
Legal Approaches to Cross-Border E-Commerce Consumer Protection in Indonesia, Singapore, and China

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ABSTRACT: This article examines consumer protection in cross-border e-commerce, focusing on Indonesia, Singapore, and China. The rapid growth of digital commerce across borders poses significant challenges for national legal systems in safeguarding consumer rights effectively. This study employs a normative juridical approach with qualitative-comparative analysis, exploring relevant legislation, policies, and law enforcement practices in the three countries. The findings reveal that Singapore has established the most comprehensive consumer protection legal framework, closely aligned with international standards. China utilizes a centralized regulatory model that emphasizes platform liability, resulting in stricter oversight of digital transactions. In contrast, Indonesia struggles with fragmented regulations, limited policy integration, and weak law enforcement, leading to less effective consumer protection in cross-border e-commerce. The study concludes that harmonizing international consumer protection standards and strengthening national law enforcement are crucial to addressing the challenges of cross-border e-commerce. Enhanced regulatory cooperation and improved consumer digital literacy are also necessary to ensure effective protection in digital markets.

Keywords: E-commerce, Consumer Protection, Comparative Law, ASEAN, Cross-Border Regulation.



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INTRODUCTION

E-commerce has become a major force in the transformation of the global economy, enabling easy cross-border digital transactions and providing great convenience to consumers (Sari (2022)). However, this development also presents new legal challenges, especially regarding consumer protection in

crossborder transactions (Gonzalez, 2021) Unlike conventional trade, digital transactions often involve parties from different legal jurisdictions (Chen & Zhang, 2019). As highlighted by (Dewi, 2021) regulatory discrepancies across Asian countries contribute significantly to cross-border consumer protection challenges. Indonesia, Singapore and China are three of the fastest growing e-commerce markets in Asia, but have different regulatory approaches. Indonesia relies on Law No. 8/1999 and Government Regulation No. 80/2019 as its legal basis, but has yet to address the complexity of cross-border digital transactions (Budi & Sari, 2020) Issues such as online fraud, data abuse, and low product transparency are still rampant, exacerbated by weak law enforcement mechanisms and cross-border cooperation. (Harahap, 2019; Hassan & Imran, 2021)

In contrast, Singapore has developed a more responsive legal system through the Consumer Protection (Fair Trading) Act that is integrated with ASEAN digital trade initiatives (Setiawan, 2022). Proactive enforcement mechanisms, including CASE and online arbitration, strengthen the consumer dispute resolution process (Chua, 2018; Koh, 2017) Meanwhile, China's regulatory model, strengthened through the 2019 E-commerce Law, emphasizes platform responsibility and a comprehensive internal dispute resolution system (Wang, 2020; Zhou & Wang, 2020) However, access to justice for foreign consumers is still limited (Yao, 2020). The selection of Indonesia, Singapore, and China is based not only on their digital market size but also on their distinct legal traditions—civil law, common law, and socialist law respectively. These legal traditions shape their regulatory philosophy, institutional frameworks, and enforcement mechanisms. Therefore, comparing them offers valuable insights into how different legal systems respond to the same global e-commerce challenges.

In practice, the lack of effective cross-border consumer protection leads to unresolved disputes and economic losses. For instance, Indonesian consumers often struggle to get redress from overseas sellers due to unclear jurisdiction and absence of cooperation frameworks. These issues highlight the importance of developing interoperable legal systems and coordinated enforcement strategies. The absence of a binding international legal framework further complicates consumer protection in e-commerce. While global guidelines such as the UNCTAD Recommendations provide normative principles, their implementation in individual countries still varies widely (Liu, 2022; O.E.C.D., 2019; U.N.C.T.A.D., 2020). As a result, consumers are often trapped in legal uncertainty without adequate dispute resolution mechanisms at the international level. (Lim, 2021)

ASEAN has initiated regional initiatives such as the ASEAN Agreement on Electronic Commerce and efforts to align consumer protection policies. However, implementation remains fragmented. Stronger legal harmonization and institutional coordination are needed to ensure that consumer protection does not stop at national borders. Lee (2018) This research aims to conduct a comparative legal analysis of consumer protection in e-commerce in Indonesia, Singapore and China. By highlighting the strengths and weaknesses of each system, this research contributes to the policy discourse on legal harmonization and strategies for strengthening cross-border consumer protection mechanisms (Baker & Lee, 2020; Ismail, 2021)

METHOD

This research uses a normative legal research approach with qualitative and comparative methods. Normative legal research focuses on analyzing legal norms, legislation, and doctrinal interpretations relevant to consumer protection in cross-border ecommerce transactions (Liu, 2022). The qualitative approach enables a deeper understanding of the textual meaning and policy implications of legal frameworks, while the comparative method is used to evaluate similarities, differences, and best practices among Indonesia, Singapore, and China. (Chen & Zhang, 2019; Zhou & Wang, 2020).

Fourth, the institutionalization of regional dispute resolution mechanisms such as an ASEAN Online Dispute Resolution (ODR) center could significantly reduce jurisdictional uncertainty and enhance access to justice. This initiative could build on Singapore's experience with ODR and China's experimentation with online arbitration platforms. Fifth, increased investment in consumer education and digital literacy campaigns is essential to close the awareness gap that exists in countries like Indonesia. These campaigns should be culturally tailored and multilingual to cater to diverse populations. Sixth, ASEAN should consider establishing a centralized platform accreditation scheme to certify e-commerce platforms that meet minimum standards of consumer protection, thereby fostering trust and encouraging best practices across borders. (Nuraini, 2023)

This research is classified as doctrinal legal research supported by comparative legal methods. This research systematically examines the written regulations and policies governing e-commerce consumer protection in three different legal systems: the civil law legal system in Indonesia, the common law tradition in Singapore, and the socialist legal system in China (Baker & Lee, 2020). The comparative legal approach in this study does not only involve examining the textual content of laws, but also evaluates the practical enforcement in each jurisdiction. This includes an assessment of institutional capacity, policy implementation, and legal accessibility. Each legal system's response is contextualized based on its underlying legal tradition and digital policy framework. This allows for a more nuanced understanding of how similar challenges in cross-border e-commerce are addressed differently across systems.

This study does not involve human participants or fieldwork, and thus does not require ethical clearance. The data used are entirely secondary legal materials, including statutory texts, government regulations, institutional reports, journal articles, and international guidelines (O.E.C.D., 2019; U.N.C.T.A.D., 2020).

The research was conducted as a desk study with online data collection through government websites, academic databases (such as HeinOnline, Scopus, Google Scholar), and institutional publications from UNCTAD and OECD. This research specifically focuses on legal materials from Indonesia, Singapore and China (Hassan & Imran, 2021).

The main tool in this study is a document analysis framework that evaluates the following indicators

1. The substantive legal scope of consumer protection regulations in e-commerce;

2. The availability and accessibility of dispute resolution mechanisms
3. The degree of alignment with international norms, especially the UNCTAD Guidelines (Ismail, 2021; Liu, 2022)

Data was collected by identifying, classifying, and synthesizing relevant legal documents and scientific literature. Purwanto (2022) Primary legal materials included national consumer protection laws and digital trade regulations, while secondary materials consisted of journal articles, policy analysis, and comparative legal studies (Chua, 2018; Koh, 2017)

Data were analyzed using content analysis to extract legal themes and regulatory concepts, and comparative legal analysis to evaluate the effectiveness and adaptability of each country's framework. Special attention was given to institutional enforcement capacity and platform liability models (Wang, 2020; Yao, 2020).

To maintain academic rigor, all sources were cross-referenced and validated for relevance and credibility. The research process adhered to the principles of academic integrity and transparency. To enhance analytical depth, this study also triangulates findings by cross-referencing legal texts with policy implementation data from international institutions, ensuring a more comprehensive evaluation of normative and practical dimensions of consumer protection.

Beyond legal frameworks, the socio-economic context significantly influences the effectiveness of consumer protection. In Indonesia, low digital literacy and limited awareness of legal rights contribute to consumers' vulnerability in cross-border transactions. Surveys conducted by the Ministry of Communication and Information in 2022 indicate that only 36% of Indonesian online shoppers are aware of legal recourse mechanisms. This contrasts with Singapore, where public outreach by CASE has led to a significantly higher awareness rate. China's government-led campaigns also increase consumer engagement and assertiveness in pursuing legal claims. These differences show how legal systems must be complemented by socio-educational initiatives to empower consumers in digital environments.

Another pressing issue is the legal uncertainty stemming from jurisdictional conflicts. E-commerce transactions often span multiple legal territories, creating ambiguity in applicable law and forum for dispute resolution. This poses challenges for both consumers and regulators. For instance, an Indonesian buyer purchasing goods from a Chinese seller on a Singapore-hosted platform faces a tripartite legal complexity. Currently, there is no binding ASEAN legal instrument to determine jurisdiction in such cases. (Rahman, 2023) Efforts toward an ASEAN Model Law for E-Commerce Dispute Resolution could offer a pathway to uniformity, inspired by UNCITRAL's work on cross-border legal harmonization.

Digital platforms are not merely passive intermediaries—they shape the consumer experience and the enforcement of legal rights. Major platforms like Lazada and Shopee have begun implementing internal compliance mechanisms such as product verification, seller blacklists, and embedded dispute

systems. However, these practices vary by country, leading to uneven consumer protection. Singapore's Infocomm Media Development Authority (IMDA) has issued detailed guidelines for platform accountability. Meanwhile, Indonesia has yet to formalize platform compliance obligations beyond voluntary codes. A regional code of conduct, aligned with international standards, could bridge these inconsistencies.

Emerging technologies offer new tools for strengthening consumer protection. Blockchain-based transaction ledgers can provide tamper-proof records of sales, enhancing transparency and enabling easier dispute verification. AI-powered dispute resolution systems, piloted in Singapore since 2023, automate basic consumer claims, reducing cost and time barriers. While these innovations are promising, their adoption requires legal adaptation. Indonesia must amend its Electronic Information and Transactions Law to accommodate digital signatures and automated resolutions. China, due to its top-down governance model, is more agile in integrating such technologies. Harmonizing legal recognition of these tools across jurisdictions will be vital to future regional cooperation.

RESULTS AND DISCUSSION

A thematic analysis of the legal documents and policy frameworks in the three countries revealed three main findings, namely:

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Regulatory Approach and Scope of Protection Law No. 8 Year 1999 on Consumer Protection in Indonesia guarantees basic consumer rights such as the right to security, information, and legal remedies. However, there are no specific clauses governing cross-border e-commerce.

For example, Article 4(c) only mentions consumers' right to "obtain correct, clear and honest information" without regulating the obligations of digital platforms or foreign sellers.

In contrast, Singapore through its Consumer Protection (Fair Trading) Act (CPTA) provides a strong protection mechanism. Section 4 prohibits unfair practices, while the 2012 Lemon Law amendments regulate substandard goods sold online. The Consumers Association of Singapore (CASE) facilitates dispute resolution through mediation and legal aid. China, through the E-Commerce Law of the PRC (2019), has a comprehensive legal framework. Article 9 requires e-commerce platform operators to verify the identity of businesses joining the platform and store data for inspection purposes. Article 45 requires platforms to take action when consumer rights are violated.

Comparative findings are summarized in the following table:

Table 1. Comparative Legal Framework on E-Commerce Consumer Protection

Legal Aspect	Indonesia	Singapore	China
Consumer Rights	General protection (Law No. 8/1999, Art. 4)	Protection against unfair practices (CPTA, Sec. 4)	Specific ecommerce rights (E-Commerce Law, Art. 17–20)
Platform Responsibilities	Not clearly defined	Implied under Lemon Law & consumer contracts	Mandatory verification and liability (Art. 9, Art. 38, Art. 45)
Dispute Resolution	Court-based, limited online access	CASE mediation and Small Claims Tribunals	Multiple channels: platform-led, administrative, judicial
Enforcement Capacity	Weak institutional coordination	Strong coordination via MTI & CASE	Centralized stateled enforcement
Alignment with UNCTAD Guidelines (2024)	Partial compliance with international norms	High compliance with international norms	Increasing compliance with international norms

For instance, in 2021, several Indonesian consumers filed complaints regarding counterfeit goods purchased from Chinese platforms. Due to the lack of jurisdictional agreements and limited access to dispute resolution, the cases remained unresolved, highlighting the need for bilateral or regional enforcement mechanisms. A more recent case in 2022 involved Indonesian consumers purchasing electronic goods from foreign sellers via online marketplaces. Despite making timely payments, the goods were never delivered. The marketplace denied liability on the grounds that the seller was not a verified domestic partner. With no bilateral agreement in place and limited access to international legal remedies, the consumers had no recourse. In contrast, similar cases in Singapore have been addressed more efficiently through CASE and small claims tribunals, demonstrating the effectiveness of a coordinated institutional framework. In China, although platform liability is strictly enforced under domestic law, linguistic and procedural barriers often hinder foreign consumers from pursuing legal claims.

Interpretation of Findings

From the comparative table above, it appears that Singapore has the most harmonized and enforceable consumer protection framework, particularly through the use of alternative dispute resolution and

platform accountability. China's legal system reflects a strong administrative model, with a focus on platform liability and consumer remedies. Meanwhile, Indonesia's legal framework remains fragmented and has not kept pace with the development of digital commerce. Similar regulatory weaknesses are noted by (Fitriani, 2020) especially regarding the lack of consumer complaint mechanisms and legal awareness in online trade.

Interpretation of Key Findings

The results show significant differences in legal approaches to e-commerce consumer protection in Indonesia, Singapore, and China. Indonesia continues to rely on Law No. 8/1999, which provides only general consumer rights and lacks specificity for digital and cross-border transactions. This limitation has resulted in regulatory fragmentation and weak enforcement, making it difficult to address issues such as platform liability or foreign seller accountability. In contrast, Singapore adopts a more adaptive and consumer-centric approach through the Consumer Protection (Fair Trading) Act (CPTA), supported by CASE and small claims tribunals, enabling effective dispute resolution even in cross-border scenarios. China, meanwhile, demonstrates a centralized and proactive regulatory model under the 2019 E-Commerce Law. This law mandates platforms to verify merchant identities, retain transaction data, and take direct responsibility for consumer protection. Such legal asymmetry among the three countries creates uneven levels of consumer trust, legal certainty, and access to remedies. (A. H. Tan, 2018)

These findings underscore the urgent need for legal harmonization and platform accountability mechanisms that are interoperable across jurisdictions (Soeharto, 2019). In addition to the legal frameworks described above, another critical aspect in cross-border e-commerce is the practical role of dominant digital platforms such as Shopee, Lazada, and Alibaba. These platforms operate across jurisdictions, yet they adapt differently to each country's legal landscape. For example, Singapore enforces clear requirements regarding return policies and seller transparency, while in Indonesia, such obligations are often ambiguously defined or inconsistently applied. In contrast, China imposes explicit and enforceable duties on platforms under Articles 9 and 84 of its E-Commerce Law, including mandatory merchant verification and the removal of infringing content.

One of the most pressing challenges in practice is legal uncertainty over jurisdiction. Indonesian consumers often encounter difficulties in determining where to lodge complaints—domestically or through the platform's country of origin—leading to unresolved grievances. While Singapore facilitates online mediation under ASEAN initiatives, the lack of binding regional instruments hampers effective resolution. China's centralized enforcement mechanism, although robust, remains largely inaccessible to foreign claimants.

Fourth, the institutionalization of regional dispute resolution mechanisms such as an ASEAN Online Dispute Resolution (ODR) center could significantly reduce jurisdictional uncertainty and enhance access to justice. This initiative could build on Singapore's experience with ODR and China's

experimentation with online arbitration platforms. Fifth, increased investment in consumer education and digital literacy campaigns is essential to close the awareness gap that exists in countries like Indonesia. These campaigns should be culturally tailored and multilingual to cater to diverse populations. Sixth, ASEAN should consider establishing a centralized platform accreditation scheme to certify e-commerce platforms that meet minimum standards of consumer protection, thereby fostering trust and encouraging best practices across borders.

Furthermore, the level of institutional support significantly impacts consumer outcomes. Singapore, through CASE and its public outreach programs, enhances legal literacy and consumer empowerment. Meanwhile, Indonesia's institutional framework lacks the same proactive engagement, leaving consumers with limited guidance in resolving cross-border issues. These practical gaps reinforce the disparities among the three countries' legal systems and highlight the importance of not only statutory reform but also institutional strengthening to ensure effective implementation. (Wijaya, 2019)

Fourth, the institutionalization of regional dispute resolution mechanisms such as an ASEAN Online Dispute Resolution (ODR) center could significantly reduce jurisdictional uncertainty and enhance access to justice. This initiative could build on Singapore's experience with ODR and China's experimentation with online arbitration platforms. Fifth, increased investment in consumer education and digital literacy campaigns is essential to close the awareness gap that exists in countries like Indonesia. These campaigns should be culturally tailored and multilingual to cater to diverse populations. Sixth, ASEAN should consider establishing a centralized platform accreditation scheme to certify e-commerce platforms that meet minimum standards of consumer protection, thereby fostering trust and encouraging best practices across borders.

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These issues affirm that consumer protection frameworks must evolve beyond mere legislative adoption, requiring coordinated regional strategies and adaptive institutional responses. These comparative findings suggest several policy implications.

Policy Implications

These comparative findings suggest several policy implications. First, Indonesia must prioritize legal updates to close the regulatory gap. Second, ASEAN institutions could play a greater role in setting binding regional norms for e-commerce consumer protection. Third, platforms operating regionally should be encouraged to adopt uniform compliance standards regardless of jurisdiction. These steps are essential not only to improve consumer trust but also to foster a more integrated and resilient digital economy in the region.

Comparison with Previous Studies

This finding is in line with (Zhou & Wang, 2020) study, which emphasizes that the success of e-commerce consumer protection depends heavily on regulatory clarity and law enforcement capacity (Harahap, 2019) also highlights the weaknesses of the Indonesian system due to low digital literacy and weak enforcement mechanisms. (E. Tan, 2021) argues that effective legal remedies for cross-border fraud require strong regional coordination, especially within ASEAN legal systems. By comparing three different jurisdictions, this article contributes to the literature that confirms the importance of a dynamic and contextual legal approach in dealing with global e-commerce challenges. (Fadhilah, 2021)

Research Limitations

This research has several limitations. First, it is descriptive and qualitative in nature, so it does not measure the effectiveness of legal protection quantitatively. Second, limited access to judicial data, especially in China, limits a comprehensive mapping of law enforcement outcomes. Third, the study only covers three Asian jurisdictions, so the findings cannot be generalized to other regions such as Europe or Latin America.

In addition, the study reveals that consumer protection in cross-border e-commerce must extend beyond formal legal texts to include infrastructure for dispute resolution, institutional support, and consumer empowerment. Digital platforms play a pivotal role in this ecosystem, and their responsibilities should be codified and enforced through multilateral agreements. Regulatory sandboxes, already in use in Singapore, can serve as models for piloting legal innovations in Indonesia and other ASEAN countries. To future-proof the legal architecture, ASEAN and its member states should invest in adaptive legal design—legal systems that evolve in tandem with technological advancement and market shifts. Only through such integrative and forward-thinking measures can cross-border consumer protection be effectively ensured.

Recommendations for Future Research

Future research should expand the geographical coverage to gain a broader global perspective. Comparative studies that incorporate empirical data, such as the number of complaints, dispute resolution rates, and consumer satisfaction levels, would provide stronger insights into the effectiveness of each legal system. The role of new technologies in strengthening consumer protection frameworks across countries should also be investigated further. (Zhang, 2020)

CONCLUSION

This study aims to analyze and compare the legal frameworks governing consumer protection in cross-border e-commerce in Indonesia, Singapore, and China. The findings show that Singapore offers the most comprehensive and adaptive legal structure, supported by well-functioning institutions and regional integration efforts. China, while not part of ASEAN, demonstrates strong regulatory control through platform-based obligations and centralized enforcement. Indonesia, on the other hand, still faces challenges of fragmented legislation, weak institutional capacity, and limited alignment with international standards. These comparative insights highlight the urgent need for harmonization of consumer protection policies across jurisdictions, particularly within regional frameworks like ASEAN. Enhancing platform accountability, streamlining dispute resolution mechanisms, and improving digital literacy are essential to protect consumers in the evolving e-commerce landscape.

The legal disparities between the three countries indicate the necessity for an integrated regional mechanism that transcends national borders. As digital markets become increasingly interconnected, cross-border consumer protection must be supported not only by harmonized legislation but also by interoperable enforcement protocols. One major legal implication is the potential adoption of a binding ASEAN Digital Consumer Protection Agreement, building upon existing soft law instruments. If realized, such a framework could help standardize platform liability, strengthen mutual legal assistance, and reduce jurisdictional ambiguity that hinders effective redress for consumers. Looking ahead, the evolution of AI-driven dispute resolution systems and blockchain-based consumer complaint records may revolutionize how cross-border digital disputes are handled. Countries with adaptive legal ecosystems like Singapore are well-positioned to embrace these innovations quickly. Conversely, Indonesia must first resolve its regulatory fragmentation and build institutional capacity to avoid being left behind in the regional digital legal landscape.

Looking forward, legal frameworks in the ASEAN region may benefit from embracing digital legal technologies such as blockchain-based transaction records and AI-assisted dispute resolution. Singapore has already initiated regulatory sandboxes to explore the application of these innovations. A region-wide agreement—such as a binding ASEAN Digital Consumer Protection Treaty—could standardize minimum platform obligations and clarify cross-border enforcement procedures. Such developments would enhance trust in digital commerce and reduce the legal uncertainty currently faced by consumers across jurisdictions. This study contributes to the academic discourse by

emphasizing the importance of legal coherence and transnational cooperation in safeguarding digital consumer rights. It also provides a foundation for future research and policy development aimed at building a more inclusive, trusted, and resilient digital market environment across borders.

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