, sociological roles played by stand-up comedy. Yet, more often, the importance of stand-up comedy for more in-depth reflection and expression, especially in the era when its youth generation is constantly saturated with negative sentiments under increasing social pressure, is well recognized by the state. Notably, stand-up comedians are commonly characterized in the state media discourse as "zuiti" (surrogate voice) of the youth, which echoes Mintz's spokesperson theory of public voice representation. The state also compares stand-up comedy to "a distinctive mirror that reflects the fabric of society and conveys diverse voices." Under an authoritarian context, the expressive function of stand-up comedy allows for reflections on life and society to a certain degree and serves as a channel through which social feedback is conveyed to official authorities. However, the fact that this negotiation is taking place totally within the state's power sphere can also make it vulnerable to misrepresentation.

When stand-up comedy inevitably touches upon social issues and social phenomena, the state tries to deescalate the tensions through privatization and over-generalization. Several key topics are concluded by the state as the main motivators of nowadays stand-up comedy performance: "urban drifting, intimate relationship, housing rental pressures and workplace dynamics." While these topics are closely related to the major social tensions, the state chooses to frame them as mostly personal experiences or everyday anecdotes, avoiding any address to the social structure or political system. For instance, while recognizing the Western origin of stand-up comedy culture, the state describes that "Chinese stand-up actors tend to draw from their own experiences and current life, integrating everyday frustrations into jokes," thereby making an implicit comparison that portrays Chinese stand-up comedy as more socially harmonizing. Invocations of "richang" (daily life) and "shenghuo" (life experiences) dominate almost every portrayal of stand-up comedy. This repetitive emphasis serves to privatize and normalize these social problems and reframe them as routine elements and inherent features of everyone's life. By using privatization and overgeneralization, the state astutely detaches itself from the expressions of social discontent and contains the discussion of social issues within the dimension of ordinary life, rather than social structure.

Responding to the increasing expressions of pressure and frustration, stand-up comedy is further seen by the state as a social opium or emotional therapy. Metaphorical reference to "antidote" or "spiritual coffee" appears frequently in the "Commentary on the Development of Stand-up Comedy as a Genre". When the depth of stand-up comedy becomes irreducible to mere happiness, it is framed as a way for the youth to escape from reality and achieve temporary relaxation. Further, stand-up comedy is characterized as a recommended solution to social tensions, a channel for emotional release or mental health management. To exemplify, reporting on the 2025 special comedy series produced by Xiaoguo, it interprets its meaning of its theme "TO GATHER, TOGETHER" as "to bring more contemporary young people together through comedy, helping them relieve the pressures of everyday life and adopt an alternative way of viewing the world." As recognized by the state, the best solution to negative sentiments is "to reconcile with the life," to which stand-up comedy provides a great platform of encouragement and guidance. For the state, stand-up comedy helps transform the aggressive, confrontational emotions into mild, private, and non-serious jokes, appeasing the public in the sea of laughter.

As one of the most commonly used strategies by the state media, depoliticization of stand-up comedy to a large extent reflects the state's approach to wider sociocultural life in current-day China. It projects the facade of diversity and openness while keeping a tight hold over matters of core concerns. It creates a limited room for communications among the agents and between agents and structure, while at the same time being actively employed as a new form of pressure valve that deflects deeper angers and inquiries into social problems and pacifies the unsatisfied population (Jacoby et al., 2024).

5.2 Moralization and Boundary-Making

The containment of the political functions of stand-up comedy goes hand in hand with more active intervention in the development of the industry. Facing the booming growth of industry, the state develops a moralized standard to distinguish between"good" and "bad" comedy. Oftentimes, the value of one stand-up show is determined by how positive and uplifting it is. "Laughter," "joy," and "happiness" are the recurring framing devices in the titles of articles of the discursive context "Development of China's Cultural and Entertainment Industry." For instance, a regulatory announcement further makes an affirmative claim: "stand-up comedy should create positive, healthy and progressive literary and artistic works with a high sense of social responsibility." Another comment also argues that "humor is a positive and uplifting way of growth." The emphasis on the delivery of positive values showcases the greater picture of the "zhengnengliang" (positive energy) discourse in Xi's China, which encourages the public to "stay in a positive mood and mind" and to achieve happiness by "changing one's attitude and mentality on the individual's end" (Chen and Gao, 2023). Interesting, for the state, a good comedy should not only be laughable and frivolous, but also convey profound meanings and inspire in-depth reflection. Despite the fact that the state does not specify its understanding of profoundness and in-depthness, it is evident that stand-up comedy has been supposed to play a role in value transmission.

Through its efforts to properly influence and educate the public, the state applies a mechanism of award and punishment with regard to stand-up comedy. On one hand, it sheds light on the stories that align with its current ideologies and narratives. For example, the media usually highlights the ordinary yet diverse background of comedians, portraying stand-up comedy as an inclusive platform for diverse forms of ordinary people's expression and the convergence of everyone's personal story. This certainly echoes the political narratives of "China Dream," which "[appeals] more to ordinary people's everyday narratives, languages, emotions (Chen and Gao, 2023). Those producers who currently stand in line with state-endorsed values, such as the Shanghai Xiaoguo Culture Media Company, receive strong and positive promotion by the state media. Apart from its monopolistic presence in every industry development article, Xiaoguo is further labeled as an "outstanding cultural enterprise" that sets the model for and leads the development of the stand-up comedy industry. Local government institutions often appear along with Xiaoguo to actively navigate the industrial current through cooperation, such as documentary production and tourist brand establishment. On the other hand, the state sets an authoritative tone for those who crossed the red line. For example, on May 31st, 2023, two weeks after the outbreak of the House Incident, a regulatory statement was released, announcing the strengthening of inspection on Lanzhou city stand-up comedy industry to "regulate the order of the performance market and maintain ideological security." Specific measures included summoning performers for regulatory talks, scrutinizing performance content and intensifying regular inspections. With the combination of rewards and sanctions, the state is demarcating between the "good" and "bad," the "positive" and "negative," "healthy" and "unhealthy," twisting the development of the stand-up industry into a not only controllable but also favorable direction.

Interestingly, while some material or ideological patterns can be observed in the state discourse, the exact boundary between what is allowed to say or not and what is sanctioned or not remain blurred. Optimistically, this enables a collective effort of demarcation by both the state and the social actors, implying a limited form of democratic negotiation. On the dark side, it allows the state to better navigate and mobilize its tools, acting arbitrarily to impose unsettling fear on society that eventually leads to self-censorship.

5.3 Developmentalist Reframing and Instrumentalization

Despite its harsh rhetoric on taboo and boundary, for most of the time, the state media considers the development of this industry as well-celebrated. Articles of the "Development of China's Cultural and Entertainment Industry" category are all titled by numbers, highlighting the numerical and geographical popularity of stand-up comedy. Moreover, the main body of those articles usually includes more specific statistics that demonstrate the strength of this rapid development, such as the total number of live shows and audience, the number of cities embracing this art form, the search and view counts of online shows, the box office revenue, etc.

The state media discourse promotes the industry development in two main directions: commercial market prosperity and cultural vitality. For the former, stand-up performance is characterized as "important drivers of offline cultural consumption" that will create "a new mode of consumption and socialization." The state also expresses appreciation to the cooperation between stand-up companies and the local city bureau of culture and tourism to boost a new wave of cultural economics. Thus, in the era of neoliberal economy, especially when confronting economic downturn and consumption shrinking, the state demonstrates full support to the economic values and market effects brought by the stand-up industry.

Concerning the latter, the state media's construction of stand-up comedy exhibits a national–civilizational ideological framework. Domestically, stand-up comedy is framed as the leading power of Chinese comedy culture that contributes to the formation of new popular culture among the youth generation. By acknowledging the cultural significance of stand-up comedy, the state integrates it into its broader narrative to foster common identity and strengthen social cohesion. For example, male comedians Jiang Zihao and Hahacao, who create their special series based on regional cultural elements, appear frequently in the state media. The popularity of their shows across different cities in mainland China is appreciated by the state as a marker of cultural exchange and integration, suggesting the image of collective orchestration. Moreover, stand-up comedy is further framed as a representative form of Chinese comedic culture on the international stage, particularly through media coverage of Mandarin stand-up performances abroad. The use of the phrase "chuhai" (overseas export) indicates a sense of cultural spread, adding a national-civilizational layer to the development of the industry. Specifically, when introducing Xiaoguo's circus show plan in North America in 2023, it contends that this move will "reintroduce a style of stand-up comedy that embodies stronger Chinese characteristics and a more pronounced attitude of Chinese youth to its birthplace." Besides, a special report is devoted to foreign comedians performing Mandarin shows in China, in which they share their passions and experiences to promote cross-cultural communications through Mandarin stand-up comedy. This focus on cultural influences corresponds to the state narratives of "Cultural Revitalization" and "Tell a Good Chinese Story," which call for the enhancement of national cultural pride by propagandizing the distinctiveness of Chinese history and culture. Overall, by applying developmentalist discourse, the state demonstrates its role not only as a silent guardian of boundaries and morality, but also as a powerful player that actively co-opts and instrumentalizes stand-up comedy for further purposes.

5.4 Reconstructing Feminine Stand-up Comedy Discourse

The state media's reconstruction of women's stand-up comedy specifically demonstrates a combination of the above-mentioned discursive strategies (depoliticization, moralization and boundary-making, developmentalist framing and instrumentalization). Firstly, in its official narrative, the origins, topics and definition of feminine stand-up comedy are restricted and rephrased. In a profile report of an all-female stand-up comedy performance series, the inspirations of their performance are reframed as "the small, awkward moments in women's everyday lives." The same theme is covered by another article, in which the topics of their performances are reduced to "kinship, love relationship, life and female friends." Again, the subversive elements are quietly suppressed, leading the overall message to a privatized and therapeutic direction. Not only is the political section of feminine stand-up discourse absorbed, but its overall narrative is also regulated to be always positive and morally-correct. Women's stand-up is cast in terms of "a more relaxed channel of communication and a means of stress relief" and female comedians are encouraged to "present women in different life situations expressing love for those around them and for life itself, thereby bringing warmth to a wider audience." No matter how negative the sources of humor are, the final production of comedy must be positive. In that portrayal of the all-female stand-up comedy series, phrases such as “spreading social positive energy” and “spreading uplifting social values” appear frequently, showing the state’s cautiousness in encircling the surge of feminine discourse within its ideological territory.

Secondly, similar to the state’s general gender policy, the media tends to use ambiguous and overgeneralized terms in place of direct reference to the phrase “feminism.” Instead of understanding the influences brought up by women’s stand-up comedy as a systematic resonance with strong ideological significance, these articles refer to them as “nüxing shijiao” (female perspective) or “ ‘ta’ liliang” (“her” power), trivializing the collective intellectual wave into individualized experience. At the same time, when talking about the all-female stand-up comedy series, the state media always refers to the audience as “jiemei” (sisters) or “guimi” (girlfriends). By excluding reference to male audiences and denying the broader social significance of women’s stand-up, this framing implicitly constructs the discursive space created through feminine discourse as a distinct and separate sphere alongside mainstream society—one that may introduce an alternative perspective, but is never expected to enter or be integrated into the dominant social arena. Together, the confrontational and disturbing parts of feminine discourse are cleverly evaded through the twists in interpretive angle, placing the state at an easier position to continue its facade as the endorser of women’s advancement.

One of the most important strategies utilized by the state to deflect from a socially provocative style of feminism is post-feminist discourse. Theorized by McRobbie (2007), post-feminism is defined as a cultural trend since the 1990s that dilutes and individualizes the momentum made by the second-wave feminism “by means of the tropes of freedom and choice.” She argues that, in the contemporary sociocultural space, equality has been seen as already achieved and debates of feminism are out of date. Thus, in the era after the historical struggles of feminism, women, particularly the young women, are invited to believe that they have equal and absolute freedom and choice “to compete in education and in work as privileged subjects of the new meritocracy” (McRobbie, 2007). In this context, while the society appears to “be engaging in a well-informed and even well-intended response to feminism,” the persistent structural and material problems are ironically ignored and despised, leading to the undoing of feminist efforts made by our predecessors (McRobbie, 2007). People.cn evidently captures this nuance, understanding that this can be used as an advanced strategy for the state to discipline the contemporary feminine discourse. For example, the phrases “growth” and “dreams” are main themes of women’s stand-up comedy to be written into the headline. In the coverage of the rising female presence in the stand-up industry, it takes great appreciation of the courage of these women to “break the dilemma and actively navigate their own lives” and “chase their dreams.” By doing so, the state affirms its allegiance to women’s empowerment while deflecting the focus from the unequal structure that this meritocratic narrative is built upon. Moreover, this conditional recognition of self-strengthening women whose successes were achieved through the official ladder can further serve as a basis for the state to blame discontented individuals for not trying hard enough and thus create divisions within the women’s group. To exemplify, the state actively engages with the individualistic narrative that frames individual efforts and characters as the sanctioned path to women's empowerment. Almost all the adjectives used to describe a so-called "new era woman" imply the central role of self, such as "self-confident," "self-loving," "self-disciplined," "self-autonomous," "self-assured" and "rational." The emphasis on individual empowerment resonates with the state's intentions to trivialize gender problems and privatize feminism: in its twisted rearticulation of feminist struggles, it undoes feminism as a collective and organized social movement.

Finally, not only does the state employ multiple discursive strategies to obscure the unsettling part of feminine stand-up comedy, but it also directly instrumentalizes and co-opts other parts of it to help reproduce its grand policies and narratives. A 2025 cultural industry annual report mentions commercial stand-up comedy as an important development of the year. Interestingly, for this report, all comedians raised as examples are female, unlike the disproportional coverage of male comedians in most of the other articles. However, despite their presence as the representatives of this industry, the delivery of their performance content has been saliently re-articulated. Comedian Fangzhuren, whose performances revolve around her fight against and breaking-away from her abusive husband in an arranged marriage, is characterized only by her rural identity. Comedian Xiha became famous for rallying the abandonment of silk stockings as the required components of the female flight attendant uniform from a former stewardess' perspective, igniting a social debate about the standard of beauty in career settings. However, she is highlighted for her contribution to demonstrate the diversity of all walks of life. This recasting of focus also occurs to Comedian Xiaopa, who satires on her personal background with an abusive and irresponsible father who married six or seven times. Instead of delivering her insightful attack on the patriarchal family and social system, the article stresses her geographical identity as being from Uyghur Xinjiang. All of the three coverage deliberately evades the contentious elements of their discourse and twists them to serve state narratives of demographic expression and geographical harmony.

As for the special portrait of female comedians Zhang Hui's stand-up series, the entire article, from the title to the body, is devoted to introducing the promotional effect of her performance on the state anti-smoking campaign. It highlights her cooperation with China Youth Net, an organ directly operated by the CCP, to introduce a tobacco-control public service segment in her profile show. For Zhang's show that corresponds to the state interest, it is endorsed as the leading example of stand-up performance that "extends the social values of comedy." In contrast, only one ambiguous sentence accounts for the feminine part of the content, commending her continual efforts in "cultivating women's empowerment."

Another special portrait is devoted to Huoguo, a female comedian who used to be a border police officer in Southwestern China. For her first performance on the online stand-up programme Stand-Up Comedy and Friends, she shared about how she attempted to break gender stereotypes toward policewomen by outperforming her male counterparts in military training and how she once heroically protected girls from harassment by a man at a local festival. By satirizing her pronoun as "nü jingcha shushu" (female "police uncle"), she implicitly revealed the gendered assumptions embedded in the colloquial expression "police uncle," a common way of addressing police officers in China. The portrait report on People.cn directly references to this occasion by using her lasting line "I have my own police story" as the title. The nickname "nü jingcha shushu" is mentioned, but no further interpretation is provided. Instead, the entire article clearly focuses more on her identity as a police officer, rather than as a woman in a male-dominated profession. Nothing related to her heroine image or experience as a protector of girls and women is covered. Alternatively, she is portrayed solely as a kind and helpful police officer who actively utilizes stand-up comedy as a creative way of promoting legal awareness and knowledge to the public. This moralization that constructs her as a model of positive energies pacifies the subversive, gendered parts of her image and expressions. What is more, her identity as a public servant is employed by the state to further instrumentalize stand-up comedy. Recognizing the support of the local police department to Huoguo's exposure in public, the article subsequently highlights a series of efforts by the police to "strengthen public legal education and mass work" via stand-up comedy and short videos. By doing so, the state not only demonstrates its symbolic affinity with the mass cultural trend but also substantially inserts its presence in this newly popular socio-cultural arena.

In its response specifically to women's stand-up comedy, the state media actively mobilizes its toolbox of discursive strategies. Through depoliticization, moralization and boundary-making, developmentalist reframing and instrumentalization, feminine stand-up discourse is stripped of its structural and confrontational force, redirected toward therapeutic and post-feminist narratives, and selectively incorporated into state-sanctioned moral, developmental, and political agendas. In this sense, state media reconstruction of women's stand-up comedy reveals a broader pattern in the governance of gender discourse in contemporary China: selective recognition is granted at the cost of political dilution and ideological containment.

6 Conclusion

This study contributes to the current study of Chinese feminism and state-civil society relationship by offering a state perspective to the development of commercial stand-up comedy and feminine discourse in contemporary mainland China. By analyzing the negotiation and reconstruction process conducted by the state media, it reveals a dual and nuanced relationship between the Chinese authoritarian state and civil society. On one hand, the state, acknowledging the salient presence of sociocultural life driven by market power and popular trends in the post-socialist era, seems supportive and open to new changes. However, the state continues to closely inspect and carefully contain it from developing wildly. Employing discursive strategies of depoliticalization, moralization and boundary-making, and developmentalist framing and instrumentalization, the state not only adopts implicit disciplining by rearticulating the origin, nature and supposed value of stand-up comedy and but also actively punishes and co-opts the development toward its intended direction. While most of the previous literature recognizes the potential capacity of stand-up humor in embodying upward communication and negotiation with the state, the analysis of the state's reaction concludes that this dynamic remains delicate. Granted that the (women's) stand-up discourse has created a stronger momentum that has become so entrenched and wide that the state cannot root it up, the state retains a high level of capacity in reshaping public understanding of this development.

This study is subject to several limitations. First, due to the complexities and lack of a unified theory in the conceptualization of Chinese feminism, this study tends to take the Western liberal-style feminism as the comparative model, which risks falling into the trap of Western centrism and thus obscures the historical and socio-cultural specificity of Chinese feminist practices. Second, the study is based on a dichotomous relation of state media versus female comedians in their claims of feminine discourse, which might fail to give a comprehensive picture of other factors, such as the diversity within the female comedian group, the divisions in public opinion toward feminism and the role of the market. For instance, the study does not fully account for the possibility that state responses are shaped not only by ideological considerations but also by prevailing public opinions, especially from the segment of the population that stands against feminism. Third, there is a restricted availability of publicly released state materials on this topic, which may limit the comprehensiveness of the analysis and undermine the external validity of the findings. Fourth, analyzing the interaction from a relatively static perspective, this study might overlook the contextual specificity and temporal evolution of these dynamics: some narratives might be tolerated at one moment but become strictly prohibited at another moment. Overall, my study can be the very first step that inspire further inquiries and questionings in this field. For example, one can further explore how female comedians confront and react to the messages of regulation indicated by state media or informed by state institutions and therefore shape the continuous negotiative dynamics. Besides, more attention can be devoted to the tensions that emerge when public opinions are divided, potentially into the conservative and progressive groups of gender views, and how the state makes decisions not only based on ideologies and policies but also the need to cleverly establish its role in the eyes of the public to implicitly shape the opinions in a favourable direction.

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TAIWAN: REPRESENTING MINORITIES TO GAIN WESTERN SUPPORT?

The Difficult Balance Between Diplomatic Strategies and the Actual Inclusion of Taiwanese Minorities

Asia Pacific Research Circle

Sciences Po

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Abstract

Amid the cross-strait tensions between China and Taiwan, the contemporary Western opinion of the conflict has tended to favor the Taiwanese, pro-independence side. This study employs a multi-methodological approach, incorporating literature reviews, state media analysis, and original data from surveys with Sciences Po students, to examine how Taiwan achieved this success. This paper explores how Taiwan centers the representation of minorities–specifically LGBTQ+, religious, and indigenous groups–in its public diplomacy and nation branding to secure Western liberal democracies' support, positioning itself as China's antithesis instead of its counterpart. However, there are clear problems with this geopolitical strategy, such as China's disproportionate economic and diplomatic reach, the instrumentalization of minorities for political ends, and the contradiction with the local population's more conservative attitudes. Therefore, this article attempts to answer the question of how Taiwan conciliates the representation of minorities in its identity to improve its standing in Western public opinion against mainland China, by (1) investigating the minority representation in Taiwanese state media, (2) assess their reception by Western audiences, and (3) offer critical analyses of Taiwan's nation branding. Ultimately, this research provides insights into how the contemporary conflict between Taiwan and China is framed by the question of human rights and minority representation, contributing to already existing research on the topic while focusing on the public diplomacy approach instead of the formal diplomacy approach.

Keywords: Taiwan, China, public diplomacy, minority representation, Western public opinion

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1 Introduction

LGBTQ+ flags, pride parades, hijabis… In 2024, Taiwan released a promotional clip advertising the Taiwan Center for Mandarin Learning (TCML) network, in which these elements were showcased, promoting universal freedoms and rights. Taiwan is considered, especially in the Western World, as a heartland for freedom and human rights within East Asia, where authoritarian regimes are numerous. This idea was reinforced in 2019, when Taiwan (Republic of China, ROC) became the first Asian state of only two today to legalize same-sex marriage.

The emergence of liberal democracy on the island and the creation of the center-left Democratic Progressive Party (DPP) find their origins under martial law implemented by the Nationalist Party (Kuomintang, KMT), despite their illegal nature at the time, in the midst of the infamous "White Terror" period, which ended in 1987. Since the DPP officially came to power in 2000 with President Chen Shui-Bian, putting an end to 91 years of KMT rule, it has implemented a social liberal agenda promoting increased tolerance for minorities, including but not limited to religious, LGBTQ, and indigenous groups. Its political strategy around human rights is notably foregrounded in official promotion clips. These reforms led to an evolution in the Western perception of the island, including in Western popular press, in opposition to the authoritarian People's Republic of China (Ogier, 2023). In the midst of the tense questions of Taiwan's sovereignty, the ROC itself has not explicitly led a proactive policy to obtain a *de jure* independence. Instead, in the last three decades, it has focused on broadcasting a positive image of itself to the Western world, using minority representations and defense of human rights, while China's image was declining by the increased international scrutiny regarding its domestic policies (Iselin, 2025).

It is therefore essential to understand how Taiwan is and has been shaping its public image as a beacon of human rights in the East, despite having been ruled by an oppressive military dictatorship 39 years ago, and the dissonance with the actual values of the local population. Most importantly, it is crucial to analyze how effective this new image of Taiwan is in increasing Western support for the island in the context of a growing threat of its military invasion by the People's Republic of China.

On the other hand, this promotion of human rights has been critiqued for being purely for political purposes (Shih, 2007, p. 15). Taiwanese minorities simultaneously denounce an instrumentalization of their representation by the DPP government to gain international recognition, all while fighting for Taiwanese sovereignty to try to protect their rights domestically (Chen-Dedman, 2022). A notable phenomenon can also be observed amongst the wider Taiwanese public, with a great part of the population's strong attachment to traditional values and attachment to past authoritarian figures conflicting with state officials promoting an idealized image of a free, liberal Taiwan to an international audience.

Therefore, this article will attempt to answer the question of how Taiwan conciliates the representation of minorities in its identity to improve its standing in Western public opinion against mainland China and to develop a more inclusive society at the domestic level.

What can be observed is that most of the academic articles up to this day on Taiwan's sociopolitical climate have mostly focused on studying in isolated ways either Taiwan's democratization or localization processes, or the current situation of the minorities there. This article will therefore contribute to the literature on Taiwan's current geopolitical strategy by exploring the correlation between (1) the foregrounding of human rights in the last 30 years of governments in Taiwan, through a unique analysis of Taiwan's recent communication to the Western popular audience, and (2) the island's ability to gain international popular support, while (3) simultaneously observing the dissonance of the strategy with Taiwan's local population and how local minorities actually consider this dissonance.

2 Literature Review

The existing literature on the topic has acknowledged an instrumentalization of the minorities by Taiwan, with a strong emphasis on LGBT groups. However, the analyses of the Taiwanese LGBT discourse mostly understand it as a way for Taiwan to gain visibility in institutional spaces where the island is normally excluded (Conway & Edenborg, 2025; Nai-chia & Fell, 2021). Nai-chia and Fell (2021) argue that the DPP government uses Taiwanese LGBT NGOs as a backdoor to make Taiwan enter United Nations summits, while the state itself does not have a clear agenda on LGBT rights promotion. Conway and Edenbourg (2025) study Taiwan's LGBT discourse from a similar perspective, understanding the LGBT cause as a means for Taiwanese diplomacy to engage in elite-to-elite relations with Western diplomats. Therefore, even in recent years, Taiwan's use of minorities is still understood as targeting Western countries at the state level, without accounting for the Western popular audiences.

Given the emergence of Taiwanese state-created videos on Western mass media during recent years, we decided to study Taiwan's foregrounding of minorities representations from a public diplomacy and nation branding perspective, aimed at popular audiences rather than state elites. Kerr (2013, p. 354) defines nation branding as "the application of corporate marketing concepts and techniques to countries, in the interests of enhancing their reputation in international relations." In Taiwan's context, the strategy of nation branding is marketing human rights and minority representation, especially in the Western interpretation of the terms. To reach foreign popular audiences, nation branding can be associated with public diplomacy, defined by Jan Melissen (2005, p. 8) as a strategy of communication directly targeting foreign popular audiences to promote a country's values, for its own interests. Contrary to traditional foreign policy, public diplomacy differs from both its targets and authors. Whereas foreign policy focuses on the dialogue between state officials, public diplomacy rather targets the general public of foreign societies, aiming to influence their perceptions of a given country. It also relies on a multitude of actors, especially NGOs and local networks in target countries, described by Melissen (2005, p. 12) as the most effective and contemporary way of exercising public diplomacy.

3 Methodology

The minority groups studied are members of the LGBT+ community, Muslims, and indigenous populations. We decided to consider these groups based on their proportion in the population, their usual under-representation in politics and history, as well as the current trends in the Western world to increase their representation in society.

To evaluate the representation of Taiwanese minorities as part of Taiwan's public diplomacy strategy, we based our research on communication media and events from Taiwan, emanating either directly from its government or from civil society actors, such as NGOs, affiliated with Taiwan. As our research aims to study the representation of minorities as part of an international strategy directed toward Western people, we decided to only consider media and events primarily designed to target Western popular audiences.

To connect the use of minorities to a broader strategy, we evaluated the weight and current trends of Taiwan's public diplomacy strategy by collecting budget plans of the Ministry of Foreign Affairs (MOFA) and the Overseas Communities Affairs Council (OCAC), available in Traditional Mandarin Chinese, to observe the institutional spending and attention allocated to the implementation of this strategy, as well as its official direction and expected results. These plans date from between 2013, under KMT president Ma Ying-Jeou, and 2026, under DPP president Lai Ching-Te, and have been neglected by the recent English academic literature on Taiwan.

Then, to assess the efficiency of Taiwan's strategy, we collected surveys from the current academic literature, enriched with interviews and surveys that we conducted with students of Sciences Po, Le Havre Campus. To minimize potential bias, such as social desirability bias, respondents were not informed of our precise research topic throughout the interview. This approach was maintained to ensure objectivity regarding the geopolitical Taiwan-China tensions and to avoid inadvertent influence.

Finally, to evaluate the actual involvement and situation of the local Taiwanese minorities used in this strategy, we relied mostly on academic resources enriched with interviews conducted with locals. We then linked these observations to the strategy used by Taiwan toward Western audiences to assess how they contrast and complement each other.

4 Analysis and Findings

4.1 The Strategic (Over)Representation of Taiwanese Minorities Toward Western Audiences

The representation of minorities in Taiwanese media targeting the West has been mainly initiated by the Taiwanese government itself to enhance the country's image in the eyes of Western public opinion. Indeed, over the last five years, the MOFA and the OCAC published on YouTube multiple video clips, most of them available in English, French, and Spanish. These videos contain representations of minorities through symbols appealing to the Western popular audience. NGOs and civil communities have also participated in this reshaping of Taiwan's image by engaging more efficiently with the targeted audience directly on Western soil, contributing to a clear strategy initiated by the Taiwanese government.

4.1.1 A Trend Toward the Public Representation of Minorities Initiated by Taiwanese Institutional Actors

Taiwanese institutional actors adopted a strategy based on two main pillars: making use of strong symbolic elements, and expanding their representation to all spheres, including topics not directly linked to minorities.

LGBT people are the main minority group represented in Taiwanese institutional media directed toward the West. Taiwanese institutions use in their videos strong symbols and terminologies linked to the movement that are easily appealing to Western audiences. In 2021, a crowded LGBT pride parade is displayed in the middle of a video published by the MOFA, easily identifiable by the Western audience thanks to a giant rainbow with the LGBT flag's colors (MOFA, 2021b, 05:15). Since this video, the appearance of the LGBT community became generalized and systematically accompanied by comments explicitly emphasizing Taiwan's inclusivity. In 2023, the MOFA released two videos in which LGBT flags and pride parades appeared, with either textual or voice comments reminding that Taiwan was the "first country in Asia to legalize same-sex marriage" (Trending Taiwan, 2023b), explicitly valuing its pioneer position. In this way, Taiwan aligns itself with Western democracies, which were the first to legalize same-sex marriage in the world. The use of these strong symbols allows the Western audience to easily identify with Taiwan, and therefore identify it as sharing with them common values and fights.

Figure 1
People holding up LGBT posters and flags with common Western slogans for Pride and the Black Lives Matter movement

Note. From The Tenth Trending Taiwan Short Film Competition Has Launched! [Video recording] by Trending Taiwan, 2024, YouTube https://www.youtube.com/watch?v=ejosadawnUo

The image built by Taiwan extends its inclusivity to religious and ethnic minorities, using the same aforementioned strategy. In 2023, the MOFA displayed a mosque easily identifiable with its minaret, and images of an Islamic religious office (MOFA, 2023b, 02:32), accompanied by the strong term "diversity" appealing to Western audiences. The next year, the OCAC used a stronger symbol by representing four women in the street wearing the hijab within the first minute of its video (OCAC, 2024, 00:40). The image, which progressive Western audiences could easily connect with, was completed by an explicit voice comment: "Taiwan's society supports freedom in economics, academics, speech and religion," aligning it with progressive Western values and movements. Indigenous people, however, lack symbols to which Westerners can easily identify. In 2023, a video named "To Equality" published by Trending Taiwan associated the representation of indigenous people in their traditional clothing with the appealing key term of "equality." The comment integrated in the video said, "We are all equal here and everywhere" (Trending Taiwan, 2023a), explicitly framing Taiwan as inclusive in the eyes of Western audiences.

Figure 2
Four hijabi women in the streets of Ximending

Note. From *TCML The Place to Be for Learning Mandarin* [Video recording], by OCAC, 2024 *https://www.youtube.com/watch?v=O_5R9nnOLZs*

For the Paris Olympic Games in 2024, the MOFA released a video named "Taiwan: Win over the World," in which athletic performances of Taiwanese athletes were celebrated throughout the video (MOFA, 2024b). What is surprising to find, however, is images of a large crowd holding pride flags in the first 30 seconds, between two sports clips (MOFA, 2024b, 00:23), consistently reminding the audience about Taiwan's values, even in a field without any direct link to these questions.

Through these videos, Taiwan actively mobilizes its inclusive narrative to the Western public, thus making it appear as a fully inclusive society. Then, the objective one can expect in the long-run is to make people immediately associate Taiwan with inclusivity and Western liberal values.

4.1.2 Understanding this (Over)Representation of Minorities Within the Recent Shift of Taiwan's Strategy Toward Public Diplomacy

But what may Taiwan expect from the inclusive image it is shaping? Since the adoption of the 2758 resolution by the UN General Assembly recognizing the People's Republic of China (PRC) as the legitimate representative of China, the Republic of China (ROC) based in

Taiwan lost most of its diplomatic recognition from Western states. This forced diplomatic isolation becomes an issue since the Taiwanese nation is under the increasing threat of a military invasion by China (Chen-Dedman, 2022) in the name of "reunification", as reminded recently in PRC President Xi Jinping's 2026 New Year address (Xi, 2025). Taiwan is therefore facing an urgent need to strengthen relations with allies to secure support for its survival as an independent actor, whether it is only to dissuade China, or to receive actual military support in the case that the invasion would happen.

The Taiwanese Mainland Affairs Council 2019 Report calls for rapprochement with "like-minded countries to jointly counter the CCP's actions" (Mainland Affairs Council, ROC (Taiwan), 2019, p. 36), a mission that the MOFA takes seriously. Analysis of its annual budget plans from 2013 shows that the main spending priority of the institution has been to deepen partnerships with foreign countries to build alliances (MOFA, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021a, 2022, 2023a, 2024a, 2025). If, under Ma Ying-Jeou's KMT presidency, marked by closer relations to China, the main objective behind international alliances might have been to develop Taiwan's economy and political reputation (Lams & Liao, 2011), since the DPP presidency of Tsai Ing-Wen, the tumultuous cross-strait relationship clearly suggests that these rapprochements aim at generating political support for Taiwan, against a threatening China.

What is interesting to see is the recent shift in the means Taiwan uses to achieve this objective. From 2013 until 2018, the priority was to "consolidate diplomatic relations with allied countries" by "deepening friendship with high-ranking officials of friendly nations" (MOFA, 2017, p. 7), in a classic form of formal foreign policy targeting the political elite in charge, studied by the existing literature. However, in 2018, the year before Taiwan legalized same-sex marriage under Tsai Ing-Wen's DPP presidency, the MOFA's strategy shifted to embrace public diplomacy as its main priority, no longer targeting the heads of state directly, but rather the general population. Analysis of the post-2019 budget plans shows that the priority is now to "produce and promote national conditions and documentaries to enhance Taiwan's international image" and to "promote important national policies and soft power, create a friendly public opinion environment and strive for international recognition and support for Taiwan" (MOFA, 2018, p. 8). The 2026 budget plan even explicitly mentions the term "public diplomacy" as the first spending priority (MOFA, 2025, p. 9). Taiwan's strategy can now be defined in three steps: (1) selectively promoting domestic characteristics and policies that can value Taiwan's image, (2) thereby forging a favorable image of Taiwan for the popular audience, and (3) to collect in return international support for Taiwan.

The representation of minority groups by Taiwanese actors toward Western audiences fits perfectly within this strategy. (1) Taiwan massively represents symbols of minority groups, and emphasizes domestic actions, such as the legalization of same-sex marriage, that value its image as an inclusive country. (2) These strong symbols enable Western audiences to connect their own experience to Taiwan and thereby consider it as sharing common values with the West, generating a positive image of the former in their mind. (3) In return, it is expected that this positive image generates first popular support for Taiwan's cause and, more importantly, acts as a relay to reach Western states' officials, indirectly triggering official support for Taiwan in its fight for survival.

4.2 The Mixed Success of Taiwan's Human Rights Diplomacy

In general, Taiwan's human rights diplomacy has seen success in winning over Western public opinion. This is most pronounced in the liberal Anglo-Saxon world of the United States, Canada, United Kingdom and Australia, the same countries actively promoting the defense of human rights. The public support for Taiwan in these countries has reached more than a 50% majority (Huang & Clancy, 2025). In France and Germany, the two largest European Union economies and one of the most powerful NATO members, the public opinion has been also mostly positive towards Taiwan. But this is balanced with economic pragmatism and strategic European autonomy in the face of the China-US blocs. Table 1 shows the different perceptions of Taiwan across Western states.

Table 1: Western Public Support For Taiwanese Public Diplomacy

Country	Public support for Taiwan (Huang & Clancy, 2025)	Reasons
Australia	71%	Taiwan seen as friendlier compared to Chinese Imposed Tariffs caused a loss of 3 billion Australian dollars in 2020 to 20 billion Australian dollars in 2022 (Wickes 2024)
United States	65%	Chinese assertiveness in the Taiwanese Strait (Pan H-H 2023)
United Kingdom	60%	BBC media reporting largely influences public view of China being a threat to AUKUS interests in Indo Pacific, making Taiwan seem like an ally (Pourrashidi et al., 2023)
Germany	50%	Need to Balance between Economic Interests with China and Ideological Alignment with Taiwan 65% of German economists see that China is both an economic partner and competitor. 51% of German economists see China as a geopolitical adversary in areas such as its perceived aggression against Taiwan, whose diplomatic discourse has been filled with human rights (ifo and Frankfurter Allgemeine Zeitung Economists Panel, 2024).
France	49%	France Inter portrays Taiwan as a power that "does not fear a Chinese invasion" in an "unequal

		power dynamic between 24 million inhabitants on side and 1.4 billion on the other." Tsai positively portrayed Taiwan and France having shared values in "freedom, democracy and human rights" as "shared values". (Haski 2024) Alignment constrained by Macron's emphasis of strategic autonomy and refuse the power logic of US vs China (Le Monde & AFP, 2023).

4.2.3 Assessing the Effect of Taiwan's Human Rights Diplomacy by Ourselves

Since the current quantitative literature has not explicitly surveyed the possible correlation between one's perception of Taiwan's inclusion of minorities and one's support for Taiwan, we decided to complement existing data by surveying Sciences Po students from the Le Havre campus to see their perception of Taiwan, particularly regarding the rights of minorities. 21 students responded, including Chinese, Indian, French, and European Union students. Even though the sample is small, we consider that it would be relevant to share the answers, while keeping in mind that Sciences Po students have a better understanding and knowledge of politics compared to a sample representative of France.

We decided to analyse in depth the European students' perceptions of Taiwan. The following graphs will thus consider 16 answers from European Students.

The survey was conducted in two parts: one part about Taiwan and the other about China. By comparing responses related to Taiwan and China, the survey examines whether the recognition of minority rights plays a more central role in shaping perceptions of a state.

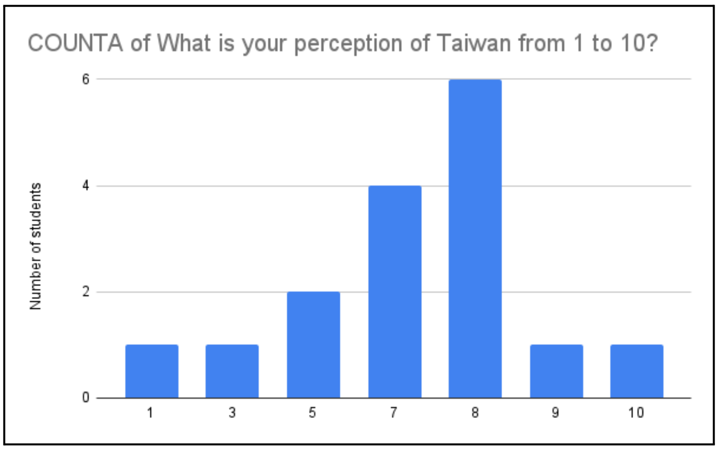

Figure 3. *Answer to the question: "What is your perception of Taiwan from 1 to 10?"*

According to the graph (see Figure 3.), European students have in general a good perception of Taiwan, with 12 students who responded 7 or more.

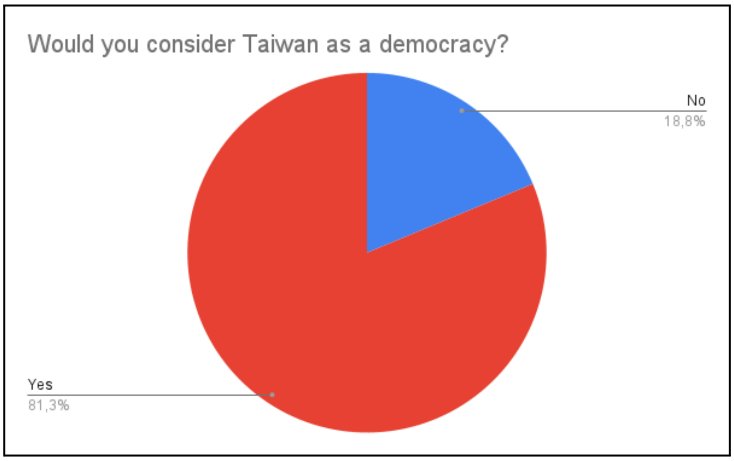

Figure 4. *Answer to the question: "Would you consider Taiwan as a democracy?"*

Responses (see Figure 4) show a relationship with the answers to the question: 'Would you consider Taiwan as a democracy?' Indeed, 72% of respondents answered yes, while 18% answered no. When looking more closely at individual responses, those who answered no tended to give a low score to their perception of Taiwan (1, 3 or 5).

Moreover, we asked students about "*How well [they thought] minorities [were] treated in Taiwan on a scale from 1 to 5?"* including LGBTQI+, ethnic and religious minorities. We then created a scatter plot to show the relationship between students' perception of Taiwan and their thoughts about minorities. Overall, the more students think minorities are well treated in Taiwan, the more positively they perceive Taiwan. However, based on this data, it is not possible to determine the direction of causality; the analysis only reveals a correlation between the two perceptions. It could be because students already perceive Taiwan positively that they consider the Taiwanese minorities well-treated.

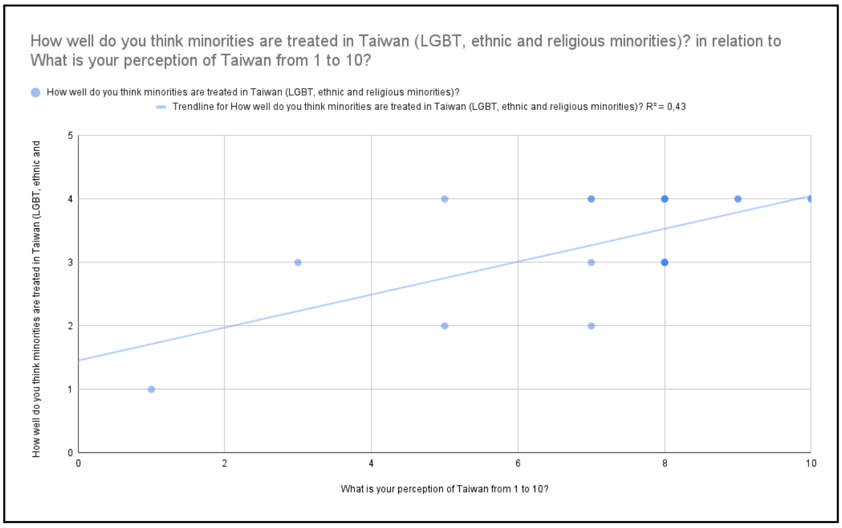

Figure 5. *Answer to the question: "How well do you think minorities are treated in Taiwan, in relation to What is your perception of Taiwan from 1 to 10?"*

We conducted the same process concerning China (see Figure 7). The purpose of this survey aimed to understand whether students link their perception of how minorities are treated to their overall perception of a country. The results suggest that students are more likely to associate minority rights with their overall perception of Taiwan ($R^2 = 0.43$) than with their perception of China ($R^2 = 0.29$).

Following our interviews, we noticed that students' points of view were clearly shaped by what they saw in the media. More than half of the students mentioned the gay parade events in Taiwan, as well as the same-sex marriage that was broadcast in some respondents' countries (in Europe). One respondent even said that "Taiwan is the best country in the world for LGBTQ+ rights," clearly showing how Taiwan's construction of itself as a pioneer for minorities' rights effectively entered the Western popular perception of the country. Respondents did not raise issues concerning ethnic or religious groups in Taiwan however. This may reflect a certain asymmetry in international visibility, while Taiwan's policies regarding LGBTQ+ rights have received considerable global attention, ethnic and religious minorities appear to be less prominently taken into account.

4.3 Investigating the Dissonance Between Local and Official Narratives

As demonstrated in Part I and Part II, this paper established the foregrounding of minorities in Taiwan's public diplomacy strategy and its effective reception by a Western audience. It also shows Taiwan's explicit marketization techniques to tilt international favorability towards Taiwan against China. This final part will aim to expose the many paradoxes and hypocrisies of this universally oriented agenda on human rights Taiwan has adopted since the 1990s, and trace the evolution of the reasons for this adoption, notably by exploring post-colonialist, feminist, and constructivist critical literature.

Taiwan is considered by many as a "success state," a true liberal democracy in Asia, ranked number 12 worldwide in The Economist's Democracy Index 2024 with a score of 8.78/10. It is also one of the only two "full democracies" in Asia, along with Japan, with a particularly high score of 9.41/10 for the category "civil liberties" (Democracy in Asia, 2025). On the other hand, China scored 2.11/10, ranked 145th worldwide, with a civil liberties score of 0.88/10. Taiwan's democratization post-martial law era in the 1990s thus can be objectively agreed upon to be successful.

However, this third section attempts to provide a different perspective, more critical of this so-called success in establishing liberal democracy in Taiwan. We will argue that despite trying to broadcast a universalist image of itself as defending human rights for political purposes, Taiwanese local society itself is still in disagreement with some liberal values, especially concerning minorities. Relying on critical theories, this section will also underline the geopolitical context of this emergence of a pro-human rights stance. Furthermore, it will demonstrate that this representation of minority rights is not only beneficial for Taiwan's national strategy, but also for local minorities to guarantee the protection of their rights, describing what we will call as the "double benefits of the (over)representation of minorities in Taiwan".

4.3.1 Human Rights and Minority Representation as a Political Tool to Assert Taiwanese Identity in the Late 20th Century

To understand the dissonance between the image the Taiwanese government advances of itself, and the actual sentiments of Taiwanese citizens, it is necessary to trace back the history of Taiwan from the establishment of the Republic of China to its democratization in the 1980s.

Historically, the Kuomintang's (KMT) legitimacy was rooted in its "anti-Chinese communism" claim as the rightful government of all China after the civil war ending in 1949. However, as the Cold War ended and the UN recognized the PRC, this ideological anchor weakened, forcing the government to find a new way to define Taiwanese identity domestically and internationally. Scholars like Chih-Yu Shih argue that democratization functioned as a populist identity strategy to distinguish Taiwan from China's authoritarianism (Shih, 2007, p. 17). Consequently, the official embrace of "universal" human rights serves primarily as a mechanism of differentiation rather than a purely internal drive for inclusivity (Shih, 2007, p. 4).

This instrumentalization is particularly evident in the treatment of ethnic minorities. For instance, while the Democratic Progressive Party (DPP) government aggressively promotes indigenous representation in its public diplomacy, a paradox exists: Taiwanese indigenous people, who make up over 2% of the population, tend to vote for the conservative KMT. This preference stems from historical tensions where indigenous groups felt exploited by the Hoklo–Taiwan and the DPP's primary ethnic base–viewing the current "indigenism" narrative as a superficial campaign strategy rather than a moral shift (Simon, 2010).

Ultimately, this anti-China branding continues to reinforce a national identity grounded in democratic values, especially in response to events like the 2019 Hong Kong protests and the 2022 Xinjiang human rights reports. By aligning with international norms, Taipei bolsters its global legitimacy and asserts its sovereignty through a "universalist" lens that highlights the lack of such rights in the Mainland.

4.3.2 Discrepancy Between the Image in Public Diplomacy and the Reality of Taiwanese Opinions

But, is the Taiwanese society as inclusive as it portrays itself to be? As stated in the introduction of this third section, this article aims to revisit the reality of the Taiwanese population's attitude towards human rights and minorities.

As we showed in the first section of this article, Taiwan does not hesitate to massively represent LGBT groups and foreground its pioneer position as the first country in Asia to legalize same-sex marriage in 2019 on all occasions toward the Western public. However, what the Taiwanese actors, governmental ones as well as non-governmental ones, refuse to display in their public image is the process through which these rights were granted. Indeed, in 2018, a referendum was organized in Taiwan following the country's supreme court decision during the previous year to judge the restriction of marriage to heterosexual couples only as illegal. The Taiwanese people were invited to answer the following questions: "Do you agree that marriage defined in The Civil Code should be restricted to the union between one man and one woman?" and "Do you agree to the protection of same-sex marital rights with marriage as defined in the Civil Code?" (Central Election Commission (CEC), 2018). 72.48% of the Taiwanese people supported the restriction of marriage to heterosexual couples only in the first question, and 67.26% rejected the protection of same-sex marital rights in the second question (Central Election Commission (CEC), 2018; Le Monde, 2018), meaning that the Taiwanese population in fact strongly rejected the legalization of same-sex marriage in the country. The legislation granting marital rights to same-sex couples was then passed through the Taiwanese Legislative Yuan (BBC, 2019), Taiwan's parliament, against the will expressed by the Taiwanese people. These historical facts, therefore, reveal strong tensions within the Taiwanese society and strongly challenge the image of a fully inclusive society that Taiwan seeks to portray in the eyes of Western popular audiences.

Beyond appearances, we should also suggest the debatable "illiberal" nature of Taiwan's regime, contrary to the majority opinion. Liberalism, by definition, respects differences and defends minority rights; however, under Taiwan's human rights practice, this difference is functional to the building of national consciousness. It works to such an extent that the need to be different from China prompts actions of discrimination (Shih, 2007, p. 8).

Shih effectively describes "how Taiwan [...] has attempted to change its human rights practices from those sympathetic with national security arguments to those in line with the so-called universalist understanding of human rights" (Shih, 2007, p. 17), leading to discriminations against the mainland Chinese, but also Southeast Asians, Muslims and Black people among others. A rudimentary construction of the Taiwanese racial hierarchy of immigrants can be 1) White and Japanese people, 2) other East Asians speaking some form of Taiwanese vernacular, 3) East Asians, 4) all other Asians, 5) people of color such as Black, Latino and Arab communities, and 6) Han Chinese who do not speak a Taiwanese vernacular (Kao & Liu, 2025; Li, 2025).

Firstly, there is no doubt that cultural racism is prevalent within Taiwanese society. Cultural racism is defined as the belief that there is a hierarchy of superior and inferior cultures based on biological ('racial') differences. In the Taiwanese mind, East Asians are not at the top of the racial hierarchy, so they experience relative inferiority, compared to White people (seen as socially and economically superior, more attractive), and compared to Black people (stereotypically perceived as more athletic, more attractive, and more willing to protest for their rights). Influenced by its postcolonial legacy and media portrayals of racial minorities, the Taiwanese have internalized a recognition of white supremacy and embraced the "model minority" myth (Li, 2025). A 2025 study has found that Taiwanese netizens are particularly vocal about their racism against Black communities, in order to avoid courtesy stigma of being associated with the negative perception of Black people by White people, and that by doing so they align themselves with dominant, White, norms (Li, 2025). Unfortunately, by doing so, Taiwanese people reproduce the very system that keeps them subordinate and racially marginalized in Western discourses.

The local Taiwanese's discrimination against minorities is not unique to the Internet, but also present in various domains. Rental discrimination against foreigners, migrant workers, indigenous Taiwanese and the elderly is widespread and explicit in Taiwan, and there are currently no laws protecting tenants facing these discriminations from landlords (TaiwanPlus News, 2023). There are multiple reasons for this: negative attitudes or worry towards language barriers (Kao & Liu, 2025), but also deep-rooted racial stereotypes, such as believing Black people are genetically inclined to be aggressive (Li, 2025).

On the other hand, Taiwan's authorities have also been found, numerous times, to be discriminatory against people of brown skin. Southeast Asians are among the most discriminated, faced with obstacles in their access to healthcare, employment, education, and community life. For instance, a case when an Indonesian man was not allowed to enter Taiwan, despite having the correct paperwork, while the numerous Japanese and South Korean tourists experience no issue, has triggered anger in Taiwan's foreign community (Turton, 2023). Since the opening of Taiwan to "New Residents"–a new catch-all census category for all post-1987 immigrants–one in every 33 Taiwanese residents today is a Southeast Asian migrant worker (Upadhayaya, 2025), yet these migrants have been stigmatized as "undesirable others" from "undeveloped countries." About one in four new immigrant workers said they faced job-related difficulties, concerning low pay and their lack of Mandarin proficiency (Global Taiwan Institute, 2025). Concerning the treatment of the Muslim community in Taiwan, testimonies say Taiwan is a friendly country for Muslims compared to other non-Muslim countries (Taipei wins, 2025). However, this doesn't mean discrimination against Muslims doesn't exist: a Malaysian student has reported being hostilely rejected by all restaurants where she applied for a job after asking if she could wear her hijab prior to accepting interviews (Thomson, 2023). These experiences underline the existence of a racial hierarchy in Taiwanese society.

This article thus tries to showcase the contrast between the island's presentation of itself as a vibrant democracy and oasis of human rights, and the reality of minorities' experiences in Taiwanese society, providing further proof of Taiwan's selective and hypocritical protection of human rights to serve its geopolitical and national interests. By aligning themselves with the Western, "universalist" definition of human rights, and simultaneously sidelining some minorities, Taiwan aims to further reinforce national identity and consciousness in its population.

4.3.3 The Double Benefits of the (Over)Representation of Minorities in Taiwan

Should, however, the Taiwanese minorities be considered as totally strangers to Taiwan's strategic representation of minorities in its public discourse? Should this strategy be considered as solely benefiting the Taiwanese government without actual benefits for the minorities represented? Such perceptions ignore that Taiwanese minorities benefit, to some extent, from Taiwan's strategic use of them in its public diplomacy. It could even be argued that minorities also weaponize the Taiwanese government in their interest. To study this process, we will mainly focus on the LGBT minority group in Taiwan.

Even though the Taiwanese society may not be as inclusive as portrayed, the LGBT community in Taiwan still enjoys privileged status and rights compared to other Asian countries as only two of them have legalized same-sex marriage. But, more importantly, the LGBT community in Taiwan enjoys rights that its counterparts in the PRC do not. Not only are same-sex marriages not recognized by law there, but the position of the LGBT community in society strongly varies over time (Amina Reem V. P. & Moolakkattu, 2023) in the context of an authoritarian Chinese regime (Nathan, 2003), in opposition to the Taiwanese democracy. Chen-Dedman (2022, p. 12) notes that Taiwanese LGBTs "seek to […] safeguard their rights as sexual citizens from the very real threat of authoritarian encroachment from Beijing". Indeed, since China repeats its will to "reunite" with Taiwan (Xi, 2025), the rights of the local LGBT community are seriously threatened in light of the local situation of the LGBT communities in the PRC. Taiwanese LGBTs have no guarantee that the rights they gained will be secured under a Chinese Communist administration of Taiwan. Therefore, it is in the highest interest of the Taiwanese LGBT communities to keep Taiwan out of the PRC's control, if the only price to pay for that is to be instrumentalized in Taiwan's public discourse toward the West, and to accept a framing of the Taiwanese society as much more inclusive than it is actually.

We conducted an interview online with a young Taiwanese lesbian woman based in Kaohsiung, Taiwan, who graduated from Wenzao University. She told us that:

> *"On the international level, Taiwan clearly understands that Western public opinion values human rights, democracy, and diversity. By highlighting the protection of minorities such as LGBT people […] Taiwan is able to distinguish itself from mainland China and present itself as a liberal and progressive democracy. […] The legalization of same-sex marriage has played an important role in shaping Taiwan's international image, especially in contrast to China's restriction on LGBT expression."*

Her words clearly show both the awareness of being represented by Taiwan in the pursuit of a political objective, but also the awareness of LGBT rights being threatened in China. It would then be wrong to believe that the Taiwanese LGBTs are not aware of their instrumentalization by the Taiwanese government. We can therefore consider their current situation within Taiwan's international politics is mainly a conscious and rational choice providing them with benefits, rather than a strategy to which they would be total strangers. If Taiwan wins support from the West against China, the LGBT minorities win the ability to protect their rights and culture.

Moreover, Taiwanese LGBT minorities could even be considered as active players, not only being used by the DPP, but using the DPP's political strategy for their own interest. Taiwanese LGBT minorities benefit from attracting support for Taiwan, as it allows the latter to remain independent from the PRC. But Chen-Dedman (2022, p. 11) notes that the LGBT communities' wish is to rebuild the Taiwanese identity to make it more inclusive as part of "multicultural nationalism". Here appears a convergence between the DPP's agenda to frame an inclusive image of Taiwan toward the West, and the agenda of the LGBT movement in Taiwan to build an inclusive Taiwanese identity. Accordingly, Chen-Dedman shows the picture of a youth participant in the 2020 Taichung LGBT parade, wearing an LGBT flag sticker saying "Taiwan is Super Queer. I'm Taiwanese, Not Chinese, and I'm Proud of It" near to a sticker supporting Taiwanese president Tsai Ing-Wen with the mention "2020: Tongzhi support Tsai" (Chen-Dedman, 2022, p. 10). Such actions from the LGBT community fully use the DPP's narrative of portraying an inclusive Taiwanese society on LGBT rights and othering China to gain Western support.

We should therefore see that the Taiwanese LGBT minorities are not only used in a form of instrumentalization by the Taiwanese DPP, but that they are, in fact, benefiting from, if not pushing for, the narrative constructed by the DPP for their own minority's interest. In this situation emerges what we call the "double benefits of the (over)representation of minorities in Taiwan".

5 Conclusion

Taiwan's strategic (over)representation of its minorities serves as a pillar of its recent shift toward public diplomacy. By foregrounding the rights of LGBT, religious and ethnic minorities, the Taiwanese DPP government is crafting a narrative of Taiwan as an inclusive democracy that stands in contrast with the authoritarian regime of the People's Republic of China. As our analysis suggested, this strategy relied on three steps : (1) selectively promoting domestic characteristics and policies that can value Taiwan's image, (2) thereby forging a favorable image of Taiwan among the popular audience, (3) to collect in return international support for Taiwan.

However, the success of this human rights policy remains nuanced and geographically contingent as we showed. While it resonates strongly in Northen Europe and the Anglophone world, where Western liberal values are more appealing, it faces more ambivalent or pragmatic reception in Western and Southern Europe due to competing economic interests with Beijing. Furthermore, our own survey and interviews conducted with Sciences Po Western students confirm a positive relationship between the perceived treatment of minority groups in Taiwan and the perceived image of Taiwan in general, suggesting that the latter's strategy may indeed have effect on Western audiences. However our data does not allow us to determine, at this stage, the direction of the causal relationship, therefore limiting our research.

Ultimately, our article reveals the difficult balance between Taiwan's representation of its society and the actual situation of the local minorities, resulting in a dissonance between what is shown and what is experienced, as the Taiwanese society appears to be less inclusive than what Taiwan suggests to Western audiences. Issues such as the massive rejection of same-sex marriage in the 2018 referendum are strategically forgotten and not mentioned at all to Western audiences, whereas Taiwan's status as a pioneer for being the first Asian country to legalize same-sex marriage is strongly emphasized. We should finally note that the Taiwanese minorities do not remain passive strangers to this dissonance. Instead, we showed the existence of what we called a "double benefit of the (over)representation of minorities in Taiwan". While the Taiwanese state uses the minorities to ensure its survival as an independent actor, the minorities take advantage of the narrative to secure their rights and realize their own wish of a new, inclusive Taiwanese identity, in the face of an increasingly threatening China.

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JAPAN AND TAIWAN'S DIFFERING PERSPECTIVES ON SAME-SEX RELATIONSHIPS

Comparing A Former Colonial Empire To Its Former Colony

Asia Pacific Research Circle

Sciences Po

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Abstract

On 24 May 2019, following the Constutitonal Court's landmark Interpretation No. 748 which ruled the Civil Code's exclusion of same-sex unions unconstitutional, Taiwan became the first country in Asia to legalise same-sex marriage. Japan, by contrast, remains the only G7 member without national legal recognition for same-sex couples. This is an anomaly considering the Japanese public's support for marriage equality which notably exceeds the measure recorded in Taiwan. This paradox is even more striking when seen in the context of the nations' intertwined histories. Taiwanese society and its institutions were shaped by Japanese colonial rule from 1895 to 1945, making it difficult to account for reasons why the former colony has surpassed the former coloniser on an issue widely regarded as a characteristic of democratic and social progress. This paper addresses this question through a comparative case study examining Japan and Taiwan's divergent paths across historical, legal, political, social, and cultural dimensions. It argues that this difference cannot be explained by a single factor but is rooted in constitutions, party politics and structures, civil society, and broader social concerns, all of which operate differently in each country. This paper adds to broader studies on LGBTQ+ rights in postcolonial democracies.

Keywords: Japan, Taiwan, same-sex relationships, same-sex marriage, LGBTQ+, colonization, colonial influence

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1 Introduction

On 24 May 2019, Taiwan celebrated its status as Asia's first country to legalize same-sex marriage. This legal milestone came as the result of a long journey of activism and after the passage of the Constitutional Court's Interpretation No. 748 on May 24, 2017, which ruled that the Civil Code's failure to allow same-sex marriage was a "violation of the Constitution's guarantees of both the people's freedom of marriage under Article 22 and the people's right to equality under Article 7" (Constitutional Court R.O.C., 2017). A year after the law came into force, by 2020, more than 3,500 same-sex couples were married (Yi, 2020). In a glaring contrast, Japan currently has no national law recognising same-sex marriage. It remains the only Group of Seven (G7) member nation that does not legally recognize same-sex couples (Gubbala & Miner, 2023).

This divergence is significant because both nations share similar democratic and economic trajectories in East Asia (Chung, 2021), yet their legal treatment of same-sex couples has taken different paths. Research shows that attitudes on homosexuality are strongly correlated with a country's wealth and level of democratization (Poushter & Kent, 2026; Loper & Petersen, 2026). Both Japan and Taiwan are economic powerhouses and developed democracies, yet only Taiwan has fulfilled this prediction regarding marriage equality. This difference becomes even more glaring considering data which presents a counter-intuitive reality. Recent surveys indicate that support for same-sex marriage is actually higher in Japan (around 68%) than the 45% support it has in Taiwan (Gubbala et al., 2023). The divergence is further complicated by their conjoined governance history. Taiwan's legal system was heavily influenced by Japan, during its colonization of the former from 1895 to 1945 (Burns & Brooks, 2014). It is therefore challenging to explain why the former colony has adopted what is often seen as a marker of modernity and progress, surpassing the former colonizer in the process.

Thus, this research paper seeks to examine Japan and Taiwan's differing perspectives on same-sex partnerships considering that Japan was a former colonial empire and Taiwan its former colony. (1) The first section establishes the historical and cultural background of these two countries and their perspectives on same-sex relationships prior to the 19th century. (2) The second section adopts a legal and political perspective to the question, looking at the shared legal frameworks during the 50-year colonial era then analyzing the progressive divergence in laws and legislations. (3) Finally, the last section adopts a social and cultural perspective, analyzing the influence of philosophies such as Confucianism and the concept of homonationalism.

2 Methodology and Limitations

To address this question, this paper adopts a comparative case study methodology. Specifically, it uses a comprehensive review of existing scholarship and research data to examine the divergent path taken by the two countries.

While this qualitative approach allows for an in-depth analysis, its limitations are to be noted. Firstly, the extensive use of qualitative research and the limited use of quantitative data adds a subjective dimension to the paper. While great attention was put into cross-checking, the analysis was still influenced by the subjective interpretations of the sources used. However, the author has aimed to maintain a neutral perspective on the issue. Secondly, the lack of sources on lesbian relationships limits the paper's coverage of both gay and lesbian relationships. This lack of studies on women can be explained by the historical and patriarchal tendency to focus on men and male relationships in the field of research.

Thus, it is to be considered that this paper analyzes same-sex relationships as one category and does not differentiate gay or lesbian relationships. As such, it uses the word 'homosexual' in its etymological sense, to designate a relationship between two humans of the same sex. Hence, by 'homosexual relationships' are not only referred to partnerships between two gay men but also between two lesbian women and any other types of unions that may involve two people of the same-sex. The same applies to the terms 'gay' or 'gay rights movement.' Additionally, while this paper often makes mention of the LGBTQ community and its rights, it primarily seeks to focus on same-sex relationships rather than gender identity. Hence, 'LGBTQ' is mainly used as an umbrella term for homosexual individuals and same-sex couples.

3 Literature Review

To begin with, the historical part relied on Liang's "We are Adjus: The Diverse Gender Identity of the Paiwan People" to analyze Taiwanese indigenous tribes' perceptions of same-sex relationships. This source was used with Wong's "Colonialism and Indigenous Peoples of Taiwan" to examine the changes brought by the West and the Japanese. Another significant source was Crampton's Homosexuality & civilization on the historical evolution of LGBTQ+ rights in Japan, from the precolonial period to today, and the consequences of Western influence.

In the second part concerning the legal and political perspectives, Fairbrother's "Long Read: A History of the Japanese LGBTQ+ Community" as well as Loper and Petersen's "The evolution of LGBTQ+ rights in Singapore, Hong Kong and Taiwan" were used to examine the similarities between Japanaese and Taiwanese policies on same-sex relationships, prior to the colonial era and up until today. Furthermore, Taniguchi's article on "LGBTQ human rights in Japanese laws and policies", Boon's article on "Contemporary LGBTQ+ Politics in Japan: Policy Issues, Discourses and Developments, and the role of Foreign Actors" and Loper and Petersen's article were examined to recognize the cause of the legal and political divergence, which includes but are not limited to the influence of the ruling political party and the role of civil society.

The third part regarding the social and cultural perspectives relied on Tang's "Legal recognition of same-sex partnerships: A comparative study of Hong Kong, Taiwan and Japan" to examine the implications of kinship systems in recognizing same-sex relationships and marriage. This part also used Puar's *Terrorist Assemblages: Homonationalism in Queer Times* which argues that liberal states selectively use queer communities to project an image of progress.

4 The Historical Perspective

4.1 Prior to the westernization of Japan and the colonization of Taiwan

Long before Western influence entered Japanese territory, same-sex relationships in Japan were not uncommon as gender was not a criteria to define sexuality. Traditional Japanese stories such as the Tale of Genji, dating as far back as the 11th century, follows the story of a man who sleeps with a woman's brother as a way to take revenge. Many folklore tales also mention "monastic homosexuality", which refers to homosexual relationships between men within monasteries (King, 2020). There was also a word referring to sex between male monks: "nanshoku". The fact that women were excluded from monasteries only made this practice more common and tolerated by monks. As Buddhism spread over Japan, nanshoku also spread to other layers of Japanese society. Notably within the samurai class, who often maintained relationships with "wakashu" – young males dressed in feminine clothes with whom they engaged in homosexual sex. This practice was also seen as a rite of passage for the adolescents (Fairbrother, 2023). Furthermore, with the Tokugawa shogunate's (post-1600 CE) "heinō bunri" policy which gave rise to a new social group: the bourgeoisie, composed of merchants, artisans and urban people, urban environments became increasingly dense with male. As an effect, same-sex relationships were encouraged. For instance, it was considered normal for young men to be sex workers serving both male and female customers (Crompton, 2006). It is also during this period that the first depictions of lesbian relationships were found. However, these were mostly made for the entertainment of men. Otherwise, lesbian practices were not accepted (McLelland, 2005). However, it can be assumed that lesbian practices existed before the Meiji era, especially as in the Shogun's harem, neglected women would comfort themselves with other women (Francoeur et al., 1995).

Up until the late 19th century, Taiwan was under Chinese rule. However, as the Chinese legal system did not cover the topic of homosexuality, the sexual diversity of the Taiwanese indigenous peoples was accepted in the overall societal system. Additionally, Chinese religious and mythological traditions significantly influenced the diffusion of LGBTQ+ culture in Taiwan. For example, the Tu'er Shen myth, also known as the Rabbit myth, is considered to be the foundation of LGBTQ+ traditions in Chinese-Taiwanese spirituality. The story is about Hu Tianbao, a man who falls in love with an imperial inspector from the Fujian province but was caught red-handed observing him while he was in his bathroom and had to confess his feelings to justify himself. However, as the man had invaded the inspector's privacy, on top of the fact that his love was unrequited, he was sentenced to death. Once he died, it is believed that the gods were touched by his pure love and made him the Rabbit God. The choice of the rabbit as a symbol of the LGBTQ+ community is because the Chinese word for it – "tuzi" – has a very similar pronunciatin to "tongzhi", which is a slang to designate gay people. Some indigenous Taiwanese communities worshipped this god. For instance, the Amis community, which is the biggest and oldest Taiwanese autochthonous group, has made its rituals from this mythological figure. For some indigenous communities, same-sex relationships was an essential component of the group's collective identity and its "understanding of life." For example, the Paiwans' believe that sexual diversity is constitutive of their group. However, they refuse to use the acronym LGBTQ+ because of its highly Western connotation, and instead, use the word "Adju" (Liang, 2020).

4.2 Following Western influence and the Japanese colonization of Taiwan

The Meiji restoration (1868-1889) marked a breaking point in the perception of same-sex relations in Japan through the introduction of conservative Western values in Japanese society. This only reinforced the prior influence of Western missionaries who had translated the ten Commandments and condemned homosexual practices between Japanese monks by adding the "sin of Sodom" (Crompton, 2006). The aim of the Meiji restoration in itself was for Japan to gain recognition from Western countries by "absorbing Western learning". Thus, the intolerance of homosexuality was one the values that Japan had absorbed (Leupp, 1995). Homosexuality was thought as improper for the modern nation Japan was aiming to be. As such, the Meiji civil code outlawed sodomy in 1872, even though it was repealed soon after in 1880 as the State chose to emulate only certain laws from the West. Nevertheless, contrastingly to its aims, the Meiji Era government also contributed to the emergence of homosexual relationships. For example, by making conscription mandatory, many men who had lived up until now in multi-gender households were to live with other men. The lack of feminine presence fostered homosexual relationships among them (Fairbrother, 2023). Similarly, making education mandatory for all in 1872 led to the development of girls' schools, where same-sex activity began to spread (King, 2020). As an effect, in the 1920s, many Japanese newspapers featured stories of young lesbian couples committing "shinju" – a double suicide, which at the time was considered to be the "ultimate act of love" (Fairbrother, 2023).

Thus, as Taiwan was considered by Japan in 1895, it was also affected by Japan's westernization. However, even before Japanese colonization, Chinese and Western occupations of Taiwan had began to affect the island's tolerance towards same-sex couples. For instance, the Formosan people, the Austronesian Taiwanese, and the Gaoshan people, who inhabited the island from 8,000 up to 15,000 years before the arrival of the first colonizer, the Dutch, had their culture progressively erased (Wong, 2022). Furthermore, as the Dutch East India Company introduced the Roman-Dutch legal system (Cowen et al., 2017), which was followed by the Qing dynasty imposing the Great Qing Legal Code (Wong, 2022), indigenous communities' values and openness to same-sex relationships were replaced by Western and Confucian worldviews, in which marriage was necessarily heterosexual and sodomy was punished. Thus, when Japan colonized Taiwan, such homophobic norms were reinforced, especially as Japan sought to "civilize" the indigenous people, which they did through violence, education, resettlement and restrictive laws. For instance, Japan incorporated the Criminal Act of 1880 with the aim of 'civilizing' Taiwan's indigenous people (Wong, 2022). As Japan had decriminalized sodomy (Fairbrother, 2023) by that time, under Japanese rule, Taiwan did not criminalize same-sex relationships. However, as the Criminal Act defined marriage on the basis of heterosexuality, reproduction and lineage, it suggested the prohibition of same-sex partnerships. This was especially done through the koseki system. Thus, indigenous cultures could only be practiced within the Japanese Empire's conditions, which led many traditions to be lost, erasing the acceptance of same sex relations (Wong, 2022). Nonetheless, the law did not make any explicit mention of homosexuality. While this absence of mention could be interpreted as a form of tolerance, it should not be considered as such as it highlights the way homosexuality was overlooked by Japan and as a consequence, in its colonies. It was indicative of "the silencing of homosexuality". Although Japanese criminal laws were no longer operative in post-colonial Taiwan – thus, after 1945 – its influence remained strong even following its retrocession (Khor, 2010).

5 The Legal and Political Perspective

5.1 Legal and Constitutional foundations

Over the 20th century, both the Japanese and Taiwanese political and legal systems were stigmatizing against same-sex couples. First of all, the absence of laws protecting them made many homosexual individuals afraid to engage in concrete activism due to the risk of worsening their position within society (Lunsing, 1999). Furthermore, homosexual individuals were victims of violence. In Taiwan, they were harassed by the police with unlawful searches and inspections. On top of the police, even medical professionals pathologized same-sex relationships, under the guise of maintaining "virtuous custom" (Shanliang fengsu). This stigmatization was only reinforced with the global HIV/AIDS pandemic (Huang, 2022). In Taiwan's case, the conservatism of the ruling government during the martial law era (1949-1987) further strengthened the widespread hatred against sexual minorities (Kong, 2019). Moreover, their marginalization was reinforced with the emphasis put on heteronormativity by governments. In Japan, the 1947 Constitution concretized the idea of marriage as a heterosexual union through Article 24 which stated that "[m]arriage shall be based only on the mutual consent of both sexes" and mutual cooperation between the "husband" and the "wife" (Constitution of Japan, 1947). Administrative texts also had the same effect, as most of them –many of which are still used today– were based on this "husband" and "wife" binary (Taniguchi, 2024). Although both the Japanese and Taiwanese constitutions guaranteed equality and protection against discrimination, this did not apply to sexual minorities as they made no mention of sexual orientation (Constitution of Japan, 1946; Constitution of the Republic of China, 1946). Hence, it can be said that up to the late 20th century, both countries' legislative stances on same-sex relationships did not differ much. The Japanese rule therefore lasted roughly half a century and influenced Taiwan's post-colonial systems. How come that, in the late 1990s and early 2000s, Taiwan progressively became acceptant of same-sex relationships, ultimately leading it to be the first Asian country to recognize same-sex marriage, while on the other hand, Japan remained attached to its conservative values?

5.2 Diverging paths towards the recognition of same-sex partnerships: Japan's case

Although today, Japan and Taiwan stand at opposite ends in terms of legally recognizing and protecting homosexual individuals and same-sex couples, both of their governments claim to act for such causes.

To begin with, although Japan claims to support same-sex couples, its political and legal actions do not align with its rhetoric. This is because Japanese political parties use inclusiveness as a political tool. According to a national survey conducted in 2020, approximately 10% of the Japanese population identifies as LGBTQ (Lee & Inuma, 2023). Hence, conservative parties have been strategically making pro-LGBTQ speeches to widen their electorate although they do not intend to recognize the rights of sexual minorities. For example, in 2023, the Japanese government led by the ruling Liberal Democratic Party (LDP) wrote that it sought to realize “a society where all people can exercise their abilities and find their lives worth living” by “[addressing] prejudice and discrimination based on sexual orientation and gender identity” (MOFA, 2023). Similar rhetoric is also used at the international level to promote Japan as an ‘LGBTQ-friendly’ country aligned with international norms (Shimizu, 2017; Itakura, 2021). Additionally, although ten out of the eleven Japanese courts judged Japan’s ban on same-sex marriage as unconstitutional, between 2019 and 2025 within the ‘Freedom to Marry for All’ litigation movement, the Japanese government has still not strengthened its protection of homosexual individuals and same-sex couples (Taniguchi, 2024).

However, despite its promising claims and rulings, the initiatives taken by Japan to protect the rights of same-sex couples remain extremely limited. Firstly, these initiatives are limited as most of them are only implemented at the local level. For instance, since 2015, local Japanese governments have introduced “partnership systems” to provide recognition to same-sex couples. As of January 1, 2025, at least 483 municipalities and prefectures covering over 90% of the national population have implemented this system. Although these certifications are not legally binding and only grant benefits related to public services at the municipal and prefectural levels (Boon, 2025), they have provided a form of symbolic recognition for same-sex couples who are not recognized at the state-level (Taniguchi, 2024). At the national level, several initiatives have been taken to promote LGBTQ rights. However, they are far from sufficient as none of them provide any concrete form of protection for sexual minorities. For example, in the 2000s, the government established measures to include content on sexual diversity in school textbooks to protect LGBTQ students from discrimination and bullying. However, even years after this decision, these measures are still not well-implemented (Matuso, 2023).

Moreover, Japan remains stagnant in its recognition of same-sex partnerships due to the political blockage created by the LDP. Indeed, despite the attempts of opposition parties to legalize same-sex marriage and combat discrimination based on sexual orientation, none of them succeeded due to a significant lack of support from the LDP. For example, in 2016, the party rejected a draft bill on the elimination of discrimination on the basis of sexual orientation. In 2019, it rejected one on legalizing same-sex marriage. While in 2021, it rejected another similar to that of 2016 (Taniguchi, 2024). Scholars argue that a considerable reason why the LDP is reluctant to protect homosexual individuals and recognize same-sex union is its desire to affirm its political independence from the West. Indeed, as the Japanese gay rights movement progressively took form with Western influence (Yamamura, 2022; Fujita, 2018), by going against it, the Japanese would be politically and culturally resisting the West (Duncombe, 2022). This legislative blockage is a considerable obstacle to the advancement of LGBTQ rights in Japan as, considering that the LDP has been in power for most of Japan’s post-war history, unless they cede to the oppositions’ demands, their efforts will remain insufficient in changing Japan’s stance on same-sex partnerships (Boon, 2025).

Thus, despite its claims and rulings in favor of LGBTQ rights, Japan is still lagging behind most democratic countries in its recognition of same-sex relationships as its efforts are mainly apparent and do not seek to bring concrete change.

5.3 Diverging paths towards the recognition of same-sex partnerships: Taiwan's case

In contrast to Japan, Taiwan's claims in support of same-sex couples have been increasingly aligned with its political and legal actions. This explains its position as a pioneer state in Asia in terms of LGBTQ rights.

To begin with, Taiwan has provided same-sex couples with the highest form of recognition possible by legalizing same-sex marriage. This was done in 2019 with the Act for Implementation of Judicial Yuan Interpretation No. 748 (Ministry of Justice of the Republic of China, 2019). In 2017, Taiwan's Constitutional Court ruled that the country's ban on same-sex marriage violated Article 7 and Article 22 of the Constitution. Following this decision, the Court gave the Legislative Yuan two years to amend the Civil Code; so that, if it wasn't done by the end of this period, the Court itself would amend the law, showing the independence of the judiciary in Taiwan (Constitutional Court R.O.C., 2017; Petersen & Loper, 2026). This case stands in stark contrast with the many Japanese courts' rulings which did not lead to concrete legal action. While this difference could be explained by the fact that for Taiwan, it was its highest jurisdiction that did the ruling, while for Japan, it was multiple courts that were inferior to the Supreme Court, it showcases the alignment between Taiwan's official statements and legal actions.

Additionally, even before having recognized same-sex marriage, Taiwan had already enacted multiple laws to ensure the protection of same-sex couples, demonstrating its long-term willingness to recognize the rights of sexual minorities. The 2000s witnessed the first concrete attempts to legalize same-sex unions in Taiwan. For instance, in 2001, the Ministry of Justice drafted a Human Rights Basic law that included the right for same-sex couples to form families and adopt (Chung, 2021). Such efforts continued throughout the decade. In 2004, the Taiwanese Parliament passed the Gender Equity Education Act, aimed at cultivating more positive attitudes towards LGBTQ individuals among younger generations by including references to sexual orientation and gender equity in their education (Krumbein, 2022). Additionally, in 2018, Taiwan banned conversion therapy under the Code of Criminal Procedure and the Protection of Children and Youths Welfare Act (Buchan, 2019).

Furthermore, even after the recognition of same-sex marriage, Taiwan continued to make such legal reforms, highlighting its goal of achieving better equality between heterosexual and homosexual couples. To begin with, it did so in January 2023 by expanding same-sex marriage rights to all nationalities. Indeed, when the law was enacted in 2019, its principles did not apply to Taiwanese citizens who were with foreigners from countries where same-sex marriage was not recognized (Chung, 2021). Thus, change was made in 2023 to remove this condition and make civil union possible for all LGBTQ couples (Wu & Liu, 2023). In September 2024, further changes were made to allow same-sex partners from mainland China to register for marriage in Taiwan (AFP, 2024). Moreover, in May 2023, adoption rights for same-sex couples were expanded as the Legislative Yuan amended part of the 2019 Act and granted same-sex couples full joint adoption rights (Taipei Times, 2023). Furthermore, Taiwan is still working to improve this law, as in 2025, the Cabinet advanced draft amendments to open access to Assisted Reproductive Technology (ART) for homosexual couples although the legalization of surrogacy remains a contentious subject debate in the country (Lin, 2025).

Therefore, while both Japanese and Taiwanese governments promote themselves as being supportive of same-sex partnerships; on Japan's side, this support is only apparent as it does not align with its actual legal practices; while on Taiwan's side, it has made concrete legal reforms to increase the protection and recognition of homosexual individuals and same-sex couples.

5.4 Civil society, Advocacy and Legal Reform

One of the primary reasons why Japan and Taiwan hold such contrasting stances on homosexuality, despite their historical similarities, is due to the impact of their civil societies on legislation.

On the one hand, while Japanese civil society is an important actor in the fight for the recognition of homosexual couples, the embeddedness of the conservative ruling party in Japan weakens the civil society's influence on legislation (Barker, 2021). In Japan, LGBTQ activism began to contribute to political and legal change in the early 1990s as activist and advocacy groups such as OCCUR began to stand for gay rights, both through protests and participation in court cases (Boon, 2025). Since then, many groups have attempted to introduce laws to protect and promote the rights of homosexual individuals and same-sex couples. For example, since 2015, the group Japan Alliance for LGBT Legislation (J-ALL) has been writing proposals for the state to ban discrimination based on sexual orientation in administrative contexts (Boon, 2025). However, despite such attempts, Japanese civil society still has a weak impact on legislative procedures because of the LDP's influence. Yet, despite the state's conservatism, the lack of backlash from the civil society to major pro-LGBTQ instances showcases its growing acceptance of homosexuality. Thus, while the majority of the civil society does not actively support the movement, its passiveness lets predict that it is not likely to obstruct the advancement of LGBTQ rights in the future (Barker, 2021).

On the other hand, the Taiwanese civil society is a driving force in the country's legislation regarding homosexual individuals and same-sex couples. LGBTQ activism rapidly rose in Taiwan in the late 20th century, first with the mediatization of activist Chi Chia-wei's fight for the legalization of same-sex union (Haas, 2017; Ho, 2018), then with the Taiwan Tongzhi Hotline Association which began to file petitions to legalize same-sex marriage. As an effect, in 2000, the Democratic Progressive Party (DPP), a political party which supports the elimination of discrimination on the basis of sexual orientation, came to power. This instance represented a significant leap forward for the LGBTQ community in Taiwan, especially at a time where the protection of gay rights was not a global political or legal norm. Thus, it is a considerable evidence of the influence of the Taiwanese civil society in national politics. As an effect, the following decade saw the creation of many more activist and advocacy groups supporting the recognition of same-sex unions. For example, in 2009, the Taiwan Alliance to Promote Civil Partnership Rights (TAPCPR) was formed and began to draft bills that eventually pushed marriage equality as a mainstream legal issue (Kuo & Chen, 2017). On top of pro-LGBTQ movements and organizations, the Taiwanese gay rights movement was progressively strengthened by other, non-LGBTQ national movements and organizations which advocated for greater human rights. For example, this is the case of the 1990s women's movement which, by advocating for gender equality and the erasure of patriarchy, laid the foundation for gender-neutral partnership. Legally, this movement contributed to reforming the Civil Code's definition of marriage as a joint partnership between two persons rather than a union between a man and a woman in which the husband enjoys more rights than the wife (Lee, 2003; Lee, 2007; Li, 2007). Additionally, a non-negotiable factor which explains the growing influence of the Taiwanese gay rights movement is Taiwan's – which includes both its civil society and its government – wish to go against Chinese domination by recognizing the rights of minorities. Thus, the creation of parties such as the New Power Party (NPP) or the Social Democratic Party (SDP) which push a democratic agenda that includes the protection of sexual minorities, not only serves the purpose of the state but also that of the concerned minorities (Ho, 2018). Moreover, by being receptive to the population's demands in regards to LGBTQ rights, the sphere for political opportunities (Skocpol, 1979) is overall much larger in Taiwan compared to Japan. That is why the Taiwanese gay rights movement, or Taiwanese democratic movements as a whole, lead to much greater changes compared to the Japanese movements.

Therefore, Taiwan is much more advanced in terms of the recognition of the rights of homosexual individuals compared to Japan because of its government's willingness to adapt to its civil society's advocacy.

6 The Social and Cultural Perspective

The divergence between Taiwan and Japan can be explained by the differences in institutional rigidity surrounding the family structure. The Japanese state's resistance to marriage equality is linked to the *koseki* or the household registration system, which in turn organises what the family is. White (2018) argues:

> *"The surname is central to the patrilineal and patriarchal koseki structure, which in turn is central to the ideology or understandings of the family." (p. 33)*

The *koseki* requires everyone in the same family unit to adopt the same surname and enforces patriarchy that is based on heterosexual marriage (Chung, 2021). Same-sex couples cannot integrate into the *koseki* without challenging its heteronormativity, Japanese queer couples have resorted to the legal loophole of adult adoption, where an older partner adopts the younger one, to be recognised as a family (Tamagawa, 2016). These solutions however misrepresent their relationship.

Taiwan also shares a Confucian society that emphasises patrilineal succession and filial piety, yet it successfully navigated these constraints in the process of legalising same-sex marriage in 2019. This was made possible because institutional understandings of what constitutes a family had undergone transformation in the 1990s (Tang et al., 2020). Using this landscape, Taiwanese LGBT+ activist groups focused on family building as a rhetoric to push for marriage equality. There are critiques of reproducing heteronormativity in the special law that legalised same-sex marriage. Chen (2019) argues that this legislation is heavily rooted in "mimicking" heterosexual norms. The author argues that this system affirms marriage normativity by confirming the unequal and oppressive aspects of the marriage institution.

We cannot fully understand the divergent paths without looking at the different nature of anti-LGBTQ+ sentiments in both nations. Japan has historically lacked a large religious authority that singles out homosexuality as a definitive sin. This is unlike Western contexts where homosexuality was historically subjected to religious persecution. Consequently, the nature of homophobia in contemporary Japan is quite particular. There exists no real anti-homosexuality laws and surveillance of sexual minorities is largely absent (Tamagawa, 2016). Japanese society exhibits what scholars call "quiet homophobia" in the public sphere, added onto "familial homophobia" in the private sphere (Tamagawa, 2016). In the public sphere, sexual minorities are frequently consumed as media entertainment, projecting a "gay friendliness." In the private sphere that is governed by heteronormative patriarchy, homosexuality is policed and suppressed to maintain familial honour and social order. Consequently, a society is created where LGBTQ+ individuals are tolerated as long as they conform to the heteronormative status quo. Japanese lesbian writer Hiroko Kakefuda writes that minorities in Japan were "allowed into society but society would act as if they weren't there, by ignoring them, and if that didn't work, telling them to keep quiet" (Tamagawa, 2016, p. 169). Lesbians specifically were valued only as pornographic content. The attitude towards homosexuality has been largely an avoidance to acknowledge or discuss it. Therefore, because discrimination is largely hidden, it is harsher.

Conversely, Taiwanese society's anti-LGBTQ+ sentiments have shifted to a confrontational and organised movement. As the Taiwanese LGBTQ+ movement gained immense visibility and traction in the 2010s, a religion-based conservative countermovement took form. Despite Christians comprising a minority of the Taiwanese population, highly organised and well-funded Christian groups organised a massive backlash against the movement for marriage equality. These factions banded together under the banner of protecting "family values" by forming coalitions such as the Coalition for the Happiness of Our Next Generation (CHNG) and the Family Guardian Coalition (FGC). This hostility escalated into a culture war that culminated in the 2018 referendums to reject or accept amending the Civil Code.

This difference in the nature of anti-LGBTQ+ sentiment has profound consequences for the capacity of each movement to mobilise. In Taiwan, the visibility and confrontational character of conservative opposition has also helped the pro-equality movement. When the enemy is tangible, the response can be organised better. Japan's "quiet homophobia," by contrast, lacks a proper target that can be fought by legislation. In this case, there is no singular antagonist against which a mass movement can rally.

The trajectory of marriage equality is also undeniably linked to the use of nationalism. In Taiwan, the advancement of rights for sexual minorities cannot be separated from the nation's geopolitical positioning. Taiwan has pushed an effort to cultivate legitimacy on the global stage. Consequently, Taiwan's embrace of LGBTQ+ rights is driven by a need to make a distinct non-Chinese national identity (Geronimo, 2021, p. 12). Taiwan has also adopted the title of "Asia's First" to legalise same-sex marriage, thereby projecting itself as a beacon of progressiveness in contrast with the People's Republic of China (PRC). Krumbein (2022) argues:

> *"But the topic had the advantage of fitting well into the narrative of Taiwan as a successful democracy and a human rights-abiding country, a narrative that distinguished Taiwan from mainland China (Krumbein, 2020)." (p. 65)*

Josephine Ho, regarded as the "godmother of the Taiwanese queer movement," notes, "[t]he China issue is closely related to [the] gay issue and [the] gay movement in Taiwan because it can serve a very important function in promoting Taiwan's image as a democratic" (Geronimo, 2021). The discourse surrounding same-sex marriage within Taiwanese LGBTQ+ community is also about viewing "a local Taiwanese identity versus a broader and ethnically inflected Chinese identity" (Wei, 2023).

Here, we use the concept of "homonationalism" as developed by scholar Jasbir Puar in her 2007 book "Terrorist Assemblages: Homonationalism in Queer Times." Puar (2007) argues that liberal states selectively use queer communities, typically without disturbing the cisheteronormative order, to project an image of progress, as opposed to what they deem as non-civilised states. She writes:

> *"The politics of recognition and incorporation entail that certain–but certainly not most–homosexual, gay, and queer bodies may be the temporary recipients of the "measures of benevolence" that are afforded by liberal discourses of multicultural tolerance and diversity." (p. xx)*

While Puar is writing specifically about the United States, it can be extended to view Taiwan's usage of marriage equality. This narrative relies heavily on a dichotomy where the PRC functions as an "evil other," thereby associating queer liberation into a broader project of Taiwanese sovereignty and independence. This mechanism also demands a specific form of respectability, excluding "dangerous" queer people as HIV carriers, sex workers, and people who engage in BDSM (Kong, 2019). The Taiwanese queer subject is validated so long as their assimilation into marriage helps the state's sovereignty narrative.

Nationalism manifests in Japan with a different logic. Some view legalisation of same-sex marriage as a further westernisation of Japanese society (Tamagawa, 2016). Right-wing and conservative factions frame LGBTQ+ rights as opposed to the nation's cultural fabric. This protectionism is deeply embedded in the country's demographic crisis. Conservative groups and politicians use the declining birth rate to delegitimise minorities. LDP politician Mio Sugita has asserted that LGBTQ+ individuals "do not produce anything" (Yagi, 2024). Japanese nationalism constructs the queer subject as an unproductive burden for the state.

Ultimately, these contrasting ways nationalism manifests provides one explanation for the divergent legislative outcomes regarding marriage equality in these two nations. Taiwan achieved marriage equality because its nationalism required the integration of LGBTQ+ people to legitimise the state on the global front. Japan remains stuck on the question of marriage equality because the way nationalism presents itself here is predicated on excluding the LGBTQ+ community.

7 Conclusion

In conclusion, although Japan and Taiwan had similar historical and cultural stances on homosexuality and from a current standpoint, are comparable in terms of democratization and economic development, Taiwan recognizes LGBTQ rights while Japan does not.

Both Japan and Taiwan initially possessed indigenous or traditional cultures that embraced same-sex relationships. However, their shifts toward heteronormativity occurred differently: Japan voluntarily adopted Western legal and social binaries to modernize, whereas Taiwan was forced to adapt to them through Western, Chinese and mostly Japanese colonial rule. Indeed, during the imperial era in the 20th century, Japan acted as a colonial force that, influenced by Western values, imposed strict heteronormative family structures on Taiwan. However, its social landscape was not as profoundly impacted as one would think, as its enforcement of heteresexual marriage is differing consequently from Japan.

From a legal and political standpoint, the divergence happened because on the one hand, the Taiwanese judiciary's independence has allowed it to establish concrete measures aligned with the Constitution without being affected by the political parties' changing opinions; while on the other hand, Taiwan's civil society has had greater political opportunities to make its claims known and the government has been actively considering and acting upon its demands. However, in Japan, despite having an active judiciary which recognized the unconstitutionality of the ban on same-sex marriage as well as an active civil society, the conservative ruling party's embeddedness in the country makes it difficult for it to emerge as a key actor in bringing concrete political and legal changes.

Lastly, from a social and cultural standpoint, the divergence between Japan and Taiwan can be explained through various factors. Japan's family system, focused on the koseki, disables legal recognition, while Taiwan's evolution in understandings of the family enabled reform. Japan's "quiet" homophobia limits mobilisation, whereas Taiwan's visible and organised opposition helped mobilise pro-equality movements. Additionally, nationalism operates differently in each case, with Taiwan incorporating LGBTQ+ rights legitimacy purposes in a form of homonationalism, while Japan's definitions of nationalism tend to exclude them.

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ASAHI SHIMBUN'S PORTRAYAL OF FOREIGN WORKERS

During the 2025 and 2026 Elections Campaign In Japan

Asia Pacific Research Circle

Sciences Po

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Abstract

As Japan's foreign worker population tripled to 2.5 million between 2015 and 2025, immigration emerged as a flashpoint in electoral politics, with conservative parties such as Sanseitō framing foreign workers as threats to wages, security, and national identity. This paper examines how Asahi Shimbun – Japan's second-largest newspaper, known for its progressive editorial stance – constructed the issue of foreign workers during the 2025 House of Councillors and 2026 House of Representatives election campaigns.

Drawing on qualitative content analysis and critical discourse analysis of 84 articles, and using framing theory as its analytical framework, the study finds that Asahi Shimbun consistently countered exclusionary rhetoric through inclusive framing, humanisation of foreign workers, and systematic fact-checking in 2025, while shifting in 2026 toward more nuanced acknowledgement of integration challenges. These findings suggest that the newspaper functions not merely as an information transmitter but as a moral-political agent shaping public discourse toward multiculturalism in the face of rising ethno-nationalist sentiment.

Keywords: Foreign workers, Immigration, Media representation, Asahi Shimbun

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1 Introduction

On August 30th, 2025, amid a sharp rise in foreign workers, reaching 2.5 million and accounting for 1 in 27 jobs, anti-immigration rallies in Japan, Osaka, drew over 3,000 protesters chanting 'End mass immigration'. These protests notably illustrate how immigration, despite its economic necessity, can be framed as a national crisis through the media. This process is also illustrated by the 2016 Brexit referendum, where emphasis on immigration and economic threats contributed to swinging public opinion in favor of leaving.

In recent years, as the number of foreign workers in Japan tripled from 900, 000 in 2015 to 2.5 million in 2025, the issue of foreign workers has become increasingly visible in Japanese electoral campaigns, policy debates and discourses (Takahara & Speed, 2026). There is a growing presence of non-Japanese nationals working across various sectors of the Japanese labor market. This led to discussion extending beyond employment to encompass questions of belonging, citizenship, and social cohesion. In this paper, "foreign workers" is defined as non-Japanese nationals holding work-related visas, while "foreigners" refers to a broader category of population without Japanese nationality. In this paper, the issue of foreign workers is treated as a politically constructed problem, shaped by electoral discourse in the media.

Japan is facing a serious demographic challenge. While the population shrinks, the workforce becomes increasingly older and smaller. In various industries, foreign workers play pivotal, necessary roles in maintaining daily operations. However, public debate linking foreigners to crime, welfare use, land ownership, or economic pressure persists in daily media coverage. In addition, discussions over the integration of foreigners and their recognition as members of Japanese society have existed for many years. These debates are particularly amplified during election periods, gaining visibility through the media, which often attributes political meaning to the discussion of foreign workers. The two most recent national elections – the 2026 Lower House election and the July 2025 House of Councillors election – were no exception. The topics of "foreigners" and "foreign workers" were frequently raised in campaign speeches and party platforms, as conservative and radical parties used slogans such as "Japan First" and "Zero Illegal Foreigners." In this rhetoric, foreign workers were associated with low wages, social insecurity, and economic decline. In this context, foreign workers were no longer discussed as labor contributors but as symbolic figures in political competition.

In this situation, the media plays a significant role, by not only transmitting the political statements of the political parties' statements but also their own. Indeed, newspapers subtly convey signs of their political orientations through selection of topics, the organization of articles, the choice of interviewees, and presentation of facts. The way an issue is framed can influence how readers understand it. As framing theory posits, the media can make certain aspects of perceived reality more salient than others, to promote a certain problem definition, interpretation, evaluation, and recommendation of action (Entman, 1993). During elections, when political claims are strong and sometimes emotional, journalistic choices may shape how voters evaluate different arguments. This leads to the main question of this study: how does Asahi Shimbun construct the issue of foreign workers during election campaigns in Japan? How are the newspaper's political stances represented through reproducing, balancing, or challenging this framing?

This paper argues that Asahi Shimbun tends to adopt a rather inclusive stance on immigration through article structure, humanization of immigrants, and amplification of inclusive perspectives. At the same time, its 2026 coverage increasingly acknowledged the integration challenges and emphasized the importance of fact-checking to encourage objective assessment. While this focus may contribute to counterbalancing rising extremist rhetoric, suggesting a moderating role in public discourse, it can also be interpreted as a reflection of the newspaper's own ideological bias.

In order to assess the question, this study examines articles published by Asahi Shimbun during the official campaign periods of two recent national elections: the 2025 House of Councillors election and the 2026 House of Representatives election. Asahi Shimbun was used as a primary source because of its nationwide reach and comprehensive archive. With daily prints exceeding three million copies, it is one of Japan's most widely read newspapers and holds a large influence over public discourse (Asahi Shimbun Business Hub, 2025). By comparing two election periods, the study considers any eventual shift in the way this topic is discussed, with a particular focus on the change in attention given to foreign workers and to the reporting style. The analysis then focuses on three aspects: issue selection, voice selection, and fact verification. Through this examination, the paper aims to understand how Asahi Shimbun presents the issue of foreign workers during election periods, and how its reporting participates in shaping public discussion.

2 Literature Review / Theoretical Framework

2.1 Media and Public opinion

During the 1920s, the widespread theory of the 'Magic Bullet' posited that the media was assumed to have direct, powerful influence on audiences. Yet, from the 1940s, the 'Limited Effect' theory developed by Lazarsfeld challenges the latter. In effect, he discovered the importance of interpersonal communication in shaping public opinion, more than direct media exposure which only reinforces pre-existing attitudes rather than converting them. This theory introduced the two-step flow model, whereby media messages flow first to politically engaged opinion leaders before reaching the general public through personal influence. Subsequent research built on this foundation: McCombs and Shaw's 'Agenda-setting' theory showed media determines issues citizens prioritize; for instance, increasing media portrayal of immigration issues raises its salience in public opinion. While they focused on the topic, Iyengar and Kinder's 'Priming' emphasizes the narrative around a given topic, activating specific criteria for evaluating leaders. If news highlights security, voters judge presidents on security. If the economy dominates, economic performance matters most. TV experiments confirmed this across contexts.

2.2 Japanese Public Opinion towards Immigration

Widespread opposition to immigration has generally been a feature of Japanese public opinion, especially when it comes to identity-based worries. This opposition is complex because there is noticeable support for immigration in certain industries, like care workers, where identity-based resistance is subordinated to material-based concerns, such as labor shortages–a phenomenon known as "pragmatic divergence" (Davison & Peng, 2021).

Despite enduring public resistance, the political leadership, especially the former Prime Minister Abe Shinzō, played a crucial role in changing immigration policy. Abe's administration implemented the 2018 reform to increase job opportunities for unskilled foreign workers, despite historically enforcing restrictive immigration laws. In addition to the fact that Abe's political leadership overcame earlier institutional fragmentation and disparate policy frames that had impeded reform, the policy change also resulted from demographic challenges and business demands (Chiavacci, 2025; Song, 2020).

Social factors significantly affect Japanese public opinion towards immigration. Communicating in English is associated with more favorable views of immigrants, indicating that even brief interactions can lessen unfavorable impressions (Green & Kadoya, 2015). However, the Japanese government has demonstrated reluctance to open the nation widely to immigrants despite demographic pressures such as rapid aging and population decline, in part because of challenges in reaching political consensus and a wish to avoid politicizing immigration (Gigante & Gest, 2025). Public opinion, which is cautious or opposed except in specific circumstances, reflects this reluctance. In effect, the 2025 Asahi Shimbun survey showcases a 66% favor of current Prime Minister Takaichi's conservative policies. More than half of the Japanese surveyed (56%) wish for fewer immigrants. Furthermore, the 2025 anti-immigration rallies in major cities such as Tokyo or Osaka holding "End mass immigration" banner, again demonstrate Japanese's reluctance to welcome further foreigners.

2.3 Japanese Media Portrayal of Immigration

In modern communication studies, the connection between journalistic language and public cognition has been well-established. Systematic linguistic patterns are directly correlated with the reinforcement of readers' implicit attitudes toward immigration issues (Lynott et al., 2019). Pro-immigration discourse employs humanizing frameworks, whereas anti-immigration rhetoric often employs exclusionary lexical choices (Buckley-Zistel et al., 2016). This implies that Takaichi's upholding of the order narrative that permeates contemporary Japanese policy is either supported or challenged by the Asahi Shimbun's linguistic choices, which go beyond simple stylistic choices.

The audience's prior knowledge moderates the impact of media framing, which is not a monolithic effect. Following Schemer (2012), the knowledge gap in immigration discourse plays a critical role in the processing of news. Media portrayals exert significant influence on individuals with low-to-moderate issue-specific knowledge (Burke, 2014), for whom negative frames can catalyze stereotypic attitudes; conversely, positive framing has been shown to mitigate prejudice within these same groups (Atia et al., 2025). In the context of the 2025 election in Japan, Asahi Shimbun's potential role as a corrective force against the extremist rhetoric of parties, such as Sanseito, can be particularly important for undecided or less-informed segments of the Japanese electorate.

Empirical research by Kaneko, Asano, and Miwa (2021) uses ideal point estimation to validate clear ideological slants within editorial texts, despite the fact that Japanese media frequently maintains a façade of political neutrality. "Selective exposure," in which readers favor publications that reflect their own ideological inclinations, exacerbates this polarization. Asahi Shimbun, a historically left-leaning organization, works in a media environment where nationalist sentiment, such as the Takaichi government's move toward the "order", and economic necessity are "at odds". As a result, the debate over Japanese national identity primarily takes place in the newspaper's discourse.

In sum, Asahi Shimbun actively creates a moral and political framework for immigration. This study will deconstruct how the 2025 election coverage functions as a pivotal point for Japan's self-concept as either a closed society or an emerging multicultural state by combining linguistic bias studies with cognitive effect theories and the unique ideological landscape of Japan.

3 Methodology

This study employed a qualitative text analysis on the articles written on foreign workers in Asahi Shimbun during the two most recent elections in Japan - the 2025 House of Councillors election and 2026 House of Representatives election. The focus does not rely on quantitative analysis of statistical data, but on qualitative methods of understanding how the reported content presented the issue, focusing on narrative structure, voice distribution, word choices, and placement of inclusive and exclusive views. The analytical framework of this study relates to the framing theory (Entman) and critical discourse analysis (van Dijk; Fairclough) amongst others, which provide the theoretical basis for examining interpretative structures and ideological language use.

Firstly, the paper applied the Qualitative Content Analysis theory (Marying, 2000). Marying outlines ten steps grouped into three phases: in the "preparation phase" data were carefully selected and organized. After multiple readings, units of analysis were defined, enabling the creation of coding rules. Second, the implementation phase consists of coding and category building, by tracking patterns and testing codes on articles for reliability. Indeed, after the choice of focusing on the elections period of 2025 and 2026, the analysis proceeded at sentence-level for linguistic features and paragraph-level for thematic framing, balancing granularity with holistic meaning. From this, code categories such as inclusivity framing, humanization or fact-checking emerged. For instance, fact-checking required expert' analysis of official information and its use to correct controversial claims linking foreigners to the increase of criminal rate and welfare burden. The final phase of reporting was also applied as this paper systematically links empirical findings to the central research question posited. In effect, each section, "Pro-Inclusion Narratives", "Humanization" ties back to Asahi's "inclusive" stance.

Additionally, Marying posits the inductive and deductive approaches in qualitative content analysis. The former refers to reading articles without preconceived notions and the latter enables an analysis of articles with predefined frameworks, testing if data fits them. Thus, the study is inductive as it identified key themes such as foreign workers' "indispensable presence" or "pro-inclusion narratives". It is also deductive in the sense that theories were applied in order to proceed to the examination of articles. Thus, theoretical structuring generated themes from the articles that the deductive approach enabled to organize them according to theories.

Second, the study examined how Asahi Shimbun structures narratives around foreign workers by focusing on which perspectives are emphasized. This is based on Entman's framing theory, where he defines framing as selecting "aspects of perceived reality and making them more salient in a communicating text" (Entman, 1993, p. 52). Although not all frames include all characteristics, frames are characterized by defining problems, diagnosing causes, making moral evaluations, and suggesting remedies. As a consequence, they influence how people evaluate and choose to act upon what they see. Applied to the study of Asahi Shimbun, this paper examined which aspects of issues revolving around foreign workers were highlighted and how they explain the causes. More precisely, each article was analyzed for problem framing, causal interpretation of who is held responsible in discourses, moral evaluation through the study of evaluative adjectives and normative statements, and finally, treatment recommendation referring to implied and explicit solutions proposed.

Finally, this study analysed Asahi Shimbun through the Critical Discourse Analysis (CDA) tools (van Dijk, 1998, p.250-254), (Fairclough, 1995), which emphasizes how lexical choices and voice distribution reveal ideological positioning. The core CDA tools of lexical analysis enabled the study of word choice of evaluative adjectives such as "dangerous", "illegal", "coexistence", or "economic contribution", (Asahi Shimbun, 2025). Furthermore, quotation patterns evaluated the speaker and its frequency. The newspaper's article structure, another CDA tool, studied macro-sequencing and framing devices. Moreover, transitivity allowed us to identify agency in the clauses. Finally, the paper studied presupposition and assumptions in the articles.

Together, these frameworks provide a way to interpret both the content and form used by Asahi Shimbun to construct a narrative. This paper will systematically examine the issue selection, voice selection, and fact verification to see how the Asahi Shimbun presents the issue of foreign workers during election periods, perhaps signaling their political perspective. Overall, the study situates the media representation of foreign workers within the broader perspective of the social construction of reality, understanding the "foreigner issue" as a socially constructed phenomenon shaped through journalistic discourse.

The articles were collected from the Asahi Shimbun digital website which publishes all articles available for subscribed readers. Using the filter search function, articles including the term "外国人労働者 (foreign workers)" during the official campaign periods, defined as the period between the official announcement of the election and voting day: July 3rd to July 20th in 2025 and January 27th to February 8th in 2026. This led to 30 articles from the 2025 House of Councillors election and 54 articles from the 2026 House of Representatives election. Articles which feature foreign workers only partially, such as for a minor reference within a broader policy discussion, were excluded from analysis. The remaining articles, in which foreign workers were a central subject, were studied. The examples mentioned in the following analysis section are the articles which illustrated patterns well, rather than an exhaustive account of every article.

Nonetheless, the method presents limitations. The main limit lies in the inherently subjective nature of qualitative analysis. Despite attempts to mitigate this through re-reading, the analysis is still influenced by our own interpretative framework and ethical opinions. The decision to exclude articles which foreign workers only appeared as a peripheral subject creates another limitation. As the boundaries between central and peripheral focus are not clear-cut, this may skew findings. Furthermore, this paper solely focuses on the Asahi Shimbun; thus, cross-comparing with other newspapers on a diverging political spectrum (Akahata Shimbun, Yomiuri Shimbun) might broaden this study's scope and strengthen the representativeness of the findings.

4 Analysis and Findings

4.1 2025 electoral campaigns

4.1.1 Amplifying pro-Inclusion Narratives for Foreign Workers

This section examines how Asahi Shimbun promotes inclusivity of foreign workers. An article by Ishida (2025) elaborated on the contribution of foreign workers. The interviewee Takahiro Inoue, the sub-leader of Osaka Restaurant Industry Association, explained the difficulty of gaining sufficient workers for his restaurants due to its relatively low salary and work on holidays. He emphasized that foreign employers are essential for the industry and highlighted their unique contributions, such as introducing efficient methods from their own culture to reduce operating costs.

There were other ways to advocate inclusivity of immigrants. One article, while hesitant to criticise the negative opinions held against foreigners, led the readers to question the inclusivity of Japan by referencing electoral participation and questioning the boundaries of citizenship; specifically, who is recognized as a "citizen" and whose voice is legitimized or excluded. This question was raised at the end of the article about stereotypes, prejudice, and the cleavage between citizens and foreigners, thus conveying the message for a more inclusive view on foreigners. Moreover, another article titled "Governors' concerns on exclusionist sentiment" was solely dedicated to describing two governors - Yoshihiro Murai and Yuji Kuroiwa - expressing their concern over anti-foreigner rhetoric. Murai said that "Japan should not reject foreigners" and that he "supports acceptance of foreign labourers" and proactively seeks coexistence with them. Moreover, Kuroiwa stated that he "felt very strange about the exclusionist movements" because "creating a society where we could live with foreigners is the most basic." Complementing advocacy, Asahi Shimbun combats misinformation through fact-checking (Oyama & Yamamoto, 2025). They also criticised the exclusionary policies. Indeed, the radical parties instrumentalized foreigners, especially workers, as convenient scapegoats for current social and economic struggles. Mentions of the far-right party Sanseitō were always associated with the "Japanese First" narrative and their blame on foreign workers for low wages, stealing Japanese job opportunities and broader economic decline. "Zero Illegal Foreigners" and "economic invasion" of the foreign laborers are common rhetoric the party uses in their campaign trail. Asahi Shimbun warns of this rhetoric as being a "Pandora's Box" of prejudice (Asahi Shimbun, 2025), adding their moral evaluation .

Asahi Shimbun often structured their articles to conclude with inclusive perspectives, even if they covered both pro- and anti-immigrants' viewpoints. For example, in the Hokkaido election district article (Asahi Shimbun, 2025), the beginning of the article highlights Sanseitō and Conservative Party's rejection of foreign immigrants, accusing them of increasing the price of food, of buying Japanese land, of coming for a short period of time and committing crimes and leaving right after. They therefore strongly advocate for stricter measures against crimes and selling land to them. However, the article concludes with perspectives from The Communist Party's or Reiwa Shinsengumi's, which temper and nuance extremists' claims. Moreover, claims that Japan must welcome foreign students, notably the most brilliant ones. According to Tamura from the Communist Party, the main problem resides in LDP's politics of making educational matters private. Likewise, the Constitutional Democratic Party representative wishes for a multicultural society in which foreigners who willingly learn about Japanese culture are praised. By concluding with a positive stance on foreigners, the reader gets a stronger impact from these inclusive perspectives, effectively contrasting with the exclusionary rhetoric of radical parties while suggesting Asahi Shimbun's aim. The same structure was seen in other articles. In an article focusing on the different political parties' stance on foreign policy, the articles first presented LDP and the Democratic Party of the People's stance of strengthening laws to ensure the protection of Japanese citizens' interest, under the slogan of "zero illegal foreigners" or restricting real estate investment in areas that are important for national security. This was followed by Sanseitō's "Japanese first" stance and was finished by the concerns of these policies leading to exclusionism or prejudice, with the example of the Communist Party pursuing the protection of rights for foreigners equal to Japanese citizens. Building on these patterns, Asahi Shimbun pushes for inclusivity.

The authors of foreign labor related articles are also worth consideration. There were authors who had explicitly embraced foreign labour. Chika Yamamoto, for instance, is a writer for Asahi Shimbun and has an emotional attachment to foreigners because she has foreign relatives (Yamamoto, 2025). This led her to specialize her writings in this topic and she explicitly expressed in her biography for the newspaper that she has a "strong interest in the education and support of children with roots overseas." Takuya Asakura also wrote articles regarding foreign laborers. He stated in his biography that his passion for journalism originates from his willingness to voice vulnerable people's opinions (Asakura, 2025). Thus, his stance on immigrants is clear-cut: in several interviews, he counters common opinion on foreign laborers such as that illegal overstays improved compared to the 1990s, or that foreign crime rates are comparable to Japanese's, while criticizing radical parties' aim for 'zero illegal overstays' saying it is realistically impossible.

4.1.2 Correcting misinformation through Fact Checking

Asahi Shimbun actively counters contested xenophobic information regarding immigrants by promoting fact-checking. An article notably invites Naoko Hashimoto, a professor of International Christian University to critically debunk misinformation (Asahi Shimbun, 2025). According to her, despite an increase in foreign population, the number of arrested foreigners has remained unchanged for the past decade. She also highlights that foreign-national households account only for 2.8% of the 1.63 million welfare recipient households. These data challenges the political parties' claims about foreigners abusing welfare and undermining safety. Hashimoto asserts that the xenophobic misinformation is intended for electoral advantages to appeal to the increasingly anxious population experiencing harsher living conditions due to rising prices and yen depreciation. She concludes by positing that governments must integrate foreigners in the society through education and the participation in 'social integration courses,'. Similarly, in the article "Did the exclusionary trend in Japan spread?," professor Shunsuke Tanabe from Waseda University, claims that there is no exclusionary trend toward foreigners across Japan overall, based on a survey. In this interview, focus must also be on Asahi's asked questions: "Regarding welfare benefits of (...) foreign households account for less than 3% of recipient households in 2023, yet discourse claiming that foreigners are 'abusing' it has spread widely, what do you think about it?" or "Why do so many people believe misinformation?" implicitly guides readers toward constructing evidence-based views on foreign workers. Questions such as "Are immigrants a burden on the society" also leads the answer toward a positive economic framing, emphasizing their net contributions. In fact, in its July 13 editorial on "foreign policy and the Upper House election," the newspaper encouraged the readers and politicians to "not be swept away by xenophobia", marking a shift from a neutral report to normative intervention. Additionally, they qualify anti-foreigner catchphrases as "intense phrases inciting anti-foreigner sentiment" and frame them as dangerous not only for the foreigners but also for the democratic debates. These articles suggest the newspaper's commitment to fact verification and the subsequent defense for immigrants in Japan. Furthermore, by ending on inclusive notions, the article leaves the readers with a normative cue.

4.1.3 Humanization of Foreigners to Avoid Generalizations

Asahi Shimbun also emphasizes the individuality of foreign workers, countering stereotypes and generalized negative notions.

First, Asahi Shimbun questioned the generalization of foreigners. Foreign workers are often linked with negative socio-economic issues such as crime, land ownership, inflation and welfare as an overgeneralized group of "foreigners" and "foreign workers". In effect, the article titled " Japan treats 1 million foreign workers as 'non-existent'" specifically states: “The central government has consistently treated immigrant workers as 'they are present but non-existent,' but the measure has already met with strong opposition from local governments and businesses”. During this crucial election-season, these claims may influence the voters’ perception. Besides, oftentimes, these false narratives primarily serve as tools to mobilize votes, and are not based on empirical study. Another article questioned the prevailing claim of the “threat from foreigners," stating that perhaps such fear comes from the overgeneralization of the diverse foreign population (Park, 2025).

The example of humanization of foreign workers is evident in the article of an Indonesian worker. Although most of the articles of the Asahi Shimbun discussed foreign workers as a faceless group, there were articles that gave voice to individuals. An article titled “Relying on brokers, ending up in Ariake”, depicted the story of an Indonesian worker who was illegally working in Japan with a residence permit that prohibited him from working. The article gave room to his side of the story, based on the interview they had with him. It showed that the man was from a poor family, and that he obtained the residence permit following the instructions of a broker who he paid to get a job in Japan. When he was told by the prefecture that he was not allowed to work, he contacted the broker, but was told that he was allowed to work. When asked about why he continued to work despite not being supposed to in the first place, he answered that he “had to,” especially with his remaining debt. By giving him a voice and presenting his vulnerable situation, Asahi Shimbun humanizes the individual and gives the readers more space to empathize with the worker. Although illegal labour is a disadvantageous topic for immigrants, this nuances the topic.

4.2 Comparison with 2026 electoral campaigns

The articles on foreign workers during the 2026 elections period showed continued approach from 2025, where Asahi Shimbun highlighted the economic contribution to promote inclusivity. However, it showcased a more nuanced approach by putting more emphasis on acknowledging the challenges of integration.

4.2.1 Continued advocacy for inclusion

Overall, articles continued to advocate inclusive perspectives on foreign workers by highlighting their economic contribution and emphasizing the necessity of their labour due to Japan’s labour shortage. The working population reached 70 million people in 2025, the highest in record yet, despite the declining working age population, due to the increase in working elderly, women, and foreigners (Asahi Shinbun, 2026). In an article, the guest speaker, JCCI Chairman Kobayashi, states that one in every small and medium sized enterprises employs foreigners, highlighting Japanese society’s need for foreigners labor participation and thus champions a society that welcomes them (Asahi Shimbun, 2026). Another article addresses foreign workers’ living conditions in Japan in the context of elections (Asahi Shimbun, 2026). At Yamamoto Kōki, a casting processing company in Saitama prefecture, nine out of seventeen employees are Vietnamese workers on technical intern training or Specified Skilled Worker visas. Emphasizing on harsh conditions, the 40 degrees celsius in summer, inside the factory, the article underlined the fundamental contribution in the Japanese economy by giving the example of: "Like this company, foreigners are supporting the front lines in many industries that underpin Japan's foundation." In Japan, 1 out of 27 workers is a foreigner, and over 370 000 enterprises employ them. This number increases in the manufacturing sector where the foreigners' ratio is 1:16, and in accommodation and food services, where it is 1:13 ratio. Supported by statistical data, the article highlights their contribution, and finally, ends with a supportive description of foreign labor as "deeply integrated into this society as an indispensable presence for the Japanese economy" (Asahi Shimbun, 2026).

Moreover, some articles depicted them as active contributors with a leading role in economics. The article "(Multicultural Society) 3.96 Million People, Neighbors Who Blend In: A Former Trainee Leads the Factory – 'If They Were Gone, It Would Collapse'" started with the increasing negative perception of foreigners by the Japanese citizens, but counters this view. The article depicted Vietnamese workers who became indispensable as they gained their skills and started teaching the others, and an American worker who learned Japanese and started "living like us". These descriptions illustrate the foreign workers as a people who make valuable contributions and are making an effort to integrate to the existing culture, which could work to push the readers to become more accepting. In the end, the article presents Professor Menju's statement that explicitly states that what Japan needs right now is to prepare an environment for foreigners in Japan and to shift to the mindset of expecting foreigners to become a contributing valuable citizen of our society. Through these descriptions, the Asahi Shimbun represents foreign workers as an indispensable and active member of Japanese society, pushing the inclusive perspective.

4.2.2 Evolving Toward Interculturalism as Shared Inclusion Model

A notable 2026 article demonstrated a particularly strong advocacy for an inclusive society. In 2025, most articles promoted integration as a process of immigrants adapting to the existing local traditions. The article "Interculturalism That Is Neither Assimilation nor Exclusion: A Philosophy for Weaving Together Immigrants and Society" presented interculturalism as an alternative approach. Interculturalism encourages interaction between different cultural groups to create a society adapted for people of diverse backgrounds (Matsuura, 2026). Interculturalism differs from the assimilation approach prevalent in 2025, as it acknowledges diversity and difficulty of one-sided integration, and frames inclusion as a shared responsibility between the local and foreign population, representing a stronger advocacy for immigrant inclusion. The interviewee, a researcher of immigrant policy, even described exclusion and forceful integration as violent (Matsuura, 2026). While other articles maintained an inclusive approach based on the previous assimilation model, the interculturalism piece represents Asahi Shimbun's more assertive and equitable model for inclusion.

4.2.3 Acknowledging Real Integration Challenges While Maintaining Inclusive Framing

Asahi Shimbun extensively illustrates the challenges arising from the increasing foreign population. As suggested by the title,"'We Don't Want Them to Increase, But We Have to Welcome Them' – The Reality of Regional Public Housing Dependent on Foreign Residents" it covers the struggles of a district in Hokkaido, an area with the largest increasing rate of foreign population. Despite the initiatives to promote interaction between the local and foreign population, issues caused by recycling practices, loud noises, and parking rule violations generated tension. When the city council proposed "A Community-Building Ordinance for Coexistence and Connection", over two thousand comments were submitted in a month, many expressing negative perspectives such as that integration was impossible or that Hokkaido's local identity was threatened (Otaki & Suzuki, 2026). The volume and tone of these comments indicate heightened public interest on immigration issues and rising frustration. Nevertheless, this article ultimately followed the structure prevalent in 2025 articles, which was concluding with an inclusive note. The article ended by reporting inclusive voices, such as professor Takashi Miyairi stating the indispensable workforce provided by the foreign population and the necessity to think about coexistence. By structuring the article this way, Asahi Shimbun maintains its reporting pattern and stance from 2025, yet acknowledges public frustration regarding immigrants, signaling a more nuanced recognition of the difficult reality of integration.

5 Discussion and Limitations

Nonetheless, the method presents limitations. The main limit lies in the inherently subjective nature of qualitative analysis. Despite attempts to mitigate this through re-reading, the analysis is still influenced by our own interpretative framework and ethical opinions. The decision to exclude articles which foreign workers only appeared as a peripheral subject creates another limitation. As the boundaries between central and peripheral focus are not clear-cut, this may skew findings. Furthermore, this paper solely focuses on the *Asahi Shimbun*; thus, cross-comparing with other newspapers on a diverging political spectrum (Akahata Shimbun, Yomiuri Shimbun) might broaden this study's scope and strengthen the representativeness of the findings.

6 Conclusion

Overall, the study examined how Asahi Shimbun framed the issue of foreign workers during Japan's 2025 House of Councillors and 2026 House of Representatives elections. Based on the framing theory and critical discourse analysis, the research critically assessed selection issue, voice distribution, and fact verification to uncover how journalistic narratives construct public understanding of foreigners in Japan. Across both elections, Asahi Shimbun consistently adopted an inclusive narrative of foreign workers, portraying them as indispensable contributors to the Japanese economy and society. Through its choice of interviewees, emphasis on human stories, and systematic refutation of misinformation, the newspaper challenged exclusionary rhetoric advanced by conservative parties, notably Sanseito. Articles' structure, involving a conclusion with inclusive voices and data-based corrections, reflects and reinforces a normative stance that values coexistence and rational debate over emotion-led populism. Meanwhile, the 2026 coverage revealed a more nuanced recognition of integration challenges. While continuing to promote inclusion, Asahi Shimbun increasingly acknowledged local tensions and public anxiety, shifting from an implicit defense of immigrant presence to a more balanced discussion of coexistence. Ultimately, the findings suggest that Asahi Shimbun functions not only as a transmitter of information, but as a moral and political agent shaping the discourse on national identity. During election periods, when narratives involving foreigners risk becoming polarized, the newspaper used framing and fact-checking to moderate public debate and promote diversity.

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Section

III

Domestic Politics and Governance

Three papers turn to the internal mechanics of political order: how patronage networks shape electoral outcomes in Thailand, why the Korean peninsula remains structurally divided seven decades after the armistice, and how Japan's ageing population is testing the limits of its sovereign debt model.

CONSTITUENCY OVERPERFORMANCE IN THAILAND:

A Simple Political Patronage Indicator

Asia Pacific Research Circle

Sciences Po

Thanapat SKULPANICH

May 2026

Abstract

On May 14th 2023, a striking phenomenon could be observed in Thailand's parallel voting system. Though the progressive Move Forward Party won 38% of the party-list votes, it achieved only 25.4% of the constituency votes. Conversely, while the conservative Bhumjaithai party won 3% of the party-list vote, they gained 13.5% of the constituency vote. According to Napon and Mathis (2023), one interpretation of this discrepancy could be that candidates strategically engineered ballot splitting. While Napon (2022) illustrated that candidate strategies rely on patronage politics, his paper did not systematically quantify the extent of their use. Consequently, this paper analyses the extent to which the constituency vote's overperformance during the 2023 election could serve as a proxy for local patronage politics. Using primary data from the Electoral Commission, the National Statistics Office, and Rocketmedialab, this study addresses the lack of quantitative research on the relationship between electoral and patronage politics. Although there was a weaker negative correlation between constituency overperformance and provincial household income (r = -0.167), the results showed a significant positive correlation between constituency overperformance and twin-vote excess (a vote-buying proxy; r = 0.486). Furthermore, there is an increasing concentration of patronage-linked elected candidates across quantiles of increasing constituency overperformance. These findings suggest a significant positive relationship between elements of patronage politics and constituency overperformance.

Keywords: electoral analysis, Thai election, political patronage, dynastic politics

Author Note

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Notable Remarks

Third place prize winner, 23rd of April, Symposium

1 Introduction

Since the 2023 election, Thailand has adopted a parallel voting system of constituency and party-list ballots. Of the 500-member parliament, 400 members are elected from their respective constituencies on a first-past-the-post system, while 100 members are elected from the national party-list ballots. The total number of party-list votes is divided by 100 seats to get the number of votes a party must receive in order to secure one party-list MP. Voters are able to freely choose to vote for a candidate from one party on the constituency ballot and perhaps vote for another party on their party-list ballot. This has coincided with the growing prominence of progressive movements in Thailand, as reflected in programmatic parties such as *Move Forward*. Prior to this, "money politics" was the predominant patronage strategy in Thai elections. Vital to patronage politics are vote-canvassing networks mobilized for purposes of distributing cash handouts or conducting "everyday patronage". Crucial to its function are the vote canvassers (*huakhanaen)* who more often than not are individuals in local administration organizations, village heads, or village health volunteers with personal connections to the electorate (Napon, 2022). With this clash between new forces and traditional parties, the phenomenon of ballot splitting has been argued to emerge, leading to constituency overperformance as voters opt for programmatic parties in the party-list ballot while clinging to historical patrons in the constituency vote (Napon & Mathis 2023). If this assertion were true, it would imply that constituency overperformance could indicate the level of patronage politics in an area. Since information concerning the actual extent of patronage politics–the amount of money spent via vote-canvassing networks, the scale of such networks, and inter-personal connections–would be systematically unobtainable, the ability to calculate an estimate via publicly accessible data would allow us to forego the impossible task.

In this paper, I will begin by first constructing an index to measure the level of constituency overperformance ("the index"). With this index, I will then relate this index to other indicators of political patronage: a proxy for coordinated voting patterns (twin-vote excess), socioeconomic status (SES), and the characteristics of the elected candidate. Firstly, as twin-vote excess is a byproduct of political patronage, the index will be tested to reveal how much of this byproduct it captures. Secondly, while the level of urbanization is conventionally posited as the determining factor of susceptibility of political patronage within an area, since electoral district-level data on it does not exist, this analysis has opted for a related factor, household income, as the measure of SES. From this, we assume that political patronage becomes less attractive as household income increases, as voters are less financially dependent on patrons. Thirdly, as the final test of the index's indicative power, the paper examines whether there is a greater concentration of patronage-linked winners in provinces with higher index values.

2 Methodology

Let $d \in \{1, \ldots, D\}$ index electoral districts and $p \in \{1, \ldots, P\}$ index political parties. Let CV_{dp} denote the share of constituency votes received by party p in district d, and let PLV_{dp} denote the share of party-list votes received by party p in district d. This model first calculates the constituency overperformance coefficient for each party (r_{dp}):

$$r_{dp} = max\{0,\ log\left(\frac{CV_{pd} + \varepsilon}{PLV_{pd} + \varepsilon}\right)$$

A log transformation is applied to capture proportional constituency overperformance while stabilizing the index and preventing extreme ratios from dominating the district-level measure. ε is added to avoid the model breaking down with parties whose CV or PLV votes are close to or equal to zero. The max{} function ensures the index accounts only for cases of constituency vote overperformance, consistent with the expectation that patronage-linked mobilization increases candidate-level support rather than reducing it. Additionally, in districts where no candidates from a given party are running in the constituency vote, the function also removes this problem, as such a party would return a negative log transformation, causing the function to set the coefficient to zero.

With r_{dp}, we can then calculate the constituency overperformance index for each district (R_d):

$$R_d = \sum_p w_{pd} r_{pd}$$

where the weight (w_{pd}) is equal to:

$$w_{pd} = \frac{CV_{pd} + PLV_{pd}}{2}$$

Here, the district index is calculated as the sum of the party vote-splitting coefficient, multiplied by its weight (the average of its CV and PLV vote shares), to appropriately scale constituency overperformance within a district without overweighting small parties. A provincial constituency overperformance index can also be calculated by averaging the district indices within each province.

$$R_P = \underline{R}_d$$

3 Analysis and Findings

Once we run our model on the 2023 Thai Legislative Election dataset, the index can be observed, for $\varepsilon = 10^{-9}$, for each district, as illustrated in Figure 1. With this district-level index, testing can be conducted as previously described to test its effectiveness.

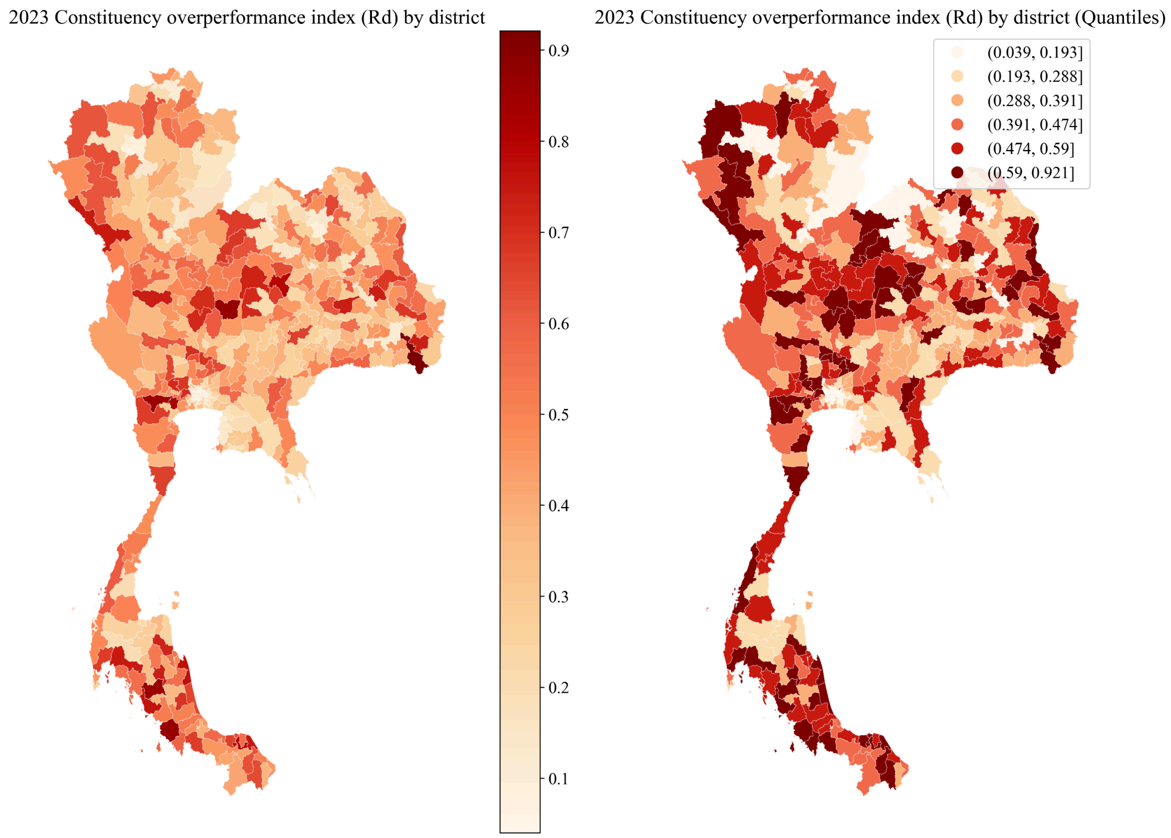

Figure 1: 2023 election constituency overperformance index by electoral district

3.1 Twin-vote excess

With the recent 2026 elections, an indicator for vote-buying utilizing the concept of a "twin-vote" has been popularized. At its core, the twin-vote index assumes that, as part of vote-buying, voters might be instructed to vote for a certain number on the constituency ballot and, for simplicity's sake, the same number on the party-list ballot. Though, since the number of the party on the party-list ballot will almost always not correlate with the number on the constituency ballot, another party will reap the benefit of this vote-buying through the party-list vote. We can apply the same logic to the 2023 elections and observe that all parties whose party-list numbers ranged from 1 to 13 received abnormally high party-list votes.

In this paper, we define a "twin party" in a district as the party whose party-list ballot number corresponds to the victorious candidate's constituency ballot number. The significance of the twin-vote phenomenon can be illustrated by comparing the average party-list vote of parties numbered 1-13 on the party-list ballot in districts where they are a twin party and in districts where they are a non-twin party (Figure 2). We exclude numbers 7 and 11 (referring to Bhumjaithai and Prachachart, respectively) because both parties are small- to mid-sized, unlike other parties in this range, which are relatively obscure micro-sized parties.

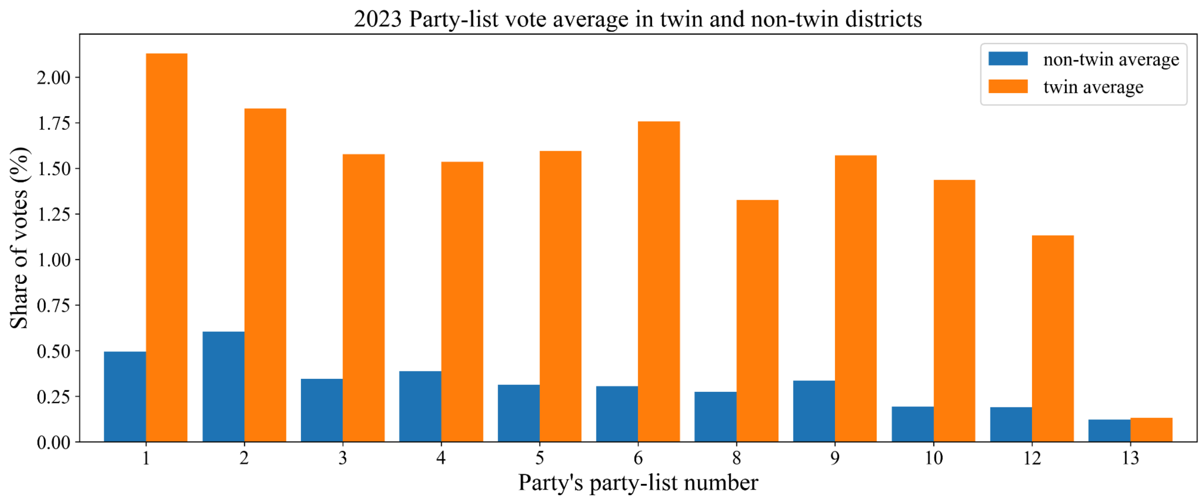

Figure 2: Comparison of party-list vote average in twin and non-twin districts

Linking back to the constituency overperformance index, the correlation between R_d , and the twin-vote excess in each district (taken as the difference between the twin party's party-list vote share minus the party's party-list average vote share in non-twin districts) can be calculated. It follows that in districts with higher levels of patronage, we should expect to see higher amounts of twin-vote excess as a result of patronage-linked voter mobilization.

We can observe a significant positive correlation between R_d the district twin-vote excess. Of all 400 districts, only 361 are included in this scatterplot due to the removal of Bhumjaithai and Prachachart (party-list numbers 7 and 11, respectively). We can also observe a cluster of low R_d and negative twin-vote excess districts which, upon analysis, share common characteristics of being either urban areas (Bangkok metropolitan, Chiang Mai, Phuket, Chonburi, Rayong, and a few other regional centers), districts where the winning candidate is from the Move Forward Party, or both.

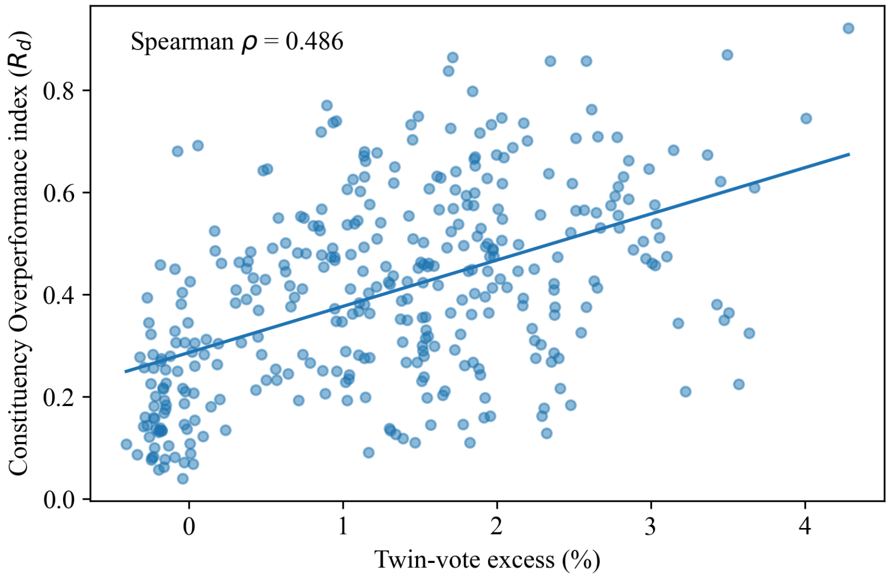

Figure 3: Twin-vote excess (excl. 7 and 11) and constituency overperformance index (R_d)

3.2 Household income

Another often cited indicator of patronage is urbanization, often defined by population density (Hicken et al., 2023; Laothamatas, 1996). Given the lack of population density data for electoral districts, this analysis has used socioeconomic status (SES) as a related indicator. Because of the difficulty of calculating SES data at the electoral district level, I have chosen to use provincial SES data, keeping in mind the effect on the precision of the results. With this change, we can no longer use R_d it and instead opt for R_p the previously defined provincial constituency overperformance index. The SES data used in this comparison are the provincial median household income from the National Statistics Office. For this test, we should expect a negative correlation between R_p household income. Areas with higher SES would be expected to exhibit lower levels of patronage politics, as the population is less financially dependent on patrons and therefore more likely to be attracted to programmatic parties and candidates.

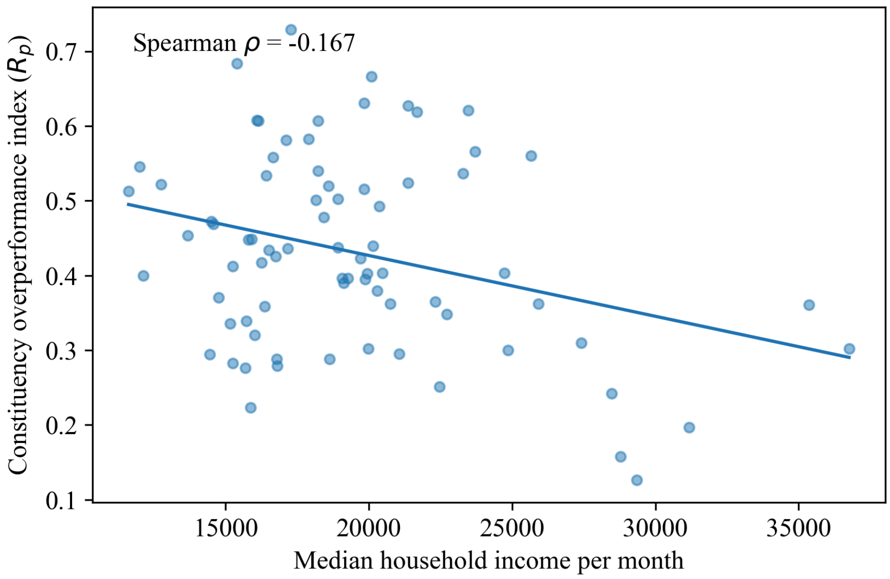

Figure 4: Provincial household income and provincial constituency overperformance index (R_p)

Though milder than the correlation with district twin-vote excess, we still observe the expected negative correlation between median household income and R_p. This weaker correlation can be explained by the presence of lower-than-average-income provinces, such as Chiangmai (18620 baht), with relatively low R_p (0.288), and higher-than-average-income provinces, such as Krabi (21680 baht), with relatively high R_p (0.619).

The choice of SES over population density (urbanization) potentially poses an issue. In the case that both SES and patronage are influenced by population density, the relationship between SES and patronage would merely be indirect. Testing of the index and population density would be an alternative method for further research.

3.3 Incumbents and dynastic relations

Incumbents and dynastic relations between the candidate and influential local figures are characteristic of the theories and practices of political patronage (Napon, 2022). With local power, candidates could mobilize vote-canvassing networks and leverage local ties to achieve clientelist ends. In this section, I sourced historical data on elected candidates from Rocketdatalab. Features of patronage are as follows:

- **Incumbent** (or otherwise as *"non-incumbent"*)**:** elected candidates who were previously elected MPs in 2019.
- **Ex-incumbent:** elected candidates who were elected MP in prior years are classed as.
- **Dynastic** (or otherwise as *"non-dynastic"*): elected candidates who are related (de jure or de facto) to other political figures (MPs, ministers, local politicians, local or national figures).

- **Local administration:** elected candidates who were members or leaders of local administration (including advisors).

Categorization is done through a python script which scans the elected candidate history data and detects keywords “ส.ส. พรรค” (MP of party) and excludes “ผู้สมัคร ส.ส. พรรค” (candidate MP of party); if after exclusion, “ส.ส. พรรค” still remains to be flagged (meaning they were not merely a candidate but were elected in previous election), the elected candidate is flagged as an *incumbent*. Similarly, if the script detects “บุตร” (child), “เครือญาติ” (family), “พี่” (older sibling), “น้อง” (younger sibling), or “หลาน” (grandchild), the elected candidate will be flagged as dynastic. Afterwards, I conducted a manual review of all the lists, fixing flagging mistakes, differentiating *incumbents* from *ex-incumbents*, and assigning values for *local administration*. Once this is done, a dataframe of elected candidates with four boolean columns (*Incumbent, Ex-incumbent, Dynastic, and Local administration*) is created. A breakdown of this dataframe is shown in Figure 5.

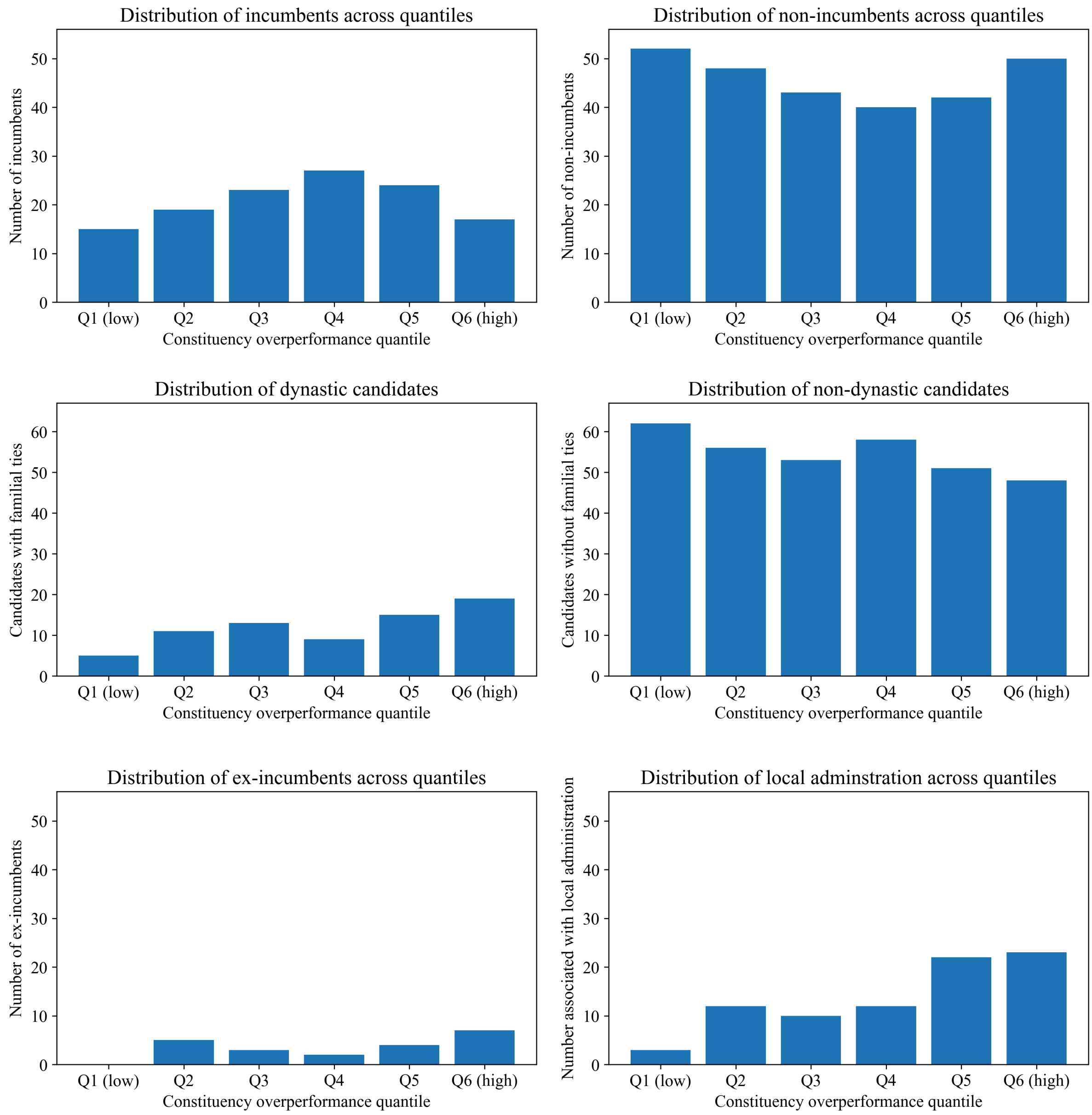

Figure 5: Distribution of classes of elected candidates across quantiles

It can be observed that from Q1 to Q4, there are more elected candidates who are incumbents than non-incumbents. Similarly, there are more elected candidates with dynastic backgrounds as we move to higher quantiles (except for Q4). It can be observed in Figure 6 that once we supplement incumbent elected candidates' data with dynastic and local administration data, there is a monotonic positive increase in elected candidates with patronage-linked characteristics, except in Q4, where there is a slight decrease. In this final graph, we see that the number of elected candidates exhibiting patronage-linked characteristics increases with higher quantiles, peaking at Q6.

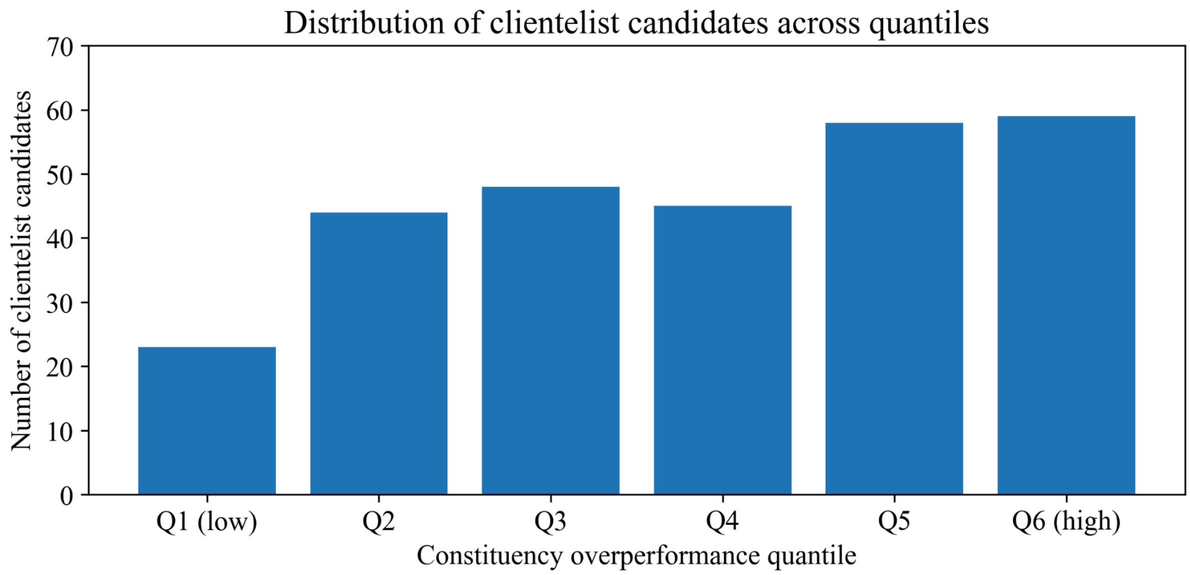

Figure 6: Distribution of elected candidates with clientelist characteristics across quantiles

4 Limitations

Our model assumes that if the constituency and party-list votes are perfectly aligned, there is no degree of political patronage, but this is not always true. Given an election, if all parties engage in political patronage and both parties are non-programmatic, an unmotivated electorate could theoretically prevent vote-splitting. Therefore, this model also assumes the existence of programmatic and non-programmatic parties, which incentivises candidate overperformance, as noted by Napon and Mathis (2023).

On the other hand, if, for a given district, the difference between constituency and party-list votes stems from the electorate's preference for a particular candidate that is not linked to patronage, the coefficient will still indicate that patronage exists.

5 Conclusion

Throughout this paper, we studied the validity of candidate overperformance as an indicator of political patronage. Conducting empirical tests with 2023 election data, we compared our index to other political patronage indicators (twin-vote excess, household income, and candidate background). Overall, the paper finds a significant positive relationship between elements of patronage politics and constituency overperformance. The index showed a positive correlation with twin-vote excess, a negative correlation with household income, and an increasing concentration of elected candidates with patronage characteristics across higher quantiles. For further proofing and this index, another test should be conducted once complete datasets of the 2026 election are released

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FROM ONE PENINSULA TO TWO REGIMES

Historical Geography, Colonial Asymmetry, and the Political Permanence of Korean Division

Asia Pacific Research Circle

Sciences Po

Isabella MARTINS

May 2026

Abstract

The division of the Korean Peninsula is conventionally attributed to Cold War rivalry. Yet, this explanation fails to account for why the division has persisted long after the Cold War ended. This paper asks how historical and geographical factors have sustained and deepened the separation between North and South Korea, arguing that the Cold War was the final layer of a far older structural process. Through comparative historical analysis of primary sources, the paper develops a three-part causal model: pre-modern regional differentiation between a militarised north and an agrarian south rendered division structurally conceivable; Japanese colonial policy deepened these asymmetries into two distinct political economies, making division institutionally feasible; and great-power state-building after 1945 rendered division politically permanent. The paper further argues that divergence in language, cultural identity, and heritage politics has since embedded division beyond the reach of diplomacy. These findings suggest that conventional policy approaches – denuclearisation agreements, confidence-building measures, cultural exchange – are structurally limited when the foundations of division predate the conditions they aim to address. The Korean division is not a frozen conflict awaiting resolution; it is a centuries-layered reality.

Keywords: Korean division, historical geography, colonial asymmetry

Author Note

I am grateful to Professor Pierre FULLER for guidance on the research design and to APRC for the opportunity to present this work, and declare no further conflicts of interest.

Notable Remarks

“Wonderful and adventurous” – David Camroux, 23rd of April, Symposium

1 Introduction

The division of the Korean peninsula stands as one of the most dramatic political splits in the modern world. Despite their similar ethnicity, language, pre-modern history, and cultural heritage, North Korea, officially known as the Democratic People's Republic of Korea (DPRK), and South Korea, officially known as the Republic of Korea (ROK), are divided by one of the world's most heavily fortified and militarised borders, the DMZ. The division has now been in place for over seven decades, outlasting the Cold War, which is most frequently cited as its cause. To understand why this is the case, it is necessary to move beyond the usual explanations and uncover the underlying historical and geographical structures that determine the political destiny of the Korean Peninsula.

For centuries, the Korean Peninsula has served as a disputed corridor for military projection, continental trade and strategic competition due to its unique geopolitical location between China, Russia and Japan. The peninsula's political development has been shaped by this geography, not the other way around. This paper argues that the division of the Korean Peninsula cannot be explained in 1945 but rather in the region's pre-modern history, extending back to the era of the Three Kingdoms.

The Puzzle

The underlying puzzle that drives this research is as follows: if the Korean War was brought to an armistice in 1953, and the bipolar structure of the Cold War was dissolved with the collapse of the Soviet Union in 1991, why is the Korean Peninsula still divided along political lines, and why does the idea of reunification seem not only challenging but increasingly impossible? From the 1972 Joint Communiqué to the inter-Korean summits in 2000 and 2018, diplomatic efforts have failed to change Pyongyang-Seoul relations in any long-term or structural way for more than 50 years. Traditional explanations that portray division as the unresolved legacy of an "unfinished war" or the result of continuous military rivalry are empirically inadequate. If division is the result of hostility, then the end of great-power competition should have brought about much more progress towards normalisation than has been achieved.

Real-World Relevance

This puzzle has significant real-world implications in three areas. First, in the realm of diplomacy, approaches that centre on purely military de-escalation, such as confidence-building measures, denuclearisation agreements, and peace declarations, are inherently limited if the underlying institutional and identity-based drivers of separation persist, maintaining the separation between the two states. Second, in the realm of security, the Korean Peninsula is one of the most militarised regions in the world, with over one million soldiers stationed on both sides of the Demilitarised Zone; a full understanding of what actually maintains the status quo in Korea is a necessary precursor to any meaningful policy intervention in the region. Third, analytically, reunification has become a strategic threat rather than a political aspiration for both regimes – a dynamic this paper seeks to explain.

Research Question

This paper will argue against two basic assumptions commonly held in public discourse and literature. The first is that the Korean Peninsula was a politically homogeneous or undifferentiated region before 1945. The second is that the persistence of division is essentially due to the unresolved war and superpower rivalry. Against both assumptions, the paper poses the following research question:

> *How did historical and geographical factors sustain and develop the division between North and South Korea?*

The only way to explain the persistent political differences between North and South Korea is to consider the sum of three interrelated historical forces: pre-modern functional regional differentiation, colonial structural asymmetry, and post-1945 great-power state-building. Historical geography made division possible, colonialism made division structurally feasible, and Cold War intervention made division politically permanent. The paper has four sections: a literature review that situates this argument within the existing literature; three sections of analysis, each examining one of the three causal layers; and a conclusion that synthesises the results.

2 Literature Review

The literature on the division of Korea appears to fall into three broad areas, each shedding light on one aspect of the question but leaving gaps in the analysis which this paper hopes to plug.

Carter J. Eckert et al. – Korea Old and New: A History (1990)

Eckert et al. provide one of the most detailed historical accounts of the Korean Peninsula available in English, and their work was essential in the paper's first two causal claims. Their discussion of the Joseon dynasty shows a polity that was, in fact, far from homogeneous in the way that nationalist historiography has often suggested: state capacity was variably distributed, different military and frontier administrative systems ruled the northern regions, and the opposition between the agrarian south and the continentally-tilted north was institutionalised in the dynastic state from at least the fifteenth century (Eckert et al., 1990). The authors also offer essential information about the colonial period, showing how the Japanese industrial policy systematised and deepened these pre-existing differences by locating heavy industry and extractive infrastructure in the north while developing the south for agriculture and light industry. However, the book's most significant limitation is that its historical scope necessarily comes at the expense of analytical depth into why a division was a political system rather than simply a geographical fact, a problem addressed by Kim Hak-joon.

Bruce Cumings – The Origins of the Korean War (1981, 1990) and Korea's Place in the Sun (2005)

Cumings, an indispensable historian on Korea, provides the most rigorous longue durée analysis available in English-language literature. Volume I of The Origins of the Korean War (1981) documented the emergence of separate regimes between 1945 and 1947, suggesting that American and Soviet state-building built upon existing social and regional divisions rather than fabricating them from scratch. The author insists that Korea's division must be understood through the deep structural tensions internal to Korean society – including north-south economic differentiation, divergent political cultures, and the social dislocations produced by colonial rule – rather than as a purely exogenous Cold War imposition (Cumings, 1981). This structural sensitivity underpins this paper's first two causal claims, lending authority to the argument that the 38th parallel reflected real and longstanding asymmetries rather than arbitrary partition. Cumings, however, is less attentive to the mechanisms by which division became self-reinforcing after the end of the Cold War, and his analysis of institutional path dependence is less developed than his account of origins – a gap that Kim Hak-joon's work addresses.

Kim Hak-joon – North and South Korea: Internal Politics and External Relations Since 1988 (2006)

Kim Hak-joon's study is one of the most directly relevant works to this paper's concluding argument and will be engaged with extensively in the third section. From a Korean academic perspective, by focusing on the internal politics of both states, Kim shows that the division's sustainability cannot be attributed solely to external intervention. His study of inter-Korean relations since 1988 shows that attempts at diplomatic engagement repeatedly failed, not because of military competition. Still, internal politics of both the DPRK and the ROK had become structurally invested in division as a source of legitimacy and stability. Institutions, elite incentives, and national identity had all been organised around the fact of division, making reunification not only difficult but also institutionally destabilising for both sides (Kim, 2006). His reading of 1945–1948 as a period in which great-power state-building exploited rather than created existing structural conditions is particularly insightful. His limitation, however, is the reverse of Eckert's: centred on the post-1988 era, his work lacks the systematic historical excavation that Eckert et al. and Cumings provide.

Taken together, the three texts shed light on different levels of the question, yet none attempts to synthesise long-term institutional history, structural and social history, and the politics of the post-Cold War era. Nor do they discuss the increasingly important role of linguistic and cultural differences as a self-perpetuating source of division. That is the goal of the present paper.

3 Methodology

This paper employs comparative historical analysis to examine the political development of the Korean Peninsula from the Three Kingdoms period through Japanese colonial rule to the establishment of the two competing states after 1945. The method is guided by the need to establish causal mechanisms at each historical layer rather than to narrate a sequence of events. Four primary sources provide direct empirical evidence for the paper's three-part causal argument. The *Samguk sagi*, the twelfth-century chronicle compiled by Kim Pu-sik, provides evidence of pre-modern political differentiation extending back to the Three Kingdoms period. The *Annals of the Joseon Dynasty* (*Joseonwangjo sillok*) document patterns of pre-modern regional administration that prefigured the north–south institutional divide. USAMGIK Ordinance No. 19 (1945) attests to the immediate structural consequences of the colonial economic geography at the moment of liberation. Stalin's letter to Kim Il-sung in October 1950, relayed through the Soviet ambassador, Shtytkov, and preserved in the Presidential Archive of the Russian Federation, provides direct evidence that the peninsula had been subsumed into great-power security logic by the time of the Korean War. The analysis is thematic and chronological, organised around the paper's four-part causal model, and is supplemented throughout by secondary literature to contextualise and corroborate the primary-source findings.

4 Historical Geography – Functional Regional Differentiation Before 1945

The Korean Peninsula has never constituted a politically homogeneous entity (Eckert et al., 1990). Before the onset of the Cold War, the Korean Peninsula had already displayed permanent functional asymmetries in governance, security alignment, and economic organisation between its northern and southern parts (Eckert et al., 1990; Lew, 2000). Pre-modern structural asymmetry set the stage for the development of separate state-building projects in 1945, although it did not guarantee their appearance.

Figure 1. The Three Ancient Korean Kingdoms (c. 400 CE). Source: Encyclopædia Britannica. (2009). Three Kingdoms period [Map]. Britannica.com. https://www.britannica.com/topic/Three-Kingdoms-period

The roots of these distinctions stretch back even before the Joseon Dynasty. As Lew (2000) shows, the history of the Korean Peninsula until Silla's unification of the Three Kingdoms in 668 CE was a history of political fragmentation and conflicting external influences. According to the Samguk sagi, the oldest surviving historical text dealing with the peninsula, written by Kim Pu-sik in 1145 CE, the earliest kingdom, Koguryŏ (37 BCE-668 CE), the northernmost of the Three Kingdoms, was established in the middle course of the Yalu River in southern Manchuria, where it developed as a militarised continental empire. By the fifth century, Koguryŏ dominated the northern half of the Korean Peninsula and a vast area in Manchuria, and was the first of the Three Kingdoms to adopt Chinese models, founding Korea's first National Confucian Academy in 372 CE. Its increasingly aggressive continental policy led it into recurring clashes with the Sui and Tang Dynasties of China until it was ultimately brought under control by the Tang-Silla coalition in 668 CE (Lew, 2000). Unlike the other kingdoms, the kingdom of Paekchae (18 BCE-660 CE) controlled the fertile south-western lowlands of the peninsula. It developed into an agriculturally prosperous, maritime-oriented kingdom with significant cultural and diplomatic ties to Yamato Japan. Silla (57 BCE-935 CE), controlling the south-east of the peninsula, would eventually win Chinese support for the unification of the peninsula and rule it through a centralised bureaucratic system with Confucian undertones. The peninsula had already established a structural dynamic long before the Joseon period: a militarised, continentally oriented north facing an agriculturally oriented, bureaucratic south. These are not minor observations. They are the earliest layer of the institutional topography on which all subsequent divisions would be mapped. Crucially, the structural pattern did not dissolve with Silla's unification of the peninsula in 668 CE. The unified Silla kingdom and its successor, the Koryŏ dynasty (918–1392 CE), both found themselves perpetually preoccupied with the security of the northern frontier against successive waves of continental pressure – the Khitans, the Jurchens, the Mongols – while the political and cultural centre of gravity remained anchored in the south. Unification produced a single sovereign authority, but it did not produce institutional homogeneity. The north continued to be administered as a militarised buffer zone; the south as the agrarian and bureaucratic core. When the Joseon dynasty was established in 1392 CE, it inherited this asymmetry wholesale and, if anything, deepened it through its own administrative rationalisations.

This differentiation was also attested to by the Annals of the Joseon Dynasty (Joseon Wangjo sillok), which documented the systematic garrisoning of the northern frontier regions under military administration, in stark contrast to the civil-bureaucratic and legal administration of the southern provinces (Joseon Dynasty Annals; Eckert et al., 1990). The northern regions, which bordered Manchuria and were constantly threatened by the Jurchen and Manchurian states on the Asian continent, were administered through a system of institutions geared towards security and kept under the watchful eye of the royal military at all times (Eckert et al., 1990). The southern provinces, on the other hand, remained the agrarian and administrative heartland of the Joseon Dynasty, with a civil administration system that was influenced by Confucian ideology, land taxation, and the management of grain surpluses for the capital at Hanyang (now Seoul). The Annals are particularly significant as primary evidence because they represent the Joseon state's own self-understanding of its territory:

rather than projecting an imagined administrative uniformity, the royal records explicitly distinguish between the “core provinces” of the south and the militarised frontier zones of the north, treating them as requiring fundamentally different instruments of governance. This was not a peripheral administrative detail; it was constitutive of the dynasty's conceptualisation and management of political space on the peninsula. The north was not simply poorer or more remote – it was institutionally other, governed through a security logic that had no counterpart in the southern provinces. What the Annals record, in other words, is not merely regional variation but the systematic institutionalisation of asymmetry across several centuries of dynastic administration.

These structural legacies were not deterministic of division. They had coexisted for centuries within a single political framework, and the peninsula had been unified under successive dynasties despite its internal asymmetries. Their importance was structural rather than determinative: they did not make division inevitable, but they made certain forms of division far more institutionally coherent than others. A division along a north-south axis, separating a militarised continental interior from an agrarian maritime periphery, was not arbitrary – it followed the grain of institutional history. A division along an east-west axis, or one that placed the capital at Hanyang in the northern zone, would have cut against that grain entirely. This is the precise analytical contribution of historical geography to the paper’s causal model: it explains not only that division occurred but why it took the specific form it did. The asymmetrical institutional landscape of the peninsula – different traditions of governance, security orientation, and economic organisation – defined the range of politically coherent options available to external state-builders when the moment of division arrived in 1945 (Eckert et al., 1990).

In short, Korea had never been a tabula rasa. Its regional structures prefigured the social and institutional landscape onto which foreign intervention would eventually project. This is Cumings’s argument (1981). Historical geography is the first level of causality in the argument presented in this paper. It not only explains why the division followed a north-south axis but also why particular paths to political change were possible in 1945. But it does not tell us why the division has persisted. For this, we turn to Japan’s colonial rule.

5 Colonial Asymmetry – How Japanese Rule Transformed Differentiation into Structural Division

The Japanese colonial state (1910-1945) did not simply inherit and reproduce existing regional inequalities; rather, it rationalised and intensified them to such an extent that two materially different political-economic spaces had been created by the time of liberation in August 1945.

Colonial industrial policy focused on developing heavy industries, hydroelectric facilities, and infrastructure for extracting resources in the northern regions of the peninsula (Foreign Languages Publishing House, 1961; see also Cumings, 2005, pp. 148–162). While this figure originates with a North Korean state publisher and must be read with appropriate critical caution, its substantive claims regarding the concentration of heavy industry in the north are corroborated by independent scholarship. This was due to the North’s proximity to

Manchuria, its rich mineral resources, including coal, iron ore, and tungsten, and its existing continental logistical network. These factors made it a suitable location for imperial economic development in North East Asia. By contrast, the Southern region was developed for agrarian supply, light industries, and maritime trade. These developments had significant and lasting economic implications for Korea (Cumings, 2005; Eckert et al., 1990). As both Matray (1981) and Chang-Il (2020) have shown, when the 38th parallel was drawn in August 1945, it was not a single, integrated Korean economy that was divided, but one that was already divided into two interdependent halves. As Chang-Il (2020) has noted, the line passed through over seventy-five streams, twelve rivers, six north-south railway routes, and several villages, proving that it divided a geography already restructured along a North-South axis over several decades of colonial development.

The most striking example of this colonial geographical inheritance is to be found in USAMGIK Ordinance No. 19 (1945), whereby the American occupying forces in the south were forced, just a few short weeks after the Japanese surrender, to institute emergency economic regulations to deal with the immediate consequences of the sudden severance of the south from the industrial base of the north, upon which the southern economy had come to depend. Colonial restructuring had transformed regional differentiation from a cultural aspect of governance into a geographical reality (Eckert et al., 1990). In 1945, the Korean Peninsula possessed two distinct economic geographies: industrial-continental in the north, agrarian-maritime in the south–an achievement that predated great-power intervention by several decades.

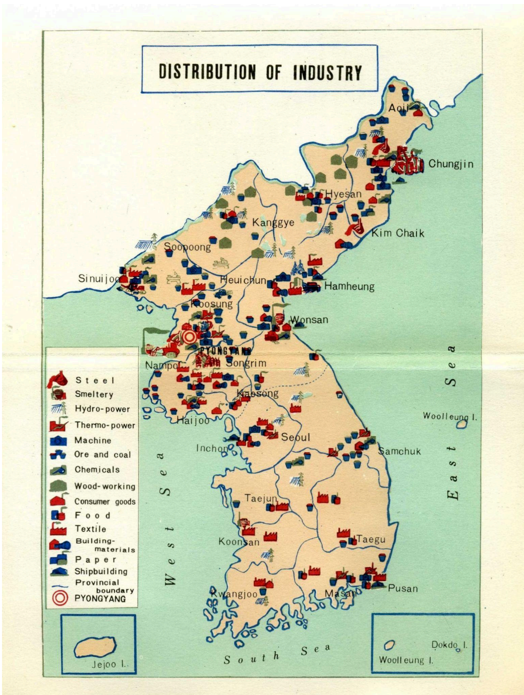

Figure 2. Distribution of Industry across the Korean Peninsula. Source: Foreign Languages Publishing House (1961). Facts About Korea (map insert). Pyongyang: DPRK. [Note: North Korean state publication; industrial distribution data corroborated by Cumings (2005) and Eckert et al. (1990).]

As Kim Hak-joon (2006) shows, the internationalisation of Korea's internal conflict after 1945 developed in a fashion that was prefigured by the country's colonial history. The external actors did not dictate the parameters of division; rather, they used pre-existing structural parameters. Colonial asymmetry thus constitutes the second level of causality developed in the current paper, which not only sheds light on the structural predispositions of the Korean peninsula toward division along the north-south axis, but also on the institutional preconditions for maintaining two separate and self-contained political-economic systems.

6 Great-Power State-Building – How Cold War Intervention Made Division Permanent

The state-building projects of the Soviet Union and the United States after 1945 did not entail the division of a neutral or homogeneous space as a structural fact. Instead, they deliberately leveraged and embedded the inherited structural asymmetries of historical geography and colonialism, etching ideology, politics, and legitimacy into two mutually exclusive spaces.

The primary sources are at their most revealing at this level of analysis. Stalin's October 1950 letter to Kim Il-sung, relayed through Soviet ambassador Shtytkov, is the paper's most analytically revealing primary source (Stalin, 1950). Read closely, it does three things at once. First, it transmits Mao Zedong's commitment to deploy a minimum of five to six Chinese divisions, confirming that China's entry was negotiated at the Soviet level, not spontaneously offered – North Korea's survival was, from the outset, contingent on great-power calculation rather than Korean agency. Second, Stalin frames the conflict explicitly as a test of US resolve, arguing that America is "not ready at present for a big war" and that a favourable outcome in Korea would deny the United States Taiwan and block Japanese rearmament. Korea's division, in other words, is not treated in this document as a Korean political problem: it is a lever in Soviet grand strategy across the Pacific theatre. Third, and most importantly for this paper's argument, the letter reveals that by October 1950, a permanent, Soviet-aligned North Korean state was already so embedded in Soviet strategic architecture that its dissolution had become structurally unthinkable. Division was no longer merely a temporary administrative fact but a cornerstone of Soviet strategic thinking in northeast Asia. Armstrong (2002) illustrates that the Soviet state-building project in the north was intentional and constructivist, as the party-state of Kim Il-sung was built with active Soviet involvement, drawing on the pre-existing industrial concentration in the north, the continent's security geography, and the pre-existing traditions of centralised administrative power. In the south, Matray (1981) finds that American state-building, while more ad hoc and reactive, operated through pre-existing bureaucratic channels, maritime geography, and trade-based economic organisation – the very same foundations laid down by colonial geography. Chen Jian (1994) verifies that Chinese involvement in the Korean War further solidified this division, as Chinese leaders came to see a North Korean buffer state as a necessary component of their own continental security.

What most distinguishes this level of causality from the first two is the institutionalisation resulting from the intervention of the great powers, transforming structural asymmetry into political permanence. In the world of the 1953 armistice, each half of the Korean Peninsula had its own state apparatus, ideology, alliance, and national narrative of legitimation. Kim Hak-joon's study (2006) is particularly insightful in this regard, as the logic of the political systems both regimes constructed held that a divided state should exist. The Juche ideology of the Pyongyang regime, as well as the anti-communist development nationalism of Seoul, derived much of its legitimacy from the existence and threat of the other Korea. Indeed, as Park shows in her 2019 work, the two nationalisms created a self-reproducing cycle in which reunification was not only diplomatically costly but also institutionally destabilising, as it would have challenged the very legitimacy on which both regimes were based. Weathersby's research, based on recently declassified Russian documents (1993, 1995), confirms that the Soviets' strategic intentions since 1945 were to secure a friendly buffer state in the north permanently, rather than to facilitate Korean self-determination or reunification. The Korean War was not only an attempt to resolve the Korean division by force; it was the very event that made resolution structurally impossible. A brief comparative note is instructive here. Germany, like Korea, was divided by great-power state-building after 1945 and sustained by competing alliance architectures. However, Germany reunified in 1990 when Soviet patronage collapsed. The Korean case has not followed the same trajectory, and this divergence supports the paper's core argument: unlike Germany, where pre-modern and colonial structures did not produce equivalent north–south asymmetries, the Korean division rests on layers of structural differentiation that predate the Cold War by centuries. The withdrawal of great-power patronage is a necessary but not sufficient condition for reunification when division is institutionally embedded this deeply.

A further aspect of institutionalised division that has not been sufficiently addressed in the existing literature relates to the growing divergence in the linguistic and cultural characteristics of the two Koreas. Since 1948, the two countries have developed different linguistic standards. In the case of the DPRK, the linguistic standard was established in Munhwa-ŏ, the so-called cultural language of Pyongyang, in which the vocabulary was purged of foreign words, primarily English, in favour of native Korean terms. In contrast, the linguistic standard in the ROK was established by the extensive borrowing of English words and the development of distinct phonological rules. This growing divergence between the two languages has become so great that linguists have identified problems of mutual comprehension between the populations of the two countries that would have been unimaginable in 1945 (Shin, 2006). Such divergence is not simply a matter of cultural difference; it reveals that institutionalised division has reached the most intimate level of their shared identity. The experience of North Korean defectors who have settled in the South indicates that even in the event of political unification, the social and cultural estrangement that has accumulated over seven decades would not dissolve. Chun (2022) documents how defectors routinely face linguistic alienation and social discrimination in the South, struggling to make themselves understood in everyday speech, misreading social registers, and being marked as outsiders by accent and vocabulary. This evidence is significant beyond the individual human stories it represents. If populations that were linguistically identical in 1945 now experience genuine mutual incomprehension, then division has become self-reinforcing at the most intimate layer of daily life. Political reunification, in this light, would not produce social reunification – it would expose a social fracture that seven decades of institutionalised separation have made structural.

Equally paradoxical is the way in which both Koreas vie with each other for the appropriation of a shared cultural heritage, a process that, rather than bringing these two countries closer together in a spirit of reconciliation, has become yet another arena in which each country seeks to establish its own inalienable national authenticity. The folk song “Arirang” was included in UNESCO’s Intangible Cultural Heritage of Humanity List in 2012 by the Republic of Korea and in 2014 by the Democratic People’s Republic of Korea (UNESCO, 2019; UNESCO, 2025). This refers to the dual inscription of the same heritage, with each nation laying claim to its own unique possession of it, and the struggle for possession of Korean heritage in the context of the performing art form known as “Pansori” (UNESCO, n.d.). The rise of the “Hallyu” phenomenon in the late 1990s has created a greater divide in the context of Korean culture, wherein the South Korean projection of culture through its cinema, music, and television drama has created a greater divide with the North Korean nation, which cannot compete with its southern counterpart (Bok-rae, 2015). What might appear to be cultural common ground has thus become yet another arena of competition – what could unite has, in practice, only deepened the divide. The building of great-power states thus provides us with the most complete solution to our research question, as division has been reproduced and sustained through the very frameworks, ideologies, cultural assertions, and incentives that both internal regimes and their external patrons have instilled in the fabric of the two Koreas.

7 Conclusion

This paper’s question, “How have historical and geographical factors contributed to the maintenance and development of the division between North and South Korea?”, has been addressed through a model of layered causality, grounded in primary-source evidence and corroborated by pre-eminent secondary sources. Historical geography organised the institutional landscape of Korea long before 1945, and functional asymmetries between a militarised continental north and an agrarian bureaucratic south can be detected as early as the Three Kingdoms period and are documented in both the Samguk sagi and the Annals of the Joseon Dynasty. Japanese colonialism saw these asymmetries develop into material realities, creating two quite distinct political economic geographies that were quite suddenly split apart in 1945, as starkly illustrated by USAMGIK Ordinance No. 19. Great-power state-building after 1945 formalised these differences in the form of opposed regimes, a fact explicitly confirmed in the 1950 Stalin correspondence, and this was finalised and militarised by the Korean War. The divergence in linguistic practices and competitive appropriation of common cultural heritage since then have only served to add further self-reinforcing levels to an already entrenched division.

The division has been maintained through the build-up of structural forces, each layer conditioning the next. Geography formed the institutional context; colonialism gave this a structural dimension; intervention by great powers institutionalised it in two forms that reinforce one another politically; and linguistic and cultural differences have subsequently made even the common foundations of Korean identity a site of contestation rather than reconciliation. The division of Korea is not merely a frozen Cold War politics awaiting resolution through a solution to its current frozen state. Rather, it is a politics that has been reproduced over centuries and which persists precisely because it is grounded in something far deeper than Cold War rivalries.

However, certain limitations need to be pointed out. First, the primary sources consulted are necessarily limited in their representation. The Annals present a view of royal rule rather than of peripheral activity, and the Stalin letters present a Soviet view of strategy rather than of Korean agency. Another limitation of the comparative history approach is the possibility of post hoc rationalisation. Matray (1981) has shown that the division of Korea along the 38th parallel was carried out in a highly contingent manner. Thus, structural preconditions are necessary, but not sufficient, and Korean agency can easily be obscured by the framework of great-power activity.

Several avenues for further investigation may also be taken from the present analysis. First, a more systematic investigation of primary sources in Korean, such as colonial administrative records and post-liberation political tracts in both zones, would provide a more robust foundation for the structural argument, though it would be difficult. Similarly, comparative studies that examine the Korean case in the context of other divided countries, such as Germany and Vietnam, would provide a more rigorous test of the causal hierarchy and clarify the conditions under which colonial structural asymmetry presages or fails to presage permanent political division. Further investigation could also clarify the extent to which linguistic convergence or divergence follows or counters the diplomatic trajectory in inter-Korean relations, as well as the mediability of the competitive logic of cultural heritage inscription. Lastly, the extent to which the survival of the North Korean regime continues to depend upon Chinese economic and political patronage remains a matter that deserves further analysis, where the experience of the collapse of the German Democratic Republic may shed further light upon the extent to which the withdrawal of patronage threatens a highly institutionalised political system, or whether the Korean case reflects a more entrenched configuration of division.

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ANALYSIS OF JAPAN'S DEBT

Can JGBs continue to sustain a rapidly ageing population?

Asia Pacific Research Circle

Sciences Po

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Abstract

This paper adopts a policy-oriented approach to examine how demographic ageing influences bond demand and the long-term sustainability of Japan’s debt. It first evaluates the various mechanisms underlying the ageing population's influence on the fiscal balance of the Japanese Budget and on the capacity for JGBs to be held domestically. Thus, it argues, based on macroeconomic insight, that Japanese public debt might become less sustainable as JGBs are increasingly held by foreigners. Drawing on theoretical frameworks and existing literature, it critically evaluates current and proposed policy responses’ effectiveness in addressing emerging structural risks. Expanding the scope beyond domestic dynamics, it also considers the growing role of foreign investors required to attract them amid declining national savings. This paper aims to answer the following: How does Japan’s ageing population impact the demand for government bonds and ultimately the sustainability of government debt?

Authors’ Note

We are grateful to APRC for the opportunity to present this work, and declare no further conflicts of interest.

1 Introduction

According to the International Monetary Fund's 2024 general government debt data, Japan ranks first at 236.66%, surpassing fellow developed countries such as the US, Canada, and France. Despite this enormous debt, the country still manages to avoid a massive economic crisis and ranks highly in terms of GDP. This phenomenon could be explained by the Bank of Japan's role and domestic demand. Chiefly, Japan’s debt is internalised, meaning the Japanese government borrows from the Bank of Japan, preventing a financial crisis that would arise if it were in debt to foreign banks. In addition, the Bank of Japan has been conducting quantitative easing to bring down long-term interest rates, keeping interest rates close to 0%.

However, in recent decades, Japan has encountered a new challenge – an ageing population. “In 2016, the elderly population (those 60 and older) constituted 26.7% of Japan's total population (Cabinet Office, 2016)”. This is placing a greater economic burden on the Japanese government in response to increased pension spending and the potential shrinkage of GDP due to a smaller labour force.

These issues connect to the bond market in Japan. Japanese Government Bonds (JGBs) are purchased using national savings, which derive from the population's savings. Yet, with lower savings following the demographic shift, domestic demand for JGBs will be lower. Thus, with the government struggling to find domestic buyers, it may have to shift its strategy by attracting foreign investors or offering higher interest rates, ultimately increasing yields. However, these options are risky, as they may lead to dependence on global markets and exacerbate Japan’s government debt.

This leads to our research question: How does Japan’s ageing population impact the demand for government bonds and ultimately the sustainability of government debt? Researching this question will allow us to directly observe the causal relationship between contemporary Japan’s demographic shift and ultimately Japan’s capability to manage government debt. It is important to evaluate Japan's actions to combat this issue.

This paper is written in the format of a policy paper. Thus, the paper will present theoretical economic frameworks to explain the impact of Japan’s ageing population on the equilibrium between expenditure and revenue. Additionally, we will conduct a literature review and consult prior research papers to identify Japan’s current activities regarding government bonds and the role of the Bank of Japan.

2 Background

Japan’s current fiscal situation must first be understood in light of its history. Initially, the post-war economic miracle enabled the nation to rebuild into a manufacturing powerhouse, leading to dramatic economic growth from the 1950s through the 1980s. During this time, Japan had one of the highest household saving rates among nations, and these savings fueled further economic growth through private investment and government bond issuance. In 1992, Japan’s gross government debt was 68% of its GDP.

Nevertheless, this economic boom came to an end with the burst of the asset price bubble in the early 1990s. Following this was a period of prolonged economic stagnation, deflation and stagnant wages, commonly termed the “Lost Decade”. Since the shock of the asset bubble, consumer behaviour has changed drastically. Firms and households spent and invested less and resorted to more economically conservative behaviours. This caused the already stagnant economy to weaken further.

During this period, Japan’s deficit slowly began to climb. While the deficit spending was intended only as a temporary measure to address Japan’s ailing economy, it soon became the norm. Gross debt climbed from 136% of GDP in 2000 to 200% in 2015. As of 2025, Japan’s debt-to-GDP ratio is at a whopping 230%, much higher than that of other developed nations. Even accounting for the government’s asset holdings, the nation’s net debt still stands at 122% of GDP, third highest in the OECD. As no true long-term plan to pay off the debt was created, beyond issuing new bonds to pay the interest on old ones, Japan became stuck in a debt balloon.

Here it is important to address the reason Japan had been able to avoid collapsing in on itself despite its massive debt: Japanese Government Bonds (JGBs). Historically, JGBs had been almost entirely absorbed by domestic investors, with foreign entities holding only a fraction of the market. This high domestic absorption rate had been possible thanks to Japan's high household savings rate and the risk-averse nature of domestic investors (especially post-1990s). While 95% of JGBs were held domestically in 2014, the figure is now down to 80%, reflecting a gradual shift in the investor base.

3 Disequilibrium between the Japanese government’s expenditure and revenue in response to the aging population

Fiscal sustainability refers to “the ability of a government to sustain its current spending, tax and other policies in the long run without threatening government solvency or defaulting on some of its liabilities or promised expenditures (UNESCWA). Thus, this section will mainly focus on the impact of Japan’s ageing population on the change in equilibrium between expenditure and revenue – expenditure increases while revenue decreases.

3.1 Increase in Japan’s social security spending

This brings us to an analysis of Japan’s increase in social security spending, which puts more burden on government expenditure. The FY2025 Budget, illustrated in Figure 1, presents the government’s main expenditures for a single year, and it is evident that social security accounts for a significant share (Highlights of the FY2025 Draft Budget, 2025). Of a total expenditure of 115.2 trillion yen, social security expenditures account for 33.2%, amounting to approximately 38.3 trillion yen. This includes pension, medical care, long-term care and welfare. While originally intended to be funded entirely by “mutual support” insurance systems, premiums are insufficient, and 42% of benefits are currently financed by public expenditures. Compared to 1990, when social security accounted for only 17.5%, it has almost doubled. Moreover, seniors aged 65 and older are estimated to account for 29.4 per cent of Japan's total population (Asahi Shinbun, 2025). This means that 29.4% of the Japanese population is retired and thus has no income and receives social security subsidies. The government's burden of social security spending will increase as the elderly population continues to grow. Just as Japan has been tackling this issue, it will pay for it with government bonds, pushing debt onto future generations. This poses a risk to the sustainability of Japan's debt and fiscal system.

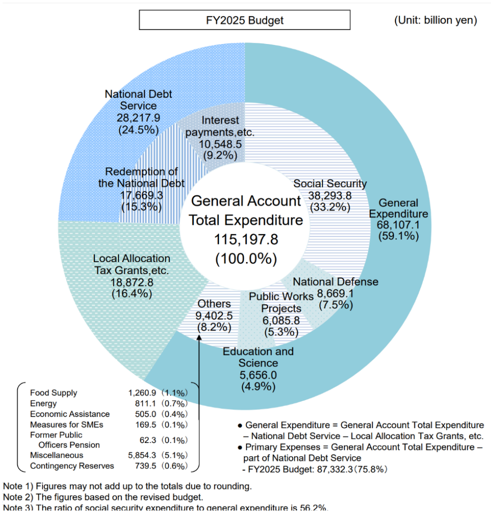


Figure 1: FY2025 Budget of Japan (Highlights of the FY2025 Draft Budget, 2025)

3.2 The life-cycle hypothesis by Modigliani

The life-cycle hypothesis by Modigliani helps to explain the issue of saving matters. This hypothesis shows how individuals save during working years and dissave during retirement. A larger retired population reduces national savings, thus requiring more government borrowing to finance pensions. Average labour income typically exhibits a marked hump pattern that peaks somewhat past age 50, falls thereafter, partly because of the incidence of retirement, and does not go to zero at any age. However, it falls sharply after 65 (Ando, Albert & Modigliani, 1963). While income falls after retirement, consumption, in contrast, remains relatively constant over time. Initially, individuals dissave when young as consumption exceeds income. During their working years, income exceeds consumption, resulting in an upward-sloping trend on a life-cycle graph. Consequently, after retirement, income ceases, and individuals begin to dissave by using their accumulated assets. Their wealth will then decline back toward zero. As such, this hypothesis's account of saving behaviour across different stages of life, especially after retirement, could be applied to the economic behaviour of Japan's ageing population. With less household savings, there is more burden on the government's spending.

3.3 Counterargument on the life-cycle hypothesis

However, this life-cycle hypothesis is too simplistic to argue that ageing mechanically reduces household saving and therefore JGB demand. The literature reveals that elderly households often do not decumulate wealth as quickly as the basic life-cycle model predicts because of precautionary saving, medical-expense risk, longevity risk, housing wealth, and bequest motives. Research by Ventura and Horioka (2020) on "The wealth decumulation behaviour of the retired elderly in Italy: the importance of bequest motives and precautionary saving" provides an alternative perspective on the elderly's spending behaviours. In the case study in Italy, the results show that, on average, the wealth decumulation rates of the retired elderly are much slower than expected. "40 per cent of the retired elderly in Italy are continuing to accumulate wealth, and more than 80 per cent are doing positive amounts of saving". This saving behaviour is often due to bequests and intergenerational transfers. This idea could be applied to Japan's case as well; if elderly Japanese households continue to hold assets or save positively, then ageing does not automatically imply a collapse in domestic JGB demand. Thus, this introduces a new perspective in which wealth and assets play a substantial role – not just income.

3.4 Policy Evaluation (Limitations included)

There were several policies and recommendations proposed by Goshi Aoki in "Fiscal Dynamics in Japan under Demographic Pressure" in 2026. He recommends three policies to be implemented simultaneously to alleviate Japan's economic risks amid demographic shifts: short-term relief measures, cost containment and productivity growth, and, finally, per-capita cost containment.

Beginning with short-term relief, this solution suggests continuously increasing the expansionary budget each year to increase spending on social security. In fiscal 2026, it will exceed 120 trillion yen. This approach focuses on responding to imminent risks, such as allocating more of the government budget to provide services for the growing ageing population. However, this is merely a relief tactic and will not be realistic in the long term, or would need to be complemented by other strategies.

Next is cost containment and productivity growth. Aoki suggests several potential solutions to address the ageing population and the shrinking workforce that accompany Japan's debt dynamics. Firstly, he looks into the productivity growth sector, which is a revenue-side policy. Increasing productivity would lead to GDP growth, which would accelerate the rate of tax revenue growth. In 2050, the moderate productivity scenario reduces the deficit by 17.9% and net debt by 2.7% relative to baseline. Figure 2 demonstrates that productivity improvements in GDP and revenue will quickly bend the deficit trajectory within a few years of implementation. The deficit has been decreasing over time, and if the trend continues, net debt will also shrink.

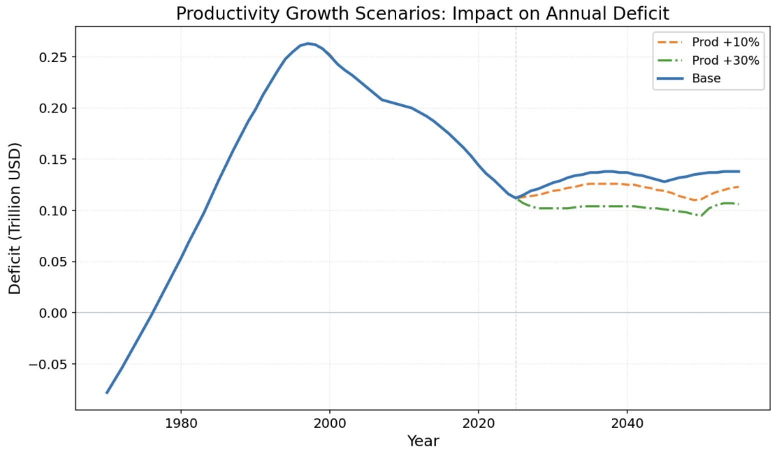


Figure 2: Productivity scenarios: baseline vs. +10% and +30% productivity by 2050 (Aoki, 2026)

Lastly, Aoki recommends the "per-capita cost containment" policy. It aims to cap or limit per-person pension or insurance costs. This directly reduces age-driven spending pressure and interrupts the pathway feeding debt compounding. In 2050, the moderate cap reduces the deficit by 77.4%.

The advantages of such policies, as mentioned, are that they provide much more practical insights for fiscal policy design. For instance, rather than responding to the issue, it tries to prevent it. For example, rather than continuing to increase the annual budget to accommodate more social security funds, this policy does the opposite, ultimately solving the deep-rooted societal economic issue. However, this policy also has limitations; it is a long-term structure whose effects will take time to show. In the meantime, there will be economic fluctuations and time needed for the population to adjust to the changes. Also, the model does not include political economy constraints that may limit how aggressively governments can cut costs in practice. This connects to the concept of clientelism in Japan, where the government may have to act in ways that the public may be dissatisfied with, but that are for the greater good of the market.

4 Demand for JGBs: understanding the downward pressure coming from the ageing population

Will the funding capacity of Japanese domestic actors be sufficient to sustain the debt and ensure it is held domestically? Will there be enough savings and willingness among Japanese households, non-financial corporations, banks, and the BoJ to buy JGBs to ensure that Japanese debt is held significantly domestically? These questions are of prime importance as the literature review shows that the sole parameter explaining Japan's debt sustainability is the so-called "national bias".

4.1 Literature review

In 2013, an IMF working paper by Lam and Tokuoka predicted that Japan would be unable to fund its debt by 2021 (Lam & Tokuoka, 2013). However, they failed to foresee the BoJ's high-interventionist policy capacity. Indeed, for 10 years, the BOJ has actively used quantitative easing via its Yield Curve Control (YCC) policy, keeping interest rates close to 0% and thus softening the weight of debt.

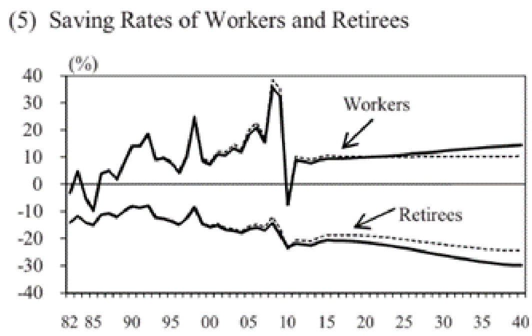
However, the threat remains and is even more pronounced following the BOJ's recent policy change since early 2024. The increased bond yields will significantly increase the debt burden; therefore, the breach of the debt threshold was recomputed to improve efficiency by Seah and Hui Shan for the AMRO (Seah, 2025, p. 75). Based on the methodology provided by Hoshi and Ito (Hoshi & Ito, 2012), they found that the debt/GDP ratio might, by 2033 or 2034, be higher than Japanese private financial assets. The primary objective of this data is to determine how long Japan’s domestic investor base can continue to finance public debt. This involves projecting the stock of private savings and defining the debt threshold as the point at which public debt exceeds that stock. Mechanically, breaching it will lead to foreign holdings of JGBs as well as financial market stress, thereby raising bond yield volatility. This debt threshold is based on the assumption that all Japanese actors will hold their savings in JGBs, which is actually not the case.

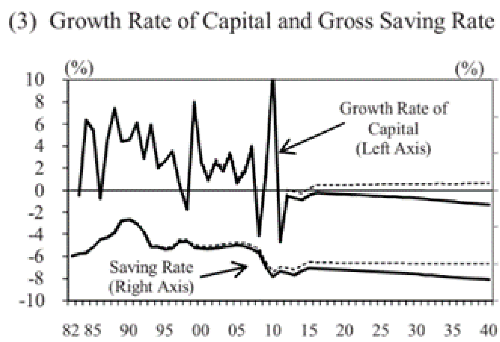
Beyond these models, through a theoretical thought experiment, we will examine how the Japanese ageing population significantly diminishes the demand for JGBs through different vectors: erosion of household savings under the life-cycle hypothesis, a strategic institutional shift endogenous to the ageing population, and the BoJ’s policy shift. We will try to assess the importance of each one of them. Lastly, we will map the current state of political awareness surrounding this issue and how to solve it.

4.2 Erosion of household savings

Horioka, updating data and his own observations done in “Why Is Japan’s Household Saving Rate So High?” (1989), highlighted in his paper “The (dis)saving behaviour of the aged in Japan” (Horioka, 2010, pp. 151–158) that the retired aged dissave importantly. He found that in 2000, a sharp turn was observed due to reductions in social security benefits, increases in consumption expenditures, and increases in taxes and social insurance premiums. Surprisingly enough, he argued that even older-age workers are in a dissaving process. Horioka asserted that the elderly's observed savings to bequeath to their children, which breach the zero wealth amount at death in the life-cycle hypothesis, are counterbalanced, to some extent, by their children saving less in anticipation of receiving a bequest from their parents (Horioka, 2010, p. 152).

For future trends in household saving rates, we have to dive into the Overlapping Generations model (OLG) developed by Muto, Oda, and Sudo for the Bank of Japan in 2012. It is one of the most complete models, using 80 age groups spanning 21 to 100, including firms, investments, the social security system, and the government, that successfully replicated the GNP path of past decades.



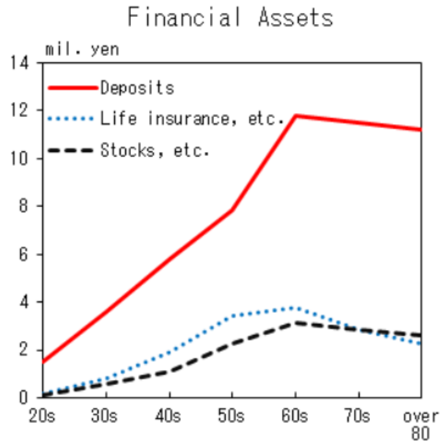


Figures 3 and 4: Muto, Oda, and Sudo 2012, p.44

On these two graphs representing their results, the dotted line shows the baseline scenario, holding the size of the age-21 population constant from 1995. The solid line shows their projection with an ageing population, as the size of the age-21 population diminishes under a fertility rate decline. Based on these results, domestic demand for JGBs will decrease, as households are the primary suppliers of pension funds and commercial banks.

However, can we be sure that this decrease in household savings is primarily driven by the ageing population? Historically, we see clearly a sharp diminution of household savings between the 1970s and 2024: After peaking at an extraordinary 23.2% in the mid-1970s, the household saving rate fell into the single digits in the early 2000s, reaching a mere 1.1% in 2024 and occasionally dipping into negative territory. (Horioka, 2024, p. 20)

Yet, between 1999 and 2014, the decline in household savings is due primarily to the decline in the saving rate of the elderly (86%), and the ageing population explain only 13%. (Horioka, 2024, p. 9) Thus, "the savings rate experiences a decline of approximately 0.2 percentage points for every 1 percentage point increase in the ageing rate". (Yu & Baharin, 2025, p. 19). This feature, identified by Unayama and Ohno (2017), shows that the saving rates of elderly households are due first and foremost to economic factors, such as declines in disposable income, particularly from pension benefits and property income. On the one hand, the decline in public pension benefits is due to reductions in benefit levels, the phasing out of cost-of-living increases, and the postponement of the pensionable age from 60 to 65. On the other hand, the decline in property income was, in turn, due to the prolonged "zero interest rate" policy of the Japanese government and the stagnation of equity and property prices (Unayama & Ohno, 2017). Thus, to maintain their consumption levels, retired elderly households have been forced to scale down their accumulated bank deposits and liquidate wealth. Even though literature shows that elderly households often do not decumulate wealth as quickly as the basic life-cycle model predicts, because of precautionary saving, medical-expense risk, longevity risk, housing wealth, and bequest motives (Niimi & Horioka, 2019, Part 1; Ventura&Horioka, 2020), the decumulation and dissaving patterns are still here.



This panel shows the asset balance per household by the head of household's age group.

(*(Research Lab)Demographic Trends and Household Savings and Investment*, n.d., Figure 3)

4.3 Strategic institutional shifts endogenous to the ageing population

According to the Flow of Funds Accounts (FFA) compiled by the Bank of Japan, insurance and pension reserves account for 25% of households' savings destinations. In Japan, the Government Pension Investment Fund (GPIF) is one of the largest holders of JGBs, at around 5.3% (Ministry of Finance, Japan, 2025). It is the largest single pension fund around the world. In 2025, it managed roughly 240 trillion yen (Government Pension Investment Fund, n.d.). His primary task is not to fund retirement pensions, which is done by workers' taxes, but rather to ensure that the Japanese government can meet its future pension obligations. However, as the population ages, workers' direct premiums are decreasing, while the need for pension funds is increasing as retirees become more numerous. Therefore, the Japanese government is forced to tap into the GPIF's security holdings. Consequently, it needs to achieve higher returns on its investments. That is why, in 2020, it underwent a radical shift to seek higher returns. Indeed, the fund reduced its target allocation for domestic bonds from 35% to 25% and increased its allocation to foreign bonds from 15% to 25% (Government Pension Investment Fund, 2020). It has also entered a payout-JGBs phase in this context.

We can also witness, on the side of life insurance, a tendency to withdraw and enter a decumulation phase. The ageing population also means a smaller working population, decreasing by about 1% per year. Therefore, premium inflows are decreasing. This is evident in the Industry data from 2024–2025, which shows that traditional life insurance penetration (premiums as a percentage of GDP) has fallen back to levels not seen in 35 years. Without sufficient premiums, insurers have no room to buy JGBs, which are further pressured by death benefit payouts and nursing care claims.

4.4 Policy normalisation: Linking the BoJ's policy to the ageing population

To our minds, for years, deflationary pressure was due to an ageing population and the resulting lack of consumption. Even if this situation was triggered by the asset bubble crisis in the 1990s, the perceived recovery is primarily due to an ageing population. This encourages the BoJ to keep interest rates near 0% through its YCC policy (Westelius, 2020). Indeed, as Hansen highlighted, "the most striking change since 2010, however, is the huge growth in the percentage of Japanese net government debt held by the BOJ. Prior to 2010, that percentage was never larger than 35.2 per cent; by 2020, that percentage was almost 70 per cent" (Hansen & İmrohoroğlu, 2023, p. 89). By targeting an interest rate close to 0%, the BoJ wanted to incentivise companies and households to borrow, thereby supporting economic activity.

However, the ageing population has reached a tipping point at which the BoJ can raise targeted interest rates and at which its goal of reflating the economy is no longer viable. This can be explained via different mechanisms. First, labour shortages are fixing an endogenous inflation. In 2026, the worker shortage is driving up wages. Indeed, the 2026 Shunto (Spring Wage Negotiations) tally by Rengo showed an average wage hike of 5.26%. The BoJ's January 2026 Outlook report confirms that service prices are rising at the fastest pace in three decades as companies have to pay more to retain employees. This is the third consecutive year of increases above 5%, reassuring the BoJ that inflation is driven internally rather than by external factors or shocks.

Secondly, Teikoku Databank's 2025/2026 Bankruptcy Reports show that corporate failures in 2025 exceeded 10,000 for the first time in over a decade. Under the creative-destruction process, a shortage of workers implies that companies must be more productive. Therefore, the less productive ones see their workforce diminishing, facing a labour-shortage bankruptcy. For the BoJ, raising interest rates will prevent these not-productive enough companies from keeping their less-productive workforce, as borrowing becomes harder.

Thirdly, due to zero interest rates, the Yen has experienced a sharp devaluation relative to its counterparts, especially against currencies in countries with high interest rates to tackle inflation (like the US). According to the report by the BoJ on "Review of monetary policy from a Broad Perspective", the US dollar to yen ratio has increased from 80 in 2010 to almost 160 in 2024. Therefore, due to a newly import-led economy, Japan saw its purchasing power diminish, consequently reducing its savings capacity (Xu, 2023, pp. 270–278). Moreover, because of this zero interest rate policy, but with an inflation at 2.5%, the Japanese were effectively losing, in 2024, 350 billion USD (Government of Japan, 2024, p.9) (*Highlights of the Outlook for Economic Activity and Prices(April 2024)*, n.d.).

Lastly, in 2008, the natural rate was rising. It can be defined as " the level of the real interest rate that is neutral to economic activity and prices in the sense that it is neither accommodative nor restrictive" *(BoJ Review). Developments in the Natural Rate of Interest and the Assessment of the Degree of (Monetary Accommodation*, n.d., p. 1). In the March 2026 review, the BoJ estimated it to range from -0.9 to +0.5 *(BoJ Review). Developments in the Natural Rate of Interest and the Assessment of the Degree of (Monetary Accommodation*, n.d., p. 3). "Japan's ageing and shrinking population could lower the natural rate of interest and, together with low inflation expectations, challenge the Bank of Japan's efforts to reflate the economy." "We find that demographic change has a significantly negative impact on the natural rate by lowering trend potential growth." (Han, 2019)

Overall, the situation at an interest rate of 0% was indeed managing Japanese debt, but without long-term benefits. Therefore, in 2024, the BoJ decided to progressively raise interest rates to 1% and diminish its buying power; thus, the BoJ's JGB holdings are projected to decrease by roughly 16–17% by March 2027 compared with June 2024 (Takata, 2026). The question, thus, remains: who is going to fill this gap?

This shift is clearly feared, and it carries risks. Indeed, the BoJ began reducing the amount of JGBs it bought by 400 billion yen per quarter (Seah, 2025, p. 63), but in January 2026, it softened the reduction to 200 billion yen per quarter. (Bank of Japan, 2026)

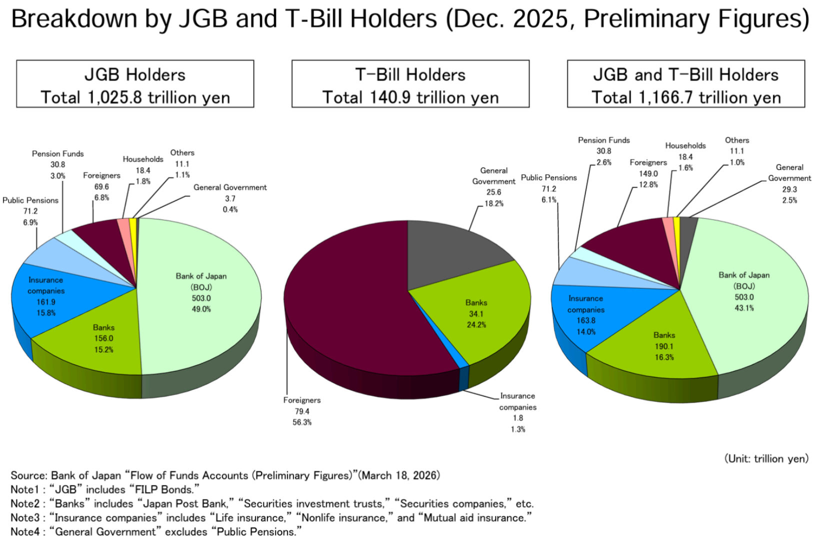


Figure 6: Ministry of Finance, 2026, https://www.mof.go.jp/english/policy/jgbs/

4.5 Evaluating the policies regarding demands for JGBs (Limitations included)

In this final subpart, we will shift our focus to Japanese politicians, Japanese institutions, and public opinion. Our aim is to map the actual state of awareness around diminishing domestic demand for JGBs and then the potential policies that can be implemented, as well as their downsides, to mitigate the trends we explained before.

Our mapping of politicians' awareness of this issue has not been conclusive, as neither the recent BoJ opinion papers nor the recent publication of the Ministry of Finance has highlighted any concern about a potential increase in foreign holdings of JGBs due to a decrease in domestic demand for them. The focus seems to be rather on economic growth. Indeed, in the "Basic Policy on Economic and Fiscal Management and Reform 2025" (issued in June 2025 by the MOF), economic growth is seen as an indirect way to fuel the lack of JGBs: "Wage increases are the cornerstone of the growth strategy" and

“Once the economy reaches this stage assuming the price stability target of 2% inflation is achieved, an economic scale of some 1,000 trillion yen nominal GDP would be within reach by around 2040. “ p 5. Moreover, to achieve this goal, Takaichi’s government is more inclined to boost it by increasing expenditure through the “Economic and Fiscal Plan for the New Stage”.

However, on the investors' side, the problem seems more pronounced, especially in super-long-term bonds. As the BoJ reduces its monthly purchases (tapering to roughly 2 trillion Yen per month by 2027), private institutions are demanding higher risk premiums.

Regarding the emerging and envisioned solutions, they are mostly technocratic and lack important breakthroughs. In the January 2026 Newsletter by The Ministry of Finance about JGBs, the government wants to expand the pool of potential JGB buyers with the January 2027 issue (December 2026 offering). According to this document, “the target for sales will be expanded to include non-profit organisations and similar entities (such as incorporated educational institutions and condominium management associations)” (Ministry of Finance, 2026, p.3). These new potential buyers will help to fill the gap left by the BoJ. Moreover, they hold massive amounts of cash in low-interest bank accounts. By allowing them to access JGBs, which currently offer a minimum guaranteed yield of 0,05% set by the MoF and are rising with market rates (2.4% for 10-year bonds in April 2026) (Nippon.com, 2026). One of the key advantages of these new actors is their long-term, stable capacity. Indeed, they are used to keep nearly 100% of their savings in standard bank deposits at a low interest rate. They have a practice of stability that might provide continuity for JGBs even during a crisis.

What capacity can condominium management associations have? According to the Ministry of Land, Infrastructure, Transport and Tourism (MLIT)’s survey, there are approximately 6.9 M in Japan. Every month, the average standard contribution is between 10,000 and 15,000 yen. Therefore, according to TechSciResearch (a consulting firm), the Japanese condominium and apartments market was valued at USD 73.08 billion in 2024 and is expected to reach USD 94.17 billion by 2030 (techsciresearch.com, 226). There are approximately 50,000 non-profit organisations, according to the Cabinet Office (CAO) of Japan.

However, this opening remains limited in scope, and the MoF is not sure this program will be attractive enough. Indeed, with an inflation rate between 2 and 3% in 2026, the 2.4% bond yield still represents a negative real return.

Moreover, and more importantly, this measure is counterbalanced by the New Nippon Individual Savings Account (NISA). Under the government's drive to promote growth, the objective is to reduce individuals' savings, giving them incentives to invest. The Nisa was launched in 2014, and a massive restructuring in 2024 made tax exemption permanent and significantly increased individual investment limits. (Nippon.com, 2023). Usually, Japan levies a tax of approximately 20.315% on capital gains and dividends; within NISA accounts, these profits are tax-exempt. The NISA has proved efficient, with approximately 26.5 million accounts registered at the end of 2025. But it is significantly reducing the amount of savings held by households that were previously kept in bank deposits and then used by banks to buy JGBs. (Statista, 2026)

To summarise, politicians’ awareness of debt sustainability might be more focused on reducing spending or increasing government income rather than on the potential lack of domestic demand for JGBs. The scope of the JGBs plus plan is very limited, and widening its scope even further seems unrealistic, as the New NISA (including individuals) offers greater profitability thanks to its global reach. Perhaps in the end, boosting economic growth is a good way to increase future savings, despite potential external shocks.

5 Debt Sustainability - Observing the impacts of foreign intervention

As domestic demand falls and the BoJ steps back with its involvement, the gradual shift in JGB ownership away from domestic actors has significant implications that may fundamentally undermine the sustainability of Japan’s massive debt. Domestic ownership of JGBs was the very mechanism that kept yields low and stable for so long, as domestic institutions such as banks, pension funds, and households held JGBs not purely for profit but also due to risk aversion and what Jones and Furukawa (2017) described as “home bias.” This meant that domestic actors were reliable, price-insensitive buyers who had a relatively inflexible demand for JGBs. Foreign investors, by contrast, have no cultural or institutional obligation and operate under more calculating terms, evaluating JGBs as they would any other investment.

This shift is critical. As the OECD notes, JGB yields have been suppressed and stable for so long precisely because of domestic investors’ risk aversion and home bias. However, as foreign investors come to hold a larger share of JGBs, this may impose a set of new rules and expectations on the market, as they are more likely to assess Japan’s fiscal trajectory in terms of yields.

The risk lies in what happens when yield expectations begin to shift. A rise in JGB yields triggered by foreign scepticism would create a negative feedback loop: higher yields increase the government’s interest payments and fiscal burden, further eroding investor confidence and pushing yields higher still. This cycle may have already begun: in 2025, Japan’s 30-year bond yield crossed a symbolic 4% threshold—implying a loss of investor confidence in Japan’s fiscal abilities.

With foreign actors, possessing none of the institutional loyalty that made domestic investors so stable, now holding a growing share of JGBs, it becomes clear that, along with a shift in market expectations and decline in confidence, a fiscal crisis is inevitable.

At the moment, there are no formal policies restricting foreign ownership of JGBs. However, policies such as the Foreign Exchange and Foreign Trade Act, while not targeting JGB ownership, impose screening mechanisms on foreign investors seeking to purchase significant equity stakes in domestic companies. Perhaps the Bank of Japan could impose a similar system, ensuring that bonds are held by reliable foreign parties and thereby increasing the stability of its sovereign debt market.

6 Conclusion

To conclude, Japan has been observed as an outlier, as its outstanding debt has not yet led to bankruptcy or crisis since the 1990s. One of the key arguments put forward explaining this paradox is that its debt is held domestically. However, we have shown that the ageing population might endanger this characteristic. Additionally, the transformation of the Bank of Japan's policies in recent years has raised concerns that Japan’s debt sustainability may be compromised.

On the one hand, we have seen that Japan needs more and more JGBs, while on the other hand, it is facing diminishing JGB demand from various domestic economic actors. While the Japanese government is increasingly pursuing the option of bringing in more foreign investors, it is crucial to adjust the extent of this intervention, as it may lead to global economic dependence and risk Japan's fiscal stability.

The policies envisioned by the government would mainly need to do the following: reduce government expenditures due to declining saving rates; broaden the potential scope of demand for JGBs to maintain its domestic character while remaining mindful of the implications of increased foreign investment in Japanese debt.

Most of the economic policies that we have evaluated are designed in a long-term structure. Therefore, while the policies are implemented, there will be short-term economic fluctuations in the business cycle, followed by the population’s need to adjust to the sudden change in their livelihood. As a result, the Japanese government must remain firm in its long-term objectives without being swayed by public discontent. To practically respond to this, it is necessary to provide a safety net for short-term fluctuations.

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Section

IV

Human Security

Two papers bring the symposium track to its most granular scale: the individuals and communities who fall between the systems described throughout – those trafficked through Cambodia's digital scam networks and those rendered stateless by borders drawn around the Sama-Bajau sea nomads — asking what protection looks like when institutions fail.

BEYOND BORDERS: ADDRESSING SAMA-BAJAU STATELESSNESS WITHOUT UNDERMINING MARITIME MOBILITY

Asia Pacific Research Circle

Sciences Po

Emily FAN, Mayuka HASHIMOTO, and Risa KOMORIYA

May 2026

Abstract

This paper examined how the vulnerabilities of statelessness among the Sama-Bajau sea nomads of maritime Southeast Asia could be addressed without undermining their maritime mobility. Using a qualitative policy-analysis approach, the paper evaluated existing national legislation, regional frameworks, and NGO programmes across Malaysia, Indonesia, and the Philippines, supplemented by interviews with academic experts and NGO practitioners. Existing frameworks were found to be insufficient to fully support the Sama-Bajau, as administrative systems designed around sedentary populations systematically exclude the Sama-Bajau from citizenship. Regional mechanisms lacked enforceable standards and measurable targets. The paper concluded that reducing documentation barriers, recognizing traditional fishing zones, preserving traditional lifestyles through mobile school systems, and expanding government-supported NGO programmes represent the most feasible immediate reforms, while structured trilateral cooperation and a long-term Schengen-style maritime mobility framework would more comprehensively protect Sama-Bajau rights across borders. Effective reform requires balancing state sovereignty with the preservation of maritime nomadic livelihoods and cultural identity.

Keywords: human trafficking, digitisation, scam centres, crime networks, social media, governmental action

Authors' Note

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Notable Remarks

First place prize winner, 23rd of April, Symposium

1 Introduction

“I had many ambitions… to become a policeman, a soldier, but I can’t because I don’t have documents,” says 20-year-old Sama-Bajau youth Bilkuin Jimi Salih, born in Sabah. “We want to have documents so that… our children won’t experience what we’ve been through” (Leong, Hussein, and Latiff, 2024). His experience reflects a broader structural issue affecting thousands across maritime Southeast Asia: the persistence of statelessness among sea nomadic populations.

The Sama-Bajau “sea nomads,” are an Indigenous maritime people traditionally living across the maritime zones of Malaysia, the Philippines, and Indonesia. Marine nomadism refers to a lifestyle where individuals do not align themselves with a fixed land-based territory but rather a single or multiple bodies of water, facilitating response to mobile maritime resources and the transport of goods (Bellina, 2021). Within this category, it is important to recognize the broad ethnic and cultural diversity of sea nomad groups. While these communities share historically mobile marine livelihoods, they exist on a spectrum of mobility ranging from fully boat-dwelling populations to partially or permanently settled coastal groups (Chou, 2003; Sopher, 1965).

However, as a result of nomadic lifestyle incompatibility with the constraints of modern state boundaries, the Sama-Bajau became progressively marginalized and impoverished (Bellina, 2021). At present, maritime ethnic groups have been relegated to the category of "otherness" by the culturally and politically dominant populations of the region, often excluded from domestic rights protections as a result of statelessness, and without a coherent framework of stateless protection under regional frameworks or clear pathways to citizenship (Bellina, 2021). Population figures also rely on academic estimates rather than standardized state data, with recent research suggesting a total population of approximately 1.1 million people across the region (Stacey et al., 2017). This reflects the difficulty of documenting highly mobile populations within territorially defined state systems.

Statelessness, referring to when an individual “is not considered as a national by any State under the operation of its law” (UN Conventions on Statelessness, 1954), severely restricts access to basic rights, as outlined by the Universal Declaration of Human Rights (UDHR) and related conventions, including education, healthcare, legal protection, and formal employment. At the same time, maritime nomadism challenges conventional assumptions underlying state sovereignty, which is typically exercised over a fixed territory and a legally defined population. As theorists such as Max Weber (in Politics as a Vocation) and James C. Scott (in Seeing Like a State) suggest, modern states depend on territorial control and administrative legibility, through fixed addresses and documentation, to govern populations. These theories suggest that Sama-Bajau statelessness emerges from the territorial and administrative assumptions built into modern citizenship regimes. Research on the Sama-Bajau in Malaysia and the Philippines confirm how documentation requirements, such as proof of residence or land ownership, have excluded mobile communities from legal recognition (Acciaioli et al, 2017; Ali, 2021).

Due to the Sama-Bajau’s dual Indigenous and stateless identities, they exist at an intersection of multiple regional and national policies that interact with each other to contribute to their marginalization within society. On one hand, the Sama-Bajau can be understood as an indigenous group whose cultural practices and collective rights to marine resources and mobility should be protected, as recognised under United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). On the other hand, the primary mechanism through which rights are granted in the modern international system—citizenship—depends on territorial belonging and administrative documentation. Thus, the Sama-Bajau occupy a position at the intersection of two partially incompatible systems: a global order organized around territorially bounded states, and a set of rights frameworks that inadequately account for mobile, transnational communities.

This incompatibility runs deeper than legal status. In an interview conducted for this study, Wengki Ariando, co-founder of the Sea Nomads Advocacy Group, observed that sea nomads are systematically excluded even from prevailing definitions of indigeneity, which remain anchored in land-based notions of territorial belonging. As he noted, dominant frameworks of Indigenous recognition, both global and national, are still built around the assumption that a people must be rooted to a fixed place, meaning that communities whose identity is organised around the sea rather than the land simply do not fit into the conversation. Compounding this, Ariando pointed to the way marine governance itself operates as an additional barrier. Marine conservation policies are designed with a focus on protecting fixed percentages of ocean territory, rather than accounting for the mobile livelihoods of communities for whom the sea is not simply territory but home. In this way, the Sama-Bajau are excluded not only by citizenship regimes designed for sedentary populations, but also by the very environmental and Indigenous frameworks that might otherwise offer them protection.

2 Literature Review / Theoretical Framework

2.1 Literature Review

Existing literature on the Sama-Bajau and other maritime nomadic groups largely focuses on the challenges faced by these groups, such as restricted access to education, healthcare, and legal recognition. Anthropological work by Chou (2003) and Sopher (1965) provides foundational accounts of Sama-Bajau maritime lifeways and mobility, while more recent interdisciplinary studies by Stacey et al. (2017) examine livelihoods, identity, and social wellbeing within contemporary Southeast Asian fisheries. From a legal and policy perspective, Sperfeldt (2021) examines structural exclusion through regional frameworks of legal identity and citizenship in Southeast Asia. While these studies show the severity of vulnerability, what is less examined is whether citizenship-based solutions can be implemented without undermining maritime mobility, which is central to Sama-Bajau life.

Indigenous-rights scholarship demonstrates cultural continuity and traditional livelihoods, as reflected in the UNDRIP. Studies of other maritime nomadic groups, such as the Moken divided by the Thailand–Myanmar border (Cheva-Isarakul & Sperfeldt, 2023) and the Bede in Bangladesh (Maksud & Rasul, n.d.), show how statelessness is produced when administrative systems fail to recognize mobile ways of life. The Thai government's post-tsunami policies toward the Moken further demonstrate that legal recognition can be provided while allowing traditional fishing practices and culturally specific education to continue (Cheva-Isarakul and

Sperfeldt 2023). These cases show that mobility and citizenship are not necessarily incompatible if policy design takes cultural practices into account.

Existing literature has largely focused on the causes and impacts of Sama-Bajau statelessness, but there remains limited research evaluating the effectiveness of contemporary state administrative policies in addressing these challenges. In particular, there is a lack of analysis of how citizenship procedures, documentation requirements, and regional cooperation frameworks can be adapted to accommodate maritime nomadic populations without undermining state sovereignty. This paper therefore evaluates whether current citizenship procedures and regional efforts reduce statelessness while still allowing Sama-Bajau communities to maintain maritime mobility, proposing that policies facilitating access to citizenship through simplified administrative procedures, reduced documentation barriers, and NGO-supported legal access programmes will more effectively reduce vulnerability while enabling the continuation of maritime nomadic livelihoods.

3 Methodology

This paper adopts a qualitative policy-analysis approach evaluating existing state and regional policies affecting the statelessness of Sama-Bajau communities across Malaysia, Indonesia, and the Philippines, focusing on contemporary policies from the last 15 years.

Primary research consists of documentary analysis of state legislation and administrative guidelines relating to citizenship and the rights of mobile and indigenous populations, alongside policy statements released by ASEAN and trilateral initiatives. Complementing this, interviews with academic experts and NGO practitioners provide insight into practical barriers to citizenship, cultural considerations, implementation challenges, and feasibility of potential policy reforms. Secondary research includes academic literature and reports from organizations such as UNHCR and UNICEF, supplemented by NGO materials and media coverage.

Policies and proposed reforms are evaluated according to human-rights impact, compatibility with maritime nomadism, feasibility within state sovereignty, and practicality of implementation. Data will be analyzed thematically to identify recurring barriers, policy gaps, and feasible solutions.

The limitations of this study include the lack of direct access to Sama-Bajau communities, limited access to policymakers, and the risk that NGO perspectives may reflect advocacy positions. Secondary sources and media reports may also focus on high-profile cases rather than typical experiences. Despite these limitations, the combination of documentary analysis, interviews, and secondary literature provides a strong foundation for evaluating existing policies and proposing feasible reforms.

4 Analysis and Findings

4.1 Administrative and documentation barriers

Securing legal identity is the most immediate prerequisite for accessing the rights guaranteed under the UDHR, including education, healthcare, safe employment, and other social services. As one Sama Bajau informant told the UNHCR, “when we get a birth certificate, we will feel more respected and be able to live life with dignity. I will feel valued as a citizen" (UNHCR, 2019b). This section will review the current mechanisms in place in the three countries of Sama-Bajau interest in their citizenship and naturalisation processes.

4.1.1 Philippines

The Philippines has a robust statelessness framework, as the only country of the three to ratify both landmark United Nations treaties that define who stateless persons are and obligate countries to prevent and reduce statelessness: the Status of Stateless Persons 1954 and the 1961 Convention on the Reduction of Statelessness, alongside its 2017 National Action Plan to End Statelessness, a government roadmap setting out concrete steps to identify and resolve statelessness domestically (Sperfeldt, 2021). Alongside these formal legal commitments to ending statelessness, the Sama-Bajau are officially recognized under the Indigenous Peoples' Rights Act as an Indigenous group at heightened statelessness risk, especially in the southernmost province of Tawi-Tawi (BARMM authorities, UNHCR, and JIPS, 2021) providing legally backed rights such as the rights to self-determination and the management of resources in traditionally inherited territories (Republic Act No. 8371), and benefit from targeted integration efforts. This includes the Bongao Birth Registration Assistance Program (BBRAP), which deploys mobile units to overcome financial and logistical barriers to birth registration, and has achieved over 30,000 registrations since its launch (BARMM authorities, UNHCR, and JIPS, 2021). Additionally, the country has received support from UNHCR Birth registration initiatives, supporting 998 individuals to register in 2022.

Further, in 2022, the Supreme Court introduced the Rule on Facilitated Naturalization of Refugees and Stateless Persons (A.M. No. 21-07-22-SC), developed pursuant to the 2017 Inter-Agency Agreement on the Protection of Asylum Seekers, Refugees, and Stateless Persons in the Philippines. The procedures aim to simplify the legal, procedural, and financial barriers to naturalisation, shortening naturalisation decisions from years to 90 days. Included in Section 9 and reiterated in Section 20, the inability to produce certain documents should not be grounds for rejection. The rule also reduces financial barriers: Section 27 halves the prescribed docket and legal fees, while Section 12 permits electronic publication, lowering associated administrative costs.

4.1.2 Indonesia

Indonesia has fewer protections for stateless Sama-Bajau as no dedicated legal status exists for stateless persons, often treating them as irregular migrants under immigration laws, and no specific pathway exists for Sama-Bajau based on indigenous status or long-term presence (Nationality for All, 2024). However, Law No. 12/2006 on Citizenship includes anti-statelessness measures, such as jus soli, or the right of anyone born in the territory of the state to citizenship, for children born in Indonesia to stateless or unknown parents (Article 4(e)), and ad hoc presidential naturalisations have resolved some cases.

The 2006 reforms eliminated prior gender biases in nationality transmission and strengthened birthright citizenship provisions for children born to non-citizens in Indonesia. However, the absence of specific procedures and guidelines to ensure the effective implementation of these provisions has resulted in difficulties regarding verification and documentation, resulting in as many as 50 million people at risk of statelessness (Nationality for All, 2024). Further, naturalisation requires 5 continuous or 10 cumulative years of documented residence, Indonesian proficiency, financial stability, and prior nationality renunciation, creating barriers for Sama-Bajau who lack initial immigration papers or address proof (Law of the Republic of Indonesia No. 12 on Citizenship of the Republic of Indonesia).

Some local-level adaptations have shown promise, such as in the Wakatobi Regency in Southeast Sulawesi, authorities have reclassified constructed reef structures as legally valid land plots, enabling Sama-Bajau residents to obtain land certificates that satisfy residence documentation requirements for citizenship purposes. This initiative illustrates that creative administrative adaptation can partially bridge the gap between land-based citizenship logic and maritime realities.

4.1.3 Malaysia

Malaysia presents the most restrictive environment of the three states. Malaysia similarly lacks a concrete mechanism to support stateless people, with no dedicated legal status or protection framework for stateless persons; under the Immigration Act 1959/63 they are generally treated in the same category as other undocumented or 'illegal' immigrants. There is additionally no specific legal route that grants Bajau-Laut citizenship or permanent residence on the basis of their long-term presence or indigenous identity; many are treated as undocumented or foreign (often associated with the Philippines), and thus subjected to standard immigration enforcement rather than indigenous protections (Acciaioli et al.).

The Federal Constitution's Second Schedule Part II s.1(e) grants citizenship to anyone born in Malaysia who is not a citizen of any country, yet practical interpretation, including a one-year lookback for foreign citizenship, often excludes stateless children. Additionally, the Births and Deaths Registration Act 1957 mandates birth certificates for all Malaysian-born children regardless of parental status, but without parental citizenship documentation, children frequently cannot prove eligibility and become effectively stateless. Additionally, late registration procedures in Sabah of registration of birth after forty-two days of birth incur additional fees and need to be applied for, with the endorsement certificate issued under the discretion of the judges of Sabah (Chong, Benedict, and Baltazar, 2023). Further, the nomadic nature of the Sama-Bajau means naturalization processes requiring proof of 10 years of documented lawful residence, intention to reside permanently, and Malay language proficiency (Constitution of Malaysia, Article 16) are difficult to achieve given their nomadic lifestyle.

The political environment in Malaysia has compounded these legal barriers. Nativist and xenophobic attitudes toward the Sama-Bajau, reinforced by media framings that characterize them as a security threat or as undocumented Filipino migrants, have directly obstructed even modest administrative reforms (Chong, Benedict, and Baltazar, 2023). The proposed Sabah Temporary Pass and Foreigner Identity Card, which would have provided a limited form of documentation to long-term stateless residents, were both abandoned following public backlash (Sabah's Migrant Card Too Lenient: Warisan). This political dynamic means that reform in Malaysia requires not only legal and administrative change but active work to shift public and political narratives around the Sama-Bajau.

However, rather than remaining passive in the face of these setbacks, Sama-Bajau communities and their allies have increasingly organized to demand change. Following the forced demolition and burning of over 273 Sama-Bajau stilt homes across seven islands in Semporna in June 2024, a coalition of over 125 civil society organizations called on authorities to halt further evictions and urged the Home Ministry to establish a special committee on statelessness Malay Mail (Soo, 2024). Sama-Bajau students, some of them children, participated in a peaceful demonstration outside the Sabah Chief Minister's office, and were subsequently detained for seven days on immigration ("Stop Crackdown on Bajau Laut People, 2024"). These responses reveal that the barrier to reform is not a lack of community demand but a political environment that has consistently failed, and at times actively moved to suppress that demand.

4.1.4 Policy directions

Sperfeldt (2021) identifies the reduction of bureaucratic barriers and the development of concrete statelessness procedures as priorities across the region, particularly in Malaysia and Indonesia. The development of trilateral efforts would aid the establishment of frameworks similar to that of the Philippines fast-track naturalisation and mobile registration, and creative solutions such as Indonesia's Wakatobi land certificates. Particularly in Malaysia, xenophobic attitudes and media portrayals of Sama-Bajau as security threats must be addressed (Chong, Benedict, and Baltazar, 2023).

A core obstacle is the lack of understanding about documents' importance, fueling fear and avoidance of authorities. As Philippine Sama-Bajau informant "Wanita" told UNHCR, "We didn't have the confidence to go to government offices. We don't know what to do. We are afraid that we'll be discriminated against because we are Bajaus." In the Philippines, 67% lack birth certificates while only 10% own housing land due to titling unawareness (BARMM authorities, UNHCR, and JIPS, 2021), requiring hyper-localised outreach that current efforts have yet to fully scale. It is important to note that the nationality solution to statelessness might be reductive of their history and cultural identity if not complemented by indigenous peoples rights recognition, particularly for mobile indigenous peoples whose homelands are divided by international borders.

4.2 Preserving traditional lifestyles

Maritime mobility plays a central role in the livelihoods of many Sama-Bajau communities, particularly through fishing practices and seasonal movement patterns. However, these practices vary significantly in access locations and have changed over time in response to state policies. Rather than treating maritime nomadism as a fixed traditional lifestyle, this section examines how mobility functions as a practical condition for accessing marine resources and sustaining community networks, and how recent policy interventions have reshaped these practices.

4.2.1 Fishing access and conservation regulation

One such example is the Wakatobi Regency in Southeast Sulawesi Province, which is the location with the largest population of Sama-Bajau. Currently, the Sama-Bajay carries out various marine activities (pongko) to support their livelihoods, such as collecting sea animals, spearfishing, or catching fish with large nets (Ariando, Arunotai & Thabchumpon, 2025). Their livelihood depends entirely on the pongko in their traditional fishing grounds (pamaniaa), but since their traditional houseboats (soppe) are no longer there, the Sama-Bajau build temporary stilt houses for sleeping and to keep their belongings. These temporary shelters have recently been declared a threat to biodiversity, and due to new security regulations, Sama-Bajau are no longer permitted to bring their families to stay in babaroh (Ariando, Arunotai & Thabchumpon, 2025).

As traditional practices such as fishing and gathering are often viewed as threats to ecological balance, biodiversity conservation effects can inadvertently marginalise these groups and then put them at odds with state centric conservation efforts. This generates a policy tension. Although coastal communities such as the Sama Bajau are often the ones most affected by climate change and biodiversity depreciation, a top-down approach of addressing these problems fails to consider the nuances of communities experiencing the effects of climate change on a day to day basis (Ariando, Arunotai & Thabchumpon, 2025).

4.2.2 Coastal development and settlement restrictions

Beyond biodiversity conservation regimes, state-led economic development initiatives further restrict Sama-Bajau access to marine resources, reflecting a broader prioritization of commercial use over mobility-based livelihoods. Competition with commercial fisheries and government-supported marine development projects frequently produces tensions and disputes between stakeholders (Ariando, Arunotai & Thabchumpon, 2025). For example, the establishment of marine protected areas such as Wakatobi National Park in Southeast Sulawesi introduced zoning regimes that restricted access to traditional fishing grounds while limiting Bajau participation in governance structures (Clifton, 2003).

Sama-Bajau resist the implementation of these new structures, however, this resistance is grounded in community values rather than indifference to conservation: Sama-Bajau villagers articulate a discourse of rights, justice, and moral economy, and research shows they continue to access resources not out of disregard for ecology but because they consider their traditional practices to be legitimate and just (Lynch & Turner, 2021).

4.2.3 Generational change and livelihood transition

Additionally, the privatization of coastal land and the expansion of tourism infrastructure in historically used coastal zones can restrict Sama-Bajau access to vital resources such as fuelwood and freshwater. In response to these constraints, younger generations of Sama-Bajau increasingly transition toward land-based settlement rather than mobility-dependent livelihoods. However, this transition is uneven and often associated with new forms of economic vulnerability, particularly in contexts where access to formal employment, education, and legal documentation remains limited (Ariando, Arunotai & Thabchumpon, 2025).

It is important not to read this transition as straightforwardly negative or as a failure to preserve culture. Evidence suggests that Sama-Bajau communities hold diverse and sometimes divergent views on settlement and mobility. Some families actively pursue land-based settlement as a pragmatic strategy to access education and services, particularly for children, as the earlier example of Wanita Arajani illustrates (Gluck, 2019). Others resist displacement and assert rights to continue maritime livelihoods. Policy that treats mobility preservation as universally desirable risks imposing an externally constructed vision of Sama-Bajau identity onto communities whose own preferences are varied and context-dependent (Ariando, Arunotai & Thabchumpon, 2025).

4.2.4 Policy implications for sustaining mobility-dependent livelihoods

Restrictions on fishing access directly limit mobility-based livelihood practices. Without fishing access, nomadism becomes unsustainable. It is recommended that states formally recognize traditional Bajau fishing zones and encode this right within biodiversity conservation laws, with Sea Nomad communities included in the decision-making process and co-management frameworks incorporating Bajau ecological knowledge.

Structural pressures associated with restricted marine access, documentation barriers, and settlement-oriented state policies are driving transitions toward land-based livelihoods; in a few generations, the Sama-Bajau maritime community risks sharp decline. It is therefore recommended that states fund cultural transmission support systems, such as boat building workshops, maritime apprenticeships, and community schools to conserve Bajau heritage and identity.

4.3 Gaps in regional frameworks and NGO programmes

4.3.1 Community-led initiatives

In the education sector, undocumented and non-citizen children are unable to register for public schools and must rely on informal education through alternative or community learning centers. For example, Iskul on Omadal Island in Malaysia and Indigenous Children's Learning Centers in Tawi-Tawi, Philippines and Sabah, Malaysia have provided basic literacy and holistic education for the Sama-Bajau children. These programs are able to adapt to the semi-nomadic lifestyle and linguistic diversity of the Sama-Bajau, yet they face challenges in delivering consistent education. Due to resource constraints, many programs cannot accommodate all children, allowing only the eldest child to attend with the hope that they will teach younger siblings (Loganathan et al., 2022). As a result, the Sama-Bajau community's educational needs remain largely unmet.

Human rights advocacy organizations also play an important role in protecting the marginalized Sama-Bajau communities. For instance, Borneo Komrad—which also provides alternative learning centers for stateless children across Sabah on their 3 floating schools—and activists like Yap Xiang have drawn attention to injustices, including the evictions and destruction of Sama-Bajau homes in 2024, triggering public debate on social media (Loh, Ali, and Somiah, 2024). However, as Shakila Wan from Borneo Komrad highlighted in an interview conducted for this study, the "illegal" nature of these schools and threats from the government, makes it difficult to receive donors, limiting their ability to protect the community and push for a change. Moreover, while these community-led initiatives provide essential educational support and raise awareness about statelessness, they play only a limited role in addressing underlying structural issues such as legal documentation and citizenship recognition.

4.3.2 International organizations

On the other hand, international organizations such as UNHCR have worked with government authorities and NGOs to issue documentation to Sama-Bajau individuals. According to the UNHCR Philippines, the UNHCR-UNICEF Joint Strategy for Addressing Childhood Statelessness has helped over 4,000 individuals with documentation in areas that experience recurring conflict and cyclical displacement since 2019 as of 2024. This includes 1,377 children in Maguindanao, Basilan, Sulu, and Tawi-Tawi in 2023 alone (UNHCR Philippines, 2024). This initiative has been largely successful in granting legal recognition to Sama-Bajau children and families, enabling them to access education and other public services.

4.3.3 Trilateral cooperation between Malaysia, Indonesia, and the Philippines

At the regional level, ASEAN has established human rights frameworks, most notably the ASEAN Human Rights Declaration (AHRD). The AHRD emphasizes the universality of human rights and encourages member states to cooperate "with one another as well as with relevant national, regional and international institutions/organisations" (ASEAN, 2012). However, it does not explicitly recognize indigenous peoples, even though all ASEAN states have endorsed Article 18 of the UNDRIP, which affirms that "every person has the right to a nationality as prescribed by law" (United Nations, 2007). As a political declaration, the AHRD imposes no legal obligation on member states to protect stateless populations, and ASEAN's principle of non-interference in domestic affairs further limits consistent enforcement. ASEAN also lacks an official definition of "stateless person" or "statelessness," leaving the interpretation of these terms to each member state (Suwalak, Noichim, and Kanthawee, 2025). Therefore, while ASEAN frameworks provide a foundation for coordination across countries, their lack of enforceable mechanisms and clear definitions limits their capacity to ensure region-wide protection for stateless populations.

Similarly, the Human Rights Commission of Malaysia (SUHAKAM), the Indonesia National Commission on Human Rights (Komnas HAM), and the Commission on the Human Rights of the Philippines (CHRP) signed the Memorandum of Understanding (MoU) on Finding Durable Solutions to the Statelessness Issues in Sabah (SUHAKAM, 2023). Since 2019, these parties have conducted meetings with the Chief Minister of Sabah and relevant government agencies, issued a joint statement, organized an online dialogue on statelessness, and visited a displaced persons center. However, there are no publicly available reports or updates detailing what actions have been taken or what results have been achieved. The MoU's goals also remain vague, stating only the aim to improve the situation for stateless persons and, if possible, to find durable solutions. This makes it difficult to evaluate the effectiveness of these efforts and to make sure that the parties are following through on their commitments.

4.3.4 Policy directions

This paper recommends that governments establish partnerships with NGOs already working with Sama-Bajau communities, such as Borneo Komrad and Iskul, while promoting trilateral cooperation among Indonesia, Malaysia, and the Philippines. NGOs can provide legal guidance and procedural support, educating communities about documentation requirements and increasing uptake. Governments should provide financial support and logistical assistance to community-based organizations, ensuring children and families have continuous access to education and other services.

Trilateral cooperation requires a more structured and transparent approach, with a concrete plan including specific timelines, measurable targets, and regular monitoring. The three human rights commissions should publish evaluations of their activities and coordinate standardized data collection, allowing statelessness cases to be systematically identified across national borders.

Following strengthened trilateral cooperation, a "Schengen-style" mobility framework — proposed by Henry Thomas, co-founder of the Sea Nomads Contact Group — warrants further exploration. Under this model, Sama-Bajau individuals could obtain citizenship in a single state while retaining the right to move freely across shared maritime zones, better safeguarding access to livelihoods and mobility while accommodating those who do not seek permanent land-based settlement.

4.4 Proposed policy evaluation

This section evaluates the feasibility and expected impact of the proposed policy recommendations based on three criteria: political feasibility within existing state sovereignty frameworks, practical constraints of implementation, and compatibility with UDHR-based rights protections, and alignment with UNDRIP principles on the preservation of maritime mobility and cultural practices.

4.4.1 Reduction of administrative and documentation barriers

Policies aimed at reducing bureaucratic barriers — relaxing document requirements, lowering financial costs, and simplifying application procedures — are the most immediately feasible category of reform. These operate within existing state sovereignty frameworks and can be implemented through administrative adjustments rather than legislative change. Logistically, costs are relatively low and implementation is relatively fast. Such reforms would significantly improve access to legal identity and rights protections in line with the UDHR. However, they remain grounded in sedentary assumptions about fixed residence, thus continuing to exclude mobile sea-dwelling groups.

A closely related measure is the formal reclassification of stateless Sama-Bajau as stateless persons rather than illegal migrants. In Malaysia and Indonesia, current categorisation exposes Sama-Bajau to criminalisation rather than protection. Introducing clear statelessness determination procedures would shift institutional responses towards rights protections. This is moderately feasible as it does not require territorial concessions but does require political will to resist nativist pressure.

Adaptive solutions such as Indonesia's Wakatobi land certification initiative illustrate moderate feasibility at a local level, operating within existing sovereignty frameworks. The primary limitation is scalability across the diverse legal environments of Sabah and Tawi-Tawi.

4.4.2 Preserving traditional lifestyles

Recognition of traditional fishing zones is moderately feasible within existing sovereignty frameworks. In Indonesia and the Philippines, existing legal mechanisms for community-managed marine areas provide entry points, while feasibility remains lower in Malaysia. These policies have a strong positive impact on maritime mobility, as continued access to marine resources is essential for sustaining sea-based livelihoods.

Cultural transmission policies are highly feasible within state sovereignty frameworks, as they do not challenge territorial control or citizenship regimes. They are relatively low-cost, scalable at local levels, and strongly compatible with maritime mobility and cultural practices.

4.4.3 Closing gaps in regional frameworks and NGO programmes

NGO-led initiatives are the most immediately implementable. Government–NGO collaboration is highly feasible in the short term, enabling NGOs to provide legal and educational assistance without challenging state authority. Mobile and flexible education programs are similarly feasible and directly respond to mobility, allowing children to access education without abandoning their traditional way of life.

Trilateral cooperation is more politically dependent but achievable given existing regional structures. A more structured approach could create a consistent cross-border response to statelessness. Accountability mechanisms such as monitoring systems and public reporting are the most sensitive but most important for long-term effectiveness.

A trilateral "Schengen-style" mobility framework would provide the strongest protection for nomadic mobility but is the least feasible in the short term, facing significant sovereignty constraints and the need for unprecedented regional integration. It should be considered a long-term aspirational goal.

Across all categories, the evaluation highlights a fundamental trade-off: policies most compatible with state sovereignty tend to provide only partial accommodation of maritime mobility, while those that would more significantly preserve nomadic lifestyles face greater political and logistical barriers.

Table 1: Proposed policy evaluation

		State perspective: Practicality of implementation		Sama-Bajau perspective: Rights impact	
Section	**Policy recommendation**	**State sovereignty (political feasibility)**	**Logistics (cost, time, complexity)**	**Rights protection (in alignment with the UDHR)**	**Preservation of mobility and culture (in alignment with the UNDRIP)**
1: Reducing bureaucratic barriers	Reduce documentation, financial, and procedural barriers	Moderate-strong - aligns with existing state systems; political resistance due to discrimination	Strong - low cost; relatively quick to implement	Strong - significantly improves access to citizenship and services	Weak - based on sedentary assumptions
	Legal stateless recognition; reform official speech	Moderate - no territorial concession; political resistance due to discrimination	Moderate - moderate cost; may require lengthy legal reform and institutional retraining	Strong - shifts from criminalisation to rights-based protection	Moderate - reduces harm
	Indigenous legal recognition	Moderate - contingent on state attitudes	Moderate - requires legal reform	Moderate-strong - provides access to indigenous rights frameworks	Strong - supports cultural preservation
	Adaptive land-based solutions (e.g Wakatobi reefs)	Moderate - aligns with existing state systems; stretches citizenship logic	Weak-moderate - low cost; challenging to scale	Moderate - where feasible improves access to citizenship and services	Strong - adapts system to maritime lifestyle
2: Preserving traditional lifestyles	Recognition of traditional fishing zones and co-management	Acceptable if framed as regulated co-management; aligns with conservation goals and does not weaken territorial control	Moderate cost; requires mapping traditional zones and coordination with fisheries agencies; medium implementation time; long-term solution if institutionalized	Supports right to livelihood and food security; strengthens indirect access to education and services through economic stability	Strongly supports continuation of maritime subsistence practices and ecological knowledge transmission
	Cultural transmission	Highly acceptable; does not challenge borders or citizenship frameworks and aligns with cultural protection policies	Low to moderate cost; can be implemented through NGO partnerships and local education programs; scalable and sustainable if community-led	Supports right to education and cultural participation; improves inclusion without requiring immediate legal status resolution	Directly strengthens intergenerational transfer of maritime skills, identity, and language while allowing flexible sea-based lifestyles
3: Closing gaps in regional frameworks and NGO programmes	Government–NGO Collaboration	Strong - acceptable; NGOs assist without reducing state control	Strong - low cost; quick to implement; sustainable if funded	Strong- supports right to nationality and education	Strong -allows Bajau lifestyle to continue
	Legal and Documentation Support	Strong - within domestic law; feasible politically	Moderate - low cost; fast; some legal complexity; long-term solution	Strong- strong support for nationality rights	Strong - supports mobile, sea-based lifestyle
	Mobile and Flexible Education Programs	Strong - does not challenge sovereignty	Moderate - moderate cost; medium implementation time; few legal barriers; sustainable	Strong - protects right to education	Strong - children can learn without leaving traditional lifestyle
	Structured Trilateral Cooperation	Weak - needs political will; feasible if states agree	Moderate - moderate cost; slow to formalize; durable once institutionalized	Strong - improves cross-border protection of nationality rights; aid national frameworks	Strong - Recognizes transboundary Bajau lifestyle
	Accountability, Monitoring & Data Sharing	Weak - politically sensitive; acceptable if states agree	Weak - moderate–high cost; requires technology/staff; long-lasting	Strong - ensures ongoing rights protection	N/A - Helps track if traditional lifestyle is preserved
	"Schengen-style" mobility framework	Weak - significant challenge to sovereignty norms	Weak - requires unprecedented regional integration; long-term implementation	Strong - maximises access to rights across borders	Strong - fully compatible with nomadic mobility

5 Discussion and Limitations

Future evaluation of these policies could focus on several key criteria to assess both the practical outcomes and the lived experiences of the Bajau sea nomad communities. As a preliminary step, it is necessary to collect more detailed census data on Sama-Bajau sea nomads, including current population statistics, to determine the scale at which each policy should be implemented and to establish a baseline for measuring future success. One important approach would be to conduct interviews with Bajau elders, who can provide insight into how the interventions have affected community life, cultural practices, and access to essential services. Assessing sustainability is also important, examining whether the programs and initiatives continue to operate effectively over time and whether they have been maintained by local communities or supported by governmental structures. Quantitative measures would include the number of Bajau sea nomads who have benefited from the policies, how many have been formally registered in state systems, and the extent to which statelessness has decreased within the population. Economic stability should also be evaluated, particularly whether securing access to traditional fishing grounds or other livelihood resources has improved income levels and reduced poverty among Bajau families. In addition, whether a concrete trilateral plan has been set and whether its targets have been met would indicate accountability, coordination, and long-term impact across Indonesia, Malaysia, and the Philippines. By combining qualitative insights from the community with measurable outcomes, such an evaluation would offer a comprehensive understanding of both the effectiveness and cultural relevance of the policies over time.

6 Conclusion

Statelessness among the Sama-Bajau sea nomads arises from structural tensions between territorially bound state sovereignty and a maritime, nomadic way of life. Existing national and regional frameworks remain insufficient, as they are primarily designed around sedentary populations and territorially fixed identities. Addressing these vulnerabilities requires coordinated national and regional reform that secures rights to nationality and preserves traditional ways of life, while providing governments with practical and sustainable mechanisms to protect a historically marginalized population.

At the national level, Malaysia and Indonesia should reduce bureaucratic barriers, implement concrete statelessness procedures, and address xenophobic media narratives. In the Philippines, successful initiatives such as fast-track naturalization and mobile registration should be scaled up. At the regional level, structured trilateral cooperation with clear timelines, measurable targets, and public reporting would strengthen accountability, with a "Schengen-style" mobility framework as a long-term aspirational goal. NGOs should be formally supported by governments to provide legal assistance and flexible education programs throughout.

Across all categories, policies most compatible with state sovereignty tend to only partially accommodate maritime mobility, while those that would most significantly preserve nomadic lifestyles face greater political barriers. A workable compromise must therefore be reached through negotiation that respects the rights, choices, and voices of Sama-Bajau individuals and communities.

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ALONG THE CAMBODIAN BORDER:

Impacts of Human Trafficking in Cambodia on International Relations and Regional Stability

Asia Pacific Research Circle

Sciences Po

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Abstract

This paper examines the emergence of digital scam centres in Cambodia as an evolving form of human trafficking shaped by digitisation, corruption, and weak institutional governance. While existing research has explored Cambodia's long history of human trafficking and administrative corruption, this paper investigates how such networks have adapted to the digital age through scam centres operating across both virtual and physical spaces. Using a victim-centred qualitative approach, the study prioritises survivor testimonies and regional perspectives alongside official reports to analyse the mechanisms sustaining trafficking networks in Southeast Asia, focusing on the Cambodian case study. The paper establishes the operation, mechanisms, and impact of digital scam centres in Cambodia. It argues that scam centres should not be understood as new trafficking networks, but rather, embedded systems within pre-existing networks, representing a new modus operandi of forced criminality. The weaponisation of digital technologies also does not exist in a vacuum; instead, it is facilitated by weak government institutions. Consequently, trafficking networks have become increasingly scalable, resilient, and difficult for states to regulate without equally evolving state capacity. Ultimately, the paper demonstrates that scam centres also pose significant challenges to sovereignty, governance, and regional stability. This reflects the broader global consequences of digitisation.

Keywords: human trafficking, digitisation, scam centres, crime networks, social media, governmental action

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1 Introduction

1.1 Definitions

Human Trafficking: "The term "trafficking in persons" means the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of authority or of a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation includes, at a minimum, the exploitation of the prostitution of others or forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs" (United Nations, Palermo Protocol 2000).

Scam Centres in Cambodia: Scam centers in Cambodia are clandestine fraud operations, controlled by international and organized criminal networks specializing in online fraud and operating in Cambodia. Policy analysis by the Human Research Consultancy has characterized Cambodia as a global nexus and among the global epicenters of trafficking-linked transnational cyber-fraud, with scam networks recruiting coerced and voluntary workers from dozens of countries and targeting victims worldwide (Human Research Consultancy).

1.2 Context & Establishing the Human Trafficking Scene in Cambodia

1.2.1 Ineffective and Cruel Policing Practices

Human Trafficking in Cambodia, while operating in illegal criminal networks, have still been aided by governmental bodies that have been incompetent, corrupt and cruel. Within Cambodia, administrative systems alongside the police routinely fail in addressing human trafficking as a whole within Cambodian borders. When it comes to policing inefficiencies, the police in Cambodia are "tarnished by allegations of malpractice, corruption, and favoritism. Torture, forced confessions, and illegal arrests and detentions have been frequently reported by the media and human rights NGOs (Asian Legal Resource Centre, 2001)." These issues aren't just an ignorable side effect of proper policing, but an incredibly important piece of the puzzle in understanding how human trafficking has continued to flourish in the region. Many policing practices, alongside being corrupt and misused, have had flawed strategies while being very harsh yet ineffective when executed. Researchers at the University of Chicago discuss how, "Many Western NGOs who follow this [harsh] intervention strategy, most notably the International Justice Mission, boast sensationally of "brothel raids," in which agencies collaborate with police forces to shuttle sex workers out of brothels and into temporary shelters. Many of the women are frustrated with their detention in these shelters and immediately return to sex work (Haugen, 2005). However, when police do participate in "brothel raids," brothel owners are not typically charged with crimes and the sex workers are often left unprotected, with little or no rehabilitation services provided to them (US Department of State, 2009; Samarasinghe, 2008). Police often arrest the sex workers themselves and charge them with illegal prostitution, assuming–distinctly contrary to NGOs–all sex workers are voluntarily working in prostitution (Samarasinghe, 2008). The threat of arrest as a deterrent from work in prostitution is not only irrelevant if the sex worker has been forced into the job, but also misdirects the blame. Further, police harassment of the sex workers is common, and women often report to NGOs that police have beaten them or stolen their earnings. Police brutality is so widespread that sex workers cite police harassment as their primary fear, and not rape or violence within forced prostitution (Derks, 2008). This showcases a fatal flaw in the policing practices of Cambodian police that do more to harm the victims of human trafficking on a societal level when compared to any potential support they may or may not arbitrarily bring. Police are then shown to be continually ineffective at addressing this core issue, while even at times systemically exacerbating its effects.

1.2.2 Corrupt Administrative Systems

Alongside policing systems, the administrative systems of Cambodia have led to the proliferation of many of the facets of human trafficking across the board. Corruption is, at times, even more apparent in the administrative systems that deal with such criminal cases, with the incompetency and unjust practices going all the way to the top of these relevant criminal justice agencies. Researchers at SAG publications remarked on this, while writing that “Most of the interviewed Anti-Trafficking and Juvenile Protection Office officers confessed that they and their colleagues had very limited knowledge of human trafficking. Some had only attended a one-day training workshop on the subject. They blamed their poor performance on a lack of resources, training, and focus. Instead of spending time investigating potential trafficking incidents, they were told to cooperate with NGOs in raising public awareness about the dangers of illegal migration, prostitution, and human trafficking. Corruption was a major factor in the unfair application of the law, and legal ambiguities could also be used as opportunities for abuse of power. The convicted participants reported that if they had been able to pay the bribe requested by the police or the judiciary, they would not have been convicted or would have received a more lenient sentence.” Blatant corruption was then a cornerstone in cases of human trafficking, showing that there is categorically much more to the human trafficking prevalence in Cambodia that any simple narrative about unbeatable organized crime rings that ignores the governmental failures, over and over again.

1.2.3 Western Influence

Another root cause that is imperative to mention is the influence of much of the Western world (namely, the United States) on the development of human trafficking in Cambodia, with Western nations being complicit in enabling, and even helping to create the complex humanitarian emergency in the region. Researcher Susan Rosas at the University of Chicago discusses American and American ally influence in Cambodian history, while specifically focusing on UNTAC’s involvement in the creation of an environment conducive to sex work. She discusses how “the entry of the United Nations Transitional Authority in Cambodia (UNTAC) marked a boon for the sex industry: the supply of Western troops seeking services greatly increased demand (Widyono, 2008). The United Nations continually fails to include or consider women in the reconstruction of war-ravaged humanitarian sites.” There were also other international organizations, that, as a whole, even blame the Cambodian people that they claim to help while painting a narrative around Cambodia having a culture of violence and sexual assault (Springer, 2009). As mentioned earlier, NGO leaders and policing efforts from international organizations have even led to instances of victims being more afraid of NGO and intergovernmental officials than their own traffickers due to harsh and unfair policing practices, such as through large-scale brothel raids.

2 Literature Review on Digitisation and the Rise of Scam Centres

2.1 Historical Background of Human Trafficking in Cambodia

Cambodia's trafficking landscape is inseparable from its history, including the Khmer Rouge period, decades of civil war and their post-1990s reconstruction (UNODC, 2017). Human trafficking prevailed in the country under the form of sexual exploitation, labour trafficking, debt-bondage, child sexual exploitation and forced labour in a variety of sectors.

Human trafficking was abolished in Cambodia in 1897. Prior to that, there were two categories of slaves, which was Neahk near (hereditary slaves) and Khnhom (debt slaves), consisting of prisoners of war, criminals, tribesmen and their offspring. Sexual abuse was frowned upon as slaves were considered untouchables and anyone who had sex with them "were considered as having defiled themselves with savages" (Chenda, 2014).

In 1863, France made Cambodia a Protectorate. In 1885, the French were faced with an insurrection by Cambodians of all classes, which forced them to deploy about 4000 military personnel, in turn leading to an increased demand for prostitutes. Prostitution remained legal until the end of the French protectorate in 1953. Despite anti-prostitution laws imposed by King Sihanouk in 1961, the laws were relatively unsuccessful to the point that by 1963, the old regulations of prostitution were reinstated (Chenda, 2014).
The Khmer Rouge Regime, led by Pol Pot, committed many activities and offences which constituted "one of the largest genocide and international human rights violation of the last third of XX century", including forced labour, forced marriage, starvation, massacres and countless other crimes (Gilarowski, 2016).

After the totalitarian regime fell in 1979, the People's Republic of Kampuchea (PRK) attempted to abolish prostitution once again and sent sex workers to an island in Cambodia for rehabilitation, yet went unsuccessful (Chenda, 2014). With Vietnamese troops sent to assist Cambodia in the war against the Khmer Rouge, prostitution was believed to have been "organized for the benefit of the troops. In any case, war and the presence of foreign troops were once again a strong factor in the reemergence of conventional prostitution"; this may have reflected through an increase in the number of prostitutes in Phnom Penh at the time (Chenda, 2014).

This "modern-day slavery", results in a weakened institutional capacity, fragile legal structure and gaps in governance that trafficking networks continue to exploit, especially in rural areas and on online platforms where the legal system is unsupervised.

2.2 Constant Evolution in Human Trafficking

Many Cambodians were left vulnerable to exploitation and created opportunities for trafficking in persons, especially in those sectors that are not comprehensively regulated, such as rural areas and some parts of Phnom Penh (UNODC, 2017). In recent years, the centers constantly target job seekers or young people, with a recent rise in victims who are not Chinese and do not speak Mandarin, especially in borderline countries. The shift leads to a broader range of trafficked nationalities and an increasing focus on English-speaking downstream scamming targets.

Cambodia is situated in the heart of the Greater Mekong Subregion. The Mekong river infrastructures corridors, connecting neighboring countries and rural hinterlands to urban areas. In addition, Southeast Asia is positioned between major global economies such as China, India and the wider Indo-Pacific, becoming a region of transit and trading area. Perpetrators utilize these routes for illegal cross border movement and human trafficking networks, as borders are under-governed and labor migration within Southeast Asia intensified with many immigrants through informal settlements.

“The situation has reached the level of a humanitarian and human rights crisis,” said experts Tomoya Obokata, Siobhán Mullally and Vitit Muntarbhorn, stressing that thousands of released victims remained stranded on borders between Myanmar - Thailand in inhumane conditions. Thousands of trafficked individuals of various nationalities are forced to carry out fraud in the centers across Cambodia, and other Southeast Asian countries. These centers are linked to a criminal network that recruits victims globally, then puts the migrants into facilities in the aforementioned area. According to Special Rapporteurs, reporting to the UN Human Rights Council, victims are kidnapped and sold to other fraudulent operations, and are not freed until their families pay the ransom or if they try to escape, they are often tortured or killed (UN News, 2025).

2.3 The Operation

2.3.1 Organized networks

Cambodia hosts more than 50 scam centers, and the annual revenue from these operations exceeds $12.5 billion, equivalent to half the country’s formal GDP (CSIS, 2026). Originally operated by scattered and independent gangs after COVID-19, scamming activities work under large, consolidated, mafia-style criminal groups. These organizations are gaining power in Cambodia and are involved in numerous illegal industries, including drug trafficking and human trafficking.

They work under the guise of industrial and science or technology parks, often found in casinos, hotels or abandoned apartments. Starting in late 2020, empty casinos and adjacent infrastructure in Sihanoukville, Poipet, Bavel and Phnom Penh in Cambodia were rapidly converted into militarized scam centres. By mid-2021, a massive scamming industry had emerged there and was flourishing under multilayered state protection (USIP, 2024).

The fight against trafficking in the country is further complicated by its internal governance issues, which is the very issue Cambodia struggles with as law enforcement agencies and criminal networks often work in tandem to enable trafficking operations (Rasnake, 2025). According to the 2025 U.S. Trafficking in Persons (TIP) Report, senior Cambodian government officials and business elites are benefiting from scam operations, for example: Chen Zhi, a Chinese- Cambodian who served as an adviser to both current Prime Minister Hun Manet and former Prime Minister Hun Sen, as well as other senior Cambodian officials, was sanctioned by the U.S. Department of Treasury for “operating a transnational criminal empire through online investment” (CSIS, 2026).

Furthermore, foreign criminal groups have played a leading role in the expansion of these organizations, particularly those from China, associating with local groups in Cambodia and others within Southeast Asia. These organizations are reported to have paid tribute to local policing agencies, allowing organized crime to go unnoticed.

2.3.2 Social media trap

Digitisation is defined by the adoption of digital tools to create new or modify existing operations. The transition to the digital world started soon in these centers. Firstly appeared as gambling websites in COVID-19, after the pandemic, these organizations shifted to more sophisticated scams, with organized networks and utilization of social media, artificial intelligence, cryptocurrency and blockchain technology.

Social media is a frequently used platform of scam centers. According to Kaeli Rasnake in her report "Sex & Labor Trafficking in Cambodia", online scams are becoming a frequently utilized tactic by traffickers who take advantage of social media to recruit adults and children with the allurement of false employment. After the bait, the broker moves victims through airports, by land or sea to Cambodia. Once the victim is in Cambodia, the trafficker will begin to further entrap them into sex work or forced labor, in which the alternative is torture, rape, debt bondage or reselling to another network (Rasnake, 2025).

In his testimony, a South Korean survivor, referred to as Dex, recalled applying on Telegram, through an online post advertising "light job, high salary": 2.000 USD for "texter", up to 10.000 USD for "caller" and "investment specialist", higher than average income in South Korea. After reaching Cambodia, Dex found himself texting the pre-written text to strangers, with a goal of texting 100 people in his first two months, and luring potential "investors" to the network. He was working in an isolated department complex, with guards outside and robbed of his personal belongings and identification, which made escaping impossible (VnExpress, April 2026).

As numerous tactics were detected by government agencies, these organizations evolved to new scripts, oftentimes acting as government officials, assurance agency, or once-in-a-lifetime opportunities: all-inclusive hotel trip, data package for phone use, etc. These are fast and appealing to the victims. giving the perpetrators many fruitful opportunities.

2.3.3 Operational mechanism

Trafficking in person, as defined in United Nations Palermo Convention Against Transnational Organized Crime 2000, is the recruitment, transportation or transfer of person, by any means of threat, use or other form of coercion, of abduction or of a position of vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation (Art 3a). This is the common practice of the organizational hubs, conducted through "pig butchering" mechanisms.

"Pig butchering" refers to the idea of "fattening the pig before slaughter". It is a type of social engineering scam in which fraudsters establish fake relationships, often romantic or investment based, to manipulate victims into transferring large sums of cryptocurrency or fiat over time (Han & Button 2025). The victims, who were reached out through social platforms, were "fattened" with trust and attention from their "partner", who disappeared with their funds. Perpetrators use stolen photos, fake identities or increasingly, AI generated images and deepfakes to approach the victim, appearing trustworthy and emotionally invested in them. Eventually, the fraudster pitches a lucrative crypto investment opportunity - linked to a fake platform and coached the victim through the process of sending funds, encouraging them to invest more. When the victim tries to withdraw funds or stop sending more money, the scammer disappears alongside the funds, and the platform also becomes inaccessible.

3 Methodology

This study covers three main points: the root causes of human trafficking, the role of digitization in facilitating modern trafficking networks and its impact on Cambodia's international relations. To contextualize these developments, the research is conducted with an extensive literature review, adopting regional perspectives drawn from Southeast Asia to situate Cambodia within broader socio-economic and political systems influencing trafficking practices. A victim-centered approach guides the resources selection process, with priority given to testimonies, regional perspectives and official reports from organizations such as the United Nations. Nevertheless, the research acknowledges a potential bias as a result of a reliance on English-language sources, of which many originate from Western or Eurocentric institutions. Through the analysis of these documents, patterns of Cambodian trafficking were identified therefore developing qualitative insights into the structural mechanisms sustaining human trafficking and its consequences on the country. The study aims to contribute to a deeper understanding of contemporary digitised trafficking within its historical and systematic context, particularly in Cambodia.

4 Analysis and Findings

4.1 Scam Centres and the transformation of human trafficking networks

4.1.1 Integration with current human trafficking networks

Scam centres represent an evolution and intensification of pre-existing human networks in Southeast Asia, best understood as embedded within a broader transnational illicit ecosystem.

Southeast Asia's structural position between major global economies has historically facilitated high levels of cross-border mobility, trade and labour migration. Highlighted by the United Nations Office on Drugs and Crime (UNODC), the region functions as a hub for trafficking flows, creating an enabling environment where trafficking networks operate across jurisdictions, exploiting uneven regulatory frameworks and gaps in enforcement capacity (UNODC, 2024).

Economic liberalisation across Southeast Asia has intensified internal and cross-border migration, through informal recruitment systems. These systems lack oversight, exposing migrants to deceptive practices, debt bondage and coercion. As noted in regional reports by the International Organisation of Migration (IOM), such conditions blur the boundaries between voluntary migration and trafficking, allowing criminals to insert themselves in otherwise legitimate mobility networks. Scam centres build directly on existing migration pathways, repurposing them for digitally enabled forms of exploitation.

4.1.2 Integration with existing illicit economies

Scam centres integrate into and diversify existing criminal economies, displacing traditional forms of trafficking when they first emerged, reflecting what scholars describe as a "multi-crime" or "convergent" model, where scam centres are seen as a functional adaptation to new technological and economic opportunities.

Cambodia emerges as a key node within these networks as reflected in mapping exercises conducted by the UNODC, identifying the country as a significant hub for cyber-enabled scam operations. Many profits from these illegal enterprises connected to individuals close to the Cambodian political elite. Certain developments, particularly in Special Economic Zones such as in Cambodia's Koh Kong, have been associated with opaque ownership and little regulatory oversight. For instance, investigations referring to entities like the LYP Group, including subsidiaries like the Koh Kong International Resort Club, and Export-Import (Business and Human Rights Centre, 2025).

4.1.3 Evolving organisation of trafficking networks

Trafficking has also evolved in ways that reflect broader regional trends in transnational organised crime: networks are characterised as flexible, transnational alliances involving actors from across jurisdictions.

There is indication that foreign criminal groups, particularly those linked to China, have played a significant role in expanding scam operations. They do not operate in isolation, but collaborate with local intermediaries and regional partners, forming hybrid networks that combine local knowledge (from local regulation to local cultural contexts) with transnational reach, which organizations are reported to pay tribute to local policing agencies. This method sustains trafficking by criminal coordination, taking advantage of structural government weaknesses, where criminal actors are able to operate with a degree of impunity due to informal arrangements and weak enforcement mechanisms.

4.2 Repercussions of Scam Centres on Cambodia

4.2.1 Declining regional political image

The proliferation of scam centres in Cambodia has consequences extending beyond criminality, reshaping the country's regional political standing, international credibility and economic prospects.

Scam centres have come into the crossfire in border disputes in the Southeast Asia region during the conflict in January 2026. Thailand bombed several Cambodian casino and hotel complexes in remote border regions which were claimed to be repurposed to function as scam centers (CSIS, 2026). While Cambodia has denied these allegations, Thailand was able to build on the narratives portraying Cambodia as a state intertwined with organised cybercrime to frame its strikes as an anti-crime enforcement to improve its international legitimacy (Ratcliffe & Siradapuvadoi, 2026). This demonstrates how scam centres have transformed into perceived security threats, becoming entangled in interstate conflict and part of a broader security landscape beyond the domain of law enforcement. In these places, trafficked laborers are forced to defraud victims around the world, generating billions of dollars annually for transnational organized crime groups. Thai officials alleged these sites were also being used by the Cambodian military (Dickson & Quitzon, 2026). While the military use of these sites remains contested, their targeting highlights the intersection of two seemingly distinct regional problems: a border dispute and the proliferation of scam centers.

As the Thailand - Cambodia borders are so long , even if an increased number of border guards were recruited, it is impossible to monitor migration across the borders. In the context of labour migration from Cambodia to Thailand, it is difficult to clearly separate instances of irregular migration from smuggling and trafficking in persons. This is because exploitation and trafficking are often extensions of, or coincide with, irregular migration. Migrants initially decide to migrate from Cambodia to Thailand in order to find employment, but abuse, exploitation and trafficking arise during the journey or upon arrival to Thailand (UNODC, 2017).

4.2.2 Declining international political image and consequent impediment on economic development

Persistent corruption at multiple levels of government has fractured Cambodia's political image on the world stage. The dismissal of reports of trafficking and detention as labour disputes, and little to no charges have been brought against high-level figures alludes to persisting government incompetence, despite verbal affirmations to resolve the issue (Kennedy et al., 2022).

As a consequence, the US Treasury's downgrade of Cambodia to "Tier 3" (the lowest possible rating) in its 2025 Trafficking in Persons report for the 4th year running (Kiripost, 2026), putting the country at risk of sanctions and reduced foreign assistance. On the other hand, in an Oct 2025 press release with Republic of Korea (ROK)'s Ministry of Foreign Affairs, Vice Minister of Foreign Affairs Kim Jina (AKP, 2025), who served as the head of the joint response team (in ROK) voiced strong concerns over the unlawful detention targeting Korean citizens due to the occurrence of employment scams. He called for the repatriation of Korean nationals, including the cremation and repatriation of the remains of a Korean national found deceased in the Bokor area of Kampot Province in August 2025. There was both negative coverage of Cambodia in the ROK, and Vice Minister Kim suggested that closer bilateral cooperation to improve the underlying situation should be explored. Consequently, the travel advisory from the Republic of Korea for Cambodia was upgraded. In fact, the World Justice Project ranks Cambodia among the worst in the world for rule of law, standing at an overall global rank of 141 out of 143 countries (WJP, 2026).

This largely negative perception of Cambodia has sparked concerns by the Cambodian government on the potential loss in investment and tourism (Ministry of Foreign Affairs, 2025), and similar long-term growth implications. Economic activity in Cambodia fails due to "the rise in irregular economic activities, irregular labour migration and trafficking in persons" (World Bank, 2025).

4.2.3 Media framing and international perspectives

The media has been an active actor in shaping perceptions of the human trafficking crisis in Cambodia and influencing responses to the phenomenon, observable in the rise in narratives through which this evolution of trafficking is understood.

Journalists were among the first to bring Southeast Asia's scam industry to international attention, turning scattered posts about incidents of being trapped in jobs in Cambodia into a coherent narrative about the large-scale cyber-scam industry linked to human trafficking (Keeton-Olsen, 2024). While local journalists provided deeper and on-the-ground reporting and broke key stories early, international investigative reporting has played a major role in elevating the scam centres, from what could be viewed as isolated criminal enterprises into a recognised security concern. Established independent newspaper sites, such as Reuters and the British Broadcasting Corporation (BBC), continue to report dire situations and government inaction (Kennedy et al., 2022). Documented forced criminality, abuse and governance failures that surround scam operations suggest its prevalence as a new avenue of human trafficking (Head, 2026). By amplifying victim testimonies and exposing abuse, it has contributed to international scrutiny, diplomatic pressure and reputational costs for Cambodia, thus generating and intensifying public perception and policy attention.

Yet, media framing is also deeply political. Trafficking coverage of Cambodia is often embedded with broader narratives of corruption, weak governance, and regional disorder, often reducing Cambodia to a mere site of criminality. Highly sensational reporting may privilege media-worthy accounts of cyber fraud and obscure structural drivers such as history, geographical constraints, labour migration and the political economy.

Cambodia faces the challenge of not just negative foreign coverage, but also the structural weakness of its own information and media environment. The erosion of independent journalism, including the closure of outlets and pressures placed on investigative journalists, has limited Cambodia's ability to build their own credible narrative surrounding border tensions and criminal activities like illicit scam centres (Sophalkalyan, 2025). Hun Sen shut down one of Cambodia's last independent media outlets Voice of Democracy in February 2023. The loss of independent media often results in incomplete information and the loss of important narratives (Ng, 2023), linking to sovereignty erosion. Cambodia's failing ability to communicate credible narratives on its governance to the international audience has limited its ability to govern, visible in their tensions with Thailand, where disputes of border security and scam centres have led to an "information war" (Sophalkalyan, 2025). Thus, it is observed that media is part of the ecosystem through which scam centres are regulated and internationally recognised and understood.

4.3 Evolving multilevel governance of human trafficking

4.3.1 Bilateral and regional frameworks and cooperation

Efforts to combat human trafficking in Cambodia reflect a multilevel governance approach, involving bilateral agreements, and regional and international cooperation mechanisms.

At the bilateral level, Cambodia has concluded labor migration and trafficking agreements with key neighbouring states, such as Thailand with the 2014 memorandum of understanding for Bilateral Cooperation in counter-trafficking and 2019 bilateral agreement on the Standard Operating Procedures (SOPs) on Case Management of Repatriation and Reintegration of Victims of Human Trafficking and Development of the Joint Plan of Action of SOPs. There is also the bilateral agreement between China and Cambodia on Strengthening Cooperation in Counter Trafficking in Persons, with processes currently to establish the working group and focal point of both countries for strengthening the cooperation between two countries to protect the victims of trafficking in persons. They have recognised trafficking as a shared security and development concern, prompting multilateral dialogues, joint repatriation efforts, and cooperative frameworks aimed at data sharing and migrant protection. While the bilateral model creates partnerships and allows for stronger partners to have a clearer incentive to act, these efforts are generally reactive as Cambodia continues to act only when external pressure intensifies rather than through continuous domestic enforcement.

At the regional level, trafficking has been formally recognised by ASEAN as a shared security and development concern, through instruments such as the Association of Southeast Asian Nations Convention Against Trafficking in Persons (ACTIP). This has sparked increasing acknowledgement of the complex cross-border jurisdiction enforcement needed. Nonetheless, ASEAN continues to face clear limits in its consensus-based decision making which slows action and its non-interference norms which discourage criticism of member states. Criminal networks for scam centres move faster than ASEAN bureaucracy, meaning that these frameworks are more a diplomatic signal than actively tackling the human trafficking crisis.

4.3.2 Expanding governance without effective enforcement

These frameworks signal increasing institutional recognition of trafficking as a transnational issue. However, their effectiveness remains uneven, as seen in the persistence of these trafficking networks. Persistent enforcement gaps, corruption, weak victim identification, and digital exploitation challenges complicate these efforts. ASEAN's foundational principle of non-interference, combined with variations in state capacity and the quality of governance across member states, constrains the depth of enforcement cooperation. Efforts remain constrained by state-centric uneven implementation and often a lack of political will. As a result, regional responses often remain reactive rather than preventive, with developments in frameworks not matched with effective enforcement.

5 Conclusion

This paper argued that the rise of digitally enabled scam centres in Cambodia does not represent a rupture from earlier forms of human trafficking, but a structural evolution of existing trafficking networks, shaped by longstanding governance weaknesses and regional dynamics. It has addressed the central question of how digitisation interacts with institutional conditions to transform the nature and scale of human trafficking.

The proliferation of scam centres is not driven by technology alone, but by the interaction between digitisation, weak regulatory frameworks, and transnational criminal networks. Cambodia's historical experience with trafficking, combined with persistent challenges such as uneven law enforcement, corruption, and limited institutional capacity, has created an environment in which trafficking networks are able to adapt and expand, irrevocably changing Cambodian society with regard to human and sex trafficking.

Digitisation has not replaced traditional trafficking systems, but has enhanced their efficiency, reach, and resilience, enabling new forms of exploitation such as forced criminality within scam operations.

At the same time, the expansion of bilateral and regional anti-trafficking frameworks demonstrates growing recognition of trafficking as a transnational issue. Governance responses remain constrained by fragmented enforcement, uneven political will, and the limits of regional cooperation mechanisms. A gap persists between formal institutional commitments and practical implementation, allowing trafficking networks to operate across jurisdictions with relative agility.

The integration of trafficking into digital and transnational criminal economies challenges traditional understandings of sovereignty, as state authority becomes increasingly difficult to assert over fluid, cross-border networks. Ultimately, the Cambodian case illustrates a wider pattern: human trafficking in the digital age is not simply a product of technological change, but of the interaction between digitisation and institutional vulnerability. Narratives must not obfuscate the continued known truth of governmental weakness that creates sustained harm to some of society's most vulnerable victims. Addressing it therefore requires stronger legal frameworks, more coherent enforcement, deeper regional coordination, and a recognition that trafficking networks evolve in tandem with systems meant to contain them.

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Section

V

Selected Coursework

Six papers completed during the academic year in Sciences Po coursework and identified as meeting publication standards, moving across fabricated imperial sovereignty in Manchukuo, gender hierarchy in ancient Korea, civic identity in Hong Kong, syncretic heritage in Bangladesh, architectural conservation in Bhutan, and EU-ASEAN institutional design.

FABRICATING SOVEREIGNTY: IDEOLOGY, LAW, AND IMPERIAL CONTROL IN MANCHUKUO

A Case Study of “Five Races Under One Union” and the “Kingly Way” (Ōdō)

Asia Pacific Research Circle

Sciences Po

Mattys RAMNAUTH

April 2026

Abstract

This paper examined the state of Manchukuo (1932–1945) as an experiment in what it terms fabricated sovereignty: the deliberate construction of the legal and ideological architecture of a sovereign state around a core of external military domination. It asked how the regime used law and ideology to manufacture the appearance of legitimate sovereignty, and why that project ultimately failed on its own terms. Through a close reading of two foundational doctrines—the Kingly Way (Ōdō) and Five Races Under One Union (Gozoku Kyōwa)—and the institutions they generated, the analysis traced the reciprocal relationship between ideology and law across welfare provision, education, religion, mass politics, and the judicial system. It found that these doctrines produced a genuine and detailed institutional order, yet were systematically undermined from within by a legal structure that reproduced racial hierarchy, and from without by the Kwantung Army's override of civilian and judicial authority. The paper concluded that Manchukuo was neither simply a puppet state nor a legitimate sovereign experiment, but an elaborate and partially functional fabrication that reveals the grammar of imperial legitimation in the twentieth century: the institutions of sovereignty could be manufactured in detail without ever constituting the real thing.

Keywords: Manchukuo, Japanese imperialism, sovereignty, Kingly Way, Five Races Under One Union, legal history

Author Note

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1 Introduction

In the early morning of September 18, 1931, officers of the Japanese Kwantung Army staged an explosion on the South Manchurian Railway near Mukden, a pretext so transparently manufactured that the League of Nations later rejected it outright. The Kwantung Army was the garrison force Japan stationed in the Kwantung Leased Territory at the southern tip of Manchuria and along the South Manchurian Railway zone. Although nominally a single field army within the imperial military, it had grown into a semi-autonomous political actor that frequently acted ahead of, and at times against, the wishes of the civilian government in Tokyo. It was this army, not the metropolitan state, that engineered the Manchurian takeover and would subsequently serve as the true centre of gravity in the new regime. Within months, Japan had seized the entire northeastern Chinese region and, on March 1, 1932, proclaimed the independent state of Manchukuo under the restored Qing emperor Puyi.

To the outside world, Manchukuo was an obvious fiction. Foreign observers quickly saw that its claim to independence was a disguise for Japanese control, not genuine self-determination. To its architects, however, it was an ambitious experiment in what might be called fabricated sovereignty: a deliberate effort to assemble the institutional and symbolic means of a real state around a core of external military domination.

Previous literature has long debated whether Manchukuo should be understood merely as a puppet state, that is a convenient administrative facade over brute military occupation, or as something more structurally complex. This paper argues for the latter reading while insisting that complexity does not redeem the regime's violence. Manchukuo was simultaneously a puppet and an elaborate ideological project: a state that invested enormous institutional energy in constructing the appearance of legitimate, multiethnic, benevolent governance, even as the Kwantung Army retained final authority over every meaningful decision.

This raises the central question of this study: *how did the Manchukuo regime use law and ideology to manufacture the appearance of legitimate sovereignty, and why did that project ultimately fail on its own terms?* To answer it, the analysis centres on two foundational doctrines: the "Kingly Way" (Ōdō, 王道) and "Five Races Under One Union" (Gozoku Kyōwa, 五族協和). It traces the reciprocal relationship between ideology and law, showing how each continuously shaped and reshaped the other. It then examines how the very juridical order these doctrines generated ultimately reproduced racial hierarchy and remained subordinate to military will. By "legal" and "institutional," this paper refers concretely to the regime's written statutes and codes, its court system, its administrative ministries, its single official political party, and its state-supervised educational and religious bodies. All of those elements make up the tangible apparatus through which abstract doctrine was meant to become governing practice.

The racial hierarchy at issue should also be named clearly from the start. Despite the official rhetoric of five equal peoples, the regime in practice ranked its population, placing Japanese settlers at the apex and positioning the Korean, Manchu, Mongol, and especially the Han Chinese majority in subordinate and unequal positions. This ranking, examined in detail below, structured wages, judicial treatment, land rights, and even diet.

While Manchukuo functioned in practice as a puppet state, it must also be understood as an experiment in legitimising imperial rule through legal and ideological state-building. Through the doctrines of the Kingly Way and Five Races Under One Union, the regime officially sought to construct a vision of harmonious and sovereign governance. Yet this project remained fundamentally contradictory: even as these frameworks produced a detailed institutional and juridical order, they were systematically undermined by Kwantung Army control and the persistence of racial hierarchy. Manchukuo thus reveals how imperial domination could be formalised through the language of sovereignty without ever relinquishing external control.

The argument proceeds in three steps. Section 2 examines how the Kingly Way was translated from a moral doctrine into a basis for legal and political authority. Section 3 analyses how Five Races Under One Union was engineered into a concrete multiethnic order through education, religion, and mass politics. Section 4 shows how both projects broke down; internally, through a legal order that reproduced racial hierarchy, and externally, through the Kwantung Army's override of civilian and judicial authority. Section 5 concludes.

2 The Kingly Way: From Moral Doctrine to Legal-Political Order

2.1 Ideological Foundations as a Basis for Legal Authority

The Kingly Way was presented as a distinctively Asian mode of governance, one that synthesised Confucian moral philosophy with the institutional machinery of a modern state. At its core, Ōdō restated the classical Confucian ideal of benevolent rule: the emperor bears responsibility for the welfare of his subjects, who in turn owe him loyalty and service. Yet Manchukuo's architects were careful not to confine Ōdō to the registers of antiquity. The doctrine was simultaneously framed as a programme of modernisation: a vehicle through which China could reclaim historical vitality after what Japanese ideologues characterised as centuries of internal decadence and Western imperial interference. Through this framing, Japan was not conquering its neighbour but rescuing a civilisation from its own decline, a narrative that conveniently recast occupation as restoration.

This dual framing carried significant constitutional implications. If all political authority ultimately derived from the emperor's moral virtue rather than from popular sovereignty or colonial decree, then Manchukuo could plausibly claim a form of indigenous legitimacy unavailable to, say, British India. The distinction mattered enormously to the regime's self-presentation: where European empires governed openly as foreign rulers, Manchukuo claimed to govern through a revived local moral tradition. As Thomas DuBois has shown, Manchukuo's jurists borrowed liberally from Japanese legal models while insisting that the resulting code expressed distinctly Manchurian moral values. The result was a hybrid architecture: rule-of-law language borrowed from Western constitutional theory, emperor-centred legitimacy borrowed from Confucian tradition, and administrative ambition borrowed from the Meiji developmental state.

2.2 Legal, Institutional, and Social Practices Producing Ōdō in Reality

The Kingly Way was not merely rhetorical: the regime invested real administrative energy in translating it into tangible governance. Three overlapping pathways are identifiable.

First, benevolent governance was performed through social welfare. Disaster relief was systematised and, at least in its public presentation, efficient. In 1932, when massive floods struck Manchuria, victims along the Sungari River and communities displaced by the initial Japanese invasion received state funding (Narangoa, n.d.). Tax reductions were also enacted, certain feudal customary titles abolished, and public health campaigns launched under the banner of ‘Environmental Hygiene,’ which promoted urban clean-ups, improved ventilation standards, and the installation of sanitation facilities in rural households. These measures served a dual function. On the one hand, they delivered genuine administrative improvement to populations that had previously received little from any central authority. On the other, they offered ideological demonstration: proof, for both domestic and international audiences, that the Kingly Way governed through care rather than coercion. The performative dimension was inseparable from the practical one: welfare was simultaneously a service and a spectacle of legitimacy.

Second, the regime built an educational and associational infrastructure to propagate Ōdō. The official Concordia Association (Kyōwakai) served as the regime’s single legal political party and organised popular mobilisation around its moral principles. Founded in 1932, the Concordia Association was conceived as a mass organisation that would bind the population to the state’s ideology through local branches, youth groups, and propaganda campaigns, functioning less as a vehicle for political competition than as a transmission belt for official doctrine. New institutions of higher learning; notably the Judicial Law School and Foundation University; were established to train the administrative and legal elite of the emerging state (Siverson, 2020). The Ministry of Social Affairs instructed provincial governments to promote model citizens and reward exemplary moral behaviour, extending the ideological project into everyday communal life and giving abstract doctrine a concrete disciplinary edge.

Third, and perhaps most tellingly, Ōdō was institutionalised through law. Manchukuo adopted a legal code closely modeled on Japan’s, though with significant local modifications. For instance, corporal punishment by flogging, abolished in Meiji Japan, was retained for Manchurian subjects on the grounds of so-called “cultural difference”. This justification, embedded in a discriminatory logic would later become explicit. A four-tiered court system (Supreme, High, District, and Sub-district Courts) was established, substantially expanding the number of judicial organs and extending at least the formal apparatus of rule of law into rural and peripheral areas. Whether the domestic legal system operated with genuine efficiency remains contested; however, the 1937 treaty revision lends at least partial credence to its functional coherence (DuBois, 2008). Under that revision, Japan formally abolished the “extraterritorial rights”; the privilege by which Japanese nationals had been exempt from local courts and tried under their own law. That Japan was willing to surrender this privilege suggests that the regime’s judicial institutions had achieved sufficient legitimacy, at least on paper, to sustain a degree of formal sovereignty.

3 Five Races Under One Union: Building a Multiethnic Order

3.1 The Ideological Claim and Its Translation into Legal Categories

If the Kingly Way supplied Manchukuo's vertical axis of legitimacy (the moral bond between emperor and subject) then Five Races Under One Union (Gozoku Kyōwa) supplied its horizontal axis: the claim of ethnic inclusion and co-prosperity. The doctrine posited that Manchukuo embodied a harmonious partnership among the five principal peoples of East Asia: Japanese, Han Chinese, Manchu, Mongol, and Korean. Their 'shared blood,' in the regime's language, linked their fates in the coming Greater East-Asian Co-Prosperity Sphere. Manchukuo was explicitly presented as an 'earthly paradise' of inter-ethnic co-existence (Wilson, 1995). This, in turn, was said to make its system fundamentally distinct from, and morally superior to Western colonial models premised on overt racial domination.

The flag of Manchukuo gave this doctrine visual form: four horizontal stripes in red, blue, white, and black against a yellow field, each colour notionally representing one of the five groups in their shared civilisational project. This symbolic register extended into law through ambitious ethnographic codification projects. As DuBois has documented, the regime conducted large-scale surveys of the customary legal practices of each ethnic community in order to incorporate them into family law and inheritance statutes (DuBois, 2006). The stated goal was to demonstrate that Manchukuo's legal order respected cultural difference rather than erasing it, in deliberate contrast with the universalising pretensions of Western liberalism. Ethnographic knowledge, in other words, was not merely academic: it was a tool of governance, gathering the raw material from which a supposedly inclusive legal order could be assembled.

3.2 Institutional, Legal, and Social Practices Enacting Racial Harmony

The multiethnic ideal was pursued through four distinct institutional channels.

In education, a unified modern school system was constructed to integrate all five groups into a shared curriculum oriented toward industrialisation and civic identity. Textbooks were adapted for ethnic specificity: Mongolian pupils, for instance, received lessons on Buddhist teachings alongside the standard Manchukuo civic curriculum (Narangoa, 2001). Anti-illiteracy campaigns framed literacy simultaneously as a prerequisite of modern citizenship and as a gift of the benevolent state, folding education into the broader rhetoric of the Kingly Way.

In the domain of religion, the regime created state-supervised confessional bodies. Most notably the Buddhist General Assembly of Manchukuo, with its distinct sub-assemblies for Japanese, Mongol, and Manchu traditions, designed to harmonise religious practice under a single institutional umbrella. More strikingly, the regime invented syncretic traditions to reinforce its vision of civilisational unity: statues of Chinggis Khan were placed within Shinto shrines, aiming to bridge Mongol steppe memory and Japanese imperial religion in a single architectural gesture (Narangoa, 2001). Such inventions reveal how far the regime was willing to go in fabricating a shared sacred heritage where none had existed.

Politically, the Concordia Association organised youth centres and children's groups explicitly composed of members from all five ethnicities, cultivating what might be called 'Manchukuan pride' as a cross-ethnic affective identity. Li Narangoa has shown that these educational and associational efforts were not purely theatrical: they reflected genuine administrative ambitions to construct a functional multiethnic polity, however those ambitions ultimately remained contradicted by the realities of power.

4 The Limits of Ideological Sovereignty: When the Project Breaks Down

4.1 Law Reinforcing Hierarchy Instead of Equality

The ideological project's most fundamental contradiction lay not in its concrete failures but in its internal logic: the very legal structures erected to demonstrate equality systematically reproduced hierarchy. The racial asymmetry at the heart of Manchukuo was most visible in economic life. Manchu factory workers earned approximately thirty percent of Japanese workers' wages for equivalent labour. In the same facilities, different ethnic groups were served different food; white rice for Japanese employees, kaoliang (sorghum) for others (Tamanoi, 2000). These were not incidental inequalities but routine, institutionalised distinctions that directly discredited the rhetoric of shared blood and common destiny.

Blood-purity ideology further exposed the emptiness of the five-races doctrine. A 1942 government policy guideline explicitly stipulated that for Japanese settlers in Manchukuo, 'the mixing of even a single drop of Japanese blood should not be allowed.' This prescription for biological segregation directly contradicted the rhetoric of shared ethnic destiny: the same regime that publicly celebrated inter-ethnic harmony privately legislated to prevent inter-ethnic mixing. Judicially, the asymmetry was equally pronounced. Japanese judges retained final decisional authority over Manchukuo's courts regardless of the formal multi-ethnic composition of the bench. The previously mentioned practice of flogging, retained as a nod to local custom, was in practice applied exclusively to 'proper Chinese men'; thus it functioned as an instrument of racial discipline rather than culturally sensitive jurisprudence. In addition, forced land redistribution, the forced transfer of agricultural plots from Chinese and Korean families to incoming Japanese settlers, completed the picture of a legal order that protected ethnic hierarchy under the language of imperial benevolence. The pattern is consistent across each domain: a rule introduced in the name of cultural respect operated in practice as a mechanism of subordination.

4.2 Military Power Overriding Legal-Ideological Sovereignty

If racial inequality exposed the internal contradictions of Manchukuo's ideology, military supremacy exposed the external ones. The Kwantung Army's dominance over the state apparatus was institutionalised through the 'Internal Guidance' system (Naimen Shidō) (Wu, 2025). Under this arrangement, Japanese "advisers" were embedded throughout the ministries of the civilian administration, where they held effective veto power over policy. In form, the army merely 'guided' the government; in practice, it directed it on all matters of significant policy, while preserving the outward appearance of an autonomous Manchukuo state. By 1940, approximately seventy percent of senior administrative officers were Japanese, the majority of them loyalists appointed by the army (DuBois, 2008, pp. 300–305). Legal principles were subordinated to military convenience: retroactive amnesties (pardons issued after the fact to legalise conduct that had been criminal at the time it was committed) were used to absolve Japanese soldiers and officials whose actions would otherwise have constituted offences under Manchukuo's own statutes. The law, in other words, bent to power rather than constraining it.

The army's reach extended beyond formal governance into the economic foundations of the state. The South Manchurian Railway Company, the largest single enterprise in Manchukuo and a pillar of its developmental programme, was subordinated to military-industrial imperatives and compelled to redirect its technical and logistical capacity toward war planning. At the same time, the Concordia Association was progressively converted into a propaganda organ for Kwantung Army objectives, its original ambition as a vehicle of multiethnic civic identity hollowed out and replaced by wartime mobilisation.

Perhaps the most revealing single element is the army's contingency defence plan, which, in the event of a Soviet invasion, deliberately positioned the line of military defence so as to abandon the majority of Japanese civilian settlers to face starvation in the field. When that invasion came in August 1945, in the final days of the Second World War, the logic of this plan would be borne out at catastrophic human cost. The 'earthly paradise' of Five Races Under One Union could be sacrificed entirely when strategic logic demanded it. More strikingly still, the same Japanese settlers in whose name much of the project had been justified now merely became cannon fodder during the twilight of the empire. Even the welfare policies associated with the Kingly Way (disaster relief, sanitation campaigns, tax reductions) were endorsed by the Kwantung Army primarily as instruments of territorial stabilisation during wartime, not as expressions of any genuine moral commitment. In the final analysis, every institution of the supposedly sovereign state proved revocable at the army's discretion.

5 Conclusion

This paper asked how the Manchukuo regime used law and ideology to manufacture the appearance of legitimate sovereignty, and why that project ultimately failed on its own terms. The answer lies in the regime's distinctive character: Manchukuo was neither simply a puppet state nor a legitimate sovereign experiment. It was, more precisely, an attempt to use the architecture of sovereignty; legal codes, court systems, educational institutions, political parties, and state-supervised religion, to manufacture legitimacy for a form of domination that could not survive on coercion alone. The Kingly Way and Five Races Under One Union were not empty slogans: they generated real institutional structures, real welfare programmes, real legal codifications, and real affective identities among at least some of Manchukuo's subjects.

Yet those structures were fundamentally compromised from within and without. Internally, the legal order reproduced the racial hierarchy it claimed to dissolve, through wage differentials, discriminatory judicial practice, blood-purity legislation, and forced land transfers. Externally, every institution was subject to Kwantung Army override through the Naimen Shidō system, retroactive pardons, and the army's ultimate control over personnel and resources. The project failed on its own terms because its two doctrines presupposed an autonomy and an equality that the regime's deeper structure of military domination and racial ranking could never permit.

The broader significance of Manchukuo lies in what it reveals about the grammar of imperial legitimation in the twentieth century. As Western colonial powers increasingly faced demands for self-determination, Japanese imperialism developed a detailed alternative vocabulary. One that appropriated the language of sovereignty, law, moral governance, and multiethnic harmony while systematically hollowing out their substance. Manchukuo's experiment did not succeed, but it demonstrated with unusual clarity that the institutions of sovereignty can be fabricated, and that the fabrication can be detailed, elaborate, and partially functional without ever constituting the real thing.

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THE INFLUENCE OF TRADITIONAL ASIAN PHILOSOPHIES ON THE LEGITIMACY OF FEMALE RULE AND GENDER HIERARCHY IN ANCIENT KOREA

A paper which analyzes gender dynamics in Ancient Korea with a focus on Queen Sondok of Silla's rule, the first female ruler of Korea

Asia Pacific Research Circle

Sciences Po

Erika NANNETTE

May 2026

Abstract

In Korean history, the Silla era is known as one of great gender equality compared to many others because of the high influence of philosophies such as Buddhism and Shamanism had at its time. These two philosophies promoted gender neutrality and therefore facilitated the advancement of gender equality in Ancient Korea. As such, the Silla era saw the rise of Korea's first female sovereign: Queen Sondok, the 27th ruler of Silla. However, although the rise of a female ruler might be interpreted as a significant instance that could have established long-term gender equality in Ancient Korea, the rise of misogynistic philosophies — such as Confucianism and Neo-Confucianism — a few centuries later rendered invisible Queen Sondok's efforts in achieving this. Given this context, this research paper analyzes the significant role of traditional Asian philosophies in shaping gender dynamics in Ancient Korea. It first examines the role of Buddhism and Shamanism in reinforcing gender equality and legitimizing female rule. Furthermore, it analyzes the role of Confucianism and Neo-Confucianism in reversing this established order by putting forth a strict gender hierarchy which undermined the rights of women in Ancient Korea.

Keywords: Queen Sondok, Silla, Ancient Korea, gender norms, gender inequality, Buddhism, Confucianism

Author Note

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1 Introduction

Despite the time that has passed since they have emerged, many traditional philosophies continue to shape today's East Asian societies. Indeed, by promoting specific ideas and concepts, these philosophies have shaped norms that have been ingrained in these societies. As such, they have greatly contributed to contemporary gender dynamics and the overall perceptions societies have on gender hierarchy and equality. For example, in the case of South Korea, Confucianist philosophy has a prominent role in shaping the vision South Koreans have of gender hierarchy. As it is founded on the strong belief that the man is superior to the woman, South Korean society continues to hold values that do not entirely promote gender equality, although there have been several instances of progress at the state-level over the years (Kumar 2024). However, Confucianism is not the only philosophy that has shaped the gender dynamics in Korean society over time. Centuries before, other philosophies such as Buddhism and Shamanism, which did not promote a specific gender hierarchy, allowed Ancient Korea to flourish as a particularly gender-equal state compared to its neighbors. As such, the Silla era (57 BCE-935 CE) saw the rise of its first female sovereign: Queen Sondok (r. 632-647 CE), the 27th ruler of Silla. Although there were few instances of opposition against the Queen's rule because of her gender, the Buddhist and Shamanistic foundations of Korea were what allowed her to progressively emerge as a powerful leader at a time of great tension between the Three Kingdoms of Korea: Silla, Paekchae (18 BCE-660 CE) and Goguryeo (37 BCE-668 CE) (Cartwright 2016).

Three Kingdoms of Korea Map
Ashraf Kamel (CC BY-NC-SA)

Given this context, one could infer that Queen Sondok's reign could have been a pivotal event in Korean history that would have led to the increasing recognition of women's rights. However, while it is not wrong that the Queen's reign remains one of the most notable instances of female leadership in Korea, it is questionable whether she set ancient Korea on the path of gender equality; as only a few centuries following her rule, the rise of

Confucianism significantly strengthened gender inequality in the country. This new school of thought, now criticized for being misogynistic, strongly promoted patriarchy; thus, a vision of society where the woman is under the control of the man (Kumar 2024). Hence, by the beginning of the Joseon era (1392-1910 CE), when Confucianism had taken over the two philosophies that regulated Silla and Goryeo (918-1392 CE) — Buddhism and Shamanism — it was as if the rule of Queen Sondok had meant nothing in the progress of women's rights in Korea. As such, the case of Queen Sondok illustrates the greater influence of traditional philosophies in shaping gender hierarchy and norms in Ancient Korean society.

Representation of Queen Sondok
Son Yeon-chil, Professor Emeritus
of the Department of Fine Arts at Dongguk University, 2018

All of this leads to the following research question: to what extent did traditional Asian philosophies — including Buddhism, Shamanism, Confucianism and Neo-Confucianism — strengthen and/or weaken the legitimacy of female rule and gender equality overall? (I) To begin with, the paper analyzes the gender dynamics shaped in Ancient Korea through its Buddhist and Shamanistic foundations. (II) Furthermore, the second part develops on the growing influences of these two philosophies during Queen Sondok's reign and their usage as a tool to gain political legitimacy. (III) Ultimately, the paper argues the significant influence of Confucianism and Neo-Confucianism in shaping new perceptions of gender within Korean society, showing that instances of female rule have a lesser impact than traditional philosophies in establishing gender dynamics.

2 Methodology

To address the question of the extent to which traditional Asian philosophies shaped gender dynamics in Ancient Korea, qualitative research was conducted in the form of historical review. Specifically, this author mainly relied on secondary sources that covered the evolution of philosophies in ancient Korea as well as their impact on the perception of women, gender hierarchy and the legitimacy of female rule in Ancient Korea.

3 Literature Review

This research paper focuses on two primary perspectives identified in the literature covering its topic: the influence of Buddhism and Shamanism in promoting gender equality in Ancient Korean society and the influence of Confucianism and Neo-Confucianism in reinforcing gender hierarchy and the idea that women are inferior to men.

A significant body of literature covers the idea that Buddhist and Shamanistic values were key in promoting gender equality and therefore, legitimizing female rule such as Queen Sondok's. To begin with, scholars such as de Silva (1998) and K. T. S. Sarao (2010) argue that Buddhism implicitly promotes gender equality as its leading figure, Buddha, and the core idea of rebirth are founded on ideas of gender neutrality. Furthermore, scholars such as Kendall (1985) and Nelson (1993) claim that the presence of female deities in Shamanistic belief reinforced gender equality in Ancient Korean society. As such, scholars such as Mohan (2005), Kim (2008) and Cartwright (2016) explain that Queen Sondok was able to reinforce her legitimacy as a female ruler through Buddhist policies. For example, by erecting monuments embodying Buddhist philosophy. Additionally, Mohan (2005) and Kim (2008) also argue that the Queen reinforced her legitimacy by portraying herself as a Shaman.

This idea that traditional philosophies shape gender dynamics is further developed by studies on Confucianism, Neo-Confucianism and their influence on gender perspectives in ancient Korean society. Scholars such as Kumar (2004) and Maynes (2012) explain that women's place in Ancient Korean society was rapidly undermined with the rise of Confucianism and Neo-Confucianism. As such, Kim (2020), Kim (2008) and Cho (2016) claim that the spread of these two philosophies in Ancient Korea rendered invisible the efforts made by Queen Sondok to legitimize female rule and achieve gender equality.

4 Prior to Queen Sondok's reign, a context of relatively high gender equality shaped by Buddhism and Shamanism

4.1 Ancient Korean society's perceptions on gender equality

Even prior to Queen Sondok's reign, the Silla era distinguished itself from former and latter periods for its nearly equal treatment of men and women. In the Kingdom of Silla, women were granted considerable rights as they were viewed not only as secondary citizens but as actual actors capable of contributing to the growth of society. Indeed, not only did lower and middle class women make considerable domestic contributions by working in agriculture and assisting their male relatives in trades, but they were also involved in broader political affairs.

For instance, they contributed to the tax (Maynes 2012) and aristocratic women played a role in the governmental and judicial spheres (Bunaeva et al. 2022). Furthermore, in 6th-century Silla, competent young women were selected by the ruler to form the 'wonwha' and serve the State. Not only were they expected to be involved in politics but they also possessed strong physical abilities for quarrels (Nelson 1993). Additionally, in the domestic sphere, as women became heads of families when men went to war, they were given the responsibility to control the household. Thus, it was not unusual for them to be in positions of leadership. As such, women were given respect in the family; and in some cases, they took care of their children's education. That was the case of general Kim Yusin who served under Queen Sondok: he was "taught and instructed by his mother" (Kim 1997). Furthermore, women were allowed to move freely around the kingdom (Bunaeva et al. 2022); notably by riding horses (Kim 1997). From a legal standpoint, women were given rights that nearly equalized their social status to that of the men. For instance, as marriage was considered as an equal partnership between men and women, children could inherit their mother's surname. Another example is that sisters had equal rights with their brothers regarding property and slave inheritance. Additionally, there weren't any laws restricting women from a second marriage after separation; it was even considered natural behavior (Buaneva et al. 2022). As such, the Silla era is seen as a period when "women [...] enjoyed nearly equal legal status with men" (Andragogów 2022).

4.2 The influence of Buddhism and Shamanism in shaping Ancient Korean society's openness to gender equality

The core reason why the Silla Kingdom had given such a high social status to women, especially in comparison with its neighboring kingdoms, was its philosophical foundations. Silla was founded on two philosophies that found peace and stability in an order other than strict gender hierarchy: Buddhism and Shamanism. On the one hand, Buddhism is a philosophy founded on the figure of the Buddha, the 'enlightened one', that aims to offer a path to enlightenment. On the other hand, Shamanism is a spiritual practice centered on the shaman, an individual believed to be capable of communication with the spirit world (Encyclopedia Britannica 2026). While later scholarship has questioned the idea of gender equality in Buddhism and argued that it might be discriminatory of women by making them unable of becoming Buddhas or Bodhisattvas; in theory, this remains a question which the Buddha has left unresolved, an 'avyâkata'. Plus, the Buddhist idea on rebirth lets question the relevance of separating the male and female identity in a Buddhist context as it implies that gender can change over successive transmigrations. Hence, historically, Buddhism is a doctrine which puts little to no emphasis on gender hierarchy as there is very little that identifies it with a particular sex (de Silva 1998). Moreover, Buddhism claims that no man nor woman could be superior or inferior in society merely because of their birth (K. T. S. Sarao 2010): the only characteristic that would allow one to judge whether one is superior to the other would be their 'kamma' — their conduct (Dixit 2008). Hence, this idea suggests the minimal emphasis put on gender distinctions. As Buddhism was introduced in China around the Eastern and Later Han periods (25-220 CE), it was only a matter of a few centuries until it prospered in Korea given the geographical proximity (Angurarohita 1989). As an effect, Buddhist thought significantly shaped ancient Korean society. In the case of Shamanism, while it does not promote specific perspectives on gender, the equal importance it puts on men and women can be inferred from its traditions. For instance, traditional Korean Shamanistic ceremonies were often presided over by a female shaman (Kendall 1985). Furthermore, Koreans worshipped female Shamanistic deities. While female deities were not worshipped individually but as pairs with male deities, they were still figures of power. For example, Samshin, the goddess of Human Birth, was paired with Yeomna, the God of Death (Andragogów 2022). The fact that deities were always carved in male and female pairs could suggest equality in the Shamanistic spirit world (Nelson 1993).

It is not accurate to claim that the Silla era was one of complete gender equality as women continued to be under the jurisdiction of men and were subject to strict behavioral expectations. However, the degree of freedom that they could enjoy, owing to Buddhist and Shamanistic influences, made scholars characterize it as an "era of matriarchy" (Bunaeva et al. 2022). Therefore, it is in a context where small instances of female leadership were not uncommon that Queen Sondok came to the throne. The influence of Buddhism was particularly crucial in her ascension as, it is because of the lesser value that it put on gender hierarchy that the kingdom put greater importance on social hierarchy and made her ascension possible. It is nonetheless important to mention that the main cause which made the royal family consider her as an option for successor was the absence of a male heir (Cartwright 2016).

5 The Reign of Queen Sondok: efforts to strengthen the legitimacy of female rule and gender equality through Buddhist and Shamanistic policies

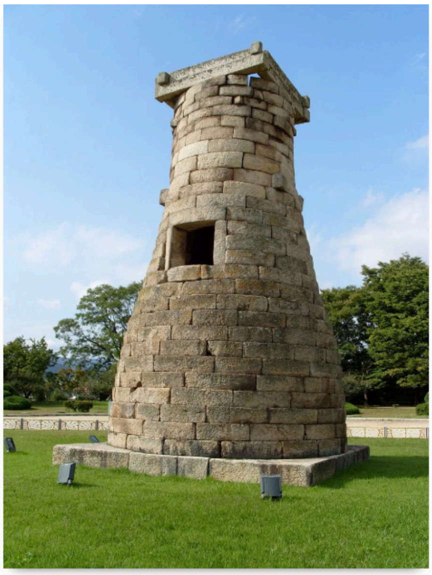
5.1 Ancient Korea's initial perceptions on Queen Sondok

Queen Sondok's ascension to the throne was legitimate: she belonged to Silla's highest social rank — the 'sacred bone' — and as she was chosen to be successor earlier in the previous king's reign, she is most likely to have gone through formal training since a young age (Kim 2008). Moreover, one could believe that the context in which her ascension happened would have strengthened this legitimacy, as the Silla society did not put great emphasis on gender hierarchy. However, as her ascension was nonetheless met with contestation, the perceptions on gender equality in Silla and in its neighboring kingdoms can be questioned. Indeed, even though Queen Sondok's rule could be interpreted as a symbol of growing gender equality in ancient Korea, the significant opposition she was met with during her reign casts doubt on the perceptions societies had on gender equality at that time. Even before her rule, at the end of King Chinpyong's reign (r. 579-632), Queen Sondok was met with a rebellion. Indeed, although the King's decision was supported by the leading council members of Silla, a part of the society did not approve of it (Kim 2008). One of the most significant critiques against the Queen's rule, recorded in the History of the Three Kingdoms — also known as Samguk sagi — were made by Emperor Taizong of the Tang. Queen Sondok came to the throne at a time when Silla heavily relied on Tang China's military support. Hence, misogynistic comments from Silla's most important ally could only weaken the Queen's rule. His statements were the following: "Your country took a woman as king, which has caused neighboring countries to have contempt for your kingdom, weakened the authority of kingship, and invited in brigands.

I will dispatch an imperial member to make a king for your country." The Emperor suggested to enthrone one of his relatives as king as he firmly believed that the kingdom would only get weaker because a female ruler, who 'naturally' lacked assertiveness and strength, was at its head (Kim 2008; Chu 1979). Additionally, he argued that because of it, the neighboring Kingdoms of Paekchae and Goryeo would only look down on it (Kim 2008). While there are suppositions that this story was invented to undermine the rule of the Queen, its existence showcases the discontent that rose in Silla from having a female ruler (Kim 2008). Another significant episode involving Emperor Taizong and highlighting the disrespect Queen Sondok faced because of her gender is recorded in the Memorabilia of the Three Kingdoms — the Samguk yusa. It is said that Emperor Taizong once sent to the Queen a painting of peony flowers which depicted no butterflies nor bees. This omission of butterflies and bees was interpreted as the Emperor's intentional choice to represent unscented flowers and thus, ridicule the Queen for not having a male partner. While there are more recent interpretations of this episode claiming that the Emperor had no such intention, this misinterpretation could have been added later to reflect his strong opposition to having an unmarried woman on Silla's throne (Kim 2008).

5.2 Queen Sondok's reliance on Buddhism to legitimize her rule

Therefore, in order to strengthen her legitimacy and contribute to the normalization of female rule in the long-run, Queen Sondok strongly promoted Buddhism. This greatly strengthened her reign as it allowed her to associate herself with Buddha, further enhancing her sanctity. Even the name 'Sondok', that she claimed following her ascension, refers to the cakravarti (Mohan 2005) — the ideal universal king who rules ethically over the entire world (Kim 2008). The intention behind this choice was to endorse herself as an incarnation of the Buddha (Cartwright 2016). Moreover, considering the interpretations that only males could become Buddhas, Queen Sondok pledged that she would be born in Kausika in her next life, in the world where Buddha himself exists (Kim 2008). To concretely endorse Buddhism, the Queen worked on many Buddhist construction projects: the most famous one being the Chomseongdae, the oldest observatory in East Asia. Indeed, not only is it believed that it was modeled after Mount Sumeru, the highest point and center of the world recognized by Buddhism, it was also used as a place for Buddhist fortune telling (Kim 2008). Another outstanding example of Buddhist architecture is the nine-story timber pagoda built near the Hwangnyongsa temple in Gyeongju. This pagoda was the most ambitious architecture venture ever attempted in Silla; its construction was debated for many decades in court due to the high costs and labor involved. Thus, on the one hand, it helped Queen Sondok in affirming strong political authority as a competent female ruler. On the other hand, as the pagoda was thought to have been bestowed with Buddha's divine protection, it was believed to have made Silla invincible (Kim 2020). The Queen also built a Buddhist temple dedicated to her lineage in the 4th year of her reign: the Yongmyosa temple. Not only did this allow her to pay respect to the spirits of her ancestors who passed the throne down to her, it enhanced the sacredness of her lineage and served as evidence that she was the legitimate heir of her forefathers (Kim 2008). Additionally, the fact that Queen Sondok was proclaimed to belong to the Ksatriya caste, the warrior caste of India to which Buddha himself belonged, further legitimized her reign. This was done by Monk Chajang, one of the most distinguished leaders of early Silla Buddhism, who was at the service and fully supportive of Queen Sondok (Mohan 2005).



Cheomseongdae Observatory, Gyeongju
M. & N. Wilson (CC BY)

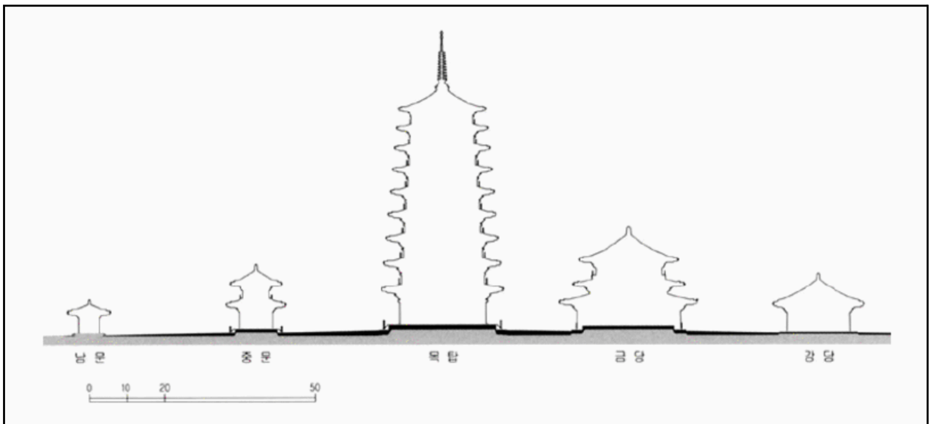


Diagram showing relative sizes of the buildings
at Hwangnyongsa in Gyeongju, North Gyeongsang Province.
Courtesy of the National Research Institute of Cultural Heritage

5.3 Queen Sondok's reliance on Shamanism to legitimize her rule

However, Queen Sondok did not only rely on Buddhism to legitimize her rule; rather, she relied on a form of syncretism by also promoting Shamanism. As a significant part of the ritual system in early Silla was constituted of Shamanistic beliefs and practices, Buddhism alone "could not succeed in exercising the complete control of [...] the Silla people" (Mohan 2005). This was especially true for the lower echelons of its society, where Buddhist morals had yet to spread. Thus, the Queen reinforced her legitimacy through stories showcasing her ability to foresee future events, just like a Shaman. The Samguk yusa recounts three of the Queen's predictions. For instance, it is believed that on one winter day, the Queen heard that there was a flock of toads on the west side of the palace. She interpreted this irregular presence as a warning for a Paekchae invasion through the western frontier of the kingdom. Thus, she ordered generals to rush to the western outskirts of the capital with two thousand soldiers. It turns out her prediction was right, there were five hundred Paekchae soldiers hiding, ready to attack Silla. These soldiers were then defeated, owing to the Queen's Shamanistic skills (Mohan 2005; Kim 2008). Not only did such stories create a strong connection between the Queen and Shamanism, a philosophy which defined the world view of many at the time of her reign, but they also highlighted her intelligence (Mohan 2005).

However, the fact that contestation continued until the very end of her reign suggests the lack of influence her 16-year rule had in changing the perceptions of Silla's society on gender equality. Indeed, at her deathbed, Queen Sondok was met with a final rebellion against her rule: Pidam's rebellion. Although Pidam had served for two years as a Sangdaedung — the highest office in court one can hold, being only second to the throne — under the Queen, he launched the rebellion, convinced that it was improper for a woman to assume power (Mohan 2005). However, although Queen Sondok was met with such forms of oppositions and had to make efforts in order to establish her authority, it is a fact that she ruled until the end of her life with no usurpation challenging except the rebellions that happened at the beginning and at the end of her reign (Kim 2008). This serves as evidence of her outstanding capacities as a ruler who contributed to Silla's expansion which, in 668 CE, culminated in the unification of Korea under the rule of Kim Chunchu (Cartwright 2016).

6 The aftermath of Queen Sondok's reign: the first figures of female leadership in Korea, whose impact was rendered invisible by the rise of Confucianism and Neo-Confucianism

6.1 Between openness and growing opposition to female rulers in Ancient Korea

While Queen Sondok's reign was extremely significant in the advancement of gender equality in ancient Korea, the rebellion at the end of her reign was a clear sign of Silla's growing discontent with having a female ruler. Nonetheless, the overall Silla society tolerated having a female ruler as Queen Sondok's successor, Queen Jindeok (647-654 CE), was female. It was also the case for Silla's last ruler, Queen Jinseong (r. 887–897) (Kim 2018).

6.2 The influence of Confucianism on Ancient Korean society's perceptions on gender equality

However, despite this progress to which Queen Sondok was the pioneer, the significance of her reign was rendered invisible within a few years with the rise of Confucianism in Korea and specifically Neo-Confucianism. Indeed, only a few centuries after the end of the Silla era, in the middle of the Goryeo era, the spread of this new philosophy which strongly emphasized the submission of women obscured the significance of the Queen's reign (Kim 2020). Confucianism is a philosophy or more specifically, a compilation of thoughts, ideas and teachings from a Chinese scholar named Confucius (551-479 BCE). It revolves around virtues such as benevolence, righteousness, respect or wisdom; and offers guidance on how people should conduct themselves in society. However, it is also a doctrine which promotes patriarchy, arguing that the submission of women to men is necessary for social harmony. For example, Book no. 17 of the Analects, also known as the Sayings of Confucius, equates women to small minded men by claiming that “[i]t’s women and small minded men that are impossible to nurture” (Kumar 2024). The Samguk sagi itself serves as an evidence of the changing perceptions of women with Confucianism, in 12th-century Korean society. Indeed, Kim Pu-sik, the main scholar-bureaucrat who was in charge of compiling the chronicle, commented at the end of the section on Queen Sondok that an elderly woman like her should not have ruled (Kim 2008). Specifically, he asked: “how could [Silla] let the old woman come out of her inner quarter and be in charge of political affairs ?”, arguing that “[t]he fact that Silla took a woman to the throne really can be found in times of chaos. It is fortune, therefore, that Silla was not ruined for this” (Cho 2016).

6.3 The influence of Neo-Confucianism on Ancient Korean society’s perceptions on gender equality

However, in Korea, rather than ‘pure’ Confucianism, an alternative form of it called ‘Neo-Confucianism’ spread even further during the Joseon dynasty. While the two philosophies do not differ much in terms of gender rights, this new form of Confucianism was promoted by Korean scholars who believed that Confucianism lacked a sophisticated metaphysical and cosmological basis for their ethical codes yet wanted to “offer a cosmology that could compete with the Buddhists” (Creel 1971). In other words, it is a philosophy which arose to “protest” against Buddhism (Angurarohita 1989). As an effect, the progress made in achieving gender equality during the Silla era further eroded as Buddhism — a philosophy which did not put emphasis on gender hierarchy — was portrayed as a rival philosophical system that should not be referred to anymore. For instance, in Neo-Confucianist thought, Buddhists were referred to as “masters of glibness, lewdness, trickiness, and evasiveness”, contrasted with the “sage” Confucians who “[worked] for the welfare of the people” and “[avoided] activities that would bring [them] harm” (Cawley 2021). As a result, Buddhism significantly lost in influence following the Silla era. This also explains why, following this period, it was not accepted as the state religion anymore. Hence, having lost the philosophical foundation for its legitimacy, gender equality became less and less present in Korean society.

Although at the beginning of the Goryeo dynasty — a period which was still under strong Buddhist and Shamanistic influences — Korea still had a fairly liberal stance on the place of women in society, their status began to increasingly decline with the growing influence of Confucianism and Neo-Confucianism. Therefore, by the Joseon era, gender equality in Korea was practically nonexistent, to a point where it would have been hard to believe that only a few centuries ago, a woman was at the head of this country. In Confucian thought, women could only be “weak burdens” (Maynes 2012).

5 Discussion and Limitations

While this study was based on sources that make a clear distinction between Buddhism and Neo-Confucianism due to the fact that the latter considered the former as a ‘rival’ philosophy, it is to be recognized that Buddhism significantly contributed to shaping Confucianism. Indeed, since Buddhism had become an intimate part of Chinese intellectual life for several centuries, it was impossible for it to be entirely replaced by a new philosophy. For instance, the Buddhist idea that every sentient can cultivate their mind and become enlightened strongly influenced the Confucianist concept of sagehood as an attainable goal through self-cultivation (Angurarohita 1989). Nonetheless, Neo-Confucian scholars still sought to distinguish their teachings from Buddhism and were convinced that Buddhist notions were incompatible with the Confucian way of life.

6 Conclusion

In conclusion, traditional Asian philosophies — including Buddhism, Shamanism, Confucianism and Neo-Confucianism — significantly shaped gender dynamics in Ancient Korea, to the point that the latter two were capable of rendering invisible a remarkable instance of Korean history which had created hopes for the advancement of gender equality. Indeed, although Queen Sondok nearly succeeded in affirming the legitimacy of female rule throughout her reign, the rise of new philosophies a few centuries later undermined her efforts to advance gender equality. From a contemporary point of view, Queen Sondok's reign is a landmark event of Korean history, as she stood as the evidence that there is "no distinct difference" in terms of competences between female and male rulers (Kim 2008), owing to Buddhist and Shamanistic influences. Thus, it could be expected that her reign would have had a direct impact on ancient Korean gender hierarchy and thus, led to an even more equal society. However, due to the rise of Confucianism and Neo-Confucianism, the efforts she made to prove how gender did not impact a ruler's performance were rendered invisible. This was until the late 20th century, when interest in her gradually revived in Korean historiography.

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THE MAINLAND THROUGH THE EYES OF HONG KONG

How Anti-Mainland Sentiment and Civic Identity Formation Have Transformed Sino-Hong Kong Relations Since 2010

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Abstract

This paper examines the development of anti-mainland sentiment among Hong Kong residents since 2010, asking to what extent a distinct Hongkonger identity has emerged as a response to the perceived threat posed by Mainland China. Utilising government statistics and academic literature, the paper finds three distinct ways in which Hongkongers have come to see the threat: demographic, cultural and political. The first section focuses on the fear of increased competition, resource scarcity, migration, and the ‘double not’ children. The second section analyzes the formation of a distinct civic identity tied to democratic values and a growing simultaneous opposition to Chinese identity in the context of the 2012 and 2014 popular movements. Together, these dimensions reveal a self-reinforcing dynamic in which stronger identification as a Hongkonger produces a greater perception of mainland threat, which in turn deepens that identity.

Keywords: Hong Kong identity, mainland China, localism, civic nationalism, demographic threat, Sino-Hong Kong relations

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1 Introduction

Hong Kong and China share a common ethnicity, culture, and state, so why is it that by 2019, more than half of the Special Administrative Region's population refused to identify as Chinese?

Ceded officially in 1842, Hong Kong became a British colony for more than 150 years (Carroll, 2007). Under Western governance, a number of values and ideas central to that part of the world were introduced and later codified in the Basic Law of 1990 (Carroll, 2007). These included democracy, freedom of speech and press, which came to define the Hongkonger way of life (Carroll, 2007). Despite that, by 1997 the lease had expired, and Hong Kong had to be returned to the People's Republic of China as a Special Administrative Region governed by "one country, two systems," promising autonomy and continuity (Tse, 2016, pp. 3–5). However, growing mainland influence has since caused worries over cultural erosion and demographic threat, prompting the question of whether Hongkongers now perceive China as a danger to their identity and well-being.

The central question to this paper will examine precisely that: to what extent has a distinct Hongkonger identity been formed since 2010 as a way to oppose the perceived threat associated with the Mainland? To answer that, Hongkongers have come to view the Mainland as a perceived threat demographically, culturally and politically, all the while creating a distinct and antagonistic identity, opposed to the Chinese one. The first section examines the perceived demographic threat, focusing on the anxieties around resource competition, system exploitation, and mainland migration. The second analyses the formation of a distinct Hongkonger identity based on civil liberties. This paper will rely on academic sources, media articles, government statistics, and survey data to help provide substantial information on the changing Hong Kong-Mainland relationship.

2 Theoretical Framework

This paper is centered around two academic dimensions. The first has to do with the development of a distinct civic identity, as opposed to an ethnic nationalist one. This is typically observed in post-colonial settings where the identity is rooted in the association with shared institutions, values, and civil liberties, independent of the shared ethnic heritage (Veg, 2017). Hong Kong is a good case study of this considering its post-handover trajectory. The second concerns the social psychology of perceived threat. Factors like competition over resources and fears of demographic displacement have fallen right into the group threat theory wherein there is an observable rise in hostility between groups, accompanied by the strengthening of in-group identities (Xu et al., 2023). Together, these frameworks illustrate how Hongkongers have constructed a distinctive civic identity, grounded in rule of law and freedom of expression, in active opposition to both the perceived demographic pressure from mainland migration and the authoritarian political values they associate with the central government in Beijing. The concept of 'emotive icons' developed by Fung and Chan (2017) provides additional depth by focusing on the changing attitudes towards the shared national symbols of China and Hong Kong.

3 Methodology

The paper is based on a qualitative analytical approach in which no primary data were collected independently. The empirical data consists of peer-reviewed academic literature, survey data from the Hong Kong Public Opinion Research Institute (HKPORI) and the Pew Research Center, government statistics from the Hong Kong Census and Statistics Department and the Immigration Department, and publicly available media reports. The sources were selected with attention on the post-2010 period when the identity shift became measurable.

4 Analysis and Findings

4.1 The Perceived Demographic Threat

First, Hongkongers have come to view China as a threat because of the perceived demographic danger mainlanders pose in respect to resource competition, system exploitation, and growing migratory flows. A symbol that has come to describe this attitude is the infamous "locust ad" from 2012.

Figure 1. Full-page advertisement published in Apple Daily, February 1, 2012, depicting mainland Chinese tourists as locusts. Reprinted from CNN (2012).

A reader-sponsored ad, it reflects the concerns of local Hong Kong residents that the constant inflow of mothers and children from the mainland is motivated by a desire to give their newborns the right of abode and to benefit from social benefits and welfare on the backs of the citizens (Lai, 2012). The term "locust" was also used a few years later when a group of 100 activists went into a shopping mall, frequented by mainlanders, and shouted that they should go back to China while carrying banners with the derogatory word (Tiezzi, 2015). This anti-Chinese sentiment is part of a bigger concern over mainlanders "actively making life more difficult by raising real estate prices, monopolizing birthing wards in hospitals, and buying out necessities like baby formula (hence the term "locusts")" (Tiezzi, 2015). The last, specifically, was central to the dissatisfaction of locals with Chinese tourists who, according to them, engaged in "the practice of "parallel trading," wherein mainlanders buy Hong Kong goods in bulk with the aim of reselling them on the mainland" (Tiezzi, 2015). Consequently, these grievances over daily resources fueled more substantial and widely-shared claims on the mainlanders as posing a danger to the community.

With that said, the problem with Chinese mothers giving birth in Hong Kong remains prevalent in the public discourse and requires a deeper look. Other than occupying places and resources in birthing wards, this phenomenon has also created a new sub-set of society: "the 'double not' children (seung fei)" (Choi & Lai, 2020, p. 1194). As defined by the authors, these children are born in Hong Kong to mainland Chinese parents – where neither the mother nor the father holds Hong Kong residency or citizenship (Choi & Lai, 2020). Even though they become citizens thanks to the *jus soli* principle, the legal principle of birthright citizenship, they are still largely seen as illegitimate since neither of their parents is a legal citizen of Hong Kong (Choi & Lai, 2020). Comprising as much as 37% of births in 2011, they provoked public discontent and protests over the shortages of natal facilities and school places, demonstrating the view of Hongkongers towards mainlanders as a demographic threat (Choi & Lai, 2020). This is also reflected in the attitude of locals towards the Chinese immigrant parents. The latter experience exclusion across nearly every dimension of daily life – spatially, socially, economically, and culturally – being treated as second-class citizens subjected to prejudice, exploited or shut out of the labor market, and denied access to public housing and welfare (Li, 2026; Siu-lun et al., 2008). This is reflected in the testimonies gathered by the researcher Dr. Yao-Tai Li in his study of 32 mainland Chinese immigrants whose reflections demonstrated that migrants were viewed as colonizers, inferior, cast as outsiders, and forced to hide their Chinese origin (Li, 2026). Furthermore, despite the fact that for the first seven years they are ineligible for welfare payments, they are still seen largely as welfare recipients, with the stigma of them putting strain on the system actively driving public sentiment against said vulnerable groups (Li, 2026; Siu-lun et al., 2008).

Yet, Hong Kong is becoming a new home to more and more mainlanders. Government schemes like the Admission Scheme for Mainland Talents and Professionals (ASMTP), the Quality Migrant Admission Scheme (QMAS), the Immigration Arrangements for Non-local Graduates (IANG), and the Top Talent Pass Scheme (TTPS) have allowed more than half a million Chinese to settle since the early 2000s (Immigration, 2025). The goal is quite evident - to fix the labor shortages that could arise from the precariously low total fertility rate of the local population which stood at 0.772 children per woman in 2021, far below the replacement level of 2.1. (*Fertility Trend in Hong Kong, 1991 to 2021*, 2023). At the same time it has also become a source of fear for the Hongkongers whose worries, as already detailed so far, can only become exacerbated given the constant migratory flow of new arrivals and the tensions that could stem from this.

Furthermore, contrary to popular belief that highly-skilled immigrants are universally (or almost always) well perceived since they are considered a net benefit for society, Hong Kong stands as an exception. Siu-yau Lee's article from 2024, based on 54 in-depth semi-structured interviews with Hong Kong residents across a range of industries and age groups which were then compared with an original online survey of 1,432 respondents, recruited through a professional survey agency, suggested precisely that. It should be noted that the findings concerned all highly-skilled immigrants and not mainlanders exclusively which is certainly a limit worth recognizing, however, as demonstrated above, a very big portion of migrants come from China, therefore while not exclusive, the conclusions drawn apply to a very high extent to the purposes of this paper. According to Lee (2024) Hongkongers tend to perceive high-skilled immigrants as self-serving individuals who see SAR as a place to land well-paid jobs, send their children to prestigious international schools, and then leave, aligning with the idea of mainlanders only extracting from the system in the short to mid-term. Additionally, the interviewees expressed a strong belief that local workers should be protected and given priority, framing fairness not as open competition but as the preservation of Hongkongers' opportunities (Lee, 2024). This also intertwines with the concept of locals being pushed out and having to experience heightened competition on the labor market and in accessing public resources, to which they feel entitled given their long-term contribution to the city.

The paper also reveals a tension that is not captured by the testimonies of local residents. Hong Kong is simultaneously experiencing a severe brain drain and a pronounced skill shortage, as 85% of employers struggled to recruit skilled workers, yet even under these conditions of pressing labor market need, public support for immigration remained conditional and skeptical (Manpower Group, 2023, as cited in Lee, 2024). Based on national government statistics as of 2026, over 170,000 Hongkongers have moved to Britain alone with many others also gaining residency in Canada following the passage of the National Security Law in mid-2020 (Leung, 2023; Home Office, 2026). This data is complemented by the finding that 2020 and 2021 recorded negative net migratory values of more than -70,000 each, which was in part due to the easing of restrictions by Western governments which condemned the actions of China and welcomed immigrants from the SAR (Chan et al., 2022). The vacancies were filled by Chinese immigrants who were granted access to Hong Kong through the various established government programmes, for example, the One-Way Permit (OWP) System which allocated 150 entries per day for mainland migrants (Leung, 2023; Li, 2023). This serves to show that even when the arrival of high-skilled foreign workers is a net benefit to a society, in Hong Kong's case it could be argued that they are a necessity for the prolonged sustainability of economic growth, the societal pushback remains pronounced.

Lastly, it is important to consider the point of view of the young generation. According to Xu et al. (2023), those born in the 1990s in Hong Kong have the most unfavorable perception of Mainland China as the slowing economic growth and diminishing opportunities turn the mainlanders into competition for already scarce resources (Xu et al., 2023). Logically, these hostile attitudes come to the fore in times of economic crises, like those in 2008 and 2020, when the recession and decreasing opportunities are passed directly onto those just coming out of college (Xu et al., 2023). For example, youth unemployment hit a record 20.6% in late 2020, and less than half of the graduates in that year had a job three months after receiving their diplomas, the lowest on record (Census and Statistics Department, HKSAR, 2021). To better understand youth antagonism towards mainland migrants we should also consider the group threat theory, according to which dominant groups tend to oppose migrants when they feel their material interests or power are in jeopardy, and which complements the argument of this paragraph so far (Xu et al., 2023).

In conclusion, the resource competition, the sense of civic dispossession, and the economic precarity create an environment in which Hongkongers view mainland immigrants, including children born in the SAR and highly-skilled workers, as a threat to their collective and individual well-being.

4.2 Incompatibility and Redefinition of Identity

To better understand the growing antagonism directed towards the Mainland and its people, we need to consider the role of culture and identity in these processes. Hongkongers have come to culturally distance and redefine their identity in opposition to the perceived threat to their civic values and way of life stemming from the Mainland. However, the hostility was not there from the inception. Following the 1997 handover, Hongkongers and Chinese entered a 'honeymoon' period running parallel to the socio-economic integration of the SAR (Fung & Chan, 2017). This is reflected in the Hong Kong Public Opinion Research Institute statistics on self-identification which documented record levels of identification as *Chinese* and *Chinese + Chinese in Hong Kong* which stood at 38.6% and 51.9% respectively in mid-2008, coinciding with the aftermath of the Beijing Olympic games, with the latter even became the most widely adopted identity in that period (HKPORI, 2022). At the same time, *Hongkonger* alone dropped to its lowest level in history - 18.1%, while the value of *Hongkonger in China* increased (HKPORI, 2022). This demonstrates the extent to which the gap between the people of Hong Kong and the Mainland was reduced and the stark increase in people choosing to associate themselves with China.

However, this was short-lived, as starting from the 2010s a number of problems would come to define a new and oppositional Hongkonger identity. According to Fung and Chan (2017) the 'honeymoon' lasted so long only because it provided tangible benefits to Hong Kong, for example, the economic advantages of the newly-introduced CEPA free trade deal and the Individual Visit Scheme which increased the SAR's revenue. Once the detriments came to outweigh the benefits, i.e., congestion and disturbance of peace as a result of the excessively large numbers of Mainland tourists, the attitude quickly changed (Fung & Chan, 2017). Data shows this as by late 2019 *Chinese + Chinese in Hong Kong* dropped to an unprecedented low of 20.8%, combined with a record high of 55.4% for those identifying as *Hongkonger* (HKPORI, 2022). This is a noticeable shift in the opposite direction, wherein Hong Kong citizens clearly manifested themselves as distinct from their shared ethnic and national belonging to the Mainland.

This shift, however, was more than attitudinal. It was generational as Veg (2017) found that the generation born and educated following the handover, comprising the 18 to 29 year olds, was the most prone to separating itself from a shared Chinese identity and to identify exclusively as Hongkonger. This is further reinforced by the findings of the PEW Research Center from 2023 which provide an even deeper look. Based on a survey of 2,012 adults in Hong Kong fielded June 2-Sept. 17, 2023, the researchers found that 55% of people under the age of 35 identified as *primarily a Hongkonger*, compared to a 36% national average (Corichi & Huang, 2023). Crucially, 72% of them also did not feel an emotional connection to China, which proves a clear correlation between identity and perception of the Mainland, in this case demonstrating that the stronger one feels about being distinctly *Hongkonger*, the less attached they are to China in general (Corichi & Huang, 2023). We can also infer that a certain level of dichotomy has developed between the local identity and the national one, wherein they prove to be mutually exclusive or at the very least negatively correlated, so as to produce inverse results.

Central to the acceleration of this identity rupture were a few open confrontations which made clear the difference between "cultural China", the shared ethnic and cultural origin, and "statist China", the political leadership. The first were the anti-National Education protests of 2012, in which over 100,000 people mobilized against a government curriculum that framed Hong Kong identity in explicitly ethnic and racial terms (Veg, 2017). The citizens of the SAR were described as having shared "dark eyes, black hair, and yellow complexion" therefore belonging to the Chinese nation, which left no room for their distinct civic values (Veg, 2017). According to Veg (2017), the main result of the movement was to make evident the incompatibility between the authoritarianism associated with the Mainland and the democratic values of Hong Kong, drawing a clear line between the shared, uncontested ethnic belonging and the central role of civic values to the newly redefined Hongkonger identity, grounded in rule of law, freedom of speech, and democratic participation. Significantly, it enjoyed strong public support, especially among the 18-19 year olds where opposition to the curriculum reached 71%, an unambiguous statement about the generational shift in perception (Veg, 2017). The second confrontation came in the form of the Umbrella Movement in 2014 which called for the introduction of "genuine universal suffrage" and the rejection of a Beijing-led candidate vetting (Tse, 2016). This further pushed the crystallization of a civic identity, backed by a majority (81%) of protesters occupying Admiralty, Mong Kok, and Causeway Bay identifying themselves as Hongkongers (Veg, 2017).

To put into perspective how this political disillusionment translated into antagonism towards the "statist China", the political regime of the PRC, a significant change in the perception of emotive icons was documented in the same period. The emotive icons "are symbols that carry significant cultural meaning in relation to China, ranging from the political regime to the cultural and ethnic sense of belonging [and include] the PRC's national flag, the national anthem, the People's Liberation Army, the Great Wall, and Putonghua" (Fung & Chan, 2017, p. 401). Crucially, they are representative of the strength of the Hongkonger and Chinese identities of the SAR's citizens (Fung & Chan, 2017). Indeed, between 1997 and 2010 the pride in the Mainland's symbols, including the national flag, anthem, and the PLA, steadily increased (Fung & Chan, 2017). However, from 2010 onwards it was resistance to said symbols that increased, the most important changes being observable with the national flag jumping from 3.8% in 2010 to 13.7% by 2014 and Putonghua rising from 7.3% to 16.2% over the same period (Fung & Chan, 2017; see Table 1 and Table 2). It is important to note that this resistance was directed at "statist China" rather than "cultural China", i.e., pride in the Great Wall, an ethnic and historical symbol, remained comparatively high even as resistance to political symbols surged (Fung & Chan, 2017; see Table 1 and Table 2). This serves to strengthen Veg's (2017) claim that Hongkongers created an identity centered around their civic values, inherited from their colonial past, without rejecting their ethnic belonging and pride in heritage symbols like the Great Wall of China.

Table 1. Percentage of respondents who were proud of emotive icons of China (scoring four or five points out of five).

Emotive icon	1996	1997	1998	1999	2002	2006	2008	2010	2012	2014	2016
National flag	30.6	30.1	24.9	29.9	31.1	47.6	53.4	52.7	37.6	29.5	36.9
National anthem	39.1	40.1	28.3	36.0	38.1	48.2	53.0	54.8	36.4	31.8	36.1
People's Liberation Army	10.0	13.6	13.7	16.5	18.9	28.8	29.6	33.5	21.5	17.4	22.8
Putonghua	18.6	21.3	19.9	28.0	25.2	34.0	30.4	28.5	22.4	16.7	17.8
Great Wall	77.9	78.8	74.0	78.5	79.3	73.3	74.2	71.3	60.4	50.9	54.5

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Table 2. Percentage of respondents who resisted emotive icons of China (scoring four or five points out of five).

Emotive icon	1996	1997	1998	1999	2002	2006	2008	2010	2012	2014	2016
National flag	6.6	4.7	4.6	2.8	4.4	3.8	3.7	3.8	8.5	13.7	14.1
National anthem	4.4	3.6	4.6	3.0	4.0	5.3	5.0	5.8	8.9	13.9	13.0
People's Liberation Army	30.3	10.9	9.3	8.5	10.9	7.5	8.8	10.1	18.0	26.7	24.9
Putonghua	3.4	2.6	2.8	1.7	3.6	1.8	3.3	7.3	11.8	16.2	17.7
Great Wall	1.3	0.3	1.3	1.7	1.2	1.6	2.0	2.4	3.5	5.4	4.2

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This was also reflected in the growing perceptual divide between Hongkongers and mainlanders, as the former see the latter as more and more distanced from them. In the period

2010-2016 Hongkongers saw an increasing gap between themselves and their mainland counterparts across every dimension measured, with civil liberties, i.e., press freedom, freedom of speech, equal opportunities, registering the largest and most consistent divergence (Fung & Chan, 2017). By 2016, the average perceived distance on civil liberties stood at 1.69 on a 5-point scale, showing a substantial differentiation between two groups which comprise the same nation and ethnic group.

Table 3. China–Hong Kong cultural distance perceived by respondents.

	2016	2014	2012	2010
Civil liberties				
Emphasis on press freedom	1.97	2.14	1.90	1.77
Emphasis on freedom of speech	1.88	2.06	1.83	1.72
Emphasis on equal opportunities	1.61	1.81	1.76	1.62
Emphasis on privacy	1.55	1.61	1.63	1.48
Outspoken and vocal	1.41	1.77	1.55	1.39
Average	1.69	1.88	1.74	1.60
Cronbach’s alpha	0.83	0.83	0.79	0.79
Civil qualities				
Self-disciplined	1.62	1.84	1.86	1.67
Compassionate	1.39	1.67	1.66	1.39
Independent thinker	1.07	1.22	1.17	0.88
Socially conscientious	0.98	1.32	1.01	0.85
Open-minded	0.85	1.10	1.02	0.89
Interested in public affairs	0.83	1.07	0.86	0.66
Average	1.12	1.37	1.26	1.06
Cronbach’s alpha	0.84	0.82	0.79	0.78
Competitiveness				
Adaptable to environment	0.72	0.79	0.80	0.70
Enduring	0.64	0.73	0.62	0.43
Smart	0.56	0.63	0.62	0.59
Pragmatic	0.40	0.34	0.40	0.52
Progressive	0.07	0.29	0.32	0.32
Optimistic	-0.15	0.28	0.17	0.13
Average	0.37	0.51	0.49	0.45

Cronbach's alpha	0.74	0.73	0.66	0.73

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The change in Hongkonger identity negatively reflected on local views of Mainland culture and values, namely authoritarianism, lack of civic awareness, and disregard for individual rights, which came to be actively seen as a threat to what Hongkongers understood as their way of life rooted in liberal democracy (Fung & Chan, 2017). This tendency is reflected in the PEW research which found that a total of 70% of Hong Kong citizens view the Mainland as a threat, with those considering themselves as *primarily a Hongkonger* more likely to characterize it as a "major threat" (Corichi & Huang, 2023). Furthermore, those who primarily identify as a Hongkonger tend to be much more dissatisfied with the state of Hong Kong today (36%) compared to their Chinese-identifying counterparts whose satisfaction (59%) is almost six times their dissatisfaction (10%) (Corichi & Huang, 2023). This demonstrates that identity and perception of China are correlated and have come to define how the SAR's population looks at the Mainland, especially considering the tightening of the central government's grip on policy in the city.

In conclusion, this section argued and explained the connection between the newly redefined Hongkonger identity, associated with civil liberties, and the growing antagonistic view of locals towards the Mainland. The difference between one's desire for democracy and freedom of speech faced opposition from the tightening grip of the central government and the authoritarian regime in place. This contrast was reflected in the growing distancing of Hongkongers from the national *Chinese* identity, their increased resistance to national emotive icons associated with "statist China", and the substantial gap in the perception of their surroundings, including the Mainland as a threat.

5 Discussion and Limitations

What emerges from both dimensions of analysis is a self-reinforcing relationship between identity and perception. The stronger one's identification as Hongkonger is, the more likely they are to perceive the mainland as a threat, and the higher the level of threat one is conscious of, the stronger one's identification as a form of resistance is. This is especially pronounced among the young generation which predominantly identify as Hongkonger and demonstrate the most hostile attitudes towards China.

The National Security Law (NSL), passed in June 2020, only further reinforced this trajectory (Maizland & Fong, 2026). Article 23 of the *Basic Law of the Hong Kong Special Administrative Region of the People's Republic of China* had long required Hong Kong to enact laws prohibiting all "act[s] of treason, secession, sedition, [and] subversion against the Central People's Government", but it was only when Beijing imposed the NSL directly via the NPC Standing Committee, bypassing Hong Kong's own legislature, that human rights and freedoms became truly endangered (Basic Law, 1990, art. 23; Dapiran, 2021; National

Security Law, 2020). The law was largely seen as a crackdown on the civil liberties unique to Hong Kong and allowed for the arrest and prosecution of hundreds of individuals who were part of the democratic movements only several months ago (Dapiran, 2021; Lo, 2021). Many of those who had led or participated in the 2019 social movement either emigrated, supporting the brain drain documented in the analysis above, or faced prosecution (Leung, 2023; Lo, 2021). Consequently, true political expression has come to be more precarious and self-censoring, leading to doubts over the continuity of Hongkonger identification as a dilemma between becoming a dissident and remaining silent, and its potential move from being openly expressed to being privately held. The available evidence, including the sustained pace of emigration and the continued dominance of Hongkonger identification in post-NSL polling, suggests the latter is more likely (Corichi & Huang, 2023).

Several limitations of this paper should be acknowledged. First, this paper is primarily focused on the period 2010-2019 which means that the consequences of the National Security Law and the continued strengthening of the central government’s grip over Hong Kong post-Covid require further academic attention and analysis. Second, the Lee (2024) study covers all highly-skilled immigrants rather than mainland arrivals exclusively which limits the applicability of its results. Finally, the paper’s reliance on self-reported statistical data means that the accuracy and authenticity of the outcomes and conclusions rests on the alignment between people’s declared beliefs and attitudes and their actions in real life.

6 Conclusion

This paper has sought to explain the development of anti-mainland sentiment in Hong Kong by looking at the different dimensions of the growing divide between the two groups: first, the perceived demographic threat of mainland migration and then the construction of a distinct civic Hongkonger identity in opposition to mainland political culture. Both of these have served as a way to draw a line between the shared ethnic belonging and the disputed civic identity which is in conflict with what the mainland represents.

The demographic dimension shows how the fears of overcrowding, lack of housing, strain on public resources and the labor market contribute to a growing antipathy towards immigration. This has come to affect both highly-skilled migrants, typically welcomed in receiving countries, and ‘double not’ children who are forced to deal with exclusion and inequality. On the other hand, the identity dimension reveals that the growing antagonism is not a form of ethnic nationalism, but rather civic nationalism, deeply rooted in liberal democratic values.

What emerges from both dimensions is a circular relationship between identity and perception. The stronger one's identification as Hongkonger, the more likely one is to perceive China as a threat and the more threatened one feels, the more one invests in that identity as a form of resistance. This dynamic shows that the process follows a self-reinforcing path, most pronounced among the younger generations which also lead the polls in Hongkonger identification and hostile perception of the mainland.

Future research should consider the implications of the 2020 National Security Law, which was only partially touched upon here, on the outlined dynamic. Furthermore, the events post-Covid also deserve academic attention since the central government in Beijing was able to strengthen its grip on the dissenting movements which came to characterize 2019-2020, thus it is important to consider whether the public discontent moved from being openly expressed on the streets to the shadow of personal life. In that way, scholars would be able to gain an understanding of Sino-Hong Kong relations in a much more comprehensive way.

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LIVING SYNCRETISM:

How the Heritage of Somapura Mahavihara Actively Influences Local Identity in Paharpur

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Abstract

This paper explores the heritage of Somapura Mahavihara in Paharpur, Bangladesh, and its impact on contemporary local identities. The paper rebuts traditional historiography and heritage conservation that frame the site as merely a Buddhist relic. Based on the lived religion approach, the paper studies a mix of traditional academic sources and contemporary grey literature with in-depth interviews and surveys to explore the heritage deeply, aiming to find the full picture of this complex site. The study uncovers the syncretic cultural-religious transitions of the region by studying the site extensively from its 8th-century founding to today, emphasising how these syncretic transitions helped shape the local identity today, with mythical practices and local deities revered by both Hindus and Muslims alike. The paper argues that state-led heritage conservation, adopting the "Authorised Heritage Discourse" approach, has prioritised physical preservation at the expense of cultural preservation, harming locals in the process. Nevertheless, the paper argues that local identity lives on despite such challenges.

Keywords: Somapura Mahavihara, Bangladesh Heritage, Heritage Conservation, Lived Religion, Authorised Heritage Discourse

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1 Introduction

From state-sponsored signboards, one would view Somapura Mahavihara as a relic of a bygone Buddhist empire. Yet, beyond this official façade, the sounds of prayers by locals who bypass these buffer zones reveal a vastly different reality: a living, breathing sanctuary sustained by a vibrant collision of Hindu, Islamic, and folk traditions (Eshika, 2023, p. 151).

Somapura Mahavihara is located in the village of Paharpur within the Naogaon district of modern-day Bangladesh (Sen, 2018, pp. 351–352). The site was part of a network of five major Mahaviharas—grand Buddhist monasteries—and was celebrated by pilgrims as one of the most sacred sites of the East (Sen, 2018, pp. 351–352). Designated a UNESCO World Heritage site in 1985, it is recognised as one of the Indian subcontinent's most magnificent archaeological monuments (Sen, 2018, pp. 351–352). As a pinnacle of the Pala dynasty (an imperial Buddhist power that ruled the Bengal region from the 8th to 12th centuries) and a masterclass in pre-Islamic Bengali architecture, it profoundly influenced later monumental structures across Southeast Asia, such as Cambodia's Angkor Wat (Kumar, 2024, p. 762).

The massive Mahavihara is centred around a towering, terraced shrine with a distinctive cruciform floor plan, with the central shrine surrounded by a vast walled quadrangle which houses 177 individual monastic cells and is richly adorned with thousands of intricate terracotta plaques. The Mahavihara is believed to have been formally established on top of an earlier temple, in the late 8th or early 9th century, under the royal patronage of the Pala Emperor Dharmapala (Sen, 2018, pp. 363–364; Sen et al., 2014, pp. 57–58). The monument thrived from the 9th to 11th centuries—a period that saw religious development and the construction of a smaller structure nearby, the Tara Temple, that would later leave a remarkable syncretic legacy (Prasad, 2021, pp. 522–526, 548). However, it later endured significant turbulence, notably an 11th-century attack and burning by the Vangala army of King Jatavarma, before being extensively restored in the 12th century by the monk Vipulasrimitra (Prasad, 2021, pp. 522–526, 548). Later, the site gradually declined due to severe flooding, shifting river courses, and the loss of royal patronage, with a small monastic presence lingering until the 14th or 15th centuries before fully being abandoned (Prasad, 2021, pp. 522–526, 548). Centuries later, the vegetation-covered ruins were first documented by Buchanan Hamilton between 1807 and 1812 (Prasad, 2021, pp. 522–526, 548).

Somapura Mahavihara is, today, viewed mostly as an ancient Buddhist monument. This is influenced by many factors, beginning with the traditional historiography of India by colonial actors. Since James Mill’s 1817 work 'History of British India' rigidly divided the region's past into 'Hindu,' 'Muslim,' and 'British' eras, South Asian heritage has routinely been viewed through this compartmentalised lens (Mill, 1817). Furthermore, with the colonial conservation methods spearheaded by the Archaeological Survey of India (ASI), this compartmentalised view has been structurally embedded into the documentation and preservation of such sites (Guha-Thakurta, 1998, pp. 30–40). Guided by the principles outlined in John Marshall’s 1922 Manual of Conservation, the ASI institutionalised an Authorised Heritage Discourse (AHD) (Smith, 2006, pp. 11–29). This material-based approach prioritises the aesthetic preservation of monuments, “freezing” them in time as relics rather than living heritage (Smith, 2006, pp. 11–29). With this perspective, initial excavations highlighted the site's value as a lost Buddhist heritage, its visual value, and its influence in the region, but neglected the local socio-cultural impacts delivered by the site and the living worship taking place to this day (Sen et al., 2014, p. 49).

These frameworks established a methodological legacy that continues to dictate South Asian archaeology to this day, as institutional practices are built upon the 19th-century foundations (Hawkes, 2014, pp. 61–72). Furthermore, since the independence of Bangladesh in 1971, the dominant competing nationalisms—secular Bengali nationalism and Islamic Bangladeshi nationalism—have both influenced the government to intentionally maintain Somapura Mahavihara's status as a dead relic, albeit for different ideological reasons (Uddin, 2006, pp. 114–117; Sen et al., 2006, p. 79). Bengali nationalism emphasises the site's historical coexistence with Hinduism, utilising it as a trophy of the past of multi-religious tolerance to promote a secular state identity and therefore overlooking the site's present-day value (Sen et al., 2006, p. 87). Conversely, Bangladeshi nationalism approaches the site through an Islamic lens; it admires the Mahavihara strictly for its architectural and visual value, positioning it as an asset for global tourism and archaeological study while actively suppressing contemporary non-Muslim claims to the space. Serving their interests, they intentionally prevent discussions of practices or culture that are part of the locals' present-day belief systems, as it undermines orthodox Islamism (Sen et al., 2006, pp. 90–92). Consequently, the state-led conservation efforts have consistently followed AHD.

Crucially, all periods of rulership demonstrated a level of cherry-picking of archaeological and historical evidence: colonial rulers neglected the sources suggesting the coexistence of religions, Bengali nationalist rulers avoided acknowledging religious conflicts, and Bangladeshi nationalist rulers avoided evidence of the Muslim locals worshipping other deities at the site (Sen et al., 2006, pp. 78, 87, 90–92). Indeed, these official historical narratives have been written with the purpose of discourse-shaping and do not sufficiently reflect the full picture of the site (Sen et al., 2006, pp. 76–79).

2 Literature Review & Methodology

For many decades, literature has been focused on the physical construction, ancient patronage, and structural preservation of the Mahavihara, under a top-down view of its ancient religious landscape (Prasad, 2021; Choudhury, 2022). Contrastingly, current studies adopt more localised methodologies, directly addressing the gap in the traditional historiography of Somapura Mahavihara. Such works have delved into a more complex history of the site, revealing complexities of the site's ancient development and its influence on the nearby people through modern archaeological and epigraphic evidence (Sen et al., 2014; Sen, 2018). Furthermore, contemporary scholarship has emphasised the site's modern sociopolitical utility and the tensions between heritage conservation and the locals (Sen et al., 2006). Consequently, recent literature increasingly positions the Mahavihara not merely as a dead architectural monument, but as a highly contested space where the state's secular, nationalistic agendas collide with the fluid religious frontiers of rural Bengal (Bhardwaj, 2011). To truly capture the site's ongoing cultural legacy, contemporary researchers are now advocating for alternative archaeological approaches that prioritise local, non-elite community management and the lived, syncretic traditions of the grassroots population (Sen et al., 2014; Eshika, 2023). An analysis of “official narratives” promoted by the government also uncovers clear tensions between local culture and official conservation measures, which contemporary research shows to have been circumvented by the locals (Antiquities Act, 1968; UNESCO, n.d.).

Current literature is scattered in research directions, and there exists a gap in answering how the lived experiences and identities of the locals have changed, given the recent advancements of national conservation actions. Consequently, this paper examines the following question: To what extent has the syncretic heritage of the Somapura Mahavihara shaped contemporary local identities in Paharpur, Bangladesh, despite tensions with nationalistic narratives?

Given the academic consensus that Bengali religion evolved through fluid syncretism, this text adopts the Lived Religion Approach (LRA) as explained in Hall (1997) to answer the research question by analysing the role of religion in influencing culture and traditions (Prasad, 2021, pp. 7–10). In the LRA, rather than solely focusing on official doctrines or written rules, religion is understood based on how people actually practise and experience their beliefs (Hall, 1997, p. xi). Applying this lens, this paper draws upon a diverse corpus of archaeological and historical evidence. To accurately capture the site's complex ongoing socio-cultural dynamics, this paper reviews consensus academic scholarship and addresses research gaps by using data from grey literature and local field reports. While acknowledging that these non-traditional sources may contain inherent biases, their inclusion is vital; they provide primary data—such as grassroots interviews and community surveys—that are essential for constructing a comprehensive and realistic view of Paharpur’s contemporary local landscape.

This paper argues that Somapura Mahavihara is an active living site of worship. Despite tensions with nationalistic goals, its syncretic heritage has cultivated a unique cultural-religious identity for nearby inhabitants that blends various faiths and folk traditions. This paper will first trace the historical development of the site's inherently syncretic heritage and how it shaped the current local identity. It will then explore how state-led, nationalistic conservation strategies have actively suppressed this living heritage, and conclude by examining how local identities have resiliently persisted in Paharpur.

3 The Syncretic Foundations

Viewing the archaeological history of the site through the Lived Religion Approach reveals that the Mahavihara's physical foundations were inherently syncretic. Modern excavations reveal that the Mahavihara was built directly over an older brick structure whose origins remain fiercely debated (Sen, 2018, p. 363). Based on 5th-century copper plates found nearby, early scholars hypothesised these buried ruins belonged to a Gupta-era Jain vihara (Sen, 2018, p. 364). Others argued they formed an unfinished Hindu temple or an earlier Buddhist edifice (Sen, 2018, p. 364). However, recent pottery dating has rewritten this timeline, placing the original structure in the 7th or 8th century and ruling out the older Gupta claims (Sen et al., 2014, p. 58). Ultimately, this means the Pala builders did not start with a blank slate; they constructed their massive monastery right over the ruins of—or possibly by actively destroying—an older sacred site, demonstrating syncretism from its very foundations (Sen et al., 2014, p. 58).

This syncretism carried on and shifted with time. The Mahavihara continuously expanded over the next decades, driven by sovereign royal decrees as well as active patronage from subordinate rulers who used religious donations to augment their own political authority (Furui, 2023, p. 107). An example is recorded in the Indian Museum Copper Plate inscription of Dharmapala (Year 26), where a subordinate ruler successfully petitioned the emperor for tax-free land grants to support a vihārikā (a small monastery) and a gaṅdhakuṭi (a perfume chamber) that they had personally added to the Somapura Mahavihara complex (Prasad, 2021, p. 420). Indeed, Somapura Mahavihara was not built overnight as a single, isolated monument, but was rather a complex establishment continually shaped by multiple patrons over time, laying the foundations for its evolving religious syncretism that is as complex as it is today.

From its inception, the Mahavihara's architecture and iconography reflected a profound religious syncretism. The thousands of terracotta plaques primarily decorating the exterior walls of the central shrine featured mostly non-Buddhist motifs, predominantly secular, indigenous, or Brahmanical (early Hindu belief characterised by the authority of the Vedas and the Brahman class), and were only 3.81% Buddhist (Alam, 2004, p. 25). Similarly, the 63 stone sculptures embellished to the basement wall of the central cruciform shrine are overwhelmingly Brahmanical or secular, with just one Buddhist deity, the Bodhisattva Padmapani, at the centre (Sen, 2018, p. 359). Previous research suggests that the monastic authorities may have engaged in a practice of "subordinate integration," incorporating local Hindu gods and secular folk motifs into the base levels to act as a 'proto-Mandala'—absorbing the motifs as early-stage Buddhist figures (Prasad, 2021, pp. 556–558). In doing so, they accommodated the fluid religious landscape of the region while ensuring that Buddhist symbolism maintained supreme conceptuality (Prasad, 2021, pp. 556–558). Evidently, religious syncretism is a crucial feature of Mahavihara and has been integrated cautiously and uniquely, representing the balance between social concession and strong religious belief.

4 The Developing Syncretic Heritage

After a golden period since its founding, during the 10th-11th centuries, Somapura Mahavihara underwent profound structural and theological transformations as the monastic authorities reacted to the unintended consequences of their earlier religious syncretism by adopting more esoteric religious practices. The "subordinate integration" of Brahmanical stone sculptures became a threat in the long term, causing the penetration of Brahmanism into the ritual life of the establishment and blurring the ritual boundaries between Buddhism and Brahmanism (Prasad, 2021, pp. 559–560). The monks had ultimately decided that these Hindu reliefs were damaging to their worship; hence, to safeguard the monument's core Buddhist identity, the monks initiated a physical backlash against these unnecessary Hindu reliefs (Prasad, 2021, pp. 559–560). The monastic courtyard was intentionally filled up with earth, raising the ground level and effectively burying the Brahmanical stone sculptures on the basement wall and rendering them almost entirely invisible (Prasad, 2021, pp. 559–560).

Simultaneously, the religious practices of the resident monks shifted into esoteric Tantric Buddhism, a highly ritualistic and mystical form of Buddhism that was popularised in the 7th-12th century era (Prasad, 2021, pp. 540–542). Due to the tantric practice of "deification of monks," at least 92 of the monastery's 177 living cells were structurally converted into private worship chambers equipped with large masonry pedestals, used for monks to practise isolated meditation to train themselves to "perceive themselves and act as Buddhas" (Prasad, 2021, pp. 540–542). However, due to this conversion, the reduced number of living cells reduced the residential capacity, causing the monk population to drop significantly at the site (Sen et al., 2014, p. 69).

As the elite monks shifted to private cells, the common lay devotees were excluded from worship at the site. Consequently, a smaller structure named "Tara Temple" and later "Shattyapir Bhita" (Home of Shattyapir) was built about 300 metres from the walls of the Mahavihara around the 10th century. Although its builder remains unknown, the structure served as the hub of devotion for the common, non-monastic population (Prasad, 2021, pp. 522–526, 548). The temple is dedicated to the Buddhist goddess Shitatapatra Tara and became a very popular temple among commoners, with 132 structural votive stupas of various sizes left in its courtyard by visiting devotees, as it was highly accessible, unlike the main complex (Prasad, 2021, p. 522; Eshika, 2023, pp. 150–154). As the goddess Tara was explicitly revered as a "saviour deity" capable of eradicating earthly dangers, devotion there was mostly for everyday magical and worldly needs of ordinary people rather than strict Buddhist philosophy (Prasad, 2021, p. 542).

During the 11th and 12th centuries, Somapura Mahavihara faced significant turbulence. Unlike earlier historical assumptions that the site was destroyed and abandoned due to Turkish invasions, the site actually endured at least two attacks even before the arrival of Turkic forces (Sen, 2018, p. 372). Notably, the Varman ruler King Jatavarma, whose dynasty was hostile to Buddhism, attacked and burned the Mahavihara, believed to be around the mid-11th century, according to an inscription on palaeographic ground in the 12th century and confirmed by archaeological evidence of ash and charred wood (Sen, 2018, pp. 366–367). However, following these initial destructions, the site was rebuilt in the 12th century by a prominent Buddhist monk named Vipulaśrīmitra according to a stone inscription bearing his name (Sen et al., 2014, p. 59).

After the Turkish Islamic rule in Bengal was established in the 13th century, the site did not end with an abrupt war. Instead, it steadily declined due to various reasons: the lack of royal patronage and lack of grassroots support, leading to a total collapse of funding needed to maintain a monastery (Prasad, 2021, p. 18). Furthermore, environmental instabilities characterised by frequent floods led to problems with waterlogging, which made maintenance of the site difficult (Sen et al., 2014, p. 70).

5 The Impact on Present-Day Society and Culture

Following the collapse of the monastery—the anchors of somewhat Buddhist orthodoxy—the Buddhist practices remaining in the nearby region did not disappear; instead, they underwent a cultural evolution, being integrated into local Hindu and Islamic folk cults (Prasad, 2021, p.

613). Interestingly, however, this has created unique local syncretic folk religions and beliefs. The goddess Tara, namely, morphed into the folk figure of Shattyapir, revered simultaneously as a Muslim Pir (saint) by the Muslims and the Hindu deity Shattyanarayan, an incarnation of Vishnu, by the Hindus (Eshika, 2023, pp. 148–149, 163). Despite the difference in religion, the beliefs and rituals surrounding this figure are nearly identical, showcasing the syncretic belief system (Eshika, 2023, p. 153).

Furthermore, the esoteric Sahajayana Buddhist practices (a branch of tantrism emphasising a natural, unforced path to spirituality over formal rituals) of the Mahavihara, which focused on the scientific exploration of the human body for spiritual upliftment while rejecting traditional deities and orthodox religious rituals, blended with Islamic Sufism—the mystical, inward-facing tradition of Islam—to give birth to Bauls, a sect of wandering philosophers and musicians (Eshika, 2023, p. 108). Bauls reject orthodox religious dogmas and instead practise mysticism with a focus on humanity, love, and achieving a connection with the ultimate truth, which they believe to be residing within one's own body (Eshika, 2023, p. 108). Moreover, the more accessible elements of Vajrayana Buddhism—a branch with many rituals—practised at the Mahavihara, like magic and sorcery, had spread to the masses and evolved to form a local belief in magic and mysticism (Eshika, 2023, p. 219). Some practices like magical healing using mystical chants remain practised today by local Muslim pirs (Sufi spiritual guides) and Hindu ojhas (traditional folk healers or shamans) alike, showing a continuation of the religious beliefs developed at the Mahavihara (Eshika, 2023, p. 166).

These syncretic beliefs remain practised today, evidencing the Mahavihara's legacy in local identity. At Shattyapir Bhita, local Muslims and Hindus alike still offer Shinni (uncooked devotional food) to Shattyapir, seeking protection and the fulfilment of worldly desires (Eshika, 2023, pp. 153–154). Similarly, when locals fall ill, both Muslim pirs and Hindu ojhas continue to use mystical chants to cure them and protect them against evil spirits (Eshika, 2023, p. 166).

6 The Impact of State-Led Conservation on Living Heritage

After centuries of abandonment, the vegetation-covered ruins were first documented by the geographer Francis Buchanan between 1807 and 1812 (Eshika, 2023, p. 138). It later joined the list of protected archaeological sites in 1919, and excavations of the site began from 1934 onwards and continued through the British, Pakistan (1949 onwards), and Bangladesh (1971 onwards) periods, and was recognised as a UNESCO World Heritage Site in 1985 (Eshika, 2023, p. 138).

Till this day, the Department of Archaeology (DOA) in Bangladesh follows the 1968 Antiquities Act, which continues to adhere to the fundamentals from the colonial times as outlined in the 1922 Marshall Conservation Manual (Eshika, 2023, p. 138). This means that from the colonial times till now, conservation of Somapura Mahavihara remains reliant on an approach of "Authorised Heritage Discourse" (AHD) (Eshika, 2023, p. 225). Furthermore, since 1985, the site's preservation has faced the additional scrutiny of UNESCO under its 1972 World Heritage Convention, which, developed under the same Western ideological foundations, further promoted the AHD approach.

Consequently, during all periods, the study and conservation of the site has been rigidly top-down under the influence of political objectives like nationalism, though by different actors (Sen et al., 2006, p. 79). This method of conservation focuses almost entirely on the aesthetic, physical, and architectural preservation of a monument, emphasising only the most grand sites (Smith, 2006, p. 19). Such conservation efforts, regardless of the specific political purpose, have sought to keep the site as a "dead" relic carefully protected for tourists' visual appreciation. Consequently, this framework harms the locals' rights to continue their worship and lives, preventing the preservation of local cultural heritage by prioritising the maintenance of the building and a standardised narrative.

Because Somapura Mahavihara was declared a state-owned immovable antiquity, Section 18 of the Antiquities Act mandates that it cannot be used for purposes "other than that directly related to its administration or preservation" (Antiquities Act, 1968, section 18). Thus, locals have been stripped of their right to perform religious rituals or even use the graveyard (Sen et al., 2006, p. 85). Similarly, local Baul mystics are forbidden from performing inside the monastery walls without special approval (Eshika, 2023, p. 231).

As argued by Smith, AHD is an inherently exclusionary framework. By being reliant on the knowledge claims of technical experts, it frames the "official" narrative as the objective and correct version, in a way delegitimising all other narratives, like those from locals (Sen et al., 2006, p. 94). For example, according to the DOA officers, the historical existence of Shattyapir is unreal and need not be researched despite the potent local myths (Eshika, 2023, p. 151). There are attempts to involve the community, but they have largely been superficial, acknowledging local myths but demanding that the locals assimilate into the official narratives rather than truly allowing them to celebrate their own culture. For example, a UNESCO project attempted to engage locals by training them to replicate the 8th-century terracotta plaques to sell as tourist souvenirs, even though the locals did not practise terracotta art (Eshika, 2023, p. 227). Similarly, local Baul musicians and indigenous women are specifically brought into the complex to perform dances and music for foreign tourists staying overnight (Eshika, 2023, p. 195).

Somapura Mahavihara has been integrated into the daily life for the locals living in adjacent villages, not just for their faith, but as a large courtyard which they use for leisure and sustenance, like to feed cattle, dry rice, etc. (Eshika, 2023, pp. 198–199). Yet, in 2012, a boundary wall and ticketing system were implemented at the site, removing locals' free access to the site. Furthermore, in 2016, due to UNESCO's strict conservation requirements, further primary and secondary buffer zones were set up at Somapura Mahavihara to protect the physical integrity from environmental and human threats (UNESCO, n.d.; Eshika, 2023, p. 196). To enforce this, 34 households (approximately 200 people) were forcibly relocated from a nearby village, severing their connection with the vihara, which they called home and causing significant psychological distress to them (Eshika, 2023, pp. 197–201).

7 The Local Resilience

Since the 2012 walls were erected, villagers have routinely bypassed ticket-purchasing by wall-hopping or sneaking through intentionally maintained holes in the fences without any fear because they see the site as their own sacred and communal land (Eshika, 2023, p. 151). They continue to visit the Shattyapir Bhita to pray and make wishes, and even warn tourists not to climb ruins, seeing it as disrespectful to the deities (Eshika, 2023, p. 153).

Despite the central shrine being inaccessible, worship has continued by shifting to alternative shrines in the surrounding nature, typically under trees. For example, when locals worship other local deities such as Shannyash Thakur and Badhai Pir, they often do their rituals underneath trees, with simple idols or shrines (Eshika, 2023, pp. 183, 213). In this manner, they continue their worship devoutly despite the regulations' attempts to prevent them from doing so. Similarly, Baul mystics continue their performances outside the complex or invite visitors to their homes, proudly keeping their culture alive, and locals continue to practise magical healing (Eshika, 2023, p. 230).

The resilience of the local community is perhaps most evident in the actions of the 34 households forcibly relocated in 2016, as these families continue their culture and practices relating to the site (Eshika, 2023, pp. 197–201). They refuse to be fully alienated from their heritage; rather than assimilating into a detached modern lifestyle, many displaced residents frequently return to the periphery of the complex to socialise, guide pilgrims, and participate in peripheral rituals (Eshika, 2023, pp. 197–201). This has transformed the state-imposed exclusion zone into a living borderland where their community identity remains fiercely intact.

8 Conclusion

Somapura Mahavihara is more than a dormant monument; it is a living place of devotion for locals whose spiritual practices were actively shaped by this syncretic heritage.

Unlike the simplistic views of traditional colonial historiography, applying a lived religion approach reveals the true complexity of the site's history. Far more than just a Vihara, Somapura Mahavihara is a site developed with incredibly complex syncretism that has profoundly impacted the locals. Indeed, practices such as the continued and simultaneous reverence of Shattyapir by both Muslims and Hindus demonstrate how local spiritual life was actively shaped by the syncretic heritage of the site. Despite state-driven conservation strategies—designed for nationalist agendas—that limit their access to the ruins, locals continue adapting and continuing the performance of their sacred rituals through other means, allowing their culture, shaped by the Mahavihara, which they call home, to live on.

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ON DZONG ARCHITECTURE:

The Dilemmas of Conservation Policies and Cultural Heritage in Contemporary Bhutan

Asia Pacific Research Circle

Sciences Po

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Abstract

In 1982, Bhutan became part of UNESCO and has since then continued to foster preservation of culture and architecture as a major pillar of its state policy. As part of architecture is the centrality of dzong architecture, ancient “fortress-monasteries” that stand still and contribute to the uniqueness of the Bhutanese landscape and identity, even though they face increasing vulnerability. This paper aims to assess the core importance of dzong architecture as part of Bhutanese identity and comprehend the Bhutanese state’s policy as regards the latter. In the first place, through a detailed inquiry in literature, this paper provides knowledge about the “visual archaeology” of dzongs as heritage of dzongkhag governance, Buddhist religion, and Bhutanese culture. Then, it stresses the prosperity of such “propelling monuments” amid reconstruction and conservation policies and their impact on this aforementioned Bhutanese identity. In the end, it discusses the sustainability of such “vernacular architecture” and identity in light of the present incentives to modernization and the aggravation of the climate crisis in South Asia.

Keywords: Dzong architecture, Bhutanese identity, heritage conservation, vernacular architecture, sustainability

Author Note

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1 Introduction

Landlocked between India and China, the Kingdom of Bhutan, established in 1907, is at the crossroads of cultures and influences; "bhotana" means in Indian terms, the end of Tibet. As a result, the Bhutanese culture, based on a longstanding heritage, is at the core of the country's development policies since Bhutan's development policies in the 1960s (Amundsen, 2003). In that sense, Bhutan declared that cultural heritage and the value of human identity, i.e., Bhutanese identity, are a main concern in governance (Rössler et al., 2018). This statement is coherent as regards Thimphu's guidelines, not based on liberal indicators such as the Gross Domestic Product (GDP) or the Human Development Index (HDI) but on their own notion of development policies based on the Gross National Happiness (GNH). The latter is a qualitative indicator reliant on four interdependent pillars: equitable socio-economic development, environmental conservation, cultural preservation and promotion, and good governance (Schroeder, 2015). The development policies implemented are then to be witnessed in all places of governance across the country.

Thus, this paper aims to provide an analysis of the entanglement of the pillars of "good governance" and "cultural preservation and promotion" at the level of *dzongkhag* (district). The latter are the administrative backbone of Bhutan as a devolution of power: the territory is split into 20 dzongkhags that oversee 205 *gewogs* (villages) in total. The dzongkhags are not only an abstract administrative regulation, but also an institution of governance, part of the "holy Bhutanese triad" of *dzongkhags* (district), *dzong* (monument), and *Dzongkha* (language of Bhutan) (Amundsen, 2001: 24). Therefore, they are literally grounded in their grassroots foundations that are the *dzongs*, depicted as "Bhutan's tour de force" as "it represents Bhutan's archetype of public political and collective" (Dujardin, 2000: 151). The *dzongs* are fortress-like buildings that incorporate both monastic quarters, and civil district administration (Amundsen, 2001). Therefore, they all encompass a *dzongchung* (little fortress), a *gorikha* (entrance port), a *dohsen* (courtyard), and a *utse* (six-storied central tower) (Dujardin, 2000). This architecture and layout in Buddhist tradition, their principles of construction, derive from *mandala* and geomancy. The architecture is thus seen in a holistic perspective of religious, political, sociocultural, and technical aspects (Amundsen, 2001); dzongs embody this perspective. Therefore, they are inherently a relevant tool of the Bhutanese domestic policy to foster national identity and a crucial element for its economic condition in the international economy—as the GNH-based governance is not reliant on GDP nor international trade. Nonetheless, there is a tension here regarding the conservation policies addressed to dzongs by Bhutan: in order to cultivate an identity, the monuments need to be in accordance with the latter; therefore, there is a need to mature; in order to create a unique narrative of the Bhutanese nation for the international public, the monuments need to be frozen in an ideational "Bhutanese" culture. Thus, how has Bhutan been equilibrating dzong conservation policies in order to enhance governance? This paper will argue that since the creation of Bhutan, dzongs have been the embodiment of political and religious domination of Drukpa Buddhism on the rural population through symbolic and cultural mechanisms. It will be demonstrated that these mechanisms were enforced to marginalize linguistic and ethnic minorities by constituting dzongs as "propelling monuments" which advantaged domestic policies but undermined the idea of the authenticity of Bhutan. This authenticity is also to be pushed by modernization, tourism, and environmental concerns, implying a tradeoff between change and authenticity.

This paper advances the argument that since the 17^{th} Century, *dzong* architecture has served not only as heritage, but a political instrument used by the Bhutanese elite for state-building, making a national identity rooted in Drukpa Buddhist culture emerge. Nowadays, the conservation policies still marginalize ethnic and linguistic minorities, respond to international norms among incentives for modernization and climate change.

2 Literature Review / Theoretical Framework

The scholarly literature on Bhutanese heritage includes mostly architectural history, political anthropology and conservation studies, drawing on substantive but limited theory and literature.

2.1 Dzong Architecture, Governance, and Cultural Continuity

This topic is primarily and foundationally covered by Amundsen (2001, 2003) whose research is the most comprehensive as of architectural and historical account of dzong as cultural and historical monuments. The scholar traces the emergence of dzong in the 17^{th} Century under Ngawang Namgyal. Dujardin (2000) complements this perspective by introducing Rossi's notion of "propelling monuments" to the Bhutanese context, arguing that dzongs transcend their historical origins by continuously absorbing new political and cultural functions in contemporary society. Together, these two authors establish the theoretical ground for understanding dzongs not as frozen relics but as dynamic, living institutions. Frenchman et al. (2010) extend this architectural focus toward urban planning, examining how historic districts might serve as an alternative conservation framework, though their analysis remains largely technocratic and insufficiently attentive to the political dimensions of heritage management.

2.2 Research Gap

Despite these few contributions in the English-speaking academia, there is still a major research gap persisting. The present literature tends to overstate the architectural political and environmental dimensions of dzong heritage separately rather than in an interconnected manner. To this day, no major work has ever integrated these issues under a single unified framework. This paper therefore positions itself at the intersection of these gaps, proposing a critical reading of dzong conservation policy that is simultaneously architectural, political, and environmental in scope.

3 Methodology

I propose to depict this topic through the lenses of “visual archaeology,” that is, to compare the change in perception of these buildings according to the image people have about the monuments (Amundsen, 2001). This perspective needs to trace the history of the construction of dzongs back to the emergence of Bhutan as a “nation” in the words of Amundsen—that is rather an official assertion of political domination. On top of this innovative methodology, this paper will be mainly based on secondary source literature.

4 Analysis and Findings

4.1 A "Visual Archaeology": Historical Retrospective of Dzongs in Constructing the Bhutanese Governance

In the first place, I argue that dzongs are at the core of Bhutanese governance as places that have been asserting political and Buddhist domination—the well-known concept of *chos srid gzhung brel,* the harmonious blend of religion and politics—and constituting a common cultural center at the core of the continuity of the culture. In the 17th century, Ngawang Namgyal unified Bhutan through military conquest, and established the code of law and the administrative dzong system. The state-building process was complicated, implying internal resistance from marginal Buddhist schools and raids from Tibet. Thus, the newly created Bhutanese state needed a surplus of wealth to oppose such threats that it sought in the imposition of taxes over large territories, therefore administration (Amundsen, 2001). The dzongs reflect this, as an evocation of medieval culture and strategies of conquest (Dujardin, 2000). In order to maintain order in these regions, Ngawang Namgyal, issued from the Drukpa Kargyud school of Tibetan Buddhism—Vajrayana Buddhism, a tantric form of Mahayana Buddhism—introduced monasteries coupled with civil administration in the same place. The dzongs were therefore planned for the monastic life of Buddhist monks under the ruling of the Je Khenpo, the state of monks that would be on equal footing with the King himself (Amundsen, 2001). This alliance of politics and religion definitely had a purpose beyond mere administration: it was to crack down on the other marginal Buddhist school, the Nyingma tradition that was more developed in the central and east regions, yet also minorities in the south, such as the Hindu minority coming from India (Amundsen, 2001).

In that sense, I argue that the dzongs were a central controlling institution for rural regions—that mostly constitute the lands of Bhutan—and consequently a center for material culture and continuity in the country's historical landscape. This is highly relevant in the pattern of the "typical" Bhutanese village: from clustered villages to dispersed settlements in valleys, dominated by a *lhakhang*—the local devolution of Drukpa Kargyud Buddhist power—itself placed below a larger dzong in the mountain. Therefore, one can visibly see the paramount importance of location and architecture in the structuration of power in an area. Nonetheless, it is not only about the location: dzong had a direct impact on regulating rural living and culture. These monuments on the Himalayan peaks were locally built by a congregation of people from the valleys: work was carried out on a regular basis according to division of labor as a form of labor tax known as the *gungda ula* system (Amundsen, 2001; Dujardin, 2000). Central was the role of the master builder, known under the *zoring-lapon* or *zorig-chichop* (Dujardin, 2000); he was the main craftsman of the material culture of such areas. Amundsen even declares that it integrated innate, unconscious knowledge, quoting a Bhutanese saying: "One learned to build, just as one learned to walk" (Amundsen, 2003: 8). The master builder was the missing link that could highlight the inhabitants' connection to the *dzongs*: beyond administration, dzongs provided the perfect scenery to evoke a strong sense of cultural belonging to foster social bonds among such a dispersed community (Dujardin, 2000). The annual festivals of Tschchu and Dromchoe are instances of the central tie that *dzong* is. In the absence of foreign influence in local culture—Bhutan has never been colonized nor influenced by socialist movements as in Nepal—most of the cultural shifts that occurred were still embedded in traditional values. As a result, there is Bhutan's cultural continuity and cultural policy characterized by the thoughtful process of integrating the new with the old (Amundsen, 2001).

4.2 "Propelling monuments": The Impact of Contrasted Cultural Policies on the Bhutanese Identity

In the second place, the idea of cultural continuity implied standards of conservation and destruction proper to the idea of a "propelling monument". In doing so, it reinforced the cultural assertion of dzongs, framing it as the unique and impermanent culture of Bhutan in order to assess domination of other ethnic groups. As mentioned above, dzongs do not only represent feudal times but also present times as part of the material culture; they are still in use nowadays to accommodate political, religious, and logistic functions, with more than 1,500 monks shifting between their walls (Amundsen, 2001; Dujardin, 2000). In that matter, they can be considered as "propelling monuments" in Aldo Rossi's terms, that is to say, monuments that continue to function even in modern "urban areas, in which they stand and continue to constitute an important urban focus" (Dujardin, 2000: 169). According to Dujardin, this is due to the "Bhutanese dwelling culture" infused in Mahayana Buddhism and therefore influenced by the concept of *samsara*, the impermanent cycle of death and rebirth (Dujardin, 2000: 163). I rather assume that it is the result of the Drukpa Kargyud Buddhism's domination in Bhutan—and not the idea of a unique culture—plus the seismic vulnerability and arid climate that make dzongs vulnerable and bound to be torn down then rebuilt. As a case study, the Punakha Dzong was built by Ngawang Namgyal in the winter capital in 1637, then rebuilt several times in 1750, 1798, 1802, 1831, and 1849 after fires, then reemerged from the ground after an earthquake in 1897 (Dujardin, 2000).

This had a certain influence on the reconstruction in 1986 that went through restoration—yet the building did not need it per se (Amundsen, 2001). In that case, this decision was arbitrary, and was intended to emphasize the superiority of the Bhutanese culture" and language, both being closely related to the concept of minority in Bhutan. On the one hand, there are 21 languages in Bhutan to be enumerated, among them Bumthangkha, Kurtökha, and Khengkha, which are used by the minorities of Ngalongs, Sarchops, and other smaller communities like the Khengs, Brokpas, Doyas, and Lepchas (Pattanaik, 1998). In addition to this, there is, since the Treaty of Sinhuala in 1864—initiated by the British—the installation of Nepalese, called the Lhotshampas, another layer to the ethnic landscape of Bhutan (Pattanaik, 1998). On the other hand, the majority speaks Dzongkha and has consented to the norms imposed by the Drukpa elite from Tibet. Dzongkha literally means "the language spoken in the dzong" and was deemed as the *lingua franca* of the country right after the founding of Zhabdrung's dzongs in the 17th century (Pattanaik, 1998: 645; Amundsen, 2001) Therefore, the Bhutanese elite have clearly used dzong as an assertion of cultural hegemony of Drukpa culture. Thus, there is no coincidence that the restoration of the Punakha dzong occurred amid the 80s-90s in Bhutan, marked by a state-led rejection of Nepalese to foster national unity under the principle of GNH, that the Bhutanese uniqueness is its main asset (Pattanaik, 1998).

This principle of "Bhutanese uniqueness" is to respond to the international market of tourism, in that case cultural tourism. In the case of Bhutan, it is the "cultural landscape" that is valued under the aegis of the UNESCO. The clauses of such a term are delineated, in the 1962 Recommendation Concerning the Safeguarding of the Beauty and Character of Landscapes and Sites, as "combined works of nature and man" (Rössler et al., 2018: 3). As such, UNESCO advocates "ensuring the identification, protection, conservation, presentation and transmission to future generations" (Rössler et al., 2018: 6). This notion usually implies freezing the cultural landscape through guidelines such as site-specific training and landscape conservation treatment with regard to the insertion of new buildings. There is here a policy dilemma between a focus on maintaining domestic cultural policies for state domination through the evolution of "propelling monuments" and economic growth that requires protecting Bhutanese identity and narratives, and its unique niche tourism (Shroeder, 2015). Therefore, the Government of Bhutan has been collaborating closely with UNESCO to put forward their first UNESCO World Heritage Tentative List, drafting in 2016 the Cultural Heritage Bill of Bhutan. This bill announced that the entire country is understood as a cultural landscape, encompassing the "indigenous" people according to the cultural-historical-natural territory approach of South Asian countries (Rössler et al., 2018; Pattanaik, 1998). There are therefore issues raised about the maintenance of the "Bhutanese identity" in light of modernization and tourism: the tradeoff between "time capsule" and development opportunities (Pattanaik, 1998: 14).

4.3 A "Vernacular Architecture": Sustaining Dzong Heritage in an Era of Modernization and Environmental Crisis

In the third place, I argue that Bhutan struggles to maintain its cultural authenticity related to dzongs because of the modernization process, tourism, and environmental issues, since any of these aspects push the very traditional architectural design of dzongs. The starting point of this analysis is modernization, a process that entered the scope of Bhutan's policy in the 1970s through governmental incentives for diversification of the economy and change in the built environment (Pennacchio et al., 2020). In light of such perspectives, traditional legacy is not transmitted to the young anymore; knowledge about the architectural legacy of Bhutan is fast disappearing (Amundsen, 2001). Still, as I stressed before, the government needs to maintain its cultural uniqueness. Thereby, in the urban setting, dzong architecture is reduced to superficial and decorative imitation only applied to Western-based types of structures built with cheap material from India (Frenchman, 2010). This leads to structural absurdities according to Amundsen and a devaluation of the architectural value of Bhutanese culture, according to Frenchman (Amundsen, 2001; Frenchman, 2010). Both authors emphasize more the architectural restructuration that would be at the root of a loss in dzong heritage in contemporary Bhutan; this paper rather argues that it is the loss of practice around heritage that makes it lose its cultural significance. As a case study, the reconstruction of Taishichho between 1962 and 1969 under King Jigme Dorji Wangchuck was designed in order to suit Western norms of building and modernization: the courtyard was converted into a "plaza" with Bhutanese features (Dujardin, 2000). Since there is not much difference between a plaza and a courtyard and the Bhutanese features were conserved, one can surmise that the adaptation to Western norms was either in the structural foundation or the process of building.

Bumping on the perspective of blending monuments to Western norms, one could easily imagine that the government's conservation policies are about conserving the architectural aspects perceived as "the essence" of Bhutan—in the idea of Orientalism—for tourism while in fact westernizing them. This can be addressed through the questioning of the place of sustainable tourism in Bhutan, which, according to the United Nations World Tourism Organization (UNWTO), includes mass tourism and other niche tourism segments (Schroeder, 2015)—mass tourism seems rather incompatible with cultural protection to me, though as it would imply an increase in westernized and Western-style buildings. Bhutan's tourism policy was initiated in 1974, broadening the participation of subnational levels and private sectors so as to be acknowledged as the "last Shangri-la" of sustainable tourism (Schroeder, 2015: 16617). Its strategy relies on the selection of the tourists: by differentiation factor—cultural uniqueness and authenticity—it can fix high prices of stay with low flows. Therefore, it benefits a niche tourism that is in line with the protection of dzong monuments from westernization—still under the scope of the practice of "propelling monuments". Thus, westernization of monuments is only to respond to modernization incentives and has no ties with tourism.

Therefore, tourism in Bhutan has not been a significant issue as regards environmental matters (Schroeder, 2015). This does not mean that dzongs are not under environmental pressure: vernacular nailless architecture based on rammed earth is widespread among dzongs but vulnerable to the environment. The main environmental pressures weighing on Bhutan are the hazard of seism—magnitude of 6.1 in 2011, droughts, and fires. According to the European Microseismical Scale, they are classed in "higher vulnerability" to seism; walls also suffer from water and moist action, both increasing environmental dangers due to climate change in South Asia. There is here a convergence of risks on dzongs, as moist hazard increases seismic vulnerability by 70%. In order to protect these monuments, the government can use ring beams at each floor that will lower the vulnerability of rammed earth (Pennacchio et al., 2020). Nonetheless, this is a tradeoff between authenticity of architecture and "modernization", still at the core of the Bhutanese governance of dzongs.

5 Discussion and Limitations

Through this paper, I sought to reinterpret *dzong* architecture beyond its treatment as mere cultural heritage, but rather positioning it as a political tool used in the Bhutanese statecraft. Beyond the integration of visual archaeology and heritage studies, it has demonstrated that conservation policies were never solely technical decision but political choices deeply rooted in ethnic dominance, nationhood and international recognition.

Nonetheless, several limitations can be drawn out. The main one concerns the methodology used: the paper relies only on secondary literature. This provides indeed analytical depth, but lacks empirical analysis. Thus, primary fieldwork including input from local communities on the one hand or policymakers on the other hand could have been appreciated. A second limitation on the corpus is its restrictiveness—it is also due to the niche aspect of the topic and joins the first limitation. A broader engagement with Bhutanese-authored scholarship and grey literature could offer more perspectives as regards the matter. The question remains still relevant, but further research should prioritize participatory methodology that could envision the broader horizons of cultural heritage and ecological conservation policies in the broader Himalayan region.

6 Conclusion

This paper has discussed the impact of dzong as architectural places on the construction of Bhutanese governance and identity in light of conservation policies and the increasing hazards of modernization, tourism, and environmental risks. It has put into perspective the early creation of the dzong system as a political and religious tool for domination through the imposition of dzongs as cultural centers for dispersed communities. I have stated that this increased the government’s power to marginalize minorities so as to foster Bhutanese unity amid a rise in state coercion in the 90s. Then I have broached the limits of such domestic practices of conservation in light of UNESCO and its norms, modernization and the loss of significance in the architectural process, sustainable tourism policies, and environmental pressure implying this very tradeoff between authenticity and change. In light of all of this, Bhutan continues on its path and proves the relevance of heritage and material culture in a country’s core politics in an uncertain future.

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REGIONAL RULE OF LAW ENFORCEMENT AND THE RELEVANCE OF THE EU MODEL FOR ASEAN

Asia Pacific Research Circle

Sciences Po

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Abstract

This paper examined the extent to which the European Union's supranational institutional design can serve as a model for the Association of Southeast Asian Nations to reinforce rule-of-law commitments among its Member States. Using a comparative institutional analysis, the paper contrasted the EU's supranational enforcement mechanisms with ASEAN's intergovernmental framework, drawing on treaty texts, case law, secondary literature, and institutional documents. The analysis found that direct transplantation of EU mechanisms (such as infringement proceedings, judicial supremacy, and budgetary conditionality) is structurally incompatible with ASEAN's foundational principles of non-interference, consensus-based decision-making, and constitutional heterogeneity. However, the EU's experience provided selective insights into the value of accountability structures and incremental institutional development. The paper concluded that ASEAN can pragmatically reinforce its rule-of-law commitments by expanding its own intergovernmental acquis rather than replicating European supranationalism. Proposed adaptations included a voluntary minilateral opt-in framework inspired by enhanced cooperation logic, and an incrementally expanded mandate for the ASEAN Intergovernmental Commission on Human Rights focused on confidential assessments and reputational incentives. These reforms were found to be compatible with the ASEAN way while generating meaningful incentives for compliance.

Keywords: rule of law, ASEAN, European Union, supranationalism, intergovernmentalism

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1 Introduction

Southeast Asia and Europe have each faced tests of regional commitment to the rule of law. In Europe, concerns about systemic threats to judicial independence and other rule-of-law deficiencies in certain Member States like Hungary and Poland have prompted the activation of the European Union (EU) supranational instruments. The Association of Southeast Asian Nations (ASEAN), under its uniquely diverse context, is known for approaching the adherence of rule-of-law in the region through a more diplomatic, consensus-based route. Timor-Leste, granted accession to ASEAN after almost 14 years, had unexpectedly declared in 2023 that it might reconsider joining if the organisation could not address Myanmar's deteriorating rule-of-law situation (The Jakarta Post, 2023). It was an unusually direct call from an aspiring Member of the bloc to reinforce ASEAN's rule-of-law method without leaving behind its unique, intergovernmental "ASEAN way". It raises the question of how the two regional organisations, doctrinally committed to stability, cooperation and legal order, approach the challenge of safeguarding the rule of law under profoundly different institutional designs.

To analyse this, it is necessary to recognise that "rule of law" does not carry an identical meaning in the context of EU and ASEAN institutions. In the EU treaties, the rule of law is codified as a foundational value under article 2 TEU. It is defined by six main principles: legality, legal certainty, prohibition of the arbitrary exercise of executive power, independent and impartial courts, judicial review, separation of powers and equality before the law (European Commission, 2023). Said rule of law is operationalised through supranational mechanisms such as direct effect, supremacy, infringement actions, judicial review, and, increasingly, financial conditionality, designed to ensure the uniform application of Union law across Member States. In ASEAN, the term appears as a shared principle in the ASEAN Charter under article 1 and 2, but its operationality is rooted in an intergovernmental 'acquis' - centred on consensus and non-interference. Rather than judicial enforcement, ASEAN's approach relies on finding common ground through consensus, consultation and gradual capacity building. These are two differentiated conceptions of rule-of-law enforcement coming from two unique contexts.

This paper therefore asks: **to what extent can the EU's supranational institutional design serve as a model for ASEAN to reinforce rule-of-law commitments among Member States?** The aim is not to evaluate the EU as superior, nor to suggest that ASEAN should mimic European structures. Instead, the analysis focuses on comparing institutional design choices, what each organisation makes possible or impossible, and identifying mechanisms that could be adapted to Southeast Asia's political diversity, constitutional heterogeneity, and long-standing commitment to non-interference. Part 1 explains how ASEAN's historical conditions, constitutional diversity, and political principles produced an intergovernmental acquis that promotes without coercively enforcing rule-of-law norms, contrasting this with the EU's path toward supranational oversight. Part 2 examines selected EU mechanisms that support rule-of-law compliance and considers how ASEAN can pragmatically adapt to create a more integrated environment of accountability within the bounds of intergovernmentalism.

2 Methodology

The analysis uses qualitative comparative institutional analysis to examine the conditions under which EU rule-of-law mechanisms can be selectively adapted to ASEAN's intergovernmental context. The approach is interpretive and document-based, drawing on EU and ASEAN treaty texts, CJEU jurisprudence, EU regulations, and official institutional documentation, supplemented by secondary academic literature in international law and comparative regionalism.

3 Theoretical Framework

The framework is built around the concept of institutional compatibility: rather than evaluating the EU model as a normative benchmark, the analysis identifies which design features of EU rule-of-law mechanisms are structurally compatible with ASEAN's intergovernmental acquis and which are not. This requires treating each organisation's institutional logic, supranational delegation on the EU side and consensus-based non-interference on the ASEAN side - as a product of its distinct historical, constitutional, and political conditions rather than as a point on a common integration scale. The central question is therefore not whether ASEAN should become more like the EU, but whether specific EU mechanisms can be functionally adapted without requiring ASEAN to abandon its foundational principles without which its formation would not have been possible.

To do so, the analysis first grounds the comparison historically, tracing how each organisation's founding conditions shaped its institutional design. It then examines each organisation's approach to rule-of-law enforcement on its own terms before bringing them into direct comparison. The discussion that follows uses this comparative foundation to identify strategies for reinforcing ASEAN's rule-of-law commitments in a manner consistent with its own acquis.

4 Analysis and Findings

4.1 Distinct political conditions and foundational values that shaped ASEAN’s formation as opposed to the EU

Compared to the European Union’s relatively more homogenous constitutions sharing a lot of liberal-democratic values surrounding eccomonomic growth, ASEAN brings together States with deeply heterogeneous constitutional and political orders, ranging from socialist one-party regimes (Vietnam, Laos) to constitutional monarchies (Thailand, Cambodia), military-junta run countries (Myanmar), and presidential democracies (Indonesia, Philippines). A 2017 European Parliament study itself noted how ASEAN “encompass[es] quite heterogeneous countries, with wide demographic disparities, differing levels of economic development and divergent political systems” making it ”arguably one of the most diverse regional organisation[s]” (Nuttin, 2017). Said diversity is more than just symbolic, it creates concrete constitutional tensions when ASEAN initiatives embody economic liberalisation or legal commitments on the basis of presupposed common values that often conflict with domestic constitutional principles. The new regional order emerged against a backdrop of deep mistrust among prospective Members. Notably the territorial dispute between Malaysia and the

Philippines over Sabah, then part of North Borneo, had already undermined earlier attempts at Southeast Asian cooperation (Bernard & Yusran, n.d.).

It was also under the context of the Cold War with the Vietnam war and the SEATO alliance (anti-communist sphere of influence for the US) that ASEAN was formed in 1967 as an expression of Asian solidarity, largely to contain the spread of communism in the region (Office of the Historian, 2019; Maizland et al., 2023). However, its formation was an unlikely circumstance to begin with given the unique constitutional foundations of the different Member States. For instance, Article 33 of the 1945 Indonesian constitution enshrines a state-controlled, family-based economic model as one of the main examples of the anti-capitalist and anti-colonialist constitutional identityup. The first president of independent Indonesia, Soekarno, was seen as a sympathiser and protector of the community party, collaborating with them on the “Konfrontasi” policy of opposing the creation of the state of Malaysia (Bernard & Yusran, n.d.). Hence, when he was deposed by Soeharto in 1966, it marked a strong shift to anti-communist policies causing widespread purges and a Communist Party ban (van der Kroef, 1970). This shift allowed Indonesia to join the founding first Member States of ASEAN of largely anti-communist regimes despite the constitutional principles of Indonesia remaining largely influenced by Soekarno’s Marxist-nationalist ideology (Marhaenism) in the post-independence context. Modern critique highlights that the neo-liberal, free market, trade liberalisation policy, promoted by ASEAN through economic partnerships and free-trade agreements, “runs counter to the basic principle of the Indonesian economic ideology as contained in the country’s constitution” under Article 33, and highlights a need to revisit either its Membership in ASEAN or the “constitution so as to allow more flexibility” (Aminuddin et al., 2019; Chandra, 2011).

The heterogeneity in the political structure and perceptions of legality in ASEAN Member States further complicates the formation of any specific shared regional standard of the rule-of-law. Across Southeast Asia, States embody markedly different forms of government - ranging from constitutional monarchies, to presidential democracies, to one-party socialist regimes. For example, although Thailand is formally a constitutional monarchy, its political history is littered with repeated military coups and frequent constitutional rewriting, leading to shifting understandings of legality and rule of law in general. The contrasts between States sharpened with the accession of Vietnam and Laos in the late 1990s, both organised as communist one-party States where the ruling party directs the legislature, judiciary, and executive, embedding a conception of legality fundamentally distinct from the liberal-democracies or constitutional monarchies in ASEAN. Such divergences matter because they shape how each state interprets key normative rule-of-law concepts, such as judicial independence, through different lenses. In this context, it becomes systematically difficult to articulate any type of binding regional rule-of-law framework, since its Member States often do not even share either a common constitutional foundation or democratic trajectory.

In contrast, the logic underpinning early European integration, famously articulated in the 1950 Schuman Declaration, was that “solidarity in production” and “concrete achievements” would generate a de facto material interdependence among States, making peace and legal cooperation not only desirable but structurally unavoidable. By beginning with the European

Coal and Steel Community (ECSC), the EU's predecessors created shared economic governance that evolved in a common market needing uniform legal rules and supranational oversight as a prerequisite to function smoothly. Hence, the EU Member States were able to leverage a set of more homogenous constitutional orders to establish strong economic integration making it politically feasible to establish strong enforcement tools, such as infringement procedures and the supremacy of EU law, that later became its central instruments for upholding the rule of law across Member States. ASEAN was created amid far greater political and constitutional diversity, making it unrealistic to expect the kind of convergent legal order that enabled Europe's supranational institutions.

4.2 Intergovernmental, consensus-based approaches to rule-of-law promotion within ASEAN's institutional framework

ASEAN's institutional design constitutes its own form of acquis, built on intergovernmental decision-making, non-interference, and diplomatic consensus rather than binding legal oversight. This ASEAN acquis shapes how the organisation promotes rule-of-law norms: not through supranational enforcement, but through voluntary alignment. These features are deliberate political choices anchored in ASEAN's historical, constitutional and institutional foundations.

First, intergovernmentalism and non-interference continue to define ASEAN's operating core. Article 2 of the ASEAN Charter codifies the "principle of non-interference in the internal affairs of ASEAN Member States" and the "right of every Member State to lead its national existence free from external interference". This principle, often labelled the "ASEAN Way", channels cooperation into consultation and consensus rather than supranational constraint or intervention in domestic affairs. Even after democracy and human rights were formally added to ASEAN's principles in the 2003 Declaration of ASEAN Concord II and the 2008 Charter, non-interference remained essential. Proposals to give ASEAN bodies more intrusive mandates are made in line with the Member "States' own interests" and upholding the main, shared idea that "domestic issues should be managed domestically" (Suzuki, 2019). ASEAN acquis thus places political autonomy at the centre of regional governance, and avoids any transfer of attributes of sovereignty as is the case in the EU.

Consensus-based decision-making acts as the institutional safeguard of sovereignty within ASEAN's acquis. Article 20 of the ASEAN Charter confirms that all "decision-making shall be based on consultation and consensus". This gives every Member state a veto, preventing any move toward supranational delegation unless all governments agree. The need for consensus rule also explains why ASEAN has not established a regional court comparable to the CJEU, especially because the aforementioned constitutional and regime diversity makes it difficult to agree on common legal foundations to begin with. The post-2008 rule-of-law and human-rights architecture emerged as a balanced compromise as ASEAN integrated normative commitments while preserving intergovernmental control (Rüland, 2013). The ASEAN Intergovernmental Commission on Human Rights (AICHR), created under Article 14 of the Charter, embodies this approach with a mandate focusing on promotion, capacity-building, and dialogue instead of supranational adjudication and investigation.

From the late 1990s onwards, ASEAN gradually created institutions that could address politically sensitive or domestic issues, but always carefully framed them within the principles of non-interference and consensus. After Thailand's 1998 proposal for "flexible engagement" was rejected, ASEAN experimented with softer formats such as informal foreign ministers' retreats to discuss issues like Myanmar, the ASEAN Troika (2000) for security cooperation, and procedures under the Treaty of Amity and Cooperation's High Council (2001) for conflict settlement. The more recent 2012 ASEAN Human Rights Declaration adopts a context-based approach to rights protection. While it affirms many rights also recognised in universal instruments, it simultaneously permits broad "limitations" based on grounds such as "national security," "public order," and "public morality" (Rüland, 2013). This formulation gives States wide discretion to restrict rights in accordance with domestic laws and societal norms, thereby embedding ASEAN's longstanding preference for flexibility and non-interference within its human-rights acquis. In this sense, both the AICHR and AHRD are important in the formulation of a common language for rule-of-law and human rights in such a diverse bloc, while explicitly avoiding judicialisation, paving the way for increased cooperation and rule-of-law guarantees.

Recent enlargements further demonstrate that ASEAN's acquis operates through political consensus and administrative preparedness rather than rule-of-law conditionality. Cambodia's admission, with the country initially applying for membership in 1997, was postponed after the violent political crisis that year, an implicit acknowledgement that instability could delay accession, though no formal democratic or rule-of-law benchmarks were formally imposed ("ASEAN and the Question of Cambodia," 1997). Timor-Leste's accession process, spanning more than a decade from 2011 to 2025, similarly centred on technical and administrative readiness, such as setting up embassies in all Member state capitals, rather than substantive legal or institutional convergence (Sidiq, 2023). Unlike the EU's acquis communautaire, where accession hinges on compliance with the Copenhagen criteria, including strict rule-of-law and democratic standards, ASEAN's acquis emphasises inclusivity and political unity, with accession conditioned primarily on the capacity to participate rather than on amending domestic constitutional or governance structures (EUR-Lex, n.d.-a).

ASEAN's rule-of-law framework promotes important principles of democracy and human rights through dialogue, cooperation, and soft commitments. ASEAN's approach remains shaped by its foundational values such as emphasis on retaining complete sovereignty, equality among States through consensus, non-interference and inclusivity under a shared respect for the bloc's domestic political and constitutional diversity. This stands in contrast to the EU's approach, where supranational mechanisms, binding legal norms, judicial remedies, and financial conditionality can be deployed to address rule-of-law challenges.

4.3 Supranational mechanisms supporting rule-of-law compliance in the EU

The EU's Treaties contain explicit mechanisms designed to safeguard the rule of law at the level of Member state governance. Article 2 TEU identifies the rule of law as a foundational Union value, while Article 7 TEU was introduced as a political mechanism to address "a clear risk of a serious breach" or "a serious and persistent breach" of this value by a Member state (EUR-Lex, 2025a). In principle, this mechanism was intended to function as the Union's strongest response to systemic threats such as judicial capture, corruption, or the erosion of checks and balances. However, Article 7 has proven almost impossible to activate in practice, because it requires unanimity, allowing potential violators to shield one another and producing political stalemate in cases such as Hungary and Poland. This deadlock prompted the development of a more functional enforcement tool, the rule-of-law conditionality regulation (EU) 2020/2092, which links respect for the rule of law to access to the EU budget (Regulation 2020/2092, 2020). This regulation functions through ordinary supranational decision-making (qualified majority voting), hence the mechanism can be triggered even when the government under scrutiny has a handful of political allies voting in its favour. Its application to Hungary in 2022, freezing €6.3 billion in cohesion funds until institutional reforms were implemented, illustrates how budgetary conditionality has become a more credible and enforceable response to rule-of-law backsliding than intergovernmental mechanism in Article 7 TEU (Council of the EU, 2022).

Furthermore, the European Union's capacity to uphold the rule of law within the legal systems of its Member States also rests on a set of supranational enforcement mechanisms that were built into the EU's legal order to secure uniform compliance of its laws. The EU has a three-pronged system based upon decentralised enforcement by national courts using domestic redress systems to address "isolated" cases. This is accompanied by centralised oversight by the Commission and the Court of Justice that allows for EU-level infringement for more large-scale, persistent "systemic" issues (European Commission, 2022). For there to be collective benefits, States need to be deterred from "shirking" through "monitoring" and "sanctions" (Talberg, 2025). The European Commission acts as the guardian of the treaties, ensuring "the application of Union law under the control of the CJEU" (EUR-Lex, 2014). The Commission can initiate infringement proceedings under Articles 258-260 TFEU, bring Member States before the Court of Justice, and secure the imposition of financial sanctions in response to persistent non-compliance going against rule of law values of legal certainty and equality before the law by preventing selective compliance.

The CJEU is integral to the EU's enforcement architecture, whose early jurisprudence established that the EU Treaties function as the "grundnorm" and their authority requires that domestic legislation be set aside whenever it contradicts EU obligation. In Costa v ENEL, the Court held that the EEC Treaty had created "its own legal system" whose rules "cannot be overridden by domestic legal provisions" (EUR-Lex, 2019). This doctrine became the backbone of rule-of-law enforcement by promoting legal certainty and equality: governments cannot selectively ignore EU law, and national authorities must respect Union law even when domestic legislation or political preferences point the other way. The full practical effect of supremacy was articulated in the Simmenthal case, where the Court held that national judges must "set aside of their own motion" any conflicting national law, immediately and without waiting for legislative repeal or constitutional court review, reinforcing the position EU Treaties at the top of the legal hierarchy of norms in Member States (EUR-Lex, 2024).

More recently, the CJEU has adapted supremacy to the context of judicial independence. In the LM (Celmer) case, which arose from concerns about political interference in the Polish judiciary, the Court held that it is important to verify whether problems in the issuing state's judicial system create a real risk of a breach of the right to a fair trial (Article 47 EU Charter) before carrying out a European Arrest Warrant (EAW) (Eucrim.eu, 2018). The Court did not presume a lack of judicial independence in Poland based on the concerns raised by Irish courts after LM was arrested there. Instead it triggered an elaborate assessment to identify systemic deficiencies affecting judicial independence in the issuing state, and evaluate whether those deficiencies endanger the individual concerned. The LM case demonstrates that supremacy today functions not only to prioritise EU law over conflicting national provisions, but also prioritise the EU's fundamental rule-of-law guarantees in the implementation of its own law measures like the EAW (EUR-Lex, 2025b). Finally, the EU's judicial review mechanisms under article 263-266 TFEU, ensure that EU institutions themselves respect legality when upholding rule-of-law.

These doctrines, conditionalities, and rulings form part of a deeply integrated judicial architecture in which the EU acquis is upheld through binding supranational control. Complementing this is the acquis communautaire adhesion process, which requires prospective Member States to align their constitutional structures, legislation, and judicial systems with the EU Treaties, as codified in the Copenhagen criteria. Together, these mechanisms create a system in which attempts by governments to weaken domestic rule-of-law safeguards are constrained not only after accession through supranational enforcement, but also before accession through stringent pre-entry screening. Internal rule-of-law backsliding becomes less likely at the cost of foregoing key intergovernmental principles of non-intervention and consensus voting with the prevalence of qualified majority voting in the EU.

5 Discussion: Adapted strategies for reinforcing ASEAN's rule-of-law commitments without mirroring the EU model

The ASEAN Community Vision 2025 reaffirms the intergovernmental "ASEAN Way" values of consensus and non-interference as the foundation of cooperation. Hence, although Vision 2025 aspires to a "rules-based, people-centred, and cohesive ASEAN," it does not mandate supranational courts or binding enforcement analogous to the EU. Institutional reform must therefore proceed within ASEAN's existing acquis, not in opposition to it. The question is thus not whether ASEAN should emulate EU-style supranationalism, but how it can incrementally reinforce rule-of-law commitments through mechanisms compatible with its political and constitutional diversity.

An approach that aligns with the "ASEAN way" is the development of a more structured form of minilateralism inspired by the logic (but not the supranational form) of the EU's enhanced cooperation mechanism under Article 20 TEU (EUR-Lex, 2016). ASEAN already uses flexible, issue-specific coalitions in highly technical areas such as transboundary haze mitigation and disaster management. These arrangements allow willing States to deepen cooperation without imposing obligations on the rest, demonstrating that differentiated integration is already part of the ASEAN acquis. Building on this practice, ASEAN could create a voluntary "Area of Freedom, Security and Rule of Law" (AFSR) opt-in track in which a subset of States commits to deeper governance cooperation, such as shared principles on judicial ethics and independence, minimum anti-corruption safeguards, or transparency in administrative procedures, while maintaining the intergovernmental character of ASEAN decision-making.

Such an arrangement would not replicate EU supranationalism: participating States would still retain full control over the scope of commitments, and no binding enforcement mechanisms would be created. Instead, it would extend existing ASEAN logics of technical cooperation and capacity-building into rule-of-law-relevant domains. Importantly, this approach fits with post-Asian Financial Crisis (1997) developments, where ASEAN increasingly recognised the need to build investor confidence by ensuring institutional stability, and began building institutions like AICHR and the ADHR (European Parliament, 2025). A minilateral arrangement framed as being a body of States committed to upholding the rule-of-law to build investor confidence may appeal to a lot of Member States seeking economic growth. ASEAN States will be more likely to opt-in with this added financial incentive, and to allow new bodies a limited advisory mandate to identify and help mitigate rule-of-law concerns. The opt-in mechanism would avoid imposing obligations on unwilling Member States while providing a concrete venue for addressing rule-of-law concerns more systematically.

Furthermore, the mandate and procedures of AICHR have potential for positive adaptation without exceeding an intergovernmental framework like the CJEU and ECHR. The evolution of the EU serves as an example that human-rights oversight need not begin with full supranational adjudication: prior to the establishment of the European Court of Human Rights as we know it today, individuals could only petition the European Commission of Human Rights, which then decided whether to bring a case forward (Caprita, 2025). ASEAN could expand AICHR along similar lines without granting it binding authority.

In addition, AICHR's role could be incrementally expanded to support rule-of-law improvement in States that opt-in to the "Area of Freedom, Security and Rule of Law" (AFSR) without granting it any coercive powers. Concretely, AICHR could be mandated to:

- *Conduct confidential country assessments*

These quasi-investigations would be triggered upon invitation by the Member state itself or by other AFSR States if they are part of the proposed minilateral arrangement (comparable to Poland's EAW case but much less intrusive), to identify emerging rule-of-law concerns and recommend remedial action. These assessments would remain advisory and non-public.

- *Receive petitions from individuals or civil-society entities regarding alleged rule-of-law issues or solely human rights violations*

This proposed adaptation draws partial inspiration from the former European Commission of Human Rights, except that such petitions would not trigger adjudication or binding rulings. Rather, AICHR would be empowered to prepare confidential assessments containing recommendations addressed solely to the state concerned, aiming to identify systemic issues and suggest corrective measures.

Within a voluntary "Area of Freedom, Security and Rule of Law" (AFSR) track, States opting in would accept additional reputational commitments. In this minilateral framework, repeated and well-substantiated petitions indicating persistent rule-of-law deficiencies, combined with a lack of meaningful remedial action, could allow AICHR to recommend that participating States consider temporarily suspending the non-compliant state’s participation in the AFSR. This would not affect ASEAN Membership nor carry legal sanctions, rather it would preserve the credibility of the AFSR as a trust-based mechanism created to support investor confidence by maintaining stable institutions. The reputational consequences of losing access to this track would create incentives for reform, while remaining fully compatible with ASEAN’s consensus-based model.

Ultimately, these possible adaptations suggest that ASEAN can reinforce rule-of-law commitments not by importing EU institutional designs as a replicable model, but by incrementally expanding its own “ASEAN acquis” in ways that preserve sovereignty, maintain consensus, and still generate credible incentives for compliance (e.g. building investor confidence instead of sanctions).

6 Conclusion

The comparison reveals that the divergence between the two organisations is rooted in foundational conditions. ASEAN's constitutional heterogeneity, Cold War origins, and deeply embedded principles of non-interference and consensus produced an institutional logic fundamentally distinct from the liberal-democratic convergence that made European supranationalism politically feasible. Any reform agenda that ignores this distinction risks undermining the cohesion that ASEAN's intergovernmental acquis has maintained across one of the world's most diverse regional blocs.

Yet, neither model can be deemed perfectly static. ASEAN has gradually expanded its normative architecture through instruments such as the AICHR and the AHRD, while the EU itself developed its most effective rule-of-law tools, budgetary conditionality and infringement proceedings, incrementally and in response to political deadlock. The lesson is that accountability mechanisms can be built within an intergovernmental framework, provided they are anchored in existing institutional logics rather than imposed from outside them like a type of colonial civilising mission.

A voluntary opt-in framework and an expanded AICHR mandate could generate credible incentives for compliance, through reputational consequences and investor confidence rather than the threat of sanctions, without requiring any transfer of sovereignty. The EU's experience offers not a replicable template, but a comparative reference point from which ASEAN can selectively draw to deepen its rule-of-law commitments on its own institutional terms. Perhaps there are lessons that the EU can learn from ASEAN’s system as it expands and deals with increasing heterogeneity, internal backlash and tensions - this is an avenue for future research.

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