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**Dear colleagues,**

On behalf of the leadership of the ICC Global Digital Economy Commission, we are pleased to share their outlook for 2025. As we navigate an increasingly complex digital landscape, our focus remains on advancing an inclusive, trusted, and predictable digital economy. We look forward to working with you in the year ahead to drive meaningful progress on these priorities.

## **ICC Global Digital Economy Commission Leaders Outlook 2025**

As we enter 2025, the global digital landscape continues to be shaped by shifting economic and political realities. The geopolitical environment remains complex, with governments reassessing their digital policies in response to evolving security concerns, economic pressures, and the increasing influence of emerging technologies. These dynamics are leading to a growing push for an intergovernmental approach to digital governance, with discussions and initiatives becoming increasingly centralized at the United Nations in New York. This shift signals a move toward more state-led decision-making, with significant implications for the role of business and other stakeholders in shaping digital policy.

At the same time, regulatory fragmentation remains a critical challenge. Diverging national and regional regulatory frameworks on cybersecurity, data governance, and artificial intelligence (AI) create legal uncertainty and complicate cross-border digital trade and investment. The lack of harmonization in digital policy approaches risks undermining the open, interconnected, and resilient digital economy that global businesses rely on.

## **Major policy trends and their implication for business**

Policymakers worldwide are expected to focus on a number of digital issues in 2025, out of which we highlight the following three of particular interest to our Commission:

**Strengthening national cyber resilience:** As cyber threats become more sophisticated and widespread, governments are prioritizing efforts to secure critical infrastructure, enhance cyber defences, and build institutional capacities to address cyber risks. This includes not only strengthening technical protections but also improving incident response capabilities, fostering cyber hygiene practices across industries, and relying on businesses to share threat intelligence and best practices. However, there is a growing risk that government responses will increasingly focus on mandating additional compliance obligations on businesses, rather than fostering cooperative and flexible approaches. Strengthening public-private cooperation will be essential to

ensure a comprehensive and effective approach to cyber resilience, while the need for international collaboration will remain crucial, given the cross-border nature of cyber threats.

**Addressing challenges posed by unequal access to the benefits of data:** Data has become a central driver of economic and societal progress, yet disparities in access to data and digital tools persist. Many policymakers perceive that the benefits of data are concentrated to a few, which fuels protectionist and restrictive policies on data, as governments seek to ensure that their economies can benefit more equitably from the digital economy. Policymakers are increasingly focused on global governance frameworks that promote fair access to data while maintaining security and privacy safeguards. Business must respond by demonstrating the economic and social benefits of cross-border data flows, advocating for responsible data-sharing mechanisms, and working collaboratively with governments to ensure that developing economies can leverage data-driven innovation for growth. The challenge will be to find solutions that address these concerns without fragmenting the global digital economy or stifling innovation through overly restrictive regulations.

**Advancing international collaboration on AI:** The rapid development and deployment of AI are driving governments to accelerate regulatory initiatives, with a proliferation of AI-related policy frameworks, standards, and governance mechanisms emerging across different jurisdictions. This has created a complex landscape for businesses, with diverging requirements on AI safety, transparency, and accountability. Additionally, the United Nations is showing an increasing appetite for intergovernmental decision-making on AI governance, raising concerns about state-led regulatory approaches that may exclude key private sector and multistakeholder perspectives. The risk of regulatory fragmentation and misalignment between national and international AI policies threatens to hinder AI adoption, investment, and cross-border innovation. Strengthening international cooperation to develop interoperable standards and governance mechanisms will be critical to ensuring that AI governance remains globally coordinated and conducive to both innovation and responsible development, deployment and use. Furthermore, ensuring that AI development is inclusive will be crucial for global progress.

These trends have businesses worldwide face two key challenges in 2025:

**Proliferation of policy spaces, approaches, standards, and regulations:** The increasing number of regulatory initiatives on cybersecurity, data, and AI—across multiple forums and jurisdictions—creates compliance burdens and operational complexities for businesses operating across borders. Companies must navigate a patchwork of regulations that may not align, leading to higher costs, operational inefficiencies, and potential legal uncertainties. Ensuring regulatory coherence and avoiding conflicting requirements will be essential for businesses seeking to scale and innovate in the digital economy.

**Inward-looking and protectionist attitudes to technology:** A growing number of governments are adopting restrictive policies on data flows, digital trade, and emerging technologies, limiting market access and innovation. Measures such as data localization requirements, barriers to cross-border AI collaboration, and restrictions on foreign digital service providers threaten to fragment the global digital economy. Such

approaches undermine the ability of businesses to leverage global supply chains, access international markets, and develop innovative solutions that rely on open digital ecosystems. Addressing these challenges will require continued advocacy for open, rules-based digital trade policies that support global economic integration.

## Looking ahead and next steps

In 2025, several global initiatives will shape the digital policy landscape, presenting opportunities for business engagement:

**Implementation of the Global Digital Compact (GDC):** As governments and stakeholders move to implement the commitments made under the GDC, businesses have an important role to play in shaping practical solutions that promote an open, secure, and inclusive digital environment.

**Addressing barriers to data free flow and re-establishing trust:** Businesses must actively engage in key policy discussions at the national, regional, and international levels to advocate for frameworks that facilitate trusted data flows across borders.

**20-year review of the World Summit on the Information Society (WSIS+20):** The WSIS+20 process presents a pivotal opportunity to reaffirm the principles of a multistakeholder approach to digital governance and ensure that the future of digital cooperation is inclusive, transparent, and business-friendly. To navigate these challenges and opportunities, the ICC Global Digital Economy Commission will continue to:

- **Share business recommendations** on digital governance frameworks that support an inclusive, trusted, and predictable digital economy.
- **Engage with policymakers and international organizations** to shape digital policies that foster innovation, investment, and global cooperation.
- **Advocate for regulatory coherence** to reduce fragmentation and enable businesses to operate seamlessly across markets.
- **Support multistakeholder dialogues** that recognize the critical role of the private sector in advancing digital development and security.

As we look ahead, our commitment remains clear: to work with our members and stakeholders to co-create policies that support innovation, economic growth, and inclusive development while maintaining global interoperability.

We are looking forward to working with you all this year.

**Rene, Deena, Ellen, Francois, Juan-Luis, Juntao and Peter**

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