



Written Submission – 18.03.2026

Formal Submission to the UNESCO Global Dialogue on AI Governance

(in response to the Guiding Questions for the consultation)

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1. Problem Statement: From Fragmentation to Functionality

Global AI governance is at a critical juncture. While numerous frameworks—such as the EU AI Act, OECD AI Principles, and UNESCO’s Recommendation on the Ethics of AI—have established important normative foundations, their coexistence increasingly produces fragmentation rather than coherence.

The central challenge is no longer the articulation of principles, but their translation into **operational, enforceable, and interoperable governance structures**. Without this transition, governance risks remaining declaratory, limiting both its effectiveness and scalability across jurisdictions.

2. Interoperability as a Core Condition of Governance

Interoperability must be understood not merely as technical compatibility, but as **alignment across legal, regulatory, and institutional systems**.

Diverging regulatory approaches—risk-based, sector-specific, or principle-driven—are emerging globally. Without mechanisms for interoperability, these differences create:

- compliance complexity for organizations operating cross-border
- reduced enforceability of governance standards
- barriers to innovation and international cooperation

Effective governance therefore depends on achieving **functional equivalence**, not uniformity. Interoperability enables diverse systems to interact coherently while preserving regulatory sovereignty.



3. Bridging the Gap: From Principles to Implementation

A key structural gap persists between **principle-based governance** and **operational governance**.

Existing frameworks successfully define values such as transparency, accountability, and human oversight. However, they often lack:

- clear implementation pathways
- standardized monitoring mechanisms
- enforceable accountability structures

Bridging this gap requires a shift toward:

- documentation and audit requirements
- traceable accountability chains
- institutionalized oversight mechanisms

Governance must evolve from abstract guidance to **practical architectures that can be implemented, monitored, and enforced**.

4. Governance Building Blocks for Global Alignment

To enable interoperability and implementation, a limited set of **governance building blocks** should be identified and developed across jurisdictions. These include:

- **Transparency standards** (e.g., documentation, disclosure obligations)
- **Accountability mechanisms** (e.g., responsibility allocation, liability interfaces)
- **Human oversight requirements** (e.g., decision review structures)
- **Audit and compliance processes**

These components should be designed for **adaptability across legal systems**, ensuring functional compatibility while respecting regulatory diversity.



5. Integrating Legal, Technical, and Organizational Dimensions

AI governance operates within complex legal ecosystems and cannot be addressed in isolation.

Critical intersections include:

- intellectual property law
- data protection regimes
- liability frameworks
- sector-specific regulation

In addition, governance must account for the **interaction between technical system design and legal accountability structures**.

From a research perspective, distinguishing between **semantic and syntactic elements of AI-generated content**, as well as clarifying **human contribution and responsibility**, can support more precise governance models—particularly in areas such as authorship, attribution, and rights allocation.

Effective governance therefore requires an **integrated approach**, combining legal analysis, technical understanding, and organizational implementation practices.

6. The Role of the Global Dialogue: From Forum to Coordination Layer

The Global Dialogue on AI Governance should not function as an additional forum for high-level exchange, but as a **coordination layer** between existing initiatives.

Its added value lies in:

- identifying overlaps, gaps, and divergences between frameworks
- facilitating mutual understanding of regulatory models
- supporting the development of interoperability mechanisms
- translating technical insights into policy-relevant outputs

Furthermore, the Dialogue should establish **ongoing working structures**, enabling sustained cooperation beyond single events.



7. Inclusive and Effective Participation

Meaningful governance requires the inclusion of perspectives that are currently underrepresented, including:

- small and medium-sized enterprises (SMEs)
- practitioners at the intersection of law, technology, and implementation
- stakeholders from emerging and developing AI ecosystems
- actors from cultural and creative industries

However, inclusiveness alone is insufficient. Participation must be **structured and outcome-oriented**, ensuring that diverse inputs are translated into coherent and actionable outputs.

8. Conclusion: From Fragmentation to Interoperable Governance

The effectiveness of global AI governance will depend on its ability to move:

- from principles to implementation
- from fragmentation to interoperability
- from isolated initiatives to coordinated architectures

Interoperability emerges as the central condition for achieving governance that is both **effective and scalable**.

The Global Dialogue represents a unique opportunity to initiate this transition—by focusing not only on what AI governance should be, but on **how it can function in practice across jurisdictions**.