



15 JULY 2020

# DIGITALEUROPE priorities for a free trade agreement between the United Kingdom and the European Union

DIGITALEUROPE calls upon the United Kingdom and the European Union to reach a comprehensive free trade agreement which preserves business continuity, as negotiations progress during the transition period. To facilitate this objective, we outline our recommendations on the approach and the key priorities needed to achieve the best possible outcome.

## Executive Summary

The UK left the EU on 31 January, beginning a transition period until 31 December this year. In the limited time that remains, both partners have committed to engage in best efforts to reach a comprehensive free trade agreement, with negotiating objectives set by both sides in February 2020.

Considering this challenging timeline, EU and UK businesses are extremely concerned as to the difficulties that seem certain to emerge for trade between the two partners. DIGITALEUROPE calls upon both parties to observe a golden rule of business continuity as negotiations progress.

This will necessitate an approach that is cooperative, open to external input and expertise, and allowing for a sufficient implementation period.

To achieve the best possible outcome, the agreement needs to encompass a number of key priorities (outlined in this paper), including tariff- and quota-free trade insofar as possible, simple and liberal rules of origin, and the preservation of data flows. The latter is also addressed in a separate document on data adequacy.

In the annexes, we provide further detail on the priority areas, and highlight means for trade facilitation to ensure business continuity.

## Contents

▪ About our sector .....	2
▪ Our approach to the negotiations .....	3
▪ Key priorities for an EU-UK Agreement .....	4
▪ Annex 1: Detailed priorities .....	7
▪ Annex 2: Ensuring business continuity through trade facilitation .....	15

## About our sector

**Digital is a mix:** The tech sector comprises a rich mix of hardware, software and services from microbusinesses to global platforms. Across the EU and the UK, digital transformation is a societal phenomenon that sees our sector contributing to everything from increased industrial productivity to the green transition.

**Services:** Out of 6.5 million jobs in our sector, 80% are in services. These account for well over 90% of added value in the EU ICT sector, and for 96% of UK digital business. UK exports of telecommunications, computer and information services to the EU total approximately £10 billion, around half of global UK services exports of this type. The UK is also the top destination for EU exports in services.

**Complex supply chains:** Companies can be in simple supply chains of two or highly complex networks of many organisations, across Europe and beyond. Overall, 49% of inputs of goods and services to the UK's ICT-producing sectors are imported, compared to 28% for the economy as a whole. Of these the EU made up 52% of goods inputs and 49% of services inputs.

**Highly regulated market:** All products currently placed on the EU market, as well as services delivered to it, are subject to a wide range of regulations. Up until this point UK services and products have automatically complied, through the application of the same rules. Now that the UK has left the EU, this automatic entitlement will end, with checks and certifications required. Many UK and EU ICT products have supply and distribution chains which cross Ireland and Northern Ireland, meaning the clear and timely implementation of the Northern Ireland protocol is essential for the distribution of products.

**Innovation is a crucial driver of growth in the sector:** The ICT sector has a long history of company involvement in EU research and innovation

programmes, such as Horizon 2020, creating innovation ecosystems for collaboration between skilled researchers in large industry, SMEs, research institutes and academia across and beyond European borders.

## Our approach to the negotiations

**Input:** DIGITALEUROPE welcomes the publication of the negotiating objectives of both sides and the commencement of negotiations aiming to conclude an agreement before the end of the transition period. DIGITALEUROPE also welcomes any opportunity to provide input where the key areas of concern lie for the digital and tech sectors.

**Expertise at disposal:** Our members are keen to lend our extensive expertise of navigating global supply chains, customs systems and regulatory frameworks to support the conclusion of the best agreement possible within the scope of the UK and EU negotiating objectives.

The digital and tech sector's key priorities centre around the effective management and reduction of non-tariff barriers, the minimisation of customs delays, managing regulatory divergence, the mobility of people for business, research and other purposes and supporting the continued free flow of personal and non-personal data.

**Implementation period:** As the UK will be leaving the Single Market, businesses will face additional import and export requirements and paperwork, irrespective of the outcome. To allow businesses time to prepare to manage these additional requirements and reduce the impact of new trade barriers, the two parties should seek to negotiate an implementation period that provides sufficient time for businesses to prepare. This period should provide sufficient lead-in time for businesses to enact the system and process changes required to support the smooth implementation of the future relationship.

Following consultation with members, it appears unlikely that adequate preparations can be made within the transition period alone, making such an implementation more essential than ever. The necessary length of this period will depend on the extent of businesses' preparation during the transition period as well as the detail of technical support offered by the UK and EU during this period. As such, any implementation period should be commensurate with the level of preparations that need to be made and could be applied sector by sector. Further details on this can be found in Annex 2 below.

**Call for continued cooperation:** The UK as a member of the EU has enjoyed a strong relationship with the 27 other Member States with collaboration between citizens, business and policy makers helping to shape the success of the

European tech sector. While the UK cannot enjoy the same depth of relationship with the remaining 27 member states through the type of deal being pursued, DIGITALEUROPE wishes to see the collaboration which has strengthened both sides upheld to the greatest degree possible.

**Multiple processes:** In this document DIGITALEUROPE sets out our position on the priorities needed to achieve the best possible outcome. In a separate document, DIGITALEUROPE outlines its position on **data adequacy**, a distinct process, separate from the negotiations over the free trade agreement.

Elsewhere, we call on the parties to support the **continuation of no roaming charges** between the UK and the EU, by reaching an agreement on international mobile roaming that will help facilitate market based solutions to prevent the return of roaming fees. This approach should seek to support competition and transparency within and between the respective markets of the UK and the EU. The EU Japan Agreement provides a useful precedent for the negotiations which promotes transparency, competition and consumer choice.

The UK has spelled out in its negotiating objectives a willingness to enter into relationships in line with non-EU Member State participation rules across a number of **EU programmes**<sup>1</sup> as well as supporting service access agreements for other programmes<sup>2</sup>. DIGITALEUROPE encourages both parties to support such applications, respecting the UK preference for participation on a third country basis. The EU should however examine how any partnerships can be deepened after the conclusion of negotiations on the agreement.

**Best possible post-Brexit relationship:** Over the course of the negotiations DIGITALEUROPE and our members are open and willing to support both parties agree the best possible relationship for the digital and tech sectors.

## Key priorities for an EU-UK Agreement

### Data protection

- Though a separate process, we call upon both sides to pursue their best efforts to facilitate a **positive adequacy decision** by December 2020.

---

<sup>1</sup> The UK has provided the examples of Horizon Europe, Euratom Research and Training, and Copernicus.

<sup>2</sup> The UK has named EU Space Surveillance and Tracking, and the European Geostationary Navigation Overlay Service. It has further suggested it will consider elements of Erasmus+ on a time-limited basis.

- We encourage both sides to create a **permanent forum for dialogue, cooperation and the sharing of best practices**.
- We urge both parties to commit to the **mutual recognition of each other's alternative transfer mechanisms** so that in the event of an adequacy decision not being reached, or not being maintained, there is a commitment to recognised contractual alternative transfer mechanisms within the FTA upon which to fall back.

### Tariff-free and quota-free trade, and simple rules of origin

- We call upon both parties to conclude an Agreement that ensures **tariff-free, quota-free trade**, including additional commitments to smooth, frictionless trade, and to facilitate the trade in goods over time.
- We urge both parties to negotiate **simple, liberal and predictable rules of origin** similar to the most recent free trade agreements of the European Union, including the proposed revised pan-Euro-Mediterranean Convention allowing for the use of 50% non-originating material.
- We further request that the parties investigate **whether accumulation schemes can be included in other trade agreements**, particularly with third countries with high volumes of bilateral trade with the EU and the UK. These should ensure that the UK share can also continue to be included in the determination of preferential origin.
- While supporting the right to regulatory autonomy, we encourage the establishment of **permanent fora and mechanisms to support regulatory cooperation**, as key enablers of frictionless trade in the longer term.

### Services and Investment

- We suggest that the Agreement **covers all modes of supply** and covers sectors such as professional and business services, telecommunications services, courier and postal services, distribution services, environmental services, financial services, tourism related services and transport services. A negative list approach should be taken to such schedules.
- We ask that the Agreement supports regulatory cooperation, non-discrimination, mobility of professionals for work purposes, and frameworks for the **mutual recognition** of qualifications.

## Digital Trade

- We call for an Agreement that advances upon the **positions and principles within the EU-Japan and CETA agreements** as well as advanced anti-data localisation principles drawn from international best practice.
- We encourage the UK and EU to agree **new provisions for the free flow of non-personal data**. The parties should seek to agree provisions equivalent to those of the existing EU regulation on the free flow of non-personal data. Any new agreement should prioritise anti-localisation, non-discrimination and uphold good data protection and public procurement practice.

## Intellectual Property

- We encourage both parties to seek to secure **the maximum possible mutual recognition of each other's IP systems** as well as a high level of information sharing, judicial and regulatory cooperation to underpin future innovation.

## Public Procurement

- We urge both parties to support and build upon the UK's envisaged accession to the WTO **Government Procurement Agreement (GPA)**.
- We recommend an Agreement that seeks to allow for **competitive procurement processes that do not discriminate against extra-territorial business**, other than in specifically spelled out areas where there are justifiable public policy reasons for doing so, for example in relation to national security and defence.

## SMEs

- We support the inclusion of **a specific SMEs chapter** with commitments from both parties to provide support to their respective SMEs allowing them to take advantage of the agreement.

## Mobility

- We advise that **commitments to mode 4 be horizontal across the Agreement**, going beyond the provisions in the CETA and EU-Japan agreements, and improving coverage in research, study, and other forms

of temporary movement. There should also be a sufficient level of social security and healthcare cooperation commensurate with the depth of the final mobility arrangements.

FOR MORE INFORMATION, PLEASE CONTACT:



**Barry McKeon**

**Senior Policy Manager – Trade and Competition**

[barry.mckeon@digitaleurope.org](mailto:barry.mckeon@digitaleurope.org)

---

## Annex 1 – Detailed priorities

In this section, we provide further details on the priorities outlined above.

### Data protection

Both the EU and the UK have noted their respect for the unilateral nature of the data adequacy assessment and decision which is to be undertaken by the European Commission.

The Political Declaration commits both sides to pursue their best efforts to facilitate a positive adequacy decision by December 2020. In a separate document, DIGITALEUROPE spells out its support for a positive conclusion of the process and the granting of data adequacy to the UK by the end of December 2020.

Beyond the adequacy process the European Council negotiating objectives highlight the importance of personal data flows for achieving a high level of ambition for the conclusion of agreements on law enforcement and judicial cooperation in criminal matters. DIGITALEUROPE supports both parties exploring commitments and partnerships within the free trade negotiations that would support the granting of adequacy as well as achieving and maintaining ambitious agreements on security and judicial cooperation.

In their negotiating objectives the UK has stated that it wishes to seek appropriate arrangements for continued cooperation between the UK's data protection authority, the Information Commissioner's Office (ICO) and EU Member States data protection authorities.

This is to be welcomed and we encourage both sides to create a permanent forum for dialogue, cooperation and the sharing of best practices. This is while noting that as part of EU withdrawal the UK's Information Commissioners Office is no longer a part of the European Data Protection Board (EDPB).

The negotiating objectives of both sides note that the UK will have an independent data protection regime. Due to the proximity and intensity of trade the UK and the EU should maintain a permanent forum to manage the relationship for personal data transfers, supporting the commitments of the UK Government to maintain high equivalent standards in data protection and the free flow of personal data between the UK and the EU.

DIGITALEUROPE also notes that – as set out in the Political Declaration and Withdrawal Agreement – the UK will establish its own international transfers regime.



The UK and the EU should also seek to achieve a commitment to the mutual recognition of each other's alternative transfer mechanisms so that in the event of an adequacy decision not being reached, or not being maintained, there is a commitment to recognised contractual alternative transfer mechanisms within the FTA upon which to fall back. This will be of vital importance for both sides and will help mitigate disruptions to business.

DIGITALEUROPE calls on the UK Government to establish an effective, high standard and transparent regime that supports outbound transfers of personal data from the UK to the EU, ensuring that alongside data adequacy these two systems support the free flow of personal data between the two parties.

## **Tariff-free and quota-free trade, and simple rules of origin**

DIGITALEUROPE urges both parties to seek the conclusion of a deal based on tariff free, quota free trade, including additional commitments to smooth, frictionless trade, and to facilitate the trade in goods over time.

Such a deal would significantly reduce business cost by greatly simplifying processes as well as making a significant contribution to the better management of the Northern Ireland protocol. Regulatory alignment to the maximum extent possible would have similar effects.

While both parties had previously committed to seeking a tariff free, quota free trade agreement, a no-deal scenario at the end of the year would lead to new tariffs on certain ICT products coming from the European Union. For example, the recently published UK Global Tariff forecasts a 14% tariff on the import of TVs. As the EU is home to many companies' manufacturing plants for IT products, these tariffs would put them at a competitive disadvantage in the long run, compared with companies producing in a country with whom the UK will have a tariff-free trade deal. In addition, DIGITALEUROPE calls for the development of simple, liberal and predictable rules of origin similar to the most recent free trade agreements of the European Union, including the proposed revised pan-Euro-Mediterranean Convention allowing for the use of 50% non-originating material.

DIGITALEUROPE also requests to investigate whether accumulation schemes can be included in other trade agreements. These should ensure that the UK share can also continue to be included in the determination of preferential origin. Moreover, when determining such schemes, the complexity of value chains in sectors such as ours should be taken into account.

Further, both parties have made commitments that if an agreement can be made then they should seek to enact provisions to improve transparency and information sharing, and smooth customs procedures, seeking to go beyond WTO agreements such as the Technical Barriers to Trade (TBT) Agreement as found in the existing EU deals with Canada and Japan.

Frictionless trade also draws on and encompasses regulatory standards. We recognise that full continued regulatory alignment is not possible as the UK Government has ruled this out. However, considering the EU and the UK are starting from a point of convergence and continued shared values around high levels of protection, DIGITALEUROPE encourages both parties to establish permanent fora and mechanisms to support regulatory cooperation.

The aim of such fora and mechanisms should be to manage and assess the materiality of potential future regulatory divergences and seek to manage any subsequent consequences should either side diverge from the existing common standards.

DIGITALEUROPE notes that members value the consistency and efficiency created by the Single Market and regulatory alignment and believes that deep regulatory cooperation should continue across all industrial sectors, including ICT Products. The objective of such efforts should be to ensure equivalent high standards, aiming for the mutual recognition of standards and conformity assessment.

## **Services and Investment**

Both parties have set out ambitions to deliver a level of liberalisation in trade in services well beyond WTO levels using existing EU free trade agreements as a basis.

DIGITALEUROPE believes that any agreement should cover all modes of supply and cover sectors such as professional and business services, telecommunications services, courier and postal services, distribution services, environmental services, financial services, tourism related services and transport services.

The UK Government has set out four principles for this chapter, i.e. (1) no limits on market access, (2) reciprocal non-discriminatory national treatment, (3) limitation of mode 3 (the requirement for a national presence) and (4) most favoured nation application so the agreement can be updated overtime to reflect any new EU FTAs which go beyond the provisions agreed in this negotiation.

DIGITALEUROPE believes these principles offer a good basis for approaching the Services and Investment chapter, and in particular supports efforts to ensure durable and reciprocal application of the terms of the agreement.

To best manage the future relationship agreement and create an impetus in favour of reducing barriers to trade, DIGITALEUROPE believes that any agreement should include a specific commitment from both parties to undertake best efforts to improve trade facilitation in services as well as undertaking best efforts for the reduction of non-tariff barriers over time.

To support this the schedule for the agreement should follow the negative list approach in recognition of the integration of the two markets and to guard against unintended restrictions in future.

Any agreement should seek to support non-discrimination, mobility of professionals for work purposes, frameworks for the mutual recognition of qualifications as well as provisions to promote regulatory cooperation. The parties should also commit to providing fair and equal access to public telecommunication networks and services for each other's suppliers, as well as undertaking efforts to address anticompetitive practices.

The agreement should also include a commitment to establish a permanent framework for voluntary regulatory cooperation in areas of interest to business. This should include first and foremost, but not be limited to, continued membership of the British Standards Institution (BSI) in CEN and CENELEC. This framework should include information sharing, routes for regulatory dialogue and the sharing of best practice across services sectors.

DIGITALEUROPE supports the financial equivalency processes. Cooperation in financial services should be underpinned by these assessments as set out in the political declaration. Beyond this, both parties should support efforts for cooperation between regulators and professional bodies to reduce non-tariff barriers and facilitate cooperation between industry, regulators and supervising authorities.

## Digital Trade

The EU and the UK have made similar commitments to digital trade cooperation with both parties seeking to agree ambitious terms to reduce barriers to trade via electronic means. The parties have also set out that any agreement should ensure an open, secure and trustworthy online environment for businesses and consumers, while respecting the EU's personal data protection rules.

DIGITALEUROPE wishes to see the UK and the EU set a new gold standard for EU digital trade agreements. This means seeking to advance upon the positions principles within the EU-Japan and CETA agreements as well as advanced anti-data localisation principles drawn from international best practice.

Due to the evolving nature of digital trade the UK and the EU should seek to include a ratchet clause allowing for the updating of the agreement over time as EU digital trade provisions advance.

The UK and the EU should also set out commitments to work constructively bilaterally and in multilateral fora to advance positive digital trade principles such as opposing data localisation, opposition to the forced disclosure of source codes, supporting a permanent ban on tariffs on e-commerce and electronic transfers and to support the digitisation of trade processes.

The EU-UK digital trade agreement should also seek to embed a digital by default approach favouring the use of e-signatures, electronic forms, declarations and other processes where applicable. This should extend to the use of electronic communications for import and export processes as well as other regulatory certifications across the breadth of the free trade agreement.

The agreement should provide for consumer protection online and on unsolicited direct marketing communication. This should be supported by agreements and dialogue on consumer redress.

Both parties should also commit close collaboration and the development of joint approaches to stimulate e-commerce. Elements of this should draw upon international best practice and ongoing discussions, for example negotiations on the WTO's Joint Statement Initiative on E-Commerce.

The UK and EU will also need to agree new provisions for the free flow of non-personal data. The parties should seek to agree provisions equivalent to those of the existing EU regulation on the free flow of non-personal data. Any new agreement should prioritise anti-localisation, non-discrimination and uphold good data protection and public procurement practice.

## **Intellectual Property**

Both parties have made commitments to provide for the protection and enforcement of intellectual property rights, going beyond the standards of the WTO Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS) and the World Intellectual Property Organization (WIPO) conventions.

The UK position has indicated an openness to discussing mechanisms for cooperation and exchange of information on IP issues.

The UK and EU IP systems are both robust, effectively enforced and provide a strong basis for investment, supporting entrepreneurs and SMEs as well as global innovation and value chains. DIGITALEUROPE encourages both parties to seek to secure the maximum possible mutual recognition of each party's IP systems as well as a high level of information sharing, judicial and regulatory cooperation to underpin future innovation.

## **Public Procurement**

DIGITALEUROPE supports the position laid out in the EU negotiating objectives that the partnership should support and build upon the UK's envisaged accession to the WTO Government Procurement Agreement (GPA).

GPA standards provide an effective basis which can then be built upon to improve transparency, increase market opportunities and more effective oversight and remedy process. The UK and the EU should seek to use the provisions within CETA as a basis to be built upon to reach an agreement which accounts for the higher level of integration between the parties. The envisaged agreement between the two parties should further seek to allow for competitive procurement processes that do not discriminate against extra-territorial business, other than in specifically spelled out areas where there are justifiable public policy reasons for doing so, for example in relation to national security and defence.

The public procurement agreement should also seek to allow for the sharing of non-personal data on a non-discriminatory basis. This should be agreed using the existing EU regulation on the free flow of non-personal data as a template.

## **SMEs**

DIGITALEUROPE supports the position within the EU negotiating objectives for a specific SMEs chapter with commitments from both parties to provide support to their respective SMEs allowing them to take advantage of the agreement. This support should include providing access to useful information on rules, regulations and procedures related to doing business, including on public procurement.

## Mobility

The mobility of workers, researchers, students and other persons has been an incredibly valuable part of the UK and EU 27 partnership while the UK was a member of the EU. Continuing this is of vital importance. Any agreement must be reciprocal; however, it must not impinge on the respective parties' rules for long term residency.

Both parties cite existing EU precedent for the agreement, building on the Mode 4 commitments in CETA and the EU-Japan EPA. These commitments cover short-term business visitors, including for establishment purposes; intra-company transferees; contractual service suppliers; and independent (i.e. self-employed) professionals and investors.

Commitments to mode 4 should be horizontal across the agreement. There should also be a sufficient level of social security and healthcare cooperation commensurate with the depth of the final mobility arrangements.

DIGITALEUROPE supports this approach, however we believe that both sides should seek where possible to extend these provisions, by seeking to go beyond the mode-4 mobility provisions within CETA and EU-Japan as well as improving coverage in research, study and other forms of temporary movement.

The agreement should also facilitate a framework for the mutual recognition of professional qualifications. This framework should establish dialogue between UK authorities and the relevant authorities of EU member states in this area across all relevant services sectors. Both parties should examine the possibility of a bridging mechanism to allow the time needed for recognition processes to take place.

DIGITALEUROPE also encourages both sides to seek commitments between the UK and Member States to engage bilaterally to improve the processes for issuing visas and reducing other forms of paperwork.

## ○ Annex 2 – Ensuring business continuity through trade facilitation

As the UK will be leaving the Single Market EU businesses will face additional import and export requirements and paperwork, irrespective of the outcome. To allow business time to prepare to manage these additional requirements and reduce the impact of new trade barriers the two parties should seek to negotiate an implementation period that provides sufficient time for business preparations.

### 1. Procedural Concerns

To mitigate the impact of the customs procedures between the EU and UK, the framework for the future EU-UK relationship should **facilitate the efficient movement of goods between the EU and UK**. This would require self-assessment and simplified customs procedures, such as:

- » self-assessment of goods, enabling importers to replace individual declarations with a system of periodic returns;
- » advance electronic submission and processing of import documentation and other information, including manifests, before physical arrival of goods;
- » simplified import declarations and procedures and automatic release, based on Authorized Economic Operator (AEO) status;
- » mutual recognition of AEO status;
- » mutual recognition of conformity assessments;
- » transparent and non-discriminatory fees, charges, and customs procedures;
- » advance rulings relating to binding tariff information, or decisions relating to binding origin information;
- » the establishment of a single window in the EU and the UK, enabling traders to submit documentation and data required for import, export, or transit to a single-entry point;
- » expedited customs procedures for express delivery shipments;
- » the establishment (at least on an interim basis) of dedicated lanes for critical goods and components in both the EU and the UK;

- » deferred tax and duties payments, with payment at quarterly intervals or longer;
- » identical data set requirements for customs declarations in UK and EU;
- » acceptance of the export declaration in the EU as the import declaration in the UK, and vice-versa;
- » acceptance and validation by EU customs authorities of UK customs declarations, releasing the goods and informing UK customs, and vice versa;
- » simplified rules of origin and accumulation;
- » remote release: by separating the flow of the physical goods and the data linked to the goods, the goods can be cleared at the point of arrival without physically presenting the goods to the customs office of destination.

Furthermore, any product changes need a sufficient 'compliance window' from the point the exact requirement is published and clearly defined, to the date when industry must implement the requirement.

- » For administrative changes such as DoC update, importer address update, manufacturers address update (etc), a minimum notice period of 12 months should be provided.
- » For changes impacting products, such as product label changes (UKCA Mark), a minimum of 18 months is required. This is to allow for purging of supply and distribution chains, upgrading laser etching machines to apply the new mark, etc. In the longer term, we recommend that the UK consider requiring a UKCA mark only when products do not carry a CE mark.
- » Currently the EU NLF allows that where the manufacturers address is EU based, an importers address is not required. Due to the proximity and volume of trade between the two markets, the two parties should continue to continue to accept a UK and EU based manufacturers address as sufficient without also requiring an importer address.
- » The EU NLF allows that "where not possible" to apply the importers address on the product. It may also be applied to the packaging or document accompanying the product, including the sales invoice. There is no requirement to open the packaging to apply the importer address, as per the Blue Guide.



Often it is not possible to know who the importer will be when a product is manufactured. The UK and EU should seek to support the above labelling requirements to reduce potential costs to manufacturing and support stock flexibility.

## 2. Information Technology Agreement

From a broader perspective and remaining well conscious that this is not part of the FTA between the UK and the EU, the Information technology Agreement (ITA) is a historic tariff-busting agreement that has significantly contributed to the digital transformation of our societies and our industries. Ever since its signing in 1996, global industry regards ITA as one of the most commercially viable WTO trade pacts as it promotes jobs, increases competitiveness, lowers consumer prices, boosts economic growth and fosters innovation around the world. DIGITALEUROPE applauded the expansion of ITA to add new products keeping pace with technological change in 2015. We now encourage more governments around the world, including the UK, to become signatories and seek appropriate ways to remove non-tariff barriers. In addition, negotiators should consider a third expansion, bringing into the ITA's remit not only new emerging technology goods, such as 3D printers, but also underpinning technology to the digital economy, for example fibre optic and copper wiring.

## About DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies.

# DIGITALEUROPE Membership

## Corporate Members

Accenture, Airbus, Amazon, AMD, Apple, Arçelik, Bayer, Bosch, Bose, Bristol-Myers Squibb, Brother, Canon, Cisco, DATEV, Dell, Dropbox, Eli Lilly & Company, Epson, Ericsson, Facebook, Fujitsu, Google, Graphcore, Hewlett Packard Enterprise, Hitachi, HP Inc., HSBC, Huawei, Intel, Johnson & Johnson, JVC Kenwood Group, Konica Minolta, Kyocera, Lenovo, Lexmark, LG Electronics, Mastercard, METRO, Microsoft, Mitsubishi Electric Europe, Motorola Solutions, MSD Europe Inc., NEC, Nokia, Nvidia Ltd., Océ, Oki, Oracle, Palo Alto Networks, Panasonic Europe, Philips, Qualcomm, Red Hat, Ricoh, Roche, Rockwell Automation, Samsung, SAP, SAS, Schneider Electric, Sharp Electronics, Siemens, Siemens Healthineers, Sony, Swatch Group, Tata Consultancy Services, Technicolor, Texas Instruments, Toshiba, TP Vision, UnitedHealth Group, Visa, VMware, Xerox.

## National Trade Associations

**Austria:** IOÖ

**Belarus:** INFOPARK

**Belgium:** AGORIA

**Croatia:** Croatian Chamber of Economy

**Cyprus:** CITEA

**Denmark:** DI Digital, IT BRANCHEN, Dansk Erhverv

**Estonia:** ITL

**Finland:** TIF

**France:** AFNUM, Syntec Numérique, Tech in France

**Germany:** BITKOM, ZVEI

**Greece:** SEPE

**Hungary:** IVSZ

**Ireland:** Technology Ireland

**Italy:** Anitec-Assinform

**Lithuania:** INFOBALT

**Luxembourg:** APSI

**Netherlands:** NLdigital, FIAR

**Norway:** Abelia

**Poland:** KIGEIT, PIIT, ZIPSEE

**Portugal:** AGEFE

**Romania:** ANIS, APDETIC

**Slovakia:** ITAS

**Slovenia:** GZS

**Spain:** AMETIC

**Sweden:** Teknikföretagen, IT&Telekomföretagen

**Switzerland:** SWICO

**Turkey:** Digital Turkey Platform, ECID

**Ukraine:** IT UKRAINE

**United Kingdom:** techUK