

Annex C – Template for Submission of Feedback

Feedback submitted by:

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Feedback on the Indo-Pacific Economic Framework (IPEF):

A. Overall

S/N	Feedback
1.	<p>The Computer & Communications Industry Association (CCIA) welcomes the opportunity to submit comments to the Singapore Ministry of Trade and Industry (MTI) on the Indo-Pacific Economic Framework (IPEF).¹ CCIA is an international, not-for-profit trade association representing a broad cross section of communications and technology firms.² Many CCIA Members have regional headquarters in Singapore and provide products and services to the region, including many of the IPEF participants, from Singapore.³</p> <p>IPEF represents an opportunity to build off existing agreements such as the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) to advance trade in the Asia-Pacific Region — a region of continuous source of growth and investment.</p>

(Please add additional rows as required.)

B. Trade Pillar

S/N	Feedback
1.	<p>As part of the Trade Pillar of the IPEF, Parties should be ambitious in their negotiating goals to address as many access barriers to digital exports as possible, and secure binding rules and commitments from trading partners. Parties should secure binding commitments with meaningful enforcement mechanisms and clear built-in review mechanisms to ensure that the IPEF</p>

¹ <https://www.mti.gov.sg/Newsroom/Public-Consultations/Active-Consultations/Public-Consultation-on-the-Indo-Pacific-Economic-Framework>

² CCIA is an international, not-for-profit trade association representing a broad cross section of communications and technology firms. For fifty years, CCIA has promoted open markets, open systems, and open networks. The Association advocates for sound competition policy and antitrust enforcement. CCIA members employ more than 1.6 million workers, invest more than \$100 billion in research and development, and contribute trillions of dollars in productivity to the global economy. For more, visit www.ccianet.org.

³ <http://www.demystifyasia.com/global-companies-regional-headquarters-singapore/>

	<p>continues to be durable and effective. There should not be broad exceptions that render commitments meaningless, such as the broad exceptions outlined in the Regional Comprehensive Economic Partnership that limited the effectiveness of trade liberalization through trade agreements. To the extent flexibility is needed within the Trade Pillar, CCIA encourages Parties to allow for phased-in implementation of commitments rather than carve-outs.</p> <p>As these negotiations are conducted, there should be measures taken to ensure transparency. The IPEF, as currently framed, is to be a multifaceted framework that aims to include trade commitments and other market access agreements, as well as other agreements on strategic cooperation among key partners. Given the new multi-structured approach, transparency will be even more important as compared to traditional trade negotiations. There should be readouts following each negotiation round or key engagements that inform stakeholders on topics being discussed and how parties seek to memorize commitments or agreements reached. Further, there should be meaningful opportunities for engagement by all stakeholders to address ongoing discussions as they occur.</p> <p>This section addresses the following items identified under the Trade Pillar in the September 2022 Ministerial Statement: Digital Economy, Transparency and Good Regulatory Practices, Competition Policy, Labor, and Environment.</p>
2.	<p>1. Digital Economy</p> <p>Parties should be ambitious in negotiating binding commitments in the IPEF that pertain to digital trade and the cross-border delivery of Internet services.</p> <p>It is encouraging that many IPEF partners have pursued similar rules in agreements including the U.S.-Japan Digital Trade Agreement, the e-commerce chapter of the CPTPP, the digital trade chapter of the U.S.-Mexico-Canada Agreement, and the Singapore-Australia Digital Economy Agreement. Strong digital economies also benefit substantially from a balanced intellectual property regime and online enforcement mechanisms that enable stakeholders to address infringement.</p> <p>The following section identifies key provisions that should be included in the digital trade portion of the Trade Pillar.</p> <p style="padding-left: 40px;"><i>a. Enabling cross-border data flows and trust in digital services.</i></p> <p>These negotiations present an opportunity to further enable digital trade and the Parties should be ambitious in their negotiating objectives with respect to data flows and localization barriers. Cross-border data flows are critical to digital trade, and forced localization mandates make it difficult for exporters to expand into new markets. Studies have found that “for many countries that are considering or have considered forced data localization</p>

laws, local companies would be required to pay 30-60% more for their computing needs than if they could go outside the country's borders."⁴ Another study found that the impact of recently proposed or enacted data localization legislation on GDP is "substantial" in seven countries.⁵ Recent analysis from the OECD has revealed an increasing level of restrictiveness for digitally-enabled services in part due to restrictions on cross-border movement of data.⁶ Cross-border data flows are the lifeblood of global digital trade and by extension the array of industries that increasingly rely on the Internet to compete in the global marketplace. Particularly in markets across the Indo-Pacific—especially Singapore—where many multinational firms have an established presence and send and receive data from other jurisdictions, the free flow of data across borders is crucial to functioning digital services.

With an uptick in data-related barriers in recent years, trade discussions and clear rules are critical to ensure that any restrictions are consistent with existing international obligations and are targeted in a manner that does not unreasonably limit legitimate cross-border trade. Policies that restrict data flows, either directly through explicit data and infrastructure localization requirements, or indirectly for national security or other purposes, negate the productivity gains and efficiencies enabled by Internet platforms and cloud computing.

Singapore's membership in the Global Cross-Border Privacy Rules Forum, as well as its membership of the APEC Cross-Border Privacy Rules system, confirm a shared desire to promote trusted global data flows and privacy protection along with many IPEF members.

IPEF Parties should continue to pursue rules that prohibit governments from interfering with data flows or the exchange of information online, and prohibit regulations or standards that condition market access, procurement, or qualification for certain standards based on nationality of ownership, location of corporate headquarters, or size of company. Specifically, rules should prohibit governments from imposing data localization or local presence requirements on data controllers or processors, as well as linking market access and/or commercial benefits to investment in or use of local infrastructure. To the extent possible, these prohibitions should apply to both explicit and indirect measures to keep data in a particular country. Articles 19.11 and 19.12 of the USMCA Digital Trade chapter represent the strongest rules in trade agreements in force pertaining to cross-border data flows and localization prohibitions. IPEF

⁴ Leviathan Security Group, *Quantifying the Cost of Forced Localization* (2014), available at <https://static1.squarespace.com/static/556340ece4b0869396f21099/t/559dad76e4b0899d97726a8b/1436396918881/Quantifying+the+Cost+of+Forced+Localization.pdf>.

⁵ Matthias Bauer *et al.*, *The Costs of Data Localization* (ECIPE 2014), available at http://www.ecipe.org/wp-content/uploads/2014/12/OCC32014__1.pdf (finding that the GDP was reduced in the following countries with data localization policies: Brazil (-0.2%), China (-1.1%), EU (-0.4%), India (-0.1%), Indonesia (-0.5%), Korea (-0.4%), and Vietnam (-1.7%)).

⁶ OECD Services Trade Restrictiveness Index: Policy Trends up to 2020, available at <https://issuu.com/oecd.publishing/docs/oecd-stri-policy-trends-up-to-2020?fr=sNmVINzYxOTI3Mw>.

members should build off the USMCA, and it is encouraging that IPEF members such as Singapore and Australia have already secured similar agreements through Article 23 of the Singapore-Australia DEA committing to refrain from “prohibit[ing] or restrict[ing] the cross-border transfer of information by electronic means, including personal information, if this activity is for the conduct of business of a covered person.”⁷

Trust in the cross-border delivery of these services is critical. Without adequate privacy protections and security in digital communications, governments may continue to enact restrictions on cross-border services citing perceived risks. Privacy and consumer protections and trade rules should work in tandem to further goals of initiatives including the “data free flow with trust” launched by heads of governments under Japan’s G20 leadership in 2019.

To that end, IPEF countries should prioritize development of national privacy legislation that sets clear rules on the use of personal data domestically; promote the adoption of bilateral and multilateral agreements on government access to data, such as those being pursued by the OECD⁸; and commit to codify into domestic law protections for valid basis for transfer of personal data, such as the APEC Cross-Border Privacy Rules.

b. Permanent prohibition on customs duties for electronic commerce.

Imposing customs requirements on purely digital transactions creates significant and unnecessary compliance burdens on nearly all enterprises, including small and medium-sized enterprises (SMEs). There would need to be several requirements created that would accompany such an approach, many of which would be extremely difficult to comply with. For instance, data points required for compliance include the description of underlying electronic transfer, end-destination of the transmission, value of transmission, and the country of origin of the transmission — all of which do not exist for most electronic transmissions, especially in the cloud services market.

The 2nd Ministerial Conference of the World Trade Organization in 1998 produced the Declaration of Global Electronic Commerce which called for (1) the establishment of a work program on e-commerce and (2) a moratorium on customs duties on electronic transmission. The moratorium has been renewed at every Ministerial since that time.

The moratorium has been key to the development of global digital trade and shows the international consensus with respect to the digital economy, reflected in the number of commitments made in free trade agreements among multiple leading digital economies. Permanent bans on the

⁷ <https://www.dfat.gov.au/sites/default/files/australia-singapore-digital-economy-agreement.pdf> at 25

⁸ OECD work stream on Trusted Government Access to Data held by the Private Sector, <https://www.oecd.org/digital/trusted-government-access-personal-data-private-sector.htm>.

imposition of customs duties on electronic transmissions are also a frequent item in trade agreements around the world. This includes, but is not limited to, Article 5 of the Singapore-Australia Digital Economy Agreement,⁹ Article 14.3 of the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP),¹⁰ Article 19.3 of the U.S.-Mexico-Canada Agreement (USMCA),¹¹ and Article 8.72 of the EU-Japan Economic Partnership Agreement.¹²

c. Non-discriminatory approach to cybersecurity certification.

Cybersecurity is a necessity as countries across the Indo-Pacific region work to advance their digital transformation goals for their government, their economies, and their societies. However, there is a growing trend of governments using cybersecurity certification requirements to discriminate against foreign technology companies, particularly in the cloud sector. Some countries in the Indo-Pacific region require government agencies, state-owned entities, and even critical infrastructure companies to select only from vendors with a national cybersecurity certification, which foreign companies are unable to meet. As part of the digital component in the IPEF, Singapore should secure binding commitments from trading partners to adopt a risk-based approach to cybersecurity certifications, as well as to treat foreign companies no less favourably than local companies in the cloud sector, and specifically to agree that cybersecurity certification eligibility should not be conditioned on nationality of ownership of a cloud company seeking such certification.

d. Online content regulation and state-censorship practices.

Censorship and denial of market access for foreign Internet services has long been the case in restrictive markets like China, but it is becoming increasingly common in emerging digital markets as well as some traditional large trading partners, and accomplished through different tools and methods.

IPEF partners should work together to address rising digital authoritarianism and state-censorship practices that pose threats to the open Internet and freedom of expression around the world. Because the business community has a limited technical capacity to assess and respond

⁹ <https://www.dfat.gov.au/sites/default/files/australia-singapore-digital-economy-agreement.pdf> at 10

¹⁰ Final Text of Comprehensive and Progressive Agreement for Trans-Pacific Partnership, signed Mar. 8, 2018, <https://www.mfat.govt.nz/assets/Trans-Pacific-Partnership/Text/14.-Electronic-Commerce-Chapter.pdf>.

¹¹ Final Text of U.S.-Mexico-Canada Agreement, signed Nov. 30, 2018, https://ustr.gov/sites/default/files/files/agreements/FTA/USMCA/Text/19_Digital_Trade.pdf.

¹² Final Text of Agreement Between EU and Japan for Economic Partnership, http://trade.ec.europa.eu/doclib/docs/2018/august/tradoc_157228.pdf#page=185.

to interference with cross-border flow of services, products, and information by nation-states, allied governments have a critical role to play in partnering with technology companies and leading in the defence of Internet freedom and open digital trade principles.

Countries should affirm commitments under Article 19 of the International Covenant on Civil and Political Rights as they apply to defending free expression online. The IPEF should include clear commitments to refrain from blocking or restricting access to lawful online content, digital services, and infrastructure underlying Internet delivery.

Government-imposed restrictions of digital services and online content can take multiple forms, and the risks associated with each method or regulatory framework providing for censorship methods can vary greatly.¹³ For example, some types of content restrictions may be reasonable and legally permissible in certain contexts, but may result in overbroad removals of user speech if attached to filtering or monitoring requirements. Other trade concerns arise where content policies are not applied equally to both domestic and foreign websites. Furthermore, an increasing number of content restrictions do not comply with World Trade Organization (WTO) principles of transparency, necessity, minimal restrictiveness, and due process to affected parties.

Internet services recognize the importance of ensuring user trust and safety and have significantly increased resources to ensure that their services remain spaces for free expression, that users comply with their terms of service, and that illegal or harmful content that violates their terms of service is identified and removed. But the expanding array of emerging content regulatory frameworks often have the impact of making it harder, rather than easier, for Internet companies to strike the right balance between promoting free expression and taking action against dangerous content.

Trade rules should be modernized in a manner that promotes liability rules that are consistent, clear, and work for Internet companies of all stages of development, to encourage the export of Internet services. Doing so enables Internet exporters to establish comprehensive practices to proactively address harmful content and behaviour that violates terms of service, while enabling open discourse online. These commitments should work in tandem with commitments on good regulatory practice and additional global standards on content removal that ensure due process, oversight, and accountability.

e. Securing digital communications and devices.

Providers of digital devices and services have sought to improve the security of their platforms through the deployment of technologies that safeguard the communications and commercial transactions that they enable. Strong encryption has been increasingly enabled on now-

¹³ See https://www.usitc.gov/press_room/news_release/2022/er012711878.htm.

ubiquitous smartphones and deployed end-to-end on consumer-grade communications services and browsers. Encrypted devices and connections protect users' sensitive personal and financial information from bad actors who might attempt to exploit that information.

Many countries, at the behest of their respective national security and law enforcement authorities, have passed laws that mandate access to encrypted communications. Often the relevant provisions are not explicit, but mandate facilitated access, technical assistance, or compliance with otherwise infeasible judicial orders. Other versions require access to or transfer of source code as a condition of allowing technology imports. Other recent measures impose "traceability" requirements that undermine encryption measures, like those included in India's 2020 IT Act (Intermediary Rules) Amendments.¹⁴ Such exceptional access regimes run contrary to the consensus assessments of security technologists because they are technically and economically infeasible to develop and implement.¹⁵ Companies already operating in countries that have or are considering anti-encryption or source code access laws will be required to alter global platforms or design region-specific devices, or face fines and shutdowns for noncompliance. Companies that might have otherwise expanded to these markets will likely find anti-encryption or facilitated access requirements to be barriers to entry.

IPEF countries should promote regulatory cooperation and international standards for securing products and services. The IPEF should contain commitments to promote strongly encrypted devices and connections. Specifically, the IPEF should prevent countries from compelling manufacturers or suppliers to use a particular cryptographic algorithm or to provide access to a technology, private key, algorithm specification, or other cryptographic design details. Similarly, the IPEF should prohibit governments from conditioning market access, with appropriate exceptions, on their ability to demand access to cryptographic keys or source code. Additionally, the IPEF should include commitments for partners to pursue risk-based cybersecurity measures, as they are the more effective approach in comparison to prescriptive regulation. IPEF partners should pursue cooperative approaches to cybersecurity and incident responses, including sharing of information and best practices.

f. Fostering innovation in emerging technologies.

Emerging technologies such as artificial intelligence (AI) and machine learning, as well as quantum computing, increasingly impact cross-border trade, and trade rules increasingly govern the development and growth of these technologies. To continue to use and export AI and other emerging

¹⁴ <https://prsindia.org/billtrack/the-information-technology-intermediary-guidelines-and-digital-media-ethics-code-rules-2021>

¹⁵ Harold Abelson, et al., Keys Under Doormats: Mandating insecurity by requiring government access to all data and communications, MIT Computer Science and Artificial Intelligence Laboratory Technical Report, July 6, 2015, <http://dspace.mit.edu/bitstream/handle/1721.1/97690/MIT-CSAIL-TR-2015-026.pdf>.

technologies, businesses and users need a trade framework that allows them to move data and infrastructure safely across borders while ensuring that other countries will not misuse legal systems to impede the growth of new technologies. This will enable use of emerging technologies in addressing global challenges such as public health, humanitarian assistance, and disaster response.

Trade rules that can facilitate the responsible cross-border growth of AI technologies include those on enabling cross-border data flows and removing localization requirements; encouraging governmental investment in and release of open data; identifying and sharing best practices for the responsible use of AI; cooperation and public-private collaboration on AI; and the adoption of innovation-oriented copyright rules that enable machine analysis of data. In addition, to ensure substantive convergence and avoid the potential for discriminatory outcomes, IPEF parties should agree to avoid adopting any measures that violate national treatment rules or give less favourable treatment to AI products or applications than they give to like products or applications without an AI component.

As a matter of good regulatory practice, the development and implementation of AI regulations should include: adopting a risk-based approach, including transparent processes for assessing, managing, and mitigating risks associated with specific AI applications; assessing whether potential risks can be mitigated or addressed using existing instruments and regulatory frameworks; considering whether any new or proposed regulation is proportionate in balancing potential harms with economic and social benefits; employing risk management best practices, including considering the risk-substitution impact of a specific AI application against a scenario where that application has not been deployed but baseline risks remain in place; and promoting the development of voluntary consensus standards to manage risks associated with AI applications in a manner that is adaptable to the demands of dynamic and evolving technologies.

In addition to trade rules, IPEF countries should work together to facilitate research and development of new applications of AI to address shared challenges; facilitate dialogues among all stakeholders including governments, civil society, academic, and the private sector on best regulatory practices; and pursue joint discussions on the responsible and ethical use of AI.

g. Following global practices on Internet access and interconnection policies.

Countries participating in the IPEF should work to protect the interoperable and interconnected nature of the global Internet architecture that enables cross-border data flows; support principles of non-discrimination and market access to telecommunications networks; and enable stakeholders to negotiate the nature of services to be delivered across the network on a voluntary market-driven basis, based on reasonable business practices agreed upon by both sides.

There are recent proposals that threaten this approach and risk creating significant barriers to cross-border data flows by taxing the delivery of online content demanded by consumers.¹⁶

Globally, the business practice on Internet interconnection is for content providers and ISPs to enter into agreements through autonomous negotiations. An OECD paper found that 99.5% of interconnections are made without written contracts, and “the Internet model of traffic exchange has produced low prices, promoted efficiency and innovation, and attracted the investment necessary to keep pace with demand.” IPEF countries should recognize that international Internet connection charges should be negotiated on a commercial basis and that access to domestic telecommunications network should be on reasonable and non-discriminatory terms.¹⁷

h. Provisions to enable trade in electronic services.

Electronic payment (e-payment) systems which are interoperable across borders are critical in enabling the growth of cross-border digital trade. Trade policy can help drive the development of cross-border e-payment systems through commitments on the free flow of data including financial services data; promoting interoperability through international standards; and encouraging open innovation and competition through the adoption of open e-payment models, such as real-time payments (RTP) systems, and encouraging open application programming interfaces (APIs) to allow all e-payment service providers to compete.

Countries should pursue provisions on electronic signature, electronic authentication, paperless trading, and other best practices often included in trade agreements.

i. Copyright rules for emerging technologies.

A flexible copyright regime is necessary for the continued growth of the digital economy. Principles such as fair use have been a cornerstone of U.S. copyright law, and industries that rely on this right are a significant contributor to the U.S. economy and exports. Fair use is also critical to activities that are central to new areas of innovation and cutting-edge technology, such as artificial intelligence and text and data mining.¹⁸ To the extent copyright considerations are included in the IPEF trade discussions, the Parties should pursue commitments that foster innovation in emerging technologies.

¹⁶ See <https://www.hudson.org/research/17470-a-harmful-step-for-the-internet-in-korea>; <http://www.koreaherald.com/view.php?ud=20220302000769>.

¹⁷ For example, Article 14.2 of the U.S.-Korea Free Trade Agreement provides helpful text to address this.

¹⁸ European Alliance for Research Excellence, *The Global AI Race* (June 2018), <http://eare.eu/assets/uploads/2018/06/Global-AI-Race.pdf>.

3.	<p data-bbox="347 230 1101 264">2. Transparency and Good Regulatory Practices</p> <p data-bbox="300 297 1358 551">International regulatory cooperation is an important tool for improving regulatory quality, reducing the likelihood of creating trade barriers or unnecessary regulatory differences, aligning regulation with shared principles and values, avoiding unintended consequences or conflicts with broader foreign policy objectives, building trust and expertise among regulators, and deepening understanding of trends in regulatory governance to inform current and future approaches to policymaking.¹⁹</p> <p data-bbox="300 580 1382 833">This is critical as countries move fast to introduce new regulatory frameworks on data governance, and seek to craft rules on the development of emerging technologies. Across digital governance frameworks, regulations should be non-discriminatory and principles-based, made pursuant to a transparent regulatory process, ensure due process to those affected, and include adequate safeguards to reduce the impact of any unintended consequences.</p> <p data-bbox="300 862 1385 1373">IPEF parties should pursue binding commitments on good regulatory procedures that promote transparency and accountability in the development and implementation of regulations in the Trade Pillar of the IPEF. This includes provisions like those secured in Chapter 28 of USMCA on transparent development of regulations (Art. 28.9) through timely publication of draft regulatory measures and public consultations, regulatory impact assessment requirements (Art. 28.11), and retrospective review of regulations (Art. 28.13). The IPEF further presents an opportunity to build off these provisions to include additional practices relevant for the regulation of the digital economy, including through the promotion of international standards in regulation of digital services to enhance regulatory coherence and interoperability, and ensure that technical requirements are no more restrictive to trade than necessary to fulfil a legitimate government objective.</p> <p data-bbox="300 1402 1377 1836">The IPEF should also include services-specific “good governance” provisions that supplement the general good regulatory practice obligations detailed above. In USMCA, Article 15.8 of the Cross-Border Trade in Services chapter describing the “development and administration of measures” addresses matters such as fair administration of licensing procedures, and transparency and timeliness in regulatory processes. There are also provisions in Chapter 15 of USMCA that prevent active discriminatory measures on foreign services, placing clear obligations on governments to allow foreign suppliers to enter the market and provide digital services to business and consumers in their country. This includes provisions on “national treatment” (Art. 15.3), “most-favoured-nation treatment” (Art. 15.4), prohibition against quantitative supplier limitations</p>

¹⁹ See CCIA Recommendation on U.S.-EU Trade & Technology Council: Incorporating Stakeholder Input within International Regulatory Cooperation, <https://www.cciainet.org/wp-content/uploads/2021/09/CCIA-TTC-Recommendations-Incorporating-Stakeholder-Input-within-International-Regulatory-Cooperation-2021.pdf>.

	(Art. 15.5), “local presence” (Art. 15.6), and “payments and transfers” (Art. 15.12).
4.	<p>3. Competition Policy</p> <p>Competition provisions in trade agreements help to propagate pro-competitive policies around the world.²⁰ IPEF countries should promote and strengthen a common understanding of the importance of maintaining competitive markets that deliver consumer welfare benefits. These provisions also foster convergence on substantive principles and procedural norms that increase legal certainty for businesses and consumers across multiple jurisdictions. To increase convergence, the parties should agree to avoid targeted rules or thresholds for specific sectors or groups of companies, which create the potential for discretionary or discriminatory implementation of competition rules, including in the digital context. As countries around the world, including those in the Indo-Pacific Region, look to review existing competition rules in light of the digitalized global economy, IPEF partners should work to ensure that any new approaches follow recognized good regulatory practices and avoid discriminatory measures that target one country’s exporters.</p>
5.	<p>4. Labor</p> <p>The IPEF presents an opportunity for like-minded partners to work together to develop a workforce that has the necessary digital skills for the 21st century. There is a growing need for countries to build out job-training programs that reflect the needs of the modern workforce.</p> <p>Possible avenues to explore with IPEF partners include: creating programs within economic development agencies and public universities to partner with the private sector to upskill students and workers including those in under-represented communities; working with institutions like the World Bank to establish global financing programs in collaboration with the private sector to establish funds for small business and entrepreneurs; digital apprenticeship programs that allow citizens of IPEF participants to train in other IPEF countries in partnership with companies; and joint scholarships for digital and STEM education courses throughout the Indo-Pacific region. Given the prevalence of many prestigious higher education institutions in IPEF countries including Singapore, these policies could produce positive externalities for IPEF members and their citizens alike.</p>
6.	<p>5. Environment</p> <p>The IPEF framework should enable companies operating throughout the region to achieve renewable energy goals. Participants should work to open</p>

²⁰ See https://www.ftc.gov/system/files/attachments/us-submissions-oecd-2010-present-other-international-competition-fora/oecd-competition_provisions_in_trade_agreements_us.pdf.

	<p>up markets in renewable energy, and reduce regulatory barriers for investment in renewable energy.</p> <p>However, in many markets, regulations favour legacy energy sources and serve as barriers to building new renewable energy projects, leaving companies with no choice but to use more carbon-intensive power sources. The IPEF presents an opportunity for governments to remove regulatory barriers to foreign investment and construction of renewable energy plants.</p> <p>Resource recovery of used technology products can also help in reaching climate-related goals. The use of raw materials recovered from these used products can help reduce the need for mining virgin materials, reduce waste, and can also enhance supply chain resiliency by capitalizing on the supply of critical materials already embedded in consumer devices. A current barrier to wider adoption of resource recovery practices is international rules that limit the cross-border movement of used consumer devices and the resources recovered from them. IPEF partners should use this platform to explore options to reduce these barriers, and explore possibilities around establishing “resources recovery lanes” among trusted partners.</p>
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C. Supply Chains Pillar

S/N	Feedback
1.	<p>The IPEF comes at a critical time as the COVID-19 pandemic has made clear the weakness and limitations of the current global supply chain.</p> <p>One area of focus for the IPEF discussions should be how to more efficiently get facilities back online that are necessary for global supply chains. When facilities that produce a key product or input are closed, the unavailability of key components curtails the production of downstream products and escalates delays. Lack of sufficient planning, poor organization, lack of technical expertise or relevant managerial capacity, and lack of resources are all reported barriers to re-opening these facilities.</p> <p>IPEF countries can address these challenges by (1) setting up an institutional framework within regional partners to rapidly identify and mitigate shutdowns of supply chain-critical facilities resulting from public health emergencies, natural disasters, or other external events; (2) providing capacity building to governments in the skills necessary to establish rapid-reaction mechanisms within their domestic frameworks; and (3) establishing a network and mechanism for the rapid deployment of material aid necessary to get facilities back online.</p>

(Please add additional rows as required.)

D. Fair Economy Pillar

S/N	Feedback
1.	<p>International trade and investment requires a consistent and predictable international tax system, and tax measures play a significant role in the global competitiveness of international companies.</p> <p>On October 8, 2021, the Statement on a Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalization of the Economy was released outlining the agreed-upon framework for global corporate tax reform.²¹ Pursuant to this commitment, all countries that have agreed to this framework cannot introduce any new unilateral measures and CCIA urges countries to abandon any national plans to implement national digital taxes and encourages policymakers to continue work on swift implementation of the global framework.</p> <p>IPEF partners should continue efforts to implement this multilateral solution, and should commit to avoid any digital taxation measures that are discriminatory in nature and contravene long-standing principles of international taxation.</p>

(Please add additional rows as required.)

²¹ OECD G20/Base Erosion and Profit Shifting Project, Statement on a Two-Pillar Solution to Address to the Tax Challenges Arising from the Digitalization of the Economy (Oct. 8, 2021), <https://www.oecd.org/tax/beps/statement-on-a-two-pillar-solution-to-address-the-tax-challenges-arising-from-the-digitalisation-of-the-economy-october-2021.pdf> (stating “The Multilateral Convention (MLC) will require all parties to remove all Digital Services Taxes and other relevant similar measures with respect to all companies, and to commit not to introduce such measures in the future. No newly enacted Digital Services Taxes or other relevant similar measures will be imposed on any company from 8 October 2021 and until the earlier of 31 December 2023 or the coming into force of the MLC. The modality for the removal of existing Digital Services Taxes and other relevant similar measures will be appropriately coordinated.”).