



January 28, 2021

Dear JSI Co-Convenors:

The members of the Global Services Coalition, a network of trade associations that represent services businesses in Asia and the Pacific Rim, Europe, North and South America, strongly support your efforts to forge international agreement on key trade disciplines for e-commerce. We commend your ongoing leadership of the negotiations and the development of a consolidated text to use as the basis for further negotiations.

The coronavirus pandemic has only underscored the critical role of digitally delivered services, which have helped public institutions and business remain resilient in the face of prolonged social and economic disruptions. But even before the pandemic, digital services had already become woven into the fabric of virtually every economic sector, from agriculture to manufacturing, as well as services. Across the globe, digital connectivity and data sharing have contributed to better outcomes in everything from public health to economic growth and greater inclusiveness.

Given the increasingly important role that digitally delivered services play in our lives, it is all the more important that we develop ambitious digital trade disciplines. As WTO members begin to consider a consolidated text on digital trade, we would like to highlight what we consider to be core building blocks of any high-standard and commercially meaningful agreement.

We believe it is critical that a JSI outcome should include the following:

- Allowing data to flow across borders in a manner that facilitates interoperability while respecting WTO members' regimes for privacy and security
- Prohibition on forced localization, including for financial service suppliers
- Prohibition on forced disclosure of source code and algorithms
- Permanent ban on custom duties on electronic transmissions
- Enhancing trust in electronic commerce by ensuring strong consumer protection measures and adopting rules on e-signatures, e-contracts, e-authentication, spam, open government data, etc.
- Adopting disciplines requiring a risk-based approach to cybersecurity measures
- Adopting enhanced trade facilitation provisions to encompass the goods-related aspects of e-commerce and the logistics services that allow e-commerce activities to thrive
- New market access commitments in e-commerce-related services, particularly for online delivery of services

With regard to GSC members' focus on securing new market access commitments in e-commerce-related services, we are encouraged by the JSI co-convenors' December 2020 statement that JSI participants have developed a possible framework for negotiating market access commitments in key e-commerce related sectors. We believe that commitments in areas such as computer and related services, electronic payments and other financial services, logistics, and telecommunications are critical to making e-commerce disciplines fully effective.

We fully support your efforts to ensure the JSI negotiations will achieve substantial progress towards a final, high-standard E-Commerce Framework Agreement by the 12th WTO Ministerial Conference. We stand ready to continue our work in support of the negotiations and your outstanding leadership.

Sincerely yours,

The Global Services Coalition

Australian Services Roundtable

Business New Zealand

Canadian Services Coalition

Coalition of Services Industries

European Services Forum

Hong Kong Coalition of Services Industries

Indonesia Services Dialogue Council

Japan Services Network

Singapore Business Federation

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