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RESEARCH ARTICLE



From multistakeholderism to digital sovereignty: Toward a new discursive order in internet governance?

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Abstract

Since the early 2000s, the multistakeholder governance approach has been the reference model for transnational internet governance, reaching far beyond the original field of technical coordination and standard-setting. But over the last decade many countries, including democracies supportive of multistakeholderism, have adopted measures to strengthen their digital sovereignty. Thereby, they have been advancing discourses and practices that reinforce state power with regard to the digital and are often at odds with the multistakeholder model. This paper analyzes the emerging dialectic between multistakeholder internet governance and digital sovereignty by seeking to understand how the pursuit of digital sovereignty is increasingly challenging the hegemony of the multistakeholder discourse in internet governance. To this purpose, it reassesses the historical development of power struggles over the internet through the analytical lenses of the discourse coalition framework. After reconstructing how the multistakeholder discourse has emerged and institutionalized in the internet governance arena, the paper retraces the expansion of the digital sovereignty discourse, regarding both the actors promoting it and the narratives attached to it. It also identifies key motivations behind this discourse. Finally, the paper discusses whether the digital sovereignty discourse is emerging as a new discursive order in the internet governance field and draws attention to

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conditions that could either support or weaken its emergence.

KEYWORDS

digital policy, digital sovereignty, discourse coalition, internet governance, multistakeholderism

INTRODUCTION

In October 2019, the German Federal Chancellor Angela Merkel opened the Internet Governance Forum (IGF) in Berlin with a speech that surprised many in the audience. Hosted by Germany, the IGF 2019 was the 14th instance of this annual meeting, created by the United Nations as a multistakeholder discussion forum for all issues pertaining to the management and coordination of the internet, as well as its usages and services. Merkel emphasized the importance of multistakeholderism by stating that “all of us”—meaning civil society, business, the scientific community, as well as all governments—needed to work together to shape the internet's future, and warned of the risks related to “national interests” interfering with the free and open internet. But she also stressed the importance of retaining digital sovereignty (Merkel, 2019), a term that at the time had only started to structure the official communication of the European Union (EU) and the German government. With this speech, not only did Merkel build a surprising bridge between the preservation of multistakeholder processes in global internet governance on the one hand and the pursuit of digital sovereignty on the other—and thus between two discourses that appear almost diametrically opposed—but she also acknowledged that the concept of digital sovereignty is itself contested and that different governments may attach very different ideas to it:

But it may be that we all have come to understand something different by that, even though we are using the same term. As I understand it, digital sovereignty does not mean protectionism, or that state authorities say what information can be disseminated—censorship, in other words; rather, it describes the ability both of individuals and of society to shape the digital transformation in a self-determined way. (Merkel, 2019)

The quote clearly shows Merkel's awareness of the risks and tensions inherent in the emerging digital sovereignty discourse, most prominently that, by adhering to this new discourse, Germany would create an unwilling alliance with authoritarian countries who have long fought the dominance of multistakeholder internet governance processes.

This article analyzes this political dialectic between multistakeholderism and digital sovereignty. Its main objective is to understand whether and how the pursuit of digital sovereignty is increasingly challenging the hegemony of narratives related to the multistakeholder approach in global internet governance. The latter approach, which found in the IGF one of its most prominent implementations, has been the reference model for transnational internet governance processes since the early 2000s. Multistakeholderism thereby refers to a set-up in which different groups of state and nonstate actors come together to discuss and find consensus on issues that are usually cross-border and whose coordination appears to go beyond the responsibility of established multilateral institutions. But similar to digital sovereignty, the multistakeholder discourse is characterized by a certain openness and vagueness, which allows different actors to attach different narratives and ideas to it. Thus, multistakeholderism serves as “an imaginary that provides meaning and regularity to

a fragmented, disorderly world” (Hofmann, 2016, p. 30) and, in this function, has developed into an almost untouchable mantra for participants of global internet governance processes. Yet, over the last decade an increasing number of policy-makers, including from democratic governments supportive of multistakeholderism, have adopted measures and plans to strengthen their digital sovereignty. Thereby, they have been advancing discourses and practices that reinforce state power with regard to the digital and are often at odds with the multistakeholder model.

To understand how digital sovereignty efforts are challenging the multistakeholder discursive order, the article first illustrates the conceptual framework of the study, which draws upon an ideational approach to the study of transnational policy-making. From this perspective, both multistakeholderism and digital sovereignty are conceived of as performative policy discourses, each one uttered by a specific group of actors, promoting a defined set of interests and practices, and relying on a distinctive ensemble of ideas and narratives about how to govern the digital sphere. Drawing on the existing research literature on internet governance and digital policy, the article then reconstructs how multistakeholderism emerged and gained the status of a dominant policy discourse in the internet governance arena, and how it became institutionalized over time. It further retraces how the digital sovereignty discourse expanded, both in terms of the actors promoting it and of its scope, and analyzes the common motivations that contributed to the structuration of the digital sovereignty discourse worldwide. Finally, the paper addresses whether the digital sovereignty discourse is emerging as a new discursive order in the internet governance field, and draws attention to conditions that could either support or weaken the emergence of a digital sovereignty discursive order as an alternative to multistakeholderism.

ORDERING THROUGH DISCOURSE: AN IDEATIONAL APPROACH TO POLICY-MAKING

Over the past decades, academic interest in the role of ideas, narratives, and discourses in international politics and policy studies has been growing steadily. Rather than framing policy-making in a neo-positivist epistemology and describing it as a value-free technical process, ideational approaches to policy-making share a constructivist understanding of meaning-making in politics. Policy-makers construct a certain idea of reality by using words to describe and contextualize phenomena. By placing these phenomena in relationships to each other, they create and attribute meaning to the various aspects that are part of a particular discourse. This means that ideational approaches commonly take a relationalist, contextual, and, very often, historical perspective of the creation of meaning in politics as they believe that discourses influencing politics can only be construed, understood, and interpreted in their relation to others and within a particular context (Howarth & Torfing, 2005, p. 14). Furthermore, ideational perspectives on policy are based on the understanding that discourses are being productive and reproductive of what is defined by the discourses themselves. A particular discourse produces a certain worldview by defining what is perceived as reality or truth; it thereby excludes other, alternative interpretations. In return, stabilized in official policy texts and through practical implementation, the privileged worldview facilitates the production of meanings, which are in line with the initial discourse, and thus reproduces it. From such a perspective, a discourse is a set of rules about what can and cannot be said (Gasper & Apthorpe, 1996, p. 4).

Policy discourse analysis also acknowledges the role of actors and their interests as well as the institutions in which they interact. Discourses do not simply appear, they are always proposed and promoted by actors who might or might not effectively use them to advance their interests. At the same time, political and economic interests are not unswayable

characteristics of policy actors but necessarily a reflection of more fundamental beliefs and ideas. Thus, by understanding policy discourse as the outcome of joint productions of meanings among various policy actors, its analysis cannot neglect the interplay of ideas, interests, and material political economy as well as their impact on the actors involved in the creation of policy discourse (Schmidt, 2012, p. 91). Moreover, interactions among policy actors do not take place in a vacuum, rather they are influenced by formal and informal institutions. They provide the context in which policy-making takes place and determine the degree of openness that different actors display towards certain sorts of policy ideas (Jones, 2009, p. 13). Hence, institutions constrain and filter policy discourses since every new idea, concept, or narrative needs to be tailored to these institutions. But they also enable and facilitate the introduction of a discourse since they provide the conceptual or constitutional frame for actors to advance, exchange, and adopt new ideas and narratives.

Among the authors who have developed this ideational perspective on policy-making into a conceptual and methodological approach, this paper primarily builds on the work of Maarten Hajer who adapted the Foucauldian concept of “order of discourse” to the study of public policy-making and combines the analysis of discourse with a focus on the actors and the institutions involved in the policy processes. Drawing on his framework, we understand a policy discourse to be a “specific ensemble of ideas, concepts, and categorizations that are produced, reproduced, and transformed in a particular set of practices and through which meaning is given to physical and social realities” (Hajer, 1995, p. 44). To connect the (re-) production of discourses to the actors promoting them, we identify “discourse coalitions,” meaning a group of policy actors who share ideas over extended periods of time and who, thanks to their having joined forces, are able to convince other political actors, and eventually the public, of the necessity and appropriacy of a certain idea (Hajer, 1993). The particularity of a discourse coalition is that actors do not necessarily need to agree on everything or to coordinate their actions to build one. Neither do they need to share the same values or interests. Instead, by employing the same narratives and practices, these actors contribute—deliberately or unknowingly—to the emergence, reproduction, and assertiveness of a common discourse (Hajer, 1993).

In addition, Hajer's framework allows us to describe the influence that policy discourses have beyond a limited group of actors. If a discourse coalition successfully promotes a particular discourse on a larger scale, it “starts to dominate the way a society conceptualizes the world.” In this case, we face a process of “discourse structuration” (Hajer, 1993, p. 46). Further, when this discourse becomes even more dominant, it can “solidify into an institution, sometimes as organizational practices, sometimes as traditional ways of reasoning” (Hajer, 1993, p. 46). In that case, we are witnessing a process of “discourse institutionalization,” which has even larger repercussions for the reproduction of the policy discourse and its underlying beliefs. Thus, following Foucault, Hajer also stresses the fact that, when a dominant discourse reaches a certain level of institutionalization, it starts working as an ordering device:

Discourses imply prohibitions since they make it impossible to raise certain questions or argue certain cases; they imply exclusionary systems because they only authorize certain people to participate in a discourse; they come with discursive forms of internal discipline through which a discursive order is maintained; and finally there are also certain rules regarding the conditions under which a discourse can be drawn upon. (Hajer, 1995, p. 49)

It is this particular effect that we mean by discursive order. But the concept of discursive order should not be understood as a static one. Rather, discursive orders are both the (always unstable) outcomes of discursive struggles, and the cognitive spaces within which different discourse coalitions keep on fighting over meanings and definitions.

Studying the influence of particular discourses and how they developed into ordering devices that structure policy processes, shape institutions, and define power dynamics in the internet governance field has a long scholarly tradition. The next sections build on the existing research, including the empirical data, theory, and analysis developed in this branch of studies to outline the historical modalities through which the multistakeholder governance discourse, and more recently the digital sovereignty discourse, have been structured and institutionalized, with the latter now challenging the former in its function of an ordering device.

MULTISTAKEHOLDERISM AS A DISCURSIVE ORDER IN GLOBAL INTERNET GOVERNANCE

In what was then the newly-emerging policy field of global internet governance, the multistakeholder discourse arose in the early 2000s as a compromise between two main discourse coalitions that were confronting each other in a debate over the control of the internet's Domain Name System (DNS). The issues at stake were the management and distribution of the internet's resources that ensure on a technical level the smooth functioning of the network, such as domain names, Internet Protocol (IP) addresses, and the root server system.

The first discourse coalition was composed of the US government, the US private sector, and the technical community of computer scientists and engineers that had contributed to the development of the early internet. This coalition promoted a discourse based on a mix of libertarian and neoliberal narratives, advancing and supporting the ideas of private self-regulation and private-led internet development (Chenou, 2014, p. 207). This first coalition was, in turn, already the outcome of a previous discursive struggle that had unfolded during the 1990s and is important for understanding how these actors' discourse relating to self-regulation was institutionalized in internet governance and continues to structure the policy field to this day. At its core, this discourse presents a story of success, unfolded along two main narratives contributed by two different groups of actors. The first narrative, mainly promoted by the US government, was about the origin of this success and told the story of a network built and popularized by private actors, a network whose fast development was facilitated by market mechanisms and loose government control. Accordingly, the actors behind this narrative argued that the internet's administration needed to be entrusted to private actors, with the US government playing an oversight role for national security purposes only (Goldsmith & Wu, 2006). The other narrative, mainly expressed by the technical community, described the ultimate destiny of the internet, that is, its unavoidable universality, the inseparable and inalienable value of interconnection, and the irresistibility of the free flow of information (Carpenter, 1996). Because of these presumed characteristics, this narrative claimed that the internet would require the creation of a new transnational system of governance, which had to be based on a set of apolitical policy principles like those that had been developed by the technical community and synthesized in the famous motto: "We reject: kings, presidents, and voting. We believe in: rough consensus and running code" (Clark, 1992).

These two narratives that complemented each other in the self-governance discourse, shared an exceptionalist perspective on the internet and "cyberspace," meaning the social space that was emerging on top of this infrastructure. As a digital, transnational, and decentralized networking technology, the internet—according to this belief—would transcend places and national borders. Consequently, it had to be considered as a new kind of virtual space, separated from the natural realm and from the geography of world politics; as such, it had to be irreconcilable with the idea of state-based territorial sovereignty. This cyber-

exceptionalist belief in the uniqueness of the internet was heavily marked by a pragmatic brand of libertarianism that had already served as a major ideological influence on its technical development (Wu, 2010). Based on a strong distrust of established political decision-making processes and institutions, the core of cyber-libertarian convictions was that existing political structures would become obsolete with the expansion of digital networks. From this perspective, governments, as symbols of state power, had no place in the new virtual space because they could not exercise their authority there (Barlow, 1996). The exceptionalist ideas complemented the neoliberal ideology of the US government of the time: while it rejected the idea of an informal technical community running the internet independently of both state and business authorities, the Clinton-Gore administration embraced cyber-exceptionalism as a way to legitimize the creation of a new, ad hoc governance system for the internet. They also used it to justify the exclusion of intergovernmental mechanisms and arenas that had been previously established for the coordination of other transnational communication networks such as for telegraph, telephone, and satellites. In 1998, the US government and the community of internet technicians institutionalized their self-governance discourse by creating a nonprofit corporation based in California, the Internet Corporation for Assigned Names and Numbers (ICANN), which was charged with the administration of the DNS (Department of Commerce DOC, 1998).

As soon as it was set up, ICANN and its role for internet governance started to be challenged by a new discourse coalition, which opposed the idea of self-regulation. In large part, this coalition was made up of national governments (led by the BRICS countries, i.e., Brazil, Russia, India, China, and South Africa), international organizations, such as the International Telecommunication Union (ITU), and in an initial phase also the EU. These actors, which have been labeled by scholars as sovereigntists (Flonk et al., 2020; Mueller, 2010), shared an internationalist discourse based on normative narratives. Unlike the ontological narratives of the self-governance discourse about the origins, nature, and destiny of the internet, the internationalist narratives focused on its deontology and political status. Accordingly, most of these narratives emphasized the need for an intergovernmental management of the DNS, which had to be designed to provide a more legitimate regime and a better representation of global interests in the governance of a network that had spread well beyond the United States. In addition, the internationalist discourse coalition also assembled actors who were not explicitly aiming at an intergovernmental solution for the management of the DNS, but opposed an internet governance order too strongly influenced by technical and commercial concerns. Developing countries, for example, shared some narratives of the internationalist discourse to advocate for increased international responsibility in providing developmental aid to bridge the digital divide, support economic development, and prevent a technology-driven exacerbation of existing historical disparities. A small group of civil society associations also supported parts of the internationalist discourse to stress the need for the democratization of internet governance and for the protection of universal human rights.

The struggle between the self-regulation coalition and the internationalist discourse coalitions crystallized into the UN-hosted World Summit on the Information Society (WSIS) in the early 2000s. During WSIS, the self-governance discourse coalition advanced the dystopian narrative of a threatening UN takeover of the internet and a consequent over-regulation of digital innovation (Mueller, 2010, p. 75; Thumfart, 2022). The internationalist discourse coalition, instead, narrated the utopian future of a “new cooperation model” (European Commission, 2005) based on multilateral agreements and that would respect the “sovereign rights of countries” and “the sovereign equality of all States” (Brazil, 2003; Saudi Arabia, 2003), able to grant a fair and just redistribution of internet resources (Bangladesh, 2003; Cuba, 2003) as well as a democratization of internet governance (ALAI et al., 2022). From this discursive confrontation and the power struggle between coalitions,

the multistakeholder approach emerged as a compromise that would allow the various actors to develop a common understanding of the governance problems they were facing, and at the same time continue to struggle for their definitions and meanings. After having emerged about a decade earlier, the idea of multistakeholderism had gained popularity as an approach to bridge state and nonstate participation in transnational policy domains thanks to several UN summits (Hofmann, 2016, p. 31). Promising a way to develop long-lasting, albeit nonbinding rules and standards in a consensual manner, the multistakeholder discourse in the emerging internet governance field was grounded on a pragmatic agreement between the opposing two coalitions, as well as on a widely-shared belief. The agreement consisted in the separation between two governance layers: On the one hand, the day-to-day operations that keep the internet running and that should be entrusted to businesses and noncommercial operators that were already managing the basic functions of the network, for example, within ICANN. On the other hand, issues related to the interplay of digital networks and technologies with society were recognized as public policy concerns, in which national governments could legitimately have a role (WSIS, 2005, art. 35). Although it was substantially in favor of the self-regulation discourse coalition and the status quo that it defended, the recognition of a public policy space in internet governance made the multistakeholder compromise acceptable for the internationalist discourse coalition, which saw this space as a viable field for future political struggles.

Within the 3-year timespan of WSIS, (2003–2005), the multistakeholder discourse not only took root in the official—and near-infinitely quoted—definition of what is meant by internet governance¹ but also became hegemonic beyond the WSIS participants. It successfully constructed a common belief about the uniqueness of the internet and its global and inseparable nature. The uncontested idea of a universal internet was indeed a stratification of all the previous dominant narratives: the cyber-exceptionalism of the libertarian discourse, the globalism of the neoliberal discourse, and the multilateralism of the internationalist discourse. The multistakeholder discourse also started to structure the field through new narratives of multistakeholderism as a facilitator of policy dialogues based on principles of open and egalitarian participation, diversity, and bottom-up stakeholder engagement (Hofmann, 2016, p. 30). In addition, it was institutionalized in a multilevel polycentric web of forums and organizations, most prominently the IGF, created in 2005 to continue WSIS debates on a yearly basis. None of these bodies, according to the principle of separation, was intended to replace ICANN in controlling the DNS, nor to produce binding decisions. Yet, multistakeholderism turned into such a “teleological goal for Internet governance” (DeNardis & Raymond, 2013, p. 2) that even many existing internet-related organizations, including ICANN, started to define themselves as multistakeholder institutions (Chenou & Radu, 2014). As a result, over the years, the concepts of internet governance and multistakeholder governance became almost synonymous (Carr, 2015, p. 641). If we can assume that, within a given policy domain, the highest ordering capacity of a discourse occurs when it is able to define the entire domain and its social actors, then at the end of the 2010s, the multistakeholder discourse was without any doubt the dominant ordering device of internet governance. As such, it served as a legitimizing discourse able to generate rule compliance without state coercion (Palladino & Santaniello, 2021).

However, despite being able to unite several discourse coalitions and being institutionalized so successfully in the field, the discursive order of multistakeholderism remained controversial. In other words, it did not extinguish controversies, but rather channeled them into an institutional framework defined by discursive rules and routine practices. A major source of conflict remained the fact that the multistakeholder discourse continued to undermine established institutions, replacing government-dominated international bodies with the principle of transnationalism. In the logic of the new discursive order, coordination by intergovernmental organizations would be an obstacle to the global nature and development

of the internet due to diverging national objectives and the short-sighted, selfish interests of some states. Conversely, representatives of some states continued to insist on their demands that internet governance processes and the authority to make binding decisions be put in the hands of multilateral institutions and hence be more heavily subjected to state control (Ebert & Maurer, 2013, p. 1063; Musiani & Pohle, 2014).

In sum, we define the multistakeholder discursive order as a policy discourse, which emerged in the field of internet governance in the early 2000s, became hegemonic and fully institutionalized throughout the first decade of the century, and shaped the global politics of internet governance at least until the end of the 2010s. From this perspective, multistakeholderism has not simply become “a proxy for broader political struggles” (DeNardis & Raymond, 2013, p. 2); it has also provided a discursive space where different discourse coalitions have been in mutual competition, with narrative resources being utilized in the struggle over the control of definitions and meanings (Santaniello & Palladino, 2022). The critical positions have largely focused on the actual implementations and outcomes of multistakeholderism, but—for many years—did not question the boundaries nor the basic rules of the game within this space of contention. As a matter of fact, eventually multistakeholderism was even embraced by the main alternative institution to ICANN, that is, the ITU. National governments and intergovernmental organizations have also become key actors of multistakeholder institutions, regularly participating in the IGF with their representatives. The capacity of the multistakeholder discursive order to assimilate and accommodate different discourse coalitions turned it into a space in which different narratives—that have become dominant at different times—became layered into a complex sediment of definitions and meanings (Figure 1).

DIGITAL SOVEREIGNTY: THE EXPANSION OF A POLICY DISCOURSE AND ITS REASONS

States have always sought, and often succeeded in, both territorializing the digital space and shaping digital networks and digital services, be it through legal or practical measures or by providing the regulatory framework to guide the behavior and growth of other stakeholders (Mazzucato, 2013). For many years now, both authoritarian and democratic states have monitored, controlled, and censored the exchange of communication and data via the internet within a particular country or region, for example to suppress defamatory statements and dissident opinions, to protect intellectual property rights, or to counter disinformation and illegal activities. In addition, by regulating the conditions under which digital service providers can operate across borders, states have also found ways to exercise their power without subjecting the digital sphere to territorial sovereignty (Burri, 2017; Celeste, 2021, p. 5). Thus, the cyber-libertarian belief that states would have little or no authority over the internet and its users—a narrative that, as we have argued, strongly influenced self-regulatory and, subsequently, multistakeholder discourses—seems to have outlived its validity. From today's perspective, digital networks are perceived as a challenge, not a barrier to the exercising of state power.

The idea of digital sovereignty—which has gained so much attention lately—needs to be seen in the context of asserting state authority over the internet. However, in its manifold variations, the digital sovereignty discourse goes far beyond confirming and enforcing interventions by nation states in the digital space. The first and most prominent actor to call for more national sovereignty in digital matters was the Chinese government, which had been promoting both the preservation of territorial borders and the recognition of national governments as the dominant regulatory bodies since the early days of the global internet. In a 2010 white paper, it structured these various claims in the form of a strategy that seeks to

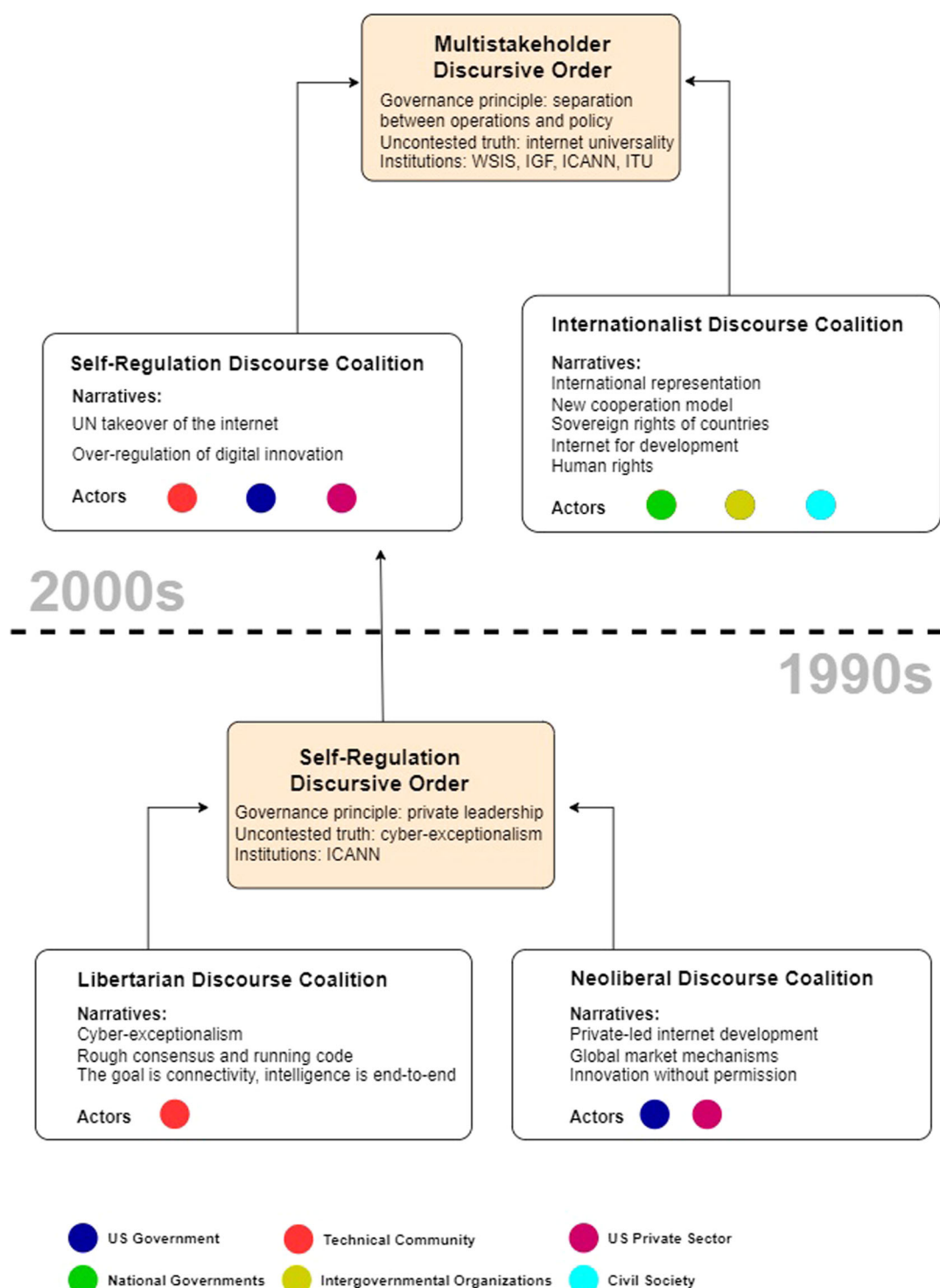


FIGURE 1 Discourse coalitions (DC) and discursive orders in internet governance (1990s–2010s).

protect Chinese “internet sovereignty” (Creemers, 2016, p. 123). While the Chinese digital sovereignty discourse is marked by a strong inward-looking ambition to enforce stronger governmental control of the domestic internet usage of its population, it also includes outward-oriented goals. Thus, it seeks to expand the regime's legitimacy at the international level by promoting the Chinese IT industry, its nationalist ideology, and their preferred alternative model of global internet governance based on traditional notions of sovereignty and jurisdiction (Jiang, 2010, p. 82). Besides expanding China's ideational and material influence, the Chinese digital sovereignty discourse also impacted the approach of other authoritarian and semi-authoritarian governments (Polyakova & Meserole, 2019). Russia, for instance, has been promoting similar ideas and narratives based on a territorial understanding of sovereignty, first through diplomatic means, later also through technical means. Yet, while it has formed an alliance with China since the early 2000s to oppose the hegemonic position and discursive influence of the United States in global internet governance (Budnitsky & Jia, 2018, p. 599), Russia's efforts to achieve sovereignty in the digital sphere are based primarily on the principle of noninterference and—in contrast to China—less on the economic, technical, and ideological export of alternative internet governance beliefs (Litvinenko, 2021; Nocetti, 2015, pp. 112, 121). The focus is rather on the securitization and independence of the Russian internet segment RuNet, the geographically defined part of the network that is subject to the authority of the Russian government (Stadnik, 2019). In 2019, the Russian Duma eventually institutionalized the Russian digital sovereignty discourse in a law requiring Russian internet providers to create the technical infrastructure that would make it possible to route all internet traffic locally, in case of necessity (Epifanova, 2020).

Today, digital sovereignty claims are no longer limited to (semi-)authoritarian regimes. Over the last decade, various liberal democracies made it their ambition to re-establish the nation state—including its citizens and the national economy—as a relevant category in the regulation and governance of the internet and of digital services. Most prominently, the EU has been developing and promoting a rather pronounced digital sovereignty discourse, which continues to grow both in scope and in public acceptance. Within the European member states, the idea of digital sovereignty initially emerged in France and later in Germany where, since 2013, it has been structuring debates on digital matters not only among policy-makers but also quite prominently among nonstate actors from the private sector, academia, and civil society (Danet & Desforges, 2020; Pohle, 2020; Thumfart, 2022). Gradually the discourse percolated from the national to the European level where it began to structure digital policy debates. In 2020, the pursuit of digital sovereignty was officially made the key objective of the EU's digital policy agenda (von der Leyen, 2020) and, ever since, has been increasingly institutionalized in a large variety of policy documents and regulatory initiatives. Initially, narratives evolved around the competitiveness of the European internal digital market, the safety and rights of European citizens, and the security and autonomy of European (digital) infrastructures. Yet, over the years, the EU digital sovereignty discourse turned its primarily inward-oriented perspective toward more global aspects (Burwell & Propp, 2020; Monsees & Lambach, 2022). Today, one of its key narratives claims that, to preserve its own self-determination, the EU needs to turn into a global regulatory superpower (Hobbs, 2020). By diffusing European regulatory values and norms globally, the EU would be able to establish itself “as a strategically autonomous third actor” that offers an alternative to the US-led liberal model and China's restrictive digital governance model (Broeders et al., 2023, p. 1266; see also Santaniello, 2021).

Following the leadership of China and Russia, the other BRICS countries—Brazil, India, and South Africa—have also picked up these narratives and developed initiatives aimed at reclaiming their own digital sovereignty (Belli, 2021). Yet each of these countries has approached this endeavor with a unique perspective, focusing on addressing specific challenges and opportunities presented by their individual economic and geopolitical

circumstances. Consequently, their efforts have culminated in the development of diverse discourses and policies tailored to their distinctive needs and goals concerning digital sovereignty (Jiang & Belli, [forthcoming](#)). Furthermore, in BRICS countries, grassroots initiatives driven by nonstate actors have emerged, both as a form of resistance to draconian measures adopted by authoritarian states (Bronnikova et al., [forthcoming](#)), and as a social movement for people's sovereignty over technologies (MTST, [2023](#)).

Discourses of digital sovereignty are gradually expanding also in Africa and the Euro-Mediterranean region. In African countries, the prominent narratives are often informed by their status as developing nations and their past as colonized societies. Hence, they focus on developmental issues, postcolonial and neocolonial relations (Fischer, [2022](#); Gagliardone, [2023](#); Gehl Sampath & Tregenna, [2022](#)), as well as social processes of labor exploitation and data extractivism (Coleman, [2018](#)). The focus on data sovereignty was also the one that the African Union has institutionalized in its 2020 "Digital Transformation Strategy for Africa 2020-2030" and its 2022 "Data Policy Framework." In the Euro-Mediterranean region, the understanding of digital sovereignty has been heavily influenced by European discourses. However, countries located on the southern shore of the Mediterranean basin predominantly emphasize the protective dimension of digital sovereignty; their discourse therefore lacks the duality of the European debate where digital sovereignty is always also associated with a competitive strategy aimed at assuming global leadership technology (Santaniello, [forthcoming](#)). In fact, this defensive or protectionist perspective appears to be a general feature of the sovereignty discourse in the Global South, where narratives usually evolve around the emancipation and resistance of smaller states and communities against large state powers and private corporations (Basu, [2023](#)). In the same spirit, digital sovereignty is also the pivotal concept around which debates and initiatives have been organized by Indigenous communities in New Zealand, Australia, Canada, the United States, and the Scandinavian Peninsula (Noone, [2022](#)), and which have also established a Global Indigenous Data Alliance (Carroll et al., [2021](#); see also Walter et al., [2021](#)).

The global diffusion of narratives and discourses related to digital sovereignty not only testifies to its attraction for groups ranging from state representatives to Indigenous communities; it also shows the vagueness and the broad scope of the concept, which allows different actors to fill it with meaning and to attach their preferred narratives and associations to it. It can even be argued that it is part of the attractiveness of the digital sovereignty concept that it can serve as a blank surface onto which various interests and political claims can be projected (Lambach & Oppermann, [2022](#)). However, despite the disparities in digital sovereignty discourses and their institutionalizations, state actors promoting them appear to be motivated by similar reasons, due to the common challenges countries around the world are seemingly facing.

One of the prime motivations can be found in a change of perception that gradually took place after 2013, that is, since the former CIA contractor and whistleblower Edward Snowden started to expose the extensive surveillance of digital data flows by the US intelligence services and their allies (Belli, [2021](#), p. 273; Pohle & Thiel, [2020](#)). The Snowden revelations were followed by a large public outcry in a number of states, including countries that are supporters of the US-dominated multistakeholder governance order, such as Brazil and those in the EU. In the medium term, they led many policy actors to realize that modern digitized societies are, in both a physical and structural manner, dependent on digital infrastructures and data flows that do not defy control (as propagated by the cyber-exceptionalists) but are steered and controlled by entities beyond their own sphere of power. This realization was subsequently reaffirmed by political events around the world that exposed the previously hidden dynamics of data flows via digital networks, especially how they can be used by various actors for political micro-targeting and to spread disinformation,

exemplified by contexts including the 2016 Brexit referendum, the 2016 US presidential elections, and the 2018 Brazilian general elections (Madiaga, 2020; Möllers, 2021). In many countries, stories about these events fostered demands to draw digital boundaries and the creation of digital spaces that are largely uncoupled from global data flows and that enable stronger national control of communication, data, and law enforcement.

Furthermore, narratives attached to digital sovereignty discourses show that they are also motivated by a general and growing discomfort with the current form of the digital economy, often described as platform capitalism (Srnicek, 2017) or surveillance capitalism (Zuboff, 2019). In this economic situation, the powerful and central position of a few tech companies, primarily headquartered in China and the United States, places the material and immaterial power over vital infrastructures of social life into the hands of private enterprises. In addition, through their rhetoric, technologies, and business models, these companies shape the way that people perceive sociotechnical developments; thus, they also “take over the imaginative power of shaping future society from state actors” (Mager & Katzenbach, 2021, p. 231). The sometimes almost hegemonic power exercised by these intermediaries not only makes it difficult to clearly differentiate between areas of activity that fall under the responsibility of states or of private actors, for instance in law enforcement (Tosza, 2021); these companies are also increasingly intervening in the roles of states and undermining their ability to (self-)regulate. In many countries, where policy-makers had to realize that they had very few instruments with which to counter these problems, this agglomeration of power has led to the demand for stronger regulation of platform companies and the digital economy in general (Hermes et al., 2020).

A third motivation behind sovereignty claims encompasses the infrastructural and economic dimensions of the first two but also incorporates global inequalities regarding both digital development and the participation in digital governance processes. Part of the influential cyber-libertarian vision underlying the multistakeholder discourse is the promise that the internet would create a world of freedom and equality on a global scale (Chenou, 2014, p. 213). However, as soon as the internet spread beyond the original, highly homogeneous communities situated in the United States and other Western countries, it became apparent that this assumed that the leveling, egalitarian quality of digital networks would not apply universally. Instead, today it is clear that the global value chains related to digital technologies and services are not only built on the structural inequalities of the past but also reinforce them and contribute to creating new ones. While the majority of today's internet users live in the Global South, their societies do not benefit in the same way from the digital economy and the digital transformation as those of the Global North (Heeks, 2022; Pinto, 2018). But also amongst the industrialized societies, some—in particular, China and the United States—are able to spearhead economic development, while others, including in Europe, struggle to keep up (Bjola, 2021). Thus, in Europe for instance, policy-makers started to claim that the EU must better position itself if it wants to play an active part in the geopolitical and geoeconomic power dynamics surrounding digital technology.

Building on this geopolitical motivation, it is possible to argue that there is a fourth line of reasoning behind digital sovereignty claims, and one which is of a stronger normative or ideological nature. Due to the continuously increasing cross-border flow of data and the global reach of digital services and business practices by platform companies, many political actors are concerned about the consequences for social stability and, in some cases, national identity. In authoritarian contexts, the emphasis of state power thus also seeks to justify a stronger control of national data flows and digital contents for the purposes of national security, ideological stability, and social peace. In democratic contexts, such as the EU, the goal of digital sovereignty is often framed as a means to protect liberal and democratic values, up to a point in which it is almost set as equal to the protection of democracy. Although different actors may infer different practices from this framing, the normative

justification logic behind the connection of digital sovereignty claims with political values and stability is similar.

In sum, over time, the digital sovereignty discourse gradually expanded in different dimensions: The first dimension concerned its acceptance among different groups of actors, as it moved from countries with an authoritarian political system to more liberal ones. But it also moved from state actors to nonstate actors, including businesses and civil society groups as well as minorities. Closely related to the first one, the second dimension concerns the geographical expansion of the discourse as it diffused first in China, then in some other BRICS countries and in Europe and, most recently, in the Global South and the Mediterranean region. During this diffusion, the scope and reference objects of the discourse also expanded—the third dimension. While it initially focused on the DNS and the controversy over the role of states in its management, the discourse is today dominated by narratives of IT security, the autonomy and competitiveness of the digital economy, the overcoming of structural inequalities, the regulation of platforms, the control of international data flows and domestic telecommunication infrastructures, as well as the normative values underlying both digital policies and standard-setting procedures. With these themes, the digital sovereignty discourse shares some of the narratives promoted by the internationalist discourse coalition that emerged during WSIS, in particular regarding the disproportionate US influence on global digital developments. However, the digital sovereignty discourse also includes many elements that go beyond the often state-centered claims by those advocating for an inter-governmental solution for internet governance. As the members of the internationalist discourse coalition were a very heterogeneous group of actors from a large variety of cultural and political contexts, also the groups of actors behind the digital sovereignty discourse are very diverse. While actors promoting narratives of digital sovereignty may be motivated by similar reasons, they do not necessarily share a common belief system or an understanding of what is meant by digital sovereignty. If we follow Hajer's understanding that a discourse coalition is composed of actors that do not need to share the same values or interests but, instead, employ and promote the same narratives and practices, we can safely state that we are currently witnessing the emergence of a global discourse coalition on digital sovereignty. Whether this coalition can thrive sufficiently in the coming years so as to challenge the multistakeholder discursive order and eventually replace it, will be discussed in the next section.

CONCLUDING REMARKS: TOWARD A NEW DISCURSIVE ORDER IN INTERNET GOVERNANCE?

The expansion of the digital sovereignty discourse in terms of actors, narratives, and scope of application raises a question about its capacity to become hegemonic in the near future. Does it hold the potential to both structure the understanding of digital technologies, services, and networks around a new “uncontested truth,” and to institutionalize new governance principles and power arenas? To find an answer to this, we identify and discuss four sets of conditions that could either support or weaken the emergence of a digital sovereignty discursive order. The analysis of these conditions emphasizes that discursive struggles are always embedded in actual political and geopolitical contexts, and are dependent on the interplay between groups of actors as well as formal and informal institutions.

The first set of conditions encompasses geopolitical trends. The economic crisis of 2008, the demographic decline in the United States and in Europe, the isolationist policies of the Trump administration, and the disorderly US withdrawal from Afghanistan have generated a perception of the decline of liberal democracies, while autocratic states such as China and Russia have strengthened their power, the former in terms of economic and technological

aspects, and the latter as a world energy power (Baldoni, 2024). This situation has led autocracies to openly contest the international liberal order, joined by a growing number of smaller states and emerging regional powers. The new geopolitical scenario has also sparked neo-mercantilist reactions in Western democracies that historically supported a digital development model linked to economic globalization. The sanctions adopted by both the Trump and Biden administrations toward Chinese digital champions—in particular the telecommunication equipment provider Huawei—exemplify this trend. Officially justified by national security concerns regarding potential backdoors in Chinese hardware, this ban is also clearly motivated by economic competition and industrial policy interests. Thus, it not only breaks with the globalization logic of the previous decades, but can also be seen as an indirect legitimization of the digital sovereignty discourse. The same can be said for the restructuring of global supply chains since the COVID-19 pandemic, which is inspired by principles of de-risking, decoupling, near-shoring, and friend-shoring. The escalation of these geopolitical tensions may strengthen the spread and structuration of the digital sovereignty discourse all over the world. However, if these tensions turn into an open conflict, the outcome may be different. As we have seen, the EU has developed a digital sovereignty discourse that, in many though not all regards, aligns with the motivations and, rather unintentionally, with some of the narratives of authoritarian regimes. Geopolitical confrontations, such as the Russian invasion of Ukraine, have the potential to revert this convergence and to bring Brussels again closer to Washington, for example, through coordination processes like the EU-US Trade and Technology Council. A similar trajectory has affected European partnerships with China in the context of the Belt and Road Initiative, which experienced a setback if not outright renunciation in the wake of increasing tensions between China and the United States.

A second set of conditions affecting the capacity of the digital sovereignty discourse to challenge the discursive order of multistakeholderism refers to the processes of securitization and the weaponization of digital technologies. Securitization implies that digital issues are reframed within a perspective focused on domestic and international security by linking them to narratives of existential threats and risks (Aljunied & Syed, 2020; Gorr & Schünemann, 2013). As such, it is conducive to a more prominent role for national governments in the global internet governance arena, for instance by pushing cybersecurity issues to the forefront (Claessen, 2020). Securitization can either fuel or deplete discourses on digital sovereignty. Indeed, an emphasis on security can lead to an understanding of internet governance as a zero-sum game, thus legitimizing conflictual approaches. In the opposite case, securitization can prompt various actors in the internet governance arena to seek international mechanisms to alleviate tensions occurring in cyberspace. Weaponization, instead, implies that digital networks and technologies increasingly become objects of exploitation for military purposes (Ortiz Freuler, 2023; Zittrain, 2017). For instance, the Snowden revelations brought to light how, since 2001, the US intelligence agencies covertly—and sometimes illegally—turned the internet as a global digital infrastructure mainly controlled by US private actors into an orchestrated instrument for mass surveillance activities. But instead of adopting and enforcing stricter regulation of digital state surveillance, several countries recently legitimized and politically authorized it through legislation. In the United States, the 2018 Clarifying Lawful Overseas Use of Data Act, also known as the CLOUD Act, compels US-based technology companies to provide data stored on their servers to federal agencies upon request. Similarly, the 2023 Chinese anti-espionage law allows national authorities to access the data and electronic devices of IT companies in China. These kinds of initiatives are likely to weaken the multi-stakeholder discursive order, which is based on the principle of separation between technical operations and digital public policy. Once the internet infrastructures become weaponized and are used for foreign and national security purposes, this separation becomes ineffective, thus endangering the multistakeholder compromise.

The third set of conditions refers to ongoing political dynamics within the internet governance field itself: Over the last decade or so, multistakeholder internet governance has been experiencing growing internal conflicts caused by increasingly obvious problems of coordination and the multiplication of policy venues. Since WSIS, numerous processes and initiatives have emerged that claim to advance multistakeholder internet governance, ranging from various UN-mandated working groups to high-level events initiated by members of the internet governance community, such as the Global Multistakeholder Meeting on the Future of Internet Governance (NETmundial). The resulting diversity and simultaneity of processes, which often overlap in terms of the issues covered and persons involved, cause frustration among participants and observers. While this has the effect of reducing both the shared beliefs and the commitment that characterized the early community of internet governance actors, it also makes space for those who criticize multistakeholder processes for lacking transparency, representativeness, and enforceable outcomes (Santaniello, 2021). At the same time, there is a growing importance for negotiation processes that take place in policy venues outside of the IGF and other traditional multistakeholder institutions. Some examples of this venue-shifting are newly-created forums that claim to use a multistakeholder format, such as the World Internet Conference (WIC), organized since 2014 by the Chinese government as an annual conference aiming at creating a new policy debate on internet governance revolving around the concept of cyber sovereignty. Meanwhile, established intergovernmental organizations such as the UN, the ITU and UNESCO regularly host conferences and conduct consultation processes under the official label of multistakeholderism, with the preparation of the “Global Digital Compact,” which is to be agreed upon during the UN Summit of the Future in September 2024, bearing witness to this trend. These kinds of processes, that involve input by nonstate actors without employing other principles such as bottom-up consensus-building and transparent decision-making, contribute to the multistakeholder principle being expanded to processes in which it is only governments who decide upon the final outcomes. But they also add to the acceptance of intergovernmental organizations as official venues for global digital policy-making. Thus, they also give ground to initiatives such as the Chinese proposal for a new Internet Protocol, which has worried many—not only because of its planned technical features, but because it was initially proposed at the ITU in 2018 and not in the context of the Internet Engineering Task Force (IETF), where new standards and protocols have been discussed and approved since the early days of the internet (Taylor et al., 2023). While the high attention paid to these new venues further challenges the multistakeholder discursive order, their focus on state authority also leads to resistance and renunciation by those actors who are torn between their ambitions for digital sovereignty and their longstanding support of multistakeholderism.

The fourth set of conditions is related to the changing borders of the policy field, and particularly to the rise of the concept of “digital governance” as something distinct from “internet governance.” Today, digital sovereignty discourses no longer focus primarily on the internet as the dominant digital networking technology. Instead, they have a much broader scope, reaching into policy fields that have always been more national than transnational. Measures designed to enhance the digital sovereignty of states and national economies may be part of economic, industrial, and security strategies that go far beyond the internet, targeting the digital transformation of entire sectors of the economy and society at large. For instance, digital sovereignty policies very often seek to enhance innovation and competition regarding key technologies of the future, such as artificial intelligence. Moreover, in democratic countries, digital sovereignty efforts also cover the promotion of digital competences and decision-making capacities of individuals in their roles as employees, consumers, and users of digital technologies and services (Pohle & Thiel, 2020). Thus, the discourse on sovereignty—like the entire debate on (national) digital policy—is increasingly moving away from the rhetoric of networks with its focus on decentralization and transnational coordination, thus even further endangering the consistency of the multistakeholder discursive order. A possible consequence of this shift is that actors who traditionally support

multistakeholder internet governance, for example, the EU and Brazil, may stay loyal to the multistakeholder order as far as the management of the DNS is concerned, but may, at the same time, contribute to the institutionalization of the digital sovereignty discourse elsewhere. This outcome would reduce the scope of multistakeholderism to technical coordination only, while most public policy issues would be reframed within a sovereigntist perspective—thereby reverting the thematic expansion of the internet governance field that occurred during WSIS. Moreover, considering that the multistakeholder discourse, compared with the digital sovereignty discourse, is more focused on decision-making procedures rather than the production of substantial results, there is the theoretical possibility of a new order emerging from the convergence between the two discourses. Especially in democratic regimes, like the EU, such a convergence could lead to a situation in which deliberation follows the principles of multistakeholderism (open consultations, representation of interests, etc.), while results are codified into sovereign acts like public policies, regulations, and laws, all decided upon by governments. Finally, it seems that the survival of the multistakeholder discursive order is more and more dependent on the capacity of the current mechanisms for technical coordination to work properly in ensuring the uniqueness and functioning of the internet. Indeed, although there is currently regulatory and economic fragmentation in digital global governance, no fragmentation on the technical level has occurred, and there is little indication that countries will try to break the interoperability of the various networks that make up the internet (Mueller, 2017; Pohle & Voelsen, 2022).

In conclusion, the possibility that the digital sovereignty discourse coalition can challenge and replace the multistakeholder discursive order is still to be tested in practice. Several interrelated factors will determine the outcome of this process. At the moment, the only certain thing is that the future of the internet, as well as its interplay with political regimes worldwide, is dependent on a multifaceted political struggle mainly conducted through the means of discursive and epistemic resources, such as narratives, definitions, and knowledge production.

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ENDNOTE

- ¹ The Working Group on Internet Governance (WGIG), established by the UN after the 2003 WSIS event, coined the official UN definition of internet governance, which was also included in the WSIS outcome documents: “the development and application by Governments, the private sector and civil society, in their respective roles, of shared principles, norms, rules, decision-making procedures, and programmes that shape the evolution and use of the Internet” (WSIS, 2005, art. 34).

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