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Analyzing Law Enforcement Challenges in Cross-Border E-Commerce between Indonesia and ASEAN Member States

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Abstract

The rapid growth of cross-border e-commerce within ASEAN has expanded regional trade opportunities while simultaneously generating increasingly complex legal enforcement challenges. Transactions frequently involve multiple jurisdictions, digital platforms, payment intermediaries, and cross-border data flows, creating difficulties in determining applicable law, allocating regulatory responsibility, and enforcing legal remedies. This study examines the principal law enforcement challenges affecting cross-border e-commerce between Indonesia and ASEAN member states through a comparative normative legal analysis. The research analyzes regulatory frameworks governing electronic transactions, consumer protection, and personal data protection across ASEAN jurisdictions, with particular attention to their implications for cross-border enforcement. The findings indicate that despite the widespread recognition of electronic transactions and the existence of supporting legal frameworks across ASEAN, enforcement remains constrained by jurisdictional fragmentation, divergent platform accountability standards, limitations in cross-border evidence gathering, uneven consumer redress mechanisms, and varying approaches to data governance. The study further demonstrates that ASEAN-level instruments have contributed to regulatory cooperation but have not fully resolved practical enforcement barriers. Accordingly, this article proposes several minimum harmonization priorities aimed at strengthening regulatory interoperability, enhancing cross-border cooperation, and improving consumer protection within the ASEAN digital marketplace. The study contributes to the growing discourse on digital trade governance by providing an integrated comparative framework that connects electronic transaction regulation, consumer protection, and data governance within a single enforcement-oriented analysis.

Keywords: *Cross-Border E-Commerce; ASEAN; Law Enforcement; Consumer Protection; Digital Trade Governance.*

INTRODUCTION

The rapid expansion of digital technologies has transformed the landscape of international commerce, enabling businesses and consumers to engage in transactions beyond national borders with unprecedented ease. Within the ASEAN region, the growth of cross-border e-commerce has been driven by increasing internet penetration, digital payment systems, online marketplaces, and regional economic integration. Consumers can now purchase goods and services from merchants located in different ASEAN member states through digital platforms that facilitate transactions, logistics, and payment processing across multiple jurisdictions. While these developments contribute significantly to economic growth and market accessibility, they also generate complex legal challenges. Cross-border e-commerce transactions frequently involve multiple actors, including consumers, merchants, platform providers, payment intermediaries, and data processors operating under different legal systems. Consequently, disputes arising from such transactions often raise questions regarding applicable law, jurisdiction, enforcement authority, and the execution of legal remedies across national boundaries[1].

To address the growing importance of digital trade, ASEAN member states have adopted various legal and regulatory frameworks governing electronic transactions, consumer protection, and digital governance. Indonesia, for example, has established regulations concerning electronic transactions, electronic commerce, consumer protection, and personal data protection. Similar regulatory instruments can be found across other ASEAN jurisdictions, reflecting a broader regional effort to create a secure and predictable environment for digital commerce[2]. At the regional level, the ASEAN Agreement on Electronic Commerce (2019) represents an important milestone in promoting cooperation and facilitating cross-border digital trade. The agreement seeks to encourage interoperability, paperless transactions, and regulatory cooperation among member states. However, despite these developments, the existence of legal frameworks does not automatically eliminate enforcement difficulties. Differences in legal traditions, institutional capacities, regulatory priorities, and enforcement mechanisms continue to create significant obstacles when disputes involve multiple jurisdictions.

Existing studies have examined cross-border e-commerce from various perspectives, including electronic transaction validity, consumer protection, digital trade governance, intermediary liability, and cross-border data flows. Scholars generally recognize that digital commerce offers substantial economic benefits and strengthens regional integration, yet they also identify persistent challenges related to

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1 Jing You et al., "International Comparison of the Impact of Digital Transformation on Employment," Journal of Asian Economics 95 (December 2024): 101820, https://doi.org/10.1016/j.asieco.2024.101820.

2 Polyxeni Vassilakopoulou and Eli Hustad, "Bridging Digital Divides: A Literature Review and Research Agenda for Information Systems Research," Information Systems Frontiers 25, no. 3 (June 2023): 955–69, https://doi.org/10.1007/s10796-020-10096-3.

jurisdictional conflicts, evidence gathering, regulatory fragmentation, and dispute resolution. In practice, the effectiveness of legal enforcement often depends not only on the existence of legal norms but also on the ability of authorities to coordinate across borders and implement remedies against foreign entities[3]. Furthermore, issues relating to platform accountability, access to digital evidence, consumer redress mechanisms, and personal data governance have become increasingly important as e-commerce ecosystems grow more interconnected. Although ASEAN has introduced cooperative frameworks to support digital commerce, the extent to which these initiatives facilitate practical law enforcement remains subject to significant variation among member states[4].

Despite the increasing body of literature on digital trade and e-commerce regulation, much of the existing research tends to examine electronic transactions, consumer protection, and data governance as separate legal domains. Limited attention has been devoted to analysing how these regulatory frameworks interact within actual cross-border enforcement contexts involving multiple ASEAN jurisdictions. Accordingly, this study aims to analyse the principal law enforcement challenges associated with cross-border e-commerce between Indonesia and ASEAN member states through a comparative legal approach. The study maps the core regulatory instruments governing electronic transactions, consumer protection, and personal data protection across ASEAN countries, identifies key enforcement bottlenecks affecting cross-border disputes, and proposes practical harmonisation priorities that may strengthen regional cooperation. The novelty of this study lies in its integrated ASEAN-wide comparative framework, which connects electronic transaction regulation, consumer protection mechanisms, and data governance regimes within a single enforcement-oriented analysis, thereby providing a more comprehensive understanding of the legal challenges facing cross-border e-commerce in the ASEAN digital economy.

RESEARCH METHODS

This study employs a normative juridical research method focusing on the comparative analysis of legal and regulatory frameworks governing cross-border e-commerce within ASEAN member states. The research is non-empirical in nature and relies exclusively on legal materials rather than field data, surveys, or interviews. The study applies three complementary approaches. First, a statute and regulation approach is utilized to examine international, regional, and national legal instruments relevant to electronic

3 Sophie Lythreatis, Sanjay Kumar Singh, and Abdul-Nasser El-Kassar, "The Digital Divide: A Review and Future Research Agenda," Technological Forecasting and Social Change 175 (February 2022): 121359, https://doi.org/10.1016/j.techfore.2021.121359.

4 Riitta Hänninen, "Revisiting Digital Participation as a Prerequisite of Digital Inclusion," The Information Society 41, no. 4 (August 2025): 256–68, https://doi.org/10.1080/01972243.2025.2500507.

transactions, consumer protection, and personal data protection[5]. Second, a comparative approach is employed to identify similarities, differences, and enforcement implications among the regulatory frameworks of ASEAN member states, including Indonesia, Singapore, Malaysia, Thailand, the Philippines, Vietnam, Brunei Darussalam, Cambodia, Lao PDR, and Myanmar. Third, a conceptual approach is adopted to analyze legal principles relating to electronic commerce, jurisdiction, consumer protection, cross-border enforcement, and digital governance.

The legal materials used in this research consist of primary and secondary sources. Primary legal materials include the ASEAN Agreement on Electronic Commerce, national legislation and regulations governing electronic transactions, consumer protection, and personal data protection in ASEAN member states. Secondary legal materials comprise academic books, peer-reviewed journal articles, ASEAN policy documents, and publications issued by international organizations such as UNCITRAL, UNCTAD, and the OECD. Data were collected through a systematic review of relevant legal documents and scholarly literature, followed by qualitative legal analysis[6]. The analysis focuses on identifying regulatory convergence and divergence, examining practical enforcement challenges in cross-border disputes, and evaluating opportunities for greater regional harmonization. The findings are subsequently synthesized to formulate enforcement-oriented recommendations that may strengthen legal cooperation and regulatory effectiveness in ASEAN's cross-border e-commerce ecosystem.

FINDINGS AND DISCUSSION

The findings of this study are organized into three principal areas of analysis. First, the study presents a comparative mapping of the regulatory frameworks governing electronic transactions, consumer protection, and personal data protection across ASEAN member states. This mapping provides an overview of the legal foundations that support cross-border e-commerce activities within the region. Second, the study identifies major enforcement bottlenecks that continue to hinder effective legal enforcement in cross-border digital transactions. Third, based on the comparative findings, the study proposes several practical legal and policy priorities that may support greater regulatory convergence and strengthen cross-border enforcement mechanisms within the ASEAN digital economy.

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5 F. C. Susila Adiyanta, "Hukum Dan Studi Penelitian Empiris: Penggunaan Metode Survey Sebagai Instrumen Penelitian Hukum Empiris," Administrative Law and Governance Journal 2, no. 4 (November 2019): 697–709, https://doi.org/10.14710/alj.v2i4.697-709.

6 Saptaning Ruju Paminto Rusdin Tahir, I Gde Pantja Astawa, Agus Widjajanto, Mompang L Panggabean, Moh Mujibur Rohman, Ni Putu Paramita Dewi, Nandang Alamsah Deliarnoor, Muhamad Abas, Rizqa Febry Ayu, Ni Putu Suci Meinarni, Fatimah Hs, Ni Wayan Eka Sumartini, Dewi Kania Sugiharti, Metodologi Penelitian Bidang Hukum: Suatu Pendekatan Teori Dan Praktek (Jambi: Sonpedia, 2023).

Given the increasing integration of regional digital markets, understanding the similarities and differences among ASEAN regulatory frameworks is essential for evaluating the effectiveness of existing enforcement mechanisms. While ASEAN has made considerable progress in promoting electronic commerce through regional cooperation initiatives, significant variations remain in national regulatory approaches, institutional capacities, and enforcement practices. These variations directly influence the ability of regulators, businesses, and consumers to resolve cross-border disputes effectively.

Table 1: ASEAN Comparative Regulatory Table for Cross-Border E-Commerce Enforcement
[Source: compiled from ASEAN Agreement on Electronic Commerce and official/authoritative national legal texts listed per row]

No.	Asean State	Key Regulatory Instruments			
		Electronic Transactions / E-Commerce Core	Consumer Protection Core	Personal Data Protection / Privacy Core	Notes for Enforcement (cross-border)
1	Indonesia	UU ITE (11/2008 as amended 19/2016)[7]; PP 80/2019 (PMSE)[8]; UU Perdagangan 7/2014[9]	UU 8/1999 Perlindungan Konsumen[10]	UU 27/2022 Perlindungan Data Pribadi[11]	Multi-agency enforcement; cross-border platform/seller location complicates execution[12]
2	Singapore	Electronic Transactions Act 2010 (ETA)[13]	Consumer Protection (Fair Trading) Act (CPFTA)[14]	Personal Data Protection Act 2012 (PDPA)[15]	Strong institutional capacity; cross-border data transfer rules + platform compliance model
3	Malaysia	Electronic Commerce Act 2006 (Act 658)[16]	Consumer Protection Act 1999[17]	Personal Data Protection Act 2010 (Act 709)[18]	Enforcement depends on regulator coordination; consumer remedies + commercial transaction focus

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7 Departemen Komunikasi dan Informatika Republik Indonesia, Buku Panduan Untuk Memahami UU No. 11 Tahun 2008 Tentang Informasi Dan Transaksi (2008).

8 NUR AZIZAH SITI, ANALISIS HUKUM ISLAM TERHADAP PELAPAK ONLINE WAJIB BERIZIN (Studi Pasal 15 Peraturan Pemerintah Nomor 80 Tahun 2019 Tentang Perdagangan Melalui Sistem Elektronik), May 2021.

9 UU Perdagangan (2014).

10 Undang-Undang (UU) Nomor 8 Tahun 1999 Tentang Perlindungan Konsumen (1999).

11 Undang-Undang (UU) Nomor 27 Tahun 2022 Tentang Pelindungan Data Pribadi (2022).

12 Aurelia Natalia Wisung et al., "The Role of the Financial Services Authority in Handling Online Money Loan Offers by Information Technology-Based Joint Funding Services (LPBBTI)," Journal of Digital Law and Policy 2, no. 3 (May 2023): 141–56, https://doi.org/10.58982/jdlp.v2i3.430.

13 Electronic Transactions Act 2010 (2020 Revised Edition), ACT 2010, https://sso.agc.gov.sg/act/eta2010.

14 Consumer Protection (Fair Trading) Act 2003 (2020 REVISED EDITION), Consumer Protection (Fair Trading) Act 2003.

15 Personal Data Protection Act 2012 (2020 REVISED EDITION), Personal Data Protection Act 2012.

16 Electronic Commerce Act 2006 (Act 658).

17 The Malaysian Consumer Protection Act 1999 (Act 599), Act 599.

18 Personal Data Protection Act 2010 (Act 709), Act 709.

4	Thailand	Electronic Transactions Act B.E. 2544 (2001) (ETDA translation)[19]	Consumer Protection Act B.E. 2522 (1979)[20]	Personal Data Protection Act B.E. 2562 (2019)[21]	Recognises e-transactions widely; consumer contract fairness tools; PDPA compliance adds obligations
5	Philippines	Electronic Commerce Act (RA 8792)[22]	Consumer Act (RA 7394)[23]	Data Privacy Act (RA 10173)[24]	Legal basis for e-docs/e-signatures; data privacy extraterritorial clause helps certain cases
6	Vietnam	Decree 52/2013/ND-CP on E-Commerce; (also Law on e-transactions—various texts)[25]	Law on Protection of Consumers' Rights (2010); newer 2023 text available[26]	Decree 13/2023/ND-CP on Personal Data Protection[27]	Applies to foreign traders with VN presence/domain; consumer law addresses unfair terms; PDP decree adds compliance layer
7	Brunei Darussalam	Electronic Transactions Act (Cap. 196)[28]	Consumer Protection (Fair Trading) Order 2011[29]	Personal Data Protection Order 2025[30]	Newer PD framework strengthens enforcement; historically more limited privacy rules
8	Cambodia	Law on Electronic Commerce (2019)[31]	Law on Consumer Protection (2019)[32]	Draft personal data protection law (2025 draft)	E-commerce law covers cross-border; data protection still developing → enforcement gaps for cross-border data cases
9	Lao PDR	Law on Electronic Transactions (2012)[33]	Law on Consumer	Emerging/sectoral; governance documents indicate developing framework	Enforcement capacity and institutional fragmentation often noted; cross-border cooperation important

19 The Electronic Transactions Act B.E. 2544 (2001), https://www.etda.or.th/getattachment/8faa736b-3235-49c8-8b01-d37ff53a9a45/ENG-Version.aspx.

20 Thailand Consumer Protection Act BE 2522, Act BE 2522.

21 Personal Data Protection Act,BE 2562 (2019), Act BE 2562.

22 The Electronic Commerce Act of 2000 (Republic Act No. 8792), Republic Act No. 8792.

23 Consumer Act of the Philippines, Republic Act No. 7394, https://aseanconsumer.org/file/pdf_file/Republic%20Act%20No.%207394%20-%20The%20Consumer%20Act%20of%201992.pdf.

24 The Data Privacy Act (RA 10173), RA 10173.

25 Law on Electronic Transactions 2023, Decree 52/2013/ND-CP (heavily amended by Decree 85/2021/ND-CP).

26 Law on Protection of Consumer Rights No. 19/2023/QH15 (CRPL 2023), Pub. L. No. 19/2023/QH15 (CRPL 2023).

27 Decree 13/2023/ND-CP on Personal Data Protection.

28 The Electronic Transactions Act (Cap. 196).

29 The Consumer Protection (Fair Trading) Order, 2011 (CPFTO).

30 Personal Data Protection Order (PDPO).

31 Law on Electronic Commerce (2019).

32 Law on Consumer Protection (2019).

33 Law on Electronic Transactions (No. 20/NA).

			Protection (2010)[34]		

The comparative mapping presented in Table 1 demonstrates that all ASEAN member states have adopted legal instruments governing electronic transactions and consumer protection, although the scope, maturity, and implementation of these frameworks vary considerably. Several jurisdictions have also established comprehensive personal data protection regimes, while others continue to develop their regulatory structures. Despite this apparent regulatory progress, the existence of legal frameworks alone does not guarantee effective enforcement in cross-border contexts[35].

The analysis reveals that enforcement challenges frequently arise not from the absence of regulation, but from differences in jurisdictional approaches, regulatory priorities, institutional capacities, and mechanisms for cross-border cooperation[36]. Consequently, identifying the practical barriers that hinder enforcement becomes crucial for understanding why legal disputes in cross-border e-commerce remain difficult to resolve despite growing regulatory sophistication across the ASEAN region.

Why Enforcement is Hard in Cross-Border E-Commerce (Main Bottlenecks)

1. **Jurisdiction and choice-of-law fragmentation**
   Even if e-contracts are legally recognized, cross-border disputes require deciding forum and applicable law[37]. Many ASEAN legal systems do not provide uniform, consumer-friendly cross-border rules, creating uncertainty for regulators and courts when sellers/platforms are offshore[38].
2. **Platform/intermediary accountability differs across states**
   ASEAN countries vary on how they impose duties on intermediaries (notice-and-takedown, record retention, seller verification, licensing/registration models). This means a platform's compliance

[34] Law on Consumer Protection (2010), https://aseanconsumer.org/read-legislation-law-on-consumer-protection-2010-lao.

35 Lythreatis, Singh, and El-Kassar, "The Digital Divide."

36 Neha Mishra and Ana Maria Palacio Valencia, "Digital Services and Digital Trade in the Asia Pacific: An Alternative Model for Digital Integration?," Asia Pacific Law Review 31, no. 2 (July 2023): 489–513, https://doi.org/10.1080/10192557.2023.2216058.

37 Mira Burri and Rodrigo Polanco, "Digital Trade Provisions in Preferential Trade Agreements: Introducing a New Dataset," Journal of International Economic Law 23, no. 1 (March 2020): 187–220, https://doi.org/10.1093/jiel/jgz044.

38 Anupam Chander and Haochen Sun, eds., Data Sovereignty: From the Digital Silk Road to the Return of the State, 1st ed. (Oxford University PressNew York, 2023), https://doi.org/10.1093/oso/9780197582794.001.0001.

obligations change by jurisdiction, and enforcement actions can be avoided by shifting operations or data location[39].

3. **Evidence collection and cross-border investigation**

   Cross-border e-commerce cases need digital evidence (logs, transaction records, seller identity, payment trail). Evidence is often held by foreign platforms/processors. Without strong mutual assistance channels, enforcement becomes slow or ineffective[40].

4. **Consumer redress and ODR interoperability is limited**

   Even where consumer protection laws exist, cross-border complaint handling, refunds, and dispute resolution are not standardized. ASEAN has consumer protection cooperation materials, but complaint-to-remedy pipelines remain uneven across member states.

5. **Data governance and cross-border data flows constraints.**

   Cross-border enforcement increasingly depends on lawful access/transfer of data. ASEAN has a Framework on Digital Data Governance and principles on cross-border data flows, but domestic privacy regimes still vary significantly, affecting investigations and compliance[41].

Collectively, these enforcement bottlenecks illustrate that cross-border e-commerce disputes cannot be addressed solely through domestic legal frameworks. The interconnected nature of digital transactions requires cooperation among regulatory authorities, harmonized legal standards, and effective mechanisms for information exchange and dispute resolution. In many cases, enforcement challenges emerge at the intersection of multiple legal regimes, including electronic transactions law, consumer protection law, and personal data governance[42].

The findings further suggest that legal fragmentation remains one of the most significant obstacles to effective enforcement within the ASEAN digital marketplace. Although member states generally recognize the legal validity of electronic transactions, differences in procedural rules, intermediary obligations, consumer remedies, and data governance requirements continue to create uncertainty for both businesses and consumers. These circumstances highlight the importance of evaluating the contribution of ASEAN-level instruments in supporting regional regulatory coordination.

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39 Neha Gulati, "Framework for Cognitive Agent Based Expert System for Metacognitive and Collaborative E-Learning," Proceedings of the 2013 IEEE International Conference in MOOC, Innovation and Technology in Education, MITE 2013, 2013, https://doi.org/10.1109/MITE.2013.6756380.

40 Mira Burri, María Vásquez Callo-Müller, and Kholofelo Kugler, "The Evolution of Digital Trade Law: Insights from TAPED," World Trade Review 23, no. 2 (May 2024): 190–207, https://doi.org/10.1017/S1474745623000472.

41 Mira Burri, ed., Big Data and Global Trade Law, 1st ed. (Cambridge University Press, 2021), https://doi.org/10.1017/9781108919234.

42 Mira Burri, "The Governance of Data and Data Flows in Trade Agreements: The Pitfalls of Legal Adaptation," SSRN Scholarly Paper no. 3067973 (Rochester, NY: Social Science Research Network, November 9, 2017), https://papers.ssrn.com/abstract=3067973.

ASEAN-Level Instruments: What They Help, What They Don't?

The ASEAN Agreement on Electronic Commerce (2019) supports cooperation and an enabling environment, including encouraging paperless trade and interoperability, but it is not a single "ASEAN e-commerce code" with uniform sanctions. Therefore, enforcement still relies heavily on domestic laws and national agencies.

ASEAN consumer protection references (handbooks and coordinated approaches) help create shared understanding and capacity-building, but practical cross-border enforcement still depends on (i) domestic implementing rules, (ii) institutional MOUs, and (iii) technical interoperability for complaints and evidence exchange.

The preceding analysis indicates that ASEAN-level initiatives have played an important role in facilitating digital trade and encouraging regulatory cooperation among member states[43]. Nevertheless, the effectiveness of these instruments remains dependent upon domestic implementation and the willingness of national authorities to engage in practical cross-border collaboration. As a result, significant gaps continue to exist between regional policy aspirations and operational enforcement realities[44].

Accordingly, the next stage of analysis focuses on identifying practical legal and policy priorities that may contribute to reducing regulatory fragmentation and strengthening enforcement effectiveness. Rather than proposing comprehensive legal unification, the recommendations emphasize minimum harmonization measures that remain feasible within ASEAN's diverse legal and institutional landscape.

Policy Implications and Harmonisation Priorities

The comparative analysis and enforcement assessment demonstrate that the principal challenges facing cross-border e-commerce in ASEAN do not arise from the absence of legal regulation. On the contrary, most ASEAN member states have already established legal frameworks governing electronic transactions, consumer protection, and, to varying degrees, personal data protection. However, differences in regulatory design, institutional capacity, enforcement procedures, and cross-border cooperation mechanisms continue to generate legal uncertainty and practical enforcement difficulties.

43 Michèle Finck and Frank Pallas, "They Who Must Not Be Identified—Distinguishing Personal from Non-Personal Data under the GDPR," International Data Privacy Law 10, no. 1 (February 2020): 11–36, https://doi.org/10.1093/idpl/ipz026.

44 Alex J. Wood et al., "Good Gig, Bad Gig: Autonomy and Algorithmic Control in the Global Gig Economy," Work, Employment and Society 33, no. 1 (February 2019): 56–75, https://doi.org/10.1177/0950017018785616.

Table 2: Enforcement Challenges and Practical Legal/Policy Priorities
[Source: author synthesis based on ASEAN Agreement on Electronic Commerce + ASEAN consumer protection materials + ASEAN data governance framework]

No	Enforcement Challenge	Root Cause	ASEAN/Regional Lever	Priority Action for Indonesia–ASEAN Context
1	Cross-border seller identity + accountability	Offshore sellers + weak verification	ASEAN cooperation agenda	Require baseline seller verification on platforms; standardised merchant identity fields
2	Jurisdiction uncertainty	Different consumer contract rules	ASEAN dialogue + model clauses	Promote ASEAN model consumer e-contract clauses + clearer forum/choice rules
3	Evidence access	Data stored abroad; privacy constraints	ASEAN data governance principles	Standard request protocols + lawful cross-border data access safeguards
4	Consumer redress gaps	No interoperable ODR	ASEAN consumer cooperation tools	Build cross-border complaint/ODR referral path (minimum standard)
5	Divergent platform duties	Different licensing/notice models	Best-practice convergence	Minimum platform duties: notice, takedown, transparency, record retention (proportionate)

These findings suggest that the primary policy challenge is not the creation of entirely new regulatory regimes, but rather the development of greater regulatory coherence and operational interoperability among ASEAN member states. Accordingly, the following recommendations focus on practical legal and policy priorities that may enhance cross-border enforcement effectiveness while respecting the diversity of ASEAN legal systems and national regulatory approaches.

CONCLUSION

This non-empirical comparative study shows that ASEAN member states generally recognise electronic communications and transactions, but cross-border e-commerce enforcement remains difficult due to regulatory fragmentation and uneven institutional capacity. The most persistent obstacles are jurisdiction/choice-of-law uncertainty, inconsistent platform responsibilities, cross-border evidence access barriers, limited interoperable consumer redress, and divergent data governance regimes. While the ASEAN Agreement on Electronic Commerce provides a cooperation framework, its real enforcement impact depends on domestic implementing rules and practical cross-border operational mechanisms.

For Indonesia, the strongest path forward is not only strengthening national rules, but also pushing ASEAN-aligned minimum standards for platform accountability, cross-border complaint handling/ODR referral, trusted data governance, and mutual assistance procedures. Future research should add empirical validation through case studies of cross-border complaints, enforcement outcomes, and platform compliance behaviour across ASEAN.

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