

Challenges and Opportunities for US-China Collaboration on Artificial Intelligence Governance

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April 2025







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EXECUTIVE SUMMARY

In November 2023, the United States (US) and China recognized the need to address risks and opportunities posed by artificial intelligence (AI) technologies with formal US-China bilateral talks. Six months later, representatives from the two countries convened in Geneva for the first official bilateral dialogue on AI. Outcomes of these discussions have been modest, with the most significant advancement occurring in November 2024 when President Biden and President Xi jointly agreed to avoid giving AI control of nuclear weapons systems.

Since this development, President Trump's inauguration has brought a new approach to AI governance to the US, emphasizing the promotion of innovation and ensuring regulation does not inhibit the industry's advancement. Additionally, recent statements, such as Vice President Vance's remarks at the AI Action Summit in Paris, suggest that the Trump administration may prefer to move away from a multilateral approach to governance. The Trump administration has not yet indicated whether it plans to continue AI dialogues with China. This paper seeks to evaluate challenges and opportunities for US-China collaboration in AI governance over the next four years.

Bilateral cooperation on AI governance faces several challenges. Efforts to advance dialogue must coexist with a US-China industry relationship that continues to grow more competitive, with industry advancements such as the release of DeepSeek-R1 ratcheting up what has been referred to as an AI "arms race." Further, fundamental differences in governance priorities and approaches may complicate efforts to find common ground. Chinese and US policy statements reflect disagreements over the role of multilateral bodies like the United Nations in establishing and overseeing governance measures, as well as the values these governance measures should reflect.

In light of these challenges and early indicators of the Trump administration's approach to AI competition and collaboration, this paper outlines a menu of options to continue advancing US-China bilateral AI governance measures:

- Bilateral dialogue with China on military uses of AI: Building on the November 2024 agreement on the use of AI in nuclear command and control, the United States could launch an official US-China bilateral dialogue on establishing governance measures for military uses of AI.
- Leader-to-leader summit incorporating AI issues: President Trump has publicly expressed interest in traveling to China within the first 100 days of his administration, and in hosting President Xi in the United States. AI should be at the top of the agenda for a bilateral summit, which could serve as a forum for symbolic announcements or a catalyst for further dialogue.
- Track 1.5 and Track 2 dialogues featuring industry and technical SMEs: Incorporating more scientists and technical experts in Track 1.5 and Track 2 dialogues will ensure the identification of technical problems and solutions. US national laboratories, including the Cooperative Monitoring Center at Sandia National Laboratories, should play a key role in conducting outreach and facilitating future dialogues.
- Bilateral engagement with other US allies and partners: In the event that US-China collaboration on AI governance is not possible due to growing competition or deteriorating bilateral relations, this paper also highlights the United Kingdom and Japan as key partners the US could engage in an attempt to move the needle on international governance measures.

¹ JD Vance, "Remarks by the Vice President at the Artificial Intelligence Action Summit in Paris, France," Paris, France, 11 February 2025, accessed 3 March 2025, https://www.presidency.ucsb.edu/documents/remarks-the-vice-president-the-artificial-intelligence-action-summit-paris-france.

ACRONYMS AND DEFINITIONS

Abbreviation	Definition
Al	Artificial Intelligence
AI RMF	Al Risk Management Framework
APEC	Asia-Pacific Economic Cooperation
CMC	Cooperative Monitoring Center
EO	Executive Order
EU	European Union
G7	The Group of Seven
IAEA	International Atomic Energy Agency
ISO	International Organization for Standardization
LLM	Large Language Model
MOST	Ministry of Science and Technology
NAIAC	National Al Advisory Committee
NIST	National Institute for Standards and Technology
NSM	National Security Memorandum
OECD	Organisation for Economic Co-operation and Development
R&D	Research and Development
REAIM	Responsible Artificial Intelligence in the Military Domain
SME	Subject Matter Expert
UK	United Kingdom
UN	United Nations
US	United States

1. INTRODUCTION

Artificial intelligence's (AI) rapid advancement promises a transformative technology that will revolutionize most facets of society.² The continued progression of AI, defined as "a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations or decisions influencing real or virtual environments," is a highly competitive domain between global powers.³ Currently, generative AI—referring to AI models capable of producing complex original content—serves as the focal point of this competition.⁴ AI primacy is increasingly framed as essential for nations seeking to gain or maintain global technological dominance, with the US and China engaged in an ever-evolving struggle to ensure their position as the global AI leader.⁵

This high-stakes competition has raised concern about the potential for an AI "arms race" where governments and industry "cut corners and eschew safety research and regulation." Demonstrating this concern, a 2023 open letter signed by more than 1000 AI researchers and industry leaders called for a pause in the training of advanced AI systems to allow the development of shared safety measures. As the two leading AI superpowers, China and the US have an opportunity to work together to advance mutually beneficial AI governance measures addressing such issues as bias, accountability, autonomy, and privacy.

AI governance is understood as the framework of policies, regulations, and practices that guide AI development and use in a way that maximizes the technologies' benefits while mitigating its risks. In recent years, the US and China have begun to codify AI governance measures. Both nations have adopted domestic AI regulations and have sought to further bilateral and multilateral measures where common ground exists. This report considers the progress made thus far by the US and China to shape AI governance domestically and internationally, while also evaluating the challenges and opportunities for continued collaboration between both nations.

The paper begins by outlining US and Chinese domestic policies on AI governance, detailing relevant national legislation and policy statements. Subsequently, the paper summarizes the history of US-China bilateral engagement in AI governance, including both formal dialogue and informal Track 1.5 and Track 2 events, as well as both countries' involvement in promoting AI governance through multilateral channels. The paper concludes with a discussion of challenges to continued US-China collaboration in AI governance and opportunities for advancement of bilateral dialogue in line with US policies and priorities.

² Anu Bradford, "The Race to Regulate Artificial Intelligence," *Foreign Affairs*, 27 June 2023, accessed 20 March 2025, https://www.foreignaffairs.com/united-states/race-regulate-artificial-intelligence-sam-altman-anu-bradford.

³ US Department of State, "Artificial Intelligence (AI)," accessed 6 March 2025, https://www.state.gov/artificial-intelligence/.

⁴ Cole Stryker and Eda Kavlakoglu, "What is artificial intelligence (AI)," IBM, 9 August 2024, accessed 27 March 2025, https://www.ibm.com/think/topics/artificial-intelligence.

⁵ Reva Goujon, "The Real Stakes of the AI Race," Foreign Affairs, 27 December 2024, accessed 26 March 2025, https://www.foreignaffairs.com/united-states/real-stakes-ai-race.

⁶ Sam Meacham, "A Race to Extinction: How Great Power Competition Is Making Artificial Intelligence Existentially Dangerous," Harvard International Review, 8 September 2023, accessed 27 March 2025, https://hir.harvard.edu/a-race-to-extinction-how-great-power-competition-is-making-artificial-intelligence-existentially-dangerous/.

⁷ Cade Metz and Gregory Schmidt, "Elon Musk and Others Call for Pause on A.I., Citing 'Profound Risks to Society'," *The New York Times*, 29 March 2023, accessed 27 March 2025, <a href="https://www.nytimes.com/2023/03/29/technology/ai-artificial-intelligence-musk-risks.html#:~:text=Technology-ai-artificial-intelligence-musk-risks-risks-risks-risks-risks-risks-risks-ri

[,] Elon%20 Musk%20 and%20 Others%20 Call%20 for%20 Pause%20 on%20 A.I.%2C%20 Citing, most%20 powerful%20 artificial%20 intelligence%20 systems.

2. US DOMESTIC POLICY ON AI GOVERNANCE

The United States' most significant national legislation addressing AI development and use is the National Artificial Intelligence Initiative Act of 2020, also known as the American AI Initiative.⁸ The Act, passed in 2021 as part of the Fiscal Year 2021 National Defense Authorization Act, establishes a government-wide initiative to accelerate AI research and application in the national interest. Building on 2019 and 2020 Executive Orders (EOs) from President Donald Trump, the initiative's stated purpose is to ensure US global leadership in AI and promote the development of trustworthy AI through existing and new government bodies.^{9,10}

Among the new bodies created by the Initiative are the National AI Initiative Office and the National AI Advisory Committee (NAIAC), the former serving as a focal point for initiative activities across the federal government and the latter acting as a technical advisor for the office and the US president.¹¹ The NAIAC, comprised of members appointed by the Secretary of Commerce with interdisciplinary expertise from private industry, academia, civil society, and the nation's research ecosystem, advises on matters including US competitiveness in AI and potential impacts of broad AI adoption. There is a duty for the NAIAC to provide advice relating to oversight and regulation of AI systems; however, governance measures or approaches beyond "complying with existing laws" and "advancing innovation while protecting individual rights" are not explicit mandates for the committee.¹²

In addition to establishing new government bodies, the American AI Initiative also directs several government agencies to pursue activities likely to shape the US approach towards AI governance. Most notably, the Initiative directs the National Institute of Standards and Technology (NIST) to establish AI "frameworks, standards, and guidelines." Under this direction, NIST published the AI Risk Management Framework (AI RMF) in 2023 and released a companion resource focused on generative AI in 2024. The NIST AI RMF is intended as a resource for organizations designing, developing, or deploying AI systems to manage risks and promote trustworthy AI. The Framework identifies governance as a core function to enabling AI risk management, distilling the function into several categories and suggested actions organizations may adopt and is likely to see future alignment with standards from international standard-setters like the International Organization for Standardization (ISO). While the AI RMF is the United States' most robust approach to AI governance to date, the Framework provides limited guidance in addressing the risks it helps identify. Part of this is due to the AI RMF's intention as a "voluntary, non-sector specific" resource

⁸ William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Public Law No. 116-283, 134 Stat. 3388 (2021), accessed 4 February 2025, https://www.congress.gov/116/plaws/publ283/PLAW-116publ283.pdf.

⁹ Executive Order No. 13859, "Maintaining American Leadership in Artificial Intelligence," Federal Register 84, No. 31 (11 February 2019), accessed 4 February 2025, https://www.govinfo.gov/content/pkg/FR-2019-02-14/pdf/2019-02544.pdf.

¹⁰ Executive Order No. 13960, "Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government," Federal Register 85, No. 236 (3 December 2020), accessed 4 February 2025, https://www.govinfo.gov/content/pkg/FR-2020-12-08/pdf/2020-27065.pdf.

¹¹ National Defense Authorization Act for Fiscal Year 2021, sec. 5104.

¹² National Defense Authorization Act for Fiscal Year 2021, sec. 5104.

¹³ National Defense Authorization Act for Fiscal Year 2021, sec. 5301.

¹⁴ National Institute of Standards and Technology, *Artificial Intelligence Risk Management Framework (AI RMF 1.0)* (2023), NIST AI 100-1, accessed 4 February 2025, https://nvlpubs.nist.gov/nistpubs/ai/nist.ai.100-1.pdf.

¹⁵ National Institute of Standards and Technology, Artificial Intelligence Risk Management Framework: Generative Artificial Intelligence Profile (2024), NIST AI 600-1, accessed 4 February 2025, https://nvlpubs.nist.gov/nistpubs/ai/NIST.AI.600-1.pdf.

¹⁶ National Institute of Standards and Technology, "Roadmap for the NIST Artificial Intelligence Risk Management Framework (AI RMF 1.0)," accessed 4 February 2025, https://airc.nist.gov/AI_RMF_Knowledge_Base/Roadmap.

that prioritizes flexible guidance over specifics.¹⁷ As a result, the AI RMF's ability to effectively establish governance structures that manage AI risks remains untested.

Following the passage of the American AI Initiative, President Biden signed the 2023 EO 14110, A Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence, to set national principles and priorities for governing AI development in a safe and responsible manner. ¹⁸ Although the EO has since been rescinded by the incoming Trump administration, it originally complemented the National AI Initiative by ordering federal agencies like NIST to carry out actions codified in the Initiative while also outlining additional activities to promote AI safety and security, reduce AI risks to national interests like critical infrastructure, and strengthen US global leadership in AI. In this last regard, the EO directs executive agencies to identify global engagements to advance understanding of existing and anticipated US AI policies, lead efforts to establish international frameworks for managing AI risks, and advance global technical standards for responsible AI development.

An example of US leadership in promoting responsible AI use stemming from this EO is the US-led Political Declaration on Responsible Military Use of Artificial Intelligence and Autonomy, endorsed by 55 nations committed to ensuring military AI capabilities are used in a manner that upholds international law, promotes accountability, and prioritizes human oversight. An additional outcome of EO 14110 was National Security Memorandum 25 (NSM-25) that "provides further direction on harnessing [AI]...in the context of national security...while protecting...liberties, privacy, and safety...". NSM-25 directs the US Government to develop and implement robust AI governance practices domestically and internationally that support U.S. national security. However, given NSM-25's recent publication and the subsequent change in administrations, it is unclear if outstanding memorandum directives, including development of a "strategy for the advancement of international AI governance norms in line with safe, secure, and trustworthy AI," will be completed.²¹

In 2025, President Trump issued EO 14179, Removing Barriers to American Leadership in Artificial Intelligence, that directs a US policy of sustaining and enhancing the United States' global AI dominance. ²² The EO directs development of a new national AI Action Plan to achieve the EO's stated policy and revokes EO 14110. While most tasks imposed by EO 14110 were already complete, all policies, regulations and actions associated with the previous EO are now subject to review and alignment with the incoming administration's AI policy. It is presently unclear what impact the new AI Action Plan will have on the US approach to AI governance and what policies directed under EO 14110 will remain in effect. However, the objective of EO 14179 is similar to those of the 2019 and 2020 EOs that precipitated the National AI Initiative, particularly in its emphasis of reducing or removing regulatory barriers to AI development and implementation to ensure continued US global leadership in AI.

¹⁸ Executive Order No. 14110, "Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence," Federal Register 88, No. 210 (1 November 2023), accessed 4 February 2025, https://www.govinfo.gov/content/pkg/FR-2023-11-01/pdf/2023-24283.pdf.

¹⁷ NIST, *AI RMF 1.0*, pg. 7.

¹⁹ US Department of State, "Political Declaration on Responsible Military Use of Artificial Intelligence and Autonomy" (9 November 2023), Bureau of Arms Control, Deterrence, and Stability, accessed 4 February 2025, https://www.state.gov/bureau-of-arms-control-deterrence-and-stability/political-declaration-on-responsible-military-use-of-artificial-intelligence-and-autonomy.

²⁰ National Security Memorandum 25, "Advancing the United States' Leadership in Artificial Intelligence; Harnessing Artificial Intelligence to Fulfill National Security Objectives; and Fostering the Safety, Security, and Trustworthiness of Artificial Intelligence," (24 October 2024), accessed 26 March 2025, https://www.govinfo.gov/content/pkg/DCPD-202400945/pdf/DCPD-202400945.pdf

²¹ NSM-25. "Harnessing AI." Pg. 18.

²² Executive Order No. 14179, "Removing Barriers to American Leadership in Artificial Intelligence," Federal Register 90, No. 20 (23 January 2025), accessed 4 February 2025, https://www.govinfo.gov/content/pkg/FR-2025-01-31/pdf/2025-02172.pdf.

Vice President JD Vance reiterated this position in a February 2025 speech at the Artificial Intelligence Action Summit in Paris, France, stating that excessive regulation could not only disproportionately hurt current AI leaders like the US, but "paralyz[e]" further AI development."²³ Despite the incoming administration's priority of expanding AI opportunity, Vice President Vance welcomed an international regulatory regime that "fosters the creation of AI technology, rather than strangles it."²⁴ This position indicates the new US AI Action Plan will focus less on policies emphasizing responsible AI development but will likely not end activities that promote US leadership in AI, including efforts to align NIST's AI RMF with international standards and other efforts taken by the US to advance international AI governance measures.

3. CHINA'S DOMESTIC POLICY ON AI GOVERNANCE

China has sought to codify its vision for AI governance through a series of policy papers and declarations. While these documents vary in form and scope, they are remarkably consistent in message. Three key themes emerge. First, China espouses a clear preference for the United Nations as the primary venue for the development and oversight of international AI governance measures. Second, Chinese policies repeatedly highlight the necessity to involve "fellow developing countries" in AI governance dialogue. Finally, while China expresses support for international engagement on a myriad of AI safety and security issues, it also emphasizes that global governance measures must respect the national values and policies of every country.

In 2019, the National New Generation Artificial Intelligence Governance Expert Committee under the Ministry of Science and Technology (MOST) released the Governance Principles for a New Generation of Artificial Intelligence. The document outlined eight principles for AI development: 1) harmony and friendliness; 2) fairness and justice; 3) inclusivity and sharing; 4) respect privacy; 5) secure/safe and controllable; 6) shared responsibilities; 7) open collaboration; and 8) agile governance. Taken together, these principles advance a vision of AI governance in which states actively collaborate to promote safe and secure AI, while deferring to national sovereignty by practicing "full respect for each country's principles and practices."²⁵

The 2022 Position Paper of the People's Republic of China on Strengthening Ethical Governance of Artificial Intelligence advances similar themes. The paper outlines governments' responsibilities to: enact regulations based on AI ethical norms, require R&D entities to strive to make AI verifiable, regulatable, traceable, predictable, and trustworthy, while also safeguarding privacy and data security in AI products and services. In the final section on international cooperation, the paper calls on the international community to "formulate widely accepted international AI governance frameworks, standards and norms while fully respecting the principles and practices of different countries' AI governance," again emphasizing the importance of state sovereignty. ²⁶

In October 2023, China established the Global AI Governance Initiative. The initiative outlines China's suggestions for the international community as states begin the process of engaging in

²³ Vance, "Artificial Intelligence Action Summit."

²⁴ Vance, "Artificial Intelligence Action Summit."

²⁵ Lorand Laskai and Graham Webster, "Translation: Chinese Expert Group Offers 'Governance Principles' for 'Responsible AI'," New America (17 June 2019), accessed 4 February 2025, https://www.newamerica.org/cybersecurity-initiative/digichina/blog/translation-chinese-expert-group-offers-governance-principles-responsible-ai/.

²⁶ Ministry of Foreign Affairs of the People's Republic of China, "Position Paper of the People's Republic of China on Strengthening Ethical Governance of Artificial Intelligence (AI)," last updated 17 November 2022, accessed 4 February 2025, https://www.fmprc.gov.cn/eng/zy/wjzc/202405/t20240531 11367525.html.

dialogue and exchange on global AI governance.²⁷ Among these suggestions, China highlights the necessity of "broad consensus" in international AI governance with "full respect for differences in policies and practices among countries."²⁸ The document also stresses the need to increase the representation of developing countries in global AI governance, a goal that China has made a priority through activities such as hosting AI capacity-building programs and launching education and training initiatives.²⁹ Of particular interest, China expresses support for "discussions within the United Nations framework to establish an international institution to govern AI."³⁰

China's most recent national statement on international AI governance is the July 2024 Shanghai Declaration.³¹ The declaration strikes a similar tone to previous policies, noting that China will promote AI development and the adoption of AI norms and guidelines while urging the international community to "respect [countries'] economic and social systems, religious and cultural traditions and values in carrying out international cooperation on AI technologies, products and applications."³² Section three of the document identifies the United Nation as the main channel for AI governance and highlights the need to increase the representation of developing countries.

4. US-CHINA BILATERAL ENGAGEMENT ON ARTIFICIAL INTELLIGENCE

At the Woodside Summit in November 2023, recognition of the mounting risks posed by AI technologies led President Biden and President Xi to "affirm the need to ... improve AI safety through US-China government talks." These talks came to fruition in May 2024, when representatives from the United States and China convened in Geneva, Switzerland for the first official bilateral dialogue on AI. The meetings featured broad interagency representation from the United States including the National Security Council, the Department of State, and the Department of Commerce. The Chinese delegation included the Ministry of Foreign Affairs, Ministry of Science and Technology, National Development and Reform Commission, Cyberspace Administration of China, Ministry of Industry and Information Technology, and the Chinese Communist Party Office of the Central Foreign Affairs Commission.

Despite a "candid and constructive discussion," substantive outcomes of the May 2024 dialogue were limited. ³⁵ Post-meeting readouts from the US and China highlighted key differences in the two countries' positions. While the United States used its statement to highlight China's "misuse of AI," the Chinese readout criticized US "restrictions and pressures" in the AI field, likely referring to the extensive US campaign of export controls intended to curb China's access to advanced AI

²⁷ Ministry of Foreign Affairs of the People's Republic of China, "Global AI Governance Initiative," last updated 20 October 2023, accessed 4 February 2025, https://www.mfa.gov.cn/eng/zy/gb/202405/t20240531_11367503.html.
https://www.mfa.gov.cn/eng/zy/gb/202405/t20240531_11367503.html.
https://www.mfa.gov.cn/eng/zy/gb/202405/t20240531_11367503.html.

²⁹ Ministry of Foreign Affairs of the People's Republic of China, "AI Capacity-Building Action Plan for Good and for Al," last updated 27 September 2024, accessed 4 February 2025, https://www.mfa.gov.cn/eng/wjbzhd/202409/t20240927 11498465.html. ³⁰ Ministry of Foreign Affairs of the People's Republic of China, "Global AI Governance Initiative."

³¹ Ministry of Foreign Affairs of the People's Republic of China, "Full text: Shanghai Declaration on Global AI Governance," last updated 4 July 2024, accessed 4 February 2025, https://www.fmprc.gov.cn/eng/zy/gb/202407/t20240704 11448351.html.

³² Ministry of Foreign Affairs of the People's Republic of China, "Shanghai Declaration on Global AI Governance."

³³ The White House, "Readout of President Joe Biden's Meeting with President Xi Jinping of the People's Republic of China," 15 November 2023, accessed 4 February 2025, https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2023/11/15/readout-of-president-joe-bidens-meeting-with-president-xi-jinping-of-the-peoples-republic-of-china-2/.

³⁴ The White House, "Statement from NSC Spokesperson Adrienne Watson on the US-PRC Talks on AI Risk and Safety," 15 May 2024, accessed 4 February 2025, https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2024/05/15/statement-from-nsc-spokesperson-adrienne-watson-on-the-u-s-prc-talks-on-ai-risk-and-safety-2/.

³⁵ The White House, "US-PRC Talks on AI Risk and Safety."

technologies.³⁶ Other differences were more subtle –the Chinese statement called for global AI governance, including a governance framework and standards, with the United Nations playing a lead role. This language is consistent with China's longstanding position that AI global governance should take a multistakeholder approach and utilize the United Nations as a primary oversight body – a position that is likely intended to prevent the United States from achieving "unchallenged control over global AI safety standards."³⁷ While the US readout also emphasized achieving global consensus on the practice of safe, secure, and trustworthy AI, there was no mention of the potential role of the United Nations or other international bodies.³⁸

Direct follow-up from the May 2024 bilateral dialogue was initially limited. In September 2024, US National Security Adviser Jake Sullivan discussed AI safety and risk with President Xi during a trip to China.³⁹ The trip readout did not list specific takeaways on AI or other topics but noted that President Biden and President Xi would plan a call for "the coming weeks."⁴⁰

US-China AI talks culminated in a significant breakthrough in November 2024. During President Biden and President Xi's final meeting on the sidelines of the Asia-Pacific Economic Cooperation (APEC) summit, the leaders agreed to avoid giving artificial intelligence control of nuclear weapons systems. ⁴¹ The United States previously committed to maintain human control over the decision to use nuclear weapons in a joint document submitted with France and the United Kingdom (UK) during the 2022 Nuclear Nonproliferation Treaty review process. ⁴² US officials had publicly urged China (and Russia) to follow suit, with hopes that agreement on this point could be an early outcome of the May 2024 dialogues. ⁴³ The decision in November represented the Biden administration's final effort to achieve substantive progress on bilateral governance measures prior to leaving office.

Thus far, the Trump administration has not commented on whether it will seek to continue AI safety and security dialogues with China. The early days of the administration have brought a heightened focus on US-China frontier AI competition with the unveiling of Chinese AI startup DeepSeek-R1 and US investments in major joint ventures like Stargate.⁴⁴ It remains to be seen whether there will be appetite on either side to build upon the modest advances made under the Biden administration.

³⁶ 宽广太平洋, "China and the United States hold first intergovernmental dialogue on artificial intelligence," 14 May 2024, accessed 3 March 2025, https://web.archive.org/web/20240926155400/https://mp.weixin.qq.com/s/WqP-wzvkNpIFgakUnfeGhQ.

³⁷ Joanna Costigan, "US, China Don't Agree on Much at AI Talks, But Share AI Safety Concerns," *Forbes*, 20 May 2024, accessed 4 February 2025, https://www.forbes.com/sites/johannacostigan/2024/05/20/us-china-dont-agree-on-much-at-ai-talks-but-share-ai-safety-concerns/.

³⁸ The White House, "US-PRC Talks on AI Risk and Safety."

³⁹ The White House, "Readout of National Security Advisor Jake Sullivan's Meeting with President Xi Jinping of the People's Republic of China," 29 August 2024, accessed 4 February 2025, https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2024/08/29/readout-of-national-security-advisor-jake-sullivans-meeting-with-president-xi-jinping-of-the-peoples-republic-of-china/">https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2024/08/29/readout-of-national-security-advisor-jake-sullivans-meeting-with-president-xi-jinping-of-the-peoples-republic-of-china/.

⁴⁰ The White House, "Jake Sullivan's Meeting with President Xi Jinping."

⁴¹ Lauren Egan and Phelim Kine, "Biden's Final Meeting With Xi Jinping Reaps Agreement On AI And Nukes," *Politico*, 16 November 2024, accessed 4 February 2025, https://www.politico.com/news/2024/11/16/biden-xi-jinping-ai-00190025.

⁴² Alice Saltini and Yanliang Pan, "Beyond Human-in-the-Loop: Managing AI Risks in Nuclear Command-and-Control," *War on the Rocks*, 6 December 2024, accessed 4 February 2025, https://warontherocks.com/2024/12/beyond-human-in-the-loop-managing-ai-risks-in-nuclear-command-and-control/.

⁴³ Greg Torode, "US Official Urges China, Russia To Declare Only Humans, Not AI, Control Nuclear Weapons," *Reuters*, 2 May 2024, accessed 4 February 2025, https://www.reuters.com/world/us-official-urges-china-russia-declare-only-humans-not-ai-control-nuclear-2024-05-02/.

⁴⁴ Scott Singer, "DeepSeek and Other Chinese Firms Converge with Western Companies on AI Promises," Carnegie Endowment for International Peace, 28 January 2025, accessed 4 February 2025, https://carnegieendowment.org/research/2025/01/deepseek-and-other-chinese-firms-converge-with-western-companies-on-ai-promises?lang=en.

Supplementing official bilateral talks is a series of Track 1.5 and Track 2 engagements featuring nongovernmental stakeholders. According to the 2024 "State of AI Safety in China Report," there have been eight Track 1.5 or Track 2 US-China dialogues hosted on AI topics since 2022, with two of those engagements focused specifically on frontier AI safety and governance. ⁴⁵ The Brookings Institute and the Center for International Security and Strategy at Tsinghua University have jointly hosted Track 2 dialogues on AI in national security for more than five years. ⁴⁶ A particularly useful outcome from the engagements has been the rolling publication of an AI terms glossary, helping US and Chinese stakeholders to reach a shared understanding of concepts central to future negotiations.

While Track 1.5 and Track 2 engagements are useful in setting the stage for further official talks, current efforts are limited in scope. Most existing dialogues focus on participants from foreign policy or military backgrounds, with industry and technical experts underrepresented.⁴⁷ As these engagements are non-binding and lack enforcement mechanisms, they are best utilized as a precursor or supplement to official dialogue. However, in the event that growing US-China competition in the AI domain curtails official talks, Track 1.5 and Track 2 dialogues may serve as a stopgap to allow conversations on critical issues in AI governance to continue.

5. ENGAGEMENT IN MULTILATERAL AI GOVERNANCE EFFORTS

In addition to bilateral talks, both the US and China have contributed to multilateral efforts on AI topics, sometimes in tandem. Participation in multilateral governance efforts has helped to lay the groundwork for bilateral dialogue by building mutual trust and demonstrating which facets of AI governance each country may be interested in exploring. For example, China's participation in the November 2023 AI Safety Summit and signing of the Bletchley Declaration, along with the United States and 26 other countries, provided an early sign of China's willingness to engage on AI safety. The Declaration stresses the importance of a proportionate regulatory approach and sets an agenda for addressing frontier AI risk through identifying and building a shared scientific understanding of safety risks. Some analysts have suggested that China's decision to sign the Bletchley Declaration, along with its involvement in bilateral dialogues on AI with both the US and France in 2024, "indicates a growing convergence of views on AI safety among major powers compared to early 2023."

The United Nations has also served as a forum for US-China collaboration on multilateral AI governance proposals. Although the US has taken a more cautious approach towards endorsing the UN as a primary body for AI governance, it has nevertheless engaged in and even spearheaded initiatives under the UN auspices. In March 2024, the US sponsored the first UN resolution on AI, Seizing the Opportunities of Safe, Secure, and Trustworthy Artificial Intelligence Systems for

⁴⁵ Concordia AI, *The State of AI Safety in China: Spring 2024 Report*, 14 May 2024, accessed 4 February 2025, https://concordia-ai.com/wp-content/uploads/2024/05/State-of-AI-Safety-in-China-Spring-2024-Report-public.pdf?utm_source=substack&utm_medium=email.

⁴⁶ Ryan Hass and Colin Kahl, "Laying the Groundwork for US-China AI Dialogue," *Brookings*, 5 April 2024, accessed 4 February 2025, https://www.brookings.edu/articles/laying-the-groundwork-for-us-china-ai-dialogue/.

⁴⁷ Yanzi Xu and Sun Chenghao, "The US-China AI Dialogue Would Benefit From More Stakeholders," Center for Data Innovation, 5 June 2024, accessed 4 February 2025, https://datainnovation.org/2024/06/the-u-s-china-ai-dialogue-would-benefit-from-more-stakeholders/.

⁴⁸ UK Government, "The Bletchley Declaration by Countries Attending the AI Safety Summit," 1 November 2023, accessed 4 February 2025, https://www.gov.uk/government/publications/ai-safety-summit-2023-the-bletchley-declaration/the-bletchley-declaration/by-countries-attending-the-ai-safety-summit-1-2-november-2023.

⁴⁹ Concordia AI, The State of AI Safety in China.

Sustainable Development.⁵⁰ The resolution was co-sponsored by 123 countries, including China.⁵¹ In July, the US actively supported a Chinese-sponsored resolution to close the gap between developed and developing countries in the use of AI technologies.⁵² The Chinese Ambassador to the UN publicly acknowledged US support, saying, "We're very appreciative of the positive role that the US has played in this whole process."⁵³

It is important to note that not all multilateral initiatives have received joint support from the US and China. The US is an original adherent to the Organisation for Economic Co-operation and Development's (OECD) AI Principles adopted in 2019 and considered the first intergovernmental standard on AI.⁵⁴ China has not indicated its adherence to the OECD AI Principles despite being one of the organization's key partners, indicating the principles and recommended national policies may diverge from Chinese interest. While both countries participated in the February 2023 Summit on Responsible Artificial Intelligence in the Military Domain (REAIM 2023), China ultimately declined to sign the November 2023 US-proposed Political Declaration on Responsible Military Use of Artificial Intelligence and Autonomy. The Declaration provides a normative framework for the development and use of military AI capabilities, including autonomous systems, emphasizing that military AI capabilities must be principled, accountable, and compliant with international humanitarian law.⁵⁵

The Chinese delegation did not publicly detail a reason for its decision not to sign the REAIM agreement, instead emphasizing that major powers "should adopt a prudent and responsible attitude when utilizing relevant technologies." ⁵⁶ China's unwillingness to sign the declaration may reflect a reluctance to limit its military use options. ⁵⁷ However, its decision one year later to jointly agree with the United States to limit the use of AI in nuclear command and control demonstrates that China's positions on military uses of AI may have red lines.

Additionally, much of the United States' effort to establish multilateral governance measures has been executed through the G7, of which China is not a member. The G7 provides a forum for the US to advance AI governance principles closely linked to human rights and democratic values. The May 2023 G7 Hiroshima Process on Generative AI, for example, culminated in two standards setting documents, one focused on guiding principles (the Hiroshima Process International Guiding Principles for Organizations Developing Advanced AI Systems) and the other a code of conduct (the Hiroshima Process International Code of Conduct for Organizations Developing Advanced AI

⁵⁰ United Nations, "General Assembly Adopts Landmark Resolution on Steering Artificial Intelligence towards Global Good, Faster Realization of Sustainable Development," 21 March 2024, accessed 4 February 2025, https://press.un.org/en/2024/ga12588.doc.htm.

⁵¹ Edith Lederer, "The UN Adopts A Resolution Backing Efforts To Ensure Artificial Intelligence Is Safe," *Associated Press*, updated 22 March 2024, accessed 4 February 2025, https://apnews.com/article/united-nations-artificial-intelligence-safety-resolution-vote-8079fe83111cced0f0717fdecefffb4d.

⁵² Edith Lederer, "UN Adopts Chinese Resolution With US Support On Closing The Gap In Access To Artificial Intelligence,"

*Associated Press, updated 2 July 2024, accessed 4 February 2025, https://apnews.com/article/un-china-us-artificial-intelligence-access-resolution-56c559be7011693390233a7bafb562d1.

⁵³ Lederer, "UN Adopts Chinese Resolution With US Support."

⁵⁴ OECD, "OECD Principles on Artificial Intelligence," adopted 22 May 2019, amended 3 May 2024, accessed 28 March 2025, https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0449.

⁵⁵ US Department of State, "Responsible Military Use of Artificial Intelligence."

⁵⁶ "Chinese delegation elaborates on China's principles of AI governance at summit," *Global Times*, 12 September 2024, accessed 27 March 2025, https://www.globaltimes.cn/page/202409/1319689.shtml.

⁵⁷ Amber Wang, "US-Led AI Declaration On Responsible Military Use Sees 45 Countries Join, But Not China," *South China Morning Post*, 14 November 2023, updated 14 November 2023, accessed 4 February 2025, https://www.scmp.com/news/china/article/3241415/us-led-ai-declaration-responsible-military-use-sees-45-countries-join-not-china.

Systems).⁵⁸ Discussions on the risks and opportunities of AI have continued to top the agenda of G7 summits in 2024.⁵⁹

In a major step forward in international AI governance, the United States signed the first global, legally binding AI treaty in September 2024. The Framework Convention on Artificial Intelligence and Human Rights, Democracy, and the Rule of Law was drafted over the course of five years by 57 countries, including the 46 member states of the Council of Europe, its five observer states, and non-member states Australia, Argentina, Costa Rica, Israel, Peru, and Uruguay. The Framework Convention aims to "complement existing standards on human rights, democracy, and the rule of law" by requiring states to uphold fundamental principles, implement remedies and safeguards, and adhere to risk management requirements. While the Framework Convention lacks an enforcement mechanism, its member states are obligated to participate in monitoring measures to determine compliance. China was not involved in the negotiation process for the treaty and has not indicated an intention to sign the agreement.

6. CHALLENGES TO FURTHER US-CHINESE COLLABORATION

6.1. Competition in the Al Sector

Efforts to advance dialogue between the US and China on AI governance must coexist with a US-China industry relationship that continues to grow more competitive. In the early days of the administration, President Trump has prioritized enhancing US industry competitiveness through encouraging investment and reevaluating existing regulations. In January, he unveiled Stargate, a \$500 billion private sector investment in AI infrastructure, alongside the CEOs of SoftBank, OpenAI, and Oracle. Also in January, the Trump administration enacted an Executive Order on Removing Barriers to American Leadership in AI with the goal of eliminating "harmful barriers to America's AI leadership."

In a February speech at the Artificial Intelligence Action Summit in France, Vice President Vance summed up the administration's approach to AI competition, stating "the United States of America is the leader in AI, and our administration plans to keep it that way." The US declined to sign the summit's Statement on Inclusive and Sustainable AI for People and the Planet, while China and 57 other countries ultimately signed the joint statement. The China and 57 other countries ultimately signed the joint statement.

⁵⁸ The White House, "G7 Leaders' Statement on the Hiroshima AI Process," 30 October 2023, accessed 4 February 2025, https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2023/10/30/g7-leaders-statement-on-the-hiroshima-ai-process/.

⁵⁹ Mark Scott and Gian Volpicelli, "G7 Leaders To Talk Both AI's Risks And Opportunities At Summit," *Politico*, 13 June 2024, accessed 4 February 2025, https://www.politico.eu/article/g7-summit-italy-artificial-intelligence-risks-opportunities-giorgia-meloni/. ⁶⁰ Council of Europe, *Framework Convention On Artificial Intelligence*, 5 September 2024, accessed 4 February 2025, https://rm.coe.int/aiconvention-brochure/1680afaeba.

⁶¹ Council of Europe, Framework Convention On Artificial Intelligence.

⁶² Steve Holland, "Trump announces private-sector \$500 billion investment in AI infrastructure," *Reuters*, 21 January 2025, accessed 3 March 2025, https://www.reuters.com/technology/artificial-intelligence/trump-announce-private-sector-ai-infrastructure-investment-cbs-reports-2025-01-21/.

⁶³ The White House, "Fact Sheet: President Donald J. Trump Takes Action to Enhance America's AI Leadership," 23 January 2025, accessed 3 March 2025, https://www.whitehouse.gov/fact-sheets/2025/01/fact-sheet-president-donald-j-trump-takes-action-to-enhance-americas-ai-leadership/.

⁶⁴ JD Vance, "Artificial Intelligence Action Summit."

⁶⁵ Dan Milmon and Eleni Courea, "US and UK refuse to sign Paris summit declaration on 'inclusive' AI," The Guardian, 11 February 2025, accessed 6 March 2025, https://www.theguardian.com/technology/2025/feb/11/us-uk-paris-ai-summit-artificial-intelligence-declaration.

Increasingly, however, US AI dominance is threatened by Chinese advances. Over the past five years, US industry has been widely recognized as the world leader in generative AI, with Chinese large language model (LLM) developers perceived as years behind US firms. 66 This commonly accepted wisdom was upended in January 2025 with the release of DeepSeek-R1, an open-source generative AI model from Chinese company DeepSeek with capabilities on par with US alternatives developed at a lower cost and using less computing power.⁶⁷

Since its release, DeepSeek-R1 has experienced rapid adoption due in part to its open-source nature. 68 This openness lets anyone utilize, study, or improve the model, driving innovation that benefits DeepSeek at no added cost. Conversely, most "comparable [US] AI models are proprietary" and therefore closed.⁶⁹ While this approach allows leading US AI companies to maintain their competitive advantage, it may slow overall US innovation. As the incoming Trump administration formulates its AI policy, promoting open-source AI models may be a way to further advancement, particularly in academic and research environments where the low cost and lower entry barriers of open-source models are especially attractive.

The unveiling of DeepSeek-R1 sent shock waves through the US stock market and was likened by some as a "Sputnik Moment" for the AI industry. 70 President Trump described its release as a "wakeup call for [US] industries that we need to be laser-focused on competing to win." This emphasis on competition may make both sides reluctant to pursue governance measures, particularly measures that impose limits on industry stakeholders.

6.2. The Need for an International Governance Body and the Role of the

Since at least 2023, China has consistently espoused that the United Nations should serve as the main channel for AI governance development and oversight. The UN's role in global AI governance and potential scope of responsibilities has been debated extensively. One popular proposal has suggested that the International Atomic Energy Agency (IAEA), an autonomous international organization under the UN system tasked with promoting peaceful uses of nuclear energy, could serve as a model for an agency focused on AI safety and security.⁷² Critics of this approach emphasize that there are key differences between AI and nuclear technologies, including the intangible nature of AI and the lack of an existential threat on par with a nuclear weapon.⁷³

In October 2023, the UN itself weighed in on the issue. The United Nations System White Paper on AI Governance summarized the UN's current institutional framework for AI governance measures and

⁶⁶ Andrew Singer, "Stakes Rising In The US-China AI Race," Global Finance, 9 September 2025, accessed 3 March 2025, https://gfmag.com/economics-policy-regulation/us-china-competition-generative-ai/.

⁶⁷ Matt Sheehan and Scott Singer, "What DeepSeek Revealed About the Future of US-China Competition," Foreign Policy, 3 February 2025, accessed 3 March 2025, https://foreignpolicy.com/2025/02/03/deepseek-china-ai-artificial-intelligence-united-states-techcompetition/.

⁶⁸ Jared Dunnmon, "The Real Threat of Chinese AI," Foreign Affairs, 28 February 2025, accessed 27 March 2025, https://www.foreignaffairs.com/china/real-threat-chinese-ai.

⁶⁹ Dunnmon, "The Real Threat of Chinese AI."

⁷⁰ John Ruwitch, "DeepSeek: Did a little known Chinese startup cause a 'Sputnik moment' for AI?" NPR, 28 January 2025, accessed 3 March 2025, https://www.npr.org/2025/01/28/g-s1-45061/deepseek-did-a-little-known-chinese-startup-cause-a-sputnik-momentfor-ai.

^{71 &}quot;Trump: DeepSeek's AI should be a 'wakeup call' to US industry," Reuters, 28 January 2025, accessed 3 March 2025, https://www.reuters.com/world/us/trump-deepseeks-ai-should-be-wakeup-call-us-industry-2025-01-27/.

⁷² Michelle Nichols, "UN chief backs idea of global AI watchdog like nuclear agency," Reuters, 12 June 2025, accessed 3 March 2025, https://www.reuters.com/technology/un-chief-backs-idea-global-ai-watchdog-like-nuclear-agency-2023-06-12/.

⁷³ Yasmin Afina and Patricia Lewis, "The nuclear governance model won't work for AI," Chatham House, 3 July 2025, accessed 3 March 2025, https://www.chathamhouse.org/2023/06/nuclear-governance-model-wont-work-ai.

provided recommendations for refinement and expansion of the UN's role, though it stopped short of endorsing the UN as the sole or primary international governance body for AI. ⁷⁴ In September 2024, the UN released the *Governing AI for Humanity* report, building on the interim report. ⁷⁵ The report recommended the establishment of an AI office within the UN Secretariat, reporting to the Secretary-General, but did not explicitly endorse the creation of a new agency in the model of the IAEA.

The US position on the UN's role in AI governance is more nebulous. Although the Biden administration consistently utilized the UN as a forum to promote resolutions related to AI safety and security, the administration did not officially comment on proposals to establish a new AI agency under the auspices of the UN. The Trump administration, which has prioritized rolling back federal oversight of AI technologies, will likely be reluctant to place limits on the ability of US companies to develop and innovate in the AI sphere by empowering an international organization with AI governance responsibilities. Further, the Trump administration's early efforts to review the United States' role in the UN suggest that the administration may be less willing to utilize the UN as a forum for AI debate and policy progression, potentially limiting a channel where the US and China have historically collaborated on AI initiatives.⁷⁶

More research is needed to understand the value and limitations of the UN's involvement in international AI governance, as well as the potential scope and structure of its role. The Cooperative Monitoring Center (CMC) at Sandia National Laboratories could contribute in this area, leveraging the laboratory's technical expertise in AI and depth of understanding of the mandate of international bodies such as the IAEA to evaluate whether development of an international governance body is in the United States' national interest.

6.3. Differences in Al Governance Values and Principles

An additional potential challenge in bridging the gap between the US and China is that each country may bring to the table a different vision for AI principles. The United States has partnered with the G7 and European Union (EU) to advance AI governance measures that aim to strengthen democratic processes and prevent human rights violations, such as the Hiroshima Process and the Framework Convention on AI.⁷⁷ US national policy on AI governance under President Biden highlighted democratic values, emphasizing that AI policies must be consistent with equity and human rights.⁷⁸ In contrast, the protection of democracy and human rights is not an AI governance priority for China, which has previously utilized AI to engage in domestic surveillance, including targeting the Uyghur population in Xinjiang province. Instead, China has advanced a vision of global AI governance that prioritizes national sovereignty and respect for domestic values and policies. This fundamentally different approach to AI governance has likely impeded previous efforts to establish mutually acceptable values and standards.

This challenge may prove less relevant under the Trump administration, which has already rescinded President Biden's EO on Safe, Secure, and Trustworthy AI in favor of a new Executive Order on

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⁷⁴ United Nations Chief Executives Board for Coordination, *UN System White Paper on Artificial Intelligence Governance* (November 2024), accessed 3 March 2025, https://unsceb.org/sites/default/files/2024-11/UNSystemWhitePaperAIGovernance.pdf.

⁷⁵ AI Advisory Body, *Governing AI for Humanity* (September 2024), United Nations, accessed 3 March 2025, https://www.un.org/sites/un2.un.org/files/governing_ai_for_humanity_final_report_en.pdf.

⁷⁶ Farnaz Fassihi, "Trump Signs Executive Order Calling for Review of US Funding and Ties to U.N." *The New York Times*, 4 February 2025, accessed 3 March 2025, https://www.nytimes.com/2025/02/04/us/politics/trump-united-nations-unrwa.html.

⁷⁷ Benjamin Herscovitch, "China and the Great Global AI Governance Divide," *The Interpreter*, 27 March 2024, accessed 4 February 2025, https://www.lowyinstitute.org/the-interpreter/china-great-global-ai-governance-divide.

⁷⁸ Executive Order No. 14110, "Safe, Secure, and Trustworthy Development."

Removing Barriers to American Leadership in AI. Policies directed under the Biden EO are also currently under review to ensure their alignment with the incoming Trump administration directive. The new order lacks specific language on democracy or human rights, instead emphasizing "human flourishing, economic competitiveness, and national security," but is consistent on its face with EOs under the first Trump administration that prioritized the reduction of barriers to ensuring US global AI leadership. ⁷⁹ It remains to be seen whether the Trump administration will continue to advance AI governance measures through traditional venues such as the EU and G7, where democracy and human rights considerations are likely to prominently feature in policies and agreements, or pursue a more unilateral approach.

7. OPPORTUNITIES AND NEXT STEPS

In light of the challenges discussed above and early indicators of the Trump administration's approach to AI competition and collaboration, this paper outlines a spectrum of potential options to continue advancing US-China bilateral AI governance measures and where the CMC at Sandia National Laboratories can meaningfully contribute to these efforts. These approaches range in scope from direct bilateral collaboration, including the continuation of a formal bilateral dialogue with China on AI security and/or incorporating AI considerations into a broader leader-to-leader summit, to more informal engagement through Track 1.5 and Track 2 initiatives. Should collaboration with Chinese partners prove impractical, this paper also highlights key stakeholders in AI development beyond China that the United States could engage in an attempt to move the needle on international governance measures.

7.1. Bilateral Dialogue with China on Military Uses of Al

The United States could launch an official bilateral dialogue on AI governance with the Chinese to make additional advances in setting AI norms and standards, with US participants drawn from high-level officials in the White House, State Department, and Department of Defense. President Trump has clearly articulated a vision to advance US competitiveness in the AI industry, including ensuring that US companies are not burdened by onerous regulations. Discussion topics selected for a bilateral dialogue must keep these priorities in mind. Bilateral dialogue with the Chinese could thus focus primarily on military, rather than commercial, uses of AI.

There is ample precedent for such discussions. In 2021, China submitted a position paper on regulating the military use of AI to The Convention on Certain Conventional Weapons, signaling an early interest in AI security governance. While China originally declined to sign onto REAIM 2023, revisiting these discussions in a bilateral format may provide more flexibility and the ability to make incremental progress by negotiating specific issues rather than a sweeping agreement, as evidenced by the November agreement on AI in nuclear weapons command and control. The CMC at Sandia National Laboratories could contribute to the preparation for continued bilateral dialogue by identifying potential focal areas for discussion on military uses of AI that would be mutually acceptable for the US and China.

Recent Track 2 engagements have further laid the groundwork for formal bilateral talks on the military use of AI. For example, a formal bilateral dialogue could draw insights and inspiration from

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⁷⁹ Executive Order No. 14179, "Removing Barriers."

⁸⁰ United Nations, "Position Paper of the People's Republic of China on Regulating Military Applications of Artificial Intelligence (AI)," Convention on Certain Conventional Weapons, Sixth Review Conference (Geneva, 13 – 17 December 2021), 20 December 2021, accessed 3 March 2025, https://docs-library.unoda.org/Convention on Certain Conventional Weapons - SixthReview Conference (2021)/CCW-CONF.VI-WP.2.pdf.

the Working Group on AI Scenarios, an offshoot of The China-US Track 2 Dialogue on AI and International Security. The working group focuses on simulating typical military AI applications to develop rules for the use of AI weapons systems.⁸¹

7.2. Leader-to-Leader Summit Incorporating Al Issues

The United States could seek to incorporate AI considerations into a bilateral leader-to-leader summit. In February, President Trump indicated that he expects President Xi to visit the United States and has previously expressed interest in traveling to China within his first 100 days in office. Sa,83 Discussions during an in-person summit would likely address many of the issues covered in President Trump and President Xi's most recent phone call, including trade, TikTok, and fentanyl. A high-level summit would also present an ideal opportunity to make progress on areas of mutual interest in AI governance. Such a summit would be most effective as a venue for symbolic announcements or as a catalyst for further, more detailed, discussions. For example, President Biden and President Xi used a November 2023 summit in Woodside, California to announce plans for formal talks on AI safeguards. Sa

7.3. Track 1.5 and Track 2 Dialogues with Industry and Technical SMEs

Track 1.5 and Track 2 dialogues have played an important role in setting the stage for official engagement on AI governance. There have been at least eight Track 1.5 or Track 2 US-China dialogues hosted on AI topics since 2022, which have aided US and Chinese stakeholders in developing a common understanding of concepts and definitions and identifying priorities for official bilateral dialogue. One limitation of current Track 1.5 and Track 2 initiatives is that they primarily feature participants from foreign policy or military backgrounds. While this participant composition is ideal for consensus building and facilitating connections necessary to bring about official talks, the US-China AI dialogue could also benefit from a more robust contribution from industry and technical experts.

Incorporating private industry stakeholders into the conversation on AI governance measures would allow industry representatives to set priorities and identify challenges and opportunities based on their real-world experience. Further, permitting industry to play a leading role in bilateral dialogue could alleviate concerns about the potential for AI governance measures to stifle innovation or negatively impact US industry competitiveness. Along with the incorporation of scientists and experts from academia and research bodies, broader industry representation in dialogues will ensure the identification of technical problems and solutions.

In line with this objective, the US should utilize its national laboratories as a venue and conduit for Track 1.5 and Track 2 dialogues with a technical focus. Situated at the intersection of the public and private sectors, the national laboratories have a unique mandate to advance both scientific

 ⁸¹ Center for International Security and Strategy, "The China-US Track II Dialogue on Artificial Intelligence and International Security Interim Report," Tsinghua University, 6 April 2024, accessed 3 March 2025, https://ciss.tsinghua.edu.cn/info/CISSReports/7041.
 82 Andrea Shalal and Kanishka Singh, "Trump expects visit from Chinese President Xi without giving timeline," Reuters, 20 February 2025, accessed 3 March 2025, https://www.reuters.com/world/trump-expects-visit-chinese-president-xi-without-giving-timeline-2025-02-02.

⁸³ Bonnie Glaser, "What America Can Gain if Trump Goes to China," *The New York Times*, 16 February 2025, accessed 3 March 2025, https://www.nytimes.com/2025/02/16/opinion/trump-china-summit.html.

⁸⁴ Alex Leary et al., "Trump Told Advisers He Wants to Visit China as President," *The Wall Street Journal*, 18 January 2025, accessed 3 March 2025, https://www.wsj.com/us-news/trump-china-xi-jinping-visit-e9141794.

⁸⁵ Zeke Miller et al. "Biden and Xi hold first conversation in months in effort to establish regular talks," *Associated Press*, 2 April 2024, accessed 3 March 2025, https://www.pbs.org/newshour/politics/biden-and-xi-hold-first-conversation-in-months-in-effort-to-establish-regular-talks.

innovation and national security. The labs' connections across government, industry, and academia, along with their deep pool of subject matter expertise across AI fields, make them well suited to advance bilateral dialogue on AI governance.

Additionally, the labs benefit from a long history of working with both policymakers and scientists to strengthen international peace and security. For example, the CMC at Sandia National Laboratories has engaged in science diplomacy since 1994, including contributing to confidence and security building measures and monitoring and verification of treaties and other agreements. The CMC could leverage its history of successful science diplomacy and network of policy and technical experts to conduct outreach, identify topics for discussion, and facilitate dialogue as a neutral third party. In particular, the CMC's experience bringing together stakeholders with disparate and even competing interests, such as its work in the 1990s with US and Russian scientists on arms control and technical confidence building measures, makes it well suited for this task.⁸⁶

7.4. Bilateral Engagement with US Allies and Partners

In the event that US-China dialogue on AI is rendered impossible due to escalating competition in the industry or a significant deterioration in relations, the US could prioritize bilateral engagement with other global leaders in the sector, such as the UK or Japan.

7.4.1. The United Kingdom

The UK has historically been a reliable partner for the US on AI governance measures. In April 2024, the two countries launched a formal partnership on AI safety, including engaging in joint testing exercises and personnel exchanges.⁸⁷ The UK has also been a leader in multilateral efforts to promote AI governance, including hosting the 2023 AI Safety Summit in Bletchley Park and contributing to AI standards setting documents as part of the G7.

Unlike many traditional US partners, such as the EU, the UK has also more recently followed the United States' lead in demonstrating skepticism towards broad multilateral global governance initiatives. In February 2025, the UK and US both declined to sign the Statement on Inclusive and Sustainable AI for People and the Planet, a joint declaration resulting from the 2025 AI Action Summit in Paris. 88 As the US likely continues to move away from sweeping multilateral agreements focused on AI principles, the UK represents an ideal partner to pursue bilateral dialogue on specific AI issues of concern and/or opportunities to promote responsible AI innovation.

7.4.2. Japan

Japan represents both a regional and emerging global leader in AI, with an AI systems market projected to reach 7.3 billion USD by 2027.89 Japan and the US have already launched several bilateral initiatives in AI research and development, including joint university research partnerships

⁸⁶ National Academy of Sciences, *Science and Technology and the Nonproliferation of Weapons of Mass Destruction*, 29-30 March 1995, The White House, accessed March 26, 2025, https://clintonwhitehouse3.archives.gov/WH/EOP/OSTP/forum/html/nonproli.html.

⁸⁷ "US and UK announce formal partnership on artificial intelligence safety," *The Guardian*, 2 April 2024, accessed 6 March 2025, https://www.theguardian.com/technology/2024/apr/02/us-uk-artificial-intelligence-partnership.

⁸⁸ Dan Milmon and Eleni Courea, "US and UK refuse to sign Paris summit declaration on 'inclusive' AI," *The Guardian*, 11 February 2025, accessed 6 March 2025, https://www.theguardian.com/technology/2025/feb/11/us-uk-paris-ai-summit-artificial-intelligence-declaration.

⁸⁹ International Trade Administration, "Japan Generative Artificial Intelligence," 20 September 2024, accessed 6 March 2025, https://www.trade.gov/market-intelligence/japan-generative-artificial-intelligence.

funded by private industry stakeholders such as NVIDIA. 90 Additionally, the country has been at the forefront of establishing global AI governance measures, including hosting the foundational May 2023 G7 Hiroshima Process on Generative AI.

Several recent trends align with the prioritization of Japan as a bilateral partner for the United States in AI governance. First, as in the United States, Japan seems to be moving away from a heavy-handed approach to national AI regulation, instead emphasizing the promotion of innovation, voluntary commitments from industry, and more limited sector-specific regulations. Second, Japan and the United States share a mutual concern over both the economic and national security implications of recent Chinese advances in AI technology. For example, following the release of DeepSeek-R1, the Japanese government issued an advisory highlighting security risks associated with DeepSeek's data storage practices. This alignment in interests, along with Japan's position of growing importance in the Asia Pacific AI landscape, make Japan a compelling partner.

⁹⁰ US Mission Japan, "United States and Japan Announce Two New University-Corporate AI Partnerships Worth \$110 Million," 10 April 2024, accessed 6 March 2025, https://jp.usembassy.gov/us-japan-announce-2-university-corporate-ai-partnerships-worth-110-million/.

⁹¹ Hiroki Habuka, "New Government Policy Shows Japan Favors a Light Touch for AI Regulation," Center for Strategic and International Studies, 25 February 2025, accessed 6 March 2025, https://www.csis.org/analysis/new-government-policy-shows-japan-favors-light-touch-ai-regulation.

⁹² Habuka, "Japan Favors a Light Touch for AI Regulation."

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