CRA CORN REFINERS ASSOCIATION

Trade Update

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Highlights

- **USMCA**: The Trump Administration's ambitions for a June 1st USMCA entry into force date are fading as all three countries are likely to miss the deadline this Wednesday, April 1st for an exchange of letters certifying necessary regulatory and legal changes are in place. The next possible entry into force date for USMCA would be July 1st.
- **U.S. – U.K. Trade**: Trade talks with U.K. and the EU are delayed as each country pivots its attention and resources to fighting the spreading COVID-19 virus. Travel restrictions, shelter in place policies, and self-imposed quarantine of multiple trade or government officials in the U.K. and EU who tested positive for the virus have complicated expectations for timely trade negotiations.
- **China Trade**: USDA and USTR have lauded several recent steps by China to fulfill agriculture commitments under the phase one trade deal, including approving U.S exporters of beef, pork, and grains, and announcing several large agriculture purchases. Despite calls from lawmakers and U.S. industry groups, President Trump has firmly rejected the possibility of lifting or suspending tariffs on over $300 billion of Chinese imports.
- **U.S. – Kenya**: USTR's notification to Congress and request for public comment on negotiating objectives meet two necessary procedural steps for trade talks to commence with Kenya as earlier as June 15th. In conjunction with its request for public comments, USTR is scheduled to conduct a public hearing on the negotiations, but both dates were announced prior to President Trump's recent announcement the U.S. will continue to practice social distancing through end of April.
- **WTO**: A group of 16 WTO member countries, including the EU and China, have agreed to an alternative appeals system as an interim solution to the non-functioning Appellate Body (AB) in Geneva. The group emphasized the agreement is a temporary solution and the group remains committed to a reformed functioning AB system.

USMCA

- Top Mexican and Canadian officials confirmed they are expediting efforts to prepare for implementing the new USMCA provisions. Mexican Economy Minister Graciela Márquez Colín indicated officials from all three countries are discussing implementation issues by phone aiming for June 1st entry into force. Márquez Colín said, "We are advancing -- advancing very, very quickly to have all of the procedures ready for entry into force." Márquez Colín, Amb. Lighthizer and Canadian Deputy Prime Minister Chrystia Freeland participated in the discussion according to reports. The three officials reportedly discussed progress on internal legislation and customs procedures.
- The latest reports suggest the White House's ambition for a June 1st USMCA entry into force may be in jeopardy. According to sources, the three trading partners will likely miss a key deadline this week. This Wednesday (April 1st), all three countries are slated to exchange letters certifying each nation has met all the necessary obligations and regulatory changes under the provisions of USMCA. The USMCA spells out the entry into force timeline as "on the first day of the third month of the last notification," or in this case June 1st should the letters be exchanged as planned. If the letters are not exchanged by Wed. the 1st, the next possible entry date would role to July 1st. Several groups and lawmakers have repeatedly expressed concerns with the ambitious June 1st timeline, particularly the auto sector, which is grappling with complex rules of origin changes in the USMCA and several U.S. automakers have shifted attention and resources to making ventilators to alleviate the chronic shortage in fighting the COVID-19 pandemic.
- Several USMCA stakeholders including the auto industry, are concerned with a June 1st entry date for USMCA. The auto industry issued a statement saying, "We are in the midst of a global pandemic that is significantly disrupting our supply chains, and the industry is throwing all available resources into managing production through this crisis for our employees and for the broader U.S. economy." The statement continued, "Even if it were reasonable to divert our attention to USMCA compliance, the United States, Canada and Mexico have yet to issue, even in draft form, the uniform automotive rules of origin regulations. Without them, many questions remain unanswered regarding how to interpret the new rules."
- Senators Grassley and Wyden - expressed caution with a June 1st USMCA implementation date. Senator Grassley said, "I think the administration would be wise to reconsider and show some flexibility for the sake of our economy," regarding the USMCA timeline. Senator Wyden said that USMCA should enter into force only "when facts indicate that our trading partners are complying with the obligations in the agreement, not an arbitrary date determined by political motive." "It would be a mistake to enter an agreement into force prematurely because doing so jeopardizes the benefits of the agreement that are hard fought wins intended to benefit American workers, farmers, ranchers, and innovators," Wyden said.
- Canadian Prime Minister Justin Trudeau named former Canadian USMCA negotiator, Kirsten Hillman, as ambassador to the United States. Ms. Hillman has been serving as acting ambassador since August 2019 and was deputy ambassador for two years before that. Trudeau lauded Hillman's "critical roles" in USMCA and the CPTPP negotiations. Trudeau stated, "When we worked together to negotiate the new NAFTA, I saw Ms. Hillman's ability to stand up for Canadians and fight for their interests." Before joining the embassy in 2017, Hillman was assistant deputy minister of the Trade Agreements and Negotiations Branch of Global Affairs Canada.

Acting Canadian Amb. to U.S., Kirsten Hillman

Section 232 Tariff Actions

- The public debate continues over possible suspension of U.S. section 301 and 232 tariffs. Last week White House trade adviser, Peter Navarro, denied the Trump administration is contemplating pausing or delaying tariffs to stimulate the U.S. economy. Michael Stumo, head of the Coalition for a Prosperous America defended the present tariff policy stating, "A lot of those duties are in place because those imports were found to be subsidized or otherwise unfairly traded and injuring American companies." "We don't want to reduce or delay them because they would reinjure companies that are increasingly injured now," he said.
- In contrast several economists and academics argue the tariffs are a net negative for the U.S. economy. Dan North, senior economist for North America at Euler Hermes said, "Tariffs cause more losers than winners." "That is probably costing something like in terms of GDP, 0.3% to 0.5%, so it is a significant drag, especially in this environment," he said. Mary Lovely, an economics professor at Syracuse University, said, "The tariffs cost firms $900 per worker per year, so you can think of it as an easy way to put $900 per worker back in the companies that are employing those workers." Lovely noted that if China reciprocated it would particularly help U.S. farmers who agriculture exports presently face significant Chinese retaliatory tariffs.
- As reported earlier President Trump has rejected calls to date for inclusion of tariff relief in the arsenal of economic policy tools to lessen the fallout from COVID-19. President Trump rejected a tariff request letter by American for Free Trade, comprising over 160 firms, stating in White House briefing that there was "no reason" to include tariff relief in an economic stimulus package. Trump continued, "I can't imagine Americans asking for that."
- The American Institute for International Steel (AIIS) is petitioning the Supreme Court again to consider its challenge to the Section 232 statute. Previously, the U.S. Court of Appeals for the Federal Circuit rejected the argument, agreeing with the previous ruling by the Court of International Trade (CIT). In March 2019, the CIT determined that a 1970s-era case, in which Algonquin SNG Inc. unsuccessfully challenged the imposition of license fee programs on imports of petroleum goods, served as binding precedent. The Supreme Court declined to hear the case last June before it was considered by the Court of Appeals. AIIS asserts that time is of the essence now that "both lower courts" have responded, according to its petition.

Auto Tariffs

- No significant updates since eight Senators joined to file an amicus brief in the ongoing lawsuit calling for Commerce to the release the 232 autos report. Senator Toomey charged that Commerce is "willfully violating federal law" by refusing to comply with a provision in the recent Congressional spending bill that requires public release of the report. Toomey added that "Commerce has left Congress few options but to support legal action compelling the release of this report." The amicus brief was led by senators Pat Toomey, Chuck Grassley, and Ron Wyden. The other five signatories were Senators Bill Cassidy, Ron Johnson, Mike Lee, Ben Sasse, and Mark Warner.

Pat Toomey, U.S. Senator

- Earlier in the year, the Department of Commerce announced it would not release the Section 232 auto report that concluded autos and auto parts imports pose a threat to national security. Commerce released the following statement, "Consistent with the president's signing statement for the appropriations bill, the Secretary of Commerce is not releasing the 232 autos report because releasing it now would interfere with the president's ability to protect confidential executive branch communications and could interfere with ongoing negotiations," a department spokesperson said in a statement. The decision was in part based on a Justice Department opinion that said releasing the report would " risk impairing ongoing diplomatic efforts to address a national-security threat."

Section 301 Tariff Actions

Tech and IP Policies – China

- President Trump remains steadfast against removing tariffs, firmly rejecting the notion of tariff relief multiple times last week as a revitalization tool for sinking U.S. economic activity and trade flows. Speaking at a daily White House briefing on COVID-19, unsolicited, President said tariff relief was not an option, contending the tariffs on China, along with 232 tariffs on steel and aluminum have been good for the U.S. economy. He emphasized the tariffs on China provide critical negotiating leverage as the U.S. and China look towards phase two negotiations, though he commented China may be holding out until after November in hopes of a different U.S. President.
- Later in the week Trump rejected a Wall Street Journal report that the administration might stop collecting duties for three months to ameliorate the severe economic pressures on companies due to COVID-19. At a White House briefing last Friday, Trump said the report was "just more fake news." "Everybody keeps saying, are you going to suspend the tariffs?' Trump said. "Well, the answer is no."
- A group of Senate Finance Committee Republicans, led by Senate Finance Chairman, Chuck Grassley, are urging President Trump to expand tariff exemptions, place a moratorium on further tariff increases, and other trade measures to mitigate the economic downfall being caused by the COVID-19 pandemic. In the letter, the Republican senators proposed several options, including:
  - coordinating with other countries to prevent the proliferation of harmful export restrictions;
  - pausing consideration of reported Buy American requirements for health, safety and medical devices;
  - Section 301 tariff relief on health, safety and medical devices and products;
  - temporary deferrals of duty collection to boost liquidity for businesses;
  - expansions of Section 301 tariff relief and extensions of exclusions already granted; and
  - consideration of a total moratorium on new or increased tariffs.
  - Joining Senator Grassley on the letter were Senators Mike Crapo, Pat Roberts, Mike Enzi, John Cornyn, John Thune, Pat Toomey, Tim Scott, Bill Cassidy, James Lankford, Todd Young, and Ben Sasse.
- Some Democrats are also calling for increased tariff exemptions and tariff relief. According to reports, Reps. Ron Kind, Suzan DelBene, and Terri Sewell last week urged the Trump administration to speed up the processing of tariff exclusion requests and temporarily suspend certain tariffs to help companies deal with the economic fallout of the coronavirus.
- In contrast, several industry trade associations are less supportive of potential tariff relief. Five steel industry associations expressed concern about a recent Customs and Border Protection notification that importers may be granted additional days for payment of estimated duties, taxes and other fees, as a result of the COVID-19 pandemic. In a letter to Acting CBP Commissioner Mark Morgan the group said the CPB action could "encourage bad actors" to take advantage. "Any efforts to delay or reduce the collection of duties on unfairly-traded steel imports or imports that threaten to impair US national and economic security will ultimately hurt US workers and businesses during this unprecedented moment," the letter stated.
- Alliance for American Manufacturing President Scott Paul sent a letter to Mr. Morgan urging him to resist calls to defer or avoid duty payments on imports from China. "Allowing imports to come in without the present payment of duties gives them a price advantage," he wrote. But the American Association of Exporters and Importers sent President Trump a letter outlining a 7-point plan to provide immediate relief for U.S. companies, including delaying implementation of the USMCA, extending payments of customs duties, relaxing export controls and import restrictions for essential products and extending exclusions on Section 232 and Section 301 tariffs. The Coalition of American Metal Manufacturers and Users called on President Trump to end the Section 232 tariffs on imported steel and aluminum immediately – at least for 90 days – if not permanently.
- The Congressional Research Service released a legal analysis (i.e. Legal Sidebar) of trade-related measures government officials could undertake to enhance access to medical goods in response to the COVID-19 pandemic. Principle measures on medical goods cited included, introducing exports restrictions, reducing or eliminating tariffs, revising import procedures, and prioritizing domestic production. In reference to tariffs, the document noted, "Congress could potentially remove or eliminate tariffs, as it possesses constitutional authority to "lay and collect . . . Duties" (i.e., tariffs)," in addition to the President's authority to "authorize the Secretary of the Treasury to permit . . . the importation free of duty of food, clothing, and medical, surgical, and other supplies for use in emergency relief work" under Section 318 of the Tariff Act of 1930."

Seasonal Produce

- As reported earlier, USTR's seasonal produce field hearings scheduled for April are postponed due to COVID-19 issues. The original March 26 deadline for interested parties to submit comments and information ahead of the hearings was also waived. The docket on Regulations.gov for submissions will remain open during the period of postponement. USTR plans to announce new submission deadlines and rescheduled hearing dates in the future.
- Earlier Mexican government officials warned the country may be forced to react should the U.S. imposes restrictions on seasonal produce trade. Mexican Undersecretary for North America Jesús Seade said Mexico would use USMCA's dispute settlement mechanism as well as unilateral measures "to start." He emphasized that Mexico would "probably take action of a similar commercial magnitude on appropriate sectors, it could be agricultural sectors." Seade affirmed that "if anything is inconsistent with our commitments, we will have to respond."
- As reported earlier, in a Jan. 9, 2019 letter to the Florida delegation Amb. Lighthizer outlined the administration's plan to review and determine options regarding "trade-distorting policies that may be contributing to unfair pricing in the U.S. market for seasonal and perishable products and to assess the impact of those policies on U.S. producers." The letter notes that within 60 days after "entry-into-force" of the USMCA, the USTR will "implement effective and timely remedies necessary to address any trade distorting policies" affecting U.S. growers. Additionally, within 90 days, the Department of Commerce, U.S. Department of Agriculture and USTR will have hearings in Florida and Georgia to hear testimony from growers. According to USTR, "At the hearings, officials from the federal agencies will hear from interested persons on how the Trump Administration can support these producers and redress any unfair harm."

U.S. - Japan Trade Agreement

- No significant updates on phase one U.S. Japan trade pact. Prior to the outbreak of COVID-19, commencement of negotiations on a phase 2 or a comprehensive trade deal were expected no earlier than May according to several sources.

U.S.-EU Trade Agreement

- Bilateral communications between the U.S. and EU have shifted to working to address the global health crisis. The U.S. Chamber of Commerce and the American Chamber of Commerce to the EU have called on both governments to resist temptation to impose new trade restrictions amid the coronavirus outbreak, arguing that the crisis is an opportunity to reinvigorate the trans-Atlantic relationship. However, Trump expressed deep frustration with the present trading relationship, particularly with medical goods in the context of COVID-19. He said, "We make the best medical equipment in the world and you have some people like the European Union, they don't take it because they have specifications that don't allow our equipment in because it is designed in a different way even with a better way it is designed." They have been playing games against us for years and no president has ever done anything about it." Trump continued his often-stated mantra of unfair treatment stating, "But we have been treated very, very unfairly by the European Union."
- Earlier in the month, on Wednesday, 18th U.S. tariffs on EU aircraft increased to 15%, according to a previous deadline announced by President Trump in conjunction with the WTO Airbus case involving tariffs on $7.5 billion of European imports. EU officials continue to emphasize the importance of reaching a larger understanding to end the 15-year aircraft dispute.
- Airbus spokesman Clay McConnell implored U.S. government to seek an agreement with the EU and end a dispute over aircraft subsidies that dates back over 15 years. McConnell said, "The evolution of the global COVID-19 pandemic and its impact on the aviation industry reinforces the need to put this outdated case behind us and find a sustainable way forward for our industry."
- A USTR spokesperson noted efforts continue to negotiate a broader outcome and hoped the additional duties would spur Brussels to halt illegal government subsidies to Airbus. "It's important to keep in mind that the WTO determined the EU's massive illegal subsidies to Airbus cost our aerospace companies and workers hundreds of billions of dollars in lost revenue," said the USTR spokesperson.
- In earlier statements, EU officials proffered lowering certain agriculture barriers such as GMOs as part of a mini trade deal, but broader concessions such as tariffs or revamping EU laws and regulations are not in the offering. As noted earlier, EU Trade Commissioner Phil Hogan cancelled his trip to Washington, DC next amid swirling concerns regarding the spreading coronavirus.

U.S. - U.K. Trade Developments

- U.S-U.K. trade talks, which were expected to start this month, are delayed due to several developments in both countries stemming from the global health crisis. President Trump's expansion of the recent travel ban on the EU to now include U.K. and Ireland, certainly delays or precludes any face-to-face negotiations. Sources indicate that some groundwork may continue through virtual meetings and both sides are committed to moving forward.
- In a related matter, the U.K. and EU trade talks face another hurdle as both lead negotiators announced testing positive for COVID-19 and entering quarantine. David Frost, the U.K.'s chief negotiator, and Michel Branier, Frost's EU counterpart confirmed testing positive, though they had not met in person since the first round of talks in Brussels two weeks ago. While the scheduled talks in London were earlier postponed due to COVID-19 complications, this development heightens concerns that the U.K. and EU governments will miss the December 31, 2020 deadline to formalize the details of a post-Brexit agreement.

U.S. - Kenya Trade Developments

- Last week, USTR issued the Federal Register notice soliciting comments to formulate U.S. negotiation objectives for a U.S. – Kenya trade agreement. Interested parties can submit written comments by April 15 and request opportunity to testify at a hearing scheduled for April 28. USTR indicated it seeks feedback on general and product-specific negotiating objectives; barriers to trade in goods and services; ways to address export priorities and import sensitivities; and transparency issues, among other trade areas.
- As noted earlier, USTR formally notified Congress of its intent to undertake trade talks with Kenya, starting the 90-day clock prior to commencement of official negotiations. The USTR letter(s) said that the U.S. will begin negotiations "as soon as practicable," but not before 90 days from now, or June 15." The letter also affirmed that USTR will publish its formal negotiating objectives at least 30 days before talks begin, a requirement under Trade Promotion Authority (TPA), and USTR committed to working "closely and transparently" with Congress throughout the process.
- According to a USTR fact sheet, Kenya is the United States' 98th-largest trading partner in goods, with $1 billion in two-way trade in 2018. Major U.S. imports include apparel, tree nuts, essential oils, and coffee, while Kenya's major imports include aircraft, machinery and agricultural goods.

U.S.-India Trade Developments

- Despite the government leaders and trade officials pivoting resources and attention to stemming the fallout from COVID-19, The U.S. – India Business Council remains optimistic that prior trade discussions provided important groundwork for future trade talks. U.S.-India Business Council Vice President Amy Hariani said last week that Trump's visit to India in February revitalized the potential for bilateral trade talks. She noted a promising "level of energy" on both sides suggesting a limited trade deal remains possible this year, which might provide the impetus for a larger deal in the future. "I think both governments are eager to get this done in the next few months; it just depends on how COVID-19 will effect everything," she continued. Hariani acknowledged both countries are entirely focused on managing COVID-19 and should boost coordination on trade issues in the context of the global pandemic. India recently instituted a 21-day nationwide shutdown.
- President Trump returned from visiting India in February without securing a limited trade deal. During the visit President Trump and Prime Minister Modi announced they had "agreed to initiate negotiations for a bigger deal," as ambitions for quick mini deal remained elusive. Trump stated the two sides "have made tremendous progress on a comprehensive trade agreement." Trump said that a deal could be achieved toward the end of the year but offered that if there's no trade agreement "we will do something else that will be very satisfactory."
- A primary motivation for India in the trade deal is restoration of India's GSP benefits, valued at approximately $6.4 billion. The U.S. earlier revoked India's GSP benefits and is calling for reciprocal market access in India for agriculture products, industrial goods, and services in order to restore GSP.
- According to USTR, the United States is India's second-largest trade partner after China, and bilateral goods and services trade climbed to a record $142.6 billion in 2018. The United States had a $23.2 billion goods trade deficit in 2019 with India, its 9th largest trading partner in goods.

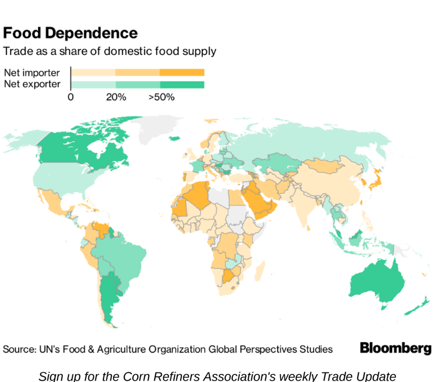
Suspension Agreements

Sugar Suspension Agreement

- No significant updates on the pending CSC Sugar complaints with the Court of International Trade (CIT). CSC is contesting the newly revised agreement announced by Commerce in January 2019 citing "the failure of Commerce to provide a reasoned explanation for the inclusion of both the bulk shipment provisions and the changes in the polarity standards in adopting the amendment rendering the amendment unsupported by substantial evidence and contrary to law."
- In January 2019 the Department of Commerce announced signing of the amended Sugar Suspension Agreement. In the notice Commerce reported, "…sugar producers/exporters accounting for substantially all imports of sugar from Mexico have signed an amendment to the Agreement Suspending the Antidumping Duty Investigation on Sugar from Mexico (AD Agreement). The amendment to the AD Agreement modifies the definitions for sugar from Mexico, revises the reference prices for the applicable sugar from Mexico, and provides for enhanced monitoring and enforcement mechanisms."

General Trade/WTO Reform

- The WTO is weighing rescheduling options for the 12th Ministerial Conference (MC12) after suspending the meeting previously planned for June 2020 due to the coronavirus pandemic. WTO discussions have centered on next June or even December 2021 as the most likely candidates depending on the availability of a venue, according to a recent WTO communication. Azevêdo and New Zealand Ambassador David Walker, the General Council chair, conducted conference-call consultations with nearly 30 delegations, including those that coordinate groups of members. Specifically, Azevêdo and Walker sought input on three potential options for a rescheduled ministerial: The end of 2020, mid-2021 or the end of 2021.
- Previously slated for early June in Nur-Sultan, Kazakhstan, WTO Director-General Roberto Azevêdo -- at the request of Kazakh officials – postponed the MC12 amid the COVID-19 outbreak. In addition, WTO staff are working remotely and several priorities including fisheries negotiations, are struggling to move forward. The fisheries negotiating group has reverted to written questions and comments to continue negotiations after a virtual meeting became unworkable due to technical difficulties and government restrictions regarding COVID-19.
- Other negotiations or committees anticipate pursuing virtual meetings when restrictions ease or reverting to exchange of hard copy comments. Case in point, WTO Agriculture negotiations will resume with exchange of paper copies according to the Committee chair. Ambassador John Deep Ford from Guyana told members they should make "best use" of their time despite the suspension of WTO meetings as a result of the coronavirus pandemic, Ford said. "[W]ith determination and flexibility, members will be able to make progress and take a step forward in achieving our collective goal towards establishing a fair and market oriented agricultural trading system, enabling it to effectively address the challenges facing it," he said.
- Meeting virtually last week, G20 leaders committed to enhance global cooperation to fight the coronavirus pandemic, and to ensure any "emergency" trade measures are limited and temporary. In a joint statement the leaders emphasized, "Emergency measures aimed at protecting health will be targeted, proportionate, transparent, and temporary." The statement continued, "We commit to continue working together to facilitate international trade and coordinate responses in ways that avoid unnecessary interference with international traffic and trade." Additionally, said they would direct their trade ministers to assess "the impact of the pandemic on trade."
- According to a study from Global Trade Alert, more than 50 governments have implemented some type of export restrictions on medical supplies and equipment in response to the pandemic. Several observers have cautioned that such measure could drive up prices and constrain supplies.
- WTO Director General Roberto Azevêdo warned global trade will decline sharply, exceeding the contraction during the 2008 financial crisis. He said, "Recent projections predict an economic downturn and job losses that are worse than those of the global financial crises a dozen years ago." He continued, "In a few weeks, the WTO will release our regular trade forecast and our economists are still crunching the numbers, but they foresee a very sharp decline in trade." He urged transparency among WTO members in sharing trade-related policies taken in response to COVID-19. He emphasized that open trade is critical to addressing and rebounding form the current global pandemic. "Keeping trade open and investment flowing will be critical to keep shelves plentiful and prices affordable" he said. "And once the medical crisis begins to recede, trade will allow countries to help each other, bringing faster and stronger economic recovery for us all."
- Last Friday 16 WTO member countries announced they have developed alternative arrangement to address the defunct Appellate Body system. Known as The Multiparty Interim Appeal Arbitration Arrangement, the 16-country group emphasized they remain committed to a "functioning, two-step dispute settlement system at the WTO." Participating countries are Australia, Brazil, Canada, China, Chile, Colombia, Costa Rica, the European Union, Guatemala, Hong Kong, Mexico, New Zealand, Norway, Singapore, Switzerland and Uruguay. Under the alternative approach, the 16 countries agreed to solve any appeals or disputes among themselves. "This is a stop-gap measure to reflect the temporary paralysis of the WTO's appeal function for trade disputes," said Phil Hogan, EU Trade Commissioner. He continued, "This agreement bears testimony to the conviction held by the EU and many other countries that in times of crisis working together is the best option. We will continue our efforts to restore the appeal function of the WTO dispute settlement system as a matter of priority." According to sources, the Multiparty Interim Appeal Arbitration Arrangement closely tracks the existing WTO appeal rules and can be used between any members willing to join.
- As countries consider limiting food and agriculture exports and consumers' demand surges for food products amidst the spreading COVDI-19 pandemic, WTO Director Roberto Azevedo has called on national leaders to limit the use of trade restrictive measures and cause further disruptions to global supply chains. "The current COVID-19 pandemic represents an almost unprecedented health crisis, and members are understandably responding by introducing legislation and policies to seek to combat this health emergency," according to the WTO statement. "These include measures that are trade-related, such as export measures and economic support programmes." Below is a separate analysis of dependency of global trade flows for food products.



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