Armenia and the Eurasian-European Digital Divide

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On 24 November 2017, representatives of Armenia and the European Union signed a landmark treaty along the sidelines of the Eastern Partnership summit in Brussels. Known as the Comprehensive and Enhanced Partnership Agreement, the document represents one of the most ambitious initiatives from the European Union with regards to the South Caucasus. Alongside enhancing political cooperation between Brussels and Yerevan, this treaty carries many implications for trade between Armenia and the European Union – particularly in relation to the digital economy. Yet, as a full-member of the Eurasian Economic Union, Armenia has found itself caught between two competing standards of digital integration. This paper will highlight the differing aspects of digital policies in the European Union and Eurasian Economic Union and how Armenia’s membership obligations to the Eurasian Economic Union might conflict with its digital partnership with the European Union.

Keywords: CEPA, Digital, EAEU, EU, Armenia
1. Introduction

As an active participant in the European Union’s (EU’s) Eastern Partnership initiative and full member of the Eurasian Economic Union (EAEU), Armenia has maintained a delicate balance in its partnerships with both Moscow and Brussels. Recently, however, the growing legitimation of an emerging area of industry – the digital economy – began to pose challenges to this balance. The focus of this policy paper is the legal aspects of digital integration in the EU and EAEU, and how these processes may conflict with one another with regards to the digital policies of the Republic of Armenia. Considering the importance of the IT sector to the Armenian economy, the process made in the development of the “European Digital Single Market” and the emerging digital policies of the Eurasian Economic Union, this topic seems of particular relevance to Armenia’s digital policies in the context of competing integration regimes.

This paper will feature brief reviews of the digital integration processes of both the EU and EAEU, as well as digital integration projects between the EU and the Republic of Armenia. The goal is to provide readers with a sense of the potential divergences in European and Eurasian digital integration and how this may impact Armenia’s current status as a digital partner of the EU. The main treaty used in this analysis is the Comprehensive and Enhanced Partnership Agreement between the Republic of Armenia and European Union1. This paper also utilizes an exploratory study commissioned by the TAX3 committee of the European Parliament, titled “Cryptocurrencies and blockchain - Legal context and implications for financial crime, money laundering and tax evasion”2. Beyond treaty law and this exploratory investigation, this paper utilizes a variety of consultations, assessments, and independent analyses in order to provide insight into the digital integration processes in Armenia, the EU, and EAEU, and what complications would arise in this process. The most noteworthy of these studies is titled “The EAEU 2025 Digital Agenda: Prospects and Recommendations”, published as a joint effort between the World Bank and Eurasian Economic Commission.

2. The EU and the Digital Economy

The term “digital economy” refers to a variety of emerging industries related to software and information systems. Some examples of digital goods and services include the development of software and the hosting, storage, and processing of data. Digital goods also include cryptocurrencies, verification “tokens”, and other forms of intangible digital assets. The digital economy is closely tied to the concept of “Industry 4.0”, which may refer to the incorporation of artificial intelligence and predictive algorithms in business operations, the automation of manufacturing and industry, and the connection of everyday objects to the internet (known as the “internet of things”) (European Parliament, 2016). While the products of electronic commerce may be intangible, a healthy digital industry will be necessary to maintain a competitive economy in the coming years.

Since 2014, the EU has moved to incorporate elements of the digital economy into the European Single Market as part of a “Digital Single Market”. The Digital Single Market is built around a collection of policies and regulations from the European Commission that relate to the proper storage of

sensitive and personal data, the removal of geo-blocking and other barriers in digital trade between EU members, and the improvement of digital infrastructure throughout the EU (European Commission, 2017). One of the most important elements of the Digital Single Market is the General Data Protection Regulation (GDPR). The GDPR is a regulation designed to control what sort of sensitive and personal data may be gathered of EU citizens and how this information may be utilized by a non-EU firm (Journal of the European Union, 2016). The GDPR was created as an adaptation of the 1995 Directive 95/46/EC – known as the “Data Protection Directive” – in response to drastic changes in data collection over the past 20 years.

Beyond topics like personal data regulations and geo-blocking, the EU has turned an increasing amount of attention towards the introduction of tax revenue and more conventional elements of financial policy in the realm of digital industry. A proposed council directive from the European Commission, titled “Council Directive on the common system of a digital services tax on revenues resulting from the provision of certain digital services”, has outlined not only the necessity of a proper tax policy towards elements of the digital economy and the legal frameworks on which it depends, but also includes a proposed policy known as the Digital Services Tax (DST) that would assist in determining the value and amount of tax gathered from activities such as streaming, data processing, and other intangible services in addition to electronic commerce (European Commission, 2018).

Beyond the Commission’s proposed directive on the introduction of a DST, the TAX3 committee of the European Parliament released a report on the policy implications of the usage of crypto-currencies. One of the major focuses of this report was the adequacy of the EU’s instruments in combatting fraud, tax evasion, and money laundering via cryptocurrencies. The particular instrument of interest to the Parliament’s report was the most recent revision of the anti-money laundering directive (AMLD5). Although crypto-currencies are affected by a rapid pace of innovation and their usage includes a wide latitude of legal concerns, the report concluded that AMLD5 featured adequate definition of crypto-currencies and the EU was adequately prepared to approach the taxation and regulation of crypto-currencies – meaning that in the coming years we may expect the formation of appropriate monetary policy towards crypto-currencies (Jan, 2018).

3. The EAEU and the Digital Economy

In recent years, individual members of the EAEU have developed national policies towards the legitimization of digital industry and the digital economy. One of the most prominent EAEU members in this trend is Belarus. The signing of the “Decree on Development of the Digital Economy” on 21 December 2017 not only codified the development of the Belarussian digital economy into legal text, but anchored the digital economy into a physical, tangible space. The decree formally designates the Park of High Technologies as a special economic zone and provides a variety of incentives to any tech companies residing in its territory. More importantly, the Decree on Development of the Digital Economy outlines the legalities involving the usage of crypto-currencies and block-chain technologies among the parks’ residents. This decree includes relevant legal definitions (such as “token”, “smart contract”, and “mining”) and a framework for taxation in which income generated

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from the production and trade of crypto-currencies is subject to a value added tax that will take effect in 2023 (Office of the President of the Republic of Belarus, 2018).

Compared to the EU, the EAEU has yet to develop a comprehensive set of policies towards digital industry. However, the Eurasian Economic Commission has organized a variety of exploratory activities towards the research and development of a union-wide digital economic policy. One of the most noteworthy of these efforts is the joint EAEU-World Bank study titled “The EAEU 2025 Digital Agenda: Prospects and Recommendations”. This study includes a summary of the wide impact of digitization on the individual economies of the EAEU, as well as the legal and infrastructural deficiencies that hamper the process of digital integration. Target projects for the process of Eurasian digital integration include the creation of shared platforms for public procurement within the EAEU’s internal market and the exchange of geospatial information, the digitization of transport corridors and logistics networks, and a pilot program for the exchange of electronic documents between EAEU members (World Bank, 2018). The study frames the development of Eurasian digital policies as the product of two groups – the Eurasian Economic Commission, and the five individual members of the EAEU holding unanimous approval towards a policy. This dynamic would ideally be coupled with private-public partnerships throughout the union, as well as the individual policies enacted by EAEU members.

While the study makes several references to the digital spaces of regional bodies like the EU and ASEAN as possible models for the Eurasian digital space, this should not be interpreted as an overt promotion of compatibility or harmonization. Just as the similarities between the interstate organs of the EAEU and EU do not equate to compatibility between both blocs’ standards of economic and political integration, it is entirely reasonable that EAEU and EU digital policies conflict with one another despite a similar models of policy creation and implementation.

4. Trends in Armenian Regional Integration After 1991

Since gaining independence, Armenia has held generally warm relations with the EU. While its geography has kept it distant from Europe, Armenia’s extensive European diaspora and deep historic ties to the western world have maintained the country’s political relevance to Brussels. The cornerstone of Armenia’s relationship with the EU is the 1996 Partnership and Cooperation Agreement (PCA). Although Armenia held diplomatic ties to individual members of the EU, the PCA was designed to normalize relations between Armenia and the supranational structures of the EU. Beyond establishing the broader areas of cooperation between Yerevan and Brussels, the PCA granted Armenia “most-favored-nation” status on certain goods in exchange for compliance with EU regulations such as the Protected Designation of Origin (PDO). This meant that Armenian goods had to comply with European naming conventions when sold in European markets – a somewhat controversial development, as initially Armenian cognac could no longer be sold as “cognac” in the EU as it did not come from the region of Cognac, France (Schleifer, 2013). Through ratifying the PCA and complying with European naming conventions, Armenia was granted a degree of access to the Single Market that did not require a free trade agreement or participation in the European Customs Union.

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5It was later ruled that Armenian Cognac may be labeled “Cognac” in the EU, so long as the label was not in Latin script.
While the PCA was successful in laying the foundation of Armenia-EU relations, the narrow scope of the treaty and the geopolitical reality of the South Caucasus limited bilateral engagement between Armenia and the EU throughout the 1990s and much of the 2000s. The war in Nagorno-Karabakh led to the sealing of Armenia’s eastern and western borders by Azerbaijan and Turkey. Turkey’s closure of its border with Armenia drastically inhibited Armenia’s access to the EU’s single market (Tocci, 2007) via the Customs Union between Turkey and the EU. With the only remaining viable borders after the start of the Karabakh conflict being the southern border with Iran and the northern border with Georgia, Armenia would spend much of the 1990s and 2000s pursuing a close economic and security partnership with the Russian Federation. The Russian military installations in Gyumri and Yerevan provide Armenia a guarantee of security against regional security challenges while Armenia’s membership in the Commonwealth of Independent States (CIS) Free Trade Area (CISFTA) keeps its economy closely tied to Russia and the post-Soviet space. This cooperation built out of the necessity of the early 1990s and perpetuated through the lack of progress towards peace in the South Caucasus solidified Armenia’s relationship as a dependent of the Russian Federation.

Armenia’s relationship with the Russian Federation was not initially considered an obstacle in its relations with the EU. However, the gradual deterioration of relations between Russia and the EU in the late 2000s (particularly in the aftermath of the Russo-Georgian War) placed Armenia on a geopolitical fault line. Few events encapsulate the impact of the tension between Russia and the western world in Armenia better than the abrupt cancellation the 2013 Association Agreement. Armenia was one of several members of the Eastern Partnership expected to sign an EU Association Agreement in 2013. In addition to fostering closer political cooperation and harmonization of legal standards between both parties, this agreement would include Armenia in a Deep and Comprehensive Free Trade Area with the EU and initiate dialogue towards visa liberalization and possible visa-free travel in the future. Armenia’s participation in the Eastern Partnership and the negotiation of this agreement happened in parallel to the development of a competing regional integration regime by the Russian Federation. In 2010, the Customs Union of Belarus, Kazakhstan, and Russia was established, representing the first major integration effort in the post-Soviet space since the CIS. This project would later take the formal name “Eurasian Economic Union” and by 2013 offered a model of integration that was in competition with the EU. Despite negotiations on the treaty having been completed, Armenia abruptly cancelled the Association Agreement with the EU and instead opted for membership in the EAEU - a decision that is often attributed to direct, intense pressure from Moscow (Gardner, 2013). Instead of possibly reorienting trade policy towards the EU like its northern neighbor Georgia, Armenia would instead continue its trajectory of economic dependency on the Russian Federation.
5. CEPA and the Digital Economy

5.1. Background on CEPA

CEPA represents a valuable opportunity to both salvage Armenia’s relationship with the EU and modernize and adapt its economy to recent trends. Although trade with the EU has largely revolved around mining and resource extraction (European Commission, 2016), the explosive emergence of Armenia’s IT sector in recent years has opened the possibility of the expansion of Armenian-European trade into an emerging area of industry. The development of a strong Armenian digital economy presents several benefits to the EU. First, it would open the possibility of wider cooperation between Armenian and European firms. Given the recent efforts by the Armenian government to solidify Armenia’s role as a major IT center in the South Caucasus, it is possible that Armenia may follow Ukraine’s path and become a lucrative destination for European firms seeking cost-effective skilled labor. There is also the possibility that the development of the Armenian digital economy may partially stem the emigration of skilled Armenian labor by providing greater opportunities for employment inside the country. Most importantly, because the EAEU has yet to develop a policy or comprehensive strategy towards the digital economy, Armenia and the EU have a wide latitude of cooperation and trade in this particular sector of industry without being encumbered by conflicting integration standards.

5.2. Digital Industry as a Service

One of CEPA’s noteworthy chapters regarding the digital economy is Chapter 5: “Trade in Services, Establishment, and Electronic Commerce”. The purpose of this chapter is to develop legal precedent for the liberalization of services between Armenia and the EU. This process is explicitly limited to not interfering with either party’s immigration policies, but instead designed to minimize any barriers to trade with regards to the movement of services between Armenia and the EU. Article 149 – Market Access – establishes the following legal standard:

1. **With respect to market access through the cross-border supply of services, each Party shall accord services and service suppliers of the other Party treatment not less favorable than that provided for in the specific commitments contained in Annexes VIII-B and VIII-F.**

2. **In sectors where market access commitments are undertaken, each Party shall not adopt or maintain, either on the basis of a regional subdivision or on the basis of its entire territory, unless otherwise specified in Annexes VIII-B and VIII-F, the following measures:**

   (a) limitations on the number of services suppliers, whether in the form of numerical quotas, monopolies, exclusive service suppliers or the requirements of an economic needs test;
   (b) limitations on the total value of service transactions or assets in the form of numerical quotas or the requirement of an economic needs test; or
   (c) limitations on the total number of service operations or on the total quantity of service output expressed in terms of designated numerical units in the form of quotas or the requirement of an economic needs test.

   *(Comprehensive and Enhanced Partnership Agreement, 2017)*
This is followed by Article 150 – National Treatment:

1. *In the sectors for which market access commitments are inscribed in Annexes VIII-B and VIII-F, and subject to any conditions and qualifications set out therein, each Party shall grant to services and service suppliers of the other Party, in respect of all measures affecting the cross-border supply of services, treatment no less favorable than that it accorded to its own like services and service suppliers.*

2. *A Party may meet the requirement of paragraph 1 by according to services and service suppliers of the other Party treatment that is either formally identical or formally different from that accorded to its own like services and service suppliers.*

3. *Formally identical or formally different treatment shall be considered to be less favorable if it modifies the conditions of competition in favor of services or service suppliers of the Party compared to like services or service suppliers of the other Party.*

4. *Specific commitments assumed under this Article shall not be construed as requiring any Party to compensate for inherent competitive disadvantages which result from the foreign character of the relevant services or service suppliers.*

(Comprehensive and Enhanced Partnership Agreement, 2017)

These articles are significant in that they push for a mutual equal access to markets for service providers in Armenia and the EU, as well as prescribing equal legal treatment of Armenian and European service providers in either party. When we consider the inclusion of “Subsection III – Computer Services” in this chapter, we can see an area of particular relevance to the Armenian digital economy:

**Article 163 - Understanding on computer services:**

1. *In liberalizing trade in computer services in accordance with Sections B, C and D, the Parties shall comply with the paragraphs 2 to 4.*

2. *The Central Product Classification (CPC1) 84, which is the United Nations code used for describing computer and related services, covers the basic functions used to provide all computer and related services: computer programmes defined as the sets of instructions required to make computers work and communicate (including their development and implementation), data processing and storage, and related services, such as consultancy and training services for staff of clients. Technological developments have led to the increased offering of such services as a bundle or package of related services that can include some or all of those basic functions. For example, services such as web or domain hosting, data mining services and grid computing each consist of a combination of basic computer services functions.*

3. *Computer and related services, regardless of whether they are delivered via a network, including the internet, include all services that provide:*
a. consulting, strategy, analysis, planning, specification, design, development, installation, implementation, integration, testing, debugging, updating, support, technical assistance or management of or for computers or computer systems;

b. computer programmes defined as the sets of instructions required to make computers work and communicate (in and of themselves), plus consulting, strategy, analysis, planning, specification, design, development, installation, implementation, integration, testing, debugging, updating, adaptation, maintenance, support, technical assistance, management or use of or for computer programmes;

c. data processing, data storage, data hosting or database services;

d. maintenance and repair services for office machinery and equipment, including computers; or,

e. training services for staff of clients, related to computer programmes, computers or computer systems, and not elsewhere classified.

4. Computer and related services enable the provision of other services, such as banking, by both electronic and other means. In such cases it is important to distinguish between the enabling service, such as web-hosting or application hosting), and the content or core service, such as banking, that is being supplied electronically. In such cases, the content or core service is not covered by CPC 84. (Comprehensive and Enhanced Partnership Agreement, 2017)

These clauses contain major implications for digital trade between Armenia and the EU – primarily that the activities associated with the digital economy (including “data processing, data storage, data hosting”, among other activities) are formally considered to be services and subject to the same liberalization process listed throughout this chapter. When we combine this to the earlier mentioned equal treatment of Armenian and European firms in the bilateral trade of services, we can see that the ratification of CEPA has the potential to partially integrate Armenia’s digital economy to the EU’s Single Digital Market to a higher degree than a typical third-party partner.

5.3. Framework for Compliance with European Digital Standards

One of the core necessities in Armenian-European digital trade is Armenian compliance with European standards for data protection and copyright enforcement. Mutual effectiveness in copyright enforcement and other legal elements of digital trade is one of the more fruitful areas of economic integration derived from CEPA, as this process is not nearly as restricted as Armenian adoption of EU standards in other areas of industry. It is critical that Armenian firms are capable of upholding directives and protocols from the EU regarding the collection and storage of personal data -- such as the GDPR – as failure to do so may jeopardize this service liberalization process and incur financial penalty. Additionally, without the ability to defend intellectual property and uphold copyright protection laws, Armenia will remain unattractive for investment and co-operation from European parties.

CEPA contains a reference to what sort of frameworks should be followed in order to ensure full compliance with European data standards. Chapter 8, Article 62 outlines the broader areas of EU-Armenia ties with regards to “Cooperation in the Field of the Information Society”, while Article 63 contains the following clauses:

*Chapter 8, Article 63:*
Cooperation shall cover, inter alia, the following subjects:

(a) the exchange of information and best practice on the implementation of national information society strategies, including, inter alia, initiatives aimed at promoting broadband access, improving network security and developing public online services;

(b) the exchange of information, best practices and experience to promote the development of a comprehensive regulatory framework for electronic communications and, in particular, to strengthen the administrative capacity of the national independent regulator, to foster a better use of spectrum resources and to promote interoperability of networks in the Republic of Armenia and with the European Union.

(Comprehensive and Enhanced Partnership Agreement, 2017)

One of the key elements of this clause is the recommendation towards the “...development of a comprehensive regulatory framework for electronic communications”. It is likely that this regulatory framework would be generated through dialogue between the European Commission and the Armenian Ministry of Transport, Communication and Information Technologies. In addition to recommending the development of regulatory frameworks, this article also features references to the development of communication infrastructure, including “...promoting broadband access, improving network security, and developing online public services”. This is critical given Armenia’s low rate of internet penetration, as 56% of residents are daily users of the internet compared to 71 percent of EU residents (Freedom House, 2016 - Eurostat, 2016).

5.4. Joint Armenian-EU Research Following CEPA

One of the largest avenues of cooperation between Armenia and the EU related to the digital economy is joint research projects and cooperation in academia. Chapter 13, Article 78 of CEPA requests that both parties promote the “...civil scientific research, technological development and innovation on the basis of mutual benefit and subject to appropriate and effective protection of intellectual property rights”. Article 79 lists the specific policies related to scientific cooperation, such as “...the facilitation, within the framework of applicable legislation, of the free movement of research workers participating in the activities covered by this Agreement and the cross-border movement of goods intended for use in such activities” and the promotion of “...initiatives to increase research capacity and the participation of research entities from the Republic of Armenia in the research framework programme of the European Union”. Article 80 of the treaty elaborates on this cooperation, stating that “...synergies should be sought with activities funded by the International Science and Technology Centre (ISTC) and other activities carried out within the framework of financial cooperation between the European Union and the Republic of Armenia as stipulated in Chapter 1 of Title VII.”

Compared to the open-ended provisions laid out in the PCA, Chapter 13 of CEPA moves EU-Armenian research away from ad-hoc models of cooperation and focuses on incorporating Armenia into the wider European scientific community. Beyond commercial and private research, CEPA opens new possibilities for cooperative research among Armenian and European academia. Chapter 17, Article 94 of CEPA states that Armenian-European cooperation in areas related to education should be focused on “...promoting convergence and co-ordinated reforms in higher education in line with the European Union Agenda for Higher Education and the European Higher Education Area (Bologna
Process);” and “...developing the national qualifications framework to improve the transparency and recognition of qualifications and competences within the European Network of Information Centres and National Academic Recognition Information Centres (ENIC-NARIC) community aligned with the European Qualifications Framework”. The purpose of these clauses is to outline which standards should be met by Armenia in order to achieve academic reciprocity with European educational systems. As stated by the European Commission, the standards for higher education are critical for Armenia’s participation in initiatives like Horizon 2020 (European Council, 2017), and focusing on raising the standards of an already existing higher education framework would be more efficient than exploring new systems of accreditation.

6. Divergences in Eurasian and European Digital Integration

Differences regarding personal privacy and data collection, taxation rates for digital services, cryptocurrency regulation, and a variety of other elements of digital policy represent some of the largest barriers in digital trade. The approach taken by Belarus in legitimizing the production and trade of crypto-currencies while anchoring such activity to a specific economic zone differs greatly from the policies adopted by the EU - in which digital activities occurring anywhere in the geographic area of the EU is considered under the jurisdiction of the European Commission’s regulations on digital trade. Similarly, the taxation of income derived from crypto-currency trade differs greatly from the proposed DST proposed by the European Commission, in that one is derived from personal monetary gain while the other is calculated from the total value added to a product through digital processes. The categorization of digital industry as a service by the EU may also differ from a future designation by the EAEU. The possible divergence of digital integration efforts between the EU and the EAEU grows when we consider the possible creation of a competing privacy standard in the EAEU, analogous to the EU’s GDPR. While all members of the EAEU are so far aligned with GDPR standards on a bilateral basis, it is possible that a competing regulation may be introduced for usage within the EAEU – which may jeopardize the privacy integrity of data belonging to EU nationals that is stored in the EAEU.

Beyond diverging integration processes on a regional scale, it is possible that the digital environment of individual EAEU members may increase the disparity in standards between the Eurasian and European digital spaces. In addition to taking a consistently negligent stance towards large-scale piracy and organized cyber-crime (Sezneva, 2011), Russia has displayed a much more lenient stance towards the protection of personal data than the EU. Moscow has continued to conduct mass-surveillance programmes under an increasingly wide justification of "counter-terror activities”, i.e. the so-called Yarovaya package (Berg, 2016). While the EU has set strict guidelines on the collection, storage, and usage of personal data by a member state or EU authority, it seems that the Russian Federation has taken an ambiguous stance towards the gathering and processing of personal data.
7. Conclusion

The possibility of divergent digital integration between the EAEA and EU places Armenia in a rather peculiar spot. While not a formal associate of the EU, the ratification and eventual implementation of CEPA will harmonize many of the legal standards of both Armenia and the EU and ensure both greater access to and congruency with the European Digital Single Market. However, Armenia’s full membership in the EAEU takes precedence over this cooperation, and Armenia is expected to both comply with all standards set by the Eurasian Economic Commission as well as provide input and consultation towards the development of policies in the EAEU.

From a policy perspective, applying both the EU’s DST and a VAT in the form of the Belarusian model of crypto-currency regulation may prove to be cumbersome or legally incompatible. This would both increase the cost of electronic commerce and digital industry in Armenia as well as discourage investment from partners in the EU. The freedom of movement for digital services outlined in CEPA may also be compromised should the EAEU develop a regulation limiting movement of information. The introduction of security precautions for the decryption or collection of personal data circulating within the EAEU may compromise the privacy integrity of EU nationals and threaten GDPR compliance.

It is possible for Armenia to use its membership in the EAEU and compliance with CEPA as a proactive means of shaping more compatible digital policies between both unions. A bilateral agreement between the European Commission and Eurasian Economic Commission on the protection of privacy integrity with regards to data circulation in both digital markets would ensure that private data is adequately protected and Armenia remains in compliance with GDPR standards. This policy, acting as a sort of “GDPR-Plus”, may also be applied to data exchanges between the EU and other regional bodies (such as ASEAN) or to third parties like the United States. Similarly, the creation of a treaty on the harmonization of taxation in the EAEU and EU with regards to digital industry may be a fruitful area of cooperation between both commissions and may be included in a wider EAEU-EU bilateral trade deal.
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