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Huawhy? Analyzing Reactions from EU-Countries towards banning the Chinese Telecommunication Company from their 5G Networks

Name: Annemieke Wibel
Student Number: 3059804
Study Program: Public Governance across Borders
First Supervisor: Shawn Donnelly
Second Supervisor: Veronica Junjan

Abstract

In 2020 there was a global debate surrounding the potential cybersecurity risk that implementing Huawei 5G technology poses and pressure especially from the U.S. onto EU member states to avoid the Chinese manufacturer. The EU left the final response up to each member state. The main research question of this Bachelor Thesis is: What are the reasons for the different reactions from Sweden, Germany, and Austria towards the EU Commissions Security Recommendation to avoid Huawei in constructing 5G-Infrastructure? This Thesis' research design is a comparative case study and uses a qualitative content analysis to analyze the debates within each country through a proxy of parliamentary debates, newspaper articles and other documents with the help of the tool atlas.ti. The thesis uses the international relations theories of Waltian Realism, Waltzian Realism and Neoliberalism to explain each country's approach. Sweden's ban on Huawei can be considered a Waltian realist reaction, while Germany's response changes with the change in government. It is not fully explainable with the introduced theories, but changes from a Neoliberal-leaning to a more Waltian Realist approach. Austria did not regulate the use of Huawei 5G equipment, which might be explained by Neoliberalism or the country's commitment to its neutrality.

List of Abbreviations

5G - 5th Generation mobile network

Art. - Article

AI - Artificial Intelligence

BMI - Bundesministerium des Innern und für Heimat [Federal Ministry of the Interior and Community of Germany]

BMDV- Bundesministerium für Digitales und Verkehr [Federal Ministry for Digital and Transport of Germany]

BMLRT - Bundesministerium für Landwirtschaft, Regionen und Tourismus [Federal Ministry of Agriculture, Regions and Tourism of Austria]

Di - Dagens Industri

EU - European Union

FAZ - Frankfurter Allgemeine Zeitung

FBI - Federal Bureau of Investigation

H - Hypothesis

IoT - Internet of Things

LEK - Lagen om elektronisk kommunikation [Law regarding electronic communication]

NATO - North Atlantic Treaty Organization

NGO - Non-Governmental Organization

NLEK - Nya lagen om elektronisk kommunikation [New law regarding electronic communication]

PTS - Post- och Telestyrelsen [Post and Telecom Authority of Sweden]

RAN - Radio Access Network

RTR - Rundfunk und Telekom Regulierungs-GmbH [Radio and Telecomregulation Company of Austria]

SäPo - Säkerhetspolisen [Swedish Security Service]

taz - Die Tageszeitung

TT - TT Nyhetsbyrån [TT News Agency]

svt – Sveriges Television [Swedens Television]

SZ - Süddeutsche Zeitung

UK - United Kingdom

U.S. - United States of America

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1. Introduction

"[5G enables] the Internet of Things (IoT), Artificial Intelligence (AI), driverless cars, digital reality, blockchain, and future breakthroughs we haven't even thought of yet. The advent of 5G is more than just a generational step; it opens a new world of possibilities for every tech industry" (Attaran, 2023, p. 5977). Given that 5G is the steppingstone to so many technological advances, it is of course in every countries interest to advance the construction of its 5G infrastructure. In 2016 the EU-Commission even produced a "5G-Action Plan", thereby outlining the importance for its member states and highlighting founding opportunities. But this is not simply a question of whether to invest in new infrastructure. There are only a few companies, which can provide 5G technology. The largest manufacturer globally is the Chinese telecommunications giant Huawei.

U.S. intelligence considers Huawei equipment a cyber espionage risk. The FBI investigated the usage of Huawei mobile communication equipment and alleged that communications within the U.S. department of defense such as to parts of the U.S. nuclear arsenal could be manipulated (Lillis, 2022). While the company is not controlled by the Chinese government, governments of the United States and Australia consider the possibility, that the tech company could be forced by the Chinese government to hand over data (Berman et al., 2019). The U.S. pressured its allies to avoid using Huawei equipment, threatening to no longer share intelligence in such cases (Finley, 2019). Huawei has denied the accusations from the U.S. government (Berman et al., 2019). While this is one specific point of tension between the U.S. and China, the relationship between these two countries generally is gradually decreasing, placing other countries in the field of tension between them (Mattu, 2023).

The European Commission reacted to this global debate and pressure from its allies in March 2019 by publishing a Cybersecurity Recommendation for its member states. It provides member states with non-binding recommendations for deploying 5G telecommunication technology. One aspect the Commission highlights for member states is to consider " […]the overall risk of influence by a third country, notably in relation to its model of governance […]" (Commission Recommendation (EU) 2019/534, 2019, art. 20) when choosing their suppliers. Within the whole recommendation the Commission did not even name Huawei and left the decision to each member state. There is not only one risk associated with the question of whether or not to ban Huawei equipment, but banning some manufacturers from providing 5G equipment puts countries at risk for delaying the implementation of 5G in their countries (Kleinhans, 2019, p. 18). Given this complicated decision each country has to make, this Thesis asks:

What are the reasons for the different reactions from Sweden, Germany and Austria towards the EU Commissions' Security Recommendation to avoid Huawei technology in constructing 5G-Infrastructure?

In order to explore this question, this paper will first ask the sub question: *What are the different reactions from Sweden, Germany and Austria towards this EU Commission Security Recommendation?*

In order to answer the research question, I am using the international relations theory of Neoliberalism, Waltzian Realism and Waltian Realism, which I have operationalized into the following hypothesis:

H_1: If a country follows a neoliberal approach to the EU Security Recommendation the options of its national telecommunication providers to use Huawei will not be limited.

H_2: A country's response can be considered Waltzian realist if a national government outlaws or severely restricts the opportunities of its national telecommunication providers to choose Huawei to enhance their independence from China.

H_3: A Waltian realist response can be seen if a national government outlaws or severely restricts the opportunities of its national telecommunication providers to choose Huawei as a reaction to a threat point to national security.

The topic of bans on Chinese manufactured 5G infrastructure can be seen as an indication of the general position of EU countries towards China. Potential shifts in the strategy of the different countries' behavior on whether to limit Huawei as a manufacturer can be considered as a proxy for a general change of their foreign policy, making this current and relevant issue to study.

Several academic articles have been written regarding the reaction of countries all over the world to the 5G infrastructure technology by Huawei. Given the global implications, most of these articles do not focus on Europe or the European Union. Additionally, the latest developments in Germany unfolded in March of 2024, which means, that academic literature does not include these recent shifts yet (Hölzl et al., 2024). There are some scientific articles that have been written regarding the Huawei 5G bans or lack thereof throughout Europe (Calcara, 2023; Krolikowski & Hall, 2023; J.-Y. Lee et al., 2022; Y. J. Lee, 2022). The research gap for this Bachelor Thesis can be seen in both using the lens of the theories chosen for the Bachelor as well as the country selection. Calcara for instance does not consider factors concerning international relations but only considers the domestic political system of the chosen case studies as well as the concept of noisy politics (2023, p. 454). J.-Y. Lee et al. consider the three of the closest U.S. allies in Asia and their reactions to the pressure from the U.S. under the lens of the alliance halo (2022, p. 486). Krolikowski & Hall even consider Germany, but only for a comparison to other "middle-powers" like Japan and UK and do not discuss the EU aspect of this dilemma (2023, p. 182).

2. Theory

In order to explain the different reactions to the recommendations by the EU, this paper looks at the different considerations of these countries and how they can be explained through the international relations theories of Neoliberalism, Waltzian Realism and Waltian Realism.

There are some basic similarities between these three theories on international relations. Firstly, the theories understand actors as changing their actions based on different incentives within both Waltian and Waltzian realism. Neoliberalism consider the state behavior to be rational (Keohane & Nye, 1987, pp. 728–729) While the reactions of the states are the final product of the domestic and international discussions, it is important to not only recognize states as actors. Other key actors are the telecommunication companies, which are responsible for constructing the 5G network, in most cases there are only a few companies that dominate this for each country (Calcara, 2023, p. 444). Besides these companies there are several political actors which yield some influence over any final decision. These of course include the national governments and the opposition, but especially with Germany and Austria being federal republics, lower levels of governance may also play a role. Compared to companies which must consider options to be profitable, political actors must advocate for solutions for which their constituents reward them with a reelection.

2.1 Neoliberalism

Neoliberalism argues that a cooperation between states creates networks that result in a reciprocal dependence, which can deter states from initiating conflicts, as a state would automatically hurt itself too (Nye, 2017, p. 58). This international relations theory does not only consider states as actors but also civil society, NGOs or cooperations as well (Keohane & Nye, 1987, p. 727). This can be seen with international interactions between companies for instance, that are not controlled by governmental foreign policy actors (Nye & Keohane, 1971, pp. 330–331). This liberal understanding has supported the fragmentation of supply chains most notably in the case of offshoring production to countries with cheaper labor or material costs (Feenstra, 1998, pp. 35–37). Over the last 20 years this trend has changed towards "friend shoring", which means moving production to allied countries (Aiyar et al., 2024, pp. 1, 9). Relating this neoliberalist approach to the specific topic of this Bachelor's Thesis this can be summarized as follows: If a country follows a neoliberal approach to the EU Security Recommendation, then it will not limit the options of its national telecommunication providers to use Huawei.

2.2 Waltzian Realism

A different approach arises from a concept of Realism, which focusses on states as the decisive actor and how states work to ensure their survival in the anarchic international system (Waltz, 1987, pp. 102–104). As there are no rules within the international system, but states still want to survive, states will try to connect themselves with other states to form alliances. As the weaker side has more urgency to attract other states to join them, they provide better incentives. This can theoretically results in a balance of power (Waltz, 2014, pp. 121–122), which can stabilize the anarchic international system. To alleviate their vulnerabilities, states at the same time try to limit their dependency on other states and promote their independence wherever possible (Waltz, 2014, pp. 114–115). This can happen with two mechanisms or a mix thereof: Internal and External Balancing (Waltz, 2014, p. 117), which have similarities to the aforementioned Friendshoring and Onshoring. Waltz defined internal efforts as "moves to increase economic capability, to increase military strength, to develop clever strategies" (2014, p. 117). While external efforts mean "moves to strengthen and enlarge one's own alliance or to weaken and shrink an opposing one" (Waltz, 2014, p. 117). In the context of this Thesis Internal Balancing for example for Sweden could mean Sweden was to rely on Ericsson, their domestic 5G-equipment-manufactuer. External Balancing would be banning a corporation for constructing the 5G network with a Chinese company to limit their access to Swedish Know-How. Both concepts can also apply in a larger context for example in choosing a mixture of different European manufacturers to develop know-how within the EU. For the purpose of this Thesis: A country's response can be considered Waltzian realist if a national government outlaws or severely restricts the opportunities of its national telecommunication providers to choose Huawei to enhance their independence from China.

2.3 Waltian Realism

Waltian realism is a different form of realism and argues, that a balance-of-power is no automatism in itself, but a result of a perceived threat such as aggressive intentions by a state (Walt, 2019, pp. 21–22). According to Walt, a threat is the trigger to set mechanisms like bandwagoning and balancing in motion (Walt, 2019, p. 17). Besides bandwagoning, where states search alignment with such states, that are posing a threat, and balancing, where states come together to form a counterweight against the threatening states, there is another mechanism called ideological solidarity (Walt, 2019, pp. 37–38). This means that it is unlikely that a state in a fairly secure position will bandwagon with a threatening state if they are opposing each other's ideological position (Walt, 2019, p. 39). In the context of this Thesis, it is unlikely that a member of the European Union or NATO will ally with China due to a threat. Such a threat point can be seen in the increasingly hostile relations between China and the U.S. and the EU respectively and thus the possibility of Huawei technology being used against the governments, whose 5G network depends on them. The decision of which manufacturer to choose for their 5G network is in principle made by the national telecommunication companies, but states can intervene if they deem it necessary for security. Translated to the context of this Bachelor Thesis a response can be considered Waltian, if a national government outlaws or severely restricts the usage of Huawei as a perceived threat point.

2.4 Hypothesis

Concluding the three Hypotheses for the Bachelor Thesis will be:

H_1: If a country follows a neoliberal approach to the EU Security Recommendation, then it will not limit the options of its national telecommunication providers to use Huawei.

H_2: A country's response can be considered Waltzian realist if a national government outlaws or severely restricts the opportunities of its national telecommunication providers to choose Huawei to enhance their independence from China.

H_3: A country's response can be considered Waltian realist if a national government outlaws or severely restricts the opportunities of its national telecommunication providers to choose Huawei in reaction to a national security threat point.

3. Methodology

3.1 Research Design

The research design chosen for this Bachelor Thesis is a comparative case study between Sweden, Austria and Germany. In order to find an answer to the research question, this paper will investigate what the motivations for the different countries were in making their different decisions. Analyzing important parts of the respective public debates can help to illustrate where the main focus was placed by the respective countries and how this decision relates to the theories introduced in the theoretical framework. For this comparative case study, each country's response to the EU Security Recommendation is considered the dependent variable. The independent variables will be different aspects like their perceived geopolitical threat, prioritization of economic strategy as well as other domestic motivations. The analysis will be limited to the time period between February 2019, when the U.S. threatened to withhold intelligence from its EU allies if they implement 5G technology and March 2024, which marked the last change in position within Germany (Finley, 2019; Hölzl et al., 2024).

The approach of this Thesis is to compare three different approaches to this EU Security Recommendation by countries, which otherwise share similar conditions. All three countries are part of the EU and thus shape the Common Foreign and Security Policy as well as share similarities in terms of the strength of their economy and their democratic institutions. They all consider 5G to be a key technology for the future and want to build up a 5G infrastructure. These countries also share similarities in their relations to China. For each of the countries China is one of the largest trading partners (for Sweden and Germany even the largest). Similarly, while Sweden and Austria were not part of NATO at the time of their decision making in 2020 and 2021, all three countries have long-standing and good relations with the U.S. This puts them between the frontlines of the two superpowers in their increasing rivalry. Also, considering the history of each country's bilateral relation to Beijing, none of them have a long-standing conflict. While all countries economically depend on China, they all condemned the treatment of the Uyghur minority and the human rights violations that were documented in the Xinjiang region. (France ONU, 2021).

Needless to say, the countries also present a number of differences in some important points. One relevant difference can be seen in the distribution of 5G companies throughout the world, as the second largest provider of 5G equipment is the Swedish company Ericsson, while neither Germany nor Austria have any domestic options for a 5G technology manufacturer. While Sweden has joined NATO in March of 2024 only Germany has been a part of a military alliance with the U.S. for decades (NATO, 2024). There is also a difference in the attitude towards national security in general, which can be approximated with conscription laws in each country. Germany has suspended its conscription regulation in 2011 citing that it is surrounded by friends (Schillat, 2023). Austria still has its general conscription for all adult males, and Sweden widened its partial conscription to include women as of 2017 (Persson & Sundevall, 2019).

I expect to find mostly realist tendencies for Sweden, since the country is comparatively security oriented. For Germany I expect to find a shift from neoliberal arguments that stem from the "Wandel durch Handel" approach towards a more realist one with rising international tensions between the NATO/EU and China. For Austria my expectation is a neoliberal approach, since the country prides itself on its neutrality and it is unlikely that they would be aggressive towards China in such a way.

3.2 Method of data collection

In order to investigate the reasons behind each country's response I want to analyze parliamentary or committee debates, parliamentary inquiries and statements from ministers/relevant politicians to get an understanding of the political discussion within each country. News articles, think tank opinions and press releases from Telecommunication companies will help to complete the picture of the public debate in each country and how each response came together. In each case the time frame was limited from February 2019 to March 2024. For most newspaper sources the platform LexisNexis was used. There are specific challenges in each country, which will be outlined below, a full list of the documents which were analyzed can be found in the appendix.

As the Swedish response was based on an administrative act by the Swedish Post and Telecom Authority (PTS) and upheld by the *Förvaltningsrätten i Stockholm* (The administrative court in Stockholm), the reasonings given by the PTS and the court will be included. Two Committees in the Swedish Parliament held hearings on the topic of 5G. The hearings of the Committee of Foreign Affairs, were unfortunately not open to the public (Utrikesutskottet, 2021a, p. 1, 2021b, p. 3). Therefore, only the hearing of the Committee on Transportation and Communications are available for Analysis. There were no statements by any of the eight parties in the *Riksdag*, neither within their election platforms nor more generally on the party websites, regarding Huawei, 5G, China or cyber security risks. For the Swedish Media three news sources were included: The boulevard paper *Aftonbladet*, which considers itself socially democratic and independent, the business oriented *Dagens Industri* and the public broadcaster *svt* (Chan, 2021).

The German response can be seen in the IT-Sicherheitsgesetz 2.0. Therefore, the parliamentary debate in the Bundestag as well as the corresponding session is the Committee for the Interior and Community, will be the starting point. During the 30-minute-long plenary session in the Bundestag all political parties were able to give their opinion, showing both reasoning by the government and critique by the opposing parties. During the debate in the sub-commission, selected experts were invited to give a statement and an open call for statements gave the opportunity for other NGOs, companies, organizations etc. to also voice their opinion on this matter. As the law also considered other aspects than the construction of telecommunication networks, such as introducing new criminal offenses on cyber security or new reporting requirements for companies, only statements that either included "5G", "Huawei" or "§ 9b"[1] were considered. This excluded 10 out of the 26 total statements, leaving the 16 described above. As Germany is a federally organized state the Bundesrat forms a representation of the governments of the Federal States. It is important to note, that the issue of telecommunications law, lies solely in the responsibility of the Federal Government (Wissenschaftlicher Dienst des Deutschen Bundestages, 2007, p. 3). Therefore, the Bundesrat only produced a statement, which is included in the analysis. For the analysis of media, three newspapers were chosen: the liberal *Süddeutsche Zeitung* (SZ), the conservative *Frankfurter Allgemeine Zeitung* (FAZ) and the left leaning *Die Tageszeitung* (taz) (Bernklau, 2024). As the FAZ published almost 580 articles that related somewhat to 5G, Huawei and Germany only those that fully focused on the topic of this Bachelor Thesis were included.

Austria did not pass a law or reached a legal decision, which can be seen as the manifestation of the country's response. Therefore, a different approach had to be used to put together the circumstances, which lead to the lack of a clear response. I started with researching parliamentary inquiries on the website of the Austrian Parliament and subsequent statements from the Austrian Government. As the inquiries are fully quoted in the ministry statements, I focused only on the responses. Searching for "5G" in the title and sorting out documents relating to health concerns or updates on the status of expansion. The ministries in charge are the Ministry for Agriculture, Regions and Tourism[2] (BMLRT) and the

[1] This is the paragraph of the law, which concerns critical infrastructure and the potential ban on parts.

[2] This ministry is also in charge for telecommunication.

Ministry of Defense. The Ministry of Defense is not answering any parliamentary inquiries that can reveal information on national security aspects (Tanner, 2020, p. 1) and all other ministries refer to the statements made by BMLRT (Gewessler, 2020; Köstinger, 2020). This only left two statements. Finding committee hearings on this topic was equally difficult. One hearing was held in the Committee for Petitions and Citizens initiatives, which was concerned with the alleged health risks of 5G infrastructure. The other committee, which was supposed to have hearings on 5G, was the Committee of Consumer Protection. Unfortunately, this scheduled hearing on this topic never actually took place as the national parliament dissolved itself following the Ibiza-affair in 2019. Therefore, only the petition by members of parliament can be analyzed. Austria - like Germany- is federally organized. The Austrian *Bundesrat* held a session on the topic of 5G infrastructure, which represents the governments of the Federal States of Austria. In order to get an overview of the news media, two quality newspapers the liberal-conservative *Die Presse* and economically liberal and left-liberal *Der Standard* were chosen in addition to the two largest Austrian boulevard newspapers *Kronen Zeitung* and the Catholic-conservative *Kleine Zeitung* (Demmel & Huber, 2023; Neubach, 2012, pp. 26, 33). As the tabloid newspapers only published little on this matter, the majority of news sources was taken from *Die Presse* and *Der Standard*.

3.3 Method of data analysis

For this qualitative data analysis the method of data analysis is based on the structural qualitative content analysis by Philipp Mayring (Mayring & Fenzl, 2022, p. 696). This approach starts with transforming the theory into a coding scheme (Mayring, 1995, p. 212). In order to operationalize the independent variables, I am looking for the reasons that are given whether or not to outlaw Huawei or arguments in these efforts more broadly.

For the concrete geopolitical concerns and threats which pertain to Waltian Realism this could be reasons that relate to China being considered a "cybersecurity [risk]" (2019, art. 19) or a country with an opposed "model of governance" (2019, art. 20) as outlined by the EU Commission in their 5G Security Recommendation. At the same time mentioning the mutual dependency that comes from the cooperation with Huawei or the economic opportunities that arise from a cooperation relate to a neoliberal explanation. In the case of Waltzian realism this could be codes that mention strengthening European know-how or promoting independency rather than being dependent on China.

For the case that none of the introduced theories can explain the reasons given by a country, I will use ad-hoc codes. In order to analyze the reasons that are given for a decision by a state, I will use a qualitative data analysis with the tool *atlas.ti*. Given the deductive codes that stem from the theories and the ad-hoc codes that will be used to get a more comprehensive picture, this means that I will use a mixture of inductive and deductive codes. The deductive codes are evaluated after roughly half of the material, which is to be coded and the respective codes can be amended to better fit the actual material that is being coded (Mayring, 1995, p. 212). These amended codes are the ones listed below. While it is not possible to assume that a code that is used twice as often as a different code is twice as important, it is reasonable to assume that codes that are more prevalent tend to reflect more relevant aspects (Mayring, 2012, p. 33).

To illustrate these categories quotes are used as *anchorexamples* (Mayring & Fenzl, 2022, p. 696). The full codebook including the anchorexamples can be found in the appendix. The codes are organized alphabetically.

Table 1. Coding Scheme for Neoliberalism

Neoliberalism	
Code	Explanation

Allow Huawei to save costs and time	Arguments that relate to the economic benefits of not banning Huawei from being an option to construct the national 5G networks.
Interdependency over independence	Interdependency is preferred over independence.
Importance of the free market and fair-trade conditions	Mentions of keeping fair trade conditions and not giving (dis)advantages to any manufacturer of 5G equipment.
Inclusion of companies in decision making	More inclusion of companies and their interest in the decision-making process.

Table 2. Coding Scheme for Waltzian Realism

Waltzian Realism	
Code	Explanation
Common European or NATO Approach	Call for a common approach within the EU or NATO respectively
Independence over interdependence	Independence is preferred over interdependency.
Support European Economy/Companies/Manufacturers	Call to support national or European Manufacturers to support own know-how, global economic standing, etc.

The coding scheme for threat perception in Waltian Realism looks can be seen in the table below. Some codes are ordinarily scaled to distinguish in the degree of the presence of Waltian Realism.

Table 3. Coding Scheme for Waltian Realism

Waltian Realism		
Code	Subcode	Explanation
Ordinarily scaled code: Threat perception	The threat is not perceived as real	Huawei equipment is not considered a cybersecurity risk. (This code is not counting towards mentions of Waltian Realism)

	There are some doubts about the threat.	There are doubts, whether Huawei equipment could be a cybersecurity risk. (This code is not counting towards mentions of Waltian Realism)
	The threat is considered real.	Implementing Huawei equipment is considered to be a risk to national security.
Ordinarily scaled code: Influence of Threat on the Decision	The threat has some influence on the decision	A threat is used along other arguments to argue for an outcome.
	The threat has a strong influence on the decision	A threat is used as the main argument to argue for an outcome.

While there was an initial third code for "Influence of Threat on the decision" had a third category, which referred to "threat acknowledged but has no influence", but this code was not applicable within any document.

The fourth category refers to the inductive codes, which came up during the coding. These codes do not refer to the theories but highlight other issues that the actors involved are considering.

All documents will be coded in the original language. Whenever a quote from a document is quoted, the full quote will be provided in either German or Swedish together with a translation. Unless marked otherwise the translations are provided by the author of this Thesis.

4. Analysis

4.1 Sweden

4.1.1 The Swedish Outcome

The Swedish decision was initiated by the PTS, which decided that Huawei and ZTE[3] equipment should be banned from construction of the 5G network. This means that the telecommunication companies which are participating in the auction for 5G licenses have to create their plans with other manufacturers. PTS published its decision on 20. October 2020 and as a consequence was sued by Huawei for it. The *Förvaltningsrätten* of Stockholm came to a decision on 9 November 2020 in accordance with the PTS. Huawei appealed and subsequentially lost on 22 June 2021, when the court again sided with PTS and the assessment by Säkerhetspolisen[4] (SäPo):

> "[…] det [är] endast dessa myndigheter som har tillgång till de uppgifter som behövs för att bedöma om radioanvändning kan antas komma att orsaka skada för

[3] ZTE is the second largest manufacturer of 5G equipment from China and the fourth largest globally. In contrast to Huawei, which is a privately owned company, ZTE is fully owned by the Chinese state (European Parliamentary Research Service, 2020; Pongratz 2020). Since part of the worries regarding Huawei include potential collaboration of the private company with the Chinese government, which results in a different perception of the company and with Huawei being significantly more prominent in public discussion ZTE will be included to give the full picture but is not included separately in the analysis.

[4] SäPo is part of the Swedish intelligence community. The organization focuses on national security and counterespionage.

> Sveriges säkerhet och deras analys och bedömning bör därför tillmätas stor vikt.“ [Only these authorities have access to the information needed to assess whether radio use can be assumed to cause harm to Sweden's security, and their analysis and assessment should therefore be given great weight] (*Tillämpning av lagen om elektronisk kommunikation,* 22.06.2021, p. 26)

As some Huawei equipment has been included in the construction of the existing previous mobile infrastructure like 4G, which 5G is built upon, the telecommunication companies have to replace all ZTE and Huawei equipment until 1 January 2025. The PTS was able to make its decision based on LEK, which was passed into law in 2003. After the national governmental election in 2022, which resulted in a change in government from left leaning to a right leaning coalition, NLEK was passed on 18 May 2022. This law made no change to the legal basis that allowed PTS to make this decision. While none of the telecommunication companies used Huawei equipment to build their part of the 5G network, it is unclear, how much Huawei components are implemented in the 4G infrastructure. Given however, that all telecommunication companies confidently confirmed that they will be able to meet the deadline, the percentage of Chinese equipment in this part of Sweden's critical infrastructure is most likely small and declining.

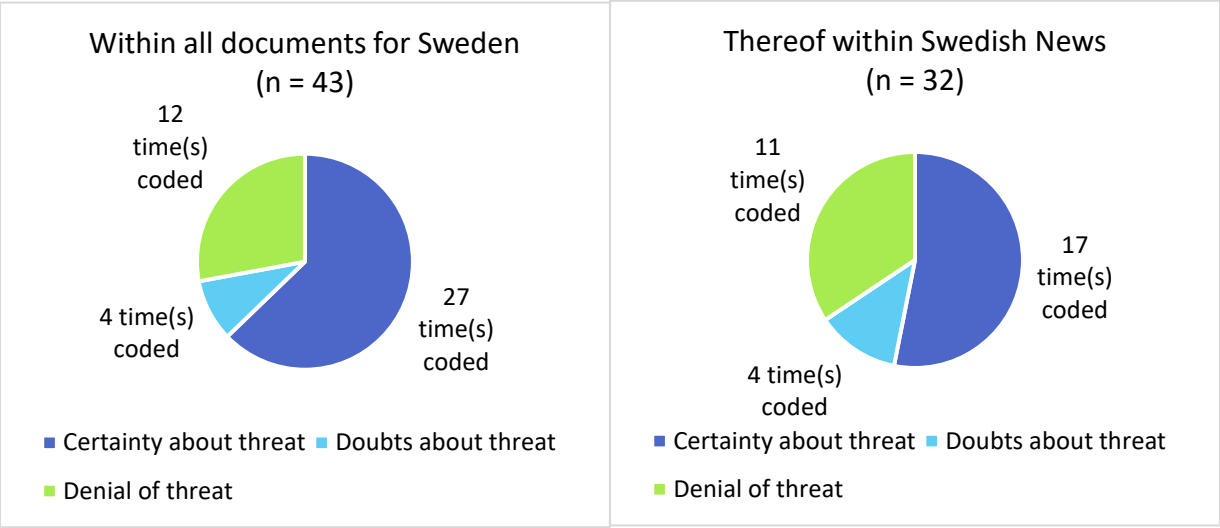
4.1.2 The development of the Swedish outcome

While this makes the decision a legal one and not a political one, it should be noted, that the Swedish Parliament passed the NLEK in 2022, which could have changed the legal frame and in turn the actions available for the PTS (Sveriges Riksdag, 2022). This was neither done nor proposed, which shows, how all eight parties in Parliament are at least somewhat in agreement. The final decision on NLEK was made by acclamation and all changes were noted in the protocol as "Partial applause", which makes it impossible to distinguish which members of parliament voted potentially against which part of the reform.

When looking for the positions of the Swedish political parties, it became apparent that this topic is not considered political. None of the parties had any entries in the electoral platforms for the national election in 2022 or statements on their website in regard to the banning of Huawei components from the Swedish 5G network. I looked for search terms like "Huawei", "5G", "Infrastruktur", "digital" or "Kina" and while the last three search terms came back with some results, none of them were a political statement or opinion relating to the topic of this Bachelor Thesis. Even when looking for short statements made on the parties' Twitter accounts with the same search terms no political positions where found. There was a similar absence of statements from the website of the Swedish government besides the government resolution to transfer the responsibility for Huawei's lawsuit to the Swedish Justice Department (Ygeman, 2021, p. 1).

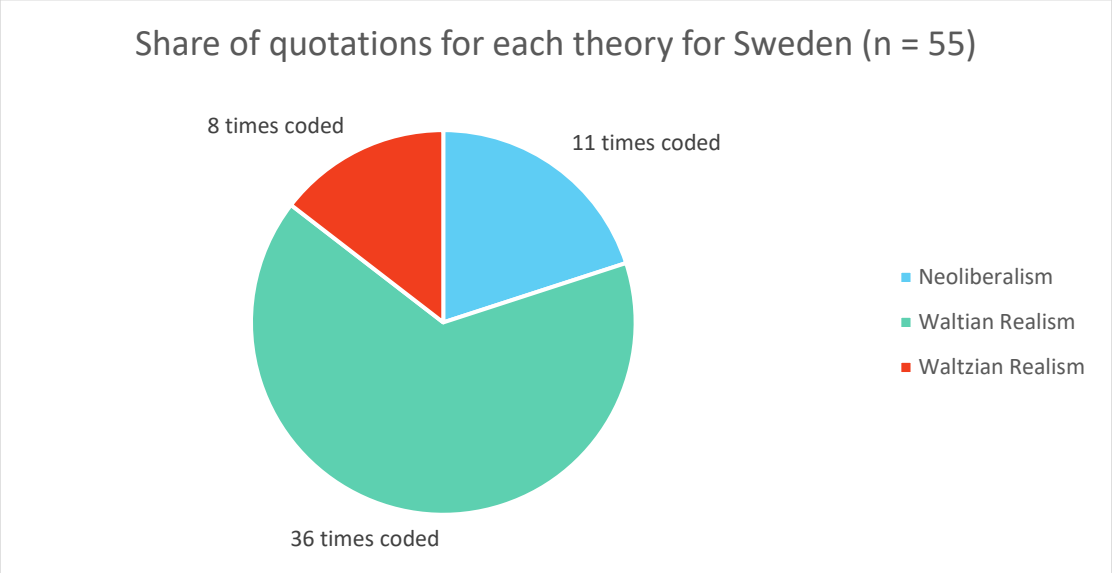
This non-politicalness can also be seen in the consistency of the position of Sweden even after their change in government following the 2022 election. Both under the left-leaning before and under a right-leaning government afterwards the position remained consistently in banning Huawei, potentially going even further and revisiting all funds that Huawei is receiving through the EU Horizon project (Slottner, 2023, p. 1).

Figure 1. Overview of the outcomes for the variation of the ordinarily scaled code "Threat perception" within Documents coded for Sweden



These codes for a threat certainty support the notion of unanimity within this part of the discussion. Whenever the code "denial of threat" was used for Swedish documents, this was done for statements directly or indirectly from Huawei. Apart from the company itself, which strongly denies the allegations, only the former Chief of Technology for the Swedish Telecommunication company Tele2, who was also called as a witness by Huawei in the court, called for trusting and not banning Huawei (Mothander, 2021).

Figure 2. Overview of prevalences for each theory related code group for Sweden



The vast majority of quotations at within Swedish documents pertain to the theory of Waltian realism. These make up 65% of the quotations coded, which pertain to each theory. Neoliberalism and Waltzian realism each made up 20% and 15% respectively. While there are some neoliberal codes and arguments made, statements of Swedish telecommunication companies like Tele2 and Tre Sverige contrast harshly with telecommunication companies in Germany or the UK. These companies stress the expenses of such a change in manufacturer as well as the time it would take to actually take out all of the Huawei components (Kelion, 2020; Skogelin, 2020). Both Tele2 and Tre Sverige agreed in interviews, that the Plans of the Swedish government are reasonable and they will adhere to them (Skogelin, 2020). The

telecommunication companies do not ask the government to approve Huawei but rather finalize the specific rules in order to proceed accordingly (Skogelin, 2020). This shows that even telecommunication companies, which could potentially benefit from more competitors and lower prices to choose for 5G equipment, do not call for the option to not restrict Huawei.

Some news reports stress the importance of the free market and competition and even the court in its decision notes that this ban of Huawei infringes on essential EU freedoms like free movement of goods (*Tillämpning av lagen om elektronisk kommunikation,* 22.06.2021, pp. 47, 56-57). In their reasoning for their decision the court explains that this infringement is proportional given that SäPo as the authority in charge has made a clear assessment of Huawei being a threat (*Tillämpning av lagen om elektronisk kommunikation,* 22.06.2021, pp. 25–27). While it is imaginable that a court could strike down a such a law under different circumstances to be in line with Swedish and EU laws, there has not been a comparable case, that turned up during the research. However, as the court explains in their decision, this is only possible if:

> "[...] endast får åberopas om det föreligger ett verkligt och tillräckligt allvarligt hot som påverkar ett grundläggande samhällsintresse" [only if there is a genuine and sufficiently serious threat affecting a fundamental interest of society] (*Tillämpning av lagen om elektronisk kommunikation,* 22.06.2021, p. 25).

If this would be a less clear threat to Sweden and more of a political choice to restrict a Chinese company, a realist decision made by the Swedish Parliament could potentially be stopped by the courts.

Sweden has a different setup than the other two countries analyzed in this Bachelor Thesis as Ericsson, the second largest manufacturer of 5G equipment globally, is Swedish (Pongratz, 2020). While it would be possible that Ericsson is a favorite to be tasked with the construction of the 5G network or parts of it, there are no mentions to support the national company over Nokia or the Chinese companies respectively. The only references made to Ericsson is trying to find a way to proceed with banning Huawei and ZTE while avoiding repercussions for Ericsson in China. Ericsson themself lobbied the Swedish government to not ban Huawei, as the company feared of missing out on the largest market for the 5G network standard (Mukherjee, 2021).

Within the Waltzian codes, these were the least prevalent codes within the documents analyzed for the Swedish decision. As Sweden was neutral at the time this is consistent with the mechanisms of Waltzian realism, which relate to alliance formation are not applicable to explain the Swedish Outcome.

Overall given the ban on using Huawei equipment to construct the 5G-infrastructure, which is argued for based on a clearly described threat, the Swedish approach matches H_3 and can be Waltian realist.

4.2 Germany

4.2.1 The German Outcome

The German reaction is split between the two governments that governed Germany within the set timeframe of this Bachelor Thesis. The first coalition between the CDU and SPD, passed the IT-Sicherheitsgesetz 2.0 in May 2021, which gives the Ministry for Domestic Affairs (Bundesministerium für Inneres und Heimat, BMI) the opportunity outlaw specific parts from being used in the construction of the critical infrastructure like the 5G network. The reason for banning a component needs to relate to the public order and security of Germany, the EU or NATO. While the BMI takes the lead, other ministries like the Ministry for Foreign Affairs or the Ministry for Digital and Transport (Ministerium für Digitales und Verkehr, BMDV). This option was not used by the CDU/SPD coalition. After the elections in September 2021 a new coalition consisting out of SPD, Bündnis 90/Die Grünen and FDP came together. In September of 2023, the BMI declared, that they wanted to use the mechanism of the IT-Sicherheitsgesetz 2.0 (Bewarder, 2023; Pollet et al., 2023). The plan is not to outright ban Huawei

equipment; the law instead differentiates between different parts of the 5G network: The core network and Radio Access Network (RAN). Within the core network no Huawei components should be used until 1 January 2026 (Bewarder, 2023; Der Spiegel, 2023). For the RAN the timeframe is set until 1 October 2026 and allows for a maximum of 25% of all installed equipment to be made by Chinese manufacturers. Regarding the RAN in sensitive areas like the capital, large cities, economic hubs, ministries, military locations and others, no Chinese equipment must be used (dpa, 2023, 2024). This approach tries to strike a balance between security concerns and providing more rural parts with 5G technology (Pollet et al., 2023). For the plan from the BMI to go forward, other ministries have to agree, which according to news reports is cause for discussions within the coalition as the FDP-lead BMDV has publicly not agreed to the plan. Once this plan is approved this means that existing installed Huawei equipment needs to be taken out (dpa, 2024).

All three telecommunication companies (Vodafone, Deutsche Telekom and Telefonica) agreed in 2021 to voluntarily exclude Huawei from their core network, however, they all have used Huawei or ZTE in their RAN. As no exact percentages are known, analysts estimate that for all three companies roughly half of their RAN is equipped with Chinese hard- and software. Their cost estimation for ripping out and replacing all components sums up to 2.5 billion Euros for all three companies. While the known plan does demand that, the companies call for financial reimbursements from the government to adhere to these regulations as well as for longer timeframes to actually be able to meet the deadlines (Husmann, 2023).

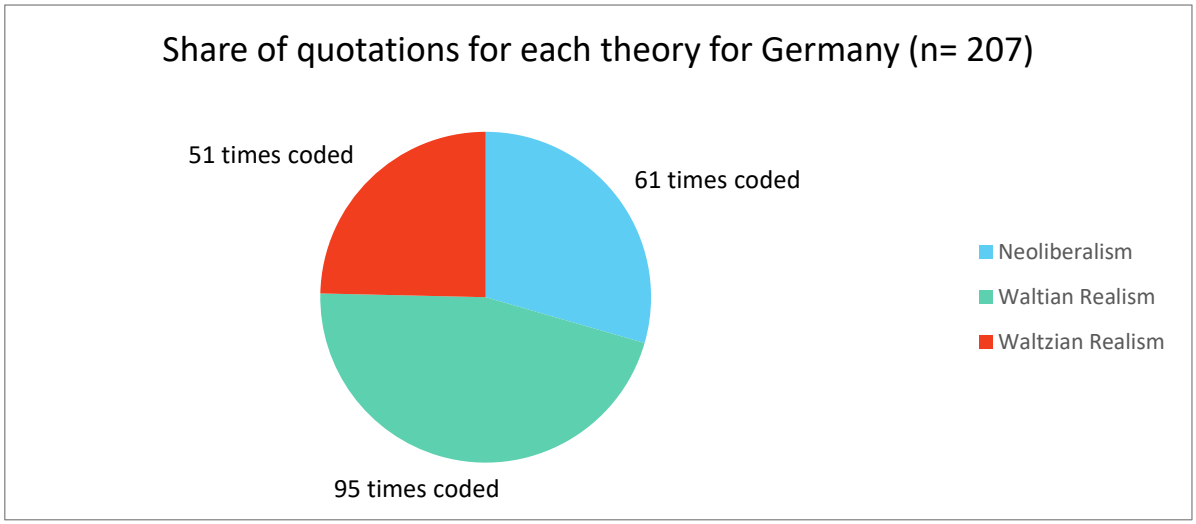
4.2.2 The development of the German outcome

The focus of this analysis will be on the first reaction of the Government compromising of CDU and SPD. Since the current Government consisting of SPD, Bündnis 90/Die Grünen and FDP (Ampel[5]-Government) has only made announcements for their change in strategy but has not been able to come to an agreement within the different ministries on the specific steps going forward, there is not a comparable body of newspaper articles or statements for the new plan. This fact would lead to a skewed potential comparison between the coding of the different timeframes.

The process of passing the IT-Sicherheitsgesetz 2.0 was accompanied by a debate of politicians from all parties in the *Bundestag* and one open call for statements from NGOs as well as some invited statements from experts. While the statements and political speeches all have a different, they all criticize the process and the time window they had for commenting on the draft for the law. Additionally, as this is amending the original IT-Sicherheitsgesetz, a lot of comments were made regarding the missing evaluation of the initial IT-Sicherheitsgesetz, which makes changing the law for the better difficult.

[5] Since the party colors red (SPD), yellow (FDP) and green (Die Grünen) match that of a traffic light, this coalition is called the German word for traffic light: Ampel

Figure 3. Overview of prevalences for each theory related code group for Germany



Within all of the documents analyzed for the German decision roughly half of all quotations, which are theory-related pertain to Waltian Realism. Within the debate in the Bundestag both speakers for the government and for the opposition highlight the cybersecurity risk they see in Huawei equipment. Within the statements by experts for the Committee for the Interior and Community it became apparent that there existed varying understandings of what exact threat a use of Huawei equipment could pose. While there is no public proof, that Huawei equipment could include a kill-switch[6], this was one of the risks that some feared, while others saw the more realistic risk in an airgap in the encryption, which would allow adversaries to read seemingly safe messages, with little to no risk of being detected (Neumann & Chaos Computer Club, 2021, p. 153). This makes it of course difficult to come to a common approach regarding a threat when there are different understandings of what the threat could be and if it is even real. The mechanism that outlaws components is described by the law expert as inadequate to react to political risks and not merely technical ones. Excluding a manufacturer outright is only possible after repeated violations of the security requirements, which is criticized as not being an adequate response to the threat of Chinese interference in German communication (Gärditz & Rheinische Friedrich-Wilhelms-Universität Bonn [Uni Bonn], 2021, p. 115). Generally the IT-Sicherheitsgesetz was described as an "Anti-Sicherheitsgesetz" [Anti-Securitylaw] (Committee for the Interior and Community, 2021, p. 10) or "Unsicherheitsgesetz" [insecurity law] (Hagen & Die Familienunternehmer e. V., 2021, p. 309) by experts during the hearing or in their written statements. This is another indication of how the majority of experts are calling for stricter regulation to meet the threat that they see in including Huawei in constructing the German 5G network. All experts, which are not representing the telecommunication industry but rather any aspects of cyber security, call for much stricter regulation.

There were additional concerns raised, which could compromise the security of Germany's 5G network. In case Huawei was banned, the German telecommunication companies could become more vulnerable, as a limited choice in potential suppliers can lead to larger damages in case one manufacturer becomes compromised (Atug & AG KRITIS, 2021, p. 81; Neumann & Chaos Computer Club, 2021, p. 156). The same experts see a threat in including Huawei and not presenting a solution as to how including Huawei and the possibility to have a back door for Chinese intelligence can be avoided at the same time as they are calling for a vendor mix to avoid single points of failure. This highlights that there exists no solution that can be considered risk free, which might be one of the reasons that the approach Germany chose is called a "non-decision" (Krolikowski & Hall, 2023).

[6] A kill-switch in this context is a mechanism, which can fully shut down a 5G network.

In terms of Neoliberalism, the majority of occurrences for these codes come from telecommunication companies and NGOs that represent interests of companies that operate in the field of telecommunication, in which they highlight the additional costs that would arise when replacing existing Huawei equipment or excluding Huawei equipment would be an option to choose (Artz & Bitkom Bundesverband, 2021; Nolte & vatm e.V., 2021). Such arguments are not cited by politicians in their speeches in either Bundesrat or in the Committee for the Interior and Community, although similar points were made by members of the CDU/CSU Bundestag fraction in their internal discussion to find a party line ("Am Ende Einstimmig," 2020).

Throughout all parties in parliament and some of the expert opinions Waltzian codes can be found. The most prevalent for Germany is the notion of Europe acting together as one, rather than every nation having to make their own decisions. Given the general hesitancy from the German government to come to a decision, this might not only be motivated by wanting to have a stronger voice when acting together within the EU, but also not having to come to a decision and potentially bearing a responsibility if this issue is addressed at the European level. A similar argument can be made for the mechanism Germany uses.

> "Wir haben uns durchgesetzt, als es darum ging, Fragen der Sicherheitstechnik, nämlich die Zertifizierung entsprechender Komponenten, von der sehr entscheidenden Frage der politischen Vertrauenswürdigkeit von Herstellern zu trennen, damit die Wirtschaft die Rahmen-bedingungen kennt, an denen wir das messen."
> [We succeeded when it came to separating questions of security technology, namely the certification of corresponding components, from the very crucial question of the political trustworthiness of manufacturers, so that the industry knows the framework conditions against which we evaluate this.]
> (Hartmann, 2021, p. 28688)

The federal aspect did not play a role in this decision, as the Bundesrat agreed on a statement regarding the IT-Sicherheitsgesetz 2.0 but only made general comments regarding the financial pressure on Feder States and lower levels of government. The statement fully omits the paragraph in the law that could be used for banning Huawei components (Deutscher Bundesrat, 2021).

The German approach under the government of CDU and SPD does not match any of the theories, as they tried to address the threat, but fell short of actually properly limiting the potential influences of the threat. The only remaining Hypothesis introduced within this thesis is Neoliberalism, while the arguments made by members of the governing parties do not specifically mention Neoliberal notion, the implication is that this law is sufficient to address the threat, even though all experts including the one, that were tasked by the government call for stronger regulations. Staying behind these recommendations could either be rooted in Neoliberalism and leaving the decision to companies and not interfering as a state or a potential fear of repercussions such as tariffs on German exports to China.

The initial German decision thus does not fully match any of the proposed Hypothesis. Similar to the findings of Krowlinski & Hall, this shows how the German approach is essentially "non-decision" (2023, p. 171). As the threat is not accurately addressed due to what can be interpreted as Neoliberalism, the Decision of the CDU/SPD government leans towards Neoliberalism.

The plan of the Ampel government on the other hand can be considered as following a Waltian realist approach, as they have identified a threat point in implementing Huawei equipment and therefore want to outlaw it. However, since this plan is still pending the approval of the FDP-lead BMDV, the country's response at the time of writing this Bachelor Thesis does not match any of the proposed Hypothesis

4.3 Austria

4.3.1 The Austrian outcome

The Austrian outcome can be differentiated into a legal and a public part. The Austrian parliament actually transferred the recommendations detailed in the EU Toolbox for cyber security of 5G networks into national law. This was done in a larger effort to transfer EU requirements into Austrian Law with 124 pages of proposed regulation for amending 15 federal laws (Parlament Österreich, 2021e). For this all parties except for the SPÖ voted in favor of amending the Telekommunikationsgesetz (TKG), which allows for the BMLRT to declare manufacturers as "high risk", if they are highly unlikely to adhere to cybersecurity and data protection EU regulation, which is in line with the recommendations of the EU Toolbox on 5G cyber security (NIS Cooperation Group, 2020, p. 18). The BMLRT is assisted in their decision by a *Fachbeirat für Sicherheit in elektronischen Kommunikationsnetzen* [Expertcouncil for security in electronic communication network] from the agency in charge of regulation telecommunication in Austria: The *Rundfunk und Telekom Regulierungs-GmbH* (RTR). When informing the public in press releases about the process of amending the TKG no mention regarding the mechanism was made in most releases (Parlament Österreich, 2021a, 2021b, 2021c) with only one sentence in the final press release vaguely mentioning it: "Das Monitoring-System für Hochrisikozulieferer schaffe maximale Sicherheit" [The monitoring system for high risk suppliers creates maximum security.] (Parlament Österreich, 2021d). This mechanism was not used until now and there is virtually no media coverage of it passing into law. Given these circumstances, the Austrian response is still considered not banning or restricting Huawei usage.

Der Standard asked the different Austrian telecommunications companies regarding their choice of manufacturers showing that Magenta [7]uses Huawei in their RAN, Liwest uses Huawei for both their core network and their RNA while 3 relies on ZTE for both network components ("5G-Ausbau Und Huawei: So Halten Es Österreichs Sieben Netzbetreiber," 2022).

4.3.2 The development of the Austrian Outcome

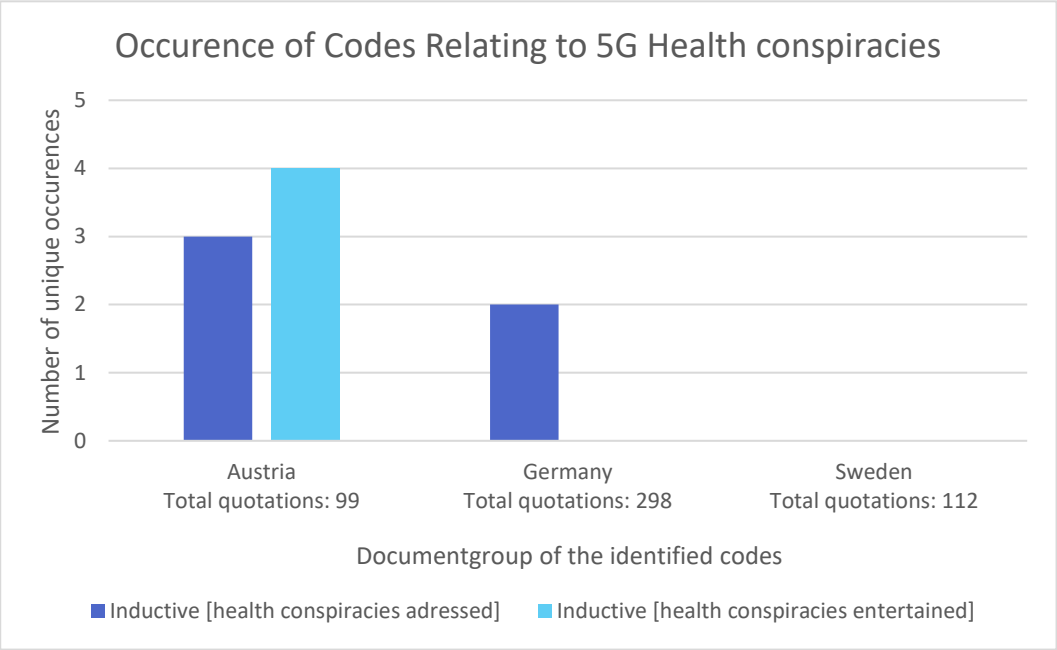
Due to the lack of a parliamentary debate, the starting point for this analysis are the parliamentary inquiries. Within the parliamentary inquiry made by the Austrian opposition, the two parliamentarians from the liberal "NEOS"-party specifically asks how the government plans to react to the reports, which point to Huawei as a security risk (Brandstätter & Hoyos-Trauttmansdorff, 2020, p. 1). The secretary of the BMLRT, which is also in charge for telecommunication, responds very broadly, noting how cyber security is important, without acknowledging the role of Huawei or ZTE or China more broadly (Köstinger, 2020, pp. 1–2). Throughout coding the statement it became apparent that the ministry in charge is not aware of specifics like e.g. which manufacturers have been used for 3G or 4G or what kind of dependency Austria has on some manufacturers (Köstinger, 2020, p. 7). The ministry instead refers to other responsibilities of the Telecommunication-Companies or the RTR (Köstinger, 2020, p. 6). The latter is the state agency in charge for - among other things - setting up the general conditions for the construction of 5G (RTR.Telekom.Post, 2020, pp. 3, 10). The only search results that include both Huawei and 5G refer to an event which had the topic of discussing cyber security and 5G and featured the CEO of Huawei Austria as a speaker (RTR.Telekom.Post, 2021, p. 1). In their white paper regarding 5G in Austria risks of 5G were mentioned but only included broad notions of security notably excluding any comment on potential foreign interference (RTR.Telekom.Post, 2020, p. 12).

Interestingly the agency focuses in more detail on their strategy to combat misinformation and conspiracy ideologies regarding 5G (RTR.Telekom.Post, 2020, p. 12). A similar occurrence of this

[7] Both Magenta and 3 are besides A1 the only telecommunication companies to provide 5G in all regions of Austria, whereas Liwest is one of four smaller telecommunication companies, which provide 5G to some regions of the country. Liwest in this case only provide 5G to the Federal State of *Oberösterreich* ("5G-Ausbau Und Huawei: So Halten Es Österreichs Sieben Netzbetreiber," 2022).

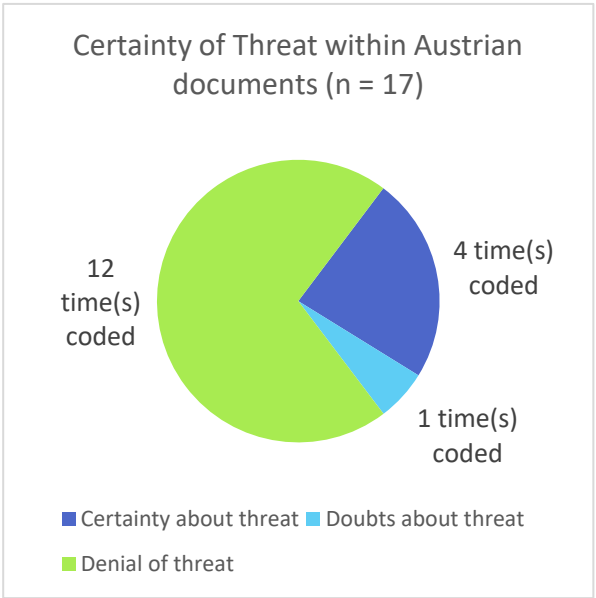
health conspiracy can be found in parliamentary inquiries for 5G, where two regarded the topic of national security and three were in regard to potential health risks with 5G. This continues in coding.

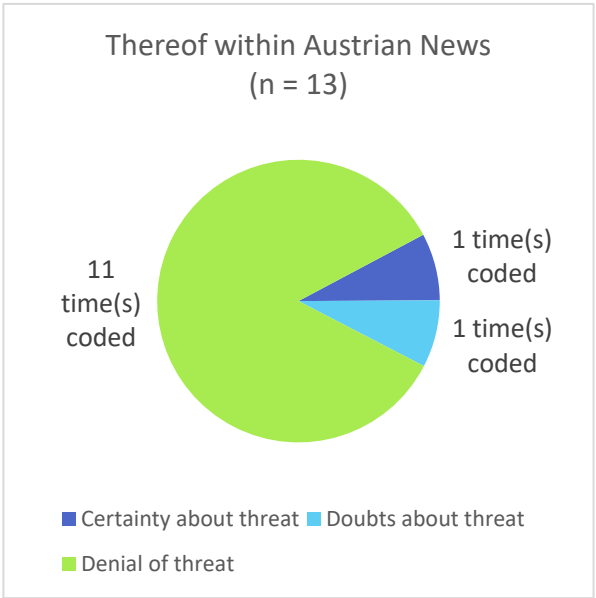
Figure 4. Overview of occurrences of the codes relating to 5G health conspiracies in all documents Sweden, German and Austria



There was no mention of 5G health conspiracies in the coded Swedish sample. Even though there are more than three times the number of quotations made for Germany in total, 5G health conspiracies were only found twice and both in one document – an inquiry on how to best combat these conspiracies. These conspiracies seem to be significantly more present in the Austrian discourse, although none of these occurrences were found in the newspaper articles analyzed for this Thesis and all parliamentary inquiries or other documents, which were only concerned with potential health risks, were not included in the analysis.

Figure 5. Overview of the outcomes for the variation of the ordinarily scaled code "Threatperception" within Documents coded for Sweden

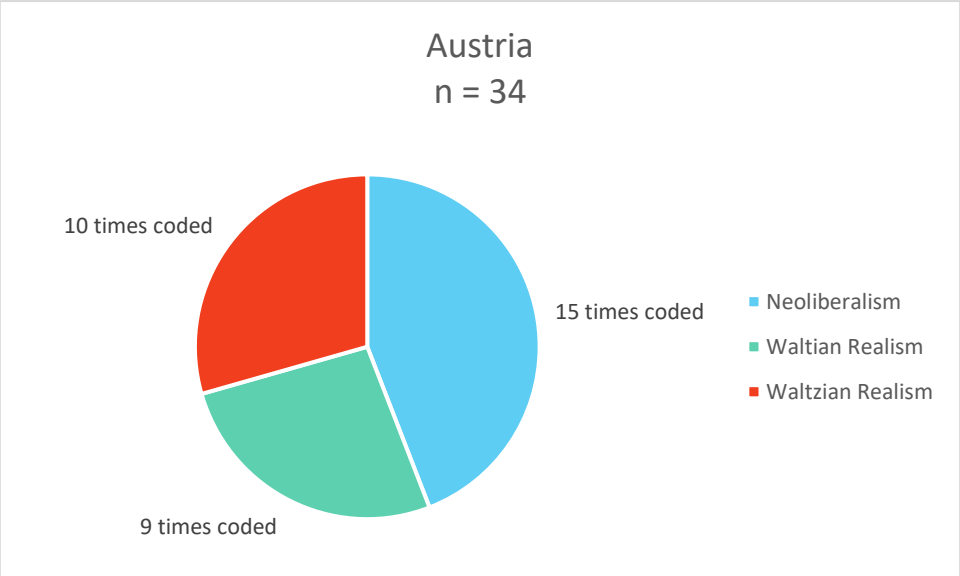




The perception of the threat in Austrian newspaper articles is dominated by denying the threat that is described by the U.S. government and the EU commission. The majority of discussions of threats were broad and omitted foreign governments or mentioned Huawei or China specifically. Whenever the concrete threat of a heightened risk or being spied upon due to constructing the 5G network with Huawei equipment is mentioned, the vast majority of the presentations of such a threat is denying it. This is most often done, with mentioning that there is no proof that would point to Huawei being a spy risk and instead highlighting how Huawei is the only manufacturer that has made its source code transparent. *Die Presse* even went as far as denying that the U.S. has any credible information that can prove that implementing Huawei technology could be a spy risk, but instead alleges that this was a made-up story to promote the U.S. 5G equipment manufacturer Cisco. This illustration also shows, how the threat is not really discussed within e.g. the Austrian Parliament, as 12 of the 18 occurrences within the documents selected for Austria came from news reports.

As the Bundesrat represents the Federal States of Austria, this discussion shows that the government of the different States supports the same notions as the National Government. There is little talk of a security risk and most of the occurrence of this topic come from far-right FPÖ politicians, which talk down this risk (Hofer, 2019; Krusche, 2019). One inductive code, which recurred a lot within the speeches of politicians during the *Aktuelle Stunde* in the Bundesrat, is the understanding that Austria should be a leader in the progress of digitalization and networks. This occurs with all five parties. While this code does not fully align with the theory of Neoliberalism, it leans in a similar direction like the passages which relate to neoliberal codes, which want to promote a fast and cheap construction of the 5G network and avoid obstacles like limiting the choice of suppliers.

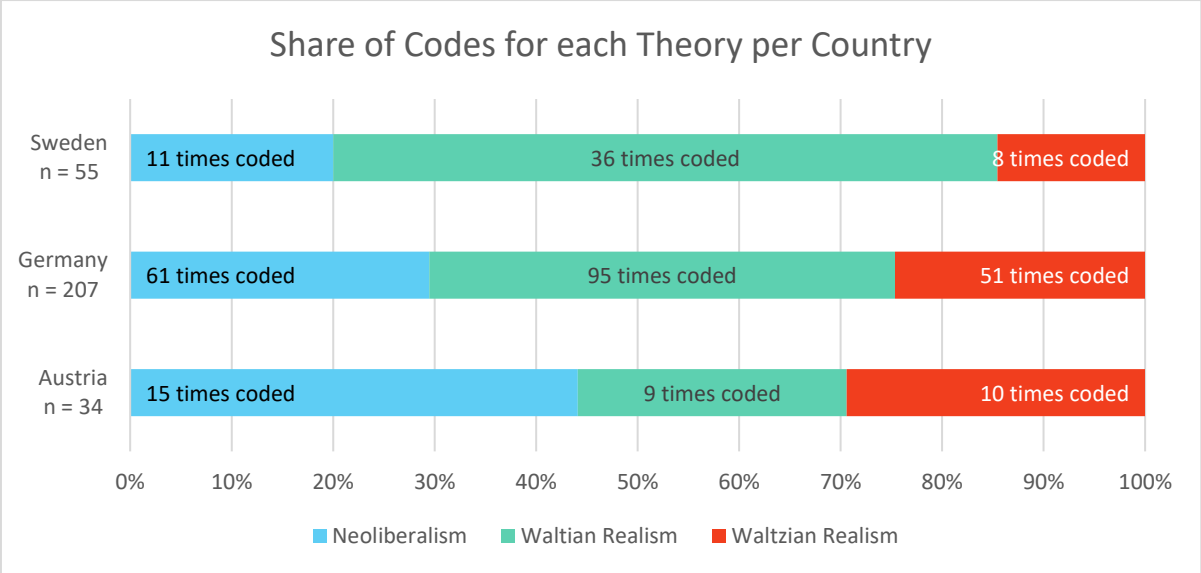
Figure 6. Overview of prevalences for each theory related code group for Austria



There were some quotations within the documents coded for Austria that pertained to the codes for Waltzian Realism. And even though Waltzian realism is only shortly behind Waltian Realism. This non-prevalence matches Austria's self-understanding of being a neutral country. Generally, there does not seem to be a Hypothesis that explains the Austrian decision. As discussed, the Waltian Realist requirement of recognizing a threat point does not apply to Austria and the absence of any regulation already falsifies both Realist Hypotheses. This leaves Neoliberalism as a possible option and while the outcome of "no regulation" matches this thesis, this is due to lots of Neoliberal arguments made, but more by an absence of calls for regulation.

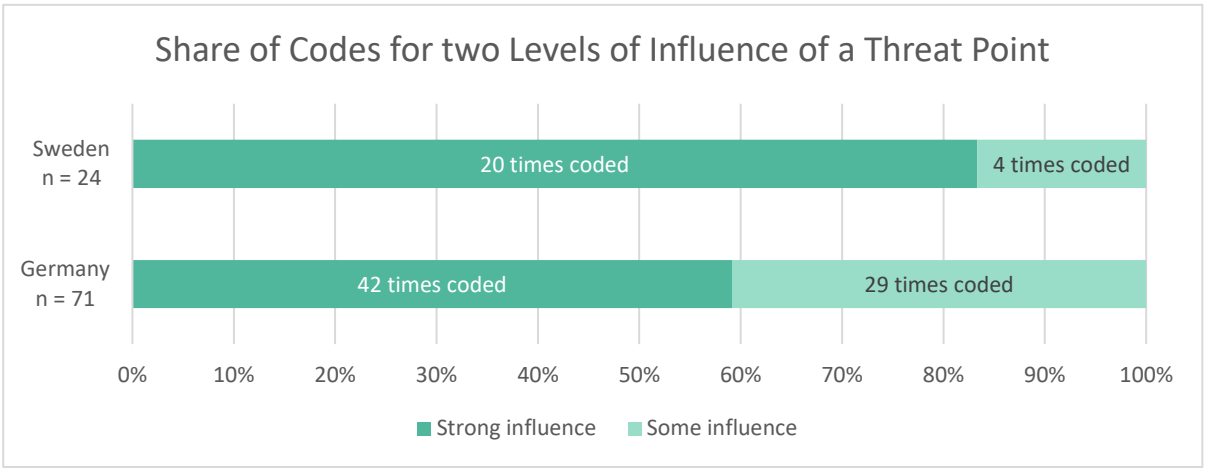
5. Discussion

Figure 7. Overview of prevalences for each theory related code group for Sweden, Germany and Austria



As can be seen in the figure above, Waltian realist codes make up the majority of theory-related codes for Sweden (36 times, 65%) and roughly half for Germany (95 times, 46%). This matches the general direction for Sweden as the country's approach can be considered Waltian realist, while only parts of the German decision can be considered Waltian realist.

Figure 8. Overview of outcomes of the ordinarily scaled code "Influence of Threat Point on the decision" for Sweden and Germany



This difference between Sweden and Germany is further supported, when considering the two levels of influence on a threat point that were coded for. The stronger influence was found in 83% of Swedish quotations compared to only 59% for the documents coded for Germany.

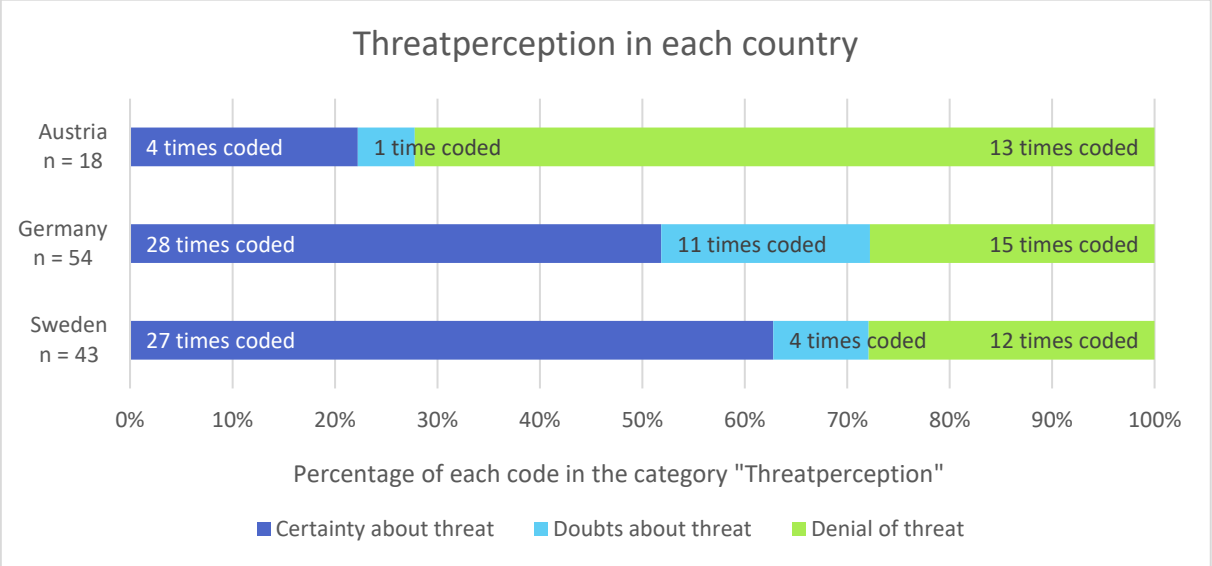
The situation for Austria is more complicated, as there are only 34 quotations pertaining to any theory, so one quotation has more impact on the percentage. Neoliberal codes are the majority for Austria (15 times, 44%) followed by Waltzian realist codes (10 times, 30%) and Waltian realist codes (9 times, 26%). Overall, the codes seem to be somewhat distributed, which matches Austria not really matching any of the Hypotheses.

5.1 Threat Certainty

The code of Threat Certainty belongs into the coding group of Waltian realist codes and its prevalence shows that there are huge differences between how the media and some politicians discuss the espionage

claims made publicly by U.S. Intelligence amongst others (Finley, 2019). While a lot of times a general call for more cybersecurity was described, only those that mention China or Huawei explicitly or in the surrounding context are included. This also means that politicians, which only vaguely mention a broad need for better cyber security regulation, are not included.

Figure 9. Overview of the outcomes for the variation of the ordinarily scaled code "Threatperception" for Austria, Germany and Sweden



There is of course a caveat in Sweden explicitly naming Huawei in their ban and court case, while the reference in Austria, Germany and the EU Toolbox is only made to companies operating in countries outside of the EU or dictatorships. A member of the German or Austrian government for example might not directly address Huawei but speak in very general terms to not strain relations with the company or China.

Since the coding for threatperception is in part counted for the Waltian code group, this graph matches the ones below since its partly the same data. However, it is showing the striking difference on how the threat is perceived in Austria compared to the other two countries. As analyzed in earlier parts of this thesis, the majority of quotations denying the threat do not come from politicians but from different newspapers.

While not visible in the graph above, the topic of threat perception is not only affecting the German decision on Huawei 5G equipment. The German non-decision continues also for the potential exclusion of Huawei for Germany's infrastructure for its' national railway company *Deutsche Bahn*. Similarly to the recent changes of outlawing Huawei for 5G, there is a disagreement within the Ampel government. With again the BMDV lead by the neoliberal FDP holding up the decision to exclude Huawei. In order to get on one page regarding the threat, the Ampel government tasked the BMDV with making threat assessments for transportation infrastructure (Fokuhl et al., 2023).

5.2 Role of neutrality

Since both Sweden and Austria, where internationally neutral at the time of these discussions, the idea of neutrality is important in this context, as neutral states are not a part of the alliance forming, which is relevant for mechanisms like bandwagoning and balancing, which are important in both Waltian and Waltzian realism. Both states understand themselves as neutral and were neutral in terms of membership with any military alliance like NATO, when they reacted to the EU Security Recommendation. Although Sweden joined the alliance in March of 2024, roughly eighteen months after Sweden submitted their application in May of 2022 (Keyton, 2024; Lee & Cook, 2024). While Sweden officially joined NATO, it is also debatable how neutral Austria still is, given their membership in the EU and in the European *Sky Shield* initiative (Foulkes, 2023). It should be noted that both countries were EU member states at

the time and part of the Common Security and Defense Policy, limiting their claim to complete neutrality (Agius & Devine, 2011, p. 266). There is not one type of neutrality that applies to all cases (Czarny, 2018, p. 13; Joenniemi, 1988, p. 54). Neutrality broadly is only considered by states, when not aligning with a major power is expected to bring more benefits than siding with one side in an emerging conflict (Joenniemi, 1988, p. 53). These benefits can range from preserving sovereignty to being able to focus more on technological or economic achievements (Joenniemi, 1988, pp. 53–54).

A study conducted after Sweden and Finland joined NATO found that 71% of Austrians surveyed consider their country safer being neutral than being a part of a military alliance like NATO (Schwarz & Urosevic, 2023, p. 13). This seems to be one of the main reasons to explain Austria outcome, as the country understands itself as safer, when it is neutral. With international tensions rising Austria does not want to take any steps, that could be interpreted as choosing a side with a government spokesperson even saying "Es geht darum niemanden auszuschließen" [This is about not excluding anyone] (Sulzbacher, 2020, p. 16). Austria not only holds an ambiguous position in regard to China but also to for example Russia. After the Russian invasion of Ukraine, a wave of international companies left the Russian market. Austria however is among the country with the highest percentage of EU companies remaining in Russia (Astrov, 2024, pp. 21–22). Austria also imports significantly more Russian gas than other EU countries. For the EU as a whole Russia only made up between 8%-9% of all imports, whereas Russian gas accounted for roughly 79% of Austrian gas imports (Astrov, 2024, pp. 17–18). This adherence to the principles of neutrality seems to be a better approach to explain the Austrian reaction instead of the theories initially presented.

In contrast, both the Swedish decision to join NATO as well as banning Huawei can be seen in a larger context of the country changing its position towards leaving behind its' neutrality. Other events that support this notion are how SäPo published in their annual security report how they consider China, Russia and Iran the most substantial threats to Sweden (Säkerhetspolisen, 2021, p. 18). The security agency described the threat as: "The threat actors cause harm to Sweden's economic prosperity and to our fundamental rights and freedoms, as well as our ability to defend ourselves, which is the basis of our democratic society." (Säkerhetspolisen, 2021, p. 19). Additionally there is a shift towards more negative views of China in the Swedish general population (Olczak, 2024, p. 13). Due to the scope of this thesis, this topic can only be looked into at a surface level, but further research is necessary whether the ban on Huawei can be considered one of the starting points of this significant change in Swedish foreign policy.

5.3 Limitations

One limitation that strongly impacts the validity of this Thesis, lies in the fact that only one person was coding the material and interpreting it. While a coding scheme can provide guidelines, each judgement on what code is applicable is done by only one person. In order to somewhat limit this a second round of coding was done to improve the consistency within the coding.

Another limitation comes from the limits on data coded, due to the scope of this Thesis news articles had to be selected as there were significantly more news articles available from the news outlets chosen available. In case a newspaper only had a few articles to the topic, all of them could be included. For other newspapers like the FAZ a significantly higher number of articles were found with the same search parameters. In order to strike a balance between strongly overrepresenting one newspaper, while still acknowledging that more articles from one newspaper can also mean that this newspaper had simply more influence on the public debate. To strike that balance, it was decided that one newspaper could not make up more than 50% of articles for any country. In order to select the best fitting articles a first selection was made based on the headline, with sorting out all articles that did not match the topic of this Thesis and a second round of trying to select articles which were written by different authors at different times.

There is another limitation that comes from the selection of Newspaper articles, which is the choice of newspapers itself. While different newspapers were chosen, to represent different political leanings, this is only an approximation as the majority of news sources are not included. This especially true for Swedish news outlets. Since neither the University of Münster nor the University of Twente provide access to any Swedish news outlets, only those, which provide free articles could be chosen. This excluded influential newspapers like *Dagens Nyheter* or *Svensk Dagbladet*.

A fourth limitation can be found in the similarity between the countries. As the countries were compared based on a most similar system most different outcome approach this was one of the core assumptions made for this Bachelor Thesis. While the three countries might be generally similar to each other, the differences between their respective approach to foreign and security policy were larger than expected and very influential, which limits the transferability of the findings on to other countries.

6. Conclusion

The answer to the research question *What are the reasons for the different reactions from Sweden, Germany and Austria towards the EU Commissions' Security Recommendation to avoid Huawei technology in constructing 5G-Infrastructure?* is three-fold.

The Swedish reaction in their full ban on Huawei equipment in 5G networks, can be explained with the help of Waltian realist theory on international relations. This stems from the clear description of implementation of Huawei equipment into 5G-infrastructure being a threat and the subsequent outlawing of using this manufacturer in Swedish 5G mobile networks. In connection with the end of Sweden joining NATO, this might not be an outlier on Swedish policy but the new direction the foreign policy of the country takes.

The German approach changed with the change of government. The first decision made by the CDU/SPD government did not fully match any of the introduced theories, however it included a mixture of a limited Waltian realist element of reaction to a threat point, which fell short of actually addressing the threat point for what can be presumed to be Neoliberal reasoning. The Ampel government proposed a new plan, which can be explained using Waltian realism. However, due to disagreements between the neoliberal FDP and the more realist party of the Greens and to a limited extent the SPD this is one of several issues in which the government cannot agree on one way forward. Therefore, the German approach to a potential ban of Huawei 5G equipment might be a symbol for the government's position to such questions in general: a mixture of Waltian Realism and Neoliberalism and long discussions with at times lacking a clear direction for the future.

The analysis for Austria showed the least reference to the codes, which were derived from the theories. The theories, which still matched the country's approach best was Neoliberalism. When considering other explanations an explanation that is more connected to country's highly regarded commitment to neutrality seems to be a lens that is useful to consider. Similarly to their approach to Russia, Austria's China approach to not limiting trade relations might not necessarily be motivated by Neoliberalism but by the country's understanding that it can and should be a bridge between the West and countries like China and Russia.

The findings of this Thesis match the available research on this topic. Especially the German approach was looked in to by academic scholars and similarly described as avoiding a clear response, while still trying to limit Huawei implementation (Krolikowski & Hall, 2023, p. 171). The other paper that looked into the countries selected, was conducted by Christie et al. who looked into 70 countries responses to U.S. pressure to ban Huawei (2024). As the detail within this paper is limited for each country, there is little overlap with this Thesis. Generally speaking, the topic of Huawei 5G bans can be seen in a larger context of EU member states slowly becoming more realist for example in regard to China or Russia (Dhaka, 2023; Jin, 2022).

Generally, there needs to be more research done into other countries of the EU and in connection to other EU reactions to China, to give a more complete picture of EU-China-Relations. Specifically, there is a gap on how the recent changes in neutrality of EU member states like Finland and Sweden influences EU decision making.

In terms of recommendations, this Thesis only gave limited insights into what recommendations could be derived for policymakers or other involved parties. Generally, however, it could be noted that the promotion health related conspiracies within members of parliament in Austria or conspiracies of U.S. motives for warning of a spy threat, especially prevalent in Austria, should be addressed in order to not discuss fake news, but actually work towards solving the problem at hand.

7. References

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Appendix

Annex I – Full Code Book (with examples)

Table 4. Coding Scheme for Neoliberalism (with examples)

Neoliberalism		
Code	Example	Explanation
Allow Huawei to save costs and time	"Der Wechsel zu einem anderen Netzwerkausrüster wäre ein erheblicher Aufwand" [Changing the networkmanufacturer would be a significant effort] (Sulzbacher, 2020, p.16)	Arguments that relate to the economic benefits of not banning Huawei from being an option to construct the national 5G networks.
Importance of the free market and fair trade conditions	"Vi har alltid argumenterat för konkurrens på marknaden. Ur det perspektivet är det aldrig bra att leverantörer försvinner från en marknad. " [We have always argued for competition in the market. From that perspective, it is never good that suppliers disappear from a market.] (Skogelin, 2021)	Mentions of keeping fair trade conditions and not giving (dis)advantages to any manufacturer of 5G equipment.
Inclusion of companies in decision making	"Im Gegensatz dazu lehnt Bitkom die gesetziche Festlegung Kritischer Komponenten ohne Beteiligung und frühzeitige Einbindung von Unternehmen ab. " [In contrast there to Bitkom rejects the legal definition of critical components without the participation and early involvement of companies] (Artz & Bitkom Bundesverband. 2021, p. 50)	More inclusion of companies and their interest in the decision-making process.
Interdependency over independence	"Für beide Machtblöcke wäre es besser, Handel zu treiben, anstatt Handelskriege zu führen." [It would be better for both blocs of power to trade with each other than to fight trade wars.] (Martin-Jung, 2023)	Interdependency is preferred over independence.

Table 5. Coding Scheme for Waltzian Realism (with examples)

Waltzian Realism		
Code	Example	Explanation
Common European or NATO Approach	"EU bör agera samfällt." [The EU should act as one.] (Wikström, 2020)	Call for a common approach within the EU or NATO respectively
Independence over interdependence	"Des Weiteren wäre es ein Fehler, sich technologisch erneut von China abhängig zu machen." [Furthermore, it would be a mistake to become dependent on China for technology]. (Martin-Jung, 2023)	Independence is preferred over interdependency.
Support European Economy/Companies/Manufacturers	"Gleichzeitig stärken wir die digitale Souveränität Europas, in dem wir vor allem auf europäische Anbieter von IT-Instrastruktur setzen. Das sichert unsere Handlungsfähigkeit und unsere Jobs." [At the same time, we are strengthening Europe's digital sovereignty by using mostly European companies for IT-Infrastructure. This keeps our ability to act and our jobs.] (Matschie, 2020, p.28692)	Call to support national or European Manufacturers to support own know-how, global economic standing, etc.

Table 6. Coding Scheme for Waltian Realism (with examples)

Waltian Realism			
Code	Subcode	Example	Explanation
Ordinarily scaled code: Threat perception	The threat is not perceived as real	"[Die] ‚Smoking Gun' sei in Wahrheit keine solche. Ein hoher deutscher Regierungsbeamter sprach gar von „Propaganda'." [The smoking gun does not exist. A high-ranking German member of government spoke of 'Propaganda'] (Mascolo & Flade, 2020, p.15)	Huawei equipment is not considered a cybersecurity risk. (This code is not counting towards mentions of Waltian Realism)
	There are some doubts about the threat.	"Och sanningen är att det inte går att säga om kinesiska regimen har större möjlighet att utnyttja tekniken för sina syften för att det är Huawei som har tillverkat den." [And the truth is, there's no telling whether the Chinese regime is more likely to exploit the technology for its purposes because Huawei made it.] (Wikström, 2020)	There are doubts, whether Huawei equipment could be a cybersecurity risk. (This code is not counting towards mentions of Waltian Realism)

	The threat is considered real.	"Enligt Säpo bediver Kina omfattande cyberspoinage och alle kinesiska företag måste rapportera till kinesiska myndigheter." [According to Säpo, China is engaged in extensive cyber spying and all Chinese companies must report to Chinese authorities.] (Carlén, 2022)	Implementing Huawei equipment is considered to be a risk to national security.
Ordinarily scaled code: Influence of Threat on the Decision	The threat has **some** influence on the decision	"Es geht vielmehr um konkreten Nutzen, um Wohlstand und um Innovation. Daher ver- einen wir in diesem Gesetz die sicherheitspolitischen Interessen und die wirtschaftspolitischen Interessen." [Rather, it is about concrete benefits, prosperity and innovation. That is why we are combining security policy interests and economic policy interests in this law.] (Schipanski, 2021, p.28682)	A threat is used along other arguments to argue for an outcome.
	The threat has a **strong** influence on the decision	"Das BMI muss kritische Komponenten untersagen, wenn ein Hersteller nicht vertrauenswürdig ist. Ein „kann“ reicht an dieser Stelle nicht aus, Herr Seehofer." [The BMI must prohibit critical components if a manufacturer is not trustworthy. A "can" is not enough at this point, Mr. Seehofer.] (Cotar, 2021, p.28688)	A threat is used as the main argument to argue for an outcome.

Table 7. Coding Scheme for Codes, which were not derived from a theory, but created inductively

Other		
Code	Example	Explanation
Austria as a Digital Frontier	"Es wird also jedem einleuchten, dass diese Technologie gerade für ein Hochtechnologieland wie Österreich von eminenter wirtschaftlicher Bedeutung ist" [It is obvious to everyone, that this technology is of immense economic relevance to a high-technology-country like Austria] (Krusche, 2019, p. 15)	Stressing the leading role Austria has or should take in expanding 5G

Coordination Federal/State Level	"Der Bundesrat fordert ein stärkeres gemeinsames Vorgehen von Bund und Ländern bei der Verbesserung der Abwehrfähigkeit im Bereich der Cybersicherheit" [The Bundesrat calls for a stronger joint approach of the federal government and the federal states for improving the defense ability in the realm of cyber security] (Deutscher Bundesrat, 2021, p. 2)	References made to other levels of government than the national level
Depoliticizing the issue	"Für den Netz-Roll-Out sind die Telekom-Unternehmen zuständig, weshalb denen auch die Auswahl der Netzwerkhersteller obliegt." [The telecommunication companies are in charge for the 5G rollout; therefore, they can choose the manufacturers of the network.] (Köstinger, 2020a, p.2)	Tries to portray this matter as technical and not inherently political
Fear of Repercussions	"Digitalminister Ygeman hoppas att de höga säkerhetskraven inte leder till at Kina svara genom att stänga ute Ericsson." [Digital Minister Ygeman hopes that the high security standards will not cause China to respond with banning Ericsson.] (Larssonb, 2020, p.1)	Fear of a reaction to banning Huawei, like tariffs on European companies
Health Conspiracies addressed	"Die Strahlung unter 20 Gigahertz — nur in dem Bereich funken wir — ist gut erforscht […]. Da gibt es keine Gesundheitsrisiken." [Radion below 20 gigahertz, the only spectre we are using, is well researched … There are no health risks"(Bünder, 2019, p.22)	Conspiracies like 5G causing cancer are addressed and declared false
Health Conspiracies entertained	"Über das gesundheitliche Risiko sollten wir auch nachdenken und es nicht beiseiteschieben." [We should think about the health risk and not push it away.] (Novak, 2019, p.23)	Conspiracies like 5G causing cancer are mentioned and but not debunked

Overreliance on one manufacturer	"Aus naheliegenden Gründen kommt in Kommunikationsnetzen zur Vermeidung einseitiger Abhängigkeiten eine Mischung von Komponenten unterschiedlicher Hersteller zum Einsatz. " [For apparent reasons and in order to avoid one-sided dependencies in communication networks a mixture of components from different manufacturers are used.] (Neumann & Chaos Computer Club, 2021, p. 156)	Describing the threat of becoming over reliant on one manufacturer and becoming more vulnerable to attacks as one point of failure is enough to hurt the network
US as a threat	"Der Einbau von NSA-Hintertürchen in die Produkte von Cisco ist gut dokumentiert." [The implementation of backdoors into Cisco products is well documented] (Auer, 2019)	Declaring the US to be a threat to cyber security

Annex II – Full List of Analyzed Documents:

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Austria

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