



BANCA D'ITALIA
EUROSISTEMA

The Digital Economy Amid Rising International Tensions

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Cybersecurity and Trade Fragmentation

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The opinions expressed are attributable to the authors only and do not necessarily reflect those of Bank of Italy

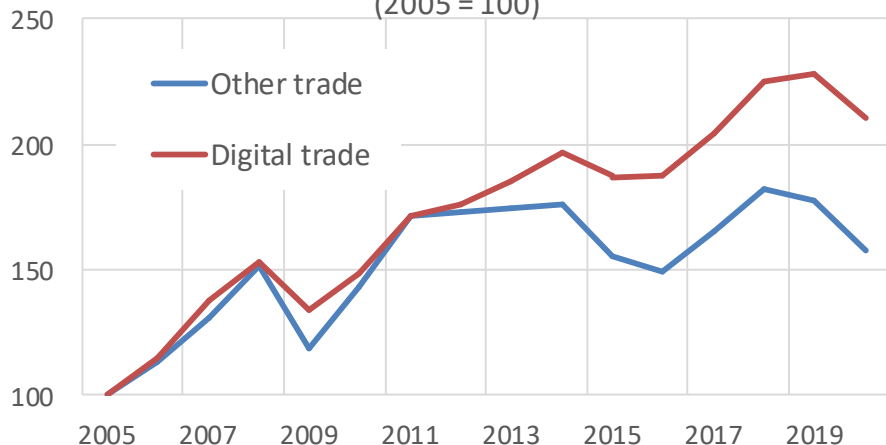
- **Introduction**
- **Cybersecurity as a non-tariff barrier**
- **Impact on trade and corporates' operation**
- **Geopolitical dynamics and regulatory divergence**
- **Conclusions**

Introduction

Introduction – some major trends in global trade

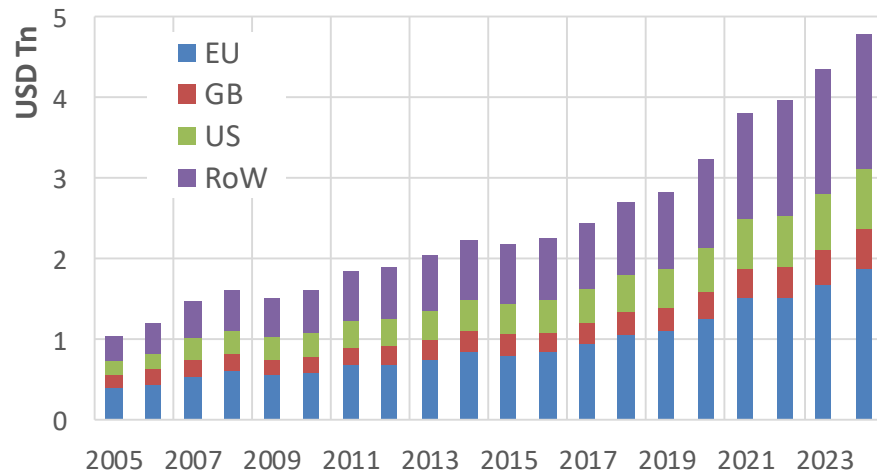
Digital vs Non-digital trade

(2005 = 100)



Source: OECD calculation on TiVa.

Value of digitally exported services

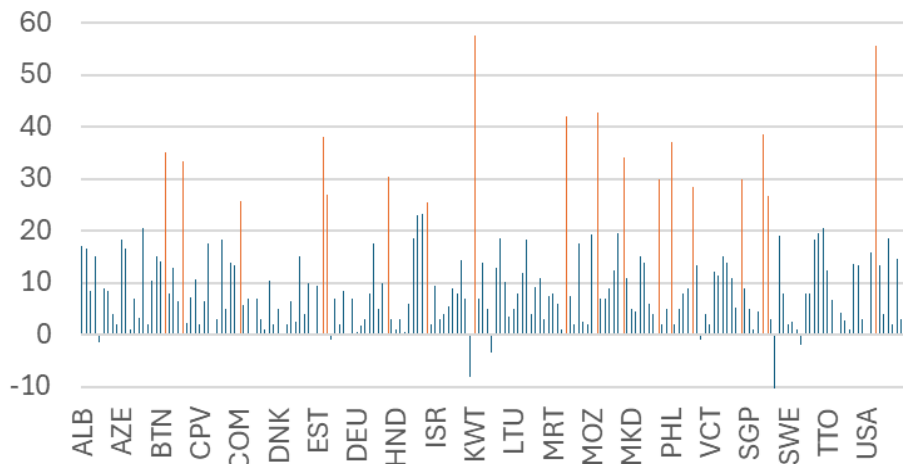


Source: WTO.

- Digital trade in goods and services has outgrown non-digital trade
- Service sector benefitted particularly from the increase in digital technologies
- Baldwin (2025): while trade in goods seems to have peaked, service trade is still growing

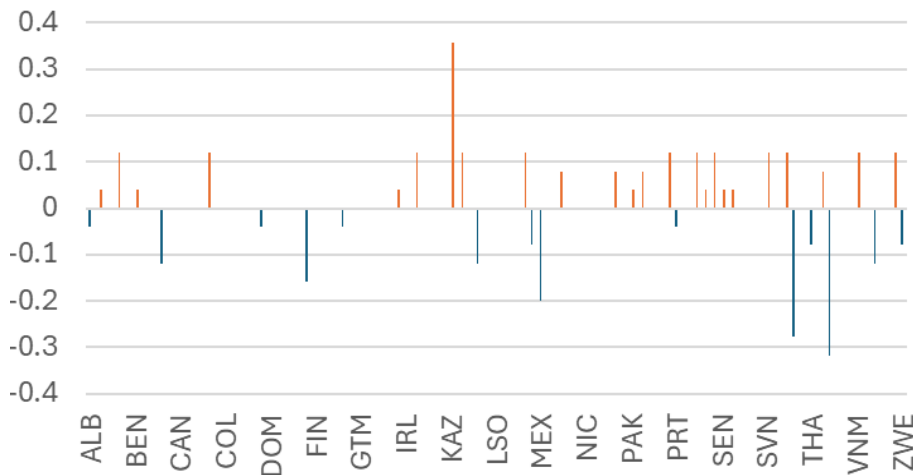
Introduction – regulation in the digital domain has increased

Changes in digital regulation 2014-2024



Source: ITU-ICT Regulatory Tracker.

Changes in Digital STRI - Connect. (2014-2024)



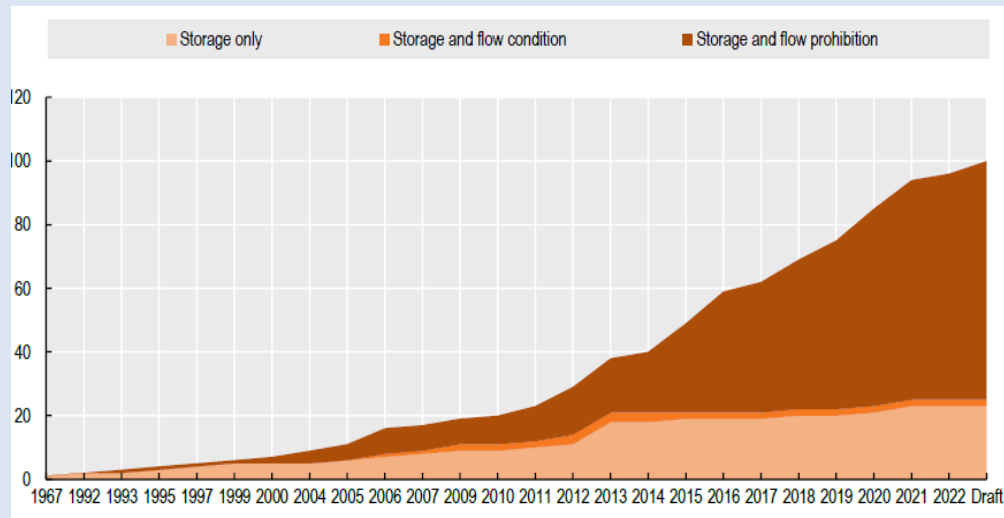
Source: ITU-ICT Regulatory Tracker.

- **The digital world has become a much more regulated space**, especially among emerging markets
- **Higher regulation comes along with higher restrictions to digital trade**

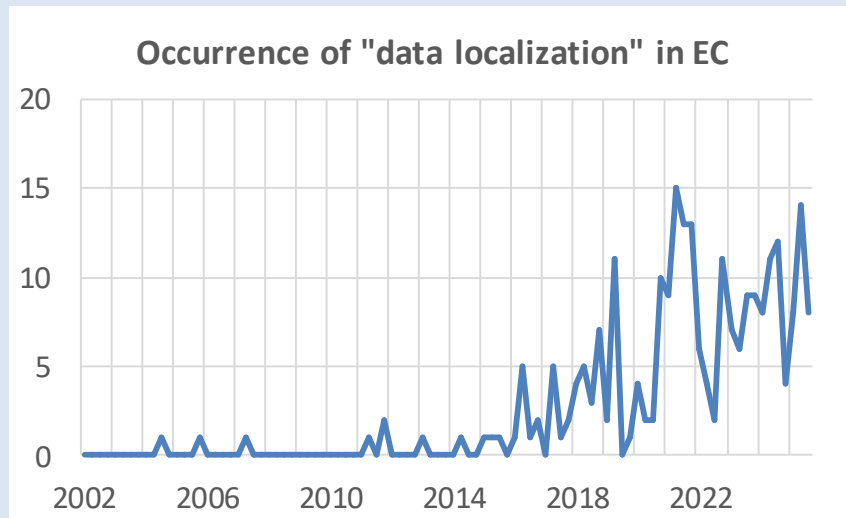
Cybersecurity as a non-tariff trade barrier

While aimed at protecting national infrastructure and consumer data, cybersecurity measures often function as NTBs (especially for services). Four mechanisms contribute to this dynamic:

- **Data localization laws** – By requiring data to be stored or processed within national borders and restricting cross-border flows they hinder the scalability of digital services
- **Divergent cybersecurity standards** – Non-interoperable standards increase compliance costs, create asymmetries in market access and forces MNCs to segregate the ICT systems
- **Security driven restrictions** – Affecting foreign digital infrastructure providers (e.g., cloud) can act as de facto protectionist tools, fragmenting global value chains
- **Ambiguities in WTO and other FTA** - Rules regarding cybersecurity exceptions often allow for broad interpretations legitimizing restrictions under the guise of national security

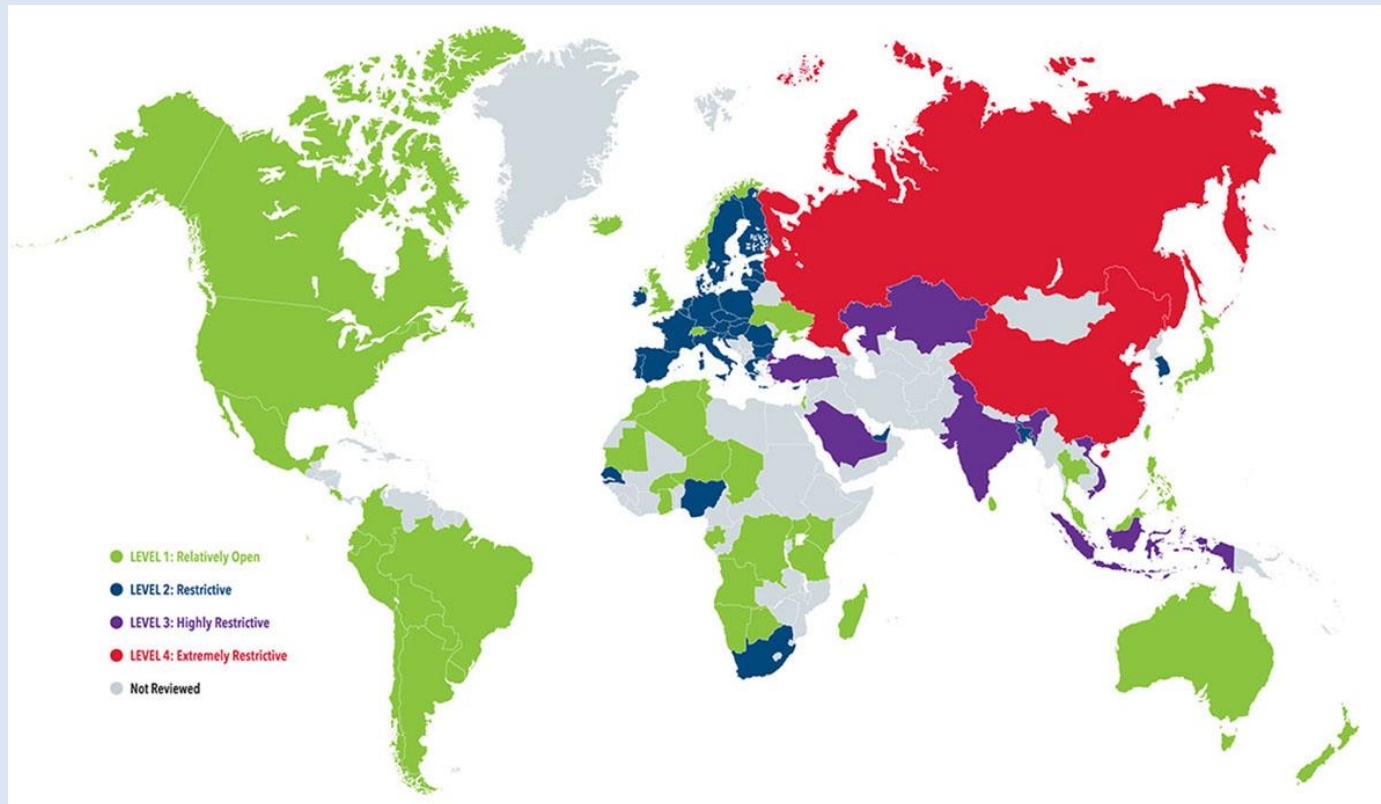


Source: Del Giovane et al (2023) OECD PPNo. 278.



Source: NL Analytics.

- Data localization laws are swiftly increasing over time
- *“The position paper is critical of policies that risk creating ‘two separate systems’ [...] need for many companies to create distinct policies and procedures when dealing with China compared to the rest of the world...”*



Source: Global Data Alliance.



Fragmented Cybersecurity Regulations – Multinational companies face complex, overlapping regulations with inconsistent language and enforcement across countries.

Operational Inefficiencies and Risks – Segregating IT systems by country increases costs and risk of non-compliance due to regulatory divergence.

Compliance Complexity and Costs – Companies must comply with multiple standards like NIST, ISO, and GDPR, raising administrative burdens and costs.

Challenges in Harmonization – Efforts to standardize regulations, face political, cultural, and institutional obstacles worldwide.

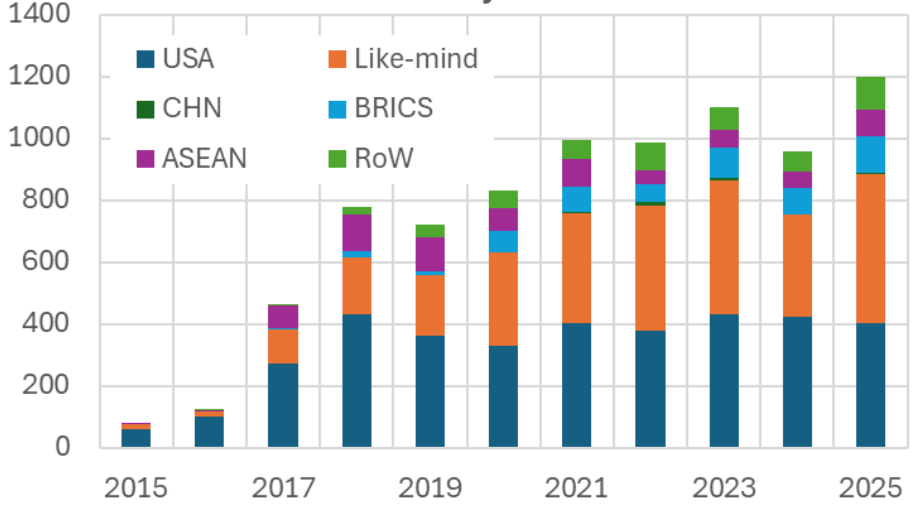
Source: Marotta and Madnick (2020,2021).

- **Cybersecurity as a Trade Policy** - Cybersecurity concerns are treated as national security priorities. These measures **blur the line between legitimate security regulation and protectionism**
- **The WTO legal framework** - GATT, GATS, and TRIPS allows members to deviate from liberalization commitments for actions “necessary to protect essential security interests.” **There is a case for “self-judging”** clause creating legal ambiguity
- **New digital trade agreements** - While attempting to discipline the matter, these agreements **allow exceptions when justified by “legitimate public policy objectives”** mirroring WTO’s open-ended security clauses

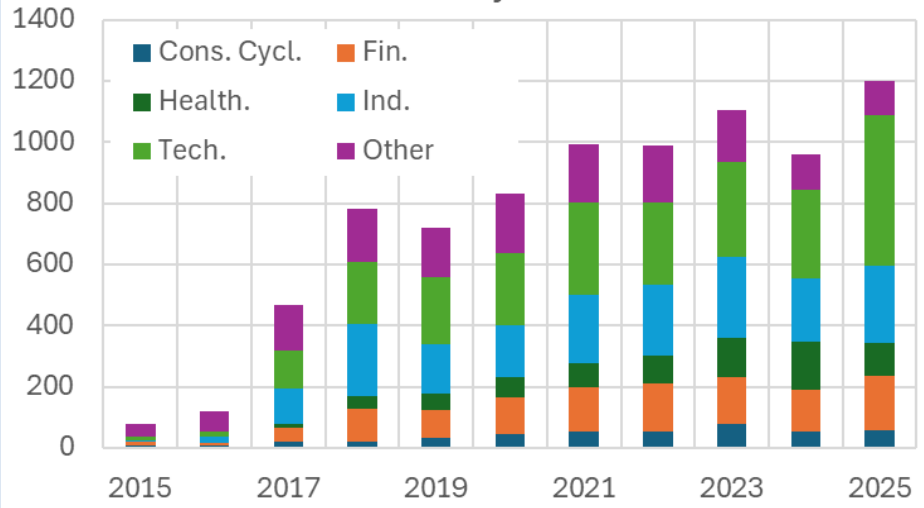
Impact on trade and Multinational Corporations (MNCs) operations

Impact on MNCs operations

Occurrence of "cybersec" in EC



Occurrence of "cybersec" in EC

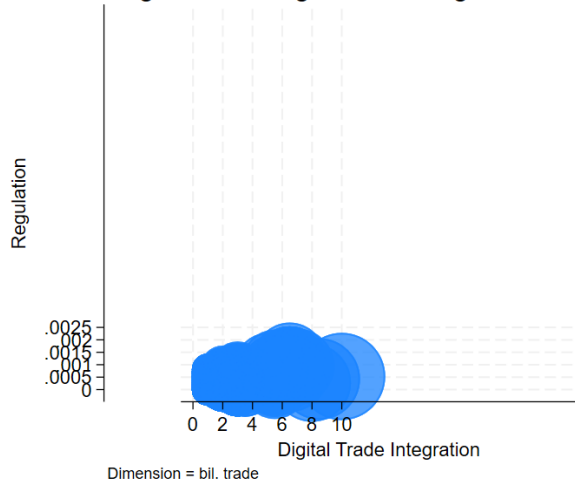


Source: NL Analytics.

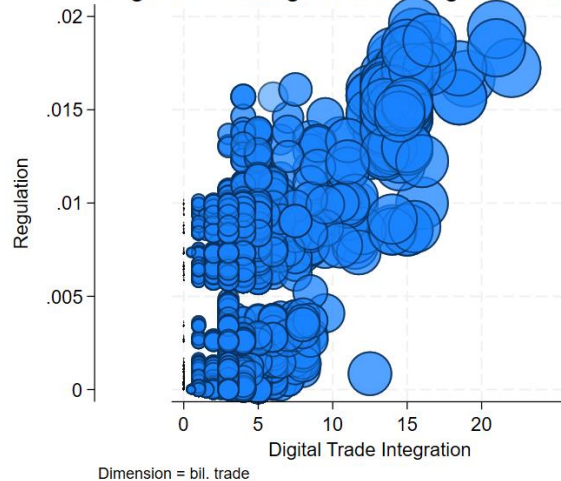
- Among listed corporates, “cybersecurity” matters for earnings starting from 2017
- As a concern, is mostly shared among firms in the US and likeminded (EU,CA,UK, CH ...)
- Technology, industry and finance are the most affected sectors

Impact on trade – Digital trade integration

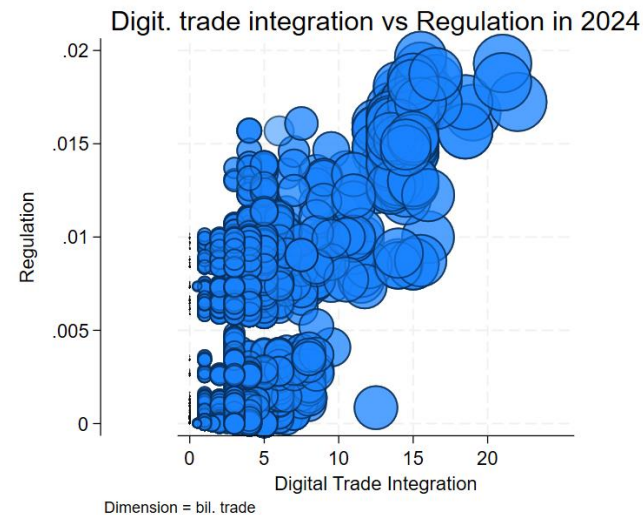
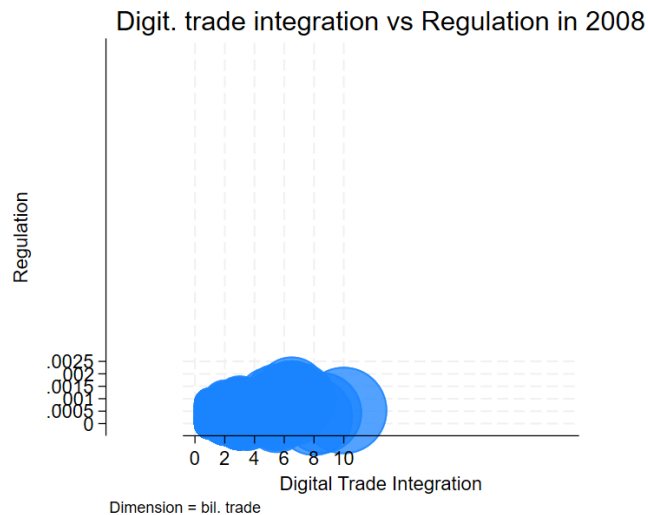
Digit. trade integration vs Regulation in 2008



Digit. trade integration vs Regulation in 2024



- To grasp the comprehensiveness of cyber regulation we will use **INDIGO (Index of Digital Trade Integration and Openness)**, a OECD's integrated database
- **INDIGO Bilateral** is the subset of the OECD INDIGO database that focuses specifically on bilateral trade flows in services between reporting and partner countries.

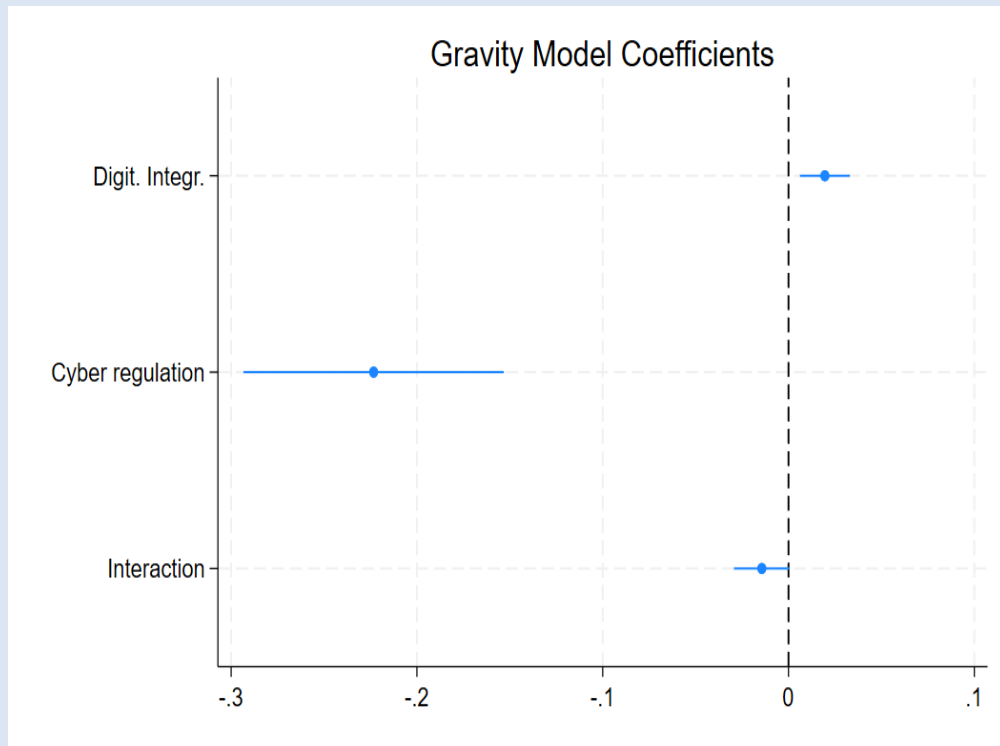


- From 2008 to 2024, **digital trade integration and regulatory intensity have increased**, suggesting that digital interconnectedness was accompanied by stronger regulation
- However, the heterogeneity in regulatory intensity across countries points to growing **risks of regulatory fragmentation**

- **We will use a simple economic model that predicts trade between two countries** based on their size (GDP) and distance - like gravity
- **The model explains most trade patterns**, so we can see the extra impact of digital integration (INDIGO) and cybersecurity on trade.
- We **combine trade data with country characteristics** (GDP, distance, geography, population, agreements ...) **and digital indicators**. The model estimates how each factor changes bilateral trade flows
- The hypothesis we're testing is that **what matters for bilateral trade is not only the level of regulation in each country but also the integration of the two regulatory framework**

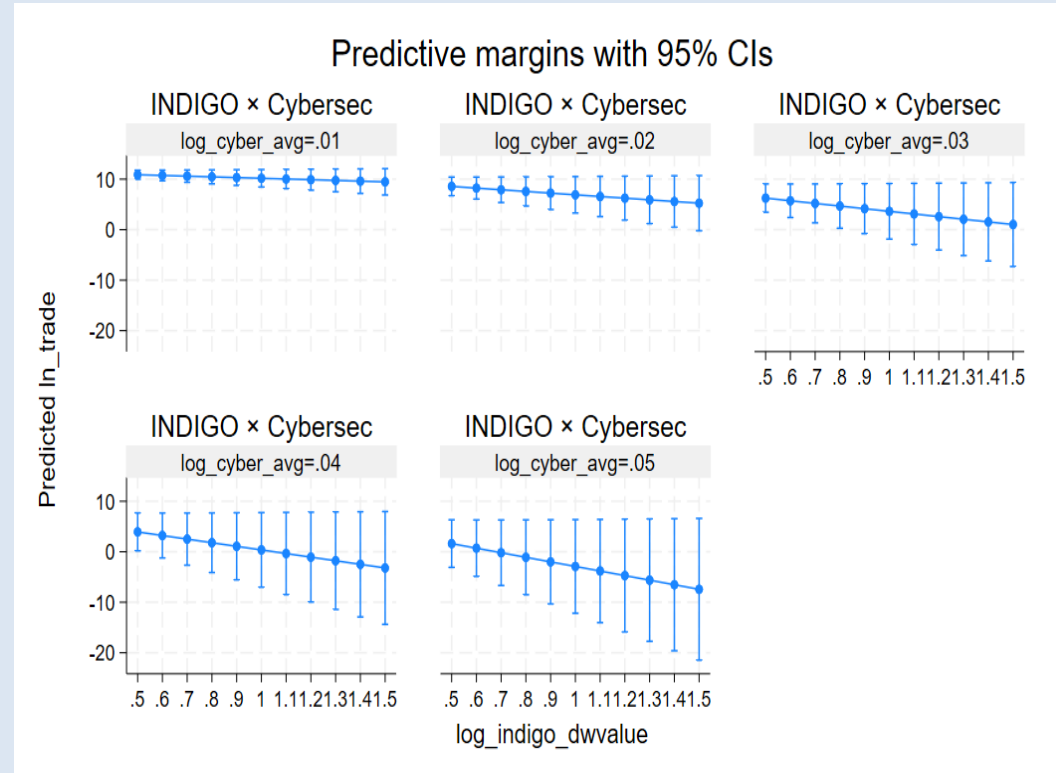
Impact on trade – A model to evaluate the impact on trade

- **Digital integration** agreements have a small positive effect on trade flows (endogeneity)
- **Tighter cybersecurity regulations** are associated with a negative impact on trade, possibly due to compliance costs and data restrictions
- **The interaction** term suggests that digital agreements mitigate some negative effects of strict cybersecurity rules.



Impact on trade – A model to evaluate the impact on trade

- Trade benefits from digital integration **decrease as cybersecurity requirements become stricter**
- At **low cybersecurity restrictiveness**, digital integration supports trade
- The effect shrinks as cyber regulations is being tightened



Geopolitical dynamics and regulatory divergence

The current regulatory frameworks of the three major trading blocks reflect their respective core values leaving little room to negotiate a possible enhanced integration

Jurisdiction	Sovereignty Model	Free Flow of Data	Ban on Data Localization	Regulatory Focus
USA	Firm Sovereignty	✓ Yes	✓ Yes	Commercial freedom, privacy as consumer right
China	State Sovereignty	✗ No	✗ No	National security, centralized control
EU	Individual Sovereignty	✓ Yes*	✓ Yes*	Privacy as a fundamental right (GDPR)

Source: Gao (2002).

- **Geopolitical Polarization:**
 - EU and China locked in a “**digital limbo**”: dialogue exists, but trust deficit persists
 - **US–China rivalry accelerates bifurcation** of standards (AI, 5G, data governance)
- **EU’s Strategic Shift:**
 - European Defence Readiness 2030 and Preparedness Union Strategy sees **cybersecurity as core of security policy**
 - **Push for resilience**, AI regulation, and supply chain security
- **Future Outlook:**
 - **Risk of a Digital Cold War** with competing blocs
 - **Possible emergence of regional digital compacts** (e.g., EU–Japan, DEPA)
 - **Firms face rising compliance costs** and need for multi-regime strategies

Source: Vanberghen (2025a, 2025b) and Stallkamp (2021).

Conclusion

- **Cybersecurity will be a ground for economic diplomacy in the foreseeable future**
 - Notwithstanding the significant effort to integrate it into trade agreements, the room to “weaponize” is wide
- **MNCs may end up caught in the cross-fire**
 - Compliance costs and the possibility of web segregation may limit considerably the extent of their operations and innovation capability
- **Trade gains from higher integration in the cyber domain, possibly offsetting some of the extra costs arising from diverging cyber regulation frameworks**
- **Perspectives for enhanced cooperation in cyber domain are all but bright**

THANK YOU FOR YOUR ATTENTION

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