



The transformation of the international legal order under multipolarity: Competing governance models of the US, China, and the EU

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Abstract. The aim of the study was to identify the legal mechanisms through which competition between the United States, China and the EU is altering the substance and institutional implementation of international law. The methodology was based on conceptual-legal, formal-legal, doctrinal-legal, comparative-legal and comparative analysis methods, applied to the study of the international legal order and models of global governance of the United States of America, China and the EU. On the basis of international legal instruments, strategic and conceptual documents of the United States of America, China and the EU, official materials and specific legislation, it has been established that, in a multipolar world, international law retains its significance as a common language of legitimacy; however, the ways in which it is interpreted, applied and institutionally reproduced are determined by competition between various centres of normative influence. Competition between these actors alters the international legal order not through a rejection of international law, but through different ways of interpreting, applying and institutionally reproducing it. The American model exacerbates the fragmentation of the legal order by extending the category of “rules” beyond formally binding international law to include sanctions, secondary restrictions, export controls and coalition mechanisms. Key trends in the transformation of the Chinese model have been identified, linked to the prioritisation of sovereignty, non-interference, development, institutional representation of non-Western states, and opposition to extraterritorial sanctions. It has been demonstrated that the European model influences the international legal order through the juridification, institutionalisation and external dissemination of digital, climate, trade and human rights standards. An analysis of the practical manifestations of these models has revealed their differing legal natures: the US employs coercive normative influence, China utilises domestic anti-sanctions mechanisms with external effects, and the EU relies on the regulatory diffusion of norms through access to the European market. The study has shown that the international legal order of the 21st century is becoming polycentric, as normative, interpretative and institutional power is being redistributed among the American, Chinese and European models of global governance. The practical significance lies in the possibility of using the results to analyse sanctions policy, digital regulation, the reform of international institutions and the legal assessment of models of global governance

Keywords: sanctions regimes; normative influence; export control; extraterritoriality; digital regulation

Introduction

The international order of the 21st century is evolving amid intensifying competition between several centres of power, which influences the ways in which international legal norms are formed, interpreted and applied. The universal legal framework of international relations retains its significance, yet its principles are

interpreted through various models of security, development, technological regulation and institutional influence. Competition between leading actors affects not only foreign policy strategies but also the ways in which the international order is legally justified. As a result, a contradiction arises between the formal preservation

Suggested Citation:

Mehmeti, R.M. (2026). The transformation of the international legal order under multipolarity: Competing governance models of the US, China, and the EU. *Philosophy, Economics and Law Review*, 6(1), 63-77. doi: 10.63341/2786-491X-2026-1-63.

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of common principles of international law and their differing substantive interpretations in the American, Chinese and European models of global governance.

In the academic literature, changes to the international order are examined through several interrelated lines of analysis. A study by M. Velliet (2025) found that US export controls have gradually shifted from a logic of non-proliferation and law enforcement to a logic of strategic competition with China. This indicates that US technology regulation is becoming not only a tool of national security, but also a means of restricting competitors' access to critical technologies. J. Angelo's (2025) work establishes that export controls can be used by the US for the purposes of non-military strategic competition, including the regulation of artificial intelligence (AI), quantum technologies and next-generation communication networks. The American model demonstrates the expansion of national legal instruments beyond the scope of traditional arms control and their incorporation into a broader regime of technological containment.

Contemporary Chinese theories of the international order, as identified by H. Xiong *et al.* (2024), do not merely reject Western approaches, but form their own understanding of the global system, based on historical experience, political pluralism, state sovereignty and the representation of non-Western actors. The authors demonstrated that the Chinese approach broadens the analysis of the international order beyond a Western-centric framework, as it views it not only as a system of rules but also as the result of the distribution of power, hierarchy and competition among different political and civilisational centres. T. Harper's (2025) study supplemented this conclusion by demonstrating that the Chinese model of development and governance shapes an alternative conception of the global order through infrastructural connectivity, development initiatives and a focus on the states of the Global South. The Chinese model is not aimed at the complete destruction of the existing order, but seeks to alter the distribution of influence within it, offering a competing means of legitimising global governance.

According to J. Miró (2023), the concept of open strategic autonomy has become a way for the EU to re-think globalisation, external dependencies and the Union's role in the context of geopolitical competition. The European model of global governance is viewed not only as normative or law-centred, but also as a model of adaptation to a multipolar environment, where international law is complemented by instruments of sustainability, strategic autonomy and regulatory protection. The work by A. Bendiek & I. Stuerzer (2023) demonstrates that the "Brussels effect" (the external diffusion of EU standards beyond its market) is based not only on the size of the EU's internal market, but also on the political capital arising from European coordination procedures and legal certainty. This allows the EU

to be viewed as a competing model of global governance that transforms the international legal order not through sanctions-based coalition pressure or sovereignist revisionism, but through the external diffusion of legal and technical standards.

In a study by B. Maksuti (2026), using the examples of Albania and North Macedonia, it was found that even with a shared orientation towards European integration, the outcomes of rapprochement with the EU may vary due to domestic political conditions, institutional stability and external factors. This demonstrates that the external projection of European standards is not automatic – its external impact depends on the ability of partner states to perceive, adapt and institutionally embed European standards. In the Western Balkans, as established by A. Semenov (2025), the EU's conditionality policy faces a decline in trust in the outcomes of European integration, the influence of geopolitical factors, and a shift from transformational reforms to a more pragmatic logic of engagement. The EU retains the ability to shape standards and conditions for convergence, yet its normative influence becomes less stable where incentives linked to European integration are perceived as insufficiently defined, and other external actors offer alternative formats for political and economic cooperation.

Existing studies reveal individual aspects of American technology and sanctions policy, the Chinese interpretation of sovereignty, and European regulatory power; however, they do not sufficiently demonstrate how these approaches relate to one another as competing legal mechanisms for altering the content of international law, the hierarchy of its principles, and the institutional forms of its implementation. The aim of this study was therefore to establish the influence of the American, Chinese and European models of global governance on the relationship between international law, sovereignty, security, development, sanctions instruments and regulatory standards. To achieve this aim, the following tasks were set: to distinguish between the "international legal order" and the "rules-based international order" as different categories of analysis of international law and politico-normative rules; to compare the American, Chinese and European models of global governance in terms of sources of legitimacy, attitudes towards sovereignty, the role of institutions and their transformative effect on the international legal order; to analyse, on the basis of practical examples, the impact of the American, Chinese and European models of global governance on the international legal order through sanctions, technological, anti-extraterritorial, digital and climate-related instruments.

Materials and Methods

The study was qualitative in nature and was based on the application of conceptual-legal, formal-legal, doctrinal-legal, comparative-legal and comparative

analysis to examine the legal transformation of the international order in the context of competition between the American, Chinese and European models of global governance. Using the method of conceptual-legal analysis, the transformation of the international legal order was interpreted on the basis of a distinction between the categories of “international legal order” and “rules-based international order”. The choice of these categories is due to the fact that they reflect the distinction between international law as a system of legally binding norms and a broader politico-normative construct encompassing alliance commitments, institutional practices, standards of conduct and strategic expectations. The works of P. Gewirtz (2024), M. Trachtenberg (2025), and L. Vinjamuri *et al.* (2025) were used as the theoretical and legal basis for distinguishing between the categories of “international legal order” and “rules-based international order”, as well as for the subsequent comparison of the American, Chinese and European models of global governance. Their analysis made it possible to identify the distinction between international law as a system of legally binding norms and a broader political-normative framework encompassing institutional practices, alliance commitments, standards of conduct and competing conceptions of international legitimacy.

A formal-legal method was employed to analyse the normative sources enshrining the basic principles of the international legal order. The Charter of the United Nations (1945), the Declaration on Principles of International Law Concerning Friendly Relations and Cooperation Among States in Accordance with the Charter of the United Nations (1970), and the Helsinki Final Act (1975) were considered as the normative basis for defining the content of the sovereign equality of states, the prohibition of the use of force, the peaceful settlement of disputes, non-interference, territorial integrity, international cooperation and respect for international obligations. An analysis of these documents enabled the formulation of a legal criterion against which the American, Chinese and European models of global governance were subsequently compared, and their impact on the transformation of the international legal order was assessed.

Using a method of doctrinal and legal analysis, this study examines the American, Chinese and European models of global governance as distinct approaches to the legal construction of the international order, thereby identifying the internal legal logic of each model. The choice of the US, China and the EU is based on the fact that they act as independent centres of normative influence in a multipolar world: the American model is associated with the expansion of the category of a rules-based international order, the Chinese model with the priority of sovereignty, non-interference and institutional revisionism, and the European model with centre-right multilateralism and the regulatory

dissemination of standards. Strategic and conceptual documents from the US, China and the EU, including the National Security Strategy of the United States (2022), the Global Security Initiative and the Global Governance Initiative (Ministry of Foreign Affairs of the People's Republic of China, 2023a; 2025) A strategic compass for security and defence (Council of the European Union, 2022), were used to identify the doctrinal approaches of the relevant actors to the international order, sovereignty, security, development, multilateralism and strategic competition. Regulatory acts, including Article 21 of the Treaty on European Union (2008), the Rules on Countering the Unlawful Extraterritorial Application of Foreign Laws and Other Measures (Order of The Ministry of Commerce of the People's Republic of China No. 1, 2021), and the Anti-Foreign Sanctions Law of the People's Republic of China (2021), were used to analyse the legal instruments for implementing these models. Analytical studies and reports, including M. Grajewski (2023), European Parliamentary Research Service (2024), and M.T. Fravel (2025) were used for a comparative interpretation of the influence of these models on the transformation of the international legal order.

Using the method of comparative legal analysis, the American, Chinese and European models of global governance were compared with the aim of identifying the differences between them. The comparison was conducted according to the following criteria: basic normative formula, source of legitimacy, main object of normative protection, main instruments of influence, attitude towards sovereignty, role of the UN, legal vulnerability, and transformative effect on the international legal order. These criteria were chosen because they allow the models to be compared not as foreign policy strategies, but as different approaches to the legal construction of the international order.

The practical manifestations of the American, Chinese and European models of global governance are compared using the method of comparative analysis. For each model, examples were selected that reflect a characteristic instrument of influence on the international legal order: for the US – sanctions pressure and export controls (Bureau of Industry and Security, 2024); for China – countering unilateral sanctions (Ministry of Foreign Affairs of the People's Republic of China (2023b) and the promotion of a security concept based on sovereignty and non-interference. For the EU – digital (European Commission, 2024) and climate regulation (European Commission, 2026). For the EU, a section of the CMS (2024) analytical report is additionally utilised, as it reflects not the creation of a new legal regime, but the practical application of existing data protection standards. The selection of these examples is based on the fact that they reflect different ways of practically influencing the international legal order: coercive normative pressure,

challenging extraterritoriality, and the regulatory extension of standards. This made it possible to correlate the theoretically identified models with their practical manifestations and to determine through which legal, economic and technological instruments they influence the international legal order. The limitations of the study stem from its theoretical and analytical nature and the lack of comprehensive coverage of the positions of other participants in the international legal order. Furthermore, the study focuses on the normative and legal dimension of the transformation of the international legal order and does not include a quantitative assessment of the effectiveness of the instruments under consideration.

Results

Competing models of global governance in the international legal order

The transformation of the international legal order in the 21st century is taking place whilst its basic normative framework remains intact. The international legal order is viewed as a system of principles, norms and institutions governing the interaction between states and other subjects of international law. It is founded on the principles of the sovereign equality of states, the prohibition of the use of force, the peaceful settlement of disputes, non-interference and international cooperation, as enshrined in the Charter of the United Nations (1945), the Declaration on Principles of International Law Concerning Friendly Relations and Cooperation Among States in Accordance with the Charter of the United Nations (1970) and the Helsinki Final Act (1975). In the classical understanding, such an order is based on a combination of state sovereignty and legal constraints arising from obligations to maintain international peace, observe international law and participate in multilateral cooperation.

In a multipolar world, differences lie not in the recognition of these principles, but in the way they are interpreted, prioritised and institutionally implemented. The US, China and the EU define the relationship between international law, sovereignty, security, development and legitimacy in different ways. Consequently, the transformation of the international legal order manifests itself through competition between models of global governance, within which various centres of normative influence shape different approaches to the substance of international obligations, permissible instruments of influence, and the role of international institutions.

A comparison of the categories “international legal order” and “rules-based international order” has revealed a distinction between legally binding norms of international law and the broader political-normative framework of global governance. The international legal order is based on legally binding norms enshrined in the Charter of the United Nations (1945),

international treaties, customary international law and general principles of law. The rules-based international order is a less well-defined category, as it may include, alongside norms of international law, political commitments, institutional practices, alliance arrangements, standards of conduct and strategic expectations (Trachtenberg, 2025). Competition over such an order therefore reflects not only a dispute over existing international law, but also a struggle to define the content of international “rules”, criteria of legitimacy, and the authority of institutions to interpret the international order (Vinjamuri *et al.*, 2025).

This distinction is particularly evident when analysing the American model of global governance. It is based on a broader understanding of the category of “rules”, extending beyond the scope of formally binding international law. In this model, legally binding norms coexist with political commitments, allied coordination, sanctions mechanisms, export controls, technological security and coalition-based regulatory frameworks. As a result, the international legal order becomes more fragmented and polycentric, as parallel regimes of normative influence, based on strategic compatibility, economic security and coalition solidarity, emerge alongside universal international legal norms (Gewirtz, 2024).

The American model of international order is based on an expanded understanding of normativity: the category of “rules-based international order” encompasses not only formally binding sources of international law, but also political, institutional, alliance-based and strategic rules. In this respect, it differs from the category of “international legal order”, as it links international legitimacy not only to law, but also to American leadership and the Western institutional architecture (Trachtenberg, 2025). From the perspective of classical international law, such an expansion of the normative framework creates tension between the universal principles of the international legal order and politically selective criteria of legitimacy. The Charter of the United Nations (1945) and the Declaration on Principles of International Law Concerning Friendly Relations and Cooperation Among States in Accordance with the Charter of the United Nations (1970) enshrine the sovereign equality of states, the prohibition of the use of force, non-interference, the peaceful settlement of disputes and cooperation among states as the foundations of the international legal order. The American model does not formally reject these principles, but supplements them with criteria of democracy, allied solidarity, open markets, technological reliability, and the containment of states regarded as revisionist. Consequently, international legitimacy is determined not only by compliance with universal international law, but also by a state’s inclusion in a broader political-normative order, shaped predominantly within Western and coalition frameworks.

The legal and political significance of this approach lies in the fact that the international order is interpreted not only as a set of universal norms, but also as an institutional and value-based configuration linked to American leadership, a system of alliances and strategic coordination. The main contradiction of the American model lies in the fact that the category of “rules” proves to be broader than that of “law”: legally binding norms coexist with political commitments, coalition standards, sanctions practices, export controls and mechanisms of strategic deterrence (Trachtenberg, 2025). This blurs the line between norms based on universal consent among states and rules that acquire practical binding force through the economic, institutional and coalition power of the US and its allies (Hopewell, 2022; Gewirtz, 2024).

In the American model, sanctions policy, export controls and trade and technology restrictions serve as instruments for implementing an expanded understanding of international “rules”. Unilateral restrictive measures, secondary sanctions and extraterritorial regulatory instruments are used as means of exerting normative pressure on states, companies and intermediaries from third countries (U.S. Department of the Treasury, 2024). Export controls and technology restrictions are used to limit the access of certain states and associated entities to sensitive US technologies (Bureau of Industry and Security, 2024). The legal issue is that measures based on US national jurisdiction acquire a transnational effect and impact entities outside US territory. In the field of international economic law, this means that trade and technology regulation are used not only to organise exchange, but also as instruments of economic coercion, strategic pressure and the formation of selective access hierarchies (Hopewell, 2022).

Consequently, the American model transforms the international legal order by extending the scope of the international order beyond formal international law and shifting rule-making to allied, coalition and national frameworks. Its key effect is that legally binding norms begin to coexist with political rules, sanctions regimes, export controls and mechanisms of strategic deterrence. This exacerbates the fragmentation of the legal order, as parallel normative regimes based on coalition solidarity, strategic compatibility and economic security emerge alongside universal norms. For US allies, including the EU, this model creates a derivative legal effect: participation in sanctions regimes, export controls and technological restrictions becomes a means of integration into the American architecture of the normative order. In a multipolar world, the American model simultaneously upholds and redefines the international legal order, transforming it into an arena of contestation over the content, source and limits of global rules.

The Chinese model of the international order represents an interpretation of international law in which

priority is given to sovereignty, non-interference, the equality of states, the peaceful settlement of disputes, and the central role of the UN. These principles are enshrined in the Charter of the United Nations (1945) and elaborated upon in the Declaration on Principles of International Law Concerning Friendly Relations and Cooperation Among States in Accordance with the Charter of the United Nations (1970). The Chinese approach does not deny this legal framework, but alters the hierarchy of its elements: sovereignty and non-interference are viewed as limits on external political pressure, unilateral sanctions, bloc discipline and the universalisation of liberal-democratic standards (Ministry of Foreign Affairs of the People’s Republic of China, 2023a; Gewirtz, 2024). The legal significance of this approach lies in the fact that China uses the language of the UN Charter not to replace international law with a different system of legitimacy, but to justify a state-centred interpretation of the international order. According to this logic, the legitimacy of international action is determined primarily by respect for sovereignty, the absence of external coercion, and the recognition of the formal equality of states. A state’s status under international law is separated from the assessment of its domestic political regime, whilst the principle of non-interference takes on a restrictive function in relation to sanctions mechanisms and politically conditioned terms of cooperation (Ministry of Foreign Affairs of the People’s Republic of China, 2023a; Fravel, 2025).

This position finds practical expression in anti-sanctions and blocking mechanisms aimed at limiting the effect of foreign restrictive measures and the extraterritorial application of other states’ national legislation. The rules on countering the unlawful extraterritorial application of foreign legislation and other measures provide for an assessment of foreign regulations in terms of their compliance with international law, their impact on China’s sovereignty, security and development interests, as well as their consequences for Chinese citizens and organisations (Order of The Ministry of Commerce of the People’s Republic of China No. 1, 2021). The Anti-Foreign Sanctions Law of the People’s Republic of China (2021) enshrines the possibility of applying countermeasures against individuals and organisations involved in the drafting, adoption or implementation of discriminatory restrictive measures against China, its citizens and organisations. Consequently, the Chinese model is implemented not only as a doctrinal appeal to sovereignty and non-interference, but also as a normative mechanism for countering foreign sanctions and the extraterritorial application of other states’ national legislation.

Development also takes on legal and political significance within the Chinese model. Reform of global governance is presented as a process of enhancing the fairness, inclusivity and representativeness of the international system (Ministry of Foreign Affairs of the

People's Republic of China, 2025). Development is viewed not only as an object of international cooperation, but also as a criterion for the legitimacy of the international order. Economic growth, infrastructure connectivity and the increased participation of non-Western states are becoming the basis for a re-evaluation of the distribution of influence within global governance institutions. The Chinese model is therefore institutionally revisionist in nature: it does not reject existing international institutions, but challenges the distribution of interpretative power within them and the parameters of legitimate global governance (Fravel, 2025). Unlike the American model, China is transforming the international legal order not by expanding the scope of coalition "rules", but by altering the hierarchy of existing principles of international law. Sovereignty, non-interference, development and institutional representativeness are put forward as the foundations of international legitimacy, whereas the Western model of a rules-based order is viewed as a mechanism for maintaining asymmetric normative influence (Gewirtz, 2024). At the same time, the Chinese model contains an internal legal contradiction: sovereignty and non-interference function not only as universal principles, but also as instruments for limiting external pressure on issues affecting security, territorial interests and regional influence. Consequently, the Chinese model transforms the international legal order not by rejecting international law, but by altering the hierarchy of its principles. The Chinese approach is revisionist but not anti-legal: it retains a commitment to the UN Charter and international law, yet challenges the Western interpretation of legitimacy, particularly regarding unilateral sanctions, extraterritorial jurisdiction, bloc politics and the universalisation of liberal-democratic standards. Its transformative effect lies in the fact that international law becomes a space of competition not only for compliance with norms, but also for determining which principles should take precedence in global governance.

The European model of the international order is characterised as a law-centred and institutional-regulatory model of global governance. In this model, the EU's external action is linked to international law, multilateral institutions, human rights, the rule of law and procedural legitimacy. Article 21 of the Treaty on European Union (2008) stipulates that the Union's external action is based on the principles of democracy, the rule of law, the universality and indivisibility of human rights, and respect for the UN Charter and international law. The legitimacy of the EU's foreign policy derives not from global leadership or anti-hegemonic revisionism, but from compliance with legal principles, institutional procedures and multilateral commitments. In contrast to the American approach, in the European model the concept of a "rules-based order" is much more closely linked to international law, the central role of the UN and effective multilateralism (European External Action Service, 2016).

The legal significance of this model lies in the fact that the international order is reproduced not only through the recognition of universal norms, but also through institutions, procedures and coordination mechanisms. The EU links the stability of the international legal order to institutional predictability and procedural decision-making, seeking to limit unilateral behaviour by states through international organisations, treaty regimes and multilateral mechanisms (European External Action Service, 2025). At the same time, the European model influences the international legal order through the dissemination of its own legal and regulatory standards. Consequently, the EU exerts external normative influence not only through support for international institutions, but also through standards, trade relations and institutional forms of cooperation (European External Action Service, 2016). This creates an internal legal tension within the European model. On the one hand, the EU reinforces the importance of international law, human rights, procedural transparency, and environmental and digital standards. On the other hand, the dissemination of norms formed within the EU legal order raises the question of the limits of their external universalisation, since access to the market, institutional proximity or deeper cooperation may depend on the adoption of standards developed within the Union itself. This mechanism can be explained by the "Brussels effect": EU norms acquire transnational significance either through their voluntary extension by companies to global operations, or through the adoption of similar standards by third countries (European Parliamentary Research Service, 2024).

In a multipolar world, the EU is adapting its rule-of-law-centred model to an environment of strategic competition. The concept of strategic autonomy reflects the Union's desire to retain the capacity to formulate foreign policy, economic and regulatory decisions independently, although this autonomy is constrained by the structural impact of US-China rivalry (Council of the European Union, 2022; Grajewski, 2023). Consequently, the European model transforms the international legal order through the juridification, institutionalisation and transnational dissemination of regulatory standards. Unlike the American model, the EU links the rules-based order more closely to international law, multilateral institutions and procedural legitimacy. Unlike the Chinese model, it does not regard sovereignty as the primary limit on external normativity, as it links international legitimacy to human rights, the rule of law, and environmental and digital standards. The transformative effect of the European model lies in the fact that the EU's regional normative system acquires global significance and becomes one of the mechanisms for regulating international relations, whilst the international legal order gains a more pronounced regulatory and institutional structure.

Legal models of global governance in the transformation of the international legal order

In a multipolar world, the transformation of the international legal order manifests itself through the

coexistence and competition of various models of global governance, which define the relationship between international law, sovereignty, security, development and legitimacy in different ways (Table 1).

Table 1. Comparative characteristics of the US, Chinese and EU models of global governance

Criterion	US	China	EU
Basic normative formula	Rule-based international order	Sovereignty, non-interference, development, reform of global governance	International law, effective multilateralism, human rights
Source of legitimacy	Leadership, alliances, democracy, security of the order	Sovereign equality, political pluralism, development, anti-hegemony	Law, institutions, human rights, procedural legitimacy
Main object of normative protection	Stability of the existing order and the alliance system	State sovereignty and equitable development	The universality of international law and institutional predictability
Main instruments of influence	Alliances, sanctions, export controls, trade and technology restrictions	Security, development and global governance reform initiatives	Treaties, standards, conditionality policies, trade and digital regulation
Relationship to sovereignty	Recognised, but balanced against security and political compatibility	Regarded as a primary norm and a limit on external interference	Limited by international obligations, human rights and supranational coordination
Role of the UN	Support whilst maintaining scope for unilateral and coalition action	Support for the UN as a universal and anti-hegemonic platform	Support for the central role of the UN and multilateral institutions
The main legal vulnerability	Selective application of rules, extraterritoriality, blurring of the line between law and “rules”	Selective use of sovereignty and the limited scope of the human rights dimension	Limited strategic autonomy and dependence in the security sphere
Transformative effect on the international legal order	Extends the scope of “rules” beyond formal international law	Shifts the hierarchy of principles in favour of sovereignty, non-interference and development	Transforms the legal order through the regulatory dissemination of norms, standards and procedures

Source: compiled by the author based on Treaty on European Union (2008), National Security Strategy of the United States (2022), Council of the European Union (2022), K. Hopewell (2022), M. Grajewski (2023), Ministry of Foreign Affairs of the People’s Republic of China (2023a; 2025), European External Action Service (2016; 2025), M.T. Fravel (2025), L. Vinjamuri *et al.* (2025), M. Trachtenberg (2025)

A comparison of the three models has shown that their differences concern not only foreign policy objectives, but above all the methods of legal construction of the international order. The American model exacerbates the fragmentation of the international legal order to the greatest extent, as it extends the scope of political and normative “rules” beyond the bounds of formally binding international law and relies on coalition-based, sanctions-based and extraterritorial mechanisms. The Chinese model proposes institutional revisionism; it does not reject international law or the central role of the UN, but seeks to alter the hierarchy of its principles in favour of sovereignty, non-interference, development and broader representation of non-Western states. The

European model largely retains a universalist commitment to international law, multilateral institutions and procedural legitimacy, yet simultaneously reinforces regulatory fragmentation through the external dissemination of its own standards. Consequently, the transformation of the international legal order under multipolarity is expressed not in its destruction, but in the redistribution of normative power among various centres of power, which define the content of legitimacy, permissible regulatory mechanisms and the priority principles of global governance in different ways. It is also worth examining the practical manifestations of the American, Chinese and European models of global governance in contemporary international relations (Table 2).

Table 2. Comparative characteristics of the empirical manifestations of competing models of global governance

Actor, period	Practical manifestation of the global governance model	Instrument of influence	Significance for the transformation of the international legal order
USA, 2024	Sanctions pressure on companies and intermediaries from third countries involved in circumventing restrictions against Russia	Sanctions, secondary restrictions, transnational pressure	The external effects of US national sanctions and their use as an instrument of normative pressure

Table 2. Continued

Actor, period	Practical manifestation of the global governance model	Instrument of influence	Significance for the transformation of the international legal order
USA, 2024	Restricting access by Russia, China, Iran and associated entities to sensitive US technologies	Export controls, Entity List, technology restrictions	Use of technology regulation as a security tool and to restrict competitors' access to sensitive technologies
China, 2023	Countering unilateral sanctions and the extraterritorial jurisdiction of foreign states	Anti-sanctions stance, criticism of extraterritorial jurisdiction, appeal to sovereignty and non-interference	Limiting the extraterritorial effect of national sanctions regimes by invoking sovereignty, non-interference and international law
	Formulation of an alternative security concept based on sovereignty, non-interference, dialogue and rejection of bloc logic	Sovereignty, non-interference, common security, dialogue	Presents an alternative security model opposed to bloc logic, unilateral sanctions and external political pressure
EU, 2024, full implementation – 2026	Creation and phased introduction of a unified risk-based legal framework for AI regulation	Digital regulation, risk-based approach, AI standards	The EU's ability to set digital standards with potential external effects
EU, 2023-2026	Phased introduction of a carbon border adjustment mechanism linking the access of carbon-intensive goods to the EU market to their production emissions	Climate regulation, carbon requirements for imports	External dissemination of EU environmental standards through trade regulation

Note: the examples provided do not constitute an exhaustive description of the foreign policy practices of the US, China and the EU, but are used as analytical illustrations of the legal mechanisms for transforming the international legal order

Source: compiled by the author based on Ministry of Foreign Affairs of the People's Republic of China (2023a; 2023b), U.S. Department of the Treasury (2024), Bureau of Industry and Security (2024), European Commission (2024; 2026)

The legal risks of the American model lie primarily in the fact that secondary sanctions and extraterritorial export controls create a situation of competing jurisdictional requirements. Entities in third countries, which are not formally subject to US domestic law, find themselves compelled to take US restrictions into account due to the risk of losing access to the US financial system, market, technologies or supply chains. This gives rise to legal uncertainty, reinforces private-sector compliance with sanctions regimes and blurs the distinction between a state's domestic jurisdiction and international legal regulation. As a result, US national measures acquire an external normative effect without universal international consensus and without mandatory institutional enshrinement within the UN framework.

The Chinese model operates differently: the PRC's anti-sanctions legislation establishes a domestic legal mechanism to counter foreign restrictive measures, yet simultaneously has an external normative effect. The rules on countering the unlawful extraterritorial application of foreign legislation and the PRC Law on Countering Foreign Sanctions translate the doctrinal appeal to sovereignty and non-interference into a system of legal prohibitions, countermeasures and legal consequences for persons involved in the implementation of foreign sanctions. In doing so, China uses domestic law as a tool to protect against external sanctions pressure and, at the same time, as a means of challenging the legitimacy of other states' extraterritorial measures.

The European model disseminates its own standards through a different legal mechanism – conditional access to the EU internal market. The EU's digital, climate, trade and human rights requirements acquire external significance when third states, foreign companies or transnational supply chains are forced to adapt to European rules in order to retain access to the Union's market. In this case, EU norms are not imposed as universal international law, but effectively become transnational standards of conduct through market conditionality, regulatory compatibility and the enforcement practices of European institutions.

CMS (2024) deserves special mention, as this source reflects not the creation of a new legal regime, but the practice of applying the existing EU General Data Protection Regulation. It records the consistent enforcement activities of European regulators in relation to companies, including major technology platforms. This confirms that European data protection standards function not only as a normative model but also as a mechanism of regulation that is actually applied. Consequently, these empirical manifestations reveal three distinct mechanisms of transformation of the international legal order. The US influences it through coercive sanctions and technological restrictions; China through challenging extraterritoriality, defending sovereignty and promoting an alternative concept of security; and the EU through the regulatory expansion of digital, environmental and human rights standards. Their overall

analytical value lies in the fact that they demonstrate the practical manifestation of multipolarity: the international legal order is changing not in the abstract, but through the specific legal, economic and technological instruments of various centres of power.

The transformation of the international legal order in a multipolar world is manifested not in the disappearance of international law, but in changes to the ways in which it is interpreted, applied and institutionally reproduced. The 21st-century system is becoming more polycentric, fragmented and competitive. International law retains its significance as a common language of legitimacy; however, different centres of power are increasingly defining the content of legitimacy, the hierarchy of principles, the limits of sovereignty and the permissible instruments of normative influence in different ways. The US, China and the EU demonstrate three different models of such a transformation. The American model transforms the international legal order by extending the category of “rules” beyond formally binding international law, relying on coalition frameworks, sanctions pressure, export controls and technological containment. The Chinese model transforms the international legal order by reordering its principles: sovereignty, non-interference, development, political pluralism and broader representation of non-Western states in global governance institutions are brought to the fore. The European model transforms the international legal order through the legalisation, institutionalisation and external dissemination of regulatory standards, including digital, climate, trade and human rights regulation.

Empirical examples confirm that this is not merely a matter of foreign policy competition, but also of the legal transformation of the international order. US sanctions, secondary restrictions and export controls demonstrate how national legal instruments acquire a transnational effect and begin to function as a means of international normative pressure. China’s criticism of extraterritorial jurisdiction and unilateral sanctions demonstrates a desire to limit the extraterritorial effect of national sanctions regimes by invoking the principles of sovereignty, non-interference and the central role of the UN. European instruments reveal a different mechanism of transformation: norms formed within the EU legal order acquire external significance through access to the European market and become part of the global regulatory space.

The competition between these models affects not only the rhetoric of international law, but also the institutional reproduction of the international legal order. For the US, the UN retains its significance as a universal framework of legitimacy; however, practical regulation is increasingly shifting to coalition, sanctions and technological regimes operating in parallel with universal institutions. China, by contrast, invokes the central role of the UN as the basis for criticising unilateral

sanctions, bloc logic and extraterritorial jurisdiction, but at the same time seeks to alter the distribution of influence within existing institutions of global governance. The EU supports the UN and multilateral institutions as the basis for procedural legitimacy, yet supplements universal international legal mechanisms by extending its own regulatory standards externally. Therefore, the institutional transformation of the international legal order is expressed not in a rejection of the UN, but in competition over which institutions, procedures and legal regimes will determine the substance of international legitimacy in a multipolar world.

Consequently, the international legal order of the 21st century is becoming not post-legal, but polycentric. Its stability depends not on a return to a unipolar model, nor on the replacement of universal institutions with competing blocs, but on the ability to preserve a common international legal framework whilst simultaneously adapting global governance institutions to a more pluralistic and multipolar international system. Multipolarity redistributes normative and interpretative power among various centres of power, transforming the international legal order into a space of competition between the American coalition-sanctions model of a rules-based order, the Chinese model of sovereign institutional revisionism, and the European model of centre-right regulatory multilateralism.

Discussion

The findings of the study have shown that the transformation of the international legal order does not signify the disappearance of international law, but is expressed in a change in the ways in which it is interpreted, applied and institutionally reproduced. This conclusion is consistent with the position of R. Vos *et al.* (2021), who viewed the international legal order as a system that remains significant for maintaining international peace and security, but which is under pressure amid shifts in the global balance of power, growing challenges to existing norms, and the strengthening role of non-Western states. Similarly, in the work of D.L. Sloss (2022), the analysis focuses not on the uncompleted collapse of the international order, but on the aggregate of threats to the rules-based international order; it is emphasised that this order faces challenges but is not yet in a state of complete collapse. The findings of this study confirm the thesis regarding the crisis in the international legal order, whilst simultaneously clarifying its nature, demonstrating that this crisis manifests itself not only in the weakening of universal norms or international institutions, but primarily in the redistribution of normative and interpretative authority amongst several centres of power. In contrast to approaches by authors who emphasise the general pressure on the international legal order, this study considers multipolarity as a legal reconfiguration of the international legal order, manifested in the competition between American,

Chinese and European models of global governance. This conclusion also aligns with the study by K.M. Osland & M. Peter (2021), who, using the example of UN peace-keeping operations, demonstrated that in a multipolar environment, international institutions are compelled to adapt to a more complex environment by prioritising the rule of law and “bottom-up” approaches. The work by T. Wijaya & K. Jayasuriya (2024) analyses the formation of a new multipolar order through combined development, changes in state forms, the emergence of new business classes and competing regulatory spaces. This study expands on this line of thought: multipolarity has not only institutional or political-economic significance, but also international legal significance, as it alters who determines the content of international legitimacy, the limits of sovereignty, the permissibility of economic coercion, and the forms of global governance, and how this is done.

In K. Hopewell's (2021) study, the crisis of the liberal trading order is linked to a shift in the US's role within the international trading system. The author demonstrates that the US has moved away from its former role as a multilateral leader and has employed unilateral trade measures that have complicated the functioning of World Trade Organisation mechanisms, including the trade dispute settlement system. This study finds that the American model has a broader transformative effect – it operates not only through trade measures, but also through sanctions, export controls, coalition frameworks, and trade and technology restrictions. This study therefore builds on the conclusion of K. Hopewell, viewing the crisis of the liberal trade order as part of a broader transformation of the international legal order, within which economic and technological instruments acquire normative significance and influence the conditions of participation of states and companies in the international order.

J. Schmidt's (2022) work analyses the legality of unilateral extraterritorial sanctions as a distinct issue of international law, linked to the limits of jurisdiction, sanctions regulation and the principle of non-interference. The findings of this study align with this position, as the American model is also examined through the transnational effect of US national legal instruments and their impact on third states, companies and intermediaries. At the same time, this study expands upon J. Schmidt's approach: extraterritoriality is viewed not only as a question of the legality of individual sanction measures, but also as a mechanism for transforming the international legal order, through which the American model turns national legal regimes into instruments of international normative pressure. H.G. Cohen's (2024) study found that states resort to measures at the intersection of trade and security, including sanctions, tariffs, export controls, foreign investment screening and subsidies, whilst the rules governing their application remain insufficiently defined. V.K. Aggarwal &

A.W. Reddie (2024) examined a new economic state strategy as the use of trade and investment instruments for foreign policy objectives, which places pressure on international economic institutions. The work by G. Felbermayr *et al.* (2021) systematises interdisciplinary approaches to the analysis of economic sanctions, their causes, consequences and effectiveness. The authors' conclusions correspond with the findings of this study, as sanctions, export controls and trade and technology restrictions were examined as interrelated instruments of the American model. However, this study offers a different level of generalisation: such measures are analysed not only as instruments of economic policy or security, but also as elements of the American model for transforming the international legal order, reinforcing the blurring of the boundary between law, security and economic coercion.

The findings of the study revealed that the Chinese model does not reject the international legal order, but rather redefines the hierarchy of its principles in favour of sovereignty, non-interference, development and institutional representation of non-Western states. This is comparable to the work of S. Seppänen & E. Smith (2025), which analysed the new Chinese doctrine of non-interference. The authors demonstrated that the Chinese approach to non-interference is not limited to the classical understanding of this principle, but takes on a more contextual character, depending on the subject, form and purpose of the interference. This helps to clarify the findings of the present study: non-interference in the Chinese model functions not only as a principle of the UN Charter, but also as a legal argument against external political pressure and interference in a state's internal affairs. In the work of J. deLisle (2024), this conclusion is supplemented through an analysis of sovereignty as a consistent category in the Chinese approach to international law. Sovereignty occupies a central place in Chinese international legal argumentation, although its content and significance have varied across different periods and subject areas. This corresponds with the findings of the present study, as the Chinese model has been identified as sovereignist but not anti-legal – it does not replace international law with a completely alternative system, but utilises existing principles of international law, primarily sovereign equality and non-interference, to challenge Western interpretations of legitimacy.

In the study by M.S. Erie (2023), China's outward-oriented legal regulation is examined as a reform aimed at modernising the intersection of Chinese domestic law, foreign policy and international law; however, it is noted that it remains more of a politico-legal discourse than a fully defined policy. Z.J. Wang & J. Chen (2025) have traced the evolution of this concept, its transformation into an element of national strategy, and its role in international affairs amidst geopolitical competition. These works refine the findings

of the present study: the Chinese model encompasses not only the protection of sovereignty and non-interference, but also the development of outward-looking legal instruments through which China operates in a context of global competition. At the same time, a comparison of these approaches reveals that the degree of institutionalisation of the Chinese model is assessed differently in the literature: M.S. Erie presents it primarily as a political-legal discourse, whereas Z.J. Wang & J. Chen view it as an element of an emerging state strategy. Therefore, in this study, the Chinese model is considered not merely as a foreign policy stance, but as a means of legally constructing the international order, combining doctrinal arguments, anti-sanction mechanisms and strategic positioning.

K.J. Alter's (2025) study examines export controls from a historical and contemporary perspective within the context of US-China relations in the 21st century. The author found that US restrictions on advanced semiconductors and related technologies reflect the extension of export controls to areas where the direct military application of the technologies is not always obvious; however, control over such technologies is viewed as part of US policy towards China. This conclusion clarifies the technological dimension of the American model identified in this study: whilst the author analyses export controls primarily in the context of US-China relations, this study considers them as one of the tools of a broader transformation of the international legal order. At the same time, the impact of export controls is not unambiguous. In a study by Y. Peng (2025), based on US sanctions against the Chinese semiconductor industry, it is demonstrated that external pressure may not only restrict China's access to technology but also stimulate the development of its own domestic semiconductor industry. This helps to clarify the findings of the present study: export controls serve as an instrument of normative and strategic regulation, yet their impact is not limited to directly restricting a competitor's technological development. D. Woods (2025), having analysed China's response to the tightening of US technological controls, demonstrates that a further escalation of such measures could lead to a departure from a unified global technological network and the formation of a more polarised structure of the US and Chinese technological spheres. Consequently, export controls in the American model can simultaneously serve as an instrument of normative pressure and a factor in technological fragmentation and regulatory tensions.

In the work by A. Bradford (2023), global competition between the US, China and the EU in the regulation of the digital economy is examined through the concept of "digital empires". The EU is presented as a rights-oriented regulatory model, that is, as an actor exerting influence primarily through legal standards, regulation and market access, rather than through military or sanctioning power. This approach allows the findings

of A. Bradford to be correlated with the results of the present study: the European model has also been characterised as rights-centred and institutional-regulatory. At the same time, this study broadens this focus, as it examines the European model not only in the sphere of digital regulation, but also as part of a broader transformation of the international legal order, encompassing climate, trade and human rights regulation.

A study by A. Steinbach (2023) analyses the EU's shift towards strategic autonomy in the context of geopolitical rivalry, supply chain vulnerabilities and technological change. The author demonstrates that strategic autonomy expands the scope for the EU to act independently, but simultaneously creates points of tension with EU law and international law. This conclusion is comparable to the findings of the present study, in which the European model was presented as dual: on the one hand, the EU maintains its commitment to international law, multilateralism and procedural legitimacy; on the other hand, it adapts its law-centred model to the conditions of strategic competition. Therefore, this study views strategic autonomy not as the EU's rejection of legal logic, but as a means of adapting it to a more competitive international environment. B. Crum (2025) examined the EU AI Act by comparing the "Brussels effect" with experimental governance. The author demonstrated that the external effect of the EU AI Act can be explained not as the automatic spread of a European standard, but as a more open and experimental process of interaction between different regulatory approaches. M. Almada & A. Radu (2024), in turn, demonstrated that the spread of the EU AI Act as a global standard may have unintended consequences and even limit the global reach of EU policy in the field of artificial intelligence. These works refine the findings of the present study: the European model does indeed transform the international legal order through the external diffusion of standards, yet this process is neither automatic, homogeneous, nor fully controlled by the EU itself. This is where the present study differs from a simplistic understanding of the "Brussels effect": European norms are viewed not only as an instrument of global influence, but also as a source of regulatory tensions in a multipolar world.

In this study, linking market access for carbon-intensive goods to the EU market to account for carbon emissions during their production was examined as an example of the external diffusion of EU environmental standards through trade regulation. This finding is comparable to the work of L. Durel (2024), in which border carbon adjustment is analysed through the lens of its compatibility with World Trade Organisation rules. The significance of such instruments extends beyond the trade and economic sphere, as they affect perceptions of permissible forms of climate regulation in international economic law. The work of S. Otto (2025), in turn, refined this conclusion: the political reactions

of third countries to the EU's carbon border adjustment mechanism show that the external impact of European environmental standards is not an automatic or unilateral process. In contrast to the findings of this study, which emphasises the external diffusion of EU standards through trade regulation, the works of these authors highlight the reciprocal aspect of this process – adaptation, resistance and reinterpretation by other participants in the international order. Therefore, the European model transforms the international legal order through regulatory standards; however, such transformation depends not only on EU norms, but also on their perception, contestation and practical application outside the Union. Consequently, multipolarity does not abolish international law, but alters the conditions for its interpretation and application. The international legal order retains its significance as a common normative framework, but operates in a context of competition between the American, Chinese and European models of global governance.

Conclusions

The study has established that the international legal order of the 21st century is developing amidst a complex balance of power and intensifying normative competition. Its normative foundation is linked to international law, the UN Charter, and the principles of sovereign equality, non-interference, peaceful settlement of disputes, and international cooperation. However, the ways in which these principles are understood vary across different centres of power. Multipolarity does not eliminate international law from the system of international relations, but alters the conditions under which it operates. International law continues to function as a universal legal language, but no longer has a single centre of interpretation. In these circumstances, competing models of global governance become a means of shaping different conceptions of international legitimacy. Distinguishing between the categories of “international legal order” and “rules-based international order” is necessary for assessing the transformation of the legal order. The international legal order is primarily associated with legally binding norms, whereas a rules-based order also encompasses political, institutional and strategic rules. The American model demonstrates the expansion of the scope of international “rules” beyond the classical sources of international law. This model utilises alliance

mechanisms, sanctions policy, export controls and technological restrictions. As a result, US national and coalition instruments acquire a transnational normative effect. The Chinese model is built on an emphasis on sovereignty, non-interference, the equality of states and the central role of the UN. It does not reject international law, but shifts the emphasis within its principles. Within the Chinese approach, development, institutional representativeness and criticism of extraterritorial sanction mechanisms are incorporated into the argument for reforming the international legal order.

The European model is based on the rule of law, multilateral institutions, human rights and procedural legitimacy. The EU influences the international legal order by extending its own regulatory standards in the digital, climate, trade and human rights spheres. A comparison of the three models shows that the transformation of the international legal order occurs through different mechanisms: sanctions-based and coalition-driven influence, a sovereignist reinterpretation of principles, and the regulatory dissemination of standards. Competing models of global governance manifest themselves not only at the level of doctrinal approaches, but also through specific legal, economic and technological instruments used by the US, China and the EU to influence the international legal order. Consequently, the sustainability of the international legal order in the 21st century depends on whether universal principles of international law can retain their regulatory significance in a context where the US, China and the EU interpret their content, priorities and methods of application differently. Future research would be well advised to focus on the conditions under which competing models of global governance remain compatible within a single international legal order. A separate strand of such analysis could address the question of international legal mechanisms capable of curbing fragmentation and maintaining a common normative framework in a multipolar world.

Acknowledgements

None.

Funding

None.

Conflict of Interest

None.

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Трансформація міжнародного правового порядку в умовах багатополарності: конкуруючі моделі управління США, Китаю та ЄС

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Анотація. Метою дослідження було виявлення правових механізмів, за допомогою яких конкуренція між США, Китаєм та ЄС змінює зміст та інституційне втілення міжнародного права. Методологія базувалася на концептуально-правових, формально-правових, доктринально-правових, порівняльно-правових та порівняльних методах аналізу, застосованих до вивчення міжнародного правового порядку та моделей глобального управління США, Китаю та ЄС. На основі міжнародно-правових документів, стратегічних та концептуальних документів США, Китаю та ЄС, офіційних матеріалів та конкретного законодавства встановлено, що в багатополарному світі міжнародне право зберігає своє значення як спільна мова легітимності; однак способи його тлумачення, застосування та інституційного відтворення визначаються конкуренцією між різними центрами нормативного впливу. Конкуренція між цими суб'єктами змінює міжнародний правовий порядок не шляхом відмови від міжнародного права, а через різні способи його тлумачення, застосування та інституційного відтворення. Американська модель посилює фрагментацію правового порядку, розширюючи категорію «правил» за межі формально обов'язкового міжнародного права, включаючи до неї санкції, вторинні обмеження, експортний контроль та механізми коаліцій. Визначено ключові тенденції трансформації китайської моделі, пов'язані з пріоритетом суверенітету, невтручанням, розвитком, інституційним представництвом не західних держав та протидією екстериторіальним санкціям. Доведено, що європейська модель впливає на міжнародний правовий порядок через юридизацію, інституціоналізацію та зовнішнє поширення стандартів у сферах цифрових технологій, клімату, торгівлі та прав людини. Аналіз практичних проявів цих моделей виявив їхню різну правову природу: США застосовують примусовий нормативний вплив, Китай використовує внутрішні антисанкційні механізми із зовнішніми ефектами, а ЄС покладається на регуляторне поширення норм через доступ до європейського ринку. Дослідження показало, що міжнародний правовий порядок 21 століття стає поліцентричним, оскільки нормативна, інтерпретаційна та інституційна влада перерозподіляється між американською, китайською та європейською моделями глобального врядування. Практичне значення полягає в можливості використання отриманих результатів для аналізу санкційної політики, регулювання цифрової сфери, реформування міжнародних інституцій та правової оцінки моделей глобального врядування

Ключові слова: санкційні режими; нормативний вплив; експортний контроль; екстериторіальність; регулювання цифрової сфери