



Response to USTR consultation on EU-US TTC Global Trade Challenges Working Group

DIGITALEUROPE appreciates the opportunity to provide input for the discussion on the future of the TTC and its Global Trade Challenges Working Group. We believe in the shared benefits of EU-US cooperation, leveraging the transatlantic marketplace that comprises around one third of global GDP.

The TTC has already delivered results on sustainable trade, AI, 6G and secure ICT infrastructure, but there is room to expand the existing work. The EU and US must focus on promoting critical and green technologies that enhance digital resilience and economic security, and drive forward cooperation on the technologies of the future.

DIGITALEUROPE highlights the following key areas of cooperation:

Drive forward collaboration on economic security and critical technologies

The EU and US should utilise the TTC to coordinate their approaches to economic security. As we outlined in our study '[The EU's Critical Tech Gap](#),' Europe lags behind in 7 of the 8 critical technologies we analysed, but shortcomings can be mitigated by enhancing cooperation with likeminded partners. As the EU and US are developing and have developed lists of critical technologies, both sides should utilise the TTC to share best practices gained during the exercise.

Already today, the TTC offers tools to enhance economic security, for instance through early-warning mechanisms to identify supply chain disruptions. After Russia's war of aggression against Ukraine, the TTC served as an effective platform to coordinate the enforcement of trade restrictions against Russia, including export controls and sanctions. Both sides need to maintain such a level of coordination to avoid inconsistent enforcement of trade-defence measures across the Atlantic.

As efforts are underway to develop economic security standards in the G7, we believe the EU and US should utilise the TTC to align their respective positions, in close consultation with stakeholders, whose input is vital in an effort towards strengthening supply chain resilience. EU-US dialogue within Working Group 10 has also the potential to inform and shape broader action at the WTO and

G7, promoting trade and investment in sustainable goods, technologies, and services.

Furthermore, whilst we recognise that this primarily falls under the scope of Working Group 7 on Export Controls, the EU and US should continue discussions on how to address shortcomings in the international export control regime.

Accelerate Collaboration on Green Technologies

We welcome the establishment of a Joint EU-US Catalogue of Best Practices on Green Public Procurement, a step that DIGITALEUROPE called for in 2022's '[Becoming Tech Allies](#).' EU-US leadership in green technologies can accelerate the green and digital transition and set global sustainability standards. The EU and the US should work towards facilitating the trade of green goods and services at bilateral and international levels, including on circularity at the WTO.

We demonstrated the benefits of the digital product passport (DPP) by hosting a [roundtable](#) at the TIST stakeholder event in Washington D.C. The DPP is a valuable tool for facilitating sustainable trade through transparency. Its strength lies in its functioning as an information hub, enabling the efficient exchange of critical data. We encourage further transatlantic engagement on the DPP as outlined in the Lulea TTC Joint Statement, driving forward private-public initiatives. In such regard, we welcomed the recent 'Virtual Workshop on Promoting Transparency and Traceability in Clean Tech Supply Chains' under the TIST. DIGITALEUROPE remains available to share experiences as a consortium partner to CIRPASS, a forum for cooperation and transfer of knowledge between European and global initiatives towards the deployment of DPPs. Alignment on DPP standards should be pursued across the globe.

A positive agenda

At DIGITALEUROPE, we are firm believers in the importance of close transatlantic collaboration. This also necessitates addressing outstanding disputes and irritants, as well as preventing new disputes from arising, not least through transparent information sharing of relevant regulatory measures. On green technology incentives specifically, we encourage regular dialogue between the EU and US.

Collaboration on AI and emerging technologies

We recognise the important work on AI that has been achieved in the TTC, also outside of WG10. DIGITALEUROPE highlights the benefits of AI global governance, as AI models have an inherently global reach with value chains that are globally integrated. It is therefore imperative to foster an interoperable approach to AI regulation to fully harness this technology, focusing on common standards and terminology whilst respecting each bloc's regulatory framework.

Cooperation between the US and EU AI Offices is an important step forward, as committed in the TTC Statement in Leuven. We welcome international cooperation on AI, including the International Network of AI Safety Institutes, whose inaugural convening will take place in November in San Francisco. In that regard, as reiterated in the TTC Statement in Leuven, cooperation on AI should build upon the Joint Roadmap on Evaluation and Measurement Tools for Trustworthy AI and the Hiroshima AI Process.

Likewise, the TTC has delivered important results on 6G and secure ICT infrastructure, as DIGITALEUROPE asked in its 'Becoming Tech Allies'. We welcomed the 6G vision outlined in the TTC Statement in Leuven and we call for further strengthening such collaboration to boost technology development. In the TTC Statement in Leuven, principals committed to advance the work on security of ICT infrastructure in third countries. At the same time, we also encourage the EU and US to strengthen their collaboration on the resilience of critical infrastructures on both sides of the Atlantic.

A skilled workforce forms a crucial foundation for collaboration in AI and emerging technologies. In that regard, DIGITALEUROPE is proud to support and contribute to the EU-US Talent for Growth Task force to boost activities to upskill and reskill the workforce on both sides of the Atlantic, including in EU neighbourhood countries, with critical digital and cyber skills. This work needs to be continued.

Finally, whilst recognising it is out of the scope of WG 10, the EU-US Cyber Dialogue should continue to work towards cyber harmonisation. Regulatory alignment on cyber issues is crucial to avoiding fragmentation and supporting cross-border trade, as noted in a joint [paper](#) with the Aspen Institute.

Conclusions

The EU-US TTC has become an important platform, with significant deliverables on sustainable trade, AI, 6G and secure ICT infrastructure. DIGITALEUROPE believes that the success of any initiative hinges on strong stakeholder engagement. Thus, the TTC should facilitate regular stakeholder meetings – announced well in advance for effective planning - to gather insights from industry experts. The TIST event held in Washington in January 2024 serves as a model and should be replicated.

We encourage EU and US counterparts to maintain the TTC in the next administration, further developing and improving the partnership, including on Economic Security and Critical Technologies. Likewise, the current ministerial structure of the TTC should be maintained, with bi-annual meetings at principals' level for both trade and technology issues. DIGITALEUROPE is ready to support with further input, as we have done over the last years with numerous publications and direct participation in TTC Ministerial stakeholder events.

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About DIGITALEUROPE

DIGITALEUROPE is the leading trade association representing digitally transforming industries in Europe. We stand for a regulatory environment that enables European businesses and citizens to prosper from digital technologies. We wish Europe to grow, attract, and sustain the world's best digital talents and technology companies. Together with our members, we shape the industry policy positions on all relevant legislative matters and contribute to the development and implementation of relevant EU policies. Our membership represents over 45,000 businesses that operate and invest in Europe. It includes 108 corporations that are global leaders in their field of activity, as well as 41 national trade associations from across Europe.