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G20 Trade Ministers Discuss WTO Reform, IP Waivers

A reformed World Trade Organization dispute settlement system must reflect the needs of all WTO members, even those that traditionally have not turned to the formal dispute mechanism, according to US Trade Representative Katherine Tai. Ms. Tai convened an informal dialogue on WTO dispute settlement reform on the sideline of the G20 trade, investment and industry ministerial meeting in Bali. The meeting called by USTR has assumed significance as member countries are now committed to securing themselves a “fully functioning system” at WTO by 2024, in view of the WTO’s June [MC12 Outcome Document](#)

During the meeting, Ms. Tai emphasized that the ongoing reform conversation should continue to work towards a system that meets the needs of all WTO members, according to a readout from her office. After outlining US areas of interest, she invited participants to offer views on possible improvements to dispute settlement, including how a reformed dispute settlement system can better help members resolve a dispute in an efficient and cost-effective manner.

The United States for years has made clear its unhappiness with the WTO’s dispute settlement system, especially the Appellate Body. Washington argues that the AB has essentially been writing WTO rules through its decisions. As a sign of US disagreement with the AB, the United States continues to block the appointment of any new panelists to the body – effectively killing the AB.

Members also discussed starting early talks on the divisive issue of granting IP waiver for COVID-19 diagnostics and therapeutics by December, in sync with the decision made at MC12. The issue of finding a permanent solution to the problem of public stockpiling of food grains also reportedly came up. It is relevant to note that US, Australia, Canada, Brazil, and Thailand continue to scrutinize [India’s food procurement program](#), calling for joint consultations to determine if the related measures meet the requirements for “peace clause”.

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No Tariffs on Neodymium Magnets

President Biden will not impose national security tariffs on imports of neodymium magnets, in keeping with recommendations released last week by the Commerce Department. The magnets, used in electric vehicles and wind turbines, among other products, are mostly imported from China. The decision is based on a Section 232 national security investigation launched by Commerce last year in response to the Administration's resilient supply chains initiative.

Commerce's Bureau of Industry and Security concluded that US reliance on imports of the powerful magnets does pose a national security concern. But at the same time, the department recommended against restricting imports through tariffs or other means because the magnets are essential to national security.

"Despite the heavy dependence of the United States on direct and indirect imports of NdFeB magnets, the Department currently recommends that the Administration not impose tariffs, quotas, or other import restrictions on NdFeB magnets or component products," according to the report. "Given the current severe lack of domestic production capability throughout the magnet supply chain, tariffs and quotas would have an adverse impact on consuming sectors and might incentivize businesses to move operations incorporating NdFeB magnets offshore. In both industry meetings and public comments, most representatives of consuming sectors oppose the imposition of trade restrictions for these reasons."

Promoting US Production

Instead of restricting imports, Commerce is recommending steps to incentivize the production of the magnets in the United States and to work with allies to develop a more reliable supply chain. The recommendations include:

- The US Government should engage with allies through existing fora to efficiently develop production from diverse sources, promote research on NdFeB magnet-related technologies, encourage intellectual property licensing, and cooperate on foreign investment review mechanisms.

Bolster the U.S. NdFeB magnet industry by targeting domestic supply:

- Establish a tax credit for domestic manufacturing of rare earth elements, NdFeB magnets, and NdFeB magnet substitutes.
- Continue to direct Defense Production Act (DPA) Title III funding to firms in the U.S. NdFeB magnet industry, in particular to establish metal refining and alloy production facilities.
- Encourage eligible NdFeB magnet industry participants to use Export-Import Bank financing through the Make More in America Initiative and the China and Transformational Exports Program.
- Allocate additional funding to NdFeB magnet industry participants through other applicable instruments, such as the Bipartisan Infrastructure Law.

- Use the Defense Priorities and Allocations System to facilitate NdFeB magnet industry participants' acquisition of critical equipment and feedstock.
- Evaluate the use of export controls for domestic producers who face difficulties acquiring feedstocks from domestic sources due to competition with foreign consumers.
- Increase the National Defense Stockpile inventories of rare earth elements and other strategic and critical materials related to NdFeB magnets.

To promote the development of a domestic industry by enhancing domestic demand the U.S. Government should:

- Establish a forum under a lead U.S. Government agency to facilitate cooperation and share information about industry-wide issues between producers and consumers of NdFeB magnets, alloys, rare earth metals, and rare earth oxides. In particular, the U.S. Government should use DPA Title VII to promote offtake agreements using voluntary agreements.
- Promote the recycling and reprocessing of NdFeB magnets by developing labeling requirements for end-of-life products using NdFeB magnets, leveraging the Defense Logistics Agency's Strategic Material Recovery and Reuse Program, U.S. Government-owned data centers, and other U.S. Government-owned products like electric vehicles to establish a source of recyclable feedstock, and exploring reuse of other potential feedstocks such as heavy mineral sands and coal tailings.
- Mandate minimum domestic and ally content requirements for NdFeB magnets used in U.S. Government-owned electric vehicles and offshore wind turbines that power U.S. Government-owned buildings. NdFeB magnets used in these products should be produced domestically or by allies and contain feedstock sourced domestically or from allies. To minimize disruption, content requirements can be phased-in and waived if there are insufficient eligible sources.
- Establish a consumer rebate for products, such as electric vehicles, that use U.S. or ally produced NdFeB magnets.

To support the medium- to long-term development of the U.S. NdFeB magnet industry and enhance the resiliency of the U.S. NdFeB magnet supply chain, the U.S. Government should:

- Continue to fund research to reduce the use of rare earth elements in NdFeB magnets, develop magnets that can substitute for NdFeB magnets, and develop technologies that avoid the use of magnets – including NdFeB magnets – in electric vehicle motors and wind turbine generators.
- Support the development of the human capital required by the nascent NdFeB magnet industry, including materials scientists and production line workers, through applicable funding sources.
- Continue to monitor the NdFeB magnet value chain to ensure that U.S. and ally firms are not adversely impacted by non-market factors or unfair trade actions, such as intellectual property violations or dumping.

*BIS [Fact Sheet](#) and [Report](#); **Related:** *Comments Sought on 2024 Annual [Materials Plan](#) from the National Defense Stockpile Market Impact Committee [\[87 FR 58058\]](#)**

Secondary Russia Sanctions Framework Proposed

Senate Banking Committee members Sens. Chris Van Hollen (D-Md) and Pat Toomey (R-Pa) are proposing giving the Administration new sanctions authority to aid in efforts to sever funding to Russia's defense sector.

At a Banking hearing last week on the effectiveness of US sanctions on Russia for its attack on Ukraine, the senators said their legislative proposal would ensure outside countries comply with a G7 initiative to cap the price of Russian oil exports. The aim of the G7 initiative is to undermine Russian profits from its oil exports, which have been on the rise. Imposing secondary sanctions on those willing to pay more than the price cap will ensure that goal is met, the senators said.

"In order to successfully enforce the price cap, it's clear the administration requires new authority from Congress, which is exactly what our framework will provide," the senators said in a joint statement. "By imposing strong secondary sanctions, our framework also provides the administration with the tools needed to hold accountable the financial institutions supporting those countries involved in rampant war profiteering from Russian exports."

At the hearing, Sen. Toomey said he is particularly concerned that China and India would be willing to pay above the cap, meaning that Russia would continue to enjoy strong revenues from its oil exports.

Administration Response

But a Treasury Department official testifying at the hearing suggested that the legislation would not be necessary. Treasury Assistant Secretary for Terrorist Financing and Financial Crimes Elizabeth Rosenberg said that price cap in itself would provide a strong incentive for countries outside the G7 to negotiate lower prices for the purchase of Russia oil. The Administration has been talking to countries outside the G7 about the price cap proposal and countries that purchase from Russia want to pay lower prices, she said.

Most senators attending the hearing expressed support for the price cap proposal, but questioned whether it will be effective without secondary sanctions. In particular, concerns were raised that China would be willing to pay above the cap in order to support Russia's invasion of Ukraine.

Proposed Framework

Sens. Van Hollen and Toomey are proposing the following sanctions framework:

- **Price Cap on Russian Oil:** The President sets a price cap on Russian seaborne oil and petroleum products in consultation with allies and partners no later than March 2023 – each following year, the price cap is lowered by one third until it reaches the break-even price within 3 years (i.e. Russia is not making any profit from its exports).
- Each year, the President may suspend the price reduction with a determination that such action would result in an unacceptable increase in the global price of oil, subject to a Congressional override.

- Cap enforced with full blocking sanctions or correspondent account and payable through account termination sanctions on foreign financial institutions that engage in transactions that exceed the price cap. Foreign financial institutions include, but are not limited to, any foreign entity involved in the trade finance, insurance, reinsurance, and brokerage of Russian oil and petroleum products transactions.
- Imposition of sanctions with respect to countries increasing purchases of Russian oil, oil products, gas and coal.
- EIA will provide a public report within 30 days that provides an estimate of the total volume of oil, oil products, gas, and coal imported from Russia to each country prior to Feb. 24, 2022. The Administration will then certify every subsequent 90 days whether a country's oil, oil products, gas and coal imports, by volume, significantly exceed that country's benchmarks.
- For those countries that have significantly exceeded their pre-war benchmarks, the President must impose full blocking sanctions on foreign financial institutions that the President determines have knowingly engaged in a significant transaction or series of transactions relating to the purchase of a covered commodity.
- Sanctions sunset after 7 years or terminate when the President certifies that Ukraine has reached a diplomatic agreement with Russia supported by the US and that it is in the national security interest to terminate these sanctions.
- There is a national interest waiver for all sanctions in the bill, subject to Congressional override.

Related: [The Cato Institute](#): Russian Oil Price Controls: How They Would Work and What They Might Do

US, EU Officials Talk Labor

US and European officials met yesterday to discuss how to prepare workers for fast-paced technological change and the impact of digital trade on workers. The meeting was the first technical meeting of the transatlantic tripartite Trade and Labor Dialogue, launched under the US-European Union Trade and Technology Council.

Officials from the US Trade Representative's Office and Labor Department met with European counterparts, along with union and business leaders, according to USTR. Participants shared concerns related to the future of work and the impacts of the digital economy on workers, such as how best to protect workers in the face of rapid technological change and considerations on the impact of digital economy and trade on workers, USTR said. They also explored measures that could proactively shield or support workers, consumers and businesses from inflationary pressure and discussed how to advance cooperation to benefit workers in the global economy.

Labor Department Readout: <http://www.dol.gov> issued: 9/20/22.

More Regulations on Supply Chains in Europe

The European Commission has unveiled a new [proposal](#) to enact a new Single Market Emergency Instrument, that empowers the bloc with “emergency powers” to regulate supply chains. The proposal will ensure that “essential goods” circulate exclusively within the European Union during what it determines to be an “emergency”. Firms would, thus, need to disclose information on production capacities and stocks of crisis-relevant goods.

The proposal is part of a larger supply resiliency trend in Europe, that is likely to increase due diligence complexities for businesses. With the measurability of supply chains having developed drastically over the last few years, addressing information gaps has become crucial. EU is accordingly working on a corporate sustainability due diligence [directive](#) that would require any EU business with more than 500 employees and a global turnover of €150mn to come up with a strategy to manage environmental and human rights standards across their supply chains, and ensure that their business model is compatible with the limiting of global warming to 1.5C, in line with the Paris Agreement.

Meanwhile, European Commission published its *Annual Report on its Trade Defence Activities of 2021*. The [Report](#) concludes that 462,000 EU jobs were directly protected by the EU's trade measures in 2021 in key EU manufacturing sectors such as aluminum, steel, ceramics, and green technology.

The EC also announced the commissioning of a [study](#) on effectiveness of regulations on Due Diligence Obligations for Importers of Tin, Tantalum, Tungsten and Gold from conflict-affected and high-risk areas.

Crypto Regulation Gains Momentum

Under Secretary of the Treasury Brian Nelson held a Stakeholder Meeting at the Center for a New American Security September 21st to discuss Treasury's [Action Plan to Address Illicit Financing Risks of Digital Assets](#). He noted that the use of virtual assets for illicit activities remains below the scale of traditional finance and represents a small portion of overall digital asset use, but that the increases in illicit finance in digital assets in absolute terms continues to present national security risks. **Treasury called for comments** in a September 20th Federal Register Notice [[87 FR 57556](#)]

Speaking at a Senate Committee on Banking, Housing and Urban Affairs hearing Sept 20th, Treasury's Assistant Secretary for Terrorist Financing and Financial Crimes said that Russia could use cryptocurrencies to evade US and other sanctions. Responding to a question from Senator Elizabeth Warren, D-Mass, Elizabeth Rosenberg acknowledged that Kremlin could turn to increased use of digital assets. In the past month, the Treasury Department has already [sanctioned](#) a virtual currency mining agency, and [designated](#) twenty-two individuals and two entities for helping Russia digitally finance the war on Ukraine.

In a related development, the Department of Justice has [announced](#) significant actions regarding digital assets, including the establishment of the nationwide Digital Asset Coordinator (DAC) Network to combat the threat posed by the illicit use of these assets in facilitating crime, and undermining

national security. This follows the release of the first-ever [Comprehensive Framework for Responsible Development of Digital Assets](#), by the White House that has identified six key priorities: consumer and investor protection; financial stability; illicit finance; U.S. leadership in the global financial system and economic competitiveness; financial inclusion; and responsible innovation.

Tai on “Rebalancing Tariffs”, Kendler on Dual-Use, Axelrod on End-Use

US Trade Representative Katherine Tai and Assistant Secretary for Export Administration Thea Kendler discussed China and Russia trade policy during their travels in the Far East last week.

Speaking to reporters from Cambodia, **Ambassador Tai** [addressed](#) the Biden administration’s trade and supply chain-related initiatives in Southeast Asia. She committed to enhancing cooperation with ASEAN and other Indo-Pacific nations on issues including trade facilitation, labor and environmental standards, and digital trade. Responding to a question on the ongoing trade war with China, USTR Tai pushed back to suggest that the tariffs toward China are “not punitive in nature”. She clarified that the tariffs that were first imposed in 2018, were not sanctioning tariffs, and were instead “rebalancing tariffs” that are trying to “level the playing field to overcome unfairness”.

In a press [briefing](#) from Singapore, Assistant **Secretary Kendler** conceded that it was “likely that the U.S. will tighten export control on dual-use products”. She further stated that the Department has issued directives for certain companies to obtain BIS approvals for trade involving specific advanced semiconductors. **Matthew Axelrod**, Assistant Secretary for Export Enforcement further informed the press members that the Department has been monitoring US exports to do end-use checks to scrutinize diversion points that Russia may be taking advantage of.

National Security Review of YMTC Urged

A bipartisan group of senators is urging the White House to prevent Apple from purchasing memory chips for further iPhones from Yangtze Memory Technologies Company, a state-owned company, citing national security concerns.

Senate Select Committee on Intelligence Chairman Mark Warner (D-Va) and Vice Chairman Marco Rubio (R-Fla) wrote to Director of National Intelligence Avril Haines calling for a public analysis and review of YMTC and the risks it presents to US national security. Senate Majority Leader Chuck Schumer (D-NY) and Sen. John Cornyn (R-Texas) also signed the [letter](#), released September 22.

The senators wrote that “any decision to partner with YMTC, no matter the intended market of the product offerings developed by such a partnership, would affirm and reward the PRC’s distortive and unfair trade practices, which undermine US companies globally by creating significant advantages to Chinese firms at the expense of foreign competitors.”

The Administration last year described YMTC as China's "national champion memory chip producer," which supports the CCP's efforts to counter U.S. innovation and leadership in this space," the senators noted.

"Policymakers have for several years now conveyed to the American public the importance of a competitive semiconductor industry to US national and economic security," they wrote. "A partnership between Apple and YMTC would endanger this critical sector and risk nullifying efforts to support it, jeopardizing the health of chipmakers in the US and allied countries and advancing Beijing's goal of controlling the global semiconductor market."

The senators in July wrote to Commerce Secretary Gina Raimondo urging that YMTC be added to the Bureau of Industry and Security's Entity List because of the national security concerns the Chinese company poses.

In their letter, the senators called for a comprehensive review and analysis of YMTC and the threat that a supplier partnership arrangement between it and Apple would pose to US national and economic security. They said the review should consider, among other issues:

- How the CCP supports the YMTC as part of its plan to bolster and indigenize China's semiconductor industry and to displace chipmakers from the United States and allied and partnered nations;
- YMTC's role in assisting other Chinese firms, including Huawei, to evade US sanctions;
- YMTC's role in the PRC's military-civil fusion program and its linkages to the People's Liberation Army; and
- The risks to US national and economic security of this potential procurement.

*** Briefs ***

Agriculture / Food Crisis. UN Food and Agriculture Organization, International Monetary Fund, World Bank Group, World Food Programme and the WTO issued a joint [statement](#) September 21st, calling on governments to take urgent and coordinated action to address the acute food crisis

UK's New PM Lists Trade Priorities, No Deal with US. Prime Minister Liz Truss has made it clear that a trade deal with the US is unlikely to materialize in the "short to medium term," according to the *Associated Press*. This is in sharp contrast to her predecessor who prioritized support for the trade deal. Her priorities, she stated, were obtaining accession to the Trans-Pacific Trade Partnership, and striking bilateral trade deals with India and the Gulf Cooperation Council of States, including Saudi Arabia and Qatar.

USMCA Environment Committee met September 23rd, reviewing cooperation activities and priorities, including an update on public Submissions for Enforcement Matters (SEMs). The SEM process is a cornerstone of public participation and engagement within the USMCA Environment chapter. [Joint Statement](#).

Los Alamos Lab – China Axis. Strider Technologies has published a [report](#) documenting the talent exchange between post-doctoral fellows and researchers at the Los Alamos National Laboratory and China’s military-research fusion. Since returning to China, Los Alamos alumni have helped the PRC advance key military and dual-use technologies in areas such as hypersonics, deep-earth penetrating warheads, unmanned autonomous vehicles (UAV), jet engines, and submarine noise reduction.

WTO DDG Ellard Calls for Multilateralism. In a keynote [address](#): “Restoring Multilateralism — Making International Trade Work for All” delivered at an event organized by the Institute of International and European Affairs on 19 September, Deputy Director-General Angela Ellard discussed trade multilateralism needed to address challenges of global commons.

OFAC / Further Iran Sanctions were imposed on Iran’s Morality Police and senior security officials for violence against protesters and the death of Mahsa Amini. On September 14, the LEF’s Morality Police arrested 22-year-old Mahsa Amini for purportedly wearing a hijab improperly and sent her to an “educational and orientation” class at police headquarters. She was transferred to a hospital that same day in a coma and died two days later from internal injuries sustained while in Morality Police custody.

OFAC / Iran Internet-based Sanctions Treasury’s Office of Foreign Assets Control (OFAC) is issuing [Iran General License D-2 "General License with Respect to Certain Services, Software, and Hardware Incident to Communications"](#) and publishing [three Iran-related Frequently Asked Questions \(1087 - 1089\)](#). The intent of the General License is to facilitate internet access as Tehran clamps down on civil unrest related to the case of Mahsa Amini.

BIS/ Deemed Export Licensing . Commerce has published updated [guidelines](#) for exporters to use in submitting license applications for foreign nationals pursuant to the “deemed export” rule.

BIS / More Iran Aviation Sanctions. Commerce added three Boeing 747s operated by Iranian carriers to [the list of sanctioned](#) aircraft for their involvement in providing cargo flight services on U.S.-origin aircraft to Russia. The Carriers were already subject to sanctions and the cited aircraft are legendary in MRO circles for the ruses used to keep them airborne. There are now a total of 183 aircraft identified on the list for apparent violations of U.S. export controls.

CBP / Interest on Overdue Accounts and Refunds rates increased to 6 percent, double those in effect in March 2022, though still less than the 10 to 20 percent rates of the 1980s. [\[87 FR 57502\]](#)

ITA / Solar Solar Cells and Modules from Southeast Asia Final Rule. Effective November 15th Commerce is issuing this final rule to implement Proclamation 10414, extends the time for, and waives, the suspension of liquidation, the application of certain AD/CVD duties, and the collection of cash deposits on applicable entries of certain crystalline silicon photovoltaic cells, whether or not assembled into modules, that are completed in the Cambodia, Malaysia, Thailand, and Vietnam using parts and components manufactured in China that are not already subject to an antidumping or countervailing duty order. [\[87 FR 56868\]](#).

State / Cyprus Lifting of Defense Trade Restrictions. Secretary of State Antony J. Blinken determined and certified to Congress that the Republic of Cyprus has met the necessary conditions under relevant legislation to allow the approval of exports, re-exports, and transfers of defense articles to the Republic of Cyprus for fiscal year 2023. The certification comes as Cyprus continues to cooperate with the United States government in efforts to implement reforms on anti-money laundering regulations and financial regulatory oversight, and that the Government has made and is continuing to take the steps necessary to deny Russian military vessels access to ports for refueling and servicing

State/Exim Minerals Security Partnership President and Chair of the Export-Import Bank of the United States (EXIM) Reta Jo Lewis yesterday joined Secretary of State Antony Blinken, Under Secretary Jose Fernandez, and senior ministers from nearly 20 nations for a multilateral discussion on the new [Minerals Security Partnership](#). The MSP seeks to bolster the security, diversity, and resiliency for supply chains of critical minerals, which are essential in driving the clean energy transition.

ExIm, Korea Sign Co-Finance Deal US Export-Import Bank President and Chair Reta Jo Lewis signed a co-financing agreement September 22 with the Korea Trade Insurance Corporation to create a one-stop shop facility that will provide joint support for US and Korean export projects in new and strategic industries, including critical minerals. The agreement also outlines the ways the two will cooperate in areas of common interest, including climate-friendly projects, sub-Saharan Africa, transformational exports and global supply chains.

*** Appointments ***

CHIPS Implementation Team Named

President Biden announced the leadership team for two new offices asked with guiding implementation of over \$50 billion in funding provided by Congress to encourage domestic production of semiconductor chips. The two CHIPS for America offices will be housed at the White House and the Commerce Department.

Ronnie Chatterji has been tapped to serve as the White House Coordinator for CHIPS

Implementation at the National Economic Council. His task will be to manage the work of the CHIPS Implementation Steering Council, as laid out in President Biden's Executive Order on CHIPS Implementation. He will work closely with the National Security Council, the Office of Science and Technology Policy, Commerce and the Steering Council to ensure effective interagency coordination. Until now, Mr. Chatterji has served as Commerce's chief economist.

At Commerce, Michael Schmidt will serve as Director of the CHIPS Program Office, **Eric Lin** will serve as Interim Director of the CHIPS Research and Development Office and **Todd Fisher** will serve as Interim Senior Advisor in the CHIPS Program Office, housed within NIST.

In addition, **Donna Dubinsky** will serve as Senior Counselor to the Secretary for CHIPS Implementation and **J.D. Grom** will serve as Senior Advisor to the Secretary on CHIPS Implementation – both working out of the Office of the Secretary.

Senators Cheer USDA Trade Nominee. The Senate Agriculture Committee gave a warm reception to **Alexis Taylor**, nominee as Undersecretary of Trade and Foreign Ag Affairs. She would serve under **Doug McKalip** if he is confirmed by the full Senate as Chief Ag Negotiator. She has broad, bipartisan support from ag groups. The Ag Committee Chair and Ranking Member hope for a full vote this week.

*** Calendar ***

Sept 28th UKCA Marking – How to Comply Webinar The UKCA (UK Conformity Assessed) marking is a new UK product marking that is used for goods being placed on the market in Great Britain (England, Wales and Scotland). It covers most goods which previously required the CE mark. UKCA marking became part of UK law on exit day, 31 January 2020 and will be mandatory as of January 1, 2023. The UKCA mark applies to most goods previously subject to the CE marking. **September 28, 2022 11:00 am EDT/8:00 am PDT. Registration [here](#).** For questions, contact: Anastasia Xenias - Anastasia.Xenias@trade.gov, or Robert Straetz - Robert.Straetz@trade.gov

September 29th Protecting Your Business Interests: Corporate Espionage, Global Security & Compliance Learn the ways to mitigate your company's overall risk, comply with U.S. Export Control Laws, travel safely abroad, and carefully evaluate international business partners. his webinar is for US companies to hear from Senior Level Speakers from the Commerce and State Departments, Secret Service and FBI. **The webinar will take place on September 29, 12:30pm - 1:30pm EDT.** [Register](#)

October 5th – 6th ACE/AES Export Compliance Seminar It's critical to provide accurate data in your export filing using the Automated Commercial Environment (ACE) to avoid costly penalties. This 2-day virtual program features experts from the U.S. Census Bureau, Bureau of Industry and Security, and U.S. Customs & Border Protection to provide you with important training on these requirements. [Register \(\\$95\)](#)

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[The Washington Tariff & Trade Letter](#) and sister publication [The Export Practitioner](#) are being re-imagined for their second four decades, graphically and editorially

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