



GENERAL REPORT

DIGITAL TRADE ACCELERATION INITIATIVE

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FOREWORD

Deemah AlYahya

Secretary-General
The Digital Cooperation Organization

The DCO Digital Trade Acceleration Initiative represents a pivotal step forward in our collective journey toward a more inclusive and dynamic global digital economy. This initiative, and the comprehensive report it has produced, offers a profound understanding of the digital trade ecosystems and regulatory frameworks across our diverse Member States. Through a review of more than 2,500 official sources on digital regulation, this initiative has provided an unparalleled depth of insight into the challenges and opportunities that define the digital trade landscape.

One of the most striking findings of this report is the remarkable diversity of digital economies within the DCO Member States. From varying levels of digital infrastructure and skills to distinct regulatory approaches, this diversity reflects the unique journeys each country has undertaken in its digital transformation. Yet, within this diversity lies a powerful opportunity for collaboration. The report not only highlights the nuances of each Member State's digital ecosystem but also identifies common ground where regulatory interoperability can be achieved, paving the way for more seamless cross-border trade.

The Digital Trade Acceleration Initiative is a multifaceted effort to drive meaningful change. It includes a thorough regulatory assessment of each Member State, stakeholder interviews with government officials, and roundtable discussions that have fostered active dialogue among Member States. Additionally, the initiative has produced a guide on international cooperation in digital trade, offering practical tools for policymakers and stakeholders to navigate the complexities of the digital economy.

At the heart of this initiative is the recognition that regulatory diversity is one of the most significant challenges to digital trade. The DCO, with its diverse membership and unwavering commitment to digital cooperation, is uniquely

positioned to address this challenge. By fostering open dialogue, sharing best practices, and working toward cooperation, the DCO membership can lead by example, demonstrating how diverse regulatory approaches can coexist and even complement one another in a globalized digital economy.

The insights and recommendations presented in this report serve as a roadmap for policymakers, businesses, and stakeholders alike. They provide a clear path forward for advancing digital trade, unlocking economic opportunities, and ensuring that the benefits of the digital economy are accessible to all.

I extend my deepest gratitude to the team of experts, researchers, and stakeholders whose dedication and expertise have made this initiative possible. Their tireless efforts have not only illuminated the challenges we face but also charted a course for meaningful progress. I also thank the DCO Member States, and private sector representatives, whose contributions have enriched this report and strengthened our collective understanding of digital trade.

As we move forward, let us embrace the opportunities presented by digital transformation. Together, we can build a digital economy that fosters innovation, inclusivity, and resilience. The DCO remains committed in its mission to drive digital cooperation, and I am confident that the insights from this report will guide us toward a future where digital trade thrives, empowering individuals, businesses, and nations alike.

With great honor, I present the Digital Trade Acceleration Initiative report, a reflection of the DCO's commitment to enabling digital prosperity for all.

EXECUTIVE SUMMARY



The Initiative at a Glance

This General Report synthesizes the findings of the Digital Trade Acceleration Initiative. It provides a holistic overview of the approach and the insights of the Initiative, offering strategic recommendations to foster digital trade and cooperation among the DCO Member States.

The report first provides overarching insights and then summarizes the approach and findings of each component. Components include both analytical findings and stakeholder engagement. Analytical findings include:

1. A thorough Regulatory Assessment Report for each DCO Member State¹;
2. A Digital Trade Landscape Report aggregating the findings across the DCO membership;
3. A Guide to International Commitments on digital trade; and
4. An analysis of the digital economy across the DCO membership and the challenges faced by the private sector.

The stakeholder engagement undertaken during the Initiative includes stakeholder interviews, capturing the perspectives of government officials, and two roundtables facilitating active discussions among DCO Member States.

The various components of the Initiative, especially their interplay, reinforce the DCO's leadership role in facilitating digital cooperation among the DCO Member States and leading the way for constructive, information-based exchanges.



Analytical Findings

The analytical components deliver unprecedented and actionable insights to enhance digital trade, promote inclusive economic growth, and strengthen cooperation.

- » The Regulatory Assessment Reports revealed that DCO Member States are at different stages of their regulatory journey across various policy areas. Where DCO Member States are at a similar stage in

their regulatory journey, their diversity has translated into a range of regulatory approaches. For instance, significant diversity exists in approaches to AI regulation, with some states adopting binding guardrails, while others focus on non-binding frameworks.

- » The Digital Trade Landscape Report found that the regulatory environments across the DCO Member States are diverse at all levels, including granular regulatory design choices. The three perspectives through which domestic digital regulation affects digital trade (market access, consumer trust, and regulatory diversity) can all be addressed through cooperation.
- » The Guide to International Commitments highlighted that existing digital trade agreements contain different models of provisions for each of the 12 in-scope policy areas. Approaches typically range from non-binding recognition formulations to detailed binding requirements. The DCO Member States have entered into commitments in many, but not all, of the 12 in-scope policy areas. Their provisions follow different models in each relevant policy area.
- » The economic analysis revealed the importance of digital trade for the DCO Member States and the potential for growth and cooperation. It showed how businesses face significant regulatory complexity across borders, including cybersecurity, data protection, and consumer protection. Infrastructure challenges are also substantial, with nearly half of respondents citing high costs and slow speeds as barriers. In addition, security and compliance costs are recurring concerns across all aspects of digital trade, from authentication to payments.

¹ The covered countries are: Bangladesh, Cyprus, Djibouti, Ghana, Greece, Jordan, Kuwait, Morocco, Nigeria, Oman, Pakistan, Qatar, Rwanda, Saudi Arabia, and The Gambia.

EXECUTIVE SUMMARY



Stakeholder Engagement

The stakeholder engagement ensured that all relevant parties are informed and included in the efforts of the Initiative, increasing buy-in and opportunities for future cooperation.

- » The stakeholder interviews gathered positive feedback on the methodology and findings, especially regarding the detail and structure of the regulatory assessment reports. The reports were widely confirmed as accurate and comprehensive, with suggestions concerning technical rather than structural matters. Furthermore, targeted input for how the information can be leveraged for future cooperation was provided.
- » The Roundtables revealed that the DCO has a great opportunity and the momentum to make an extraordinary contribution to global digital trade. The DCO could become the trusted space for developing country governments to openly discuss their concerns and learn about digital trade issues, and explore ways to cooperate on these matters. The Roundtables demonstrated how the Digital Trade Acceleration Initiative delivers actionable insights and recommendations to enhance digital trade, promote inclusive economic growth, and strengthen cooperation.



The Path Forward

The DCO Member States can build on the Initiative by pursuing commitments on digital trade or by pursuing novel forms of cooperation.

- » Where DCO Member States are at different stages of their regulatory journey, the DCO can provide technical assistance in the development of regulatory frameworks.
- » Where DCO Member States have developed different regulatory approaches, the DCO can provide a platform for constructive dialogue on the objectives and effects of different regulatory design choices.
- » Where DCO Member States have developed similar regulatory approaches, mechanisms for regulatory interoperability may be established.

Finally, the Initiative can serve as a first step toward accelerating digital trade through transparency. By sharing insights, expanding the scope of research to other areas or countries, and providing technical assistance to enhance the DCO Member States' efforts in digital trade, the DCO can continue to build digital prosperity for all.

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01

**INSIGHTS AND
STRATEGIC REFLECTIONS**

INSIGHTS AND STRATEGIC REFLECTIONS



Accelerating Digital Trade through Transparency

Digital trade is the future of trade – accelerating it is as important as it is complex. This Initiative approaches the acceleration of digital trade from a policy perspective, creating a common knowledge base for the DCO Member States to cooperate on regulatory matters. To this end, it provides a structured analysis of the domestic and international regulatory environment affecting digital trade across the DCO membership, and communicates this analysis to relevant stakeholders.

The analysis begins by documenting the regulatory environment of each DCO Member State in 12 policy areas relevant to digital trade.² The 16 Regulatory Assessment Reports provide unprecedented insights into the regulatory approaches of the DCO Member States. Through a rigorous methodology, building on official sources and a structured questionnaire (see Annex), the Initiative documents the regulations affecting digital trade throughout the DCO membership.

Then, the analysis moves to the international level. First, the Digital Trade Landscape Report aggregates the findings of the Regulatory Assessment Reports. This report showcases how the DCO membership addresses the regulatory design questions that shape digital trade across the 12 policy areas. Beyond providing an overview of the differences and similarities across the DCO membership, the report analyzes three perspectives through which regulatory choices affect digital trade: Market access, consumer trust, and regulatory diversity.

Second, the Guide to International Commitments provides an overview of the options for entering commitments on digital trade. For each of the 12 policy areas, it condenses all existing commitments across the world into different models and analyzes which DCO Member States have employed each model. Then, it matches the commitments at the international level to the previous analysis of the domestic regulatory environment, outlining which commitments would be feasible for the DCO Member States based on the current state of regulation in each policy area.

Stakeholder engagement served to communicate this knowledge to the relevant players in the DCO region. Stakeholder interviews, conducted as bilateral online

meetings with government authorities, validated the findings and enhanced the insights with further information on current priorities. The roundtables provided a forum for discussion among the DCO Member States, including discussions on the strategic priorities for actionable cooperation.

Never before has digital policy been analyzed in such a structured and extensive fashion: The DCO Member States now know their regulatory environment, how it compares to their DCO peers, and which paths to cooperation can be pursued based on international benchmarks. Furthermore, the DCO Member States have a unique forum and momentum to contribute to global digital trade. The DCO is an international organization with a mandate focused on inclusive and sustainable growth of the digital economy.



Strategic Insights

The Initiative empowers the DCO Member States to acknowledge that regulatory diversity is inevitable given their varied composition and to transform this challenge into an opportunity. The DCO Member States currently stand at different stages of their regulatory journeys and pursue different regulatory approaches. However, they boast a mandate focused on digital cooperation and thus have a unique opportunity to tackle regulatory diversity. By providing trusted information and a platform for open dialogue, the DCO Member States can demonstrate how diversity can be addressed. Since governments around the world face similar trade-offs when developing their digital policy, the DCO can serve as a guiding force for digital cooperation worldwide.

The core question is: How can the DCO Member States leverage the unique information base provided by the Initiative to accelerate digital trade? One path would be to negotiate commitments in a digital trade agreement. The Initiative has provided an unprecedented information base for such a negotiation. Willing DCO Member States could therefore build on the Initiative to accelerate digital trade through such commitments. Additionally, the Initiative supports novel forms of cooperation.

² The covered policy areas are: Data Protection, Cross-Border Data Transfers, Location of Computing Facilities, Online Consumer Protection, Electronic Transactions, Trade Facilitation with Digital Means, Cybersecurity, Artificial Intelligence, Source Code, Digital Economy Taxation and Customs Duties, Electronic Payments, and SMEs and Digital Inclusion.

Engaging in Novel Forms of Digital Cooperation

The DCO Member States can consider addressing regulatory diversity in three ways, based on the level of diversity documented by this Initiative.

Where DCO Member States are at different stages of their regulatory journey, the DCO can provide technical assistance in the development of such regulatory frameworks. DCO Member States that have yet to regulate a given policy area can build on a strong foundation by learning about different approaches and experiences from their DCO peers. The DCO can provide technical assistance to its Member States that are developing their data protection, electronic transactions, and cybersecurity regimes. In addition, the DCO Member States can engage in collective learning regarding novel policy areas, such as AI regulation.

Where DCO Member States have developed different regulatory approaches, the DCO can provide a platform for constructive dialogue on the objectives and effects of different regulatory design choices. Member States may use the DCO as a platform to share their experiences, fostering informed discussions and identifying potential opportunities for collaboration. In areas such as data localization and consumer protection, the DCO Member States pursue diverse approaches. Leveraging this experience to pursue factual and open-minded dialogue can inform not only the DCO Member States but also the rest of the world.

Where DCO Member States have developed similar regulatory approaches, mechanisms for regulatory interoperability may be established. Building bridges between regulatory requirements across borders can alleviate the compliance burden for companies and thus accelerate trade. Building on areas of strong overlap, including taxation, paperless trade, and electronic payments, the DCO Member States can signal that cooperation is effective despite a varied composition.

Going Beyond the Initiative

The Initiative provides an unprecedented level of information for the DCO Member States to cooperate. Nevertheless, it can be seen as the first step on a long path toward accelerating digital trade. There are different paths through which the Initiative can be enhanced in the near future:

1. Extending the methodology to other countries:

Expanding this rigorous methodology to countries wishing to accede to the DCO would provide a strong signal of leadership on digital cooperation. Coupled with knowledge sharing, the DCO would become an attractive hub for countries aiming to lead in digital trade.

2. Conducting a detailed comparative analysis:

Building on the findings of the Initiative to provide detail on the granular differences between regulatory approaches would deepen the global understanding of digital policy.

How to Read this Report

The findings below are structured into two chapters, each covering the analytical findings and stakeholder engagement. Each chapter outlines the relevant components of the Initiative, explaining the approach and summarizing the findings of each component. Each chapter provides conclusions based on the interplay of the different components. The Annex contains the questionnaire that guided the research behind the Initiative.





02

ANALYTICAL **FINDINGS**

ANALYTICAL FINDINGS

This section outlines the insights gathered from the analytical components of the Digital Trade Acceleration Initiative: The Regulatory Assessment Reports, the Digital Trade Landscape Report, the Guide to International Commitments, and the Economic Analysis. The opening section (see above) explains how these components interact to provide a holistic view of the domestic and international design choices made by DCO Member States.



Regulatory Assessment Reports

Approach

The 16 regulatory assessment reports provide a documentation of the regulatory environment affecting digital trade in each DCO Member State.

To assess the regulatory environment of each DCO Member State, the team first identified 12 pertinent policy areas that are central to digital trade. To structure research on these policy areas, the team then developed a set of guiding questions, distilling key regulatory design choices for each policy area. The policy areas and questionnaire, which comprise the scope of the analysis, are outlined in the Questionnaire (see Annex).

To analyze the regulatory environment, the team used official sources to answer each of the regulatory design questions identified in the Questionnaire. First, the team identified the relevant government authorities and legal frameworks, creating a repository of over 2,500 official sources. Then, the team used these sources to systematically document the regulatory environment using the guiding questions. This bottom-up desk research resulted in 16 comprehensive reports, which provide the answers to the guiding questions, a summary of the relevant authorities and frameworks, and a list of pertinent official sources for each of the 12 policy areas.

Findings

This section summarizes the findings regarding the differences and similarities in the regulatory journey of DCO Member States across the 12 in-scope policy areas. The granular findings on regulatory diversity are aggregated in the section on the Digital Trade Landscape Report (see below).



Data Protection

DCO Member States are at two distinct stages in their regulatory journeys regarding data protection. Notably, 13 DCO Member States have established comprehensive data protection rules, while three DCO Member States do not currently regulate data protection.



Cross-Border Data Transfer

DCO Member States are at two different stages in their regulatory journeys regarding cross-border data transfers. Notably, 13 DCO Member States have established data transfer regimes, while three DCO Member States do not currently regulate data transfers.



Location of Computing Facilities

DCO Member States are at two distinct stages in their regulatory journeys regarding data localization. Four DCO Member States do not require any kind of data localization, while twelve DCO Member States have established some form of data localization mandate. Notably, countries that do not require data localization often refrain by choice, not because they have yet to develop rules.



Online Consumer Protection

All DCO Member States have established consumer protection rules that apply to digital transactions, reflecting a shared recognition of their importance. Regarding spam regulation, twelve DCO Member States have established rules, while four DCO Member States do not regulate spam specifically.



Regulatory Assessment Reports



Electronic Transactions

DCO Member States are at a similar stage in their regulatory journey, with one exception. One DCO Member State has yet to establish comprehensive rules for electronic transactions, presenting an opportunity for regulatory development informed by peers' practices.



Trade Facilitation with Digital Means

DCO Member States are at a similar stage in their regulatory journey regarding paperless trade. Across the DCO region, trade administration documents are available in electronic format. All DCO Member States have an operational Integrated Customs Management Systems (ICMS). Only two DCO Member States do not have an operational Single Window system.



Cybersecurity

DCO Member States are at a similar stage in their regulatory journey regarding cybersecurity, with one exception. 15 DCO Member States have adopted cybersecurity rules, while one DCO Member State has yet to establish its cybersecurity regime.



Artificial Intelligence

DCO Member States are at different stages in their regulatory journey regarding AI. Two DCO Member States have adopted binding AI guardrails. 10 DCO Member States have adopted non-binding frameworks. Four DCO Member States have not yet established frameworks for AI. This diversity reflects the nascent nature of AI regulation and a focus on developing, rather than regulating, their local AI economies.



Source Code

DCO Member States are at a similar stage in their regulatory journey regarding source code. All 16 DCO Member States have established rules related to source code protection. Two DCO Member States have enacted a source code disclosure requirement, specifically in the context of AI.



Digital Economy Taxation and Custom Duties

DCO Member States are at the same stage in their regulatory journey regarding the taxation of the digital economy, as all DCO Member States have adopted related rules. While none of the DCO Member States applies customs duties or import-related fees to digital services/products, all DCO Member States impose customs duties or import-related fees on e-commerce (goods) imports. 14 DCO Member States apply indirect taxes on digital services/products and on e-commerce imports. Two DCO Member States impose direct digital service taxes.



Electronic Payments

DCO Member States are at a similar stage in their regulatory journey regarding electronic payments. All DCO Member States have established a regime governing electronic payments, most often drawing from general payment regulations. This includes financial integrity measures and licensing requirements for the provision of electronic payments.



Digital Trade Landscape Report

Approach

The Digital Trade Landscape Report aggregates the findings of the 16 Regulatory Assessment Reports, providing a holistic view of the regulatory ecosystem across the DCO membership. Across the 12 policy areas, it outlines how many DCO Member States have adopted which regulatory design choices.

Since regulatory frameworks reflect domestic public policy priorities, trade considerations typically play a secondary role in their design. The report examines whether and how regulatory requirements may affect cross-border digital trade based on three perspectives:

1. **Market access conditions:** Digital trade can be affected by regulatory requirements that determine foreign market access, for instance by mandating localization.
2. **Consumer trust:** Digital trade can be affected by a lack of consumer trust, which may be caused by the absence of a standard regulatory requirement or a particular idiosyncrasy.
3. **Regulatory diversity:** Digital trade can be affected by diverse regulatory requirements across borders.

Findings

This section outlines the findings on regulatory diversity among DCO Member States across the 12 in-scope policy areas. Each chapter explains the regulatory design questions at hand and then delineates how the DCO Member States address each question. The analysis regarding the regulatory journey of the DCO Member States is aggregated in the section on the Regulatory Assessment Reports (see above).



Data Protection

Three regulatory design questions involving data protection can affect digital trade. First, user consent requirements can create significant regulatory diversity since companies must obtain consent differently in each market before processing data. Second, data subject rights can build consumer trust since individuals are granted control over their data. Third, registration requirements can impact market access since companies face a hurdle before they can provide services. Each will be discussed in turn.

Four DCO Member States require user consent in all instances, nine require consent but allow for alternatives, and three do not explicitly require user consent for data processing. This diversity creates asymmetrical conditions for market access.

The majority of DCO Member States provide strong data subject rights. 14 recognize the right to access personal data, while 13 grant rights to information, rectification, and deletion. The right to object exists in twelve Member States. Only eight DCO Member States provide data portability rights, which reflects the novelty of this right. Finally, two Member States have yet to recognize any of these rights.

Among DCO Member States, ten require data processors to register with a government agency before beginning operations, while six allow processing without prior registration. Where required, registration procedures vary, ranging from basic business information filings to comprehensive data processing audits.



Digital Trade Landscape Report



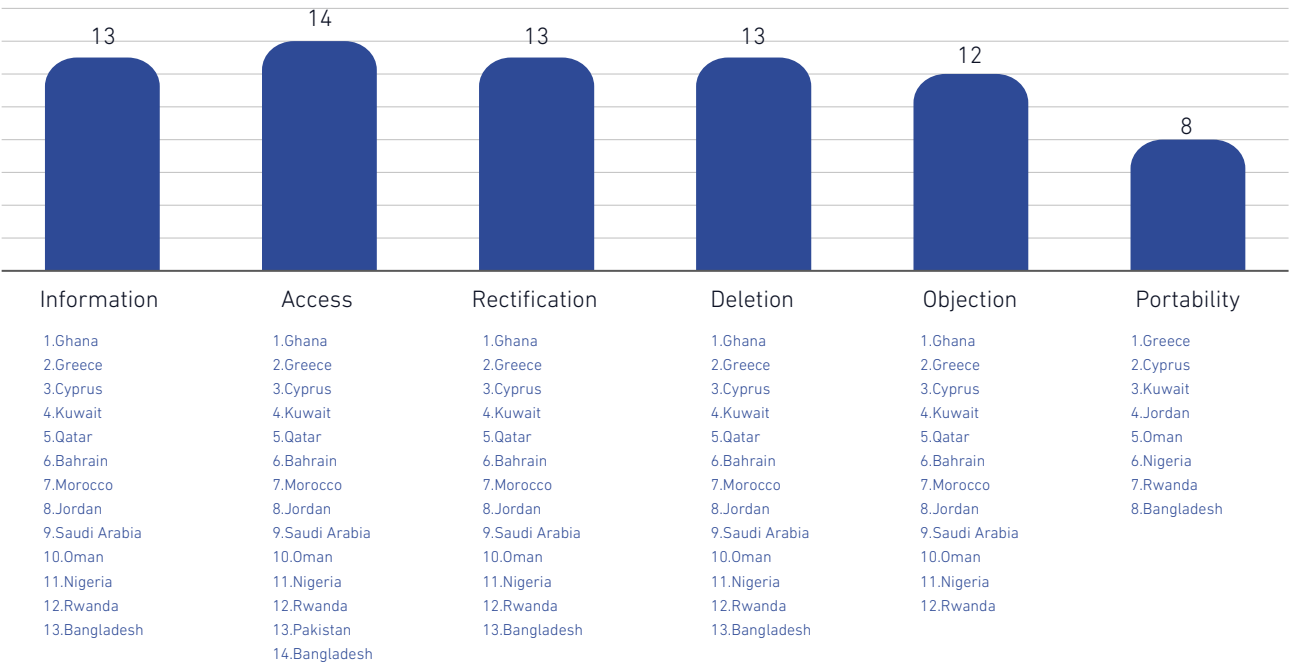
Data Protection

Figure 1: Three Categories of User Consent Requirements

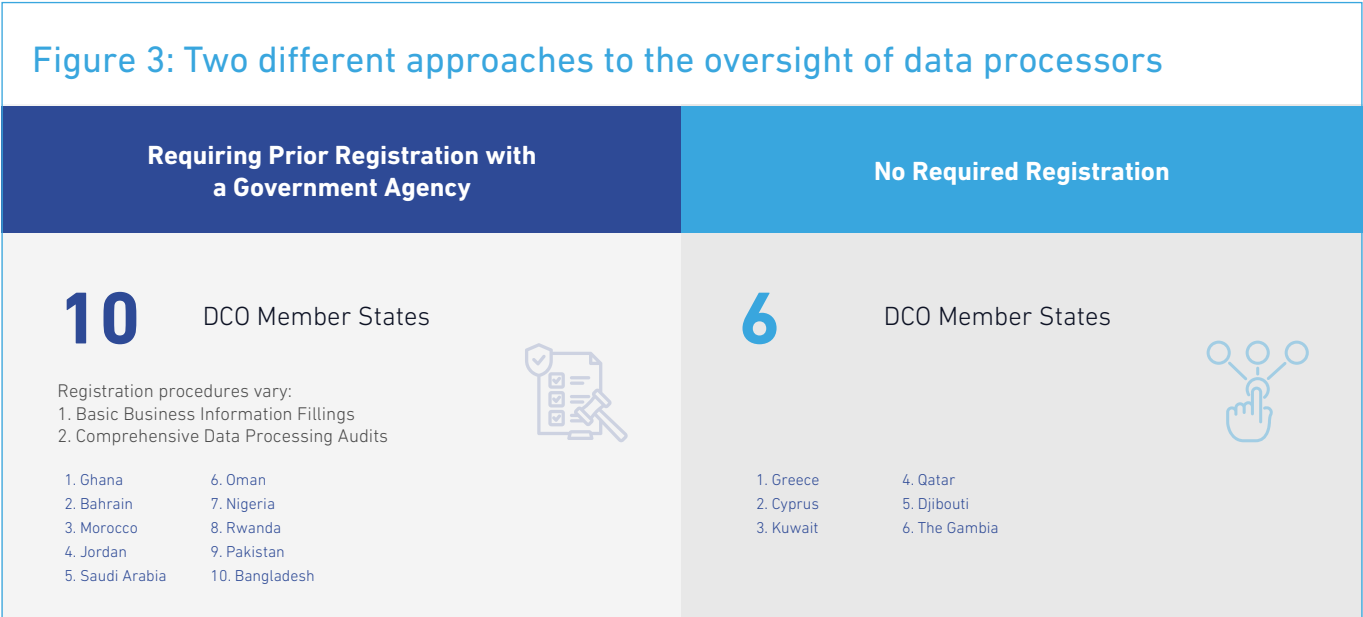
User Content is Always Required	User Content is Required with Alternatives	User Content is Never Required
<div>4</div> <div>DCO Member States</div> <div>Involves all personal information</div> <div><div>1. Ghana</div><div>2. Oman</div><div>3. Nigeria</div><div>4. Pakistan</div></div> <div></div>	<div>9</div> <div>DCO Member States</div> <div>Alternatives allowed</div> <div>a. Contractual Obligations</div> <div>b. Public Interest to Legalize Processing Personal Information</div> <div><div>1. Greece</div><div>2. Cyprus</div><div>3. Kuwait</div><div>4. Qatar</div><div>5. Bahrain</div><div>6. Morocco</div><div>7. Jordan</div><div>8. Saudi Arabia</div><div>9. Rwanda</div></div> <div></div>	<div>3</div> <div>DCO Member States</div> <div>Involves all personal information</div> <div><div>1. Djibouti</div><div>2. The Gambia</div><div>3. Bangladesh</div></div> <div></div>

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Figure 2: Data Subject Rights



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Digital Trade Landscape Report

Cross-Border Data Transfer

In the context of data transfers, two regulatory design questions can impact digital trade. First, the distinction between rules for domestic data processing and rules for cross-border data transfers can create regulatory diversity, as companies must implement different data handling processes for international operations. Second, the specific conditions required for data transfers can impact market access and increase regulatory diversity, potentially creating barriers to digital trade.

Eleven DCO Member States have distinct rules for cross-border transfers, while two apply the same rules to in-country data processing and cross-border data transfers. Three DCO Member States have not yet established their rules for data transfers.

Data transfers can be based on user consent in eleven DCO Member States. Eight DCO Member States allow transfers based on standard contractual clauses, six allow transfers based on binding corporate rules, and four allow transfers based on certification. Finally, six DCO Member States allow transfers to whitelisted countries, while five DCO Member States allow transfers based on individual government approval.





Digital Trade Landscape Report



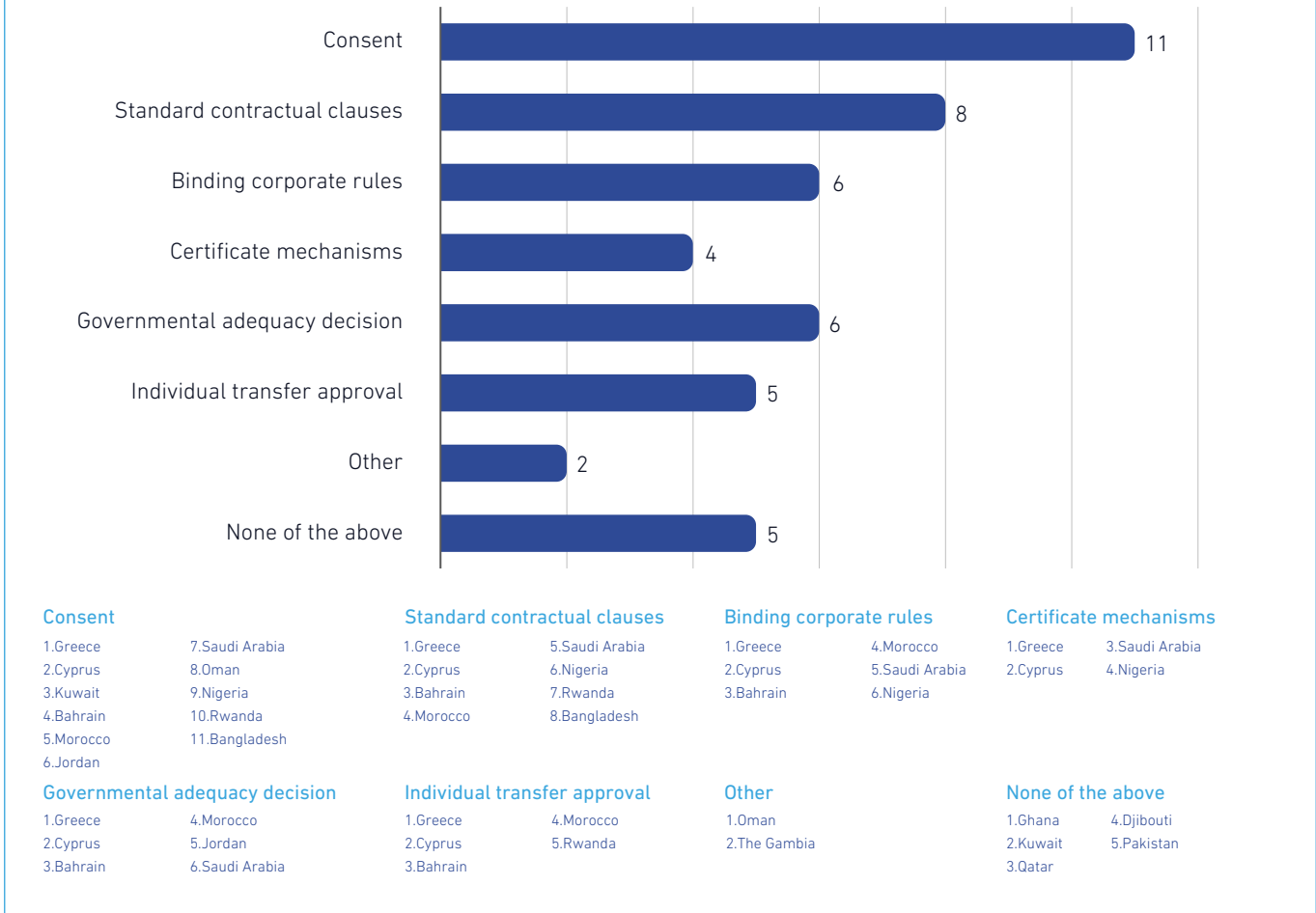
Cross-Border Data Transfer

Figure 4: Distinct Rules for Cross-Border Data Transfer

Distinct Rules	Same Rules for In-Country Data Transfer	No Distinct Rules
<div>11</div> <div>DCO Member States</div> <div><div><div>1.Greece</div><div>2.Cyprus</div><div>3.Kuwait</div><div>4.Bahrain</div><div>5.Morocco</div><div>6.Jordan</div></div><div><div>7.Saudi Arabia</div><div>8.Oman</div><div>9.Nigeria</div><div>10.Rwanda</div><div>11.Bangladesh</div></div></div> <div></div>	<div>2</div> <div>DCO Member States</div> <div><div><div>1.Ghana</div><div>2.Qatar</div></div></div> <div></div>	<div>3</div> <div>DCO Member States</div> <div><div><div>1.Djibouti</div><div>2.The Gambia</div><div>3.Pakistan</div></div></div> <div></div>

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Figure 5: Conditions for Data Transfers



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Digital Trade Landscape Report



Location of Computing Facilities

Two regulatory design questions impact how data localization affects digital trade. First, the existence and scope of data localization requirements can impact market access, potentially creating a barrier to a broad range of foreign digital service providers. Second, the specific data that must be localized can lead to regulatory diversity, as companies must navigate different rules for various data categories across DCO Member States.

Four DCO Member States do not require any kind of data localization, while twelve DCO Member States have established some form of data localization mandate. Notably, ten of the twelve DCO Member States that mandate data localization do so for a specific

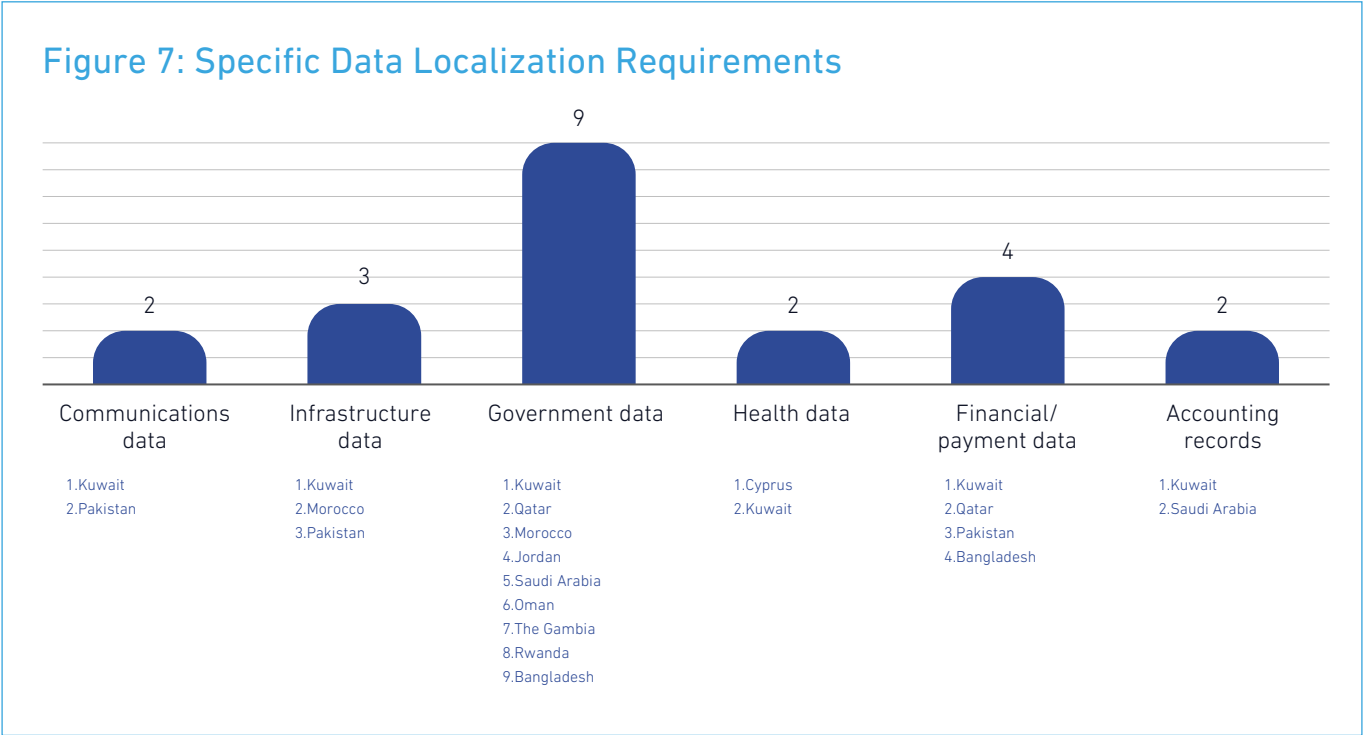
type of data. The two DCO Member States that generally require data to be stored within the national territory also impose specific localization mandates in addition.

Twelve DCO Member States establish specific data localization requirements for certain data types, creating a complex compliance landscape. Nine DCO Member States require localization of government data, four require localization of financial data, three of infrastructure data, and two of communications data, health data, and accounting records. For such specific data localization mandates, the market access issue applies again, although in a narrower fashion than for general data localization.

Figure 6: Data Localization Requirements

No Requirements		Mandates Data Localization	
<div>4</div> <div>DCO Member States</div> <div><div>1. Ghana</div><div>2. Greece</div><div>3. Bahrain</div><div>4. Djibouti</div></div> <div></div>		<div>12</div> <div>DCO Member States</div> <div><div>10 DCO Member States mandate data localization for a specific type of data</div><div>2 DCO Member States require data to be stored on national territory and add specific localization mandates on top</div></div> <div><div><div>1. Rwanda</div><div>2. Bangladesh</div><div>3. Cyprus</div><div>4. Kuwait</div></div><div><div>5. Qatar</div><div>6. Morocco</div><div>7. Jordan</div><div>8. Saudi Arabia</div></div><div><div>9. Oman</div><div>10. Nigeria</div><div>11. The Gambia</div><div>12. Pakistan</div></div></div> <div></div>	

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Digital Trade Landscape Report

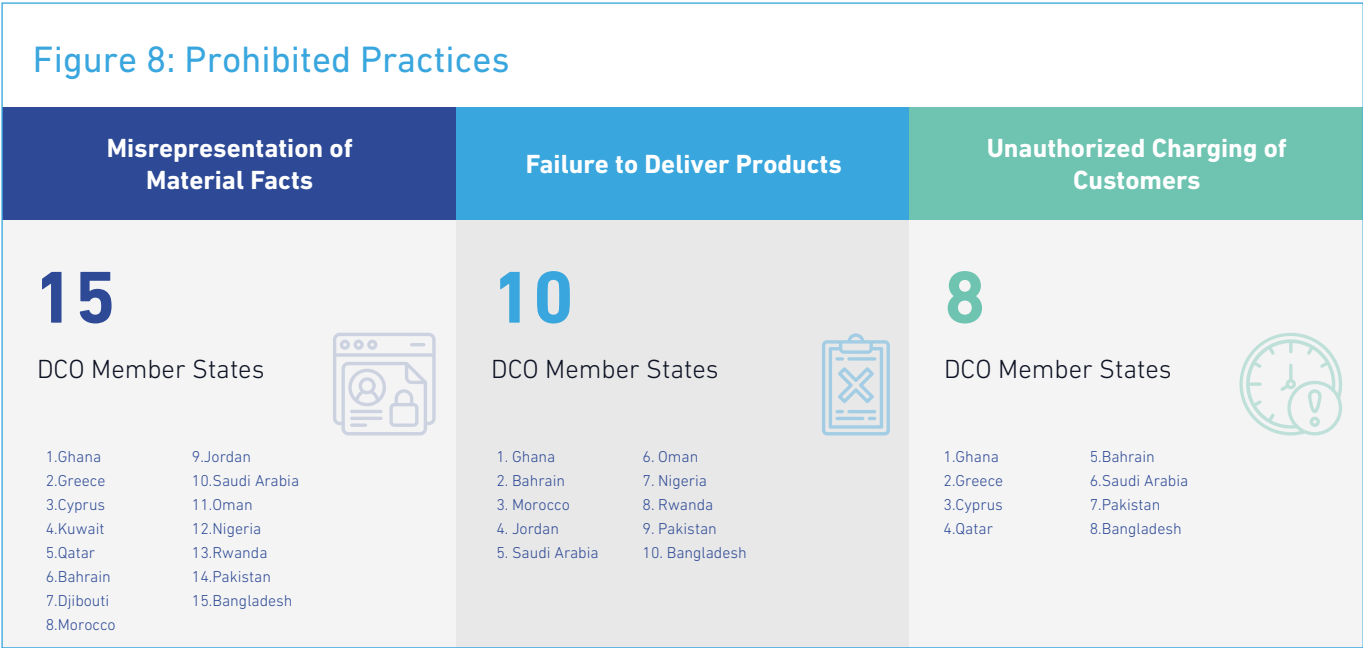


Online Consumer Protection

Two regulatory design questions can affect digital trade: the scope of practices considered violations under consumer protection rules and the conditions for the legality of spam. Both can influence consumer trust in digital transactions.

All DCO Member States prohibit certain practices to protect consumers. 15 DCO Member States prohibit the misrepresentation of material facts, 10 prohibit the failure to deliver products or provide services as promised, and eight prohibit the unauthorized charging of consumers.

Approaches to spam regulation vary significantly across the DCO region. Four DCO Member States have implemented a general prohibition, eight have established a prohibition with exceptions, and the remaining four have not yet established specific rules on spam.



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Digital Trade Landscape Report



Electronic Transactions

Three regulatory design questions regarding electronic transactions can affect digital trade. First, the recognition of electronic transactions as equivalent to paper-based transactions affects market access for digital businesses. Second, the types of electronic signatures established in the regulatory framework influence consumer trust in digital transactions. Third, the availability of governmental authentication services for private transactions bolsters consumer trust.

15 DCO Member States recognize electronic transactions as equivalent to paper-based transactions, while one does not. This widespread recognition facilitates market access for foreign providers, who can enter into contracts electronically to expand their operations in the DCO region. The overlap between the regulatory frameworks also offers a common foundation for DCO Member States to develop interoperable approaches to digital trade.

DCO Member States differ in terms of the types of electronic signatures they accept. One DCO Member State has not regulated electronic signatures. Five DCO Member States have established one type of electronic signature, six DCO Member States recognize two types, and four DCO Member States recognize three types.

12 DCO Member States offer governmental authentication services, while four do not. These services range from “digital IDs” issued by governments themselves to private solutions endorsed by governments.





Digital Trade Landscape Report



Electronic Transactions

Figure 10: Regulatory Practices for Electronic Transactions



Figure 11: Electronic Signature Types

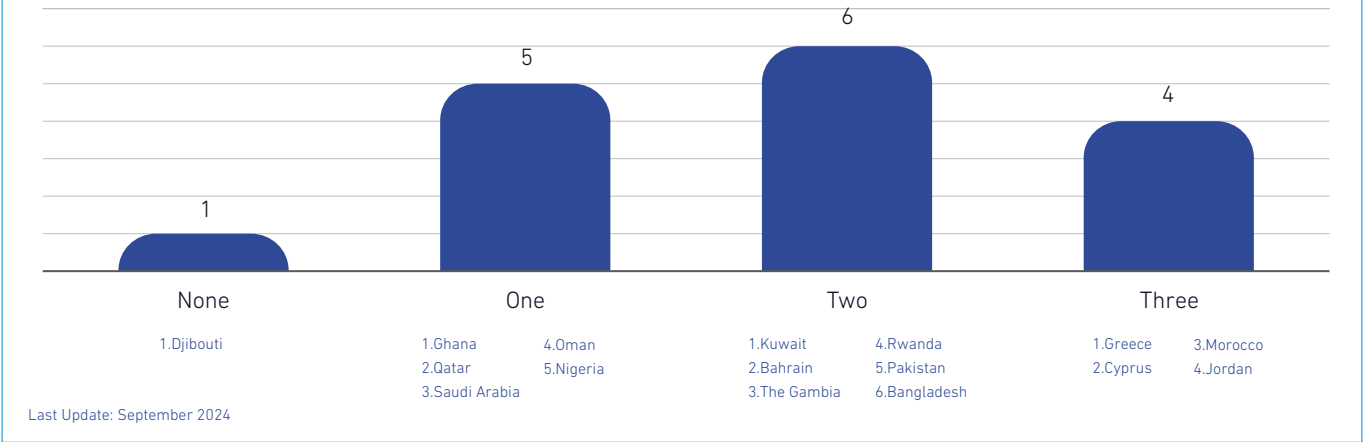


Figure 12: Governmental Authentication Services for Private Transactions



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Digital Trade Landscape Report



Trade Facilitation with Digital Means

Three regulatory design choices can facilitate digital trade, all by simplifying market access. First, the implementation of a Single Window system. Second, the implementation of an Integrated Customs Management System. Third, the availability of trade administration documents in electronic form.

14 DCO Member States have operational Single Window systems. One DCO Member State has announced plans for a Single Window, while another has not yet announced a Single Window system. The widespread establishment of Single Window systems across the DCO region indicates a strong commitment to improving market access. In addition, it presents an opportunity for DCO Member States to pursue interoperability between their Single Window systems.

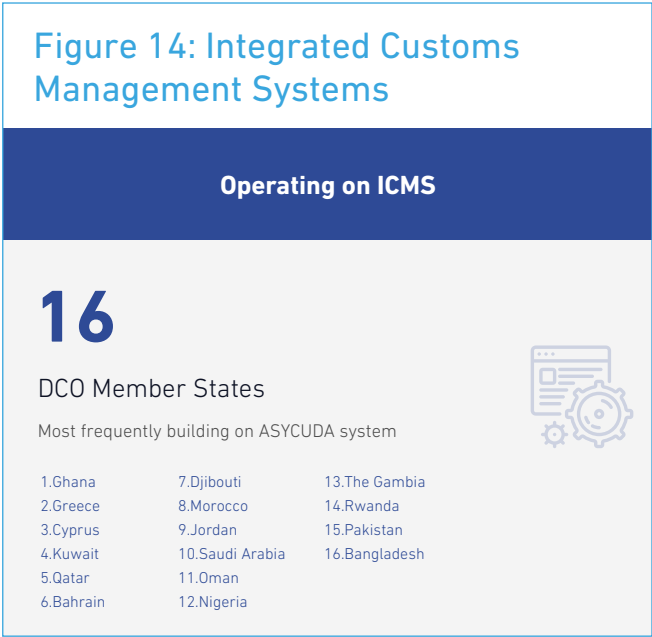
All 16 DCO Member States have operational ICMS, most frequently building on the ASYCUDA system. The unanimous adoption of ICMS signals a shared recognition of the importance of efficient customs processes in facilitating trade. ICMS simplifies and automates customs procedures, potentially reducing processing times and costs for businesses.

All 16 DCO Member States provide these documents in electronic form. This widespread adoption of electronic documentation further facilitates paperless trade, potentially reducing administrative burdens and expediting trade processes for businesses.

Figure 13: Single Window System

Operating on Single Window System	Planning to Establish Single Window System	Not Planning to Establish Single Window System
<div>14</div> <div>DCO Member States</div> <div><div><div>1.Ghana</div><div>2.Greece</div><div>3.Cyprus</div><div>4.Qatar</div><div>5.Bahrain</div><div>6.Morocco</div><div>7.Jordan</div></div><div><div>8.Saudi Arabia</div><div>9.Oman</div><div>10.Nigeria</div><div>11.The Gambia</div><div>12.Rwanda</div><div>13.Pakistan</div><div>14.Bangladesh</div></div></div> <div></div>	<div>1</div> <div>DCO Member State</div> <div><div>1.Kuwait</div></div> <div></div>	<div>1</div> <div>DCO Member State</div> <div><div>1.Djibouti</div></div> <div></div>

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Digital Trade Landscape Report



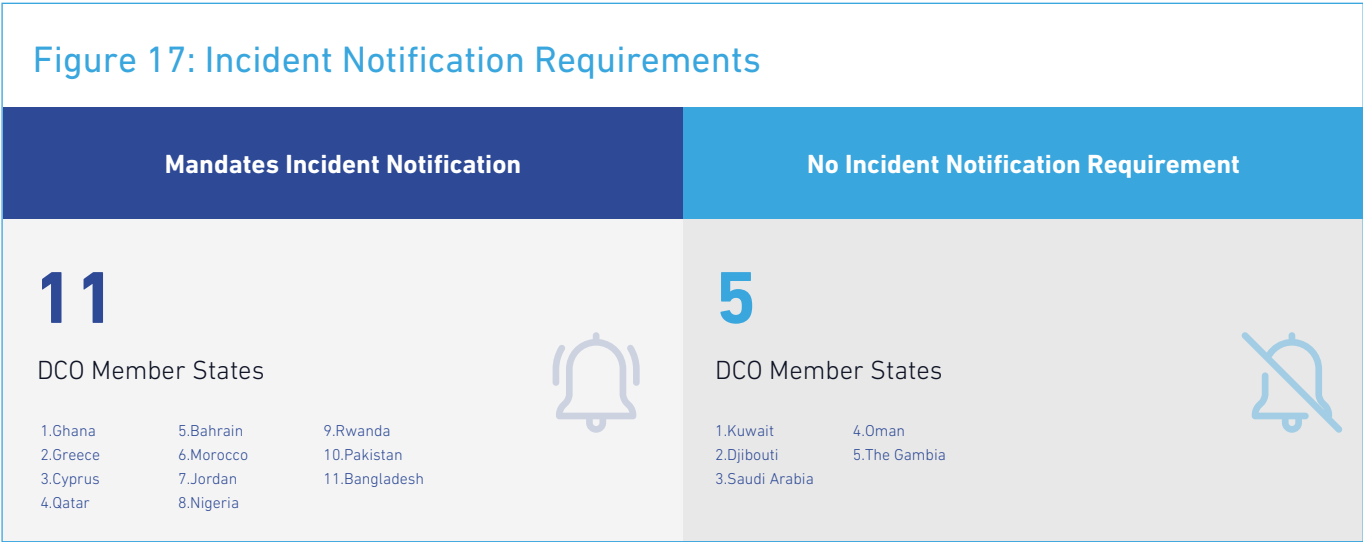
Cybersecurity

The presence of cybersecurity rules is the main factor affecting their impact on digital trade since consumer trust is jeopardized by a lack of cybersecurity rules. In terms of regulatory design, one example of how cybersecurity rules can affect digital trade is the requirement for incident notification. Such requirements can lead to considerable regulatory diversity, despite sharing the goal of transparency and a prompt reaction to security breaches.


15 DCO Member States have established a cybersecurity framework, prohibiting certain offenses in cyberspace and establishing obligations to safeguard the security of data and IT systems. The fact that DCO Member States are at a similar stage in their regulatory journey reflects the importance of cybersecurity rules.

Incident notification is required in 11 DCO Member States. By mandating transparency, incident notification requirements can increase accountability to both government agencies and users. When businesses are obligated to report security breaches, consumers can be more confident that they will be informed of any potential risks to their data or digital assets, increasing consumer trust in digital services.





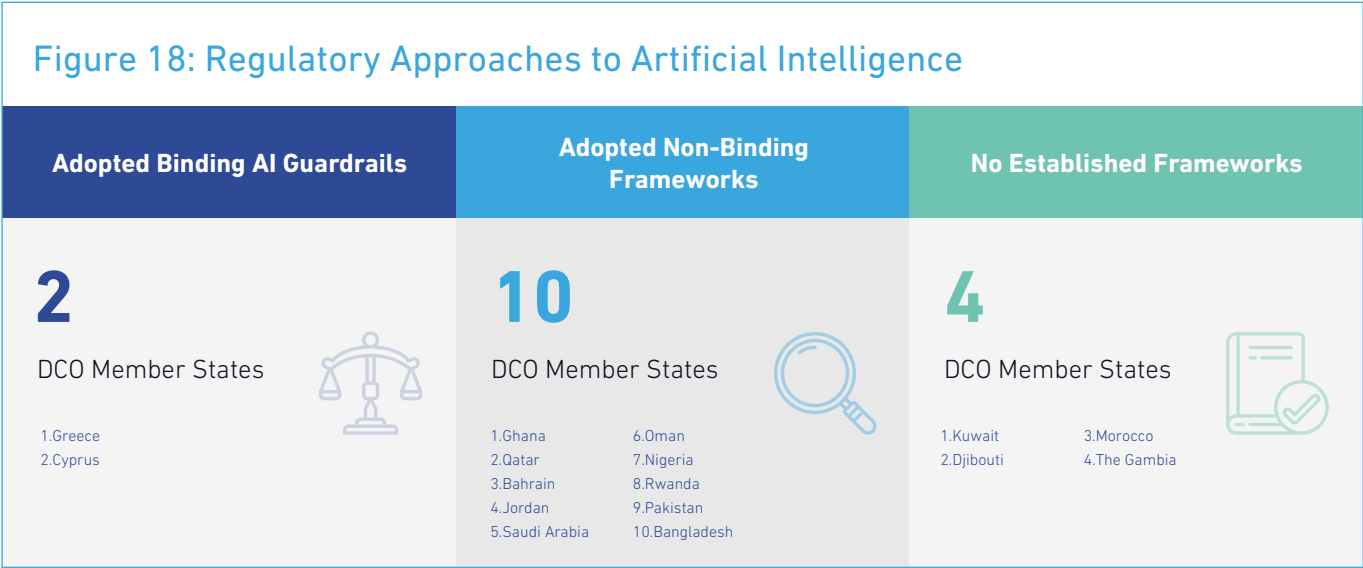
Digital Trade Landscape Report

 Artificial Intelligence

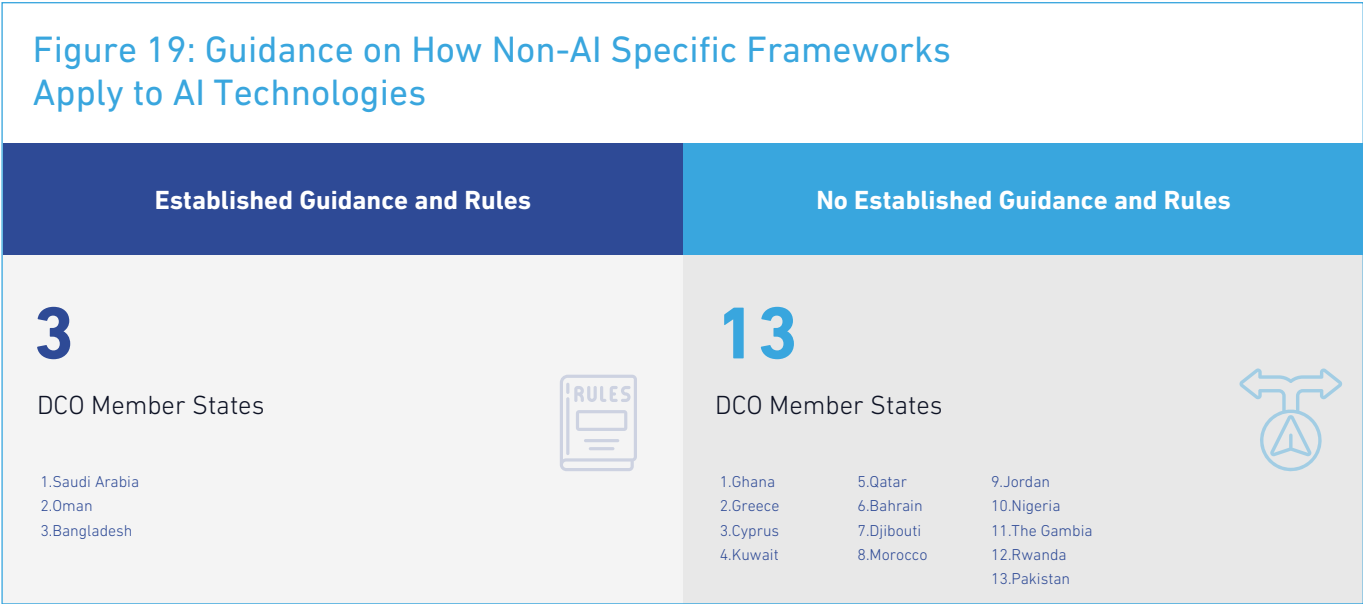
Two regulatory design questions in AI regulation can impact digital trade. First, the existence and binding nature of AI-specific frameworks can contribute to regulatory diversity. This diversity emerges both when only some countries establish rules and when various countries establish rules that target the same AI providers differently. Second, the application of existing non-AI-specific rules to AI can increase regulatory diversity since a variety of policy areas can influence AI regulation.

Two DCO Member States have implemented binding AI-specific regulations, while ten have adopted non-binding approaches, such as strategic visions, and four have not yet established any AI framework.

Three DCO Member States have released guidance on how existing non-AI-specific frameworks apply to AI technologies, while the remaining 13 Member States have not.



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Digital Trade Landscape Report



Source Code

Two key regulatory design questions regarding source code can affect digital trade: the general protection level for source code under the intellectual property (IP) framework and the existence of mandatory source code sharing requirements. Both design choices can impact market access since companies may refrain from entering markets that do not provide sufficient protection for source code or require its disclosure.

Among the 16 DCO Member States, all provide protection for source code under their IP frameworks. This unanimity creates a solid foundation for digital service providers to operate across the DCO region, as they can expect consistent protection for their intellectual property.

Two DCO Member States require mandatory source code sharing. Specifically, government authorities must be granted access to the source code of high-risk AI systems under certain conditions. This requirement can constitute a hurdle to market entry, potentially impacting companies' willingness to offer services in these markets to avoid sharing their source code. Conversely, in the other DCO Member States that do not mandate source code sharing, there is no concern about regulatory diversity or other hurdles to digital trade.

Figure 20: Regulatory Rules for Source Code Protection



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Figure 21: Source Code Sharing



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Digital Trade Landscape Report



Digital Economy Taxation and Custom Duties

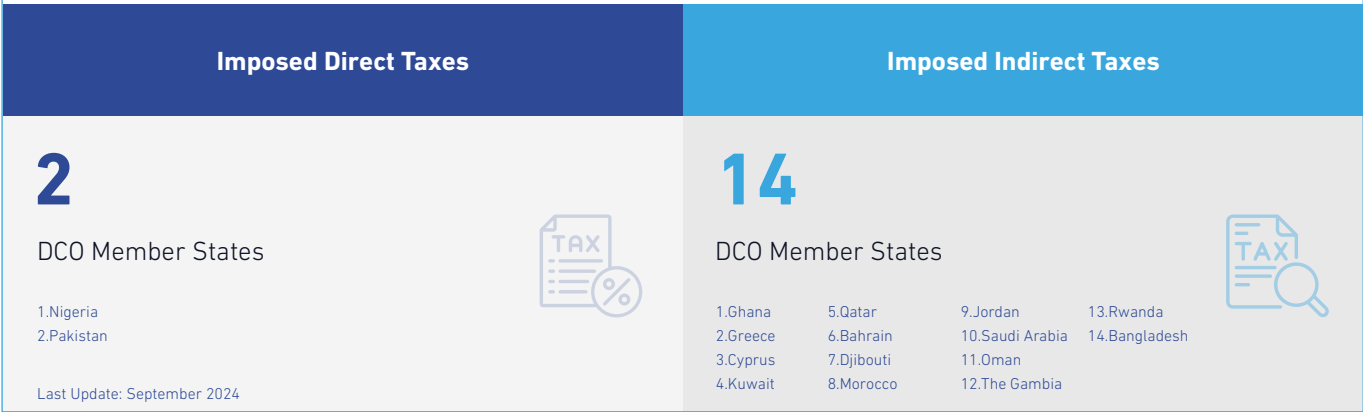
While none of the DCO Member States applies customs duties or import-related fees to digital services/products, all DCO Member States impose customs duties or import-related fees on e-commerce (goods) imports. The consistency in not imposing customs duties on digital services/products facilitates digital trade. Regarding e-commerce (goods) imports, the overlap between the different DCO Member States can be beneficial for digital trade, as regulatory diversity is not rampant. Still, customs duty regimes vary, such as in terms of value thresholds that determine whether a duty is imposed.

14 DCO Member States apply indirect taxes on digital services/products and on e-commerce imports. While this low level of regulatory diversity is beneficial for

digital trade, variations between these indirect taxes create complexity. For example, the thresholds for the application of these taxes vary significantly. Businesses must navigate different tax regimes when operating across multiple DCO markets, which can affect their market entry strategies and thus hinder digital trade.

Two DCO Member States impose direct digital service taxes. Since digital service taxes reduce profit margins, companies may refrain from entering a market that taxes revenues on digital services, opting instead for other markets with similar commercial potential that do not levy digital service taxes.

Figure 22: Taxes on Digital Services/Products and on e-Commerce Imports





Digital Trade Landscape Report



Electronic Payments

Two regulatory design questions in e-payments affect digital trade. The first concerns the implementation of financial integrity measures, which primarily impact on consumer trust. These measures include Know-Your-Customer (KYC) rules, Anti-Money Laundering (AML) regulations, and Counter-Terrorism Financing (CTF) rules for electronic payments. The second question relates to licensing requirements for entities offering electronic payment services, which affect market access.

Regarding financial integrity measures, all 16 DCO Member States have established KYC, AML, and CTF rules applicable to electronic payments.

All 16 DCO Member States require licenses for the provision of electronic payments – often relying on general payment provider licensing requirements.



Figure 23: Regulatory Rules for Electronic Payments

Established a Regime Governing Electronic Payments

16 DCO Member States

- | | | | |
|----------|------------|-----------------|---------------|
| 1.Ghana | 5.Qatar | 9.Jordan | 13.The Gambia |
| 2.Greece | 6.Bahrain | 10.Saudi Arabia | 14.Rwanda |
| 3.Cyprus | 7.Djibouti | 11.Oman | 15.Pakistan |
| 4.Kuwait | 8.Morocco | 12.Nigeria | 16.Bangladesh |



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Digital Trade Landscape Report



SMEs and Digital Inclusion

The core regulatory design question regarding SMEs and digital inclusion is what type of support mechanism the government provides. We broadly differentiate between technical assistance, financial support, and the development of digital infrastructure. All are designed to improve SMEs' market access in the digital economy.

Technical assistance is the most widespread form of support for SMEs, implemented through various channels. Nearly all DCO Member States offer some form of digital skills development program, ranging from basic digital literacy to advanced technical training in areas such as digital marketing, e-commerce operations, and (less frequently) cybersecurity. Many DCO Member States provide consulting services, often through dedicated agencies or public-private partnerships, to help SMEs navigate digital transformation, including individualized guidance on technology selection, digital strategy development, and e-commerce implementation. Several DCO Member States operate specialized centers or programs that provide comprehensive support for digital business development, combining training, mentoring, and networking opportunities.

Financial support is also frequently provided and takes several distinct forms. Many DCO Member States offer direct grants and other subsidies for digital technology adoption and e-commerce platform development, such as covering a percentage of costs for specific digital investments. Several DCO Member States have established specialized loan programs for digital transformation projects, often featuring

favorable terms such as below-market interest rates or extended repayment periods. These loans typically support investments in digital infrastructure, e-commerce platform development, or technology upgrades. A relatively small number of countries employ tax-based instruments specifically focused on SMEs to encourage digital adoption, including tax relief for digital investments or temporary moratoriums on the use of digital payment data for tax assessments.

DCO Member States employ various approaches to develop digital infrastructure and support SMEs' market access. Many governments have established national e-commerce platforms or marketplaces specifically designed for SMEs, often including integrated services such as payment processing, logistics support, and marketing tools. Some DCO Member States also offer specialized support for e-commerce exports, including assistance with international platform registration, cross-border payment solutions, and logistics. Several DCO Member States have developed or supported private entities in the development of digital platforms that connect SMEs with larger corporations or international buyers, while some are implementing digital systems for trade documentation and customs procedures. Some DCO Member States have created physical centers that provide SMEs with access to advanced digital technologies, testing facilities, and technical expertise. A number of DCO Member States are developing foundational digital infrastructure, including digital payment systems, digital identity systems, and e-government services that support SME participation in digital trade.

Figure 24: Regulatory Rules for SMEs and Digital Inclusion

Established Mechanisms to Provide Support

16

DCO Member States

- | | | | |
|-----------|-------------|------------------|----------------|
| 1. Ghana | 5. Qatar | 9. Jordan | 13. The Gambia |
| 2. Greece | 6. Bahrain | 10. Saudi Arabia | 14. Rwanda |
| 3. Cyprus | 7. Djibouti | 11. Oman | 15. Pakistan |
| 4. Kuwait | 8. Morocco | 12. Nigeria | 16. Bangladesh |

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Guide to International Commitments

Approach

The Guide to International Commitments on Digital Trade dissects all existing digital trade agreements to identify possible paths for cooperation across the DCO Member States in the 12 in-scope policy areas.

The guide covers dedicated digital economy agreements and e-commerce chapters in free trade agreements. In most cases, no DCO Member States are party to these agreements – they serve as inspiration. First, the team identified different models of provisions across various agreements, providing an example for each model and listing all the pertinent provisions in the Annex. Then, the team delineated the commitments enshrined in agreements involving the DCO Member States, elaborating on which agreements follow which model.

To match these international commitments to the DCO Member States' national policies, the team built on the findings of the Digital Trade Landscape Report (see above) to explain how the DCO Member States' national regulations align with potential international commitments.

Findings

This section provides a summary of the different models of provisions in each policy area and explains which DCO Member States have used which model in their existing agreements.



Data Protection

Data protection provisions are widespread in digital trade agreements, albeit with varying degrees of binding authority. We differentiate among three models: non-binding provisions, mixed provisions with binding and non-binding elements, and binding provisions.

The DCO Member States are involved in several agreements covering data transfers, using various models:

- » The EU-Canada Comprehensive Economic and Trade Agreement, the EU-Colombia-Peru-Ecuador Free Trade Agreement and the EU-Chile Advanced Framework Agreement rely on non-binding provisions. The EU-United Kingdom

Trade and Cooperation Agreement follows the non-binding model and additionally requires parties to inform each other about data protection measures.

- » The EU-Japan Economic Partnership Agreement and the EU-New Zealand Free Trade Agreement follow the mixed model. The WTO Agreement on Electronic Commerce also follows this model, albeit providing additional detail and a dedicated exception provision.
- » The African Continental Free Trade Agreement Digital Trade Protocol includes a binding provision.



Cross-Border Data Transfer

Data transfer provisions are common in digital trade agreements and generally follow two models: general prohibitions on data transfer restrictions and specific prohibitions on data transfer restrictions.

The DCO Member States are involved in five agreements with dedicated provisions on data transfers:

- » The African Continental Free Trade Agreement Digital Trade Protocol includes a general prohibition, albeit with certain idiosyncrasies. Specifically, it creates an Annex on Cross-Border Data Transfers, which sets out legitimate public policy objectives, how data may be used, and restrictions on sharing of data with third parties.
- » The EU-Chile Advanced Framework Agreement, the EU-New Zealand Free Trade Agreement, and the EU-United Kingdom Trade and Cooperation Agreement employ a specific prohibition. The EU-Japan Economic Partnership Agreement, which was amended in 2024 via a Data Flows and Personal Data Protection Protocol, follows this model and provides additional detail.



Guide to International Commitments



Location of Computing Facilities

Data localization provisions are common in digital trade agreements and can be categorized into three models: strict data localization prohibitions, data localization prohibitions with exceptions, and sector-specific data localization provisions.

The DCO Member States are involved in one agreement with a dedicated provision on data localization. The African Continental Free Trade Agreement Digital Trade Protocol follows the second model, establishing a prohibition with exceptions. Notably, certain EU agreements contain provisions dedicated to Cross-Border Data Transfers that also address data localization. These provisions have been discussed in the chapter on Cross-Border Data Transfers above.



Online Consumer Protection

Consumer protection provisions are widespread in digital trade agreements. Over time, four³ models have emerged: non-binding provisions, basic binding provisions, prescriptive binding provisions, and prohibitive binding provisions. Similarly, provisions dedicated to unsolicited commercial electronic messages ("spam") vary in their degree of binding authority and precision, albeit with more overlap.

Provisions regulating spam are less common but still frequent, with notable overlap. Some provisions use "shall endeavor" language, encouraging parties to adopt measures to regulate spam, promote cooperation, and adopt best practices. Provisions requiring parties to act directly are more prevalent and share two core requirements.

Regarding online consumer protection, the DCO Member States are involved in several agreements with dedicated provisions:

- » The United States-Oman Free Trade Agreement, the EU-Colombia-Peru-Ecuador Free Trade Agreement, and the EU-Japan Economic Partnership Agreement follow the non-binding model.
- » The EU-Mexico Trade Agreement follows the basic binding model.
- » The EU-Chile Advanced Framework Agreement, the EU-United Kingdom Trade and Cooperation Agreement, the EU-New Zealand Free Trade Agreement, the WTO Agreement on Electronic Commerce, and the African Continental Free Trade Agreement Digital Trade Protocol include a prohibitive binding provision, albeit with varying degrees of detail.

Regarding spam, the DCO Member States are also involved in several agreements with dedicated provisions. The EU-Chile Advanced Framework Agreement, the EU-Japan Economic Partnership Agreement, the EU-Mexico Trade Agreement, the EU-New Zealand Free Trade Agreement, the EU-United Kingdom Trade and Cooperation Agreement, the WTO Agreement on Electronic Commerce, and the African Continental Free Trade Agreement Digital Trade Protocol all follow the second model, requiring parties to act directly.



³Note that language on consumer protection is frequently included in other provisions, including on the right to regulate, cooperation, and regulatory aspects of electronic commerce. This is beyond the project scope.



Guide to International Commitments



Electronic Transactions

Provisions on electronic transactions are common in digital trade agreements. We distinguish between provisions on electronic transactions frameworks in general and provisions on electronic authentication and signatures.⁴

Provisions on electronic transactions frameworks follow three models, multiple of which can be found in the same agreement: non-binding provisions, mixed provisions, and dedicated provisions on the conclusion of electronic contracts. Provisions on electronic authentication follow three models: non-binding provisions, prohibitive binding provisions, and prescriptive binding provisions.

Regarding electronic transactions, the DCO Member States are involved in several agreements with dedicated provisions:

- » The EU-Chile Advanced Framework Agreement, the EU-Japan Economic Partnership Agreement, the EU-Mexico Trade Agreement, the EU-New Zealand Free Trade Agreement, and the EU-United Kingdom Trade and Cooperation Agreement use the model of dedicated articles on electronic contracts. They each dedicate an article to the conclusion of contracts by electronic means to eliminating the need for prior authorization.
- » The WTO Agreement on Electronic Commerce contains a dedicated provision on electronic contracts and a provision that follows the non-binding model (consistently using “endeavor” language to cover the content typical of a mixed provision).
- » The African Continental Free Trade Agreement Digital Trade Protocol contains a dedicated provision on electronic contracts and a special provision that follows the mixed model but uses binding language throughout.

Regarding electronic authentication, the DCO Member States are involved in several agreements with dedicated provisions:

- » The EU-Chile Advanced Framework Agreement, the EU-New Zealand Free Trade Agreement, the EU-Mexico Trade Agreement, and the EU-United Kingdom Trade and Cooperation Agreement use the prohibitive binding model.
- » The EU-Singapore Free Trade Agreement follows the prescriptive binding model, dedicating a provision to electronic signatures.
- » The WTO Agreement on Electronic Commerce follows the prohibitive binding model, with additional details concerning definitions.
- » The African Continental Free Trade Agreement Digital Trade Protocol contains dedicated articles on electronic trust services and electronic authentication, both following the prohibitive binding model. Notably, these provisions do not provide any exceptions.

⁴Note that this analysis focuses on dedicated provisions, disregarding general provisions on cooperation that address electronic transactions as a regulatory issue in digital trade or provisions on digital identities.



Guide to International Commitments



Trade Facilitation with Digital Means

Paperless trade provisions in digital trade agreements are widespread and differ greatly in terms of their binding authority and level of detail. We differentiate among three models: endeavor provisions, simple binding provisions, and detailed binding provisions.

The DCO Member States are involved in several agreements with provisions on paperless trade:

- » The EU-Colombia-Peru-Ecuador Free Trade Agreement and the EU-New Zealand Free Trade Agreement include an endeavor provision.
- » The African Continental Free Trade Agreement Digital Trade Protocol contains a simple binding provision.
- » The WTO Agreement on Electronic Commerce includes a detailed binding provision, with “shall” requirements for customs authorities and “shall endeavor” requirements for other government agencies. The Agreement further contains a dedicated provision on Single Windows, focusing on data exchange and system interoperability.



Cybersecurity

Cybersecurity provisions in digital trade agreements are frequent but primarily focus on cooperation rather than establishing binding commitments. We distinguish among three models: recognition provisions, provisions that encourage and promote cooperation, and provisions that require action.

The DCO Member States are involved in two agreements with provisions on cybersecurity:

- » The WTO Agreement on Electronic Commerce contains a recognition provision. In addition to the typical recognition formulation, it states that

parties shall endeavor to use, and encourage enterprises within their jurisdictions to use, risk-based cybersecurity approaches that rely on risk management best practices and consensus-based, transparent, and open standards.

- » The African Continental Free Trade Agreement Digital Trade Protocol includes a provision requiring action.



Artificial Intelligence

Provisions on artificial intelligence are rare in digital trade agreements. The novelty of this issue reflects both the importance of artificial intelligence for digital trade and governments' willingness to nurture its development and address the challenges it brings. The existing provisions can be grouped into three models, based on their level of detail and directness in fostering cooperation: short endeavor provisions, long endeavor provisions, and endeavor-and-cooperate provisions.

The DCO Member States are not currently involved in any agreements with provisions on artificial intelligence.





Guide to International Commitments



Source Code

Source code provisions in digital trade agreements are fairly common, but not yet widespread. Aiming to protect intellectual property and trade secrets, these provisions share a core prohibition against mandatory source code sharing. Variations persist, however, regarding the scope of these provisions and the exception mechanisms they provide. The DCO Member States are involved in several agreements that include typical provisions on source code:

- » The EU-Chile Advanced Framework Agreement.
- » The EU-New Zealand Free Trade Agreement.
- » The EU-Mexico Trade Agreement.
- » The EU-United Kingdom Trade and Cooperation Agreement.
- » The EU-Japan Economic Partnership Agreement.
- » The African Continental Free Trade Agreement Digital Trade Protocol.



Digital Economy Taxation and Custom Duties

Digital trade agreements often cover customs duties on electronic transmissions, rather than the taxation of the digital economy or other customs duties. The provisions follow two models. One model prohibits such customs duties, although different specifications have emerged in international commitments worldwide. The other model recognizes electronic transmissions as a provision of services that cannot be subject to customs duties.

The DCO Member States are involved in several agreements that follow the first model, namely:

- » The African Continental Free Trade Agreement Digital Trade Protocol.
- » The Canada-Jordan Free Trade Agreement.
- » The EU-Canada Comprehensive Economic and Trade Agreement.
- » The EU-Chile Advanced Framework Agreement.
- » The EU-Japan Economic Partnership Agreement.
- » The EU-New Zealand Free Trade Agreement.
- » The EU-Mexico Trade Agreement.
- » The EU-Singapore Free Trade Agreement.
- » The EU-Vietnam Free Trade Agreement.
- » The GCC-Singapore Free Trade Agreement.
- » The Singapore-Jordan Free Trade Agreement.
- » The United States-Bahrain Free Trade Agreement.
- » The United States-Jordan Free Trade Agreement.
- » The United States-Oman Free Trade Agreement.
- » The United States-Morocco Free Trade Agreement.
- » The WTO Agreement on Electronic Commerce.

The second model, on the other hand, is used in the EU-United Kingdom Trade and Cooperation Agreement.



Guide to International Commitments



Electronic Payments

Electronic payment provisions in digital trade agreements are rare and should not be conflated with electronic invoicing provisions. We distinguish among three models: non-binding provisions, binding provisions, and detailed binding provisions.

The DCO Member States are involved in two trade agreements that cover electronic payments:

1. The African Continental Free Trade Agreement Digital Trade Protocol contains a binding provision with certain idiosyncrasies. First, it states that Parties shall support the development of affordable, real-time, safe, secure, inclusive, responsible and universally accessible cross-border digital payment, and settlement systems. Second, it requires Parties to develop an Annex on Cross-Border Digital Payments.
2. The WTO Agreement on Electronic Commerce includes a detailed binding provision.



SMEs and Digital Inclusion

Digital inclusion provisions in trade agreements are relatively novel and rare. Existing provisions follow the same cooperative model, sharing several core components with slight variations in binding nature. Recently, a new binding model has emerged, although it has yet to enter into force.

The DCO Member States are involved in one trade agreement that covers SMEs and Digital Inclusion: the African Continental Free Trade Agreement Digital Trade Protocol, which contains a novel binding provision.





Economic Analysis

To contextualize the analytical findings, the team conducted two analyses that describe the digital trade ecosystem across the DCO membership: a digital economy factsheet and a business survey to gather insights from the private sector.



Digital Economy Factsheet

The DCO Member States exhibit diverse digital economies across four key dimensions: digital economy size and activities, digital infrastructure and connectivity, digital skills, and digital government. The analysis examined each dimension using a range of indicators, highlighting the spectrum of digital advancement within the DCO region.

Size and Activities of the Digital Economy

To describe the size and activities of the digital economies in the DCO region, we used data provided by the World Trade Organization and conducted our own calculations. We specifically analyzed the share of advanced technology products in total trade (imports and exports), cross-border trade in telecommunications, computer, information, and audiovisual services (imports and exports), and total digitally delivered services (imports and exports).

The share of [advanced technology products](#) in imports varies considerably, from 4.58% to 24.99%, with a mean of 11.16%. Advanced technology products account for a smaller proportion of exports, ranging from 0.13% to 13.36%, with a mean of 2.9%.

[Cross-border trade](#) in telecommunications, computer, information, and audiovisual services also varies significantly. Imports range from USD 0.03 million to USD 4.5 billion, with a mean of USD 874 million and a total of USD 13.9 billion. Exports span from USD 0.57 million to USD 6.9 billion, with a mean of USD 1.47 billion and a total of USD 23.5 billion.

Total [digitally delivered services](#) exports in 2023 extend from USD 868,000 to USD 14.9 billion, with a mean of USD 4.0 billion and a total of USD 64.5 billion. Digitally delivered services imports range from USD 16 million to USD 24.9 billion, with a mean of USD 5.2 billion and a total of USD 82.7 billion.

Digital Infrastructure and Connectivity

To analyze the DCO Member States' digital infrastructure and connectivity, we analyzed data provided by the [International Telecommunications Union](#). We focused on internet access, broadband coverage, and internet traffic.

Internet use by individuals averages 73.8% but ranges from 32.9% to universal access. Household internet access shows a similar pattern, averaging 72.1% but spanning 21.9% to 100%.

Active mobile-broadband subscriptions per 100 inhabitants average 90.03 but vary from 35.6 to 174. 3G mobile network coverage is generally high, averaging 96.5% and ranging from 79.9% to 100% – although data is unavailable for one DCO Member State. 4G/LTE coverage is somewhat lower, averaging 93.03%, and extending from 67.7% to 100%. 12 DCO Member States exceed 75% coverage, while three remain below 80%. Data is also unavailable for one DCO Member State.

Mobile broadband internet traffic per subscription varies significantly, ranging 5.7 GB to 664.5 GB, with an average of 162.9 GB, although data is unavailable for one DCO Member State. Fixed broadband internet traffic per subscription is even more variable, extending from 9.4 GB to 10,003 GB, with a mean of 3,701 GB, again noting that data is unavailable for one DCO Member State.





Economic Analysis

Digital Skills

To document digital skills, we draw on data by [UNESCO](#). We use data points relevant to the digital skills of both sexes, beginning with general education and moving on to specific digital skills.

In terms of general education, upper secondary completion rates average 47.6% but range from 14.5% to 93.1%. No data is available for four DCO Member States. Gross tertiary enrollment ratios show an even wider range from 2.7% to 166.7%, with a mean of 44.95%. Adult literacy rates are generally high, averaging 84.5% and ranging from 58% to 99.4%, with no data available for one DCO Member State. Finally, government expenditure on education as a percentage of GDP shows significant variation, ranging from 0.35% to 6.02% with a mean of 3.5%.

The proportion of youth and adults with basic digital skills varies significantly:

- » The share of youth and adults able to copy or move a file or folder ranges from 5.1% to 73.1%, averaging 44.9%.
- » The share of youth and adults who have created electronic presentations ranges from 1% to 61.7%, with a mean of 24.5%.
- » The share of youth and adults able to install and configure software ranges from 2.4% to 89.5%, averaging 41.2%. Data is unavailable for five DCO Member States.

Digital Government

To examine the state of digital government across the DCO region, we rely on the [World Bank's GovTech dataset](#). Specifically, we analyze how the DCO Member States provide digital government services, establish institutions, and draft strategies.

In terms of digital government services, seven DCO Member States have an operational government cloud

platform. Five DCO Member States have a strategy or policy in place, while four have no government cloud platform. Nine DCO Member States have implemented a government interoperability framework, while four have planned one, and three do not have such a framework. Five DCO Member States provide a government open-source software advisory policy, one of which is a mandatory policy. The remaining DCO Member States do not have any such policy. Finally, open government portals are present in eleven DCO Member States and absent in five.

Regarding institutional frameworks for digital government, all 16 DCO Member States have established a government entity focused on government technology or digital transformation. 12 DCO Member States have established a government entity focused on public sector innovation, while two have planned such an entity. 10 DCO Member States have institutionalized a whole-of-government approach to public sector digital transformation, while four are planning to implement one. Two DCO Member States do not have such an approach.

Finally, DCO Member States have drafted various strategies to advance digital government:

- » 13 DCO Member States have a government technology or digital transformation strategy. Three are drafting such a strategy.
- » Strategies and programs to improve digital skills in the public sector are present in most DCO Member States. Eight have both a strategy and a program, while five have either a strategy or a program. Three DCO Member States have neither.
- » Strategies and programs to improve public sector innovation exist in most DCO Member States. Six countries have both a strategy and a program, while six have one or the other. Four countries have neither.





Economic Analysis



Business Survey

To gather private sector perspectives on digital trade barriers and opportunities, the team conducted a business survey with over 1,800 participants. Across each DCO Member State, the team inquired about how businesses participate in digital trade, which practical obstacles they face, and what regulatory challenges they encounter.

Business Characteristics

The businesses that participated in the survey all sell goods or services online. They vary in size: 14.7% have 1-10 employees, 20.7% have 11-50 employees, 17.8% have 51-200 employees, 24.2% have 201-1000 employees and 22.6% have over 1,000 employees. They also represent different sectors, most frequently retail trade services (28.37%), telecommunications, broadcasting and information supply services (5.35%), wholesale trade services (3.98%) and financial and related services (3.49%). 13% are subsidiaries of international companies, while 20.1% have a subsidiary abroad. Notably, many use artificial intelligence tools, with over 44% saying AI is important and 38% noting it as very important for their business.

Digital Trade Participation

To analyze how firms participate in digital trade, the survey inquired about both the distribution of international revenue and the online channels through which revenue is generated. The survey results show that international revenue is relatively evenly distributed across several major regions, with North Africa and Western Asia leading at 23.5% of total international revenue, followed closely by Sub-Saharan Africa at 22.4% and Central and South Asia at 21.3%. Europe and North America account for 16.9% of international revenue. The remaining regions contribute smaller shares, including East and South-East Asia (8.6%), Australia and New Zealand (3.6%), Latin America and the Caribbean (2.3%), and Oceania (1.3%).

The majority of online revenue comes from businesses selling physical goods or services through their own online shop or website, accounting for 51.8%. Other channels each contribute similar proportions, including selling physical goods through e-commerce platforms (12.3%), other sources (12.8%), and digital services such as tele-

work and online customer service (12.0%). Digital goods generate 6.0% of revenue, while digital infrastructure such as cloud services accounts for 5.1%.

Practical Obstacles to Digital Trade

To learn about the practical obstacles that businesses face, we asked for insights on the non-regulatory barriers they encounter when concluding sales, accessing the internet, executing online payments, and transferring data abroad. Most businesses find international online sales moderately challenging, with 33.9% reporting moderate difficulty. A significant portion finds it manageable, with 22.2% reporting it as easy and 18.3% as very easy. However, some businesses face more challenges, with 9.9% finding it hard and 2.5% finding it very hard. A small portion (0.1%) finds it impossible, while 13.1% do not engage in international online transactions.

High costs represent the most significant obstacle for online businesses in accessing the internet, cited by 48.6% of respondents, followed closely by slow speeds at 45.0% and limited coverage at 42.2%. Reliability issues impact 31.0% of respondents. A notable portion (14.1%) reports no obstacles, while a small fraction (0.6%) cites other challenges.

Several challenges affect electronic payments in similar ways. High transaction fees (50.1%) declined transactions (49.3%), and high compliance costs (49.5%) are the top concerns. Slow transaction speeds affect 48.4% of respondents, while security issues worry 48.1%. Interoperability issues (47.2%), a lack of payment gateways (37.3%), and legal uncertainty (38.8%) also present significant challenges. A smaller portion of respondents (22.7%) reports no obstacles.

To analyze how businesses overcome hurdles related to data transfers, we inquired about which data transfer mechanisms they rely on. Customer consent is the most commonly used mechanism at 62.5%, followed by standard contractual clauses at 54.3% and privacy certification at 49.8%. Binding corporate rules are employed by 38.6%, a similar figure to that of single transfer authorization by government authorities (36.8%). Governmental adequacy decisions are utilized by 28.3% of respondents. A notable portion (13.3%) is unsure about their mechanisms.



Economic Analysis

Regulatory Challenges for Digital Trade

When analyzing the regulatory aspects of digital trade, we inquired about the specific challenges businesses face when operating in an international context. Note that the respondents could select multiple-choice answers, which refer to four policy areas: data protection, cybersecurity, consumer protection, and electronic authentication.

In data protection, different requirements across countries present the biggest challenge at 60.8%, followed by data security concerns (53.4%), and complex procedures (53.2%). Less frequently, businesses are affected by legal uncertainty (40.6%) and a lack of customer trust in privacy policies (42.1%). Additionally, 20.8% of businesses report no obstacles.

Regarding cybersecurity, different requirements across countries again present the most significant challenge at 61.3%, followed by complex procedures at 53.0% and high compliance costs at 48.8%. Less frequently, businesses are affected by legal uncertainty (40.9%) and a lack of customer trust in data security measures (40.8%). Furthermore, 22.9% of businesses report no obstacles due to cybersecurity rules.

With consumer protection rules, different requirements across countries present the biggest challenge once again, at 58.6%, followed by complex procedures at 51.6% and product safety concerns at 50.1%. High compliance costs affect 47.2% of respondents. Legal uncertainty (41.4%), a lack of user trust (37.2%), and dispute resolution concerns (36.8%) also present significant challenges, while 22.0% of respondents report no obstacles.

Finally, regarding electronic authentication, security concerns are the leading challenge, at 55.5%. This is closely followed by privacy concerns (54.1%), different requirements across countries (53.6%), and complex procedures (52.4%), while high compliance costs impact 50.9%. Other significant challenges include legal uncertainty (44.1%), a lack of acceptance or standardization of electronic signatures (44.7%), and a lack of user trust in authentication methods (38.4%). A smaller portion of respondents (18.5%) reports no obstacles.





Economic Analysis



Conclusion

The Regulatory Assessments revealed that:

- » DCO Member States are at different stages of their regulatory journey across various policy areas.
- » Where DCO Member States are at a similar stage in their regulatory journey, their diversity has translated into a range of regulatory approaches. For instance, significant diversity exists in approaches to AI regulation, with some Member States adopting binding guardrails, while others focus on non-binding frameworks.
- » On the international front, certain DCO Member States have entered into a range of agreements, while many have yet to enter into international commitments on digital trade.

The Digital Trade Landscape Report found that:

- » The regulatory environments across the DCO Member States are diverse at all levels, including granular regulatory design choices. The aggregation of the findings across the DCO membership provides valuable guidance for DCO Member States.
- » The three perspectives through which domestic digital regulation affects digital trade can all be addressed through cooperation: market access conditions vary significantly across jurisdictions, consumer trust frameworks show different levels of maturity, and regulatory diversity creates both challenges and opportunities for cooperation.

The Guide to International Commitments highlighted that:

- » Existing digital trade agreements contain different models of provisions for each of the 12 in-scope policy areas. Approaches typically range from non-binding recognition formulations to detailed binding requirements.
- » The DCO Member States have entered into commitments in many, but not all, of the 12 in-scope policy areas. Their provisions follow different models in each relevant policy area.
- » By combining the insights from domestic regulation, provided in the Regulatory Assessment Reports and the Digital Trade Landscape Report, with the Guide to International Commitments, cooperation among DCO Member States can be facilitated.

The economic analysis revealed the importance of digital trade for the DCO Member States and the potential for growth and cooperation. It showed how businesses face significant regulatory complexity across borders, including challenges related to cybersecurity, data protection, and consumer protection. Infrastructure challenges are also substantial, with nearly half of respondents citing high costs and slow speeds as barriers. In addition, security and compliance costs are recurring concerns across all aspects of digital trade, from authentication to payments.



03

STAKEHOLDER ENGAGEMENT

STAKEHOLDER ENGAGEMENT

This section outlines the insights gathered from the stakeholder engagement that accompanied the analytical components of the Digital Trade Acceleration Initiative. Specifically, it provides an overview of the takeaways from two roundtable discussions with DCO Member States and outlines the key insights from the stakeholder interviews with government representatives. The way these components interact to provide a holistic view of the domestic and international design choices made by DCO Member States is outlined in the opening section (see above).



Roundtables

Approach

The team organized two in-person Roundtables in Geneva, gathering Ambassadors of the DCO Member States, representatives of international organizations, and global experts on digital trade. The first Roundtable was conducted on the sidelines of the WTO Public Forum at the Embassy Permanent Mission of the Kingdom of Saudi Arabia to the United Nations Office and other international organizations, on September 12, 2024. The second Roundtable was conducted at the Mandarin Oriental Hotel, on January 15, 2025.

Findings

September Roundtable

The first Roundtable focused on examining how the DCO Member States can leverage the information collected in the regulatory assessment reports to pursue digital cooperation. The objective was to present the collected information and discuss paths for the DCO Member States to pursue impactful and actionable cooperation to accelerate digital trade. The Roundtable format was planned as an exclusive, in-person event with a total of 50 participants joining the discussion. The event included a presentation of the Digital Trade Acceleration Initiative, expert reactions, and a strategic priorities discussion to

brainstorm options for the DCO Member States to leverage this information.

The Roundtable revealed that the DCO Member States have a unique opportunity to pursue digital cooperation since they have an unprecedented foundation of information:

- 1. Accelerating digital trade through trusted information:** The initiative provides comprehensive policy information to accelerate digital trade. The initial reports contain a first-of-its-kind regulatory assessment, business survey, and overview of international commitments.
- 2. Findings of the initial reports:** The initial reports provide an inventory of regulatory activity, with one-page summaries for each policy area and a total of over 2,500 official sources. This documentation of regulatory diversity shows how the DCO Member States are at different stages of their regulatory journeys and pursue diverse regulatory approaches.
- 3. Opportunities for digital cooperation:** The DCO is an international organization with a mandate focused on inclusive and sustainable growth of the digital economy.
- 4. Next steps:** The strategic priorities discussion revealed options for the DCO Member States to leverage this information but highlighted the importance of validating and contextualizing the findings.



January Roundtable

The second Roundtable focused on examining the findings from the Digital Trade Landscape Report and Guide to International Commitments and exploring potential paths for digital cooperation among DCO Member States. The session gathered representatives from DCO Member States to discuss how they can leverage regulatory diversity to accelerate digital trade.

The objective was to present the collected information and discuss paths for the DCO Member States to pursue impactful and actionable cooperation to accelerate digital trade. The Roundtable format was planned as an exclusive, in-person event structured to maximize engagement. It included a presentation of the Digital Trade Acceleration Initiative, a strategic discussion on cooperation mechanisms, and interactive dialogue on future directions.

The Roundtable revealed several critical insights into the state of digital cooperation and trade among DCO Member States:

1. **Regulatory Diversity:** DCO Member States are at different stages in their regulatory journeys, particularly in emerging areas like AI and cybersecurity. This diversity presents an opportunity for cooperation.
2. **Information Foundation:** The Initiative has created an unprecedented knowledge base, including:
 - » **Regulatory assessments:** Comprehensive analysis of all DCO Member States, across 12 policy areas, based on over 2,500 official sources.
 - » **Digital Trade Landscape Report:** Detailed mapping of different regulatory approaches and DCO-level aggregation of the core characteristics of digital regulation.
 - » **Guide to International Commitments:** First-of-its-kind analysis to inspire DCO Member States with different models for international alignment.
3. **Cooperation Mechanisms:** Three primary paths for cooperation emerged:
 - » Technical assistance for Member States at different regulatory stages.
 - » Platforms for constructive dialogue on regulatory approaches.
 - » Regulatory interoperability in areas of natural alignment.



Stakeholder Interviews

Approach

The stakeholder interviews served two core objectives: validating the findings of the regulatory assessment reports and complementing these findings with information on the current or upcoming priorities from a government perspective.

The team engaged with stakeholders through multiple channels, including in-person meetings, online consultations, and written correspondence. Primary contacts were established through permanent missions to international organizations in Geneva, as well as through direct outreach to relevant ministries and agencies in each member state. Key stakeholders typically included central banks, ministries of commerce/trade, telecommunications regulators, digital economy agencies, and consumer protection authorities.

Findings

The stakeholder consultations yielded several categories of feedback.

Rarely did stakeholders identify specific factual corrections to be made in the reports. Such correction requests included:

- » Updates to institutional names and responsibilities.
- » Clarification of regulatory hierarchies and enforcement mechanisms.
- » Correction of technical details in policy frameworks.
- » Adjustments to terminology used for specific regulatory concepts.

More frequently, stakeholders suggested incorporating additional elements into the reports. For instance, requests for additions concerned:

- » Recently enacted legislation or regulatory changes.
- » Ongoing policy initiatives and strategic frameworks.
- » Additional regulatory bodies or institutional arrangements.
- » Specific mechanisms for implementation and enforcement.

Most often, stakeholders provided context that enhanced the team's understanding of the regulatory landscape. Such information extended to:

- » Rationales behind specific regulatory approaches (e.g., data localization policies balancing sovereignty with innovation).
- » Institutional coordination mechanisms for the enforcement of digital rules.
- » Practical challenges in implementing digital trade regulations.
- » The evolution of regulatory frameworks in response to market developments.



Conclusion

The stakeholder engagement disseminated the findings of the Initiative and enhanced buy-in from the DCO Member States.

The stakeholder interviews gathered positive feedback on the methodology and findings, especially regarding the level of detail and structure of the regulatory assessment reports. The reports were widely recognized as accurate and comprehensive, with suggestions concerning technical rather than structural matters. Furthermore, targeted input on how the information can be leveraged for future cooperation was provided.

The Roundtables revealed that the DCO has a great opportunity and the momentum to make an extraordinary contribution to global digital trade. The DCO could become the trusted space for developing-country governments to openly discuss their concerns and learn about digital trade issues, and explore ways to cooperate on these matters. The Roundtables reinforced the DCO's leadership role in facilitating digital cooperation among the DCO Member States and leading the way for constructive, information-driven exchanges. The Roundtables demonstrated how the Digital Trade Acceleration Initiative delivers actionable insights and recommendations to enhance digital trade, promote inclusive economic growth, and strengthen cooperation.

The representatives of the DCO Member States and international organizations were impressed by how the Initiative supports the DCO's mission of accelerating digital transformation and creating more prosperous and inclusive digital economies across its Member States.



A photograph of two women in a library setting. The woman on the left, with dark curly hair in a bun and wearing a yellow polka-dot shirt, is smiling and looking down at a document. The woman on the right, with long brown hair and glasses, is also smiling and looking at the document while holding a pen. They are both holding a red clipboard. The document features several charts, including pie charts and bar graphs. In the background, there are white bookshelves filled with books.

04

ANNEX: QUESTIONNAIRE FOR REGULATORY ASSESSMENT

ANNEX: QUESTIONNAIRE FOR REGULATORY ASSESSMENT

For thriving digital trade, regulatory environments should be comprehensive and interoperable. The absence of fundamental regulatory building blocks, regulatory divergence or explicit barriers can hinder DCO trade reaching its potential. This questionnaire gathers granular evidence on the regulatory readiness for digital trade of each DCO Member State.

Data Protection

1. Is user consent required, and are there alternatives?

- ☐ User consent is always required
- ☐ User consent is required with alternatives
- ☐ User consent is never required
- ☐ Other: _____

2. Which data subject rights exist? Right to ...

- ☐ Information
- ☐ Access
- ☐ Rectification
- ☐ Deletion
- ☐ Objection
- ☐ Portability
- ☐ Other: _____

3. Are data processors required to have a local representative, e.g., data protection/complaint officer?

- ☐ No
- ☐ Yes, in specified cases
- ☐ Yes, always

4. Do data processors have to register with a government agency?

- ☐ No
- ☐ Yes, in specified cases
- ☐ Yes, always

5. Who oversees data protection?

- ☐ Independent data protection agency
- ☐ Ministry or government branch
- ☐ Sectoral bodies

Cross-Border Data Transfers

6. Are cross-border transfers regulated differently from in-country data transfers?

- ☐ Yes
- ☐ No

7. Is data subject consent required for cross-border transfers in general?

- ☐ Yes, alternative (either consent **or** one of the options below)
- ☐ Yes, cumulative (both consent **and** one of the options below)
- ☐ No (one of the conditions below applies instead)

8. Does the framework require these conditions for cross-border transfers in general?

- ☐ Governmental adequacy decisions: whitelist
- ☐ Governmental adequacy decisions: blacklist
- ☐ Standard contractual clauses
- ☐ Binding corporate rules
- ☐ Certification mechanisms (e.g., APEC CBPR; private certificate)
- ☐ Government notification for an individual transfer
- ☐ Government approval for an individual transfer
- ☐ Other: _____

9. Are there specific conditions for certain cross-border data transfers? If so, please check for each identified requirement:

- ☐ Transfer type: _____
- ☐ Condition (see above): _____
- ☐ Public policy objective invoked: _____

Location of Computing Facilities

10. Is there a general data localization requirement?

- ☐ Yes
☐ No

11. Are there specific data localization requirements for these data types?

- ☐ Communications data
☐ Infrastructure data
☐ Government data
☐ Health data
☐ Financial / payment data
☐ Accounting records
☐ Geolocation data (including transportation data)
☐ Other: _____

12. What is the public policy objective invoked?

- ☐ _____

Online Consumer Protection

13. How is online consumer protection regulated?

- ☐ Specific framework
☐ Application of general framework

14. Are the following practices considered violations of consumer protection?

- ☐ A practice of making misrepresentations of material facts, including implied factual misrepresentations, that cause significant detriment to the economic interests of misled consumers;
☐ A practice of failing to deliver products or provide services to consumers after the consumers have been charged; or
☐ A practice of charging or debiting consumers' financial, telephone or other accounts without authorization;
☐ Other: _____ (e.g., dark patterns)

15. Do e-commerce platforms have special—indirect—obligations in consumer protection?

- ☐ No
☐ Yes, as follows: _____

16. Who oversees consumer protection?

- ☐ Independent consumer protection agency
☐ Ministry or government branch
☐ Sectoral bodies

17. Is there a comprehensive regulatory framework specifically addressing spam?

- ☐ No
☐ Specific framework
☐ Application of general framework

18. What is the regulatory approach regarding spam?

- ☐ General prohibition
☐ Prohibition with exceptions
Specify exceptions: _____

Electronic Transactions

19. Electronic Transactions

- ☐ Does the Member State have a binding domestic electronic transactions framework?
☐ No
☐ Yes
☐ Are electronic transactions recognized as equivalent to paper-based transactions?
☐ No
☐ Yes, always
☐ Yes, with exceptions

If possible: Identify sectors or activities with different treatment of electronic transactions.

20. Electronic Signatures

- ☐ How many different kinds of electronic signatures are established in the relevant framework?
☐ 0
☐ 1
☐ 2
☐ 3
☐ 4
☐ ...

- ☐ List each type of electronic signature, if possible, with examples of transactions for which it is required.

☐ _____

- ☐ Are foreign-issued electronic signatures recognized?

☐ No

☐ Yes

21. Electronic authentication (often also referred to as “Digital Identity Management”)

- ☐ Is electronic authentication permitted?

☐ No

☐ Yes, always

☐ Yes, with exceptions

If possible: Identify sectors or activities with different treatment of electronic authentication.

- ☐ Is there a governmental authentication service that can be used for private transactions?

☐ No

☐ Yes

Trade Facilitation with Digital Means

22. Paperless trade through electronic documents in customs procedures

- a. Are the necessary trade administration documents for imports available in electronic form [general assessment, not each specific form]?

☐ Yes, in the official language

☐ Yes, also in other languages

☐ No

- b. Can these electronic trade administration documents be submitted in electronic form?

☐ Yes

☐ No

23. Single Windows, enabling persons to submit documentation for import, export, or transit through a single-entry point to authorities

- c. Is there a Single Window system implemented for trade documentation?

☐ Yes, operational

☐ Yes, planned

☐ No

- d. Does the Member State align this Single Window to support data/document exchange internationally?

☐ With other DCO Member States?

☐ Abroad?

- e. Are there expedited/simplified customs procedures for low-value shipments?

☐ Yes. Threshold: _____

☐ No

Cybersecurity

24. Is there a cybersecurity framework?

☐ Yes

☐ No

25. Are the obligations different based on risk level?

☐ No

☐ Yes

If yes, specify the risk tier _____

26. Does the framework require incident notification?

☐ No

☐ Yes, to users

☐ Yes, to the government

27. Who oversees cybersecurity?

Artificial Intelligence

28. Is there a specific framework for AI?

- ☐ Yes, binding
- ☐ Yes, non-binding (including visions and guidelines)
- ☐ No

29. For binding frameworks: Does it differentiate AI risk categories?

- ☐ Yes
- ☐ No

30. For binding frameworks: Does it regulate specific AI technologies?

- ☐ Yes
- ☐ No

31. Have regulatory agencies released guidance on how the existing (non-AI-specific, such as privacy) framework applies to AI?

- ☐ Yes
- ☐ No

Source Code

32. Is source code generally protected under the IP framework?

- ☐ No
- ☐ Yes, always
- ☐ Yes, with exceptions

If so, what exceptions exist to this protection (e.g., national security)? _____

33. Are there mandatory source code sharing requirements?

- ☐ Circumstance: _____
1. Check if this requirement exists as an ex-ante condition for market access
- ☐ Type of software or application affected: _____
- ☐ Public policy objective invoked: _____

Digital Economy Taxation and Customs Duties

34. Are there any customs duties or import-related fees applied to digital services or digital products?

- ☐ No
- ☐ Yes, always
- ☐ Yes, with thresholds

1. Specify threshold (e.g., import value): _____

35. Are there any indirect taxes on digital services or digital products (e.g., VAT, GST)?

- ☐ No
- ☐ Yes, always
- ☐ Yes, with thresholds

1. Specify threshold (e.g., revenue): _____

36. Are there any customs duties or import-related fees applied to e-commerce imports?

- ☐ No
- ☐ Yes, always
- ☐ Yes, with thresholds

1. Specify threshold (e.g., import value): _____

37. Are any indirect taxes applied to e-commerce imports (e.g., VAT, GST)?

- ☐ No
- ☐ Yes, always
- ☐ Yes, with thresholds

1. Specify threshold (e.g., revenue): _____

38. Are there any direct taxes on providers of digital services or digital products (e.g., digital service taxes)?

- ☐ No
- ☐ Yes, always
- ☐ Yes, with thresholds

1. Specify threshold (e.g., revenue): _____

39. For each tax, duty, or fee, is electronic registration possible for foreign providers?

- ☐ Yes
- ☐ No

Electronic Payments

40. Is there a comprehensive regulatory framework specifically addressing electronic payments?

- ☐ No
- ☐ Specific framework
- ☐ Application of a general framework

41. Does the Member State have know-your-customer (KYC) rules that apply to electronic payments?

- ☐ No
- ☐ Yes, with thresholds
1. Specify threshold: _____
- ☐ Yes, general

42. Does the member state have anti-money-laundering (AML) rules that apply to electronic payments?

- ☐ No
- ☐ Yes, with thresholds
1. Specify threshold: _____
- ☐ Yes, general

43. Does the member state have counter-terrorism-financing (CTF) rules that apply to electronic payments?

- ☐ No
- ☐ Yes, with thresholds
1. Specify threshold: _____
- ☐ Yes, general

44. Are there licensing requirements and procedures for entities wishing to offer electronic payment services?

- ☐ No
- ☐ Yes
1. Specify: _____

45. Are there special regulatory requirements for cross-border electronic payments? (Focus on payment regulation; data-related are addressed above.)

- ☐ No
- ☐ Yes
1. Specify: _____

SMEs and Digital Inclusion

46. Does the government have specific programs or initiatives to support SMEs or disadvantaged groups in participating in the digital economy or digital trade?

- ☐ Yes
- ☐ No

47. For each program:

- a. What is the stated objective of support?
- ☐ Upskilling (digital literacy; technical skills)
 - ☐ Upgrading (buying new technology)
 - ☐ Improved connectivity (mobile, broadband)
 - ☐ Process digitalization
 - ☐ Establishing a digital presence (website; ecommerce)
 - ☐ Adoption of digital payments
 - ☐ Enhancing cybersecurity measures
 - ☐ Enhancing privacy measures
 - ☐ Other: _____
- b. What form of support is provided?
- ☐ Financial grant
 - ☐ In-kind grant
 - ☐ State-supported loan
 - ☐ Tax or social security relief
 - ☐ Production subsidy
 - ☐ Technical assistance services
 - ☐ Regulatory assistance services
 - ☐ Other consulting services
 - ☐ Other: _____
- c. Who does the program target?
- ☐ SMEs
 - ☐ Women-owned businesses
 - ☐ Minority-owned businesses
 - ☐ Other minority-owned businesses
 - ☐ Rural businesses
 - ☐ Other: _____



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