

5.3. Russia's involvement in WTO trade disputes¹

5.3.1. The crisis of the multilateral trading system, Trump's tariff policy, reforms, and the future of the WTO

In 2025, the key trends in global trade will include.^{2, 3}

- Deepening digitalization and growth in trade in AI-related goods.
- Greening of trade and China's growing role in it.
- Shift in trade flows towards Global South.
- Fragmentation of supply chains amid growing imbalances.
- Increased protectionism and a rise in tariff and non-tariff barriers.
- Growth in global overcapacity, falling steel prices, and an increase in unfair practices, leading to retaliatory measures.
- The need to reform the multilateral trading system (WTO).

The 14th WTO Ministerial Conference is scheduled for March 2026 in Yaoundé, Cameroon. Discussions are proposed within the framework of three tracks: institutional issues, fairness and balance in world trade, and contemporary challenges.⁴ The main issues of WTO reform include:^{5, 6, 7, 8, 9, 10}

- 1) Fairness of future regulation as the main focus of negotiations.
- 2) The need for fundamentally new, socially oriented approaches.
- 3) Understanding of WTO provisions on national security. According to the US, the application of Article XXI ("Exceptions for Security Reasons") of GATT 1994 allows for the introduction of any measures that the initiator deems necessary to protect security interests.¹¹

1. Authors: *Baeva M.A.*, Senior Researcher, Foreign Trade Studies Department, RANEPA; *Knobel A.Yu.*, Doctor of Economic Sciences, Senior Researcher, Foreign Trade Department, Gaidar Institute, Head of Foreign Trade Studies Department RANEPA, Scientific Director of the Institute for World Economy and Finance VAVT.

2. URL: <https://wto.ru/news/kruglyy-stol-sovremennye-trendy-razvitiya-mezhdunarodnoy-torgovli-segodnya-i-zavtra/>

3. URL: <https://wto.ru/our-blog/problema-izbytochnykh-moshchnostey-v-krn-elektromobili-i-reforma-vto/>

4. URL: <https://wto.ru/our-blog/budushchee-vto-i-interesy-rossii-prioritety-reformy/>

5. URL: <https://wto.ru/our-blog/para-slov-o-spravedlivosti-v-mezhdunarodnoy-torgovle/>

6. URL: <https://wto.ru/our-blog/budushchaya-mnogostoronnyaya-torgovaya-sistema-nam-po-puti-da-net/>

7. Ibid.

8. URL: <https://wto.ru/our-blog/obshchestvennyy-forum-vto-2025/>

9. URL: <https://wto.ru/our-blog/reforma-vto-na-perednem-plane-v-povestke-predstoyashchey-ministerskoy-konferentsii/>

10. URL: <https://wto.ru/our-blog/tramp-2-vyzovy-i-vozmozhnosti-dlya-vto/>

11. URL: <https://wto.ru/our-blog/budushchaya-mnogostoronnyaya-torgovaya-sistema-nam-po-puti-da-net/>

- 4) Reform of the Dispute Settlement Body (DSB, alternatives — Multilateral Provisional Appeal Arrangements (MPIA) and mediation). The DSB has been in crisis since 2019, when the US began systematically blocking the selection of members of the Appellate Body (AB). Although mediation is provided for in the WTO rules, it is used extremely rarely. WTO disputes are often too lengthy and politically sensitive. Mediation can be either part of the Understanding on Rules and Procedures Governing the Settlement of Disputes (DSU) or a third-party procedure. It allows the parties to focus on finding practical solutions to problems and resolving trade disputes, rather than assessing the measures under consideration for their compliance with WTO rules, unlike DSB.¹
- 5) Access for the most developed developing countries (Singapore or the Republic of Korea) to tariff and other preferences.
- 6) New rules for subsidies that would better distinguish between market-distorting support measures and reinforce beneficial ones.
- 7) Improved discipline in WTO members' compliance with transparency obligations, including notifications; the US has proposed a system for this.
- 8) Improved quality of administration and efficiency of the WTO Secretariat.
- 9) Reducing the growth of legal uncertainty, which leads to high losses for developed countries and even higher losses for developing countries.
- 10) Reforming negotiating instruments: multilateral, plurilateral (with a limited number of participants), etc.
- 11) Improving the effectiveness of the decision-making mechanism: currently, WTO members are increasingly using the inflexibility of the consensus rule to block decisions that are inconvenient for them.
- 12) Ensuring the relevance of WTO rules to modern conditions.
- 13) Discussion of alternatives to the WTO.
- 14) Lack of leadership: the US and the EU are losing ground, while China is gaining strength. Russia is developing bilateral trade and economic cooperation with many medium-sized countries, both developed and developing, although there are difficulties, including those related to the fact that since 2022, some countries have had clear political guidelines to avoid direct contact with the Russian delegation.²

An appellate body (AB) is needed to resolve about 70% of WTO trade disputes. When the US imposed additional tariffs, it violated WTO rules and regulations. At the same time, they blocked the work of the AB back in 2019, thereby preventing countries from making full use of the WTO trade dispute resolution mechanism, including the authorization to introduce retaliatory measures.³ Given its tariff policy, it is beneficial for the US that countries resolve conflicts in bilateral mee-

1. URL: <https://wto.ru/our-blog/mediatsiya-v-vto-ostorozhnyy-podkhod/>

2. URL: <https://wto.ru/our-blog/preodolenie-krizisa-liderstva-v-vto-rol-stran-sredney-vesovoy-kategorii/>

3. URL: <https://wto.ru/news/torgovlya-mezhdu-pravilami-i-ponyatiymi/>

tings rather than within the WTO.¹ Donald Trump takes a negative view of preferential trade agreements involving the US, such as those with Mexico and Canada (USMCA). The prospects for international trade largely depend on US decisions (reform or withdrawal from the WTO).²

5.3.2. Russia and the WTO dispute settlement mechanism

Russia joined the WTO on August 22, 2012, and since then has had access to the WTO dispute settlement mechanism in accordance with the DSU.³ The WTO dispute settlement procedure consists of five main sequential stages:⁴

- 1) *Bilateral consultations* (within 60 days of the request for consultations).
- 2) *Establishment of an arbitration panel (AP)* at the request of any disputing party and selection of members to consider the merits of the dispute (45 days from the date of submission of the request).
- 3) *Work of the AP* (6–9 months from the start of the arbitration panel's work) and acceptance of the AP report by the dispute settlement body (DSB) and DSB recommendations (approximately 60 days from the date of submission of the AG report).
- 4) *Consideration of the case by the appellate body (AB)* upon submission of an appeal by at least one of the parties (60–90 days from the date of submission), acceptance of the AB report by the DSB, and announcement of the DSB's recommendations to the parties (30 days from the date of submission of the AB report).
- 5) *Dispute Settlement Body* monitoring of the implementation of recommendations (no more than 15–18 months from the date of adoption of the Dispute Settlement Body report by the TG or AB).

According to data from the end of 2025, Russia had participated in 130 WTO disputes: in 9 as a plaintiff, in 11 as a defendant, and in 110 as a third party. In 2025, Russia initiated one dispute against the EU on cross-border carbon regulation (DS639) and joined four disputes as a third party (DS627, DS629, DS630, and DS636). Russia most often joins trade disputes initiated by the US (14% of WTO disputes in which Russia participates as a third party), the EU, China (13% each), Japan (8%), Indonesia (6%), and Canada (5%), as well as disputes against the US (25%), China (17%), the EU (15%), India (9%), Australia, Canada (5% each), and others. As a rule, Russia is the main party in WTO disputes with the EU, Ukraine, and the US.

1. URL: <https://wto.ru/news/mozhno-li-reanimirovat-vto/>

2. URL: <https://wto.ru/news/torgovlya-mezhdu-pravilami-i-ponyatiymi/>

3. URL: https://www.wto.org/english/tratop_e/dispu_e/dispu_e.htm

4. URL: <https://www.iep.ru/ru/publikacii/publication/rossiyskaya-ekonomika-v-2021-godu-tendentsii-i-perspektivy-vypusk-43.html>

As a plaintiff, Russia is interested in anti-dumping investigations and measures, particularly in the metallurgical and chemical industries, as well as subsidies and countervailing measures. At the end of 2025, 56 anti-dumping measures, 6 countervailing measures, and 20 special safeguard measures were in force against Russia, and one countervailing, 11 anti-dumping, and 8 special safeguard investigations were conducted, mainly by the EU, the US, and Ukraine.¹ Countries file complaints against Russia regarding TBT,² SPS³ measures, anti-dumping measures, investment measures affecting trade, tariffs, transit restrictions, import substitution, and export restrictions.

Most of the disputes in which Russia has participated as a third party concern the metallurgical industry, agriculture and food, the automotive and aircraft manufacturing industries, the chemical industry, the woodworking industry, and renewable energy sources (RES). Particular attention is paid to disputes concerning protective measures (anti-dumping, countervailing and special protective measures) and subsidies. Cases involving trade and economic sanctions and national security exemptions are of particular interest. Russia's participation as a third party is linked not only to significant trade interests, but also to its practice of participating in specific disputes and its systemic interest in the application of WTO rules and regulations. Sometimes Russia takes a position similar to that of the respondent.

Changes in 2025 regarding WTO trade disputes in which Russia is involved as a plaintiff

DS639: The EU and its member states — Cross-border carbon regulation mechanism (Russia)

On May 12, 2025, Russia submitted a request to the DSB for consultations with the EU regarding the EU Carbon Border Adjustment Mechanism (package) and EU export subsidies under the greenhouse gas emissions trading scheme (DS639).⁴

In October 2003, the EU adopted Directive 2003/87/EC establishing the EU Emissions Trading Scheme (ETS). After the system was introduced, the EU stated that there was a risk of carbon leakage as a result of the scheme. According to the EU, carbon leakage occurs when EU-based companies move the production of EUTS-covered goods abroad or when EU goods are replaced by similar imports from third countries. In May 2023, the EU adopted Regulation 2023/956 (“Establishing a mechanism for carbon border adjustment”), designed to prevent the threat from imports to EU production, as well as the export of production from the EU. The package

1. URL: https://www.economy.gov.ru/material/directions/vneshneekonomicheskaya_deyatelnost/dostup_na_vneshnie_rynki_i_zashchitnye_mery/reestr_ogranich_mer/

2. Agreement on Technical Barriers to Trade (TBT).

3. Agreement on the Application of Sanitary and Phytosanitary Measures (SPS).

4. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds639_e.htm

was adopted as a tool to preserve EU production and protect industries burdened by the CFC from imports. The CFC sets a limit on the total amount of greenhouse gas emissions that can be produced by installations covered by the system. This limit is expressed in emission allowances, with one allowance entitling the holder to emit 1 ton of CO₂ equivalent. Allowances are sold at auction, can be traded, or can be allocated for free. Where a sector or subsector is exposed to carbon leakage, each installation in that sector is allocated free allowances based on the export value of 100% of its baseline. Installations not included in this list will receive only 30% until 2026, with free allocation phased out by 2030.

Russia supports international efforts to combat climate change. Russia's request is for consultations on restrictive and discriminatory mechanisms created by the EU under the pretext of climate policy. The package is used as a tool to increase the EU's competitiveness and investment opportunities.

The EU is establishing a mechanism that, in particular, obliges the authorized declarant to purchase and surrender a certain number of certificates, which effectively introduces additional individual charges, similar to tariffs, on imports of certain goods into the EU from third countries. Among the goods covered by the package are cement, fertilizers, aluminum products, iron and steel, and products made from them. As a result, imports from these countries will attract new resources to the EU budget, effectively depriving the countries of origin of some of the financial resources needed to combat climate change domestically. In addition to import authorizations (authorized declarant) and certificates, the package includes requirements for monitoring, collecting, calculating, and reporting emissions (submitting a declaration), verifying embedded emissions, and accrediting verifiers. Economic operators face significant regulatory uncertainty. The package establishes significant trade barriers for goods imported into the EU that are subject to customs duties, including those originating in Russia, and restricts the right of third-country nationals to import goods subject to customs duties into the EU. Russia considers this measure to be a financial contribution by a government or public body that provides an advantage to certain sectors and subsectors that are considered to be at risk of carbon leakage in accordance with Article 1.1 ("Definition of a subsidy") of the Agreement on Subsidies and Countervailing Measures. In the complainant's view, this is a prohibited subsidy contingent on export performance. Russia considers the rules and requirements prescribed in the package to be incompatible with the EU's WTO obligations.

On May 22, 2025, the EU rejected Russia's request for consultations, stating that in the current extraordinary circumstances resulting from Russia's actions against Ukraine, consultations cannot be fruitful and lead to a mutually acceptable solution until Russia ceases its actions.

It is noted that the US may take a tougher stance on the Carbon Border Adjustment Mechanism (CBAM), as this package may be viewed by the US as a discriminatory measure that infringes on the interests of American companies. Such a posi-

tion would be beneficial to Russia and other countries that export energy-intensive products, which have consistently opposed the introduction of the Carbon Border Adjustment Mechanism (CBAM) at the WTO.¹

Changes in 2025 regarding WTO trade disputes in which Russia participates as a third party

In 2025, Russia joined four WTO trade disputes (DS627, DS629, DS630, and DS636) as a third party, bringing the total number of such disputes to 110. Russia is interested in disputes across a wide range of industries: metallurgy (25% of WTO disputes in which Russia has joined), agriculture (22%), mechanical engineering (10%), renewable energy (6%), the chemical industry (5%), the timber industry (4%), as well as certain commodities, tobacco (3% each), ICT goods, services, and intellectual property rights (2% each). Some of these disputes have already been resolved, and in a number of cases Russia has benefited (directly or indirectly) from its participation.

Most of the disputes to which Russia has joined as a third party are related to GATT 1994 (90%), which is traditional for the WTO trade dispute settlement mechanism. More than half of the complaints challenge domestic market protection measures (the Agreement on Subsidies and Countervailing Measures and the Agreement on Anti-Dumping (25% each), and the Agreement on Special Safeguard Measures (15%)). Russia is also interested in violations of the Agreement establishing the WTO (10%), the protocols on accession to the WTO (9%), the Agreement on Technical Barriers to Trade (TBT), the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS) (8% each), the Agreement on Agriculture, the Agreement on the Application of Sanitary and Phytosanitary Measures (SPS), the Agreement on Trade-Related Investment Measures (TRIMS) (7% each), etc. (Fig. 1).

DS627: Canada—Measures on certain goods originating in China (China)

On September 6, 2024, China submitted a request to the DSB for consultations with Canada regarding measures on certain Chinese-made goods. Canada initiated measures, united by a policy and intention to protect Canadian workers and key sectors of the economy from imports from China:

- An additional duty (100%) on electric vehicles.
- An additional duty (25%) on steel and aluminum products.
- Additional taxes and/or tariffs on certain solar energy products, critical minerals, semiconductors, permanent magnets, and natural graphite.

1. URL: <https://wto.ru/our-blog/tramp-2-vyzovy-i-vozmozhnosti-dlya-vto/>

Russian economy in 2025

Trends and outlooks

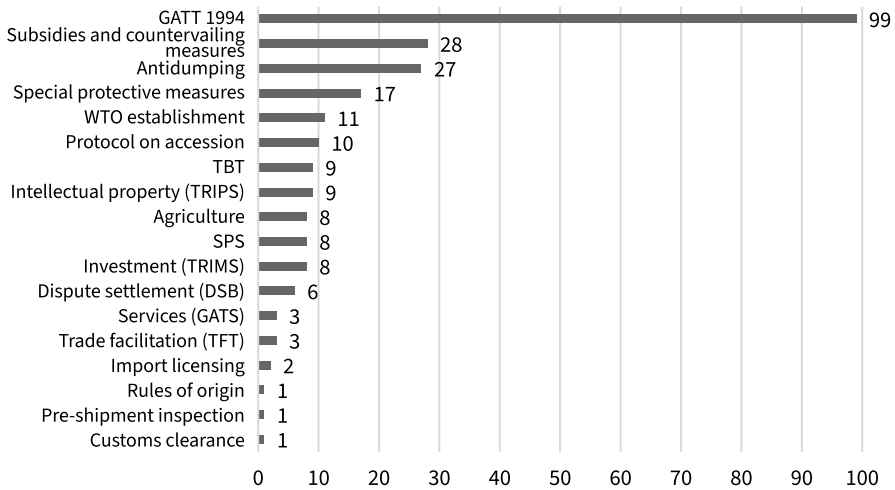


Fig. 1. Subject matter of WTO dispute agreements to which Russia has acceded as a third party, as of the end of 2025

Source: Own calculations on data from the official WTO website: https://www.wto.org/english/tratop_e/dispu_e/dispu_by_country_e.htm

China considers these measures to be discriminatory against imports into Canada of goods and materials of Chinese origin. In particular, these measures are inconsistent with Canada's obligations under Article II:1 ("Schedule of Concessions") GATT 1994 to grant China most-favored-nation (MFN) treatment, i.e., treatment no less favorable than that provided for in Canada's Schedule of Concessions and Commitments for the relevant goods and materials. With regard to electric vehicles, Canada's import duty binding level is less than 100%, and therefore the application of a 100% duty is inconsistent with the respondent's WTO obligations. The same applies to steel and aluminum products. The measures are inconsistent with Article I:1 ("General Most-Favored-Nation Treatment") of GATT 1994, as they do not immediately and unconditionally grant goods originating in China the benefits that Canada grants to imports of like goods from other member countries.

On May 12, 2025, China requested the establishment of a TRB, which was established on June 23, 2025. On August 20, 2025, China and Canada agreed to arbitration proceedings under Article 25 ("Arbitration") of the DSU in this dispute. The parties resorted to such procedures to enforce the MPIA.

Russia's interest is due to the fact that Canada is an unfriendly jurisdiction that applies sanctions against Russia, including increasing customs duties. Russia is interested in examples of challenging the introduction of additional duties in circumvention of the WTO, including in emergency situations, on issues of national security.

DS629: Turkey—Measures on electric vehicles and other types of vehicles from China (China)

On October 8, 2024, China submitted a request to the WTO for consultations with Turkey regarding additional duties on imports of electric vehicles and other vehicles from China and the issuance of import permits (DS629).¹

Turkey is imposing additional duties of 40% on imports of Chinese electric vehicles and 40–50% on imports of other types of vehicles from China, which is higher than Turkey’s bound level. These measures do not apply to imports of electric vehicles from other countries. Imports of electric vehicles and other types of vehicles originating in the EU and member countries with which Turkey has a free trade agreement are exempt from the requirement to obtain an import permit certificate.

China considers the import permit certificate scheme to be restrictive and discriminatory. It considers that the Turkish measures violate:

— Article I:1 (“General Most-Favored-Nation Treatment”) of GATT 1994, as Turkey does not immediately and unconditionally grant Chinese goods the same advantages as similar goods originating in other member countries.

— Article II:1 (“Schedule of Concessions”) of GATT 1994, as Turkey accords Chinese electric vehicles and other vehicles treatment less favorable than that provided for in its Schedule and imposes duties above the bound level.

— Article XI:1 (“General Elimination of Quantitative Restrictions”) of GATT 1994, as the import license certificate scheme constitutes a prohibition or restriction other than duties, taxes, or other charges on imports from China.

— Article III:4 (“National Treatment of Internal Taxation and Regulation”) of GATT 1994, as the basic requirements that must be met to obtain an import license certificate do not provide electric vehicles and other vehicles from China with treatment no less favorable than that accorded to like products of national origin.

— Article X:3(a) (“Publication and Application of Trade Rules”) of GATT 1994, as Turkey does not apply its import license certification scheme uniformly.

— Article 2.1 (“National Treatment and Quantitative Restrictions”) TRIMs Agreement, as the import license certification scheme is an investment measure related to trade in goods.

On January 16, 2025, China submitted a request to establish a TG, which was established on February 24, 2025, and its participants were selected on April 22, 2025.

Russia is interested in environmental issues, in particular the production of electric vehicles. Russia is involved in a large number of disputes over the introduction of additional import duties, taxes, and fees in violation of WTO rules and regulations. Although such measures were mainly introduced against other countries and not as sanctions, participation in such disputes is useful for Russia in developing a counter-sanctions policy.

1. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds629_e.htm

DS630: EU—Final countervailing duties on new electric vehicles with batteries from China (China)

On November 4, 2024, China submitted a request to the DSB for consultations on EU countervailing duties and an investigation into Chinese new electric vehicles with rechargeable batteries (DS630).¹ According to the complainant, the EU failed to conduct good-faith consultations prior to initiating the investigation and did not provide access to information, in violation of Article 13 (“Consultations”) of the Agreement on Subsidies and Countervailing Measures. The EU did not provide sufficient evidence of the existence of subsidies, material injury or threat thereof, and causation to justify the initiation of the investigation, contrary to Article 11 (“Initiation and Subsequent Investigation”) of the Agreement on Subsidies and Countervailing Measures. The EU did not notify all interested parties of the information required from them and did not collect this information from the parties, which is contrary to Article 10 (“Application of Article VI of GATT 1994”) and Article 12 (“Evidence”) of the Agreement on Subsidies and Countervailing Measures.

The EU failed to establish that the alleged preferential financing was specific to an enterprise, industry, or group of enterprises and industries, and failed to substantiate specificity on the basis of positive evidence, in violation of Article 2 (“Specificity”) of the Agreement on Subsidies and Countervailing Measures. The EU incorrectly determined that the alleged supply of batteries was specific, which is inconsistent with Article 1.2 (“Definition of a subsidy”) and Article 2 of the Agreement on Subsidies and Countervailing Measures, failed to substantiate the determination of specificity based on positive evidence, failed to identify the existence of a subsidy program, and failed to identify that battery suppliers acted as government entities. The EU erred in finding that domestic Chinese battery prices are not market prices under Article 14 (“Calculation of the subsidy amount as a benefit to the recipient”) of the Agreement on Subsidies and Countervailing Measures and are not an appropriate benchmark for assessing the adequacy of remuneration. The EU’s introduction of countervailing measures to counter fiscal subsidy policies is contrary to Article 19 (“Imposition and collection of countervailing duties”) and Article 21.1 (“Duration and review of countervailing duties and undertakings”) of the Agreement on Subsidies and Countervailing Measures, as well as Article VI:3 (“Anti-Dumping and Countervailing Duties”) of GATT 1994, since the alleged subsidy ceased to exist at the beginning of the investigation.

The EU incorrectly determined that the revenue foregone as a result of the alleged tax exemption and reduction programs, including the reduction of corporate income tax for high and new technology enterprises, the preferential deduction of R&D expenses before taxation, the exemption of dividends between qualified resident enterprises, deduction of income from technology transfer, and exemption from consumption tax on rechargeable batteries, resulted in financing or constitut-

1. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds630_e.htm

ed an export subsidy within the meaning of Article 3.1 (“Prohibition”) of the Agreement on Subsidies and Countervailing Measures.

On March 13, 2025, China submitted a request to establish a TG, which was established on April 25, 2025, and its members were selected on October 13, 2025. On July 31, 2025, China and the EU announced that they had agreed on the arbitration procedure in accordance with Article 25 (“Arbitration”) of the DPRS. The procedures were initiated by the parties to implement the MPIA.

Russia’s interest stems from the fact that Canada is an unfriendly country that has imposed sanctions against Russia, including the cancellation of the RBN and an increase in customs duties. Russia is interested in examples of challenging the introduction of additional duties in circumvention of the WTO, including in emergency situations, on the grounds of national security.

DS636: China—Additional import duties on certain agricultural and fishery products from Canada (Canada)

On March 20, 2025, Canada submitted a request to the DSB for consultations with China regarding the imposition of import duties of 100% on certain types of rapeseed oil, rapeseed meal, and peas, and 25% on pork and certain types of seafood from Canada (DS636).¹ These import tariffs were levied in addition to any duties imposed by China in accordance with its tariff commitments. In Canada’s view, China’s investigation of discrimination and subsequent imposition of countermeasures against Canadian products are unilateral actions that violate the dispute settlement rules of the TRIMs Agreement for obtaining redress for alleged violations of covered agreements. China’s actions have deprived Canada of due process and the right to defend itself against any alleged inconsistencies with the covered agreements. China’s unilateral actions have deprived all WTO members of any role in the dispute settlement process and the DSB of its most important function of facilitating the satisfactory resolution of disputes. Canada considers that China has violated:

— Article I:1 (“General Most-Favored-Nation Treatment”) of GATT 1994, because China applied additional import duties on certain agricultural and fishery products produced in Canada that were not levied on products produced by other WTO members, by failing to extend immediately to Canada the benefits granted by China with respect to duties levied on imports of products produced in other member countries.

— Article II:1 (“Schedule of Concessions”) of GATT 1994, as the measures in question do not accord Canada’s trade treatment no less favorable than that provided for in China’s Schedule of Concessions annexed to GATT 1994. Chinese duties on agricultural and fishery products exceed the bound level.

1. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds636_e.htm

On May 23, 2025, Canada submitted a revised request to the DSB for the establishment of a TG, which was established a month later. On August 20, 2025, Canada and China informed the DSB that they had agreed to arbitration procedures under Article 25 (Arbitration) of the DSU under the MPIA in this dispute in order to provide a basis for the arbitrators to make a decision if the AB is unable to consider the appeal.

Russia is interested in examples of challenging the imposition of additional duties in circumvention of the WTO, including in emergency situations, on national security grounds. Joining such disputes as a third party, when the respondent is a friendly country against which an unfriendly country has previously imposed unlawful restrictive measures, may be relevant for Russia in light of the development of a counter-sanctions policy.

Below we will examine the changes in 2025 in the situation regarding WTO disputes to which Russia joined as a third party before 2025 (based on 10 unique disputes, i.e., different measures taken by WTO member countries).

DS536: United States—Anti-dumping measures on fish fillets from Vietnam (Vietnam)

On January 8, 2018, Vietnam submitted a request to the DSB for consultations with the US regarding anti-dumping measures on fish fillets from Vietnam and other US legal instruments (DS536).¹ In particular, the following were challenged:

— The US methodology for determining dumping margins in anti-dumping investigations (zeroing), which the AO considered to be in violation of the US's international obligations. When comparing the export price and normal value based on average values, the US did not allow the margin above normal value for non-dumped sales to offset the dumping margin for sales below normal value. The dumping margin determined by the US exceeds the actual dumping.

— The requirement to file a separate application for a rate or certification during investigations and periodic reviews involving Vietnamese producers in order to obtain a separate, rather than a nationwide, rate.

— Application of a Vietnam-wide tax rate based on adverse facts available to respondents who were not individually investigated and who did not submit a separate application for a rate or confirmation of the absence of state control.

— The practice of applying unfavorable AD rulings, as a result of which outstanding positions, whether introduced or withdrawn from the warehouse for consumption, continue to be subject to duty assessment in accordance with the original determination of the anti-dumping duty or at a rate exceeding the agreed WTO rate.

Vietnam considers that the United States is in violation of the Anti-Dumping Agreement, GATT 1994, and the Agreement Establishing the WTO (Marra-kesh Agreement). There are numerous AD and TD rulings in which the US zeroing practice has been found to be inconsistent with WTO rules, both as a matter

1. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds536_e.htm

of law (DS429)¹ and as applied (DS404).² The US assigns a Vietnam-wide rate to companies that do not receive an individual rate, based solely on the negative facts available, even in cases where companies responded to US questionnaires in a timely and complete manner. The result is the assignment of unreasonable rates to companies that are doing their utmost to comply with the requirements.

The TG worked from November 30, 2018, and submitted its report on February 5, 2025. On January 17, 2025, the parties notified that, in accordance with Article 3.6 (“General Provisions”) of the DSRP, they had reached a mutually agreed solution to the dispute, and the TG completed its work.

Russia is interested in participating in disputes over US safeguard measures, as at the end of 2025, there were 10 anti-dumping, 6 countervailing, and 3 special safeguard measures in force against Russia by the US. Russia is the respondent in a dispute over US anti-dumping measures (DS586).³

DS577: United States — Anti-dumping and countervailing duties on ripe olives from Spain (EU)

On January 29, 2019, the EU submitted a request to the DSB for consultations with the US regarding countervailing and anti-dumping duties on ripe olives from Spain and the legislation on the basis of which they were imposed (DS577).⁴ In March 2024, the Compliance Body upheld the EU’s claim that the respondent had failed to bring its measures into conformity with WTO rules and regulations. On November 14, 2024, the EU requested the DSB’s authorization to suspend the application of concessions or other obligations under the covered agreements to the US in accordance with Article 22.6 (“Compensation and Suspension of Concessions”) of the DSU. The EU announced its intention to suspend payments of approximately \$35 mn annually, subject to adjustment for inflation. The EU stated that the proposed annual level of suspension is equivalent to the level of trade consequences for the EU due to the US’s failure to bring the measure in question into conformity with the recommendations and rulings of the DSB.

On November 22, 2024, the US indicated that, in accordance with Article 22.6 (“Compensation and Suspension of Concessions”) of the DSU, it objects to the levels of suspension of concessions or other obligations proposed by the EU. On October 29, 2025, the arbitrators’ decision was sent to the participants. The arbitrators chose the Armington partial equilibrium model, which provides predictable suspension levels, takes into account different forms of supply and demand, and is versatile enough to cover a variety of products.

1. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds429_e.htm

2. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds404_e.htm

3. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds586_e.htm

4. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds577_e.htm

The EU may apply a forward-looking model to quantify the value of lost imports due to the use of WTO-inconsistent short-term differential prices (STDs) underlying this event. The forward-looking model is designed to be applied in a single stage only. Two simulations are considered, which use actual sales data from the base year as input and differ only in the scenarios modeled:

- 1) Scenario A: scenario of introducing TDPs that are not compatible with WTO rules.
- 2) Scenario B: scenario of introducing TDPs that are compatible with WTO rules.

The model includes adjustments proposed by the US regarding the inclusion of domestic sales and the exclusion of third markets. The application of the forward-looking model requires certain values for a number of parameters: Armington's substitution elasticity, price elasticities of demand, domestic and export supply.

The arbitrators determined that the amount of unpaid benefits received by the EU as a result of the US countervailing investigation into ripe olives from Spain is \$13.64 mn. The EU may request the DSB to authorize the suspension of benefits or other obligations in an amount not exceeding \$13.64 mn per year. This amount may be adjusted for inflation in 2024 and annually thereafter, as well as for changes in duty rates. On November 13, 2025, the EU submitted a request to the DSB to suspend concessions and other obligations in relation to the US at a level of up to \$13.64 mn.

Russia's interest in this dispute can be explained by the fact that it filed a complaint against the US regarding anti-dumping measures (DS586).¹ Russia often joins disputes over countervailing measures and subsidies, as there are a large number of protective measures in place against it that negatively affect Russian exports.²

DS591: Colombia – Anti-dumping duties on frozen French fries from Belgium, Germany, and the Netherlands (EU)

On November 15, 2019, the EU requested consultations with Colombia regarding anti-dumping duties on imports of prepared or preserved potatoes (without the use of vinegar or acetic acid), frozen (frozen French fries) from Belgium, the Netherlands, and Germany (DS591).³

On October 23, 2025, the TG submitted its compliance report, which the DSB adopted on November 24, 2025. This proceeding concerned the EU's challenge to Colombia's implementation of the arbitrators' decision under Article 25 ("Arbitration") of the DSRP and MPIA. The EU raised claims regarding how Colombia calculated the duty amount. The EU demonstrated that when Colombia decided to apply

1. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds586_e.htm

2. URL: <https://www.iep.ru/ru/publikacii/publication/rossiyskaya-ekonomika-v-2023-godu-tendentsii-i-perspektivy-vypusk-45.html>

3. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds591_e.htm

the weighted average comparison methodology provided for in Article 2.4.2 (“Determination of Dumping”) of the Anti-Dumping Agreement, the comparison should have used weighted average normal values, rather than simple average normal values, to address the lack of precisely matching domestic sales.

The TG recommended that Colombia bring its measures into conformity with its obligations under the Anti-Dumping Agreement, agreeing that the EU had shown that Colombia had imposed duties in excess of the dumping margin, contrary to Article 9.3 (“Imposition and collection of anti-dumping duties”) of the Anti-Dumping Agreement, but had not demonstrated that the comparisons made on the basis of product items rather than broader product groups were unfair, in accordance with Article 2 (“Determination of Dumping”) of the Anti-Dumping Agreement.

Disputes over safeguard measures are important to Russia both in terms of its substantial trade interest and its practice of participating in and studying the application of WTO rules and provisions, as there are many safeguard measures in place against Russia that have a significant negative impact on its exports. The procedure for replacing data from exporters subject to anti-dumping investigations with data from producers in third countries has been challenged by Russia in a number of disputes (against the EU—DS474, DS494, DS521, against Ukraine—DS493, against the US—DS586).¹

DS593: EU—Certain measures concerning palm oil and palm oil-based biofuels (Indonesia)

On December 9, 2019, Indonesia submitted a request to the DSB for consultations with the EU regarding measures on palm oil and biofuels derived from oil palms from Indonesia (DS593).² On January 10, 2025, the TG report was submitted, agreeing with the complainant that the EU had violated:

—Article 2 (“Preparation, adoption, and application of technical regulations by central government authorities”) the TBT Agreement by introducing high ILUC risk restrictions³ and phase-outs without analyzing the data used to determine which biofuels are high risk and which are low risk, resulting in unjustified discrimination between countries with similar conditions. The EU also failed to notify the proposed 7% cap and high ILUC risk restriction, ensuring that comments could be provided.

—Article 5 (“Conformity assessment procedures by central government bodies”) TBT Agreement, as shortcomings in the implementation of the low ILUC risk certification procedure created unnecessary barriers to international trade. The EU did

1. URL: <https://www.iep.ru/ru/publikacii/publication/rossiyskaya-ekonomika-v-2023-godu-tendentsii-perspektivy-vypusk-45.html>

2. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds593_e.htm

3. Due to the growth in global demand for biofuels for the production of ethanol or biodiesel, agricultural land is expanding. As a result, virgin land is being cleared for new farms, leading to an increase in greenhouse gas emissions.

not publish a notification on low ILUC risk certification at an early stage for interested parties.

— Article III:4 (“National treatment for internal taxation and regulation”) of GATT 1994, as the EU granted less favorable treatment to palm oil-based biofuels from Indonesia than to similar products of European origin.

— Article I:1 (“General Most-Favored-Nation Treatment”) of GATT 1994, as the EU did not grant palm oil biofuels from Indonesia the advantages granted to similar products from third countries.

— Article XX (“General Exceptions”) of GATT 1994: the high ILUC risk restriction and phase-out were a measure relating to the conservation of exhaustible natural resources, which came into force in conjunction with restrictions on domestic consumption or production; limiting high ILUC risk and phasing it out was a measure necessary to protect human, animal, or plant life or health; restricting high ILUC risk and phasing it out were applied in a way that constituted unjustified discrimination between countries with similar conditions, as the EU had not analyzed data on which biofuels were associated with high ILUC risk, because there were shortcomings in the development of low ILUC risk criteria and the certification procedure.

Similarly, the TG considered the French measure on palm oil biodiesel. On March 24, 2025, the EU announced that it intended to comply with the DSB’s recommendations to bring the measures into line with its WTO obligations, which would require a reasonable period of time. On July 7, 2025, under Article 21.3 (“Monitoring of the implementation of recommendations and rulings”) of the DSU, the parties agreed that a reasonable period for the EU to implement the recommendations would be 12 months, i. e., expiring on February 24, 2026.

In February 2018, Indonesia already won a dispute with the EU over anti-dumping measures on biodiesel (DS480), to which Russia also joined as a third party. Russia’s interest in participating in these disputes is due, among other things, to the priority it gives to the development of renewable energy sources in the country and worldwide.¹

DS599: Panama — Measures concerning imports of certain goods from Costa Rica (Costa Rica)

On January 11, 2021, Costa Rica submitted a request to the DSB for consultations with Panama regarding measures related to the importation of a number of goods from Costa Rica, including strawberries, dairy products, beef, pork, poultry and turkey, fish feed, fresh pineapples, bananas and plantains (DS599).² On December 5, 2024, a report was submitted in which the TG upheld almost all of the claimant’s claims. However, the TG did not agree with Costa Rica that the ban on imports of dai-

1. URL: <https://www.iep.ru/ru/publikacii/publication/rossiyskaya-ekonomika-v-2020-godu-tendentsii-i-perspektivy-vypusk-42.html>

2. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds599_e.htm

ry and meat products from 16 establishments constituted a disguised restriction on international trade. On January 24, 2025, Panama notified the DSB of its decision to challenge certain issues of law and legal interpretation in the TG report and its intention to file an appeal when the AB resumes its work. Costa Rica noted that it did not agree with all of Panama's assertions regarding the illegality of the TG report.

Russia is interested in disputes over import restrictions and bans. In accordance with the tasks set, Russia plans to increase exports of agricultural products and food by 1.5 times compared to 2021 (up to \$55 billion) by 2030, which explains Russia's significant trade interest in participating in the dispute.¹

DS603: Australia — Anti-dumping and countervailing duties on certain goods from China (China)

On June 24, 2024, China requested consultations with Australia regarding Australian anti-dumping and countervailing measures on imports of certain Chinese-made goods, specifically wind turbines, deep-drawn stainless steel sinks, and railway wheels (DS603).²

On March 26, 2024, the TG submitted a report with recommendations to the respondent to bring the measures into conformity with WTO rules and regulations. On January 16, 2025, Australia notified the DSB pursuant to Article 21.6 ("Monitoring of Recommendations and Rulings") of the DSU that it had complied with the recommendations and rulings in this dispute. Australia reported that the anti-dumping measures on wind turbine towers from China expired on April 16, 2024. The anti-dumping duties (13.3%) applied to railway wheels from China remain in effect while the investigation is ongoing. The notification of anti-dumping measures on Chinese shells was withdrawn for all exporters as of June 25, 2024. These adjustments were made following investigations and reviews conducted by the Australian Anti-Dumping Commission.

Russia's interest is primarily due to its involvement in disputes over anti-dumping and countervailing measures and investigations, and the application of subsidies, as the issue of non-market economies is becoming increasingly relevant not only for China but also for Russia (disputes over energy adjustments with the EU, the US withdrawal of market status for the Russian economy).

DS610: China — Measures affecting trade in goods and services (EU)

On January 27, 2022, the EU submitted a request to the DSB for consultations with China regarding measures affecting trade in goods and services between China and Lithuania.³ In 2021, importers of Lithuanian goods and goods transiting through

1. URL: <https://www.interfax.ru/russia/961021>

2. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds603_e.htm

3. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds610_e.htm

Lithuania began to encounter customs clearance restrictions for the import of goods into the PRC (in particular, errors in IT systems; blocking of containers in Chinese ports; inability of Chinese customs authorities to process customs clearance requests in a timely manner). Since 2021, Chinese customs authorities have begun to refuse customs clearance for shipments of various goods covered by SPS certificates issued by the Lithuanian authorities. According to the EU, China is discriminating in its application of SPS measures, which constitute a disguised restriction on international trade. On July 4, 2023, the EU and China agreed on arbitration procedures in accordance with Article 25 (“Arbitration”) of the DPRS for the entry into force of the MPIA. The TG has been working since April 18, 2023.

On November 28, 2025, the EU announced that, since the main objectives of the dispute had been achieved and the relevant trade had resumed, it was terminating the dispute settlement procedure.

Russia’s interest here stems from its practice of participating in disputes over SPS measures. Russia had to bring its measures into line with WTO rules and regulations in the EU dispute over SPS measures on live pigs, pork and pork products from the EU (DS475).¹ Russia participated as a respondent in a dispute initiated by Ukraine concerning measures restricting the import and transit of a number of Ukrainian goods (DS532),² and as a complainant in a dispute against Ukraine concerning measures restricting trade in goods and services, as well as transit (DS525).³

DS611: China—Protection of intellectual property rights (EU)

On February 18, 2022, the EU submitted a request to the DSB for consultations with China on measures that negatively affect the protection of intellectual property rights.⁴ If a technical standard requires the use of a patented product or process, the manufacturer will need to obtain a license to use it, otherwise it risks infringing the rights of the patent owners and facing legal consequences. The owner undertakes to grant a license for the patented object to the developers of the standard on non-discriminatory terms. Legal disputes may arise between patent holders and implementers as to whether the royalty rate paid by the implementer to the patent holder is fair.

Several developer companies have filed lawsuits in China demanding that Chinese courts set the licensing rate for certain patents necessary for mobile communications and issue an injunction prohibiting the other party from taking legal action in other jurisdictions. The EU challenged five court decisions granting injunctions, as well as the alleged policy of such claims in relation to standard patent litigation.

1. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds475_e.htm

2. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds532_e.htm

3. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds525_e.htm

4. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds611_e.htm

These measures are contrary to the TRIPS Agreement, in particular the transparency obligations.

On July 4, 2023, the EU and China informed the DSB that they had agreed on arbitration procedures in accordance with Article 25 (“Arbitration”) of the DSU under the MPIA. In April 2025, the TG report was submitted. On April 28, 2025, China filed an appeal under Article 25 (“Arbitration”) of the DSRP. On May 2, 2025, arbitrators were selected, and on July 21, 2025, the arbitrators issued their final decision, supporting the TG in that:

— The EU had not proven that the intellectual property policy was inconsistent with Article 44.1 (“Injunctions”) and Article 1.1 (“Nature and Scope of Obligations”) of TRIPS.

— The EU had demonstrated the existence of a policy on anti-competitive measures that was a rule of general application under Article 63.1 (“Transparency”) of TRIPS.

In the opinion of the arbitrators, the TG made a number of errors. The EU demonstrated that the requirements for issuing an injunction are not consistent with Article 28.1 (“Rights Granted”) and Article 1.1 (“Nature and Scope of Obligations”) of TRIPS. August 20, 2025 China announced its intention to bring its measures into line with WTO rules and regulations.

Russia’s interest in participating in disputes over the protection of intellectual property rights is due to its practice of participating in such disputes and studying the application of TRIPS. Russia has joined nine WTO trade disputes concerning TRIPS violations.

DS616: EC — Countervailing and anti-dumping duties on cold-rolled flat stainless steel products from Indonesia (Indonesia)

On January 24, 2023, Indonesia submitted a request to the DSB for consultations with the EU regarding the countervailing and anti-dumping measures imposed by the EU on Indonesian cold-rolled stainless steel flat products (DS616).¹ Indonesia challenged certain EU dumping findings regarding the fair comparison of the export price with the normal value and price comparability. A report was submitted on October 2, 2025. The TG agreed with the complainant that the EU had violated:

— Article 1.1 (“Definition of Subsidy”) of the Agreement on Subsidies and Countervailing Measures by attributing to the Indonesian government the financing provided by Chinese grantors to producers in Indonesia; concluding that all nickel ore mining companies in Indonesia are state-owned; - determining that the Indonesian Ministry of Mining had instructed ore mining companies, as private entities, to supply ore to Indonesian stainless steel producers; considering the exemption from import duties on raw materials imported into customs zones to be financial contributions and subsidies;

1. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds616_e.htm

— Articles 1.2 and 2.1 (“Specificity”) of the Agreement on Subsidies and Countervailing Measures, without providing the necessary evidence that the tax incentive system is specific;

— Article 12.7 (“Evidence”) of the Agreement on Subsidies and Countervailing Measures, in deciding on the facts, given that the company did not provide information on equipment imported from its parent companies in China.

The TG rejected a number of Indonesia’s claims. Indonesia failed to prove that the EU’s decision on the specificity of the income tax exemption was contrary to Articles 1.2 and 2. Indonesia failed to prove that, by not designating nickel ore mining companies as interested parties, the EU had violated Article 12.9. With regard to the EU’s anti-dumping measures, the TRb did not support the complainant, since, in particular, Indonesia had not established that the EU had violated its obligation to make a comparison at the same level of trade in accordance with Article 2.4 (“Establishment of the fact of dumping”) the Anti-Dumping Agreement and Article VI:1 (“Anti-Dumping and Countervailing Duties”) of GATT 1994, by rejecting adjustments to the normal value to take account of transport costs between the parties’ warehouses. The EU did not specify what information was necessary for a fair comparison, contrary to Articles 2.4 and 6.1 (“Evidence”) of the Anti-Dumping Agreement.

On November 21, 2025, the EU appealed certain legal issues and legal interpretations contained in the TG report. On November 27, 2025, Indonesia filed a counter-appeal.

Russia’s interest in participating in this dispute is due to the fact that a significant number of anti-dumping, countervailing, and special safeguard measures (by the US, EU, and Ukraine) are in place against Russian exporters, primarily in the metallurgical and chemical industries. The measures are reaching prohibitive levels. In the EU, anti-dumping duties will apply to Russian corrosion-resistant steel until 2027:¹ 31.3% for Severstal, 36.6% for MMK, 14.85% for NLMK, and 37.4% for others.

Five of the eight WTO disputes initiated by Russia, and one in which Russia is the defendant, are related to anti-dumping measures.

DS618: EU — Countervailing duties on imports of biodiesel fuel from Indonesia (Indonesia)

On August 11, 2023, Indonesia submitted a request to the DSB for consultations with the EU regarding countervailing duties on imports of biodiesel from Indonesia and an investigation (DS618).² The complainant’s main claim concerned the EU’s

1. URL: https://www.economy.gov.ru/material/directions/vneshneekonomicheskaya_deyatelnost/dostup_na_vneshnie_rynki_i_zashchitnye_mery/reestr_ogranich_mer/

2. URL: https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds618_e.htm

determination that Indonesia maintains certain subsidy programs for such imports and that these cause material injury to biodiesel producers in the EU. Indonesia also challenged procedural issues in the countervailing investigation. On August 22, 2025, the report was submitted. The TG upheld the complainant's claim that the EU had violated:

— Article 1.1 (“Definition of subsidy”) the Subsidies and Countervailing Measures Agreement by establishing that, through measures such as export taxes and duties, the Indonesian government, acting as a price regulator, encouraged local producers to sell crude palm oil on the domestic market to biodiesel producers in Indonesia for remuneration that did not correspond to its quality;

— Article 12.7 (“Evidence”) of the Agreement on Subsidies and Countervailing Measures, by resorting to available facts concerning independent suppliers of palm oil on the grounds that Indonesia failed to provide the suppliers' responses;

— Article 15 (“Determination of Injury”) of the Agreement on Subsidies and Countervailing Measures, by failing to conduct an objective investigation based on positive evidence of the impact of Indonesian imports on the prices of similar domestically produced goods and establishing a significant price decline; by failing to conduct an objective study of the factors affecting the state of the domestic industry, etc.

The TG did not support Indonesia, in particular, that the EU violated:

— Article 12.7 (“Evidence”) by referring to information provided by independent suppliers when concluding whether the state-owned enterprise had lowered its prices in Indonesia;

— Article 15 (“Determination of Injury”) by failing to ensure price comparability when examining the impact of Indonesian imports on the prices of similar domestic products and by failing to take into account the existence of a significant overall price decline;

— Article 12 by failing to require EU producers to provide a non-confidential summary of the information; by failing to provide interested parties with information, including for the purpose of proposing alternative methodologies for calculating price declines; by providing untimely disclosure of information, inter alia, on elasticity in the EU market.

The TG recommended that the EU bring its measures into conformity with its obligations under the Agreement on Subsidies and Countervailing Measures. On September 26, 2025, the EU notified the DSB of its decision to appeal certain points of law and legal interpretations in the TG report.

Russia's interest in participating in the dispute is due not only to the practice of disputes over safeguard measures, but also to the fact that Russia is significantly affected by anti-dumping measures and investigations.

At the end of 2025, there were 11 anti-dumping measures in force against Russian exporters by the EU, mainly concerning goods in the metallurgical and chemical

industries, and one anti-dumping investigation was underway.¹ In addition, Russia is interested in the topic of renewable energy sources.

* * *

Russia adheres to WTO rules and regulations and considers it to be the main and only regulator of international trade, highlighting the following key issues:^{2, 3, 4}

- 1) The stability and predictability of international trade, which play a greater role than tariffs. The WTO must remain manageable and relevant.
- 2) Countering unilateral protectionist measures.
- 3) Restoring the dispute settlement system.
- 4) Improving the effectiveness of the WTO in achieving national development goals.
- 5) Developing WTO rules in the field of AI and digital technologies.
- 6) Actively participating in discussions on WTO reforms that are possible without the US.
- 7) Russia's withdrawal from the WTO would mean giving up more favorable market access conditions for many of Russia's trading partners.

Russia is interested in preserving the multilateral format of negotiations, complying with WTO obligations, restoring the full functioning of the DSB, and implementing Russia's tasks in ongoing disputes involving it, as well as in other controversial trade practices. It is extremely important for Russia to participate in negotiations on new international trade rules that respond to contemporary challenges, particularly in the areas of digital technologies and AI, sanctions, the definition of emergency situations, general exceptions and national security exceptions,⁵ etc.

1. URL: https://www.economy.gov.ru/material/directions/vneshneekonomicheskaya_deyatelnost/dostup_na_vneshnie_rynki_i_zashchitnye_mery/reestr_ogranich_mer/

2. URL: <https://wto.ru/news/mozhno-li-reanimirovat-vto/>

3. URL: <https://wto.ru/our-blog/budushchaya-mnogostoronnyaya-torgovaya-sistema-nam-po-puti-da-net/>

4. URL: <https://wto.ru/our-blog/obshchestvennyy-forum-vto-2025/>

5. URL: http://www.vavt-imef.ru/wp-content/uploads/2022/07/Monitoring_82.pdf