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Submarine Cables in the South China Sea:

Across-Domain and Across-Level Vulnerabilities

Đỗ Mạnh Hoàng (Hoang Do), South China Sea Institute, Diplomatic Academy of Vietnam; School of Political Science & International Studies, The University of Queensland¹

Vietnam is currently connected to five active international submarine cables, all crossing the South China Sea. This system is a part of Vietnam’s maritime connectivity network, which is utterly important to Vietnam’s national interests, specifically in terms of preserving security, developing economically, and enhancing its international standing. However, it is highly vulnerable to multiple risks, spanning across strategic, legal, and technical domains. Some of them, including ones that fall within the

“grey-zone” realm, are also faced by other Southeast Asian countries.

Using the multiple-level-of-analysis framework in international relations, this paper provides an overview of these multidomain risks—incorporating recent developments in the cable landscape and the South China Sea—and then explores Vietnam’s lines of efforts to mitigate them, with international co-operation being a key component.

The Relevance of Submarine Cables to Vietnam

Vietnam’s long-lasting national interests (Đảng Cộng sản Việt Nam 2026), as recently restated in the 14th National Party Congress, can be summarized in three points (Lê 2021), all of which could be applied to Vietnam’s submarine-cable system in the South China Sea.

First, Vietnam wants to preserve its independence, sovereignty, and territorial integrity. Vietnam’s

¹ The views expressed here are those of the author, based on publicly available sources, and do not necessarily represent the views of any institution or government. The author would like to thank his colleagues at the Institute, especially Ms. Hien Thao, as well as Dr. Charles Labrecque and Dr. Liat Ross, for their assistance and helpful comments.



Workers pull an undersea fiber-optic cable from a ship, as KDDI Corp. began an operation to lay a cable connecting Japan and Singapore. Photo by The Asahi Shimbun via Getty Images

geography requires taking the security of regional submarine cables into consideration, as Vietnam is situated along a major east-west sea line of communication in the South China Sea, linking Northeast Asia to the Indian Ocean via the Malacca Strait (Guoxing 2000). Current South China Sea disputes and competition between the big powers—leading to the growing trends of “decoupling” in technology and infrastructure, unilateralist action (especially in

legal and paramilitary domains, such as increasing live-fire military drills, new domestic laws applied to disputed maritime zones and features [South China Sea Institute 2025]), and grey-zone tactics—reinforce Vietnam’s need to protect its submarine cables.

Second, Vietnam aims to maintain a peaceful environment conducive for national economic development. In the long term, Vietnam, with a coastline of over 3,000 km, aims to become a maritime economy

and develop a more integrated approach to maritime governance, as expressed in Resolution 36-NQ/TW (October 22, 2018) on the Strategy for the Sustainable Development of Vietnam’s Marine Economy (Communist Party of Viet Nam 2018) and Resolution 139/2024/QH15 on the National Marine Spatial Plan (Kim Ahn 2025). Submarine cables are indispensable in this regard as they run through Vietnam’s waters and land on its coastlines, forming part

“Vietnam also aims to become a digital nation by 2030, with the digital economy contributing 30 percent of GDP (reaching 50 percent of GDP by 2045), with digitalization being the main driver of its modernization and industrialization.”

of its marine infrastructure and the allocation of marine resources and activities under marine spatial planning. Vietnam recorded 8 percent GDP growth in 2025, with industries related to the Blue Economy (sustainable maritime economic activities) (Vietnam Briefing n.d.) or the sea (including marine infrastructure, energy, and seabed mining) reportedly accounting for over 47–50 percent of total GDP (Vietnam News Agency 2025). Vietnam also aims to become a digital nation by 2030, with the digital economy contributing 30 percent of GDP (reaching 50 percent of GDP by 2045), with digitalization being the main driver of its modernization and industrialization (Đảng Cộng sản Việt Nam 2026). Because the vast majority of intercontinental data traffic—which could reach more than 90 percent—is transmitted through submarine cables (Mauldin 2023), secure regional submarine cables are foundational for Vietnam to achieve these economic targets.

Third, Vietnam seeks to enhance its international standing, reinforcing its image as a responsible and active stakeholder in international affairs, and promoting the rule of law, multilateralism, and peaceful dispute resolution. These priorities are clearly evident in the principles guiding its dispute management in the South China Sea (Nhan Dan Online 2025) and the Vietnam Law of the Sea

(National Assembly of the Socialist Republic of Vietnam 2012). Such principles are based on the 1982 United Nations Convention on the Law of the Sea (UNCLOS), which in turn contributes to the international legal framework that helps govern submarine cables. Additionally, Vietnam can use international forums dedicated to submarine cables, such as the International Cable Protection Committee (ICPC) or ASEAN’s working groups on cables (ASEAN ADGMIN 2026), to show its contributions to foreign affairs. Vietnam being a co-chair in the Council for Security Cooperation in the Asia Pacific (CSCAP)’s Study Group on the Safety and Security of Digital Infrastructure is also in line with this direction in Track 1.5 diplomacy.

Vulnerabilities on Multiple Fronts

This paper employs a multiple-levels-of-analysis framework, focusing on the above-state (or system), state, and below-state levels (Singer 1961), to describe the risks—both existing and potential—to Vietnam’s submarine cables in the South China Sea. Many of these risks are also shared by other countries in the region, including other Southeast Asian claimants in the South China Sea disputes.

First, at the system level, great-power competition, especially economic decoupling or “derisking,”

has brought about strategic and technical risks to cables. For smaller countries like Vietnam, this competition makes it more difficult to navigate competing technological and infrastructure ecosystems, including in the governance and development of submarine cables. For instance, the US executive branch, including the second Trump administration, has been making efforts to “disconnect” its cable network from China’s by promoting its own “Clean Network” initiative (Pompeo 2020); intervening to help US companies outbid China’s operators in cable projects like SeaMeWe-6; connecting Southeast Asia and Western Europe (Brock 2023); and introducing a new Federal Communications Commission (2025) rule to prevent cables connected to “adversaries” from landing in the US and to disqualify any cable projects related to “adversaries.” The US legislative branch is also active in this regard, with the House of Representatives introducing multiple acts related to submarine cables from 2023 to 2025, aiming to separate US cables and services from those of “foreign adversaries” (US Congress 2023; US Congress 2025). For its part, China has been allegedly tightening licensing for international cable projects to gain leverage over competitors in the maritime domain (Gross et al. 2023). Such a widening separation of US and Chinese submarine cables can generate more pressure for

smaller countries, especially those whose cables are connected to both, to choose one side over another and thus risk cable/technological “isolation” (if choosing one side and being separate from the other) and dependence (Nguyen et al. 2023).

The existing international law also creates systemic risks as the current legal framework on submarine cables is not complete. UNCLOS, often cited as the “constitution” of the oceans, does cover submarine cables and installations, with some articles granting parties the freedom/right to lay and repair cables.² However, in practice, cables are usually laid and repaired by private companies instead of states, which are the subject of UNCLOS (Davenport 2018). In addition, Vietnam’s submarine cables are transnational, running across the maritime zones of different coastal states (Bueger and Liebetrau 2023), which UNCLOS does not address. Transnational cables might require extra international coordination, possibly affecting cable protection on the ground, as Vietnamese businesses cannot perform the duty by themselves. For example, when Vietnam’s Asia Pacific Gateway cable was disrupted in 2023 (on branch S6 going to Hong Kong), the original repair plan was postponed partly due to the fact that the cable route and repair ships belonged to different operators in a variety of countries and territories (Vân Anh 2023).

2 UNCLOS contains several provisions relevant to submarine cables. Within territorial seas, coastal states may enact regulations to protect cables and regulate innocent passage. Archipelagic states are also required under Article 51(2) to permit the maintenance of cables laid by other states that pass through their waters. Within the exclusive economic zone (EEZ), coastal states are not explicitly obligated to protect cables, but states laying cables must comply with applicable coastal-state laws and regulations. Article 58 further affirms the freedom of all states to lay, operate, and maintain submarine cables in the EEZ. On the continental shelf, coastal states may not impede the maintenance of existing cables while conducting resource exploration. On the high seas, states must exercise “due regard” for cables already in place and avoid actions that would hinder their repair. Finally, Article 113 requires states to adopt laws and regulations criminalizing the intentional or negligent breaking of, or injury to, submarine cables.

In terms of legal compliance, Vietnam, other South China Sea claimants, and even extra-regional countries have many challenges. Submarine-cable offences are difficult to prosecute. Coastal states have only limited jurisdiction in areas beyond their territorial sovereignty (as explained in footnote 2), where breakages can happen (54 percent of global cases in 2023 were in Exclusive Economic Zones [EEZs] [ICPC 2024]). The flag states (normally countries where the ships are registered) can exercise that authority but are usually reluctant to do so if their own ships caused the offence (Halog et al. 2024). Some have pointed to the ICPC as an organization that can help enforce UNCLOS and protect cables, but the ICPC only provides guidance, best practices, and suggestions (ICPC 2014), and thereby cannot ensure compliance. Others have pointed to the 1884 International Convention for the Protection of Submarine Telegraph Cables, also known as the Paris Convention, as it applies to all maritime areas beyond territorial waters,³ but

there are only 36 parties to the convention, excluding Vietnam, and the convention itself is outdated.

Second, at the state level, on the strategic side, the South China Sea disputes can exacerbate risks to cables. As the disputes have become increasingly complex, naval activities have increased on the surface of the sea, raising the chances of accidents or miscalculation (Walker 2020), including scenarios in which communication channels are cut off. Under the surface, destroying critical infrastructure, such as submarine cables, has been labelled one of the grey-zone or mixed-warfare tactics (Rolander 2025). In the past few years, cable disruptions near Yemen during the Red Sea crisis (Patil and Gupta 2024), in the Baltic Sea during the Russia–Ukraine conflict (Reuters 2024), and around Taiwan (Rickards 2025) constitute examples of probable cable sabotage for political purposes, a tactic that can be replicated in the South China Sea.

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3 The 1884 Paris Convention, in Article 2, defines what can be considered an “offence” to cables outside the territorial waters of states. To prevent such offences, the convention puts forward multiple solutions, such as suggesting parties use proper safety measures when granting a concession for landing cables (Article 3); proposing the cable’s owner bear the cost of damage (Article 4); and advising vessels to avoid collisions or keep fishing nets at safe distances from cable-repairing ships (Article 5).



A Vietnamese coast guard officer looking towards a Vietnamese Coast Guard ship sailing near the area of China's oil drilling rig in disputed waters in the South China Sea, May 14, 2014. Photo by Hoang Dinh Nam/AFP via Getting Images

Additionally, grey-zone tactics can also be conducted in a less confrontational method. Reportedly, China has been tightening licensing for international cables as a way to reinforce its authority within the “nine-dash line” (Gross et al. 2023)—potentially a cause of the years-long delays of some Vietnam-linked projects, such as the Southeast Asia–Japan 2 and the Asia Direct Cable routes.

On the legal side, the different domestic regulations of coastal states can hinder cable connectivity. International law does not have a universal definition of “critical infrastructure,” leading to a lack of universal protection. A survey concluded that among 194 actors

(193 UN members and Taiwan), 94 had not defined this concept (Weber et al. 2023). Vietnam has not officially defined which infrastructure it considers critical, but the Ministry of Construction has introduced Circular No. 06/2021/TT-BXD, which classifies the construction of multinational telecommunications lines as the highest level of importance (Vietnam Ministry of Construction 2021). Of the countries that have defined critical infrastructure, there are still roughly 5 percent that do not consider information and communications technology, including submarine cables, as critical (VietnamNews 2022).

Third, at the below-state level, from a technical perspective, Vietnamese

businesses lack the needed capacity to secure cables. Capacity obstacles to Vietnam’s cables include coordination issues with the foreign partners of cable operators (especially given all Vietnam’s cables are international and many of them are getting old) and the related lack of domestic repair services and repair dependence on foreign consortiums. These limitations were visible in the repair delay during the Asia–Africa–Europe 1 shunt case in 2022 (VietnamNews 2022) and the Intra-Asia route disruption case in 2023 (*Báo Nhân Dân điện tử* 2023). Moreover, Vietnam has also faced oversight issues, notably in the Thailand–Vietnam–Hong Kong route theft case in 2007 (when around 100 km of cable went missing) (*Báo*

Người Lao động 2007). Vietnam’s lack of surveys in the cable-designing stage was also indicated as a problem in the Asia-America Gateway route disruption case in 2014 (Tuấn Anh 2014).

Moreover, rising geopolitical tensions can make it harder for foreign businesses to co-operate with Vietnamese counterparts on cable connectivity. Several big tech companies, such as Google and Meta, have allegedly diverted their cable routes from the South China Sea due to the maritime disputes, notably with the Apricot and Bifrost cable projects (Weissberger 2023). This trend might have political implications as well, if it leads to reduced strategic interest in or attention to the South China Sea or to an implicit acknowledgement of a certain party’s maritime claims.

It is important to note that the above-mentioned threats do not

exist independently but overlap. For instance, the decoupling of submarine cables might increase if big powers increasingly politicize critical infrastructure and exploit the above-mentioned gap in the legal framework. Indirectly, scenarios of a China–US “grand bargain” in the Pacific,⁴ or a China–Philippines conflict, escalating from clashes on the ground—regardless of their likelihood—can be damaging to regional stability, in general, and cable security, in particular. Additionally, many such threats are felt not only by Vietnam, but also other Southeast Asian countries that want to upgrade their submarine cables, including Indonesia, Malaysia, the Philippines, and Singapore.

The Way Forward

The overall picture is not all gloomy, as there are several mitigating factors to the above-mentioned risks posed to Vietnam’s cable system. First, in the short term, the

impact of China–US competition on Vietnam’s cable infrastructure may be limited, as some decoupling legislation remains largely symbolic and, in several cases, has yet to be fully implemented. Other ASEAN countries, such as Indonesia, Malaysia, and Singapore—and even some US treaty allies—are pursuing co-operation projects with both big powers. For example, KT, the largest submarine-cable company in South Korea, a US ally, still maintains cable routes with China (Jeong 2022). Second, as cables become more securitized, connectivity initiatives led by “third options” (not China or the US) have emerged. For example, Australia has announced its own Cable Connectivity & Resilience Centre, and the European Union has transformed its Enhancing Security Cooperation in and with Asia (ESIWA) program into the ESIWA+ to include submarine-cable co-operation, all aiming at promoting Indo-Pacific

4 This concern is related to the Trump administration’s reference to the “Donroe Doctrine” in its 2026 National Defense Strategy and the drawing of some Indo-Pacific resources to other geopolitical hotspots, such as the Middle East.

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cable connectivity rather than decoupling. Third, there have been more efforts to commonize cable governance within ASEAN, including Malaysia’s 2024 relaxation of its cabotage law⁵ and the ASEAN Digital Masterplan 2025 (which refers to the 2019 Guidelines on Submarine Cables). At the 2025 Shangri-La Dialogue, officials from France, Japan, New Zealand, and others all spoke on the importance of undersea cables, indicating growing awareness on this front.

Regardless, Vietnam has been pursuing multiple lines of efforts in the submarine-cables domain that might help mitigate the above-mentioned risks. As discussed in the previous two meetings of the CSCAP’s Study Group on the Safety and Security of Digital Infrastructure, many efforts are similar to what other regional countries have been doing. They are

not silver bullets and do not always bring immediate results, but they reflect a long-term commitment to addressing challenges to submarine cables.

On the political-strategic side, Vietnam promotes diversification of cable partnerships in all stages of cable operation, including planning/routing and maintenance/repairing. For example, Vietnam launched a plan for its sixth international cable route in 2024 (with Singapore as both a partner and landing point), aiming for ten international cables in total by 2030 (Tạp chí Nhà nước và Lao động 2024; Lưu Quý 2025). This in-development Vietnam–Singapore project is also the first bilateral project for Vietnam that does not cut through the South China Sea, indicating Vietnam’s desire for greater domestic capacity, direct ownership, and more strategic derisking.

On the legal-governance side, Vietnam relies on international law/the rule of law to preserve its maritime interests in the South China Sea, thus indirectly warding off cable instability. For example, bilaterally, Vietnam has creatively sought delimitation, settlement, and co-operation where possible with disputing parties, which has yielded concrete results, such as the Gulf of Tonkin delimitation and shared fishing zone with China (Tréglodé 2016); the Joint Oceanographic and Marine Scientific Research Expedition in the South China Sea with the Philippines (Mangosing 2021); the delimitation of the Gulf of Thailand (Manh Dong 2009); the EEZ agreement with Indonesia (Strangio 2025); and the joint continental-shelf submission with Malaysia (Division for Ocean Affairs and the Law of the Sea, Office of Legal Affairs, United Nations 2024). Within ASEAN, Vietnam actively

5 The “cabotage” law refers to a coastal state’s regulation to restrict foreign vessels in its waters generally. In 2024, Malaysia’s Transport Ministry announced an exemption of its cabotage policy for all foreign ships engaged in the installation, maintenance and repair of submarine cables.

supports subforums like the ASEAN Defence Ministers' Meeting and ASEAN Defence Ministers' Meeting-Plus, promoting maritime confidence building, joint drills, and defence dialogues in line with international law. Vietnam also supports the full and effective implementation of the Declaration on the Conduct of Parties in the South China Sea and the negotiation of a substantive Code of Conduct that does not affect the interests of third parties (Báo Lào Cai 2023).

More directly, Vietnam promotes common cable governance and best practices. With partners, Vietnam proposed mechanisms such as the ASEAN Guidelines for Strengthening Resilience and Repair of Submarine Cables in 2019 (ASEAN TELMIN n.d.). Through CSCAP, more ideas on how to commonize ASEAN approaches to legal governance could be promoted to governmental channels. Additionally, Vietnam's state-owned cable companies have joined the ICPC (although membership

is still limited with only two Vietnamese companies), and the International Telecommunication Union recommendations regarding cables are carefully monitored and practiced by Vietnamese agencies.

Domestically, Vietnam pursues a more streamlined cable-licensing and -protection process, helping the country strengthen its own capacity, in line with its independent foreign-policy tradition. As mentioned, Vietnam has not designated submarine cables as critical infrastructure, but the construction of multinational telecommunications lines, including cables, have been classified in domestic regulations as the highest level of importance. Vietnamese Telecommunications Laws No. 41/2009/QH12 and No. 24/2023/QH15 also encourage or give "priority" to enterprises to install and operate telecom projects on the seabed (Nguyen and Do 2026). Moreover, Vietnam adopts a whole-of-government approach by involving multiple agencies in the processes of issuing

permits, and laying, maintaining, and protecting submarine cables. Primary stakeholders include the Ministry of Information and Communications, Ministry of National Defence, Ministry of Foreign Affairs, Ministry of Public Security, and Ministry of Natural Resources (Nguyen and Do 2026). In response to potential undersea-cable disruptions, Vietnam has been introducing new domestic laws, including: (i) simplifying landing procedures to make connection and repair easier (Thủy Diệu 2024); (ii) encouraging digital innovation to improve data transmission (Le My 2025); (iii) expanding the number of cable routes, partners, and landing stations; and (iv) introducing tighter legal frameworks to criminalize offences to cables and put cables among the top infrastructure priorities (Nguyen and Do 2026).

Conclusion

In conclusion, submarine cables are important to Vietnam's national interests, including

protecting territorial integrity, increasing economic development, and enhancing its international reputation. However, Vietnam's cable system in the South China Sea is susceptible to threats across the system, state, and below-state levels, stemming from strategic competition, the limits of current legal frameworks, increasingly complex maritime disputes and grey-zone tactics, as well as restrained technical capability. Many of these threats may also be perceived by other countries in the region, especially Southeast Asian claimants in the South China Sea. To help address this problem, Vietnam's current efforts include cable diversification (not just of routes and landing points but also partners and geographical directions); and governance promotion in line with the rule of law—especially with new domestic regulations and international co-operation, including with ASEAN. As many challenges faced by Vietnam are shared, the room for regional co-operation is spacious.

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