

By email

Ref.: BEUC-X-2025-086

1 October 2025

Subject: EP should not give consent to the EU-Singapore Digital Trade Agreement in its current form

Dear Members of the INTA committee,

In July 2024, the Commission concluded negotiations with Singapore on a Digital Trade Agreement (DTA), the first of its kind. While some of the rules could enhance consumer trust online, BEUC, together with ETUC and EDRI, has [highlighted](#) that other elements fall short of established EU standards and could negatively impact the ability of the EU to enforce its digital laws. Our concerns are shared by the European Data Protection Supervisor, which [recommends](#) amending the digital trade agreement to avoid creating, on the one hand, friction with the EU data protection legal framework, and on the other, legal uncertainty.

Based on [our position](#), here is the summary of **our key concerns**:

1. Unintended obstacles to AI enforcement

We are concerned that the way the agreement has been drafted may limit regulatory bodies' ability to ensure that companies comply with laws such as the AI Act. Without easy access to source code, investigations into fraudulent practices and security vulnerabilities could be obstructed, compromising consumer safety and trust. Companies already have protections for their intellectual property and trade secrets. This new layer of protection for companies could come at the expense of the enforcement of EU law and is therefore not proportionate to the intended goal.

2. Data protection and privacy not fully preserved

The provisions on cross-border data flows create legal uncertainty and do not sufficiently preserve the EU's ability to enforce its high standards of data protection. The Commission should have refrained from including this clause and instead negotiated an adequacy decision that would enable digital trade without compromising the EU's ability to pursue its policy objectives through regulation.

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3. Setting the wrong precedent for future agreements

The Commission is envisaging more engagement with Southeast Asian countries that are part of the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). In this context, the EU has recently concluded agreements with Korea and Indonesia and is negotiating with countries such as Thailand and the Philippines. We welcome the objective of finding trusted partners in this complex geopolitical environment. Yet, we underline that agreements such as this one with Singapore do not provide a good enough basis to bring benefits to consumers. Future agreements should focus on online consumer trust and safe payments, and refrain from including risky clauses on source code and data flows.

In conclusion, while the goal of facilitating digital trade and cooperation with Singapore is laudable, the present form of the agreement carries **more risks than benefits** for EU consumers. Therefore, we recommend **not to give consent** to the agreement in its current form and to encourage the Commission to make changes towards a safer deal for EU citizens.

Thank you for your attention to this important matter. We remain at your disposal to provide further information.

Yours sincerely,

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Head of International Affairs