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PREPARING TO DEAL
WITH PERSONAL DATA
PROTECTION MEASURES
IN PLATFORM BUSINESSES

THE WAY FORWARD
FOR SUSTAINABLE
TOURISM IN THAILAND



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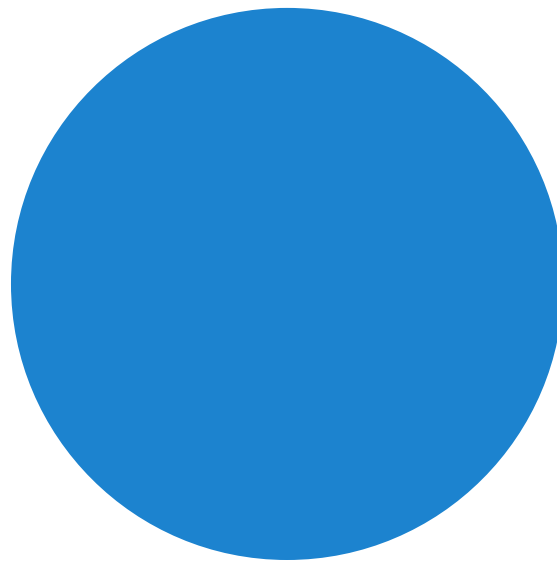
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PREPARING TO DEAL WITH PERSONAL DATA PROTECTION MEASURES IN PLATFORM BUSINESSES*

*Khemmapat Trisadikoon***

1. INTRODUCTION

The rapid growth of platform businesses in the past 10 years has created unprecedented wealth in human history due to the large-scale economic environment of many related companies, the use of artificial intelligence (AI) technology in business operations, and the use of big data to meet consumer demand. These factors have led to platform businesses growing economically more than traditional businesses. At the same time, this has created challenges different from those traditional businesses.

* Summary and additional information from Somkiat Tangkitvanich and others, *The Study on Impact and Regulatory Policy Proposal of Digital Platform in Thailand* (Office of the National Higher Education, Science, Research, and Innovation Policy Council, 2022).

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The personal data collected is significant to platform businesses as part of their use of big data. In business, the more business owners know about consumers, the better they can offer products and services that meet their needs. However, the desire for data to respond to consumer needs may lead businesses to overlook or not give sufficient attention to personal data protection measures. Traditional personal data protection measures may need to respond adequately to current platform regulations and oversight of personal data use.

This article explains the impact of using personal data in platform businesses and proposes guidelines for regulating and overseeing the use of personal data in platform businesses.

2. THE ECONOMY OF PLATFORM BUSINESSES AND THE USE OF PERSONAL DATA

In the past decade, global platform businesses have grown tremendously. In 2021, among the top 10 companies with the highest market value in the world, seven of them were digital platform companies,¹ which increased from just one in 2006.² In the context of Thailand, the market value of digital platform businesses has continuously grown from 18 billion baht in 2015 to 900 billion baht in 2021, with digital platforms playing a significant role in the e-commerce industry with a trade value

¹ Statista, *The 100 largest companies in the world by market capitalization in 2022* [online], accessed April 30, 2023, from www.statista.com/statistics/263264/top-companies-in-the-world-by-market-capitalization/.

² *The Economist*, *The rise of the superstars* [online], accessed April 30, 2023, from www.economist.com/special-report/2016/09/15/the-rise-of-the-superstars.

of approximately 600 billion baht, accounting for 8 percent of the total retail trade. The online advertising market is worth approximately 20 billion baht, accounting for 20 percent of the total advertising market. The value of food delivery through apps is approximately 50 billion baht, accounting for 8 percent of the entire food industry.³ As can be seen, the expansion of platform businesses has greatly benefited the economy, as mentioned above. On the other hand, it has also raised concerns about the potential impact of platform business practices, including using personal data.

At present, platform businesses have been collecting and using a large amount of users' personal data for profiling purposes in order to offer products and services that meet the needs of users. This is particularly true for businesses that offer free services, in which case users may provide their personal data in lieu of payment. In some cases, the service providers not only do not charge for the services, but also provide some benefits in exchange for users providing personal data to the platform or consenting to the use of their personal data for the platform's benefit.

Platform businesses have been collecting and using many users' data for profiling purposes to offer products and services that meet users' needs; this is particularly true for businesses that offer free services, in which case users may provide their

³ Prichart Chokkerd, *Food delivery in 2021 had a total value of over 50 billion baht, expanding over 24% year-over-year [online]*, accessed April 30, 2023, from <https://brandinside.asia/k-research-analysis-on-food-delivery-expand-in-2021/>; and Brandinside, *Restaurant businesses in 2022 face high risk and must be small-sized to reach customers and be highly flexible in order to have a chance to survive [online]*, accessed April 30, 2023, from <https://brandinside.asia/restaurant-business-2021/>.

data instead of payment. In some cases, the service providers not only do not charge for the services but also provide some benefits in exchange for users providing personal data to the platform or consenting to use their data for the platform's benefit.

The reason why consumers are not yet aware of the excessively low cost of privacy is due to information asymmetry between businesses and consumers. Consumers are not sure exactly what personal data the business is collecting and how the collected data will be used, including whether appropriate measures are in place to prevent leaks, resulting in an underestimation of the cost. In addition, companies may take advantage of consumer behavior biases that seek to avoid the difficulty of reading lengthy and complex documents or notifications, and may not adjust the default settings, fully allowing them to collect data.

In addition, the low-cost evaluation of personal data also includes not considering the impact of disclosing personal data on others (data externality), which can be both positive and negative.⁴ This means that information about a consumer's purchase of a product or service can indicate the possibility of another group of consumers purchasing similar products and services. However, the latter group of consumers may not provide information about their preferences for these products and services.

The key issue in protecting personal data on business platforms is balancing the use of data for business benefits and preserving the data subject's privacy.

⁴ D. Bergemann, Bonatti, A. and Gan, T. (2022), *The economics of social data. The RAND Journal of Economics*, 53: 263-296. Accessed from <https://ssrn.com/abstract=3459796>.

3. CHALLENGES IN PROTECTING PERSONAL DATA IN PLATFORM BUSINESSES

In Thailand, the challenge of protecting personal data in platform businesses lies outside the law, as Thailand has enacted the Personal Data Protection Act of 2019 based on such principles as the General Data Protection Regulation (GDPR) of the European Union. However, the challenge of protecting personal data in platform businesses lies in enforcing data protection laws. There are at least three challenges in protecting personal data in platform businesses, which are as follows:

3.1 Communication guidelines with consumers on the Internet

Communicating with consumers is essential in enforcing personal data protection. Generally, laws and guidelines for regulating the use of personal data require businesses that use personal data to communicate transparently and not burden consumers excessively. This involves providing information about collecting, using, and disclosing personal data and requires communication to be friendly toward consumers. The problem that arises is that some companies intend to disclose details about the use of data with language that is lengthy and difficult to understand, forcing consumers to spend a long time understanding it, or block some content on their websites to force consumers to give consent to the use of tracking technology, which is called a “cookie wall.”

In addition, this unfriendly communication may result in consumers not paying attention and granting businesses access to personal data without caution or consent, especially in the current era, where some platform applications have expanded to

become “super apps,” performing multiple activities on the same platform.

3.2 Appropriate measures to prevent data leakage

Appropriate measures to prevent data leakage are becoming more of a concern in Thailand. At the same time, it may be difficult for consumers to understand and evaluate the appropriateness of a company’s storage methods. This is partly due to the need for more standards for protecting personal data.

3.3 Non-compliance with cross-border personal data protection laws

Platforms often transmit data across borders, which may result in inadequate personal data protection due to lower data protection standards in some countries. The Japanese Internet company LINE Corporation has been investigated for providing consumer data to partner companies in China without notifying consumers as required by law. In addition, Chinese laws grant authorities, especially security agencies, extensive power, with lower levels of personal data protection than in Japan.⁵ Therefore, the problem of non-compliance with cross-border personal data protection laws needs to be addressed, and guidelines should be established for platforms transmitting data across borders.

The challenges in all three aspects are essential issues that need to be studied, with solutions put forward to address these problems.

⁵ *Nikkei Asia, Line silently exposed Japan user data to China affiliate [online], accessed April 30, 2023, from <https://asia.nikkei.com/Business/Companies/Line-silently-exposed-Japan-user-data-to-China-affiliate>.*



4. PERSONAL DATA PROTECTION UNDER THAI LAW

Thailand enacted the Personal Data Protection Act of 2019 as a general law for protecting personal data for various organizations, including platform businesses. The law is based on models such as the GDPR of the European Union, and its content is more than 70 percent similar to that regulation.⁶

The principle of this law is to create responsibility, transparency, and fairness toward the owners of personal data throughout the process of collecting and using data. It assigns duties to organizations that collect data (referred to as data controllers under the law), starting from clearly stating the purpose of collecting and using personal data, setting the principles of collecting personal data to the extent necessary and not exceeding the purpose that has been communicated to the data owners, ensuring the security of personal data, and deleting personal data when they are no longer necessary. Companies are responsible for monitoring and creating channels for data owners to exercise their rights under the law.

One more thing is that this law has defined the responsibilities of not creating excessive burdens for personal data owners in collecting and using personal data. That is, the law provides guidelines for collecting and using personal data legally, without requiring consent as the only method of collecting and using personal data, but the law acknowledges the use of personal data that is consistent with daily

life activities, such as collecting and using data from contracts,⁷ or collecting or using personal data by considering the balance between the rights of personal data owners and the benefits of the company (legitimate interest).⁸ These guidelines are accepted to be fair and not to create excessive burdens for personal data owners compared with collecting data by requesting consent, which may have negative consequences for personal data owners from collecting personal data without reason. This may also create opportunities for violating the rights of personal data owners in cases where the company may use broad and unclear language to request consent.

In addition, the law provides data subjects with certain rights to manage and control their data. These include the right to be informed about the collection, use, and disclosure of personal data, the right to access personal data to ensure its accuracy, and the right to withdraw consent or object to processing personal data. As the data controller, the company must comply with these rights, which can lead to the cessation of the collection, use, and disclosure of personal data.⁹

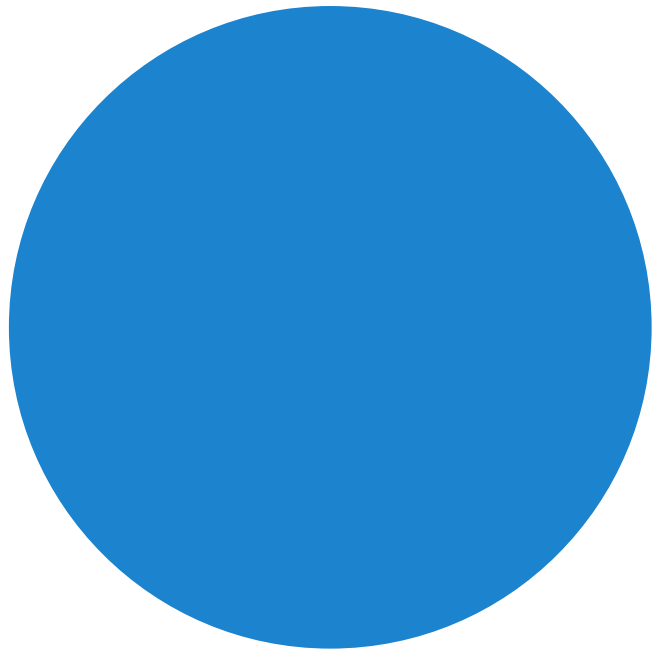
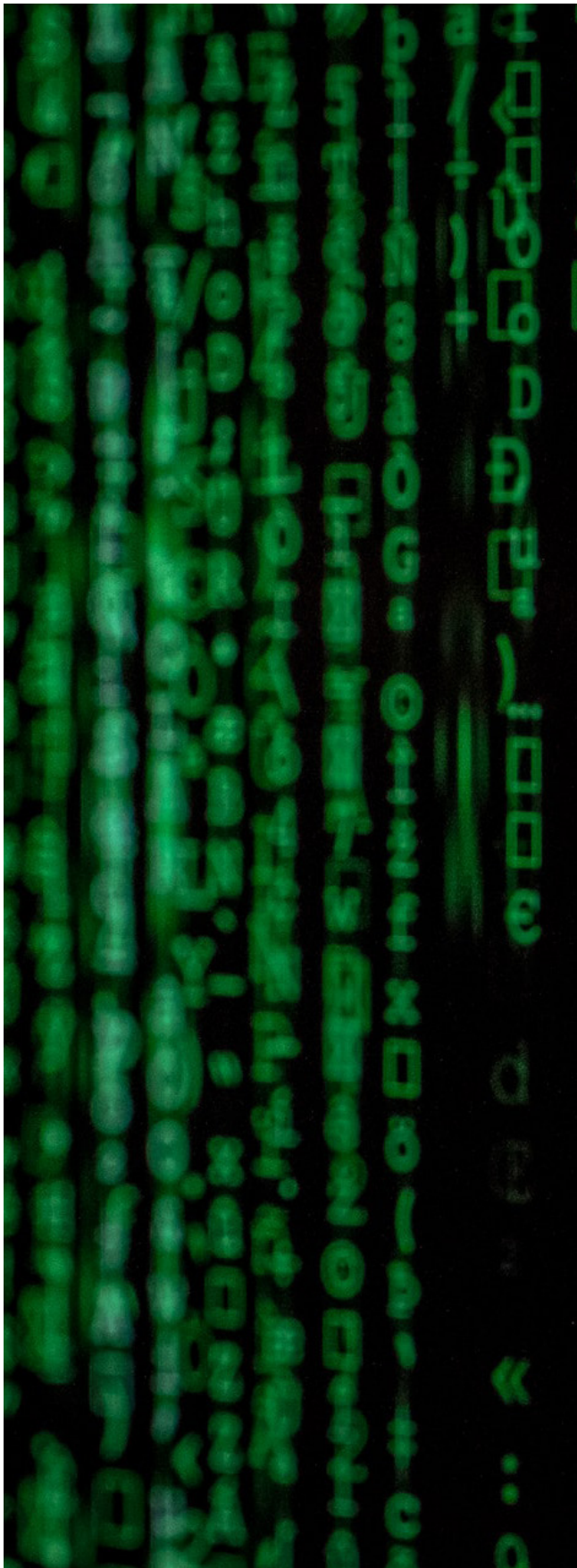
One important aspect that this law stipulates is expanding the scope of law enforcement to cover actions outside of the country or jurisdiction (extraterritoriality scope) to protect the movement of personal data to other countries and prevent loopholes in the protection of personal data. This can be achieved by requiring the destination country

⁶ Alexis Kateifides and others, *Comparing Privacy Laws: GDPR v. Thai Personal Data Protection Act [online]*, accessed April 30, 2023, from https://www.dataguidance.com/sites/default/files/gdpr_v_thailand_updated.pdf.

⁷ *Personal Data Protection Act of 2019, Section 24 (3)*.

⁸ *Ibid.*, Section 24 (5).

⁹ See *Personal Data Protection Act of 2019, Section 19, Section 23, Section 30, and Section 34*.



or company to have a standard of personal data protection equivalent to that under Thai law. In addition, the law also requires companies that use the personal data of Thai people but need offices in Thailand to appoint a representative to communicate with the supervisory agency. If these companies violate the law, they should be punished accordingly.

However, when examining Thailand's readiness to enforce the law, the law has only established criteria rules for data protection for just five issues, and there are only two guidelines related to data protection (see the table below). This is relatively minimal, raising concerns that the law may not adequately protect the right to privacy. One reason is that the Personal Data Protection Act of 2019 has only recently been enacted after a two-year delay in enforcing the law.¹⁰

¹⁰ The Act came into effect on June 1, 2022; see the Royal Decree specifying the agencies and businesses that are not subject to the Personal Data Protection Act of 2019 (Second Amendment) of 2021.

Table: Criteria rules and guidelines announced by the Personal Data Protection Commission (PDPC) (as of February 2023)

Regulations concerning PDPC Office and Commission	
1.	Regulations of the PDPC on the Criteria for Qualifications of Officers and Personnel Under the Personal Data Protection Act
2.	Regulations of the PDPC on the Specification of Identification Cards for Officers Under the Personal Data Protection Act
3.	Regulations of the PDPC on the Criteria and Procedures for Selecting the Chairman and Qualified Commission Members of the Conduct Commission for the PDPC Office
4.	Regulations of the PDPC on the Criteria and Procedures for Selecting the Chairman and Qualified Commission Members of the Supervisory Commission for the PDPC Office (Second Amendment)
5.	Regulations of the PDPC on the Criteria and Procedures for Selecting the Chairman and Qualified Commission Members of the Supervisory Commission for the PDPC Office
Regulations on Established Criteria Rules for Data Protection	
1.	Regulations of PDPC on the Exemption of the Record of Processing Activities for Small and Medium-sized Enterprise Data Controllers
2.	Regulations of the PDPC on the Criteria and Methods for Creating and Maintaining Records of Activities Related to the Processing of Personal Data by Data Processors
3.	Regulations of the PDPC on the Measures to Ensure the Security of Data Controllers
4.	Regulations of the PDPC on the Criteria for Considering the Administrative Fine of Expert Commission
5.	Regulations of the PDPC on the Submission, Non-acceptance, Termination of Consideration, and Time Limit for Considering Complaints
Guideline form PDPC	
1.	Guidelines for Obtaining Consent from Data Subjects Under the Personal Data Protection Act of 2019
2.	Guidelines for Notifying the Purposes and Details of Personal Data Collection from Data Subjects Under the Personal Data Protection Act of 2019

Source: Somkiat Tangkitvanich and others.

The problem arising from the lack of adequate data protection standards is that some private companies may take advantage of personal data without being accountable to the users, or some companies may need adequate data security systems. Meanwhile, individuals whose personal data has been violated may not be aware of the damage incurred immediately or may need more resources and expertise to conduct their investigation, leading to a lack of compensation for any damage suffered from the breach.

In addition, if we consider specifically platform businesses that collect and use personal data intensively, there are at least four urgent concerns as follows:

4.1 Transparent and ethical collection and use of personal data for consumers

There is a trend for platforms to collect an enormous amount of personal data. However, some businesses may have detailed and hard-to-understand privacy notices and block access to specific website content until the consumer agrees to use tracking technology (cookie wall). In addition, platforms are also trending toward expanding their business across different industries by sharing personal data among companies within the same group. For example, a food delivery platform may expand its business by providing loans using the drivers' income data as a database for loan services. This raises concerns about whether such data usage is beyond the stated purposes or without the consent of the individuals.¹¹

¹¹ See Somkiat Tangkitvanich and others, *The Study on Impact and Regulatory Policy Proposal of Digital Platform in Thailand* (Office of the National Higher Education, Science, Research, and Innovation Policy Council, 2022), pp. 76-80.

At present, although the Personal Data Protection Commission has guidelines for informing the purposes and details of collecting personal data from data subjects, as well as guidelines for obtaining consent from data subjects under this Act, the practices are focused on positive behaviors rather than negative ones to be avoided. For example, using personal data collection technology or tracking user behavior on websites and applications such as cookies does not emphasize the sharing of data among companies in the same group, which should have guidelines to promote transparency in the collection and use of personal data.

4.2 Security and prevention of personal data leakage

The platforms store a large amount of consumer data, but some may need appropriate measures to ensure security, leading to data breaches. Although there are currently guidelines for data security, these guidelines provide only a framework and factors to consider in maintaining data security. There are no recommended methods or technologies to ensure clarity for businesses.¹²

4.3 Cross-border transfer of personal data

The platform may transfer personal data to companies and countries that do not have the same level of personal data protection as Thailand.¹³

¹² See *Regulations of the PDPC on the Measures to Ensure the Security of Data Controllers*.

¹³ Other countries and areas, such as the European Union, have announced reliable "Whitelist" names. This clarifies which countries can send personal data through certified and supervised agencies.

4.4 Exemption from enforcing personal data protection laws in government agencies

On July 5, 2022, the Cabinet drafted a royal decree that would exempt the enforcement of the Personal Data Protection Act of 2019¹⁴ for government agencies using personal data. The royal decree would not apply to government agencies that collect and use personal data for national security or public interest purposes. However, this exemption could create many exceptions and potentially have adverse impacts on the privacy protection standards for Thai citizens, which differ from those of other countries. Transferring personal data from other countries to Thailand may challenge digital businesses.

The abovementioned issue reflects the problem of enforcing the Personal Data Protection Act of 2019 in Thailand, particularly in digital platform businesses. To bridge this gap, Thailand should study the principles of personal data protection and experiences from other countries. This guideline will help improve the regulation and supervision of personal data usage on digital platforms within the country.

5. GUIDELINES FOR THE PROTECTION OF PERSONAL DATA AND INTERNATIONAL EXPERIENCE

Under this topic, we shall consider approaches to protecting personal data in other countries, both in terms of legal principles and

¹⁴ Thai Government, *Summary of the news from the Cabinet Resolution on July 5, 2022* [online], accessed April 30, 2023, from www.thaigov.go.th/news/contents/details/56572?fbclid=IwAR3urkjQeTG60Xuu0gDYBT6rBmBityC30hJwHTtQncP8bEmGGPjCz30DdrA.

experiences related to protecting personal data in platform businesses in different countries.

5.1 Principle of data protection

The key objective of personal data protection is to balance consumers' right to privacy and the business benefits derived from using personal data, as well as national security. There are three regulatory models for personal data protection: the first emphasizes responsibility toward data subjects, the second allows companies to pursue business benefits freely, and the third prioritizes national security through state control.¹⁵

The first model emphasizes creating accountability toward the owner of personal data. An example of this type of law is the GDPR of the European Union and United Kingdom, which prioritize the privacy rights of data subjects. Businesses and government agencies that benefit from personal data are responsible for implementing appropriate measures to protect personal data and enable the owner of personal data to easily exercise their rights in managing personal data, including understanding the purposes of data collection and use, refusing to allow the use of personal data, requesting the transfer of personal data, or requesting the deletion of personal data.¹⁶

¹⁵ Martina Francesca Ferracane and Erik van der Marel, *Regulating Personal Data: Data Models and Digital Services Trade*, p. 6 [online], accessed April 30, 2023, from <https://openknowledge.worldbank.org/server/api/core/bitstreams/0b4562ce-777f-567b-8247-9441ec24a26c/content>.

¹⁶ Information Commissioner's Office (ICO), *How do we comply with the cookie rules?* [online], accessed April 30, 2023, from <https://ico.org.uk/for-organisations/guide-to-pecr/guidance-on-the-use-of-cookies-and-similar-technologies/how-do-we-comply-with-the-cookie-rules/>.

In addition, GDPR has also attempted to balance personal data use with the data subject's rights. The law may exempt certain rights of the data subject for collecting and using certain types of personal data. For example, data subjects may not be able to request deletion or refuse the use of personal data that is necessary for government tax agencies to comply with tax laws or for collecting personal data to prevent or control epidemics such as COVID-19, or for verifying financial data of suspected persons involved in terrorism or money laundering.¹⁷

However, these exemptions do not lead to the exemption of the overall protection of the rights of all state agencies. For instance, state agencies responsible for tracking and preventing the spread of COVID-19 still must prevent personal data from being leaked and cannot use such data for other purposes. They also must take other measures as specified in the GDPR.¹⁸

Another aspect is that GDPR allows private companies to collect and use personal data without explicit consent if it does not violate the data subject's privacy rights too much. For example, they collect cookies necessary for website performance.¹⁹

¹⁷ European Data Protection Supervisor (EDPS), *EDPS Survey on Covid-19 related processing activities by EUIs* [online], accessed April 30, 2023, from https://edps.europa.eu/system/files/2022-03/22-03-03_covid_survey_rreport_en.pdf; and *Data Protection Act 2018, Schedule 1*.

¹⁸ *Ibid.*

¹⁹ ICO, *What are the rules on cookies and similar technologies?* [online], accessed April 30, 2023, from <https://ico.org.uk/for-organisations/guide-to-pecr/guidance-on-the-use-of-cookies-and-similar-technologies/what-are-the-rules-on-cookies-and-similar-technologies/#rules9>.

The second model is the freedom of disclosure, allowing companies to seek business benefits freely. An example is the United States, where the federal and state governments have almost no laws protecting personal data that specify the company's responsibility and the data subject's rights. Companies can benefit from personal data without consent and use such data for purposes not notified to consumers in advance. Meanwhile, the data subject may claim damages for privacy violations citing consumer protection laws that do not specifically address data protection.²⁰ This situation may result in inadequate protection for the data subject. However, some states, such as California and Virginia, have begun to enact data protection laws like GDPR.²¹

The third model is the state's control of personal data activities, which prioritizes national security. An example is China, which enacted the Personal Information Protection Law (PIPL) in 2021 to protect personal data. However, the law grants authority to state officials to access private sector databases for reasons related to national security without complying with personal data protection

²⁰ *The data protection system in the United States is a "patchwork system" that lacks a central law but relies on multiple laws at both the federal and state levels, and is dispersed in laws that regulate branch-specific businesses.* See Khemmapat Trisadikoon, *A Study of the Necessity of and Approaches to the Preparation of Personal Data Protection Guidelines* [online], accessed April 30, 2023, from <https://tdri.or.th/wp-content/uploads/2022/07/Volume-37-Number-2-June-2022.pdf>.

²¹ See Office of the Attorney General, *California Consumer Privacy Act (CCPA)* [online], accessed April 30, 2023, from <https://oag.ca.gov/privacy/ccpa>; and Sarah Rippey, *Virginia passes the Consumer Data Protection Act* [online], accessed April 30, 2023, from <https://iapp.org/news/a/virginia-passes-the-consumer-data-protection-act/>.

measures.²² There have been observations about the behavior of the Chinese government accessing consumer data and various algorithms from platform companies such as Tencent, Alibaba, and ByteDance, which owns the TikTok application.²³

In addition, the Chinese government tends to tighten control over personal data in response to the activities of private companies that may affect the state's security. Previously, the Chinese government was concerned about registering Didi Global. This ride-hailing app collects screen image data from more than 12 million users, including the recording of facial images of more than 107 million users. By entering the United States stock market, the app would have to disclose information to the United States government, which would have impacts on the Chinese government's stability.²⁴

From all the above, the Thai companies' approach to balancing the use of personal data with privacy rights following the GDPR guidelines seems appropriate. Furthermore, in the context of the current global landscape, most platforms are trying to adapt to the GDPR's privacy protection standards of the European Union. The GDPR of the European Union has legally binding provisions

that extend beyond the European Union's borders to safeguard its citizens. To safeguard personal data, exporting it to countries or companies that have lower standards than the European Union is restricted unless consent or supportive measures are acquired. If data protection standards fall below those set by the GDPR, it will increase business costs.²⁵

5.2 International experience

Two foreign experiences are worth studying: the case studies of the European Union and the United Kingdom. These countries have implemented the GDPR, which is a principle-based regulation. It requires companies to have measures to ensure processing security without specifying any methods or techniques. Each private company can design privacy protection measures appropriate to its business, considering costs and available technology, which allows for flexibility in work while still protecting the privacy rights of personal data owners. At the same time, the law can adapt to changing situations and technologies.

The essential factors that lead to successful law enforcement are using "soft laws" and self-regulation mechanisms, such as developing guidelines and codes of conduct that provide principles, application guidelines, good examples, and behaviors to avoid that could violate the law. However, these tools do not have a legal status that requires strict adherence to their excellent examples, which allows companies to choose measures that

²² See Xu Ke and other, *Analyzing China's PIPL and how it compares to the EU's GDPR* [online], accessed April 30, 2023, from <https://iapp.org/news/a/analyzing-chinas-pipl-and-how-it-compares-to-the-eus-gdpr/>

²³ Annabelle Liang, *Chinese Internet giants hand algorithm data to government* [online], accessed April 30, 2023, from <https://www.bbc.com/news/business-62544950>.

²⁴ Eva Dou and Pei-Lin Wu, *China fines Didi \$1.2 billion for breaking data-security law* [online], accessed April 30, 2023, from <https://www.washingtonpost.com/world/2022/07/21/china-didi-fine-data-security/>. In addition, this measure has also been certified as a prohibition on companies collecting or using such data in Article 10 of the PIPL law.

²⁵ Marco Luisi, *GDPR as a Global Standards? Brussels' Instrument of Policy Diffusion* [online], accessed April 30, 2023, from <https://www.e-ir.info/2022/04/09/gdpr-as-a-global-standards-brussels-instrument-of-policy-diffusion/>.

comply with their principles and develop appropriate measures for their business characteristics.

The advantage of using these tools is that they create clarity in complying with the law and interpretation and serve as preliminary guidelines on how law enforcement agencies think. Ensuring transparency and fairness in collecting and using personal information is crucial, along with establishing standards for maintaining security and transferring data across borders. It is particularly essential for businesses operating on a platform.

The European Data Protection Board has issued 55 guidelines and is currently listening to feedback on another 11 guidelines.²⁶ Drafting these guidelines involves a consultation process and public hearing to receive input and suggestions for improvement from companies that may request further clarity or may have conflicting opinions.

An example practice of platform businesses is collecting data unfairly through a “cookie wall,” which is an obstacle that blocks access to website services created by companies. This obstacle disappears only when users consent to use cookie technology to collect and track their behaviors. To obtain consent for cookies, companies must avoid using a cookie wall as it is illegal. Instead, they can explore other ways to obtain consent following correct practices.²⁷

Data protection supervisory authorities also support the private sector in developing business ethics. This is done by allowing the private sector to develop their business ethics and having the supervisory authorities review and approve them.

²⁶ Data as of February 2022.

²⁷ Guidelines 05/2020 on consent under Regulation 2016/679.

An exciting example of business ethics is the EU Cloud Code of Conduct, which protects personal data on European cloud systems. Supervisory authorities in Belgium support this. Leading cloud service providers, including companies in the Alibaba Cloud and Google Cloud platforms, have signed up to comply with this code of conduct. These guidelines and standards ensure data security on the cloud and give clear direction on preventing data breaches for digital platform businesses that store data on their own cloud systems or third-party service providers.²⁸

Apart from using tools to comply with the law in the private sector, based on the experience of GDPR enforcement in the European Union, another critical issue is the role of regulatory agencies that need to work proactively. More than self-regulation alone is needed to protect personal data because companies have incentives to benefit from personal data, while the cost of accessing and verifying consumer data breaches is relatively high. Therefore, to help consumers, regulatory agencies must investigate and monitor business sector activities using personal data. For example, the Office of the Data Protection Commissioner of Ireland investigated cross-border data transfers of the TikTok app. This investigation was proactive without any complaints, but the committee assessed the risk of data transfer between countries because a Chinese company owns the app. The data were

²⁸ See *EU Cloud Code of Conduct, Alibaba Cloud adheres to the EU Cloud Code of Conduct* [online], accessed April 30, 2023, from <https://eucoc.cloud/en/detail/alibaba-cloud-adheres-to-the-eu-cloud-code-of-conduct>; and *Google, EU Cloud Code of Conduct* [online], accessed April 30, 2023, from <https://cloud.google.com/security/compliance/eu-cloud-code-of-conduct>.

sent to a country with weaker data protection laws, so the company may have to increase its efforts to protect it. In addition, the committee is concerned about the processing of personal data of children under 18 and the problem of verifying the age of individuals under age 13, which may not comply with GDPR.²⁹

Another example is the British Information Commissioner's Office (ICO), which has studied the impact of using AdTech on user privacy. For instance, collecting user data and behavior from various sources to create user profiles for personalized advertising may lead to inappropriate use of such data or presenting products or services that may harm consumers. The problem with this type of technology is that data collect from multiple sources, such as "third-party cookies," make it difficult to attribute responsibility to the data controller or processor.³⁰ As a result, ICO has consulted with the Interactive Advertising Bureau (IAB UK) and marketing platforms to improve the privacy-friendliness of AdTech.³¹

In addition, regulatory agencies should provide opportunities for businesses to consult and negotiate, such as in the case of ICO collaborating

with Google to develop a privacy sandbox on the Android system to develop targeted advertising techniques that are privacy friendly. The office provided legal advice and assistance.³² Developing under this regulatory sandbox mechanism would enable businesses to innovate while protecting consumer privacy at the same time.

6. SUGGESTIONS FOR LEGAL IMPROVEMENTS

In protecting personal data in platform businesses, the government and the Personal Data Protection Office should maintain a balance between protecting the privacy rights of consumers and the business benefits and national security. This should be based on international standards to facilitate data transfer across borders and appropriate practices should be implemented. The government and the Personal Data Protection Office should take the following actions:

(1) Enforce the law according to the principles of the Personal Data Protection Act of 2019, maintaining a balance between the privacy rights of consumers and the business benefits and national security, like the GDPR of the European Union, which will be the global standard in the future.

(2) Repeal the exemption of personal data protection law for government agencies that would adversely affect the privacy rights of the public and platform businesses in the country.

²⁹ Data Protection Commission, *Irish DPC submits Article 60 draft decision on inquiry into TikTok* [online], accessed April 30, 2023, from <https://www.dataprotection.ie/en/news-media/irish-dpc-submits-article-60-draft-decision-inquiry-tiktok-0>.

³⁰ ICO, *Update Report into Adtech and Real Time Bidding* [online], accessed April 30, 2023, from <https://ico.org.uk/media/about-the-ico/documents/2615156/adtech-real-time-bidding-report-201906-dl191220.pdf>.

³¹ IAB UK, *IAB UK's response to ICO's adtech and real time bidding: Update Report* [online], accessed April 30, 2023, from <https://www.iabuk.com/news-article/iab-uks-response-icos-adtech-and-real-time-bidding-update-report>.

³² ICO, *ICO's Opinion on Data Protection and Privacy Expectations for Online Advertising Proposals* [online], accessed April 30, 2023, from <https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2022/02/ico-statement-on-the-google-privacy-sandbox/>.

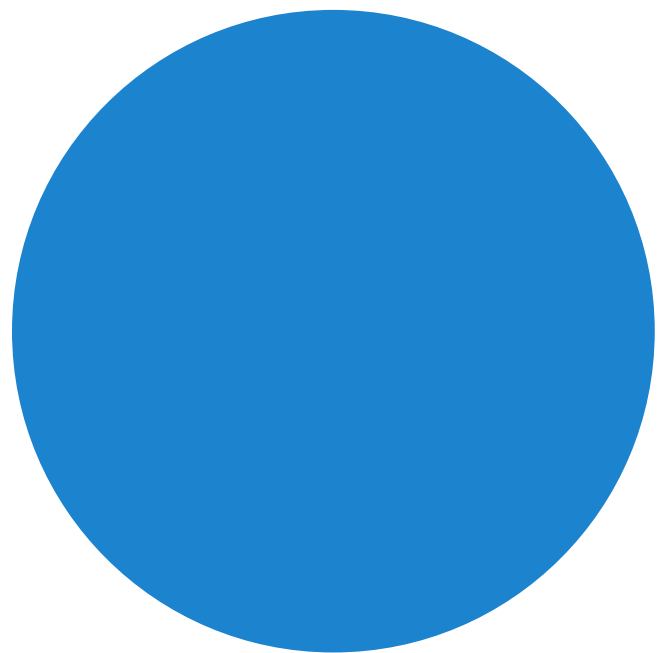
(3) Accelerate the promotion of self-regulation of good platform businesses by issuing guidelines and encouraging the development of business ethics, particularly urgent issues, such as:

- Accelerating the development of practices regarding the proper notification of privacy and consent for the use of data storage technology, monitoring user behavior on websites and applications, as well as the practice of using data in addition to the first purpose that reports for platforms that expand cross-sector operations by sharing data between companies within the group, which the Office of the Personal Data Protection Committee may clarify by preparing examples of different situations where consent or behavior should or should not be required consent.
- Supporting the development of security and prevention ethics for preventing data leaks for large platforms, or maybe certified by international ethics for data protection on cloud systems in the European Union.
- Developing practices for evolving company policies and protective measures when sending data to countries with lower protection standards than Thailand.

(4) Conduct aggressive monitoring of the operations of platforms that may pose high risks to consumer privacy, such as checking platforms that are expanding into “super apps” to see if they share data among companies within the conglomerate

correctly and examining platforms that may transfer data to destination countries with lower protection standards than Thailand. The office may conduct aggressive inspections by using algorithms that the platform businesses use.

(5) Open opportunities for platform business companies to receive consultation from the Office of the Personal Data Protection Commission for discussion between platform business companies using the “regulatory sandbox” supervision method to allow platform business companies to innovate while considering the privacy rights of data subjects.







THE WAY FORWARD FOR SUSTAINABLE TOURISM IN THAILAND

Patree Witoonchart and Adis Israngkura*

The COVID-19 pandemic, while a devastating crisis that brought tourism across the globe to a grinding halt, may offer a rare opportunity: to steer and reinvent Thai tourism in a better, more sustainable direction. This pivot is long overdue. Despite being a major driver of economic welfare and providing livelihoods for millions, tourism has been plagued with a multitude of problems long before the pandemic. In the context of COVID-19 and a warming and changing climate, integrating environmental, social, and economic sustainability is more important now than ever before. As part of the “Study to Develop a Framework on Sustainable Tourism Development in ASEAN in the Post-COVID-19 Era,” TDRI contributed policy recommendations from a Thai perspective which were integrated into the overall regional outlook. Our study reviewed the following: the state of the

Thai tourism industry; existing and novel challenges posed by the pandemic; and associated policies governing the sector. It also offered ways forward to realize the potential of tourism as a vehicle for sustainable development and growth.

PRE-PANDEMIC CHALLENGES IN THE TOURISM SECTOR

Even before the COVID-19 pandemic, Thailand already faced several significant issues regarding tourism, such as overcrowding, tourism destination imbalance, money leakage, tourist safety, disruption of local life, and structural problems relating to policy. These problems still exist today in various forms.

Tourism in Thailand is unevenly dispersed, with pronounced concentrations of tourists in specific provinces. This clustering behavior is especially obvious in terms of foreign tourists, where 86 percent of them visited only the top 10 provinces.¹ With domestic tourists, such factors as driving distance and crowdedness mean that the market is a little more dispersed, but 48 percent of destinations were still in the top 10 provinces.² For the popular destinations, overcrowding has led to environmental degradation, pollution, changes in the local culture, and deterioration of the tourist experience. High tourist traffic can also increase land prices and the cost of living, leading to gentrification and displacement of locals, as well as resources being devoted to tourists rather than locals. On the other hand, when tourism is not evenly distributed,

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¹ Ministry of Tourism and Transport (https://www.mots.go.th/more_news_new.php?cid=411).

² *Ibid.*

the lesser-known provinces do not benefit from the jobs, infrastructure, and investments granted by the government, businesses, and tourists.

Another issue affecting Thailand's competitiveness is safety and security. Thailand has historically experienced several crises that negatively affected tourists' perception of the country, or even led to other countries issuing safety warnings recommending against visiting. For example, 2010 was marked by deadly political protests, and in 2014 the Royal Armed Forces staged a military coup d'état following months of political unrest. In 2018, a Chinese tourist ship capsized, resulting in the death of 47 people, which led to significant declines in Chinese tourism in the ensuing months. Between 2016 and 2019, 2,522 tourists were injured or killed in Thailand, with just over half of such incidents related to land transportation and 20 percent due to water-related, non-transportation causes, such as marine activities. Over-priced taxi and tuk-tuk rides in Thailand are among the leading complaints made by international tourists. The World Economic Forum ranked Thailand very poorly in the "Safety and Security" section of the 2019 Travel and Tourism Competitiveness Report; Thailand ranked 111th, which is especially jarring when compared to its regional neighbors, such as Malaysia (34th) and Vietnam (58th).

At the same time, host communities may also have negative perceptions of tourists and tourism development, which they view as negatively affecting their quality of life. Concerns include overconsumption of natural resources, low quality of clean water supply, poor wastewater management, littering, overcrowding, and over-modification of coastal land characteristics.

Furthermore, issues exist with the creation and implementation of Thailand's National Tourism Development Plans (NTDP), the guiding document for the tourism sector. The first of these concern the vision and implementation of those Plans. NTDP authors (a private firm), approvers (National Tourism Policy Committee), and implementers (various ministries), are all different parties, a situation which may lead to a disconnect and the Plans not being fully realized. A second concern is that, while local governments are key to driving sustainable tourism, many lack the necessary expertise and resources, especially as this concept is quite new. Third, different ministries are responsible for various aspects of the tourism agenda. This means the NTDP do not fall directly under their responsibilities and they are not accountable for the Plans' success, so the plans are often not prioritized. Furthermore, the Ministry of Tourism and Sports has quite limited power over all the interconnected facilities and systems that make up tourism, mainly regulating tour groups and tour guides, while other aspects, such as hotels, air and road travel, and beaches are under other ministries. Lastly, most key performance indicators are activity-based rather than outcome-based, making it unclear whether, or to what extent, these activities contribute to the overall goal of sustainable tourism.

Thailand's tourism growth has slowed over the last few years for various reasons, partly because of the problems outlined above. Over-crowding has degraded the local environment and culture. Political instability and recent events have directly contributed to the decline in tourism, from the 2014 overthrow of the government by the military to the conflict in the South to

anti-government protests. Significant leakage reduces the amount of money that stays in the country and many local communities feel that their lives suffer negative impacts as a result of tourism. While Thailand has a strong policy framework regarding tourism development, the process of realizing its goals leaves room for improvement. With the COVID-19 pandemic, businesses and communities were devastated by the loss of income, and the country suffered the loss of one of its main economic engines. In going forward, it is even more important to restart this engine while addressing existing issues. Sustainable tourism is therefore important to Thailand because of the need for the country to remain attractive as a tourism destination, while ensuring that local resources are preserved and that all stakeholders benefit.

TOURISM IN THAILAND AND THE COVID-19 PANDEMIC

Thailand attracts one of the highest numbers of foreign tourists in the world, ranking 7th in 2019 with 40 million international visitors. In comparison with the rest of the ASEAN countries, Thailand captured by far the highest number of international tourists, over 50 percent more than Malaysia which is in second place. The Tourism Authority of Thailand has traditionally relied on a “mass tourism” strategy, which is designed to attract the highest possible number of visitors to maximize profit and growth. This is reflected in the 10.3 percent growth rate in the number of international visitors to Thailand between 2008 and 2017, well above the global average of 4.1 percent in the same period.³

³ *Ibid.*

Thailand is highly dependent on international tourists, which in total spend approximately twice the amount of money that domestic tourists spend despite being far outnumbered by Thai tourists. This has led to many industries being specifically tailored to foreign tourists, so they suffered much more when the COVID-19 pandemic closed international borders. Overall, the Thai GDP declined by 6.3 percent while the tourism GDP declined by 60.8 percent.⁴

In response to the COVID-19 pandemic, the Thai government now intends to stimulate tourism through the “Rao Tiew Duay Kan” or “We Travel Together” scheme, which subsidizes accommodation, travel, and dining costs. According to an analysis by Mae Fah Luang University, the program was a success in several ways. There was a high level of interest from tourists. Since the start of the program in 2020, each renewal of the scheme was highly successful; all the hotel room subsidies were claimed during each phase and stimulated billions of baht in domestic spending. Second, travelers were pleased by the variety of attractive accommodations and destinations, and businesses said the program aided their sales and revenue. Third, the surveyed travelers spent slightly more on an average trip in 2020 than they did in 2017, suggesting that the program gave them more spending power. However, the analysis also found shortcomings with the program. Both travelers and businesses had issues with the conditions for signing up for the program and found the associated online applications difficult to use and they experienced frequent disruptions. Furthermore, many Thais found

⁴ *Ibid.*



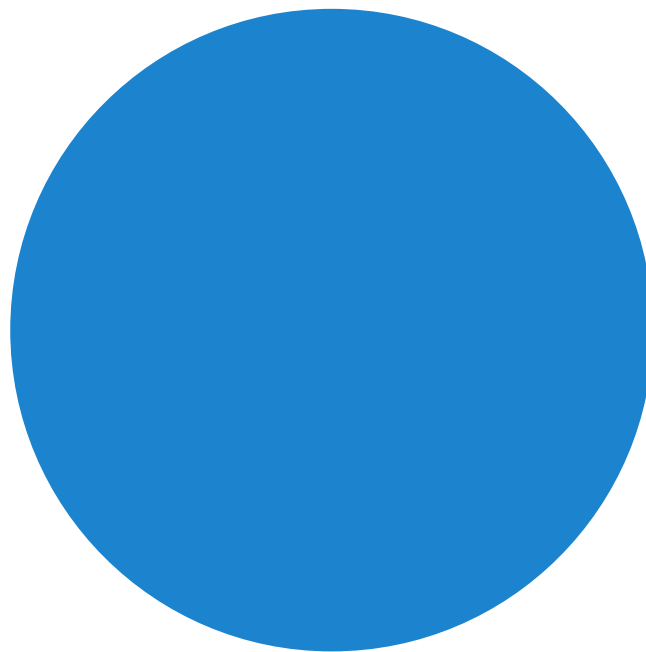
the program inaccessible due to the lack of digital access and being unfamiliar with the cashless banking system, raising questions about inequality.

According to the World Tourism Organization (2019) and the Bank of Thailand's analysis, post-pandemic global tourism trends are shifting in several different ways. There will be a move toward smaller groups and free independent travelers as opposed to mass tourism characterized by tourists in large groups and those who purchase pre-defined travel packages. Following the broad global trend, more attention will be paid to responsible, green, and community-based tourism, learning about local cultures and experiences, as well as medical, wellness, and sports tourism. In terms of technology and digital infrastructure, tourists will be expecting more contactless payment, accessible tourism platforms, online queues, and generally less contact during travel. The "sharing economy" will also become more important as people increasingly use

mobile applications to access new types of sharing services, such as rideshares. For locations and types of travel, people may prefer shorter trips closer to home, increasingly staying domestically or regionally. They will shift toward lesser known, more niche destinations that are of premium quality and safety rather than crowded mainstream attractions. There may be more focus on media and experience-sharing on such online platforms as Instagram. Thailand has capitalized on many of these trends, such as the dramatic shift to online services and advertising on social media. The increasing interest in cultural tourism is also reflected in several national-level plans such as the Bio-Circular-Green (BCG) Economy and the National Tourism Development Plan. Keeping up with these trends will be a key component of recovering from the adverse effects of the COVID-19 pandemic as well as building mechanisms that will keep Thailand's tourism attractive and relevant in a changing world.

PROGRESS OF SUSTAINABLE TOURISM DEVELOPMENT IN THAILAND

The idea of sustainable tourism has been present in Thailand for at least 20 years and recent major policies consistently emphasize the idea. This includes the 20-year National Strategy Plan (2017-2036) and its tourism sub-plan, the National Tourism Development Plans, and the BCG Strategic Plan and its associated BCG In Action: Tourism and Creative Economy plan. These plans recognize and attempt to address the longstanding issues outlined in the introduction as well as capitalize on the projected post-pandemic global trends. One of the outcomes in the 20-year Tourism Strategy Master Plan is to increase tourism income in secondary cities by small percentages every year, addressing the current issue of heavy tourist clustering in major cities. While the safety and security of tourists are not explicitly addressed, general safety is the full-time responsibility of many ministries, such as the Department of Disaster Prevention and Mitigation. All of these plans address, to some degree, improving the lives of locals living in tourist destinations and giving them the means and resources to capitalize on tourism opportunities. A lot of these plans, especially the BCG and the 20-year Tourism Strategy Master Plan, address the projected post-pandemic global trend, specifically diversifying tourism offerings and targeting high-spending, more environmentally conscious smaller groups of travelers. They are aimed at expanding the number of medical and wellness tourists and capitalizing on the value of “Thainess,” shifting focus away from the mass sun-and-sea tourists to whom previous strategies have catered.



Another measure taken by the government to promote sustainable tourism was to conduct in 2017 a study on the Tourism Satellite Accounts and the System of Environmental-Economic Accounting (TSA-SEEA). The study served as a launching point for developing a national tourism account that includes environmental costs, fostering cooperation among agencies for tourism-related information on natural resources and assessing the “green GDP” by considering environmental losses in economic growth. The four accounts considered are water, energy, greenhouse gas emissions, and solid waste. The study found that environmental costs accounted for 18 percent of total tourism GDP, but acknowledged that more accounts needed to be included to get a more accurate picture, namely asset accounts for land, soil resources, timber resources, aquatic resources, other biological resources, and water resources.



In addition, the idea of sustainable tourism has been applied by many organizations, such as the Andaman Community-Based Tourism Network, and the Sustainable Phuket Tourism Project. Most of these tourism projects are supported by or work in collaboration with national tourism organizations, namely the Designated Areas for Sustainable Tourism Administration (DASTA), the Tourism Authority of Thailand (TAT), and the Ministry of Tourism and Sports (MoTS). DASTA acts as the central agency in coordinating network partners for sustainable tourism development, while MoTS is responsible for the promotion, support and development of competitiveness policies to generate income for the country, and TAT is primarily responsible for marketing, both domestically and internationally.

In recent years, the Thai public has started to embrace the concept and importance of sustainable tourism. According to a 2021 survey by Booking.com, which polled 29,000 travelers, including 968 Thai people, about their attitudes and behaviors, the COVID-19 pandemic may have inspired more environmentally conscious attitudes. Of the Thai respondents, 78 percent said that the pandemic has made them want to travel more sustainably in the future; 98 percent said they want to stay in a sustainable accommodation in the upcoming year, and 91 percent want to reduce general waste while on trips. Overall, more than 80 percent of the Thai respondents said that preserving cultural heritage is crucial, that they are willing to avoid popular tourist destinations to help disperse the benefits and avoid overcrowding, and that they want the economic impacts of tourism to be shared equally at all levels of society.

CONCLUSIONS AND RECOMMENDATIONS

Tourism is a key driver of the Thai economy, but the sector has faced many problems even before the COVID-19 pandemic. As a result, sustainability is being increasingly included in plans and policies. The 20-year National Strategy plan and other key tourism development plans integrate sustainability in their visions both from the demand and supply sides. However, many of these policies do not take advantage of regional-level opportunities and still face unresolved challenges from entrenched issues. Therefore, our recommendations for enhancing sustainable tourism in Thailand are as follows:

1. Stimulate domestic tourism

Despite far outweighing the foreign market in terms of number of trips and number of travelers, the domestic tourism market in Thailand has been largely overlooked. Stimulating domestic tourism would increase resilience to such external shocks as the pandemic and lessen dependency on international markets. While the Thai government has already issued several travel incentives, such as the “We Travel Together” package which offers food and accommodation discounts, further steps must be taken to improve the infrastructure and the appeal of secondary tourism sites to sustain long-term domestic demand. Examples of such actions include Phuket reviving a walking guide to the old town of Phuket, offering resources and capacity-building to communities to host community-based tourism, encouraging gastronomic tourism and unique foods in specific provinces, and improving travel accessibility to lesser-known destinations.

Domestic tourism can differ from international tourism both in terms of destinations,

food types and services; for example, while such destinations as Pattaya Beach attract international tourists, the nearby Bang San Beach is preferred mostly by local Thai visitors. Stimulating domestic tourism will help not only increase income for the indigenous vendors but also increase diversity and resilience in the Thai tourism industry. Public policies and measures to stimulate domestic tourism will need to focus on well-planned space allocation and zoning, parking areas as well as sanitation and public safety. **More importantly, there is a need for a paradigm shift among the government authorities to recognize the importance of local, cultural, and indigenous tourism businesses. This includes, for instance, Thailand's valuable social capital, such as street food, street art, and busking. Such tourism attractions should be protected rather than penalized.**

2. Increasing participation in tourism

Currently, the tourism sector is overly driven by the private sector centered around Bangkok. Increasing participation of local communities and governments in designing tourism that works for their specific location and needs will ensure more sustainable, equitable models in the future. Involvement of local communities in tourism has been considered a crucial factor in sustainable tourism as it provides opportunities to gear tourism in the direction that is in line with community development, local culture, and values. Involvement of local communities also distributes tourism income to the local people, thus fostering long-term community development.

The role of government, central and local, needs to be focused on tourism infrastructure that encourages local community involvement in

sustainable tourism, namely public space for local vendors, cultural conservation, and cultural exhibitions, capacity-building as well as access to tourism information. **Emphasizing local community involvement in tourism will also help diversify tourism activities which are the backbone of tourism sustainability.**

3. Adopting a more region-conscious approach

Regional connectivity offers vast potential for expanding tourism within ASEAN countries. Owing to the proximity among the ASEAN members, extending tourism privileges, such as single-entry visas to international tourists, would enhance tourism opportunities for the tourists to visit more than one country on a single trip within Southeast Asia. Permission for cross-border travel by either private or rental vehicles could be made be more lenient. Adopting a more region-conscious approach would also involve provision of tourism facilities, investments, and business opportunities across the region in such areas as accommodation, travel, and insurance.

ASEAN citizens also form a critical bloc of tourists within the region, as evinced by Malaysian nationals who comprised the second largest group of tourists to Thailand in 2019, behind Chinese nationals. Policies such as the 2002 visa exemption agreement for ASEAN citizens for short-term travel to other member states are valuable tools for strengthening such intraregional travel, and policies granting similar privileges and incentives should be explored. This should be noted as one of the targets in the ASEAN Tourism Strategic Plan 2016-2025, under Strategy 1.7, is to “enhance travel facilitation.”

A region-conscious approach toward ASEAN tourism will further expand the diversity of tourism destinations that will not only attract more tourists, but also provide stability, which is a key for sustainable tourism. Most Thai national policies currently do not have a regional focus nor do they consider how to utilize regional advantages. It would be useful to integrate these ideas into subsequent tourism action plans. Promotion of a region-conscious approach to tourism requires realignment of several laws and regulations including those related to immigration and customs. These issues can be further discussed among ASEAN member countries.

4. Increase key performance indicators related to sustainability and environmental outcomes

The main outcome indicators specified in Thailand's tourism plans are mostly economic criteria, such as the proportion of tourism GDP to national GDP and standings in various tourism index rankings. Considering sustainability includes both social and environmental outcomes, there should be more explicit objectives and outcome measurements dedicated to these two aspects. The following are indices that may be helpful:

- **Travel & Tourism Competitiveness Index (TTCI) by the World Economic Forum**

In 2019, the TTCI ranked Thailand 31st out of 140 countries overall. Thailand performed strongly in the natural resources department, scoring 4.8 out of 7 and ranking 10th in the world; however, the country scored 3.6 out of 7 for environmental sustainability, ranking 130th. Performance was particularly poor in the indices for PM2.5 concentrations



(131st), stringency of environmental regulations (104th), and threatened species (111th). While this key performance indicator is already included in many plans, greater emphasis could be placed on Thailand's environmental sustainability ranking.

- **Proportion of businesses with environmental certifications and standards**

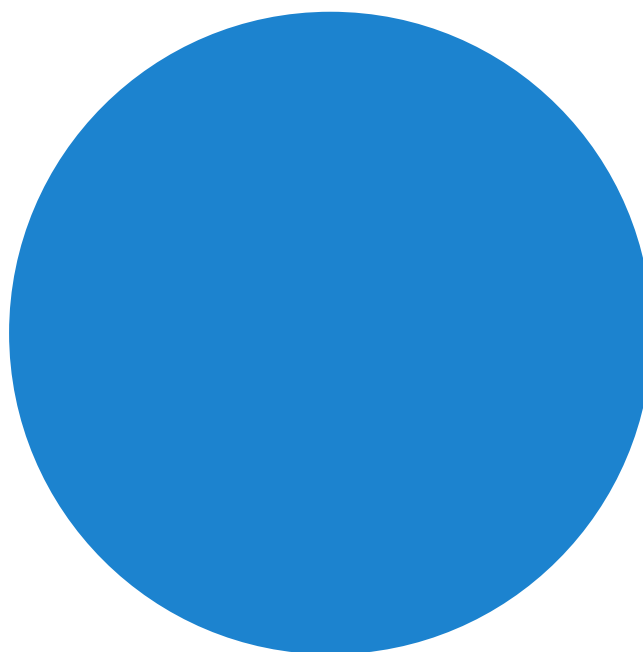
Thailand has several environmental certifications related to tourism, such as the Green Leaf Environmental Certification of Hotel Operational Standards, Green National Parks, and Q Organic. Measuring the growth of applications for these certifications, as well as the number of foundations issuing these certifications, can be a good key performance indicator for popularity and effectiveness sustainability movement.

- **Green GDP as calculated by TSA-SEEA**

Green GDP is a GDP metric that considers the environmental costs involved in generating economic growth. In 2017 when the study was conducted, tourism GDP was valued at almost 1.08 trillion baht, while the green GDP was valued at almost 887 billion baht. Higher green GDPs compared to the raw GDP may indicate lower levels of environmental degradation and biodiversity loss within the economy. [Green GDP will also take into consideration tourism destination sites that have visitation rates exceeding their carrying capacities.](#)

5. Increased cooperation between ministries and relevant agencies to achieve sustainable tourism goals

While it is crucial to have perspectives from various ministries in creating and guiding Thailand's tourism plans, implementation is often scattered, unprioritized, and incoherent. Tourism planning largely involves work co-ordination among several agencies, such as those responsible for public security, public transportation, accommodation, food and beverages, and insurance. The agencies responsible for tourism-related services often have their own plans and agendas to which they need to adhere; therefore, implementing tourism policies and plans is carried out through collaboration and consultation among the agencies concerned. It is recommended that the Thai government may consider assigning sustainable tourism indicators to agencies involved in the provision of tourism services. This will help increase the importance of sustainable tourism and strengthen cooperation between ministries and relevant agencies in promoting sustainable tourism.



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