

**REFRAMING THE SOUTH CHINA SEA DISPUTE:
CHINA'S EMBASSY DISCOURSE IN SOUTHEAST ASIA**

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SUMMARY

This policy paper analyses the narrative regarding the South China Sea dispute created by People's Republic of China's embassies in the claimant states in Southeast Asia: Indonesia, Vietnam, the Philippines, Malaysia, and Brunei. As revealed by the key findings, the relevant discourse is dominated by references to the UN (35.2%) and USA (34.5%) with legal-technical terms (arbitrage, UNCLOS, Code of Conduct) playing a marginal role. Among the claimant states, the countries where South China Sea discourse remains the most relevant are Indonesia, Vietnam, and the Philippines. The overall pattern among all three of them is China's consistent de-emphasizing of the 2016 arbitration ruling, consultational framing of Code of Conduct and ASEAN, and the portraying of the USA as an external destabilizer.

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KEY FINDINGS

1. **The embassies narratives are structured by international legitimacy and major-power rivalry.** References to the UN (35.2%) and the USA (34.5%) together account for almost 70% of the relative discourse, compared with 22.61% for the South China Sea itself and much smaller shares for arbitration, UNCLOS, and the Code of Conduct.
2. **China combines a stable core narrative** – sovereignty and historical entitlement, selective use of international law, preference for bilateral and ASEAN-based management, and delegitimation of external intervention, with substantial adaptation to the host-country context.
3. **The 2016 arbitration award is systematically de-centred.** Even in the Philippines, where the award is politically central, arbitration has only a weak co-occurrence with the South China Sea. Legal framing is redirected toward UNCLOS and, above all, toward the Code of Conduct as a negotiated regional framework.
4. **The United States is framed as the principal external source of instability.** Embassies discourse attributes escalation to U.S. military activity, freedom-of-navigation operations, selective legal argumentation, and broader geopolitical competition, thereby shifting causal responsibility for regional tension away from China.
5. **Embassy-level variation is systematic.** Indonesia is framed primarily through regional management and consultation; the Philippines displays the most politicised and multi-layered combination of sovereignty, law, security, and external-interference arguments; Vietnam uses a more controlled legal-regional vocabulary centred on UNCLOS, dialogue, ASEAN mechanisms, and opposition to outside intervention.

INTRODUCTION

This policy paper examines how the People's Republic of China's embassies in Indonesia, Vietnam, the Philippines, Malaysia, and Brunei construct and localize narratives about the South China Sea. Rather than treating embassy communication as a simple reproduction of a single central message, the analysis approaches embassies as audience-specific sites in which common Chinese foreign-policy claims are selected, emphasized, and recombined in response to different national settings.

The central research question asks how Chinese embassies frame the South China Sea through references to the United Nations, the United States, arbitration, the United Nations Convention on the Law of the Sea (UNCLOS), and the Code of Conduct. The existing sub-questions are integrated into this broader inquiry by examining, first, how frequently these terms appear; second, whether the dispute is framed primarily as a legal question, a geopolitical contest, or a problem of international legitimacy; third, whether the UN functions as a source of legitimacy, a multilateral platform, or an arena for contesting Western influence; and fourth, how the United States is represented in relation to regional order and dispute management. A further comparative question concerns the extent to which these frames vary among embassy posts.

The analysis is designed to distinguish between legal vocabulary and the broader political function performed by that vocabulary. If embassy discourse were primarily legalistic, UNCLOS and arbitration would be expected to organize the narrative. If it were primarily geopolitical and legitimacy-oriented, references to the UN, the United States, sovereignty, external interference, and preferred regional procedures would be more prominent. The findings support the latter interpretation: legal concepts are present, but they are embedded within a wider effort to define legitimate actors, legitimate procedures, and the acceptable institutional boundaries of South China Sea dispute management.

The study therefore combines a five-country quantitative comparison with a more focused qualitative reconstruction of the embassy narratives for Indonesia, the Philippines, and Vietnam, where the current corpus provides the most detailed textual material. Malaysia and Brunei remain important to the cross-national frequency analysis,

but the absence of equivalent source excerpts in the present draft means that their argumentative strategies should be interpreted more cautiously at the qualitative level¹.

METHODOLOGY

In order to discuss the way Chinese embassies framed the question of South China Sea in the claimant states: Indonesia, Vietnam, the Philippines, Malaysia, and Brunei we use the quantitative and qualitative analysis with MAXQDA through a keyword-based content analysis of the collected 3466 documents from the Chinese embassies webpage from the relevant countries. First, the corpus was imported into MAXQDA and prepared for systematic coding. The analysis focused on six key terms: UN, USA, South China Sea, arbitration, UNCLOS, and Code of Conduct. These terms were selected because they represent the main analytical dimensions of the study: international institutions, major-power rivalry, territorial dispute, and legal-normative frameworks. After defining the keyword list, MAXQDA was used to identify and count the occurrence of each term across the dataset. The software then allowed the frequencies to be transformed into percentages, showing the relative weight of each concept within the whole corpus.

MAXQDA made it possible to move from qualitative reading to a more systematic measurement of discourse patterns. The keyword-frequency procedure helped identify which concepts structure the documents most strongly and which remain secondary. However, this stage should be treated as an initial quantitative mapping rather than a full interpretation. The next step should involve KWIC analysis, or keyword-in-context analysis, in order to examine how the terms are used. For example, references to the UN may show whether the organisation is framed as a source of legitimacy, a neutral forum, or an arena of geopolitical contestation. Similarly, references to the USA may indicate whether it is presented as a stabilising actor, a rival power, or an external interference. The terms UNCLOS, arbitration, and Code of Conduct should be examined in context to assess whether legal norms are invoked consistently or selectively. Therefore, MAXQDA

¹ AI-assisted language editing: a large language model (LLM)-based AI chatbot was used solely for language correction, proofreading, and improvement of English expression. The conceptual framework, research design, data analysis, interpretation of findings, argumentation, and conclusions were developed by the authors.

provides both a statistical overview and a basis for deeper qualitative interpretation of the corpus.

QUANTITATIVE APPROACH AND DISCUSSION

At the cross-national level, references to the United Nations (UN) are the most prevalent, accounting for 35.24% of all coded segments, closely followed by mentions of the USA (34.45%). Together, these two terms make up nearly 70% of the total related discourse. References to the South China Sea itself appear considerably less frequently (22.61%), while more technical or legal terms: Arbitrage (4.68%), UNCLOS (1.75%), and Code of Conduct (1.27%), are comparatively marginal (see Table 1).

TABLE 1. GENERAL QUANTITATIVE ANALYSIS

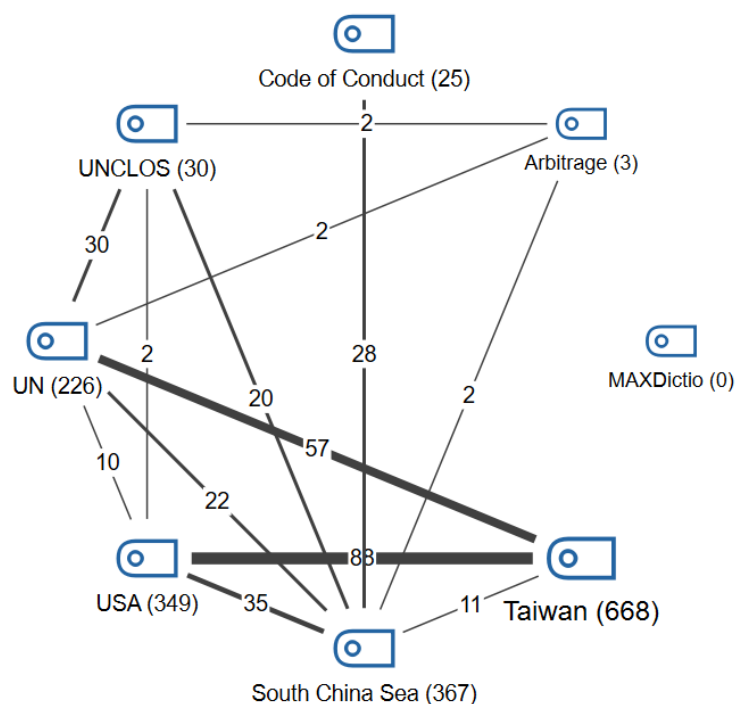
TERM	FREQUENCY OF USE	PERCENTAGE
UN	1024	35,24
USA	1001	34,45
SOUTH CHINA SEA	657	22,61
ARBITRAGE	136	4,68
UNCLOS	51	1,75
CODE OF CONDUCT	37	1,27
TOTAL	2906	100,00

Source: data analyzed in MAXQDA.

The co-occurrence map suggests that Chinese embassies in the claimant states documents construct the South China Sea and Taiwan (extra added variable) as connected elements of a wider diplomatic narrative. The discourse is organised around three main axes: first, sovereignty, represented especially by Taiwan and the South China Sea; second, geopolitical rivalry, represented by the strong links with the USA; and third, international legitimacy, represented by the UN, UNCLOS, and the Code of Conduct. The network therefore indicates that Chinese embassies use legal and multilateral language,

but the dominant structure of the discourse remains geopolitical. The South China Sea is not presented only as a maritime legal dispute, and Taiwan is not presented only as a domestic sovereignty issue. Both are embedded in a broader narrative about US interference, China's international legitimacy, and the defence of China's preferred interpretation of regional order (see Graph 1).

GRAPH 1. GENERAL NARRATIVE ELEMENTS CO-OCCURRENCE MAP



Source: data analyzed in MAXQDA.

The yearly breakdown for Indonesia reveals substantial fluctuation in discourse intensity rather than a steady linear trend. The most striking feature is the sharp spike in 2022, when USA references surge to 255 mentions, by far the highest figure in the entire decade-long dataset for this country, accompanied by an unusually high concentration of UNCLOS references (22) and the peak year for South China Sea mentions (79). This suggests that 2022 marked a critical juncture in bilateral or regional tensions, as reflected in embassy communications. UN references peak somewhat earlier, in 2019 (71) and again in 2022 (69), while remaining comparatively low in the most recent years (2024–2026). Legal-procedural terms (Code of Conduct, UNCLOS, Arbitration) remain marginal throughout, with occasional small spikes (e.g. UNCLOS in 2022) rather than sustained

presence. Overall, the data point to an escalation of discourse intensity in 2022, followed by a gradual decline through 2023–2026 (see Table 2).

TABLE 2. INDONESIA: FREQUENCY OF TERMS THROUGHOUT THE YEARS

	2026	2025	2024	2023	2022	2021	2020	2019	2018	2017
UN	9	46	26	39	69	19	42	71	5	0
SOUTH CHINA SEA	13	0	5	8	79	8	36	2	5	2
CODE OF CONDUCT	4	0	0	3	8	2	2	1	2	0
UNCLOS	0	0	0	2	22	0	4	0	0	0
ARBITRAGE	1	0	0	0	1	0	3	0	0	0
USA	8	44	22	18	255	35	45	118	18	2

Source: data analyzed in MAXQDA

Brunei's longitudinal data show a discourse profile dominated by early years rather than recent ones. The year 2014 stands out dramatically: South China Sea references reach 110 mentions and Arbitrage reaches 115 mentions, both the highest values recorded for any term, in any year, across the entire Brunei dataset, followed by a marked decline in subsequent years. The year 2015 also shows elevated South China Sea (33) and Arbitrage (7) references, reinforcing the impression that 2014–2015 represented a period of intense legal and territorial discourse, plausibly linked to the period surrounding the Philippines v. China arbitration case. From 2016 onward, these terms nearly disappear from the discourse, while UN references become comparatively more stable and persistent, fluctuating between roughly 2 and 30 mentions per year without a clear directional trend. USA references remain consistently low throughout, never exceeding 22 mentions in a single year (see Table 3).

TABLE 3. BRUNEI: FREQUENCY OF TERMS THROUGHOUT THE YEARS

	2026	2025	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015	2014
UN	2	28	13	4	24	24	22	9	2	0	3	13	30
SOUTH CHINA SEA	0	2	0	0	0	1	7	0	0	0	3	33	110
CODE OF CONDUCT	0	0	0	0	0	2	2	0	0	0	0	2	10
UNCLOS	0	0	0	0	0	0	2	0	0	0	2	3	14
ARBITRAGE	1	0	0	0	0	0	0	0	0	0	0	7	115
USA	2	11	11	2	22	1	3	10	0	1	0	6	7

Source: data analyzed in MAXQDA

Malaysia's yearly data, consistent with its smaller overall corpus, show relatively low and uneven term frequencies across all years. UN references peak in 2021 (16) and again in 2025 (10), while other years show minimal activity (1–4 mentions). USA references show a brief spike in 2022 (15) but are otherwise sparse or entirely absent (as in 2023 and 2026). South China Sea references appear modestly and fairly consistently between 2020 and 2024 (3–7 mentions per year) before disappearing in 2025–2026. Notably, Arbitrage and UNCLOS register zero mentions across the entire observed period, confirming the near-total absence of formal legal-procedural framing in discourse directed at Malaysia, regardless of year (see Table 4).

TABLE 4. MALAYSIA: FREQUENCY OF TERMS THROUGHOUT THE YEARS

	2020	2021	2022	2023	2024	2025	2026
UN	1	16	4	3	4	10	1
SOUTH CHINA SEA	5	7	5	5	3	0	0
CODE OF CONDUCT	2	2	2	0	0	0	0
UNCLOS	0	0	0	0	0	0	0
ARBITRAGE	0	0	0	0	0	0	0
USA	2	3	15	0	1	5	0

Source: data analyzed in MAXQDA

The Philippines exhibits the clearest and most pronounced temporal escalation pattern among all five countries. USA references peak dramatically in 2022 (282 mentions), coinciding with the highest South China Sea count for that year (40) as well, before declining substantially in 2023 (32) and rebounding moderately in 2024 (91). The year 2024 also marks the peak for South China Sea (134), UNCLOS (28), and Arbitrage (23) references — indicating that legal-procedural discourse intensified considerably in this particular year, more than in any other year for any other country in the dataset. UN references follow a less consistent pattern, peaking in 2024 (61) but dropping to zero in 2026. The data for 2026 appear notably lower across nearly all terms, which may reflect a partial-year dataset rather than an actual decline in discourse activity (see Table 5).

TABLE 5. THE PHILIPPINES: FREQUENCY OF TERMS THROUGHOUT THE YEARS

	2022	2023	2024	2025	2026
UN	48	10	61	35	0
SOUTH CHINA SEA	40	63	134	58	8
CODE OF CONDUCT	4	2	4	2	2
UNCLOS	0	4	28	12	0
ARBITRAGE	0	6	23	12	0
USA	282	32	91	34	11

Source: data analyzed in MAXQDA

Vietnam's discourse shows two distinct periods of heightened activity. The first occurs in 2015, with a notable spike in South China Sea references (36) and the only recorded Arbitrage mentions in the entire Vietnam dataset (5). The second, more substantial period of escalation occurs in 2020, when USA references reach their peak (70) alongside elevated South China Sea (38) and the first appearance of UNCLOS references (8) at a meaningful level. UN references show a more gradual upward trend, peaking later in 2022 (21) before declining toward 2025–2026. Notably, both UN and South China Sea references drop to zero in 2026, mirroring the pattern observed in the Philippines and again likely reflecting an incomplete data year rather than a substantive discursive shift (see Table 6).

TABLE 6. VIETNAM: FREQUENCY OF TERMS THROUGHOUT THE YEARS

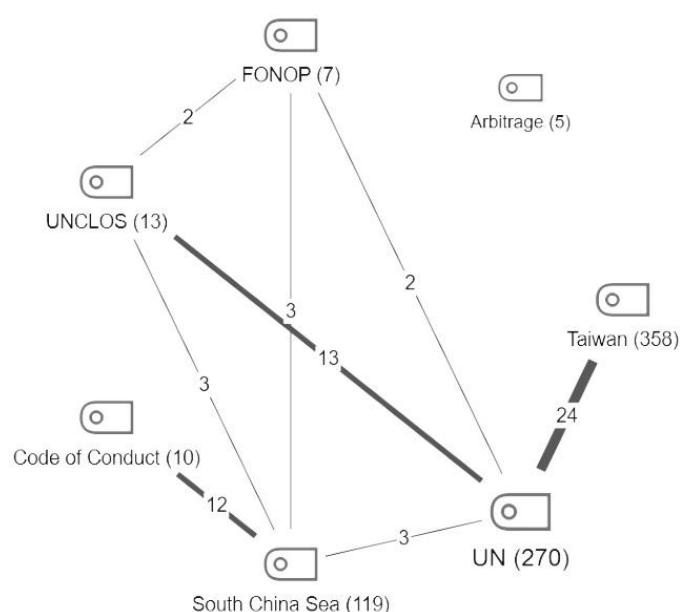
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
UN	0	4	1	0	1	10	11	9	21	2	5	12	0
SOUTH CHINA SEA	0	36	4	3	1	3	38	14	3	5	1	0	0
CODE OF CONDUCT	0	2	0	0	0	0	4	2	4	2	0	0	0

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
UNCLOS	0	0	0	0	0	0	8	2	6	0	0	0	0
ARBITRAGE	0	5	0	0	0	0	0	0	0	0	0	0	0
USA	0	1	0	0	0	1	70	20	12	1	0	0	0

Source: data analyzed in MAXQDA

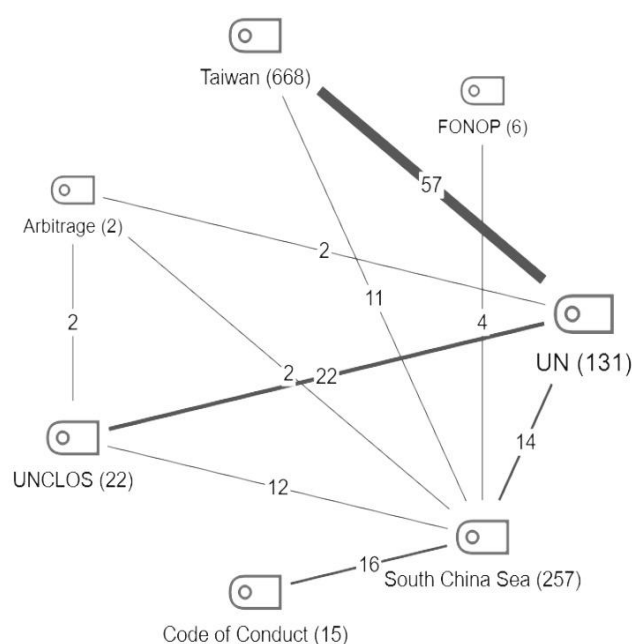
QUALITATIVE DISCUSSION ACROSS CHINA'S EMBASSIES IN SOUTHEAST ASIA

The Indonesian embassy framed the South China Sea mainly as a regional governance issue. The strongest co-occurrence is between South China Sea and Code of Conduct, with 12 intersections, while links with UNCLOS, the UN, and FONOP (Freedom of Navigation Operation) are much weaker. This suggests that Chinese diplomats in Indonesia prefer to emphasise China-ASEAN consultation, stability, and the Code of Conduct process rather than legal confrontation or arbitration. This is consistent with Indonesia's position as an important ASEAN actor but not a direct claimant in the same way as the Philippines or Vietnam. The absence of a link between Taiwan and the South China Sea is also important. It shows that, in Indonesia, Chinese embassy discourse keeps Taiwan as an UN-recognition issue and the South China Sea as a regional maritime issue. Arbitration is isolated, which means China does not want the Indonesian audience to read the South China Sea primarily through the 2016 arbitral ruling (see Graph 2).

GRAPH 2. INDONESIA: NARRATIVE ELEMENTS CO-OCCURRENCE MAP

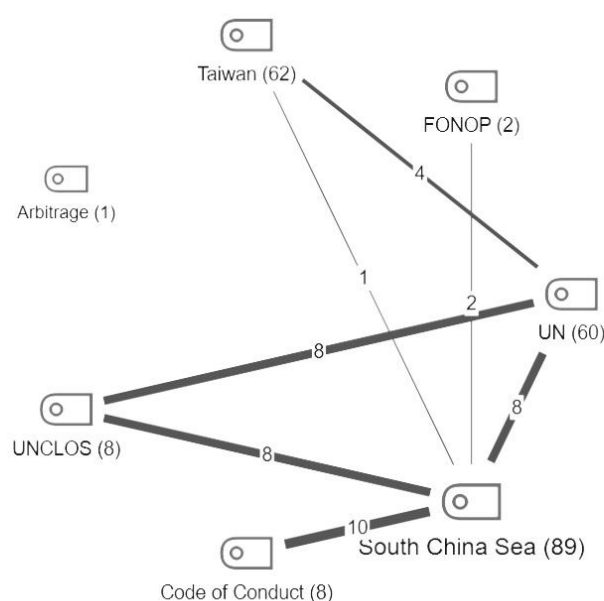
Source: data analyzed in MAXQDA

The Philippine embassy approach is different. Here, the South China Sea appears much more frequently, with 257 references, and it has a wider network of co-occurrences. It is linked to the Code of Conduct, UN, UNCLOS, Taiwan, FONOP, and arbitration. This makes the Philippine case the most politicised and multi-layered of the three. The Code of Conduct still matters, with 16 co-occurrences, but the South China Sea is also more strongly connected to the UN and UNCLOS than in Indonesia. This shows that Chinese diplomats cannot avoid the legal-institutional dimension in the Philippine context. However, arbitration remains surprisingly weak, with only 2 intersections. This is analytically significant: even in the Philippine case, where arbitration is central to Manila's position, Chinese discourse tries to marginalise it and replace it with UNCLOS, regional consultation, and Code of Conduct language. The Taiwan–South China Sea link, with 11 co-occurrences, also distinguishes the Philippine map. It suggests that Chinese diplomats sometimes connect different sovereignty issues into a broader narrative of territorial integrity and external interference, probably because the Philippines is also closely tied to U.S. regional strategy (see Graph 3).

GRAPH 3. THE PHILIPPINES: NARRATIVE ELEMENTS CO-OCCURRENCE MAP

Source: data analyzed in MAXQDA

The Vietnamese embassy discussions are smaller but more concentrated. The South China Sea is the dominant issue, with 89 references, exceeding Taiwan and the UN. Its strongest links are with the Code of Conduct, UNCLOS, and the UN. Compared with Indonesia, Vietnam shows a stronger legal-maritime profile: UNCLOS and the UN are both closely connected to the South China Sea. Compared with the Philippines, however, the Vietnamese discourse is less politicised and less connected to Taiwan or arbitration. The Taiwan–South China Sea co-occurrence is only 1, and arbitration is almost absent. This suggests that Chinese diplomats in Vietnam frame the dispute through controlled legal-regional language: UNCLOS is acknowledged, the Code of Conduct is emphasised, and the UN is present, but arbitration is avoided and Taiwan is kept separate (see Graph 4).

GRAPH 4. VIETNAM: NARRATIVE ELEMENTS CO-OCCURRENCE MAP

Source: data analyzed in MAXQDA

The main comparison is therefore this: in Indonesia, China regionalises the South China Sea; in the Philippines, China has to defend the issue across legal, UN, sovereignty, and security registers; in Vietnam, China balances legal language with regional consultation but avoids escalation into arbitration discourse. Across all three cases, the Code of Conduct is the most consistent positive frame. It allows China to present itself as supporting rules and stability while keeping the issue within the China-ASEAN framework. UNCLOS appears more strongly in the Philippines and Vietnam than in Indonesia, suggesting that legal vocabulary becomes more important when the host state is a direct claimant or has a stronger maritime dispute with China.

The absences are equally revealing. Arbitration is marginal or isolated in all three maps, even though it should be central in any legal discussion of the South China Sea after 2016. This confirms that Chinese embassy discourse tries to de-centre arbitration and replace it with consultation, Code of Conduct, and selective UNCLOS references. FONOP is also weak in all three cases, which suggests that freedom of navigation operations are used only as a supporting criticism of external military interference, not as the main organising frame. Finally, Taiwan and the South China Sea are mostly kept separate, except in the Philippine corpus. This means that China usually does not combine all sovereignty

disputes into one package. It adapts the narrative: Taiwan is mainly about UN recognition and the one-China principle, while the South China Sea is mainly about maritime rights, ASEAN-led management, and resistance to external legal or military pressure (see Table 7).

TABLE 7. SOUTH CHINA SEA ACROSS MOST FREQUENT EMBASSIES

EMBASSY CORPUS	SOUTH CHINA SEA FREQUENCY	STRONGEST SOUTH CHINA SEA LINKS	MAIN FRAMING
INDONESIA	119	Code of Conduct 12; UNCLOS 3; UN 3; FONOP 3	Regional management / ASEAN-China consultation
PHILIPPINES	257	Code of Conduct 16; UN 14; UNCLOS 12; Taiwan 11; FONOP 4; arbitration 2	Highly politicised, legal-institutional, and sovereignty-linked
VIETNAM	89	Code of Conduct 10; UNCLOS 8; UN 8; FONOP 2; Taiwan 1	Compact legal-regional framing, with arbitration largely avoided

Source: data analyzed in MAXQDA

MAJOR ARGUMENTATION ACROSS DIFFERENT EMBASSIES

The qualitative material reveals a shared argumentative architecture across embassies, but also meaningful variation in the intensity and ordering of individual claims. The following subsections reconstruct recurring argumentative sequences: establishing sovereignty and legal legitimacy, defining the preferred procedure for dispute management, delimiting which actors possess a legitimate role, and assigning responsibility for regional instability.

▪ Indonesia: historical-legal legitimation and regionalization

In the Indonesian embassy, discourse first presents China's South China Sea position as historically continuous and legally grounded. Chinese sovereignty over the island groups, associated maritime zones, and historic rights is described as a position maintained consistently by successive Chinese governments. UNCLOS is not rejected; instead, its jurisdictional reach is delimited. The Convention is presented as regulating maritime

entitlements without settling underlying questions of territorial sovereignty, while general international law and historical practice remain relevant. This allows the embassy to claim compliance with international law while resisting interpretations that would make UNCLOS or the 2016 arbitral award an exhaustive source of maritime order².

Historical legitimization is reinforced through a post-Second World War narrative. Embassy statements connect China's recovery and administration of the Paracel and Spratly Islands to the Cairo Declaration, the Potsdam Proclamation, and the post-war settlement, while also recalling U.S. assistance in transporting Chinese personnel to the islands. This reverses the direction of contemporary criticism: U.S. objections are represented as inconsistent with an earlier American role in the post-war order and with China's claim of longstanding exercise of sovereignty. The same logic is applied to U.S. legal interventions, including the 2022 Limits in the Seas report, which Chinese statements portray as a politicized reinterpretation of international law rather than a neutral legal assessment³.

Procedurally, the Indonesian embassy regionalizes the dispute. It promotes a dual-track arrangement in which disagreements are managed directly by the states concerned while China and ASEAN jointly preserve regional peace and stability. The Code of Conduct therefore operates as a positive institutional frame because it supports rules and consultation without transferring authority to external adjudicatory or security actors. In parallel, U.S. freedom-of-navigation activity is framed as an unnecessary external source of tension, while Washington's non-ratification of UNCLOS is used to challenge its legal credibility. Indonesia thus represents a comparatively low-confrontation form of boundary-setting: multilateral and legal language is accepted, but the legitimate arena is defined as bilateral and China-ASEAN consultation⁴.

² Embassy of the PRC in Indonesia, "Ambassador Lu Kang's Interview with CNN Indonesia (Part I): On China-Indonesia Relations and International Regional Issues," 12 August 2022, https://id.china-embassy.gov.cn/sgsd/202208/t20220812_10742618.htm.

³ Embassy of the PRC in Indonesia, "Spokesperson of the Chinese Embassy in Indonesia's Remarks on the Erroneous Statements by U.S. Deputy Assistant Secretary of State Harris Regarding the South China Sea," 15 July 2022, http://id.china-embassy.gov.cn/sgyw/202211/t20221102_10797107.htm.

⁴ Embassy of the PRC in Indonesia, "The United States Is the Real Threat to Regional Peace and Stability—Fallacies and Facts in the U.S. Perception of China, Part IV," 22 June 2022, https://id.china-embassy.gov.cn/sgsd/202206/t20220622_10707607.htm.

▪ **The Philippines: defensive legal counter-framing under direct contestation**

The Philippines retains the same sovereignty-first foundation but develops it in a more defensive and explicitly legal register. Chinese official material presents sovereignty and sovereign rights over the Spratly and Zhongsha island groups, including Huangyan Island, as historically established and consistent with international law. The 2024 Philippine Maritime Zones Act and Archipelagic Sea Lanes Act are consequently represented not as neutral domestic implementation of maritime law but as unilateral attempts to consolidate claims derived from the 2016 arbitral award. The argumentative strategy is therefore to deny the award's jurisdictional and legal authority while simultaneously maintaining that China's own position rests on both historical and legal foundations⁵.

Concrete maritime incidents are incorporated into a defensive narrative of prior Philippine responsibility. In the case of Ren'ai Jiao and the grounded Sierra Madre, embassy statements attribute the creation of the disputed status quo to Philippine actions and unfulfilled commitments to remove the vessel. Chinese conduct is then presented as limited humanitarian accommodation of basic resupply, while opposition to construction materials is justified as resistance to the creation of a permanent military facility. This sequencing is important discursively because it shifts attention from the immediate coercive encounter to an earlier alleged violation and allows China to present subsequent pressure as reactive rather than initiating⁶.

The external-interference argument is strongest in the Philippine case. The United States, Japan, and other outside actors are portrayed as lacking standing in a dispute between China and the Philippines, while U.S. appeals to UNCLOS are challenged through reference to Washington's non-ratification and to the historical record of the post-war settlement. At the same time, the confrontational language is paired with a procedural exit route: China presents continued maritime dialogue, implementation of the Declaration on the Conduct of Parties, and negotiations over the Code of Conduct as the

⁵ Ministry of Foreign Affairs of the PRC, "Statement on the Republic of the Philippines' Enactment of the Philippine Maritime Zones Act and the Philippine Archipelagic Sea Lanes Act," 9 November 2024, republished by the Chinese Embassy in the Philippines, https://ph.china-embassy.gov.cn/sgdt/202412/t20241220_11511608.htm.

⁶ Embassy of the PRC in the Philippines, "Spokesperson's Answer to a Reporter's Question on the Situation at Ren'ai Jiao," 12 April 2024, http://ph.china-embassy.gov.cn/sgfyrbt/202404/t20240412_11280973.htm.

legitimate means of managing differences. The Philippine strategy is therefore dual: it delegitimizes legal and security pressure that constrains China while preserving an image of support for negotiated regional order⁷.

- **Vietnam: controlled legal-regional framing and exclusion of external powers**

In Vietnam, legal and regional language is more tightly integrated. The embassy presents China as complying with international law, including UNCLOS, while simultaneously insisting on the dual-track formula: disputes should be negotiated by the directly concerned sovereign states, whereas peace and stability should be maintained collectively by China and ASEAN. The Declaration on the Conduct of Parties, negotiations over the Code of Conduct, practical maritime cooperation, and joint development provide the positive programmatic component of this frame. The result is a legal-regional narrative in which law is acknowledged but dispute settlement remains politically bounded by bilateral and ASEAN-centered procedures⁸.

Freedom of navigation is similarly reframed as an already protected regional public good rather than as a problem requiring external enforcement. Chinese statements emphasize the economic dependence of China and neighboring states on stable sea lanes and use this shared interest to argue that regional countries possess both the incentive and the capacity to safeguard navigation. This supports a broader claim that external military intervention is unnecessary and potentially destabilizing, while allowing China to present

⁷ Embassy of the PRC in the Philippines, "Spokesperson's Answer ... on the Eighth Anniversary of the South China Sea Arbitral Award," 13 July 2024, https://ph.china-embassy.gov.cn/sgfyrbt/202407/t20240713_11453355.htm; and "Spokesperson's Answer ... Regarding the U.S. Ambassador's Remarks on the South China Sea," 15 September 2024, https://ph.china-embassy.gov.cn/chn/sgdt/202409/t20240915_11491415.htm.

⁸ Embassy of the PRC in Vietnam, "Solemn Statement by the Chinese Embassy in Vietnam on the Erroneous China-Related Remarks Made by a U.S. Official in Vietnam," 23 November 2020, http://vn.china-embassy.gov.cn/chn/sgxw/202011/t20201123_1703467.htm.

itself as both a defender of sovereign rights and a stakeholder in open maritime communication⁹.

The United States is consequently constructed as the principal externalizer of the dispute. Embassy statements associate U.S. policy with maritime hegemony, military demonstrations, Cold War or zero-sum thinking, and efforts to disrupt existing bilateral dialogue. During the COVID-19 period, this external-interference frame was combined with a defensive self-presentation in which China maintained that it would protect sovereignty and jurisdiction while avoiding deliberate provocation and prioritizing dialogue over confrontation. The Vietnamese case therefore illustrates controlled legal regionalism: UNCLOS is more visible than in Indonesia, but arbitration is avoided and legitimate dispute management is kept within bilateral and ASEAN channels¹⁰.

- **Malaysia and Brunei: lower-intensity profiles and limits of qualitative inference**

The current draft does not contain equivalent primary-source excerpts for Malaysia and Brunei, so their argumentative repertoires cannot be reconstructed with the same confidence as the three cases above. The quantitative evidence nonetheless identifies distinct profiles. Malaysia displays a low and uneven level of South China Sea discourse, with no recorded arbitration or UNCLOS references in the observed period and only a temporary rise in U.S. references in 2022. Brunei shows the opposite temporal pattern: a concentrated legal-territorial spike in 2014–2015, especially for arbitration and South China Sea references, followed by a marked decline and a comparatively steadier UN vocabulary. These patterns are analytically suggestive, but additional KWIC material and

⁹ Embassy of the PRC in Vietnam, "Solemn Statement by the Chinese Embassy in Vietnam on the Erroneous China-Related Remarks Made by a U.S. Official in Vietnam," 23 November 2020, http://vn.china-embassy.gov.cn/chn/sgxw/202011/t20201123_1703467.htm.

¹⁰ Embassy of the PRC in Vietnam, "Chinese Embassy in Vietnam Responds to Remarks Attacking China Made by U.S. Ambassador to Vietnam," 30 April 2020, https://vn.china-embassy.gov.cn/sgxw/202004/t20200430_1703396.htm. and Embassy of the PRC in Vietnam, "The Chinese Embassy in Vietnam Holds a Video Press Conference on the COVID-19 Pandemic," 8 May 2020, https://vn.china-embassy.gov.cn/chn/sgxw/202005/t20200508_1703403.htm.

embassy-source excerpts are required before attributing specific qualitative frames to either post.

▪ **Cross-embassy comparison: a shared argumentative architecture with localized emphasis**

The embassy narratives follow a four-step discursive logic. First, sovereignty and maritime rights are established as prior and historically continuous facts. Second, international law is selectively authorized: UNCLOS is invoked where it supports China’s legal credibility, but its competence and the authority of arbitration are restricted when they challenge China’s claims. Third, legitimate procedure is regionalized through bilateral negotiation, ASEAN, the Declaration on the Conduct of Parties, and the Code of Conduct. Fourth, responsibility for escalation is externalized, above all toward the United States, which is represented as a non-regional actor using law, military presence, and alliance politics for geopolitical purposes. What varies across embassies is therefore not the basic architecture but its emphasis: Indonesia foregrounds historical-legal legitimation and consultation; the Philippines combines defensive legal counter-framing with sovereignty and security arguments; and Vietnam places the greatest weight on controlled legal-regional management and non-interference. The pattern is best understood as adaptive localization of a common Chinese narrative rather than as inconsistent embassy messaging (see Table 8).

TABLE 8. MOST PROMINENT ARGUMENT TYPES ACROSS EMBASSIES

EMBASSY CORPUS	MAIN ARGUMENT TYPE	MAIN FUNCTION IN CHINA’S NARRATIVE
INDONESIA	HISTORICAL AND LEGAL	Establishes China’s claims as rooted in longstanding practice, WWII settlements, and historical continuity across successive governments.
THE PHILIPPINES	INTERNATIONAL LAW	Presents China’s position as having a legal basis while challenging interpretations of UNCLOS and the validity of the arbitration ruling.

VIETNAM**NON-INTERFERENCE AND
REGIONAL COOPERATION**

Argues that non-claimant states have no legitimate role in the dispute while framing the South China Sea as a regional issue to be managed by China and Southeast Asian states through ASEAN mechanisms.

Source: Authors' analysis based on the embassy documents cited in this section.

CONCLUSIONS

The findings answer the research questions by showing that Chinese embassy discourse on the South China Sea is neither primarily legal nor simply geopolitical. It is a hybrid legitimacy strategy in which legal vocabulary is embedded within a sovereignty-first and regionally bounded conception of order. The UN provides a broad language of international legitimacy, but operational dispute management is pushed toward bilateral and ASEAN-centered settings; at the same time, the United States is positioned as the external actor whose involvement explains escalation. The central discursive maneuver is therefore a form of jurisdictional sorting: China accepts institutions, legal vocabularies, and multilateral procedures that reinforce consultation and sovereignty, while marginalizing adjudicatory mechanisms and external security roles that could constrain its preferred regional order.

REFERENCES

1. Embassy of the People's Republic of China in the Republic of Indonesia. (2022a, August 12). *Ambassador Lu Kang's interview with CNN Indonesia (Part I): On China–Indonesia relations and international regional issues*. https://id.china-embassy.gov.cn/sgsd/202208/t20220812_10742618.htm
2. Embassy of the People's Republic of China in the Republic of Indonesia. (2022b, July 15). *Spokesperson of the Chinese Embassy in Indonesia's remarks on the erroneous statements by U.S. Deputy Assistant Secretary of State Harris regarding the South China Sea*. http://id.china-embassy.gov.cn/sgyw/202211/t20221102_10797107.htm
3. Embassy of the People's Republic of China in the Republic of Indonesia. (2022c, June 22). *The United States is the real threat to regional peace and stability—Fallacies and facts in the U.S. perception of China, Part IV*. https://id.china-embassy.gov.cn/sgsd/202206/t20220622_10707607.htm
4. Embassy of the People's Republic of China in the Republic of the Philippines. (2024a, April 12). *Spokesperson of the Chinese Embassy in the Philippines' answer to a reporter's question on the situation at Ren'ai Jiao*. http://ph.china-embassy.gov.cn/sgfyrbt/202404/t20240412_11280973.htm
5. Embassy of the People's Republic of China in the Republic of the Philippines. (2024b, July 13). *Spokesperson of the Chinese Embassy in the Philippines' answer to a reporter's question regarding the Philippine Department of Foreign Affairs' commemorative statement on the eighth anniversary of the South China Sea arbitral award*. https://ph.china-embassy.gov.cn/sgfyrbt/202407/t20240713_11453355.htm
6. Embassy of the People's Republic of China in the Republic of the Philippines. (2024c, September 15). *Spokesperson of the Chinese Embassy in the Philippines' answer to a reporter's question regarding the remarks by the U.S. ambassador to the Philippines on the South China Sea*. https://ph.china-embassy.gov.cn/chn/sgdt/202409/t20240915_11491415.htm

7. Embassy of the People's Republic of China in the Socialist Republic of Vietnam. (2020a, April 30). *Chinese Embassy in Vietnam responds to remarks attacking China made by U.S. ambassador to Vietnam.* https://vn.china-embassy.gov.cn/sgxw/202004/t20200430_1703396.htm
8. Embassy of the People's Republic of China in the Socialist Republic of Vietnam. (2020b, November 23). *Solemn statement by the Chinese Embassy in Vietnam on the erroneous China-related remarks made by a U.S. official in Vietnam.* http://vn.china-embassy.gov.cn/chn/sgxw/202011/t20201123_1703467.htm
9. Embassy of the People's Republic of China in the Socialist Republic of Vietnam. (2020c, May 8). *The Chinese Embassy in Vietnam holds a video press conference on the COVID-19 pandemic.* https://vn.china-embassy.gov.cn/chn/sgxw/202005/t20200508_1703403.htm
10. Ministry of Foreign Affairs of the People's Republic of China. (2024, November 9). *Statement on the Republic of the Philippines' enactment of the Philippine Maritime Zones Act and the Philippine Archipelagic Sea Lanes Act.* https://ph.china-embassy.gov.cn/sgdt/202412/t20241220_11511608.htm



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