September 2026

G20: Top Digital Trade Barriers

Note: The below chart contains a non-exhaustive, edited list of trade barriers, and does not address all of CCIA's trade concerns in the listed countries.

Country / Region	Key Barriers & Measures	Trade commitments and quantification of harm
European Union	The **Digital Markets Act** imposes both onerous compliance requirements and unreasonable fines. The proposed **Cloud and AI Development Act** will shut US cloud providers out of segments of the European Public Cloud Market, with the potential for the measure to be expanded to private procurement.	The targeting of US firms implicates national treatment and MFN obligations. Fines, compliance costs, and foregone revenue affecting U.S. suppliers could surpass **$2 trillion** by 2030. CADA could put a market worth over **$10 billion** annually out of the reach of U.S. suppliers.
Brazil	Ex-ante **Fair Competition Act Bill 4.675/2025** borrowing elements of EU DMA.	Targets U.S. firms; potential fines of 20% group revenue fines. Puts over **$10 billion** in U.S. firms' revenue at risk
Canada	Undefined spending mandate under and other preferences for local content in the **Online Streaming Act**. Mandatory funding of Canadian News by designated online services through **Online News Act.**	Implicates USMCA national treatment and digital products rule; limits IP ownership; could cost U.S. industry $7B industry over 5 years Voluntary payments (CAD **$100 million** annually) or market exit have resulted.
Germany	8% revenue reinvestment under **MedienInvestVG**; Section 19a competition codes.	Implicates TRIPS Art. 3 national treatment through restrictions on IP ownership.

Country / Region	Key Barriers & Measures	Trade commitments and quantification of harm
		Spending mandate will cost U.S. firms up to **$2 billion** over 5 years.
India	Ex-ante Draft **Digital Competition Bill**, with proposed India revenues thresholds ($3.6-6 B) targeting U.S. firms.	Targets U.S. firms while largely shielding local competitors, implicating national treatment. Impedes access to a market worth over **$30 billion** (cloud and digital advertising)
Indonesia	Draft **Copyright Amendment** (Articles 29/30); **POJK.03/2016** setting restrictions on financial services use of cloud.	Inconsistent with US-Indonesia ART Annex III; unworkable AI collection mandates. Inconsistent with Indonesia's WTO Computer Services commitments.
South Korea	**N2SF** (formerly **CSAP**) which effectively shuts US firms out of Korea's public procurement market for cloud services. Proposed bills on **Platform Fairness** and **Mobile OS Interoperability**.	Imposition of N2SF conflicts with South Korean obligations under KORUS and WTO's GPA. Blocks access to a **$60 billion** market. Implicates national treatment provisions of KORUS. These bills would diminish access to app and e-commerce markets over **$200 billion**

Overview of Barriers

European Union

- **Digital Markets Act**: Imposes aggressive business limitations on US companies and forces the transfer of US data and trade secrets to foreign rivals, with fines up to 20% of a company's global revenue. For more information on how the Digital Markets Act is placing disproportionate compliance burdens on US companies, see CCIA's explainer here.

- **Proposed Cloud and AI Development Act (CADA) and Public Procurement Directives:** Introduces potential discrimination through sovereignty requirements that could exclude US cloud and ICT providers from the market.

Australia

- **News Media Bargaining Incentive:** On August 26 Australia's News Media Bargaining Incentive[1] came into force, imposing a 2.75% charge on revenues of certain large social media and search services while allowing qualifying payments to Australian news businesses to offset that liability. See CCIA's 2 pager on the News Media Bargaining Incentive here.
- **Online Safety Act:** Passed in 2025, this expansive and rushed legislation raises concerns about unfairly targeting US companies due to its extraterritorial reach, vague definitions of harmful content, and lack of transparency in content removal requests. The Social Media Minimum Age Act requires platforms to take steps to prevent users under 16 from having accounts, negatively impacting U.S. service providers and raising human rights issues. It imposes significant compliance costs, complex technical challenges for age verification, and the threat of fines up to AUD $49.5 million for non-compliance. See CCIA's analysis of the Social Media Minimum Age Act here. New proposed amendments would impose further, highly prescriptive requirements on service suppliers relating to product design.

Brazil

- **Ex-Ante Competition Legislation:** Introduced by President Lula's administration and being fast-tracked though Congress, Brazil's proposed two-tiered Digital Markets Act (DMA) bill would establish a competition regulatory system for the digital sector, allowing the Brazilian competition authority to designate companies as "systemically relevant" for 10 years, which triggers administrative obligations and enables specific proceedings against individual products or services. Although it will cover non-US firms, Brazilian firms are largely spared and U.S firms appear disproportionately affected. For more information see CCIA's explainer on the proposed Digital Markets Bill here.
- **Video on Demand (VOD) Bill:** Disproportionately targets US video platforms while favoring Brazilian broadcasters, and imposes platform-wide tax to fund Brazilian content development. See CCIA's analysis of the amendments to the VOD Bill here.

- Weakening of **Marco Civil's** liability protections: After a 2025 decision of the Supreme Court significantly changing platform liability, rules were introduced to place online services under a broad notice-and-takedown regime for illegal content, presumed liability for ads, and a new "duty of care" for a closed list of crimes. See this analysis for more information.

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[1] See the News Media Bargaining (Administration) Act 2026 here: https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bId=r7525; see the News Media Bargaining Charge Act 2026 here: https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bId=r7524

- **Proposed AI Bill:** Includes unbalanced copyright provisions requiring mandatory payment and broad transparency requirements that could block US companies from conducting AI training in Brazil and accessing the market.
- **Ex-Ante Competition Legislation:** Long under consideration, a proposed Digital Competition Regime modeled on EU Digital Markets Act would target US companies with business restrictions and heavy fines. CCIA analysis is available here.

Canada

- **Online News Act:** Since passage in 2023, Canada's Online News Act has forced the transfer of hundreds of millions in revenue from the one targeted US company to large Canadian news publishers. One other U.S. firm exited the news market. CCIA published a white paper on how the Online News Act conflicts with Canada's USMCA commitments.
- **Online Streaming Act (Bill C-11):** Requires US services hosting streaming content to fund Canadian content and give preferential treatment to Canadian creators, in a manner inconsistent with several USMCA rules. Although the regime is still under development and the initial 5% fees suspended last June, the broader goal of achieving a 15% contribution (including through investment) has not yet been formally abandoned. Absent repeal of the law, U.S. firms will face significant burdens and uncertainty. See CCIA's summary here, and statement on the initial suspension.

France

- **Digital Services Tax:** Since January 2019, France has applied a 3% digital services tax on companies with revenue over €750 million global revenue or 25 million French revenue, targeting advertising, sale of user data, and digital intermediation.
- **SecNumCloud**, restricting access to the public cloud computing market. This standard, introduced in 2022, effectively bans U.S. firms from any public tenders.
- See CCIA's more detailed overview of the DST and other key digital trade barriers here.

Germany

- **Ex-Ante Competition Legislation:** The German Competition Act is being applied on a global basis solely against US companies, and imposes sweeping restrictions on conduct of US companies before it becomes a concern under conventional competition law. See CCIA's two-pager on the Competition Act here.
- **Online Video Investment Obligations**: this year, Germany introduced a measure, scheduled to take effect in 2027, that targets U.S. online streaming companies with an obligation to invest an estimated $2 billion annually in local production, and imposes draconian restrictions on control of the related intellectual property. The latter element may be inconsistent with Germany's WTO TRIPS obligations. CCIA analysis is here.

India

- **Ex-Ante Competition Legislation:** Proposed digital competition framework adopts EU Digital Markets Act-style regulations and imposes aggressive restrictions primarily on US companies. See CCIA's overview of the proposed legislation here.
- **Data Localization:** US cloud providers are severely hindered from serving the Indian market by numerous measures, including data localization mandates in the geospatial, financial, and public sector, and ambiguous local content requirements in public procurement rules.
- **Platform Regulation:** IT Act and Intermediary Liability Guidelines expose primarily US companies to extensive audit and other regulatory requirements, hefty fines, unreasonable content takedown timeframes, and potential criminal liability.

Indonesia

- **Forced Revenue Transfers for News:** In 2024 Indonesia adopted a regulation that will require social media and search operators to pay news publishers to feature media content on their platforms, a requirement reinforced through provisions of the recently amended Copyright Law. Indonesia agreed not to impose digital services or similar taxes in its ARTS agreement, which these measures contravene.[2] See CCIA's report on barriers to US digital services suppliers in Indonesia here, and analysis of the amended Copyright Law here.

Italy

- **Digital Services Tax:** Since 2018, Italy has imposed its *imposta sui servizi digitali* at a flat rate of 3% on revenues from targeted digital advertising, multi sided digital platforms, and the transmission of user data collected from digital platforms, targeting U.S. firms. See CCIA's most recent assessment of the cost of the Italian DST here.
- **Low-Value Parcel Handling Fee:** Italy's 2026 Budget Law, adopted in December 2025, introduced a €2 handling fee on low-value parcels (up to €150) imported from non-EU countries. While the measure is already in force, its application has been repeatedly postponed and the fee has never been effectively collected. A decree published on September 17 further postponed its application from October 1 to December 1, 2026. The Government continues to pursue successive postponements rather than repealing the measure, retaining a national charge that could add a country-specific layer of costs and complexity for cross-border e-commerce alongside EU-level measures on low-value imports.

Japan

- **Mobile Software Competition Act:** Inspired by the EU's Digital Markets Act, the MSCA places extensive restrictions on only US providers of mobile and search services in Japan, while exempting rivals from Japan and China. For more information, see CCIA's Asia overview here.

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2 https://ustr.gov/sites/default/files/files/Press/Releases/2026/02.19.26%20US-IDN%20ART%20Full%20Agreement%20-%20US%20Final%20for%20Website%20sanitized.pdf

South Africa

- **Forced Revenue Transfers for News:** the Media and Digital Platforms Inquiry has recommended that US companies give preferential treatment to South African publishers and transfer tens of millions of dollars to a South African media fund. Although still voluntary, the spectre of mandatory requirements remains.

South Korea

- **Online Platform Bills and Targeted Competition Enforcement:** National Assembly members, with the government's support are pursuing several platform regulation bills modeled on the EU's Digital Markets Act that would impose extensive restrictions on US digital companies, including service fee price regulation. The Korea Fair Trade Commission continues to pursue aggressive competition enforcement with threats of criminal prosecution to disproportionately target US companies and disadvantage them against local rivals. For more information, see CCIA's overview of the proposed Online Platform Fairness Bill here.
- **Proposed Mobile OS Interoperability bill:** introduced in May of this year, this bill purports to address "self-preferncing" on app stores through an amendment to the Telecommunications Business Act. As another example of unjustified ex-ante regulation targeting U.S. firms, this proposal would diminish U.S. access to a market Korea estimates worth about $6 billion.
- **N2SF**: The N2SF, formerly the Cloud Security Assurance Program severely restricts US cloud service providers' access to the South Korean public cloud market. The N2SF will classify workloads at three levels: Open, Sensitive, and Confidential. Under CSAP, US CSPs have been certified as eligible to bid on public sector contracts at the "low" data classification andhave have yet to win any significant bids. CCIA comments on the predecessor regime (key elements of which persist) are here.
- **AI Basic Law:** Went into effect in January 2026 but guidance remains sparse. Borrows elements from the EU AI Act, with provisions that disproportionately impact US companies and not Korean or Chinese competitors. Includes onerous compliance and reporting requirements that would require US companies to submit sensitive information on advanced AI models to the Korean government, as well as impractical and onerous AI labelling requirements. See CCIA's comments on the law here.
- **Network Act:** Recent DSA-like amendments to Korea's Network Act risk stifling free speech by requiring American online platforms to remove broad swaths of content deemed to be "false" or "manipulated," including political speech. US service providers have also come under heightened public scrutiny vis-a-vis their local competitors on content moderation issues, including being summoned for National Assembly hearings. See CCIA's analysis of the amendments here.
- **Data Localization:** Numerous regulations, including Indonesia's electronic systems operator regulations, National Data Center initiative, and financial services regulations, prevent data from being hosted offshore by US cloud providers seeking to serve financial services and public sector entities. Introduces rigid consent requirements for

cross-border data flows and strict Data Protection Impact Assessments (DPIA). Non-compliance carries domain blocking and administrative fines.

- **Platform Regulation:** Kominfo Regulation no. 5/2020 exposes primarily US digital platforms to government requests for data and systems access, operationally challenging content removal timelines (as short as 4 hours), and severe penalties including fines and shutdown of the service.

Turkiye

- **Digital Services Tax:** Turkiye currently applies a 5% tax on gross revenues derived from digital advertising, online content sales, digital platform services, and similar activities that generate revenue. This is down from the previous 7.5% rate, and a further decline to 2.5% next year is planned, but its elimination is not envisaged. See CCIA's two pager for a full list of barriers to US digital service suppliers in Turkiye here.
- **Ex-Ante Competition Legislation:** A proposed amendment to the Turkish Competition Act would impose EU-style restrictions and forced data sharing requirements primarily on US companies. Discussions regarding this DMA-style law in Türkiye are currently paused.Meanwhile, Turkish competition authorities continue to actively conduct dawn raids and aggressive investigations into U.S. digital service suppliers..
- **Internet Law:** Turkiye's Internet Regulatory Authority is proposing amendments to Internet Law No. 5651 that aim to increase control over US platforms, including potential bandwidth throttling for US services and revenue-based fines for violations of vague speech-related requirements. Separately, Turkiye is also developing a U15 social media ban, inspired by Australia, which also aims to restrict the gaming industry, but draft legislation has yet to be released.

United Kingdom

- **Digital Services Tax:** Since 2020, the United Kingdom has levied a 2% tax on the revenues of search engines, social media services, and online marketplaces which involve interaction withUK users. To date, the UK has been the world's top recipient of revenues from such extractive measures. See CCIA's most recent assessment of the cost of the United Kingdom's DST here.
- **Ex-Ante Competition Legislation:** The new Digital Markets Unit regime targets US tech companies, imposes aggressive 'conduct requirements' for designated companies, and authorizes fines of up to 10% of global revenue. For more information, see CCIA's recommendations to reduce the United Kingdom's barriers to US digital services suppliers here.