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# **A CONVERSATION WITH WORLD TRADE ORGANIZATION**

**MARKET ACCESS DIVISION ON ITS  
PUBLICATION “INTERNATIONAL  
EXPORT REGULATIONS AND  
CONTROLS – NAVIGATING THE  
GLOBAL FRAMEWORK BEYOND WTO  
RULES”**

**SEPTEMBER 2025**

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## Prepared by the ACSS Export Controls Taskforce

<https://sanctionsassociation.org/acss-export-controls-task-force-2/>

## Introduction

The World Trade Organization (WTO), which was established in 1995, is an international organization that regulates global trade. It provides a framework for negotiating and enforcing trade agreements and a platform for resolving trade disputes between members.

As referenced in the ACSS CXS qualification, the **WTO publication on *International export regulations and controls – navigating the global framework beyond WTO rules*** was published in autumn 2023.

## Summary of the Publication

In the Weapons and Disarmament part of this WTO publication, it features a chapter contributed by the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies.

This part also includes chapters on United Nations Security Council resolutions and export controls, the Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and their Destruction, the Arms Trade Treaty, and the Australia Group.

The publication is however much broader and also provides analysis on environmental protection and drugs control, with contributions from relevant secretariats and bodies involved in the implementation of international agreements and conventions.

## The Review and the ACSS Export Controls Taskforce Conversation with the WTO Secretariat

The review goes into detail on some of the international agreements and measures under those agreements used to regulate and restrict the export of high-risk, sensitive and controlled goods and how these interact with WTO rules.

The review was coordinated by the WTO Secretariat (Market Access Division). Through a brief conversation with some of these coordinators, the ACSS Export Controls Task Force was able to better understand the goals and outcomes of this publication.

## Quantitative Restrictions

The conversation started by discussing the impact of Article XI of the General Agreement on Tariffs and Trade (GATT) 1994, which prohibits import and export quantitative restrictions, known as QRs.

This aims to ensure that, beyond tariffs, taxes, or other charges, there are no restrictions on trade between WTO members.

However, as was explained by the coordinators, there are some exceptions to this rule.

The two main exceptions are Article XX and XXI of the GATT 1994.

- Article XX of the GATT 1994 provides for 'general exceptions', for example to protect the environment or health, and
- Article XXI details measures to protect national security, called the 'security exceptions'.

The coordinators further described how extensive international cooperation has taken place to generally avoid restrictive measures. However, to ensure legitimate trade objectives are achieved and to avoid the risk of high-risk, sensitive or controlled products goods falling into the wrong hands, QRs may be permitted as an exception, and these restrictions require notification to the WTO.

## Mapping the Control Frameworks

The publication under discussion was created to map some of these control frameworks created through international cooperation, to better understand the exceptions in place and exactly how these co-exist with WTO rules and requirements.

The coordinators detailed how there is often overlap among these international frameworks including on the covered products and/or tools used in different areas: for example, chemicals are heavily regulated across environmental protection frameworks but also in weapons and disarmament agreements.

The starting point for the review was an analysis of the WTO Quantitative Restrictions database (QR.wto.org), where members notify the WTO on import and export bans and prohibitions. The coordinators then dived deeper into the data to locate and identify the controls from international agreements and conventions and the measures members rely on in those QRs.

The coordinators were keen to stress that the publication focuses on all QRs in place in relation to trade measures, and export controls are only a subset of those restrictions.

Indeed, traditionally these international agreements focused only on import regulations for controlled and sensitive goods.

During our conversation, they detailed how the publication focuses on understanding the direct and indirect application of trade international agreements and conventions within the multilateral system.

## Breaking Down Siloes

The focus, in relation to export controls, was to identify commonalities in different areas of the world, to better understand how international cooperation has led to at least some degree of harmonization globally in key areas.

As the review continued, the coordinators described how, in the process of breaking down the silos between the different QRs in place, they were able to better understand how the approaches and tools used in different international agreements were replicated and overlapped to at least some extent.

As the discussion progressed, the coordinators considered the future of cooperation for agreements on restrictions outside the WTO framework.

As many are aware, the trend now appears to indicate a movement towards a more unilateral approach at a national level, rather than through the multilateral cooperation previously seen.

At the same time, there are certain problems that can only be solved effectively through international cooperation.

## Conclusion

The conversation concluded with all agreeing that it will be very interesting and important to see how this develops over the following years and if further progress can really be made with significantly less collaboration at an international level.

The publication text is available at the link below for further review by ACSS members:  
[https://www.wto.org/english/res\\_e/publications\\_e/international\\_exp\\_regs\\_e.htm](https://www.wto.org/english/res_e/publications_e/international_exp_regs_e.htm)

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