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The EU's draft *Public Procurement Act*: Towards greater competitiveness and strategic autonomy, while antagonising trading partners?

By Florette Peter, Joanna Christy, and Tobias Dolle

On 9 September 2026, the European Commission presented its *Proposal for a Regulation of the European Parliament and of the Council on public contracts and concessions, repealing Directive 2014/23/EU, 2014/24/EU and 2014/25/EU, and amending Regulations (EC) No 1370/2007, (EU) 2023/1542, (EU) 2024/1157, (EU) 2024/1735, (EU) 2024/1781, (EU) 2024/2847, (EU) 2024/3110 and (EU) 2025/40, and Directives 2008/98/EC, (EU) 2019/882, (EU) 2022/2381, (EU) 2023/1791 and (EU) 2024/1760* (hereinafter, proposed Public Procurement Act), which would replace the EU's current public procurement directives with a single, directly applicable legal instrument. The proposed Public Procurement Act aims at simplifying and modernising the EU rules governing public contracts for works, supplies, and services, as well as concessions across sectors, and would introduce measures aimed at strengthening the EU's industrial competitiveness and resilience, notably by including origin-related award criteria.

This article examines the key elements of the *Proposal*, focusing on the revised procurement procedures and contract award requirements, and their compatibility with the EU's international commitments, particularly under the World Trade Organization's *Agreement on Government Procurement* (hereinafter, WTO GPA).

A harmonised procurement framework

The proposed Public Procurement Act would supersede the EU's existing public procurement framework, currently governed by three Directives: 1) *Directive 2014/24/EU establishing general public procurement rules*; 2) Directive 2014/25/EU covering procurement in the water, energy, transport and postal services sectors; and 3) Directive 2014/23/EU governing concession contracts, and would amend related EU legislation. Through the change of regulatory instrument, from several Directives, which had to be transposed by EU Member States into EU Member State law, to a directly applicable Regulation, the European Commission would establish a more uniform EU-wide framework, removing certain flexibilities previously accorded to EU Member States when transposing the Directives.

The new framework would continue to apply across public procurement, specifically to tenders whose contract value is above specific thresholds (for example, EUR 5 382 000 for public

works). National EU Member States' rules, which must comply with the general principles set out in the proposed Public Procurement Act, would apply to tenders below such thresholds.

The Proposal is now subject to the EU's ordinary legislative procedure, in which the European Parliament and the Council of the EU act as co-legislators and must agree on the final text.

Simplifying tendering?

The proposed Public Procurement Act would replace the current five principal procurement procedures with two flexible main routes: 1) An '*open procedure'*, in which operators submit tenders for specific contracts directly; and 2) A '*dynamic procedure'*, in which operators join an open pool of suppliers and are then invited to compete for individual contracts. Both procedures could operate with or without selection criteria and negotiations. A complementary innovation procedure would integrate the entire innovation cycle, including development, testing, and commercial purchase of solutions not yet available on the market, into a single structured process.

Compared to the current framework, which separates open, restricted, negotiated, competitive-dialogue, and innovation-partnership procedures, the proposed Public Procurement Act foresees streamlining these functions into a simpler and more adaptable system, while making negotiations available across the main procedures and lowering certain barriers to SME participation by limiting disproportionate turnover and experience requirements.

The proposed Public Procurement Act would also digitalise procurement through interconnected national e-procurement platforms, allowing businesses to submit information at once and enabling the automatic verification of eligibility requirements.

A new approach to awarding public contracts

Article 98 of the proposed Public Procurement Act states that "*public buyers shall award the contract to the economic operator that offers the best quality for money*", thereby reframing the current '*most economically advantageous tender*' standard around quality and value for money. For these purposes, *'quality'* would be evaluated on the basis of environmental, social, and innovation-related criteria, which must collectively represent at least 30% of the overall award score. The *Proposal* also provides for the introduction of strategic objectives into the procurement rules, namely by linking the award of public contracts to security considerations, European preference requirements, and the '*Equivalence rule'*, under which specific third-country economic operators, goods, services, and works would benefit from the same treatment as their EU counterparts.

Regarding security, Article 66(1) of the proposed Public Procurement Act mandates public buyers to take appropriate measures, at any stage of the procurement procedure, "*to ensure the protection of the security and public safety interests of the Union or one or more Member States for any public procurement procedure identified as presenting or including a risk for security or public safety*". According to Article 66(4), such measures include technical specifications, award and selection criteria, contract performance conditions, and restrictions on participation. Importantly, these measures must be proportionate to the identified risks and non-discriminatory. In addition, public buyers must, to the extent possible, clearly specify those measures in the procurement documentation.

Regarding the so-called "*European preference*", Article 73(1) of the proposed Public Procurement Act would allow public buyers to restrict participation to, or reject a tender not submitted by, "*economic operators and subcontractors originating in the Union and those that are covered, or, in the case of groups of economic operators, or any other form of joint participation, to groups which are either composed solely of Union or covered economic operators or to groups where the majority, but not all members of the group are Union or covered economic operators*". Article 70(1) and (2) of the proposed Regulation defines '*covered*' operators, goods, services, and works, as those originating from third countries that

have concluded a *Free Trade Agreement* (FTA) or another relevant international agreement with the EU, or that are parties to the WTO GPA.

While such preferential treatment would generally be optional, the European Commission could make certain requirements compulsory through future delegated acts. Notably, public buyers may choose not to apply the preference rule, including mandatory requirements, where no reasonable alternative exists, no suitable tender is presented, or where doing so would result in disproportionate costs. It should also be noted that sector-specific EU legislation takes precedence where it lays down different European preference rules, such as under Article 18(2) of the proposed *Critical Medicines Act* (CMA), which would introduce sector-specific public procurement requirements regarding critical medicines.

Article 72 of the proposed Public Procurement Act would empower the European Commission to establish, through delegated acts, that *'covered'* economic operators from a certain third country, and/or all or certain covered goods, services, or works from a certain third country, are not considered as *'covered*' where such third country breaches its national treatment commitments, restrictions are necessary to safeguard the EU's security of supply or prevent strategic dependencies, and/or the applicable international agreement permits such restrictions.

Origin requirements under WTO rules

With regard to the EU's international commitments, the European preference measures raise certain concerns under WTO rules. Although extending preferential treatment to '*covered'* third country suppliers seeks to ensure compliance with the non-discrimination obligations under Article IV of the WTO GPA, the possibility of restricting such access could be considered as a unilateral modification of the EU's GPA commitments, which would require a separate procedure.

Procurement falling outside of the GPA's scope, notably due to the applicable thresholds, may raise concerns under the national treatment obligations under Article III:4 of the General Agreement on Tariffs and Trade (GATT), particularly where local content requirements affecting imported goods do not fall within one of the derogations expressly provided by Article III:8(a) of the GATT.

It should also be considered by EU legislators that these measures, depending on their final formulation and scope, could expose the EU to reciprocal trade restrictions introduced by EU trading partners, potentially limiting EU suppliers' access to foreign procurement markets. Thus, measures aimed at improving the competitiveness of EU businesses might risk losing market access abroad, underlining the need to balance domestic and international competitiveness.

It is, therefore, welcome news that the European Commission intends to establish a new trade coordination unit within its Directorate-General for Trade and Economic Security to ensure "*coherence across departments on international trade*", notably amid the growing interconnection between industrial policy, trade, energy, and public procurement.

Challenges on the path to adoption

While there appears to be broad agreement among EU institutions and relevant stakeholders on the need for simplification, digitalisation, and less reliance on lowest-price awards, disagreements remain on how far the EU should use procurement to pursue industrial, environmental, and social objectives, and how much discretion should remain with national and local authorities.

The Council of the EU and the European Parliament are currently discussing their respective positions, which would be followed by inter-institutional *trilogue* negotiations to reach

agreement on the text. The current timetable notes the end of 2027 as the target date to conclude inter-institutional negotiations.

For any additional information or legal advice on this matter, please contact Tobias Dolle

Guardrails *vs.* innovation: Navigating Thailand's *Draft Artificial Intelligence Act* and related developments across ASEAN

By Alya Mahira, Pattranit Chantaplaboon, and Paolo R. Vergano

On 9 July 2026, Thailand's *Electronic Transactions Development Agency* (hereinafter, ETDA) under Thailand's Ministry of Digital Economy and Society (hereinafter, MDES) had launched a public consultation on Thailand's *Draft Artificial Intelligence Act* (hereinafter, Draft AI Act), which aims at establishing a unified framework for promoting and regulating responsible AI development and use. If adopted, the *Draft AI Act* would become Thailand's first comprehensive and binding legal framework for the development, deployment, and use of AI systems, while fostering innovation and addressing risks associated with AI, including potentially harmful applications. The *Draft AI Act* would complement the country's existing non-binding AI guidelines.

This article provides an overview of Thailand's regulatory framework on AI, examines the key provisions of the *Draft AI Act*, considers broader AI regulation within the *Association of Southeast Asian Nations* (hereinafter, ASEAN), and discusses potential implications for businesses.

Thailand's regulatory landscape regarding AI

To date, Thailand's AI regulatory framework remains fragmented, relying primarily on non-binding *soft law* instruments and existing sector-specific legislation. Key guidelines include the MDES' *Generative AI Governance Guideline for Organizations*, which provides practical guidance on organisational governance, risk assessment, data management, transparency, human oversight, and the responsible use of generative AI. In addition, the Thai National Science and Technology Development Agency's *Ethical Guidelines for AI* set out broader principles relating to fairness, transparency, accountability, privacy, security, and human-centred AI.

AI-related activities are also governed, to some extent, by existing legislation, including the *Personal Data Protection Act B.E. 2562* and the *Computer-Related Crime Act B.E. 2550*, which regulate various aspects also relevant in the context of AI, such as personal data processing, cybersecurity, and unlawful online content. Nevertheless, these laws do not provide for an AI-specific framework for assessing and mitigating the risks associated with AI, including discrimination, manipulation, threats to safety and fundamental rights, and the dissemination of harmful deepfakes (*i.e.*, a digital image, video, or voice that has been convincingly generated or altered to misrepresent someone).

The current general regulatory framework contains significant gaps in regulating AI, particularly with respect to transparency, human oversight, the allocation of responsibilities among actors across the AI value chain, and liability for AI-related harm. As noted by the ETDA, in Thailand, "*there is no central legal framework for promoting and regulating AI in a systematic, consistent, and appropriate manner*".

Key provisions of the Draft AI Act

Following the conclusion of the public consultation on 14 August 2026, the *Draft AI Act* underwent a post-consultation review ahead of its submission to the Thai Cabinet for approval in principle. The *Draft AI Act* would become Thailand's first binding regulatory framework for AI and would apply across the AI value chain, including to providers, deployers, developers,

and platform operators in relation to AI-generated content. The *Draft AI Act* would also apply to foreign businesses whose AI-related activities have an impact on individuals in Thailand, even where those activities take place abroad. For example, an overseas provider offering an AI service to users in Thailand could be subject to the Act, despite having no establishment in the country.

A core feature of the *Draft AI Act* would be its four-tiered, risk-based classification system, which categorises AI systems according to their potential risks, and establishes corresponding regulatory and compliance requirements:

1) '*Prohibited AI*' would refer to systems that covertly manipulate human decisions or use irrelevant personal data to unfairly deny access to essential services. The development and deployment of such systems would be prohibited in Thailand.
2) '*Designated AI*' would refer to systems affecting public safety and security (*e.g.*, AI used in regulated financial services or critical infrastructure). Their development or deployment would be subject to prior notification, registration, or licensing requirements.
3) '*High-Risk AI*' would cover systems that would be designated by a Royal Decree based on their potential impact on certain sectors, such as healthcare, telecommunications, energy, transport, and public utilities. Providers and deployers of such systems would be required to implement appropriate safeguards, including risk management procedures, technical documentation, human oversight, local representation, and incident reporting.
4) '*AI Systems Subject to Transparency Obligations*' would cover certain generative AI applications, such as chatbots, deepfakes, and other potentially misleading synthetic content, and would be subject to specific transparency requirements, including disclosing the use of AI and embedding machine-readable markings in AI-generated content.

The *Draft AI Act* would balance these safeguards with support for AI innovation. In particular, the *Draft AI Act* would establish a voluntary regulatory sandbox, allowing eligible AI systems to be tested under regulatory supervision, particularly where existing rules do not adequately accommodate the technology. The *Draft AI Act* would promote collaborative AI governance, allowing industry groups to co-develop codes of practice and technical standards that complement statutory regulations. At the same time, the authorities would be empowered to order corrective measures, impose administrative penalties, and, where an AI system causes or risks causing serious harm, suspend its deployment or restrict access to the service in Thailand.

AI regulatory developments in ASEAN

Like Thailand, several other ASEAN Member States are starting to move beyond voluntary guidance towards more formal and binding regulatory frameworks. On 10 December 2025, Viet Nam adopted *Law No. 134/2025/QH15*, which introduced strict AI risk-classification tiers, mandatory incident reporting, and compliance duties. The Philippines is also developing an *AI Development and Regulation Act*, which would establish a binding, risk-based framework for the safe and ethical development and use of AI. Similarly, Indonesia is formulating a *Draft Presidential Regulation on Ethics of Artificial Intelligence*, which would establish a national framework for the development, deployment, and use of AI.

As more ASEAN Member States move towards adopting national AI regulatory frameworks, promoting greater alignment and interoperability between these frameworks will become increasingly important to support a coherent regional approach to AI governance and facilitate cross-border AI-related activities in ASEAN.

At the regional level, ASEAN's approach to AI governance has, so far, focused primarily on regulatory cooperation, capacity-building, and the promotion of responsible AI. Key initiatives include the *ASEAN Guide on AI Governance and Ethics* and the *ASEAN Responsible AI Roadmap 2025-2030*. The *ASEAN Digital Economy Framework Agreement* (hereinafter,

DEFA) is expected to further support regional digital integration and AI regulatory convergence. The *DEFA* was substantially concluded in May 2026 and is scheduled to be signed on the sidelines of the 49th ASEAN Summit, held from 16 to 18 November 2026, in Manila, the Philippines (see *Trade Perspectives*, Issue No. 18 of 5 October 2026). In relevant part, the *DEFA* would reportedly support responsible AI by encouraging the development and adoption of appropriate AI governance and ethics frameworks.

Implications for businesses

If adopted, the *Draft AI Act* would impose significant compliance obligations on businesses developing, providing, or deploying AI systems in Thailand, including certain overseas providers. These obligations aim at mitigating high-risk hazards, prevent deceptive practices, and safeguard public safety and fundamental rights. Depending on the applicable risk classification, businesses may need to implement risk-management and human-oversight processes, maintain technical records, and adapt products to meet disclosure and labelling requirements.

These measures may entail additional compliance costs, particularly for smaller businesses and for those with limited technical or regulatory capacity. Non-compliance could expose businesses to heightened legal and operational risks. The *Draft AI Act* provides for joint liability where damage arises from AI, administrative fines of up to THB 5 million (around EUR 133,500), and the potential suspension, recall, or restriction of AI services. These risks may require businesses to reassess contracts or procurement with AI service providers and clearly allocate liability across their supply chains.

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

The European Commission authorises four new substances for use in plastic food-contact materials

By Roberto Pari, Tobias Dolle, and Paolo R. Vergano

On 29 October 2026, *Commission Implementing Regulation (EU) 2026/2412 amending Annex I to Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food* was published in the EU's Official Journal. *Regulation (EU) 2026/2412* updates the Union list of substances authorised for intentional use in plastic food-contact materials and articles, introducing four new substances. The Regulation follows scientific assessments carried out by the *European Food Safety Authority* (hereinafter, EFSA), in relation to applications submitted by the competent authorities of Belgium, France, the Netherlands, and Spain on behalf of three economic operators and one industry association.

This article examines the legal framework governing food-contact materials (hereinafter, FCMs) in the EU, with particular focus on the regime applicable to plastic materials. It then focuses on the four newly authorised substances and analyses the conditions attached to their use, before discussing the implications for food-contact material manufacturers and suppliers.

EU rules on food-contact materials

Regulation (EC) No 1935/2004 of 27 October 2004 on materials and articles intended to come into contact with food (hereinafter, FCMs Regulation) provides the EU's general framework applicable to food contact materials. Its scope extends to all materials and articles intended to be brought into contact, directly or indirectly, with food, already in contact with food and intended for that purpose, or which can reasonably be expected to transfer their constituents to food under normal or foreseeable conditions of use.

To ensure a high level of consumer protection, Article 5 of the FCMs Regulation empowers the European Commission (hereinafter, Commission) to adopt specific measures for certain

groups of materials listed in Annex I. Such measures may include the establishment of lists of authorised substances and the definition of specific conditions of use, individually referred to as '*Union list*'. Where a Union list exists, operators seeking the authorisation of a substance not yet included must submit an application through an EU Member States' competent authority. The application is subsequently assessed by the EFSA, which evaluates the substance's characteristics, intended uses, and potential risks to human health. Based on the EFSA's scientific assessment, the Commission then exercises its risk management powers to determine whether the substance should be added to the relevant Union list and, where appropriate, it may subject its use to specific conditions.

Given their widespread use in food packaging and processing applications, plastics are among the material groups listed in Annex I to the FCMs Regulation, for which the Commission may adopt specific measures pursuant to Article 5 of the FCMs Regulation. These additional rules are set out in *Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food*. The Regulation establishes, in its Annex I, a Union list of substances authorised for intentional use in plastic food-contact materials and articles. In order to be placed on the EU market, plastic food-contact materials must comply with the requirements laid down in that Regulation.

In particular, Articles 11 and 12 of *Regulation (EU) No 10/2011* seek to ensure that substances used in plastic food-contact materials do not migrate into food in quantities liable to endanger human health. While the overall migration limit (hereinafter, OML) established in Article 12 acts as a general cap on the total quantity of constituents that may migrate from a material into food simulants, Article 11 provides that specific migration limits (hereinafter, SMLs) may be established for individual substances. The Commission, when including a substance in Annex I of *Regulation (EU) No 10/2011*, may subordinate its use to SMLs, circumscribe its conditions of use and impose other restrictions, in line with the conclusions of the EFSA's scientific assessment. Such limitations and specifications are set out in the relevant entry of Annex I.

The four newly authorised substances and their conditions of use

Regulation (EU) 2026/2412 first addresses chopped carbon fibres from carbonised polyacrylonitrile (FCM No 1086), a filler used in high-performance polyether ether ketone (hereinafter, PEEK) polymers. Thanks to its ability to withstand extreme temperatures and exposure to chemicals, PEEK is increasingly used in the food-processing and packaging industry to achieve the high safety and performance standards required for compliance with food safety legislation. In its *Scientific Opinion* of 25 November 2021, the EFSA had concluded that the substance, with a minimum carbon content of 95%, is not of safety concern for consumers when used in contact with all food types and under all conditions of use at concentrations of up to 40% by weight in PEEK. Accordingly, the Commission authorised the substance subject to the conditions identified in the EFSA's assessment.

Secondly, *Regulation (EU) 2026/2412* authorises nano precipitated calcium carbonate (FCM No. 1087), a substance used as a filler in all types of polymers to impart strength and rigidity, particularly in articles intended for the long-term storage of food under normal storage conditions (between 10°C and +30°C). Following the EFSA's assessment, the substance was found not to raise any safety concerns when used as a filler in all types of polymers intended for contact with food, as the nanoparticles were shown to dissolve rapidly under simulated gastric conditions. However, the EFSA was unable to establish the safety of the substance when used in materials intended for contact with infant *formulae*, leading the Commission to exclude such uses from the authorisation. As only uncoated nanoparticles were included in the application and coated forms could present different properties, the authorisation was limited to uncoated forms of the substance. In addition, the Commission introduced a specific compliance note in Table 3 of Annex I to *Regulation (EU) No 10/2011*, specifying the risk that the overall migration limit may be exceeded when the substance is used in materials intended for contact with acidic foods.

Unlike the authorisation of the other substances included in *Regulation (EU) 2026/2412*, the approval of poly(2-hydroxypropanoic acid), n-octyl/n-decyl esters (FCM No 1088) is subject to particularly narrow conditions of use. Intended as an additive for polylactic acid (PLA) materials used in single-use food packaging (*e.g.*, films, trays, containers), the EFSA found the substance to be safe only when used at concentrations of up to 15% by weight, provided that migration does not exceed 0.05 mg/kg of food. The EFSA further noted that migration may increase significantly in the presence of starch or when tested under conditions representative of fatty foods. Reflecting these concerns, the Commission authorised the substance only for starch-free PLA materials intended for contact with water, fresh fruit, fresh vegetables, and vinegar for up to 10 days at 40°C. A specific compliance note was also introduced to highlight the risk that the SML may be exceeded in contact with certain food simulants.

Finally, the Commission authorised the mixture of 1,9-nonanediamine (hereinafter, NMDA) and 2-methyl-1,8-octanediamine (hereinafter, MODA) (FCM No 1090) for use as a co-monomer in the manufacture of polyamide PA9T. PA9T is used in both single-use and repeated-use food-contact materials designed for long-term storage and capable of withstanding heating up to 121°C. Following the EFSA's assessment, the substance was authorised for contact with all food types, except infant *formula* and human milk. The authorisation is subject to two migration limits: a limit of 0.05 mg/kg food for the combined specific migration of NMDA and MODA, and a separate limit of 5 mg/kg food for the migration of NMDA/MODA-related oligomers with a molecular weight below 1,000 Daltons (Da) generated during the manufacture of the polyamide.

Implications for businesses and the future direction of the EU FCM framework

With the authorisation of these new substances, *Regulation (EU) 2026/2412* expands the range of technologies that may be lawfully used in plastic food-contact materials placed on the EU market. Manufacturers and suppliers wishing to make use of these newly authorised substances must carefully assess whether their products comply with the applicable conditions of use, migration limits and other substance-specific restrictions.

At the same time, the time elapsed between some of the underlying EFSA opinions and the amendment of the Union list invites reflection on the overall effectiveness of the current authorisation system. In its *Evaluation of the legislation on food contact materials* of 2022, the Commission noted that, according to industry stakeholders, the duration of both the risk-assessment and risk-management phases may result in significant lost market time, despite the substantial investments required to prepare authorisation dossiers, estimated at between EUR 200,000 and more than EUR 2 million per dossier.

The Evaluation also found that the current rules do not always provide sufficient certainty as to the safety of the final food-contact material placed on the market and highlighted weaknesses in the exchange of safety and compliance information across the supply chain.

Against this background, the Commission has launched consultations with experts in this field to assess the feasibility of possible new regulatory approaches. While discussions remain ongoing, they appear to point towards a shift from a system primarily focused on the authorisation of individual substances to one that places greater emphasis on the safety of finished materials. The discussions have also highlighted the need to improve information-sharing between economic operators and to strengthen traceability and compliance mechanisms. The outcome of the consultations is expected to inform a future impact assessment to evaluate possible options for legislative reform.

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

Recently adopted EU legislation

Trade Remedies

- *Commission Implementing Regulation (EU) 2026/2409 of 5 November 2026 making imports of certain polyether polyols 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 Decision (EU) 2026/2480 of 9 November 2026 amending Implementing Decision (EU) 2022/1668 as regards the harmonised standard on equipment protection by type of protection*

- *Commission Implementing Regulation (EU) 2026/2512 of 10 November 2026 imposing provisional anti-dumping duties on imports of certain acrylic esters originating in the People's Republic of China, the Kingdom of Saudi Arabia, the Republic of South Africa and the United States of America*

- *Commission Implementing Regulation (EU) 2026/2497 of 10 November 2026 imposing a provisional anti-dumping duty on imports of copper tubes originating in the People's Republic of China, Mexico, Vietnam and Uzbekistan*

Food Law

- *Commission Implementing Regulation (EU) 2026/2523 of 9 November 2026 amending Annexes IV, V and XIV to Implementing Regulation (EU) 2021/404 as regards the entries for South Africa, Canada, the United Kingdom and the United States in the lists of third countries, territories, or zones thereof authorised for the entry into the Union of consignments of certain animals and products of animal origin*

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