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Legal Protection for Consumers in Transactions Through International E-Commerce Platforms Between Indonesia and China

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Abstract. *In addition to bringing advantages like easy access to foreign goods at competitive costs and altering global consumption patterns, the growth of cross-border e-commerce has also brought up complicated legal issues, especially with regard to consumer protection. In Indonesia, consumer protection regulations still focus more on domestic transactions, making them less effective for international transactions China, on the other hand, has a more comprehensive regulatory framework for controlling foreign e-commerce, however there are still issues with transparency and oversight in its execution. With a focus on popular platforms like Tokopedia, Bukalapak, AliExpress, and JD.com, this study contrasts the legislative frameworks for consumer protection in cross-border e-commerce transactions between Indonesia and China. The study's findings demonstrate that although Indonesia continues to struggle with interagency coordination and regulation execution, China leads the world in centralized oversight and consumer education programs. In order to establish a secure, equitable, and long-lasting e-commerce ecosystem, this study suggests that Indonesia take a more integrated strategy, bolster digital supervision, and enhance public education.*

Keywords: *E-Commerce Platforms; International E-Commerce; Law Enforcement; Legal Regulation; Protection of Consumers.*

1. Introduction

Cross-border e-commerce has grown rapidly in the modern era, altering global consumption patterns. This model of electronic commerce offers various benefits to consumers, including easy access to international products, more competitive prices, and a wider variety of choices. However, when transactions involve business entities or platform s operating overseas, complex legal challenges arise, particularly in the field of consumer protection. (Anita Firdausi & Rina Arum Prastyanti; 2025). The main issues that often arise include limited legal regulations regarding consumer rights in cross-border transactions, complicated processes for returning goods and refunding money, and suboptimal protection of personal data. (Supriyanto, S., Rahardjo, T. M. S., Sumiyati, S., Noerdjaja, H., Pambudi, G. E., & Prabowo, M. S; 2025). Despite the fact that Indonesia has a number of laws pertaining to consumer protection, these laws are less effective when it comes to protecting consumers in the context of international transactions because they are still primarily focused on domestic transactions. Meanwhile, China has a clear legal framework for regulating international e-commerce, although its implementation in practice still faces obstacles related to supervision and transparency. (Yuyut Prayuti; 2023).

The legal foundation for both domestic and international e-commerce transactions in Indonesia is established by a number of laws and regulations that govern consumer protection. These include Government Regulation No. 80 of 2019 concerning Trade Through Electronic Systems, the Electronic Information and Transactions Law No. 19 of 2016, the Consumer Protection Law No. 8 of 1999, and Minister of Trade Regulation No. 31 of 2023, which governs the use of electronic systems for trade by foreign companies in the Indonesian digital market. (Jasmine & Safrina; 2022). Although consumer protection aspects have been regulated, policy implementation remains weak due to a lack of coordination between relevant institutions, such as the Ministry of Communication and Information Technology (Kominfo), the Consumer Dispute Settlement Agency (BPSK), and the National Consumer Protection Agency (BPKN). This lack of integration between agencies has resulted in ineffective cross-border oversight, while dispute resolution has been difficult due to jurisdictional differences and the absence of clear legal mechanisms to address violations by foreign businesses. (ALAMSYAH, SAKTI, and FAUZIE YUSUF HASIBUAN; 2025). On the other hand, China implements integrated regulations that are strictly monitored by the State Administration for Market Regulation (SAMR) and the China Consumers Association (CCA), covering consumer rights, business obligations, and full implementation in cross-border digital transactions. Consumer awareness of their rights in China is also increasing, driven by strict law enforcement and effective complaint mechanisms on major platforms such as AliExpress. Despite the strengthening of regulations in China since the 2024-2025 revisions, online fraud remains a serious challenge, with data showing that consumer complaints from e-commerce transactions account for 56% of total market complaints, indicating significant financial losses. (Wang, Xi, and Chere' Cato Yturralde; 2024).

The comparison of these data illustrates the different challenges in consumer protection in both countries. China excels with its centralized monitoring system and massive consumer education, while Indonesia still faces obstacles in terms of institutional aspects and coordination between supervisory agencies. Therefore, in order to establish a secure, equitable, and long-lasting e-commerce ecosystem, Indonesia must take a more integrated strategy, bolster digital monitoring, and enhance public education. (Axel Imanuel Tania, Jennifer Almelia Lim, Suhan Chae, & Thalia Jamiana Kuang; 2024). This study also highlights major gaps in Indonesian consumer protection in international e-commerce, particularly in relation to coordination between institutions such as BPKN, BPSK, and Kominfo, which weakens the effectiveness of regulatory implementation, especially in handling disputes involving foreign businesses. Although regulations are in place, supervision and law enforcement still need to be improved to be more optimal. In comparison, China has successfully integrated a more centralized and effective monitoring system, utilizing digital surveillance technology to detect fraudulent practices more efficiently.

This study is unique in that it compares consumer protection in cross-border e-commerce between China and Indonesia, concentrating on popular e-commerce sites including JD.com, Bukalapak, Tokopedia, and AliExpress. This study also provides insights into how differences in regulations and implementation practices affect consumer protection in both countries. Consumer education is also a crucial factor in the success of protection, which has been carried out intensively in China but still needs to be improved in Indonesia. Thus, The findings of this study should aid in the creation of more efficient consumer protection policies while paving the way for the adoption of an integrated technology-based surveillance system in Indonesia. This study compares Indonesia's and China's legal frameworks for consumer protection in cross-border e-commerce transactions based on the aforementioned concerns, as well as the similarities and differences in consumer protection mechanisms on major platforms in Indonesia (Bukalapak and Tokopedia) and China (AliExpress and JD.com). This study aims to examine and contrast Indonesia's and China's legal frameworks for consumer protection in international e-commerce transactions, with a focus on comparing the main platforms in both countries, namely Tokopedia and Bukalapak in Indonesia and AliExpress and JD.com in China.

E-Commerce Use in China and Indonesia

In recent years, e-commerce has been increasingly popular throughout Asia, especially in China and Indonesia. Supported by increased internet penetration, lifestyle changes, and technological innovations, both countries have successfully built increasingly inclusive and competitive digital ecosystems. The existence of popular e-commerce platforms and the habit of online shopping via mobile devices are the main characteristics driving the growth of this industry. Differences in scale, technology adoption rates, and market strength have created unique characteristics that distinguish e-commerce usage in each country. (Risqi Fil'ilmi, Pio, and Daspar; 2025). The following diagram illustrates a comparison between e-commerce usage in Indonesia and China based on several key indicators, such as the number of users, transaction value, dominance of mobile usage, and popularity of e-commerce platforms.

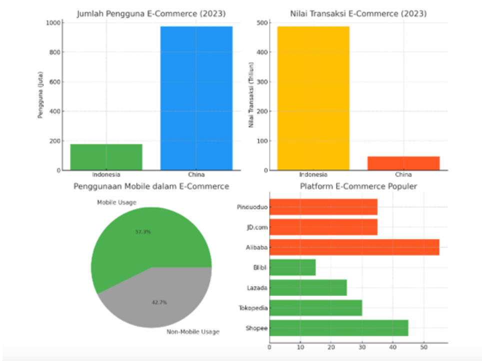

Figure 1 *Compares the rates of e-commerce use in China and Indonesia.*

The graphic illustrates a variety of crucial factors when comparing the use of e-commerce in China and Indonesia, including user numbers, transaction values, the predominance of mobile transactions, and the most popular platforms in each nation. Due to growing internet penetration and consumers' preference for mobile transactions, it is projected that there will be 178.9 million e-commerce customers in Indonesia by 2023. With over 974 million users and approximately 88% of all internet users purchasing online, China is the largest e-commerce market in the world. In Indonesia, e-commerce transactions are expected to be worth IDR 487 trillion by 2024, whilst in China, they are expected to be worth approximately 46,827.3 billion yuan, or US$6.8 trillion, in 2023. (K. Melati and S.P Nur Komala Dewi; 2020).

In terms of mobile device usage, Indonesia shows dominance with around 57.3% of e-commerce transactions coming from mobile devices, while in China more than 42.7% of retail transactions are made via mobile devices. Shopee, Tokopedia, Lazada, and Blibli are well-known e-commerce sites in Indonesia, whereas Alibaba, JD.com, and Pinduoduo dominate the Chinese market. This comparison confirms that the e-commerce market in China is already very large and mature, supported by strong digital infrastructure and an integrated ecosystem, while Indonesia is still in the growth stage with great potential for expansion, especially through mobile adoption and the strengthening of local platforms. (J. Zhu, Weidian Lan, and Xianchun Zhang; 2021).

Here are some examples of platforms from Indonesia and China:

1. Indonesian E-Commerce Platforms

a. Tokopedia

Figure 2. *Tokopedia*

Founded in 2009 by William Tanuwijaya and Leontinus Alpha Edison, Tokopedia is the biggest e-commerce site in Indonesia, with millions of merchants and over 100 million monthly active consumers. Tokopedia also provides various services ranging from marketplaces, digital payments, to logistics solutions, and has a significant impact on encouraging digital economic inclusion for small and medium-sized enterprises in Indonesia. Tokopedia must abide by laws that regulate transaction transparency, dispute resolution, and user data and privacy protection, such as the Consumer Protection Law, Government Regulations on Electronic Commerce, and the Personal Data Protection Law. Tokopedia continues to play a significant role in consumer protection and the national digital ecosystem despite difficulties in putting rules into place and upholding the law. (Devi Wulandari; 2025).

b. Bukalapak

Figure 3. *Bukalapak*

Achmad Zaky, Nugroho Herucahyono, and Fajrin Rasyid created Bukalapak, one of Indonesia's biggest e-commerce sites, in 2010. Initially, Bukalapak was created to empower MSMEs to market their products online. However, Bukalapak has now expanded to provide B2C, B2B, digital payment, logistics, and partnership services with traditional shops through the Mitra Bukalapak program, thereby expanding SME market access, increasing digital inclusion, and boosting local economic competitiveness. In 2021, Through an IPO, Bukalapak was formally listed on the Indonesia Stock Exchange, marking a significant turning point in the company's development. Regarding consumer protection, Bukalapak must abide by Government Regulation No. 80 of 2019, the Information and Electronic Transactions Law (UU ITE), and the Consumer Protection Law (UUPK), which regulate product information transparency, data security, and dispute resolution mechanisms. This ensures that consumers are entitled to clear information, transaction protection, and claims for any issues that arise, and that Bukalapak is responsible for maintaining the privacy and security of user data in compliance with relevant legal requirements. (Ananda Fadil Rassya Saputra, Aqila Judya Shafwa, and Rohmatul Umam; 2025).

2. Chinese E-Commerce Platform

a. AliExpress

Figure 4. *AliExpress*

Alibaba Group owns the international e-commerce site AliExpress that connects sellers, mainly from China, with consumers in various countries through competitive prices, diverse product choices, and flexible payment and delivery methods. The platform uses a "platform+fully-managed" and "semi-managed" business model that gives sellers a choice of control levels, as well as features such as AliExpress Live and real-time translation to support the international user experience. (Hao Peng and Mengyuan Xu; 2024). In terms of consumer protection, AliExpress must comply with regulations in various jurisdictions, such as the GDPR in the European Union, the FTC's rules in the US, and the UUPK and UU ITE in Indonesia. However, it still faces differences in trademark standards and supervision, so it needs to continue to strengthen its understanding and compliance with local regulations to minimize the risk of violations and maintain consumer trust. In terms of payment methods, AliExpress integrates Alipay with an escrow mechanism that protects money and speeds up the claims process by holding funds until the buyer certifies receipt of the items, and increasing the transparency and security of transactions. This mechanism has become common practice in Chinese e-commerce and has helped strengthen trust in platforms such as AliExpress. (J. Kwak, Yue Zhang, and Jiang Yu; 2018).

b. JD.com

Figure 5. *JD.com*

One of China's biggest e-commerce sites is JD.com (Jingdong), which started as a physical store in 1998, transformed into a B2C online business, and went public on NASDAQ in 2014. With the help of an effective internal logistics network that serves every part of China, the company sells a variety of goods, including fashion and electronics. In terms of legislation, JD.com must abide by international laws like the GDPR for cross-border transactions and China's Consumer Protection Law, which protects customers' rights to safe products and sufficient after-sales service, making transparency, consumer control over personal data, and accountability a priority. JD.com also has mechanisms for reporting and removing products that violate intellectual property rights, complies with international trade rules such as taxes and customs duties, and is considered low risk in terms of fraud thanks to its focus on product quality and logistics strength. To maintain its reputation and customer trust, the company continues to strengthen internal oversight and consumer protection so that complaints or disputes can be resolved quickly and accurately. (Hongbo Li, Zhenzhen Wang, Zhijie Yuan, and Xin Yan; 2023).

Comparison Of General Legal Protection

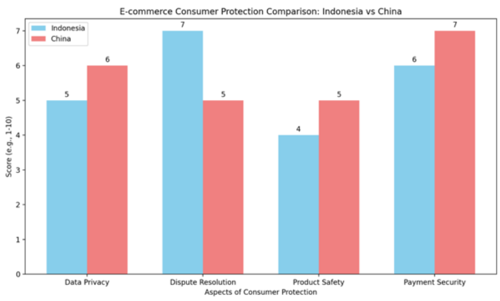

Figure 6. *Comparing Indonesian and Chinese e-commerce consumer protection*

The graph displays the consumer protection models for e-commerce in Indonesia and China. have fundamental differences in their approaches and implementation. China implements a centralized consumer protection system with strong administrative enforcement, in which supervisory authorities play a major role in actively monitoring e-commerce platforms and digital businesses. Regulations in China not only govern consumer protection in general, but also emphasize transaction security, product quality assurance, data management, and intellectual property rights protection. This comparison highlights the legal challenges in consumer protection frameworks for e-commerce across borders between Indonesia and China. The effectiveness of each nation's system in defending consumer rights in the setting of global digital transactions is the legal question at the heart of this examination, where jurisdictional complexities, varying enforcement practices, and technological developments present significant hurdles. China's legal framework for e-commerce consumer protection is highly centralized, with a strong emphasis on administrative enforcement. The primary authorities, such as the State Administration for Market Regulation (SAMR) and the China Consumers Association (CCA), play an active role in regulating e-commerce platforms. This centralized model aims to ensure businesses comply with laws related to transaction security, product quality, consumer data management, and intellectual property protection. With the passage of important laws like the E-Commerce Law and the Personal Information Protection Law, the legal framework is strong. These regulations provide a solid foundation for protecting consumer rights by ensuring transaction transparency, product safety, and the secure handling of personal data.

A key legal problem in China, however, is the challenge of balancing enforcement with transparency, especially in how consumer data is protected. Despite the strength of regulatory oversight, there remain concerns regarding data privacy and the transparency of enforcement processes. This gap exposes consumers to risks related to data breaches and fraudulent practices, which are not always addressed promptly. While China has made progress in strengthening its legal framework, the system still faces limitations in terms of consumer privacy protection, which requires constant adaptation to meet evolving technological challenges in cross-border e-commerce. The central legal issue here is whether China's regulatory model, despite its strengths in centralization and swift enforcement, can effectively address the rapidly changing nature of e-commerce, particularly in safeguarding consumer data. This issue is critical because the digital nature of cross-border transactions often means that consumers' personal information is at risk, and regulatory frameworks need to be agile and transparent enough to protect consumer rights on a global scale. In the event of a violation, authorities can immediately impose administrative sanctions on the platform without a lengthy legal process, resulting in a faster and more decisive response to problems. This regulatory model is considered more effective in practice, although it still faces challenges related to transparency and comprehensive personal data protection. (Anita Firdausi and R. A. Prastyanti; 2025).

In contrast, Indonesia is more notable for formalizing regulations and methods for resolving disputes. In Indonesia, consumer protection is governed by a number of laws, including the Electronic Information and Transactions Law, the Consumer Protection Law, and other related laws. However, implementation in the field still faces major challenges, particularly related to public digital literacy, weak law enforcement, and the lack of specific regulations that comprehensively regulate e-commerce and personal data protection. Dispute resolution mechanisms in Indonesia tend to be formal and time-consuming, so the effectiveness of consumer protection still needs to be improved. (D. Cahyaningsih, Dona Budi Kharisma, and Goldwina Aphroditerri Agnjana; 2024). In general, although the paths taken are different, In order to safeguard customers and enable them to conduct transactions in the digital age in a safe, comfortable, and secure manner, both China and Indonesia are working to modify laws in response to the quick growth of e-commerce.

2. Research Methods

In order to assess and compare the consumer protection regimes in cross-border e-commerce transactions between Indonesia and China, this study uses a comparative legal analysis technique. The methodology aims to address the primary research question of how each country's legal framework safeguards consumer rights, with a particular focus on cross-border transactions, where jurisdictional complexities and differing enforcement practices pose significant challenges.

A thorough analysis of the pertinent consumer protection regulations in China and Indonesia is the first step in the technique. These include the Electronic Information and Transactions Law (UU ITE), Indonesia's Consumer Protection Law (UUPK), and other relevant laws. The E-Commerce Law and the Personal Information Protection Law are the two main legislation analyzed for China. The study determines the regulatory reach, advantages, and disadvantages of consumer protection for international e-commerce transactions in both nations by examining these laws. Additionally, this research looks at the practical application of these laws through an in-depth review of consumer complaints, legal enforcement mechanisms, and dispute resolution practices in both countries. A key component of the study is examining how consumer rights, such as data protection, product quality assurance, and transaction security, are enforced in practice on popular e-commerce platforms like Tokopedia, Bukalapak, AliExpress, and JD.com.

To further assess the effectiveness of consumer protection, the study incorporates a qualitative analysis of case studies, reports from regulatory bodies, and complaints filed by consumers. This approach provides insight into the real-world challenges faced by consumers in cross-border transactions, particularly those involving international sellers and different legal jurisdictions.

Finally, the research synthesizes the findings to recommend improvements in Indonesia’s legal framework, focusing on increasing institutional coordination, enhancing digital literacy, and strengthening enforcement mechanisms. By comparing the experiences of Indonesia and China, the study aims to provide recommendations that could help create a more effective and consumer-friendly regulatory environment for cross-border e-commerce transactions. Through this methodology, the study aligns with the research objectives of identifying legal challenges in cross-border e-commerce consumer protection and offering policy recommendations that address these challenges. The analysis focuses on ensuring that consumers in both countries can transact safely and confidently in the digital marketplace.

3. Results and Discussion

3.1. Consumer Rights and Obligations in International E-Commerce Transactions

Cross-border e-commerce transactions between Indonesia and China open up great opportunities for consumers, but also pose challenges in terms of protecting rights and fulfilling obligations. In practice, the fulfillment of these rights and obligations is often hampered by differences in laws between countries, which make it difficult to enforce rights when disputes arise across jurisdictions. Low law enforcement and consumer literacy in Indonesia mean that many consumer rights are neglected, while personal data protection is a major challenge because protection mechanisms at the national and international levels are still weak in the context of cross-border transactions The rights, responsibilities, and difficulties faced by customers in international e-commerce transactions are briefly explained in the following table:

ASPECTS	CONSUMER RIGHTS	CONSUMER OBLIGATIONS	IMPLEMENTATION CHALLENGES
Information	Obtaining accurate, clear, and complete information about products, prices, and	Reading, understanding, and verifying the accuracy of information before	Limitations in the transparency and accuracy of information provided by

	the identity of business operators.	making a transaction.	business operators.
Security & Data	Receiving assurance of product safety and protection of personal data collected and processed in transactions.	Not misusing, sharing, or allowing the dissemination of data belonging to other parties without valid consent.	Data privacy protection mechanisms and cybersecurity measures that are still not optimal.
Choices & Transactions	having the autonomy to select goods, services, and e-commerce sites, as well as to carry out or refrain from carrying out transactions.	making payments in accordance with the electronic agreement's specified value, time, and method.	High risk of fraud, contractual fraud, and cross-border transaction disputes.
Compensation & Disputes	obtaining damages, compensation, and access to efficient dispute resolution procedures in the event of a loss.	Following complaint procedures and legal processes in good faith.	Complex, time-consuming cross-border dispute resolution processes that are often hampered by jurisdictional differences.

TABLE 1. *Rights, obligations, and challenges in implementing consumer protection in cross-border e-commerce transactions*

According to the table, customers who engage in international e-commerce transactions are entitled to accurate information, product and personal data security, freedom of choice and transaction, as well as compensation and access to dispute resolution, along with the obligation to read and understand information, use data in good faith, fulfill payments, and follow applicable legal procedures. However, the implementation of consumer protection is still hampered by low information transparency, suboptimal personal data protection mechanisms, high risks of fraud and Customers find it challenging to successfully enforce their rights due to cross-border issues and the intricacy of international dispute resolution procedures.

3.1.1. Key Challenges in International E-Commerce Transactions

International E-Commerce Transactions offer the convenience of shopping for goods from abroad, but behind this convenience lie a number of real challenges that are often experienced by consumers and businesses alike. One of the biggest obstacles is the difference in regulations in each country. (Yuyut Prayuti; 2023). The following graph illustrates the main challenges in International E-Commerce Transactions between Indonesia and China:

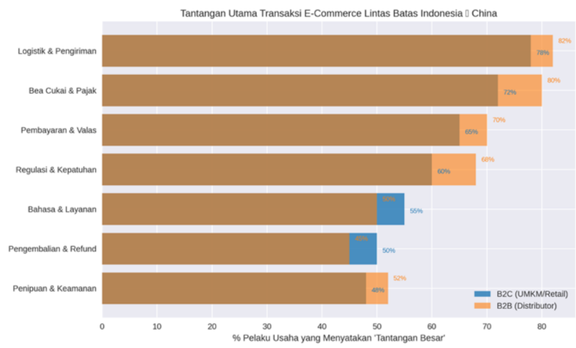

Figure 7. *Key challenges in International E-Commerce Transactions between Indonesia and China*

The graph demonstrates that Indonesian companies conducted both B2C and B2B cross-border e-commerce transactions with China, face different obstacles with varying degrees of pressure. B2C businesses are often disrupted, particularly by long delivery times, high logistics costs, and the risk of packages being held up or even lost, which reduces customer satisfaction, while B2B businesses feel the impact in increased inventory costs and delays in contract fulfillment. (Setiadi., Muharam, H; 2024).

Another major obstacle arises in customs and taxation, ranging from complicated procedures, HS code and customs value determination, to differences in regulations between Indonesia and China, which can cause significant financial losses and delays at ports for B2B players, while B2C often faces detained packages, unexpected additional costs, and consumer confusion when asked to pay levies outside of the application price. On the payment and foreign exchange side, B2C MSMEs still struggle with limited international payment options, high conversion fees, default risks, and potential card fraud, while B2B players are affected by exchange rate fluctuations and interbank transfer regulations that erode margins and disrupt cash flow, requiring more careful financial management.

In terms of regulation and compliance, businesses find it difficult to follow the ever-changing rules on e-commerce, product standards, consumer protection, and even tax and customs reporting, with B2B businesses bearing a heavier compliance burden than B2C businesses. Language barriers and differences in service standards also hinder communication with partners or customers in China, causing negotiations, after-sales service, and complaint handling to be slow, often leading to misunderstandings. (Florentya Syifa Hilwah Tamam, Triliunna Meiriska Sari Putria, & Rinandita Wikansari; 2024). Another challenge, albeit with a lower percentage, is costly cross-border returns and refunds, which take a long time and risk damaging goods, so many sellers are reluctant to offer flexible return policies, even though this is highly expected by foreign consumers. The risk of fraud and security issues, ranging from poor product quality, document forgery, to data theft, although not occurring in all transactions, can damage reputation, erode the trust of partners and consumers, and hinder long-term business development.

3.1.2. Implications of Regulations on Transaction Practices

This study examines the effects of Chinese and Indonesian regulations on business transaction practices, particularly in the e-commerce, fintech, and business competition sectors. The legal issue central to this analysis is how effective these regulations are in protecting consumers in cross-border transactions, especially in light of the different legal frameworks in both countries.

a. China's and Indonesia's e-commerce laws

Under the OSS framework, Indonesia has changed its transaction legislation by implementing a risk-based licensing system (Government Regulation No. 24 of 2018 and Government Regulation No. 5 of 2021). This aims to improve efficiency, transparency, and legal certainty, ensuring that business actors are registered on e-commerce platforms, and consumer protection is enforced through Minister of Trade Regulation No. 31 of 2023 and the Electronic Information and Transactions Law. However, the implementation remains weak, particularly concerning cross-border consumer protection. The need for regulatory updates to keep pace with technological advancements and new business models is evident.

Conversely, China has developed a more comprehensive regulatory approach, primarily through the Electronic Commerce Law, which addresses issues such as business registration, taxation, product authenticity, third-party platform liability, and cross-border services. The centralization of regulatory authority in China, enforced by agencies like the SAMR, ensures a stricter, more integrated system that better protects consumers in cross-border transactions. However, China faces challenges related to the supervision of informal actors and the transparency of enforcement processes, particularly in cross-border contexts.

b. Fintech Regulations in Indonesia and China

In the fintech sector, Indonesia has created a regulatory sandbox to test innovations while imposing limitations on foreign ownership in P2P lending services (capped at 85%). This regulation aims to foster financial inclusion and maintain stability in the national financial system. Yet, challenges persist in ensuring that these regulations adapt quickly enough to the rapidly changing fintech landscape, which could undermine the overall effectiveness of consumer protection.

China, on the other hand, has taken more stringent steps to regulate fintech, especially P2P lending platforms. The restructuring of these platforms into smaller entities and the enhanced regulatory oversight by authorities like the CSRC, supported by a strong antitrust regime, present a more proactive approach. This regulation is far more centralized and tightly controlled, enhancing the overall integrity of the fintech sector. However, the complex regulatory environment sometimes leads to challenges in enforcing these rules effectively, particularly in cross-border contexts.

c. Business Competition Regulations

Indonesia's business competition regulations, based on Law No. 5 of 1999, aim to prevent monopolies and unfair business practices. However, enforcement is still seen as insufficient, and the overall effectiveness of creating a competitive business environment remains underdeveloped. Strengthening enforcement mechanisms and ensuring that regulations are better aligned with global standards is necessary to enhance consumer protection.

In contrast, China's business competition laws are stricter, focusing not only on preventing monopolies but also on ensuring the protection of minority shareholders. The enforcement of these laws is more centralized, but the effectiveness of these regulations is also limited by challenges such as the lack of integration with global standards and the growing complexity of cross-border transactions.

d. Comparing Regulatory Approaches

While both countries place significant emphasis on business registration and transaction oversight, China's regulatory environment is notably more comprehensive and integrated. This centralization allows for faster enforcement and greater consumer protection. In comparison, Indonesia's regulations are less cohesive and more fragmented, which weakens the safeguarding of customers during international transactions. Thus, Indonesia needs to strengthen its regulatory implementation, update its regulations to accommodate technological advancements, and improve coordination between institutions to enhance consumer protection, making it more competitive in the global digital economy.

3.1.3. Online Shopping Platform

An e-commerce platform is a digital system that facilitates online buying and selling between sellers and buyers, which has now evolved into a complex technology-based ecosystem such as artificial intelligence, machine learning, and omnichannel integration. Features such as easy payment, fast delivery, and virtual interaction spaces make it an important part of modern life, while rapid growth in Indonesia and China is driven by internet penetration, smartphones, cashless payments, and aggressive promotions, such as Tokopedia, Shopee, Bukalapak, and Blibli leading in Indonesia, while Alibaba, JD.com, and Pinduoduo dominate in China.

E-commerce platforms also offer consumer protection, 24-hour customer service, instant digital payments, and the use of big data and AI to enhance the shopping experience. In China, e-commerce accounts for more than half of the country's retail trade, while in Indonesia, online shopping continues to rise, making the country the second-largest e-commerce market in Asia after China. Innovations such as live shopping and social commerce, including TikTok Shop, further cement e-commerce as a major trend in the digital economy, enabling consumers from all walks of life to shop conveniently and safely according to their preferences. (Mustafa Ayobami Raji, H. B. Olodo, Timothy Tolulope Oke, Wilhelmina Afua Addy, Onyeka Chrisanctus Ofodile, and A. Oyewole; 2024).

3.2. Weaknesses in the Enforcement System

China's and Indonesia's e-commerce consumer protection laws have different weaknesses influenced by regulatory frameworks, institutional capacity, and adaptation to digital developments.

ASPECTS	INDONESIA	CHINA
Regulation	Fragmented, not yet specific to e-commerce	E-commerce law exists, but ODR and data protection are not yet optimal
Law Enforcement	Weak, sanctions are ineffective, interagency coordination is weak	Strict supervision, but challenges of cross-border jurisdiction and informal actors
Dispute Resolution	Difficult, especially cross-border	ODR standards are not yet uniform, regional harmonization is lacking
Consumer literacy	Low, complaints are not optimal	Improved, but challenges remain for micro-businesses

TABLE 1. *Main Weaknesses of the E-Commerce Law Enforcement System between Indonesia and China*

Essentially, Indonesia faces major weaknesses in regulatory fragmentation, weak law enforcement, and low consumer literacy. Meanwhile, China is more advanced in terms of regulation, but still faces challenges in cross-border jurisdiction harmonization and Data security in online shopping. (Guan, Yue, and Dwi Febrianto; 2019).

3.2.1. Jurisdictional Challenges

International e-commerce exchanges between China and Indonesia do make it easier for businesses to buy and sell products to foreign markets. However, behind this convenience lie complex jurisdictional challenges, such as determining the competent court, which country's laws should be applied, and how to enforce judgments when the parties are located in two countries with different legal systems. Differences in legal systems (Indonesia adheres to civil law based on the European continental model, while China adheres to civil law with socialist characteristics), language differences, and the absence of a specific bilateral agreement on e-commerce disputes have resulted in low legal certainty and uncertainty, especially for MSMEs looking to expand across borders. To illustrate these various issues, a bar chart is used to score each type of jurisdictional challenge from the perspective of Indonesian actors and the regulatory context in China on a scale of 1-5. (Axel Imanuel Tania, Jennifer Almelia Lim, Suhan Chae, & Thalia Jamiana Kuang; 2024).

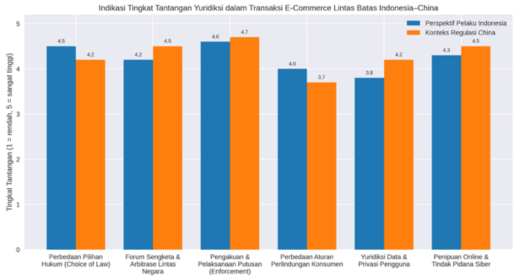

Figure 8. *Indication of the level of jurisdictional challenges in International E-Commerce Transactions between Indonesia and China*

The graph shows that the first challenge is the difference *in choice of law*, as contracts are generally subject to Chinese law. Indonesian businesses, especially MSMEs, often do not understand the legal consequences and continue to agree to them without a specific Indonesia-China agreement. Each party adheres to its national law, leading to increased conflict and high cross-border legal consultation costs (score of around 4.5). The second challenge concerns cross-border dispute forums and arbitration, as platform terms usually designate courts or arbitration institutions in China, meaning Indonesian businesses must bear the costs of translation, local lawyers, language and legal culture barriers, while cross-border ODR schemes are not yet mature (score of 4.2–4.5). The third challenge is the recognition and enforcement of judgments, because without a bilateral agreement, court or arbitration judgments may not necessarily be enforceable where the assets are located, even though both countries are parties to the 1958 New York Convention, so enforcement depends on national courts, public policy principles, and is often expensive, lengthy, and uncertain (score of 4.6–4.7). (Umar, Firmansyah, Fenty U. Puluhulawa, and Fence M. Wantu; 2023).

The fourth challenge relates to differences in consumer protection regimes, as Indonesia and China have their own rules on consumer rights, product standards, and platform responsibilities, which means that Indonesian consumers on Chinese platforms are subject to Chinese law, and Indonesian businesses selling to Chinese consumers do not yet understand their obligations , making returns, replacements, and compensation difficult (score of around 4.0 from the Indonesian side and 3.7 from the Chinese side). The fifth challenge is data jurisdiction and privacy, where China already has a strict framework such as the Data Security Law and PIPL, while Indonesia has only just begun to implement the PDP Law, so that server locations and cross-border data flows raise issues of authority, protection standards, and the burden of localization and data transfer (score of 3.8–4.2). The final challenge is online fraud and cross-border cybercrime, with a score of 4.3–4.5, because its handling requires lengthy and formal mutual legal assistance, differences in enforcement priorities between countries, and barriers to accessing and verifying electronic evidence spread across multiple jurisdictions, making law enforcement for cybercrime in cross-border e-commerce transactions highly complex.

3.2.2. Similarities and Differences in Consumer Protection Mechanisms in

Consumer protection mechanisms in Indonesia and China share similarities in their basic objectives and fundamental consumer rights, but have different law enforcement and supervisory agency structures. China and Indonesia both understand how crucial consumer safety is in online commerce, but it is very difficult to implement different mechanisms based on the characteristics of their legal systems.

Essentially, China has a more centralized, robust, and comprehensive e-commerce consumer protection system than Indonesia, particularly in terms of specific regulations, data protection, and law enforcement. However, both countries still face challenges in adapting regulations to digital dynamics and personal data protection. (D. Cahyaningsih, Dona Budi Kharisma, and Goldwina Aphroditerri Agnjana; 2024).

3.2.3. Comparison of International E-Commerce Transactions and Consumer Complaint Data

The percentage of international e-commerce transactions and customer complaints that Indonesia and China got in 2023 are contrasted in the following diagram. We can comprehend the correlation between the quantity of transactions and the quantity of complaints that occur in each nation by looking at these two pie charts.

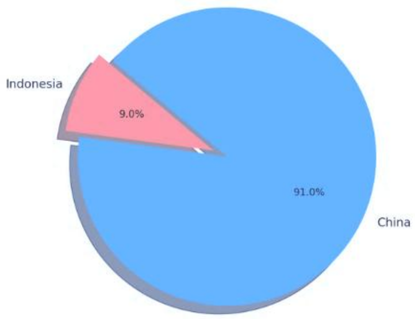

Figure 9. *Comparing Indonesian and Chinese international e-commerce transactions*

According to the data, roughly 91% of cross-border e-commerce transactions between China and Indonesia take place in China, while Indonesia only contributes about 9%. This confirms that the cross-border market in China is much larger, thereby significantly increasing the potential for disputes and consumer complaints. (Anita Firdausi and R. A. Prastyanti; 2025).

Meanwhile, the data showing the Comparison of Consumer Complaints Related to Cross-Border E-Commerce Transactions is as follows:

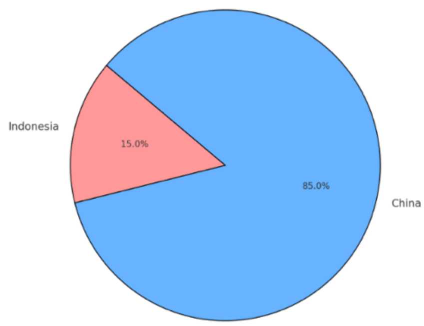

Figure 10. *Data on Comparison of Consumer Complaints between Indonesia and China*

The pie chart above shows that around 85% of consumer complaints originate from China, while 15% originate from Indonesia. In absolute terms, this is reasonable because the transaction volume in China is very large. However, when compared to the transaction share (9% vs. 91%), it appears that the share of complaints from Indonesia (15%) is greater than its transaction share (9%). This suggests that, proportionally, Indonesian consumers experience more problems or file more complaints than consumers in China.

This means that Indonesia's share of complaints is greater than its share of transactions, while China's share of complaints is smaller than its share of transactions. This shows that consumer protection and dispute resolution mechanisms in China are relatively more effective and consolidated through administrative enforcement and platform obligations, while Indonesia still faces challenges in ensuring a level of protection that is commensurate with the growth of international e-commerce transactions.

4. Conclusion

According to the study's findings, consumer protection in international e-commerce transactions between China and Indonesia still faces many structural weaknesses, even though a basic regulatory framework is already in place in both countries. In Indonesia, consumer protection is regulated through the UUPK, the ITE Law, PP No. 80 of 2019, and Permendag No. 31 of 2023, but its implementation has not been effective due to weak coordination between institutions such as BPKN, BPSK, and Kominfo, especially when dealing with foreign businesses on cross-border platforms. In contrast, China has a more centralized and strict supervision system through SAMR and CCA, with relatively consolidated e-commerce and consumer protection regulations supported by more effective complaint mechanisms, although cases of online fraud remain high. This comparison shows that the level of consumer protection in Indonesia in cross-border transactions is still more vulnerable than that of consumers in China, especially in terms of logistics, customs, return mechanisms, and personal data protection. Therefore, this study recommends that Indonesia strengthen institutional integration, improve cross-border digital supervision, clarify dispute resolution mechanisms with foreign businesses, and adopt best practices from the Chinese model without neglecting the national legal context, thereby creating a cross-border e-commerce ecosystem that is safer, fairer, and more consumer-friendly.

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