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The EU's new framework for steel imports: the “*melt and pour*” traceability requirement applies since 1 October 2026

By Florette Peter, Madalina Stoican, and Tobias Dolle

Since 1 October 2026, EU importers of steel products must be able to identify and provide evidence of the country of “*melt and pour*”, which refers to the country where the “*raw steel or iron was initially produced in liquid form*” and “*subsequently cast into its first solid state*”. This traceability requirement was introduced by *Regulation (EU) 2026/1384 of the European Parliament and of the Council of 17 June 2026 addressing the negative trade-related effects of global overcapacity on the Union steel market and amending Regulation (EU) 2020/2170* (hereinafter, EU Steel Regulation) in order to increase transparency and help prevent the circumvention of the EU's new tariff-rate quotas (hereinafter, TRQs) applicable to steel imports.

This article reviews the measures implementing the *EU Steel Regulation*, focusing on the traceability requirements, their implications for EU importers and trading partners, and the compatibility of the new regime with the rules of the *World Trade Organization* (hereinafter, WTO).

From temporary safeguard to structural steel import regime

On 31 January 2019, the European Commission (hereinafter, Commission) had adopted *definitive safeguard measures* on certain steel imports to “*prevent economic damage for EU steel producers, given the risk of further import increases linked, inter alia, to the introduction of trade restrictions by the United States on steel products*”. The safeguard established annual quotas for 26 categories of steel products and imposed a 25% duty on imports exceeding those quotas. As safeguard measures are temporary in nature, they expired on 30 June 2026, following two extensions.

On 19 March 2025, the Commission published its *Steel and Metals Action Plan*, which warned that global overcapacity and its trade effects would not disappear when the EU's steel safeguard was scheduled to expire. In that context, the Commission introduced the new *Steel Regulation*, which applies since 1 July 2026 and establishes a permanent framework for addressing global steel overcapacity, marking an important shift from a temporary trade-defence instrument addressing an import surge to a structural commercial policy intended to protect the EU steel sector in the longer term.

The *EU Steel Regulation* provides for annual tariff-rate quotas (hereinafter, TRQs) covering 26 product categories, with an aggregate duty-free volume of 18,345,922 metric tonnes, corresponding to roughly 42% of EU's total 2025 steel import volumes. Imports exceeding the applicable quota are subject to a 50% *ad valorem* duty. *Commission Implementing Regulation (EU) 2026/1457 of 29 June 2026 on the distribution of tariff quotas opened under Regulation (EU) 2026/1384 of the European Parliament and of the Council addressing the negative trade-related effects of global overcapacity on the Union steel market and amending Regulation (EU) 2020/2170* gives practical effect to the country-allocation mechanism.

Allocations are determined on the basis of several factors, including past trade performance, with 2013 serving as reference year, import patterns over the 2022 to 2024 period for product-level tariff quotas, and the existence or prospective conclusion of preferential trade agreements with exporting countries. The allocation methodology also takes into account broader trade and policy considerations, such as third-country trade distortions, breaches of relevant *International Labour Organization* conventions and of multilateral environmental agreements, or the diversification of sources of supply. Within each country-specific quota, the actual allocation to importers is administered quarterly on a 'first-come first-served' basis.

New traceability requirement: The Country of “melt and pour”

Under Article 4 of the *EU Steel Regulation*, importers must provide, at importation, “verifiable appropriate evidence” to prove the country of “melt and pour”. In order to implement this requirement, the Commission adopted *Commission Implementing Regulation (EU) 2026/1963 of 28 August 2026 on determining the type of evidence to be provided by importers to prove the country of melt and pour*. The *Implementing Regulation* requires importers of covered steel products to submit, since 1 October 2026, a *Mill Test Certificate* (MTC), identifying both the country of “melt and pour” and the heat number, which refers to a unique identifier of a production batch.

Where the *Mill Test Certificate* does not provide the required information, certain specified documents, such as invoices, delivery notes, supplier declarations, or Customs or production documents, may supplement the certificate. For a transitional period of one year, namely from 1 October 2026 to 30 September 2027, these specified documents may be accepted as standalone evidence, provided that they establish both the country of “melt and pour” and the heat number. Failure to provide appropriate verifiable evidence of the country of “melt and pour” will lead to a rejection of the import.

The “melt and pour” requirement will have implications beyond traceability. From 1 October 2027, the Commission will “take into account the information gathered from importers on the country of ‘melt and pour’” when distributing quotas among countries and, by 30 June 2028, the Commission is tasked to “assess whether it is necessary to designate the country of ‘melt and pour’ as the basis for benefiting from tariff quotas provided for in this Regulation”. This suggests that the requirement could ultimately play a role in determining access to the TRQs.

Steel protection and WTO limits

The new EU steel regime raises a number of questions under the EU's compliance with its WTO commitments. Notably, WTO rules prescribe the way in which TRQs are to be allocated among supplying countries. Article XIII:2 of the GATT 1994 generally requires quota allocation to reflect, as closely as possible, the trade shares that exporting countries would have obtained in the absence of the restriction, typically assessed by reference to past trade patterns. By contrast, Article 5 of the *EU Steel Regulation* allows the European Commission to consider a broader range of factors when distributing the quotas between countries. WTO rules do allow certain “special factors” to justify departures from the historical shares, but it is less clear whether considerations such as supply diversification and labour or environmental compliance could fall within that concept. The EU's approach may, therefore, raise questions as to the consistency of the allocation methodology with Article XIII:2 of the GATT 1994.

Another potential issue concerns whether the mandatory *Mill Test Certificate* used to demonstrate the country of “*melt and pour*” falls within the scope of the [WTO Agreement on Import Licensing Procedures](#). Under Article 1.1 of that *Agreement*, an import licensing procedure exists where the importation of goods is made conditional on the submission of an application or other documentation to an administrative authority, other than documentation required for Customs purposes. Accordingly, whether the *Mill Test Certificate* can be considered an import licence depends on how it operates in practice, in particular whether it forms part of the ordinary Customs formalities or constitutes a separate condition prior to importation. If it is a separate condition, it must then be assessed whether approval follows automatically upon submission of the required documents, or it requires further review by the competent authority. In the latter case, the procedure would constitute non-automatic import licensing and is subject to Article 3, including the obligation that the administrative burden be limited to what is necessary to administer the measure.

A framework still in the making

Under Article 12 of the *EU Steel Regulation*, the Commission must conduct periodic reviews that may expand or adjust the scope of the TRQs. The first review, which is due by 31 December 2026, concerns specific additional steel products and was preceded by a stakeholder consultation held between 28 July 2026 and 28 September 2026. A broader review is scheduled to follow by 30 June 2027, with particular attention to downstream products containing significant amounts of steel.

On 28 September 2026, the Commission opened a second [targeted consultation](#) until 11 October 2026 to gather information on the implementation and immediate effects of the *EU Steel Regulation* on upstream and downstream industries, third-country exporters, and other stakeholders. The timing overlaps with the entry into application of the mandatory “*melt and pour*” evidence regime, providing stakeholders with an opportunity to report early experiences relating to the required documentation, Customs implementation, and administrative burden.

For businesses, the new EU steel import regime creates material commercial and compliance risks. Imports above the applicable TRQ may face a 50% duty, while insufficient “*melt and pour*” evidence may prevent importation. Importers should, therefore, ensure that contractual arrangements foresee the provision of the *Mill Test Certificate* and, where needed, complementary evidence. Businesses are further encouraged to monitor quota utilisation and the Commission’s reviews of the product-scope, seek expert advice where appropriate, and make use of stakeholder consultations and other opportunities to raise concerns.

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Aligning rules for the digital economy: The pursuit of Digital Economy Agreements by ASEAN and ASEAN Member States

By Alya Mahira, Imelda Jo Anastasya, and Paolo R. Vergano

Recent developments highlight the growing *momentum* behind international commitments for the digital economy, both within the *Association of Southeast Asian Nations* (hereinafter, ASEAN) and beyond. On 19 September 2026, the ASEAN Member States [announced](#) that the landmark *ASEAN Digital Economy Framework Agreement* (hereinafter, DEFA) would be signed on the sidelines of the 49th ASEAN Summit, which will be held from 16 to 18 November 2026, in Manila, the Philippines. Separately, on 17 September 2026, Chile, New Zealand, Singapore, and South Korea [welcomed](#) Costa Rica as the fifth Party to the [Digital Economy Partnership Agreement](#) (hereinafter, DEPA).

This article provides an overview of developments in relation to these digital economy agreements, examines the *ASEAN DEFA* and the *DEPA*, and highlights the different approaches to digital economy commitments pursued under these agreements.

ASEAN's evolving approach to regulating the digital economy

Recognising the importance of digitalisation for economic growth, ASEAN Member States have progressively pursued regional initiatives and instruments to advance digital integration. The *ASEAN Digital Integration Framework Action Plan 2019-2025*, adopted on 11 September 2019, identified several policy areas of relevance for ASEAN to overcome barriers to digital integration, including digital connectivity and a supportive business ecosystem. The *ASEAN Agreement on Electronic Commerce*, which entered into force on 3 December 2021, sets out commitments on cooperation among ASEAN Member States in key areas, including online consumer protection, electronic payments, and paperless trading (see *Trade Perspectives*, Issue No. 17 of 25 September 2023). While these instruments focused primarily on electronic commerce, ASEAN's regional digital agenda has gradually expanded to encompass a broader range of issues pertaining to the digital economy.

The ASEAN Digital Economy Framework Agreement (DEFA)

In September 2023, ASEAN Member States launched negotiations for the *ASEAN DEFA* with the aim of complementing existing ASEAN initiatives on electronic commerce and promoting greater alignment in ASEAN Member States' digital regulatory frameworks. Following the 14th round of negotiations, negotiations for the *ASEAN DEFA* were substantially concluded on 29 May 2026, marking a significant milestone in ASEAN's efforts to advance regional digital economic integration.

The *ASEAN DEFA* is envisioned as “*the world's most comprehensive regional agreement on the digital economy*”. Despite the negotiations having been concluded in May, neither the full final text nor parts of it have been made publicly available. The 2023 *Framework for Negotiating ASEAN Digital Economy Framework Agreement* sets out the intended scope, covering digital trade, cross-border electronic commerce; payments and electronic invoicing; digital identities and authentication; online safety and cybersecurity; cross-border data flows and data protection; competition policy; cooperation on emerging topics; and talent mobility and cooperation. The breadth of these areas, if properly implemented, would allow ASEAN to establish common rules and promote cooperation on various matters affecting the digital economy.

For instance, the *ASEAN DEFA* will, reportedly, provide an important legal foundation for the cross-border recognition, compatibility, and interoperability of digital identities, notably of the *Unique Business Identification Number* (hereinafter, *UBIN*), which refers to a single, interoperable digital business identity that would allow a company's identity and business credentials to be recognised and verified across ASEAN Member States. The *UBIN* is currently being developed on the basis of the related *Implementation Roadmap*. The *ASEAN DEFA* is further expected to introduce enforceable provisions for certain core obligations, such as on personal data protection, while commitments on emerging issues, such as artificial intelligence (hereinafter, *AI*), would remain subject to “*soft obligations*”.

Singapore's bilateral approach and the Digital Economy Partnership Agreement (DEPA)

Singapore plays a leading role in advancing digital initiatives, as reflected in its growing network of digital economy agreements with trading partners outside of the Southeast Asia region. In recent years, Singapore has pursued bilateral digital economy agreements with Australia, the EU, South Korea, and the UK (see *Trade Perspectives*, Issue No. 11 of 2 June 2025). On 17 May 2019, Chile, Singapore, and New Zealand had launched negotiations for the *DEPA*, which aims at promoting “*digital trade, trusted data flows, and inclusive digital economies among members*”. The *DEPA* is a standalone Digital Trade Agreement, and the Government of Singapore notes that it “*establishes new approaches and collaborations in*

digital trade issues”, promoting “interoperability between different regimes”, and addressing “emerging digital technology issues”.

The Agreement covers issues related to: business and trade facilitation; the treatment of digital products and related issues; data-related matters; the broader trust environment, including business and consumer trust; digital identities; emerging trends and technologies; innovation and the digital economy; cooperation among small and medium-sized enterprises; and digital inclusion. Most notably, the *DEPA* is one of the first digital economy agreements to require the Parties to promote AI governance frameworks that support the “*trusted, safe, and responsible*” use of AI technologies and to cooperate on financial technology, including through collaboration to foster entrepreneurship and develop start-up talent. The *DEPA* entered into force for the founding Parties in 2021, before South Korea and Costa Rica joined in 2024 and 2026, respectively. The expansion reflects the growing international interest in the *DEPA* as a framework for digital trade and broader digital economy cooperation.

Despite the broad scope of the *DEPA*, the Agreement primarily relies on “*soft obligations*”, as reflected in the use of the words “*shall endeavour*”. Among the provisions subject to “*soft obligations*” are, *inter alia*, those related to electronic payments, online safety and security, AI, and digital identities. On the one hand, “*soft obligations*” may be appropriate given that countries may have different levels of digital development and would, therefore, require greater flexibility in determining how and at what pace the relevant provisions are implemented. On the other hand, the non-binding nature of such obligations may make it more difficult to ensure a consistent implementation across countries and to hold them accountable where commitments are not fully implemented. Ultimately, the benefits of “*soft obligations*” will depend on their translation into concrete actions.

Implications for businesses

As more and more agreements dealing with digital economy issues are being negotiated and adopted within ASEAN and beyond, this should also have an impact on businesses in this sector, such as through more predictable and interoperable rules governing cross-border digital activities. Businesses should closely monitor the ongoing developments, identify emerging opportunities, and understand their potential regulatory and compliance implications.

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Food safety measure or trade barrier? Exports of animal products from Brazil on hold in light of the EU’s rules on antimicrobials

By Joanna Christy, Pattranit Chantaplaboon, and Paolo R. Vergano

On 3 September 2026, *Commission Implementing Regulation (EU) 2026/1189*, which amended *Commission Implementing Regulation (EU) 2021/405* and repealed *Commission Implementing Regulation (EU) 2024/2598* of 4 October 2024 laying down the list of third countries or regions thereof authorised for the entry into the Union of certain animals and products of animal origin intended for human consumption in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council as regards the application of the prohibition on the use of certain antimicrobial medicinal products, entered into force, updating the list of countries authorised to export certain animal products intended for human consumption to the EU in relation to the use of antimicrobial medicinal products. The amendment of *Regulation (EU) 2021/405* had significant commercial implications for food businesses in Brazil, as it removed Brazil from the list of countries authorised to export animal products, including beef and poultry products, to the EU.

This article provides an overview of the EU framework governing antimicrobial medicinal products, discusses the concerns raised by Members of the *World Trade Organization* (hereinafter, WTO), and highlights the implications for businesses.

EU rules on antimicrobials in animal products

The EU's regulatory framework governing veterinary medicinal products is set out in [Regulation \(EU\) 2019/6 of the European Parliament and of the Council of 11 December 2018 on veterinary medicinal products](#), which, *inter alia*, imposes requirements on the use of antimicrobial medicinal products in relation to products imported into the EU. Pursuant to Article 4(12) of [Regulation \(EU\) 2019/6](#), antimicrobials are substances that act directly on microorganisms in order to treat or prevent infections, including antibiotics, antivirals, antifungals, and antiprotozoals. Importantly, the misuse and overuse of antimicrobials in farm animals can contribute to the development of antimicrobial-resistant microorganisms, which can contaminate food derived from animals, such as meat, and may be transmitted to humans through the consumption of the contaminated food.

Articles 107(2) and 118 of [Regulation \(EU\) 2019/6](#) require non-EU countries exporting animal products for human consumption to the EU to ensure that antimicrobials are not used for the purpose of promoting growth or increasing yield. While this rule applies to EU producers since 2022, Article 5 of [Commission Delegated Regulation \(EU\) 2023/905 of 27 February 2023 supplementing Regulation \(EU\) 2019/6 of the European Parliament and of the Council as regards the application of the prohibition of use of certain antimicrobial medicinal products in animals or products of animal origin exported from third countries into the Union](#) provides that the European Commission (hereinafter, Commission) must establish a list of third countries that are authorised to export animal products to the EU in light of the EU rules on antimicrobials. In order to be included on the list, third-country competent authorities must demonstrate that their official controls, traceability systems, and the consignment-level certification of animal products comply with the EU's rules on antimicrobials.

The first list of third countries authorised to export animal products to the EU was established in 2024 by [Commission Implementing Regulation \(EU\) 2024/2598](#). The list covered a total of 72 countries and 13 commodity categories, including, *inter alia*, bovine, poultry, aquaculture, milk, eggs, honey, and casings (see [Trade Perspectives, Issue No. 21 of 18 November 2024](#)). According to the Commission, the list is “*revised periodically as necessary*” and Article 5 of [Regulation \(EU\) 2023/905](#) provides that the Commission updates the list based on “*evidence and guarantees*” from third countries, including information received on the procedures in place to guarantee the traceability and origin of animal products. If a third country cannot or no longer demonstrate compliance with the EU's rules on antimicrobials, the Commission is to propose withdrawing that authorisation.

This year's amendment of [Regulation \(EU\) 2021/405](#) added new countries to the list, such as Indonesia, which had submitted the required evidence and guarantees, while certain authorisations were removed, notably regarding Brazil. According to the Commission, Brazil was removed as the EU had not obtained sufficient evidence demonstrating that animal products from Brazil were free of antimicrobial substances.

Addressing the EU's trade concerns over meat from Brazil

In an unfortunate and somewhat suspicious turn of events, Brazil's removal from the EU list of authorised third countries coincided with the application of the [EU-Mercosur Interim Trade Agreement](#) (hereinafter, EU-Mercosur iTA) on 1 May 2026, which will apply until all EU Member States have ratified the broader [EU-Mercosur Partnership Agreement](#). The [EU-Mercosur iTA](#) grants preferential tariff treatment to certain Mercosur agricultural products, including sensitive products such as beef, poultry, and sugar through tariff-rate quotas (TRQs), under which specified quantities may enter the EU at reduced tariffs. However, imports remain subject to all applicable EU sanitary and phytosanitary (SPS) requirements, including those on antimicrobials. Under the [EU-Mercosur iTA](#), 99,000 metric tonnes of Mercosur beef are eligible to enter the EU market at a preferential duty of 7.5%, compared to out-of-quota tariffs between 40% and 45%. In 2025, EU beef and veal consumption amounted to 6.3 million metric tonnes and, in the same year, the EU imported around 452,000 metric tonnes of beef from non-EU

countries, of which Brazil supplied around 120,000 metric tonnes, representing 26.5% of extra-EU beef imports, making it one of the EU's largest beef suppliers after the UK. This illustrates the commercial significance of Brazil's removal from the list.

Meat products had been among the products considered sensitive by the EU during the negotiations, in light of the commercial interests of certain EU Member States, such as France and Ireland, with respect to beef. It should be noted that Brazil's removal from the list was a long time in the making. In November 2025, the *Irish Farmers' Association* had presented an investigation into beef production in Brazil to EU officials, alleging "*major discrepancies in the country's over-the-counter sale of antibiotics and hormones banned in the EU*" and claiming that there were "*no credible means to certify beef from this country as meeting EU import requirements*".

The Commission had reportedly flagged concerns to the Government of Brazil, but a resolution still appears years away. On 28 September 2026, the Director for Health and Food Audits and Analysis within the Commission's Directorate-General for Health and Food Safety stated that beef exports from Brazil to the EU would likely remain suspended for about two years, as compliance with the EU's antimicrobial requirements must cover the animal's lifecycle from birth to slaughter.

Concerns over the EU's requirements on antimicrobial medicinal products

The EU's requirements in relation to antimicrobials are considered more stringent than those applied in other countries and have raised concerns regarding their consistency with the WTO's [*Agreement on the Application of Sanitary and Phytosanitary Measures*](#) (hereinafter, SPS Agreement). Pursuant to Articles 2.2, 5.1, and 5.2 of the *SPS Agreement*, SPS measures must be scientifically justified and based on an appropriate risk assessment, taking into account relevant factors, including available scientific evidence. Article 5.6 requires SPS measures to be no more trade-restrictive than necessary to achieve an appropriate level of protection.

The consistency of the EU's rules on antimicrobial medicinal products with WTO commitments has been questioned in the WTO SPS Committee under [*Specific Trade Concern \(STC\) No. 446*](#), first raised by Argentina and the US in 2018 and subsequently supported by several other WTO Members, including Australia, Brazil, Canada, Paraguay, and Uruguay. Most recently, in June 2026, Brazil and the US raised concerns that the EU's requirements on antimicrobials "*imposed burdensome certification and extraterritorial requirements without a sufficiently robust risk assessment, contrary to the SPS Agreement, and departed from internationally recognized risk-based approaches*".

WTO Members are concerned that the EU's regime goes beyond relevant international standards by making market access conditional on compliance with EU restrictions on antimicrobial use during animal production in third countries. In contrast, international standards generally focus on controls applicable to imported products, including by means of inspections, residue monitoring, and testing for antimicrobial residues. While WTO Members may adopt more stringent measures than international standards, the EU's production-related requirements governing the use of antimicrobials in food-producing animals, including the prohibition of their use for growth promotion, must nevertheless be supported by an appropriate risk assessment and sufficient scientific evidence, and must not impose restrictions beyond what is reasonably necessary to achieve the EU's chosen level of protection.

In response, the EU acknowledged that its regime imposed stricter requirements on antimicrobial use, but emphasised that these requirements apply equally to EU operators and third-country exporters. The EU justified these measures as necessary to combat antimicrobial resistance and prevent it from entering the food chain through imported products.

Wider market implications for Brazilian meat exports

The amended list of third countries authorised to export animal products to the EU in light of the rules on antimicrobials has significant market access implications for Brazil's meat products, particularly beef, and this not only vis-à-vis the EU, but also with respect to other countries, such as Albania, Northern Ireland, and Switzerland, as these countries apply EU-aligned import requirements to animal products from third countries. While Brazil is undertaking significant efforts to regain its listing, this process is likely to take several years with important implications for global beef trade.

For any additional information or legal advice on this matter, please contact Paolo R. Vergano

Recently adopted EU legislation

Trade Law

- *Council Decision (EU) 2026/2144 of 22 September 2026 amending Decision (EU) 2021/1765 on the position to be taken on behalf of the European Union, for the period 2021-2026, within the Specialised Committee on Fisheries established by the Trade and Cooperation Agreement between the European Union and the European Atomic Energy Community, of the one part, and the United Kingdom of Great Britain and Northern Ireland, of the other part*

Trade Remedies

- *Commission Implementing Regulation (EU) 2026/2088 of 18 September 2026 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of certain alkyl phosphonic acids and their sodium salts originating in the People's Republic of China*
- *Commission Implementing Regulation (EU) 2026/2089 of 18 September 2026 amending Implementing Regulation (EU) 2022/191 imposing a definitive anti-dumping duty on imports of certain iron or steel fasteners originating in the People's Republic of China following acceptance of a request for new exporting producer treatment*
- *Commission Implementing Regulation (EU) 2026/2162 of 29 September 2026 making imports of solid glass microspheres (commercially known as glass beads) originating in the People's Republic of China subject to registration with a view to allowing the levy of anti-dumping duties on the imports subject to registration*
- *Commission Implementing Regulation (EU) 2026/2101 of 24 September 2026 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of pea protein originating in the People's Republic of China*
- *Commission Implementing Regulation (EU) 2026/2118 of 24 September 2026 making imports of Pekin duck originating in the People's Republic of China subject to registration with a view to allowing the levy of anti-dumping duties on the imports subject to registration*

Food Law

- *Commission Implementing Regulation (EU) 2026/2149 of 21 September 2026 amending Annexes V and XIV to Implementing Regulation (EU) 2021/404 as*

regards the entries for the United States in the lists of third countries, territories, or zones thereof authorised for the entry into the Union of consignments of poultry and germinal products of poultry, and of fresh meat of poultry and game birds

Other

- *Commission Delegated Regulation (EU) 2026/1563 of 3 July 2026 amending Delegated Regulation (EU) 2023/2772 as regards the simplification of certain sustainability reporting standards*
- *Commission Delegated Regulation (EU) 2026/1560 of 3 July 2026 supplementing Directive 2013/34/EU of the European Parliament and of the Council by establishing sustainability reporting standards for voluntary use by undertakings protected by the value chain cap*

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