

**The COVID-19 Pandemic:
21st century approaches to tracking trade policy responses in real-time**

METHODOLOGICAL NOTE

The Global Trade Alert team

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Concern has been expressed in many quarters about government resort to trade restrictions, notably limits on exports of medical goods, medicines, and agricultural and food products.

Information is needed on trade policy stance across the globe, thereby facilitating assessment of the frequency of any COVID-19 pandemic-era trade policy intervention. Complicating matters is that governments often announce to the media changes in their trade policies before publishing official decrees and implementing regulations and in advance of notifying the World Trade Organization. Before the COVID-19 pandemic, information on these matters was sparse, dispersed, and, where available, frequently incomparable.

The purpose of this initiative is to collect information on changes in trade policy towards export and imports of medical and food products so as to document the cumulative resort to trade policies since the beginning of 2020. Information on such policy changes are processed, collated, and shared with the European University Institute and the World Bank on a weekly basis. Maps summarising some of the features of the cumulative policy response are prepared as well.

Current multilateral trade disciplines allow governments under certain conditions to implement trade restrictions. This monitoring exercise does not take a position on the WTO consistency of a jurisdiction's trade restrictions. Nor consistency with any relevant regional trade agreement obligations.

Scope of this initiative

This section of the methodology note relates to the range of goods and trade policy interventions that fall within the scope of this monitoring initiative. This should not be confused with the manner in which information is reported on these policy interventions, which is described in the next section.

This initiative is confined to trade policy changes in the following sectors: medical goods and medicines, and agricultural and food products. The products falling under each of these sectoral headings are listed in the Annex. Products not listed are out of scope.

As far as export policies are concerned, policy interventions involving unilateral changes in the following policy instruments are within scope:

- Outright export bans.
- Export control policies, including export authorisation policies.
- Export quotas.
- Non-automatic export licensing requirements.
- State requisition policies that *de facto* frustrate exports.
- State exhortation to local producers not to export.
- Requirements that local producers reserve a minimum percentage or amount of their production for the local market.

As far as import policies are concerned, policy interventions involving unilateral changes in the following policy instruments are within scope:

- Import bans.
- Import tariffs.
- Import quotas.
- Tariff rate quotas for imports.
- Import licensing regimes.
- Import monitoring regimes.
- Customs-related trade facilitation measures.
- Internal taxation of imports, including any changes in value added taxes paid by importers.

Policy interventions by national and sub-national governments, as well as actions taken at the supra-national level as part of a regional trade arrangement (including customs unions), are within scope of this initiative.¹

Information acquisition

Automated methods are used to gather information in multiple languages on relevant trade policy changes from the following sources:

- The Global Trade Alert monitoring team.
- Websites of relevant government agencies (which can include finance ministries, trade ministries, customs agencies, health ministries or associated agencies, and offices of the head of government or state).
- Websites of relevant international organisations (IMF, ITC, UNCTAD, WCO, WTO).²
- Online media sources, including social media.
- Non-state organisations collecting information on the matters falling within the scope of this initiative, including law firms, consulting companies, research institutes and other academic initiatives.

These sources contain information in multiple languages. These sources were searched for key words in major languages relating to the policies and goods falling within the scope of this initiative. Such searches create leads, which are then processed. Searches are conducted daily.

¹ The conclusion of negotiations for a regional trade agreement are out of scope. As noted in the main text, the focus in this monitoring initiative is on unilateral government trade policy acts.

² The Global Trade Alert team has no control over the timing of the publication of pertinent reports by international organisations. Information in such reports will be considered for inclusion in this monitoring initiative as soon as is feasible.

It is important to appreciate that leads on government policy changes can come from an official within-jurisdiction source, an international public sector organisation, and from non-official sources including media sources.

Processing of leads and preparation of weekly spreadsheet

The purpose of processing is, given the information available, to identify those leads that legitimately characterise a trade policy change falling within the scope of this initiative. Trade policy changes thus identified are then included in a spreadsheet.

Every lead recorded in the GTA's systems is enriched in a multi-step analytical process. In the first step, an analyst provides an initial assessment of whether the lead is of topical relevance (within scope as defined in the last section), the implementing jurisdiction, the policy instrument category described, the product categories affected, and the direction of the trade policy change. This initial assessment is subsequently validated by a second analyst who confirms, amends, or rejects the first's choices. Duplicate reports about the same government action are kept on file but not reported in the spreadsheet to avoid double counting.

Once past this initial assessment, relevant leads then move into the GTA's reporting pipeline. Where missing in the first step, an official source is sought and, if found, saved for each lead. Once the official source has been located, the responsible GTA trade policy analyst processes the lead into a GTA database entry that combines a brief description of the state act along with identification of the most accurate policy instrument among a rich taxonomy plus the appropriate product and sectoral codes used by the United Nations. Having completed this second step, an initial entry in the worksheet is replaced by an updated entry based on an entry in the GTA database.

For the weekly spreadsheet resulting from this process, each report of a trade policy change includes information on:

- Whether the goods affected in question are medical products and/or food.³
- The type of information used to document the trade policy change (official source, report on the Global Trade Alert website [where over 97% of reported measures on the trade policies considered here are based on official sources], media sources, or consultancy or law firm reports).
- The jurisdiction implementing the trade policy change.
- An initial assessment whether the trade policy change is liberalising or restrictive.
- If a trade policy change has been written up on the Global Trade Alert website, the specific trade policy instrument identified in the report published there.
- The date the trade policy change was announced, where available.
- The date the trade policy change was implemented, where relevant and available.
- The date the trade policy change lapsed, where relevant and available.
- A short description of the trade policy change.
- The name of the source used to document the trade policy change.
- Whether the trade policy change represents a barrier to exports.
- Whether the trade policy change represents a barrier to imports.

³ Users should bear in mind that a policy intervention may implicate goods from more either category. Users should further bear in mind that a policy intervention may relate to only some of the products within a goods category.

- Where available on the Global Trade Alert website, the ID number where a fuller report is available that website.⁴

At the end of each working week the updated excel sheet is shared with the European University Institute and the World Bank. The last update to this worksheet can be found [here](#).

Users should be aware that media coverage of a public policy intervention may refer to broad categories of trade policy interventions stated in everyday language (such as “export curbs”), rather than the specific policy instruments identified in the previous section. Moreover not every official regulation promulgating a trade policy change precisely states the policy instrument being changed. For these reasons, some of the reports on trade policy interventions in the worksheet supplied are not that granular.

Readers are cautioned that a policy intervention reported in this worksheet may have been applied to some but not all of the products in a given category of goods. The policy intervention may not be applied uniformly within an implementing jurisdiction. Nor is the application necessarily applied on a non-discriminatory basis to every trading partner of the implementing jurisdiction.

Accuracy of information

In general, users should bear in mind that inevitably there is a trade-off between timeliness and precision and potentially accuracy of trade policy monitoring efforts. Media reports often appear sooner than official documentation for a trade policy intervention. Media reports often seek to summarise policy changes in commonly understood language, whereas trade policy regulations are often technical in nature. It is for these reasons that we seek to replace media reports over time with reports based on official sources, but until the latter is found the media report will remain in the worksheet.

Wherever possible, steps will be taken to locate an official source to update, correct, or confirm information obtained from a non-official source. Sometimes this is not possible because authorities do not publish the implementing legislation or regulations associated with a trade policy change or there are delays in publication.

In other cases, authorities do not notify information to the World Trade Organization or may not confirm information found by that organisation or other organisations, such as the World Customs Organization.

In yet other instances, official sources are not found precisely because officials have taken informal steps that affect conditions faced by exporters or importers and information about this comes to light in a media report.⁵

For a media report to be included in this monitoring exercise it must include a specific statement about a trade policy act or a statement by a relevant government official. Media reports based only on hearsay or commentary by third parties, including potentially by commercial interests, are excluded.

⁴ For a trade policy change listed in this worksheet with ID number ZZZ, the URL for the report on the Global Trade Alert website is www.globaltradealert.org/intervention/ZZZ.

⁵ In one case, a government minister from a G20 member used a media interview to put verbal pressure on local manufacturers not to see manufactured goods abroad.

Information contained in media reports are not weighted or discounted. Users might bear in mind that a policy intervention frequently generates multiple reports from distinct media sources, discounting the likelihood that an errant media source has made up the information reported.

In general, should a government believe that information collected here is inaccurate we encourage making this known to the GTA team at contact@globaltradealert.org. Corrections will be made to the entries in this spreadsheet if an official counterpart can demonstrate its concerns by sharing the relevant official documents and allows those official documents to be referred to in the published worksheet. The team implementing this initiative will give serious consideration to any official information submitted but is under no obligation to provide a response or information beyond that found in the worksheet.

Maps prepared

A total of four maps are prepared each week after the worksheet update has been completed. Two maps are prepared that reveal the cumulative⁶ imposition of export controls this year, one for medical goods and medicines and one for agricultural and food products. Two further maps are prepared that reveal the cumulative resort to import reforms for these two distinct classes of products.

On each map, a country is indicated if an official agency within its customs territory, including sub-national entities, has implemented a given trade policy choice since the start of the year, irrespective of whether the measure was subsequently removed. This approach is consistent with the goal of identifying the cumulative change in trade policy stance around the world in a sector and is relevant given concerns of tit-for-tat behaviour by governments or other copy-cat behaviour.

A trade policy change under the auspices of a regional trade agreement is taken to implicate all members of that agreement. If a member of a trade agreement makes trade policy changes independent of that agreement then, in particular if the member moves first, this will be reflected in the maps showing the evolution of policy change over time. Users wanting to track whether members of customs unions take actions in addition to those that may be taken by the union as a whole should consult the worksheets underlying the various maps.

⁶ Therefore, these maps neither claim to represent the trade policy stance at a point in time nor the number of times trade policy may have changed. Maps of the latter two matters can, however, be assembled from the information found in the weekly spreadsheet.

Annex

The products falling within the scope of this initiative are listed below:

HS Code	Product description	Product category
803	Bananas, excluding plantains	food
1003	Barley	food
1008	Buckwheat, millet and canary seeds; other cereals	food
405	Butter and other fats and oils derived from milk	food
1701	Cane or beet sugar and chemically pure sucrose	food
406	Cheese and curd	food
1201	Citrus fruit, fresh or dried	food
1801	Cocoa beans, whole or broken, raw or roasted	food
1513	Coconut, palm kernel or babassu oil	food
901	Coffee, whether or not roasted or decaffeinated	food
306	Crustaceans, live, fresh, cooked, etc.	food
407	Eggs	food
1504	Fats and oils and their fractions	food
304	Fish filets & other fish meat, fresh, chill or frozen	food
305	Fish, dried, salted, smoked, etc.	food
1208	Flours and meals of oil seeds or oleaginous fruits	food
1007	Grain sorghum	food
1508	Ground-nut oil and its fractions	food
1202	Ground-nut, not roasted or otherwise cooked	food
708	Leguminous vegetables; shelled or unshelled, fresh or chilled	food
1005	Maize (corn)	food
207	Meat and edible offal, of the poultry of heading 0	food
201	Meat of bovine animals, fresh or chilled	food
204	Meat of sheep or goats, fresh, chilled or frozen	food
203	Meat of swine, fresh, chilled or frozen	food
401	Milk and cream, not concentrated or sweetened	food
802	Nuts (excluding coconuts, Brazils and cashew nuts); fresh or dried, whether or not shelled or peeled	food
801	Nuts, edible; coconuts, Brazil nuts and cashew nuts, fresh or dried, whether or not shelled or peeled	food
1004	Oats	food
1207	Olive oil and its fractions	food

1509	Other oil seeds and oleaginous fruits	food
1511	Palm oil and its fractions, whether or not refined	food
701	Potatoes; fresh or chilled	food
1514	Rape, colza or mustard oil and fractions	food
1006	Rice	food
1002	Rye	food
805	Soya beans, whether or not broken	food
1507	Soya-bean oil and its fractions	food
1512	Sunflower-seed, safflower or cotton-seed oil and fats	food
713	Vegetables, leguminous; shelled, whether or not skinned or split, dried	food
1001	Wheat and meslin	food
300213	Immunological products, unmixed, ... not for retail sale	Medical Supplies
220710	Undenatured ethyl alcohol, of actual alcoholic strength of $\geq 80\%$	Anti-epidemic goods
220890	Alcohol solution - Undenatured, 75% ethyl alcohol	Anti-epidemic goods
284700	Hydrogen peroxide, whether or not solidified with urea	Anti-epidemic goods
290512	Isopropyl Alcohol	Anti-epidemic goods
300120	Extracts of glands or other organs or of their secretions, for organo-therapeutic uses	Medical Supplies
300190	Dried glands and other organs for organo-therapeutic uses; heparin and its salts, ...	Medical Supplies
300212	Antisera and other blood fractions	Medical Supplies
300214	Immunological products, mixed, ... not for retail sale	Medical Supplies
300215	Immunological products, ... for retail sale	Medical Supplies
300219	Immunological products, n.e.s.	Medical Supplies
300220	Vaccines for human medicine	Medicines

300290	Human blood; animal blood ...; toxins, cultures of micro-organisms and similar products	Medical Supplies
300310	Medicaments containing penicillins ... not for retail sale	Medicines
300320	Medicaments containing antibiotics, ... not for retail sale	Medicines
300331	Medicaments containing insulin, ... not for retail sale	Medicines
300339	Medicaments containing hormones ... not for retail sale	Medicines
300341	Medicaments containing ephedrine ... not for retail sale	Medicines
300342	Medicaments containing pseudoephedrine "INN" or its salts, ... not for retail sale	Medicines
300343	Medicaments containing norephedrine or its salts, ... not for retail sale	Medicines
300349	Medicaments containing alkaloids or derivatives thereof, ... not for retail sale	Medicines
300360	Medicaments containing any of the following antimalarial active principles: ... not put up for retail sale	Medicines
300390	Medicaments consisting of two or more constituents mixed together for therapeutic or prophylactic uses, not for retail sale	Medicines
300410	Medicaments containing penicillins or derivatives thereof ... for retail sale	Medicines
300420	Medicaments containing antibiotics, ... for retail sale	Medicines
300431	Medicaments containing insulin but not antibiotics, ... for retail sale	Medicines
300432	Medicaments containing corticosteroid hormones, ... for retail sale	Medicines
300439	Medicaments containing hormones or steroids ... for retail sale	Medicines
300441	Medicaments containing ephedrine or its salts, ... for retail sale	Medicines
300442	Medicaments containing pseudoephedrine "INN" or its salts, ... for retail sale	Medicines
300443	Medicaments containing norephedrine or its salts, ... for retail sale	Medicines
300449	Medicaments containing alkaloids or derivatives thereof... for retail sale	Medicines
300450	Medicaments containing provitamins, vitamins,... for retail sale	Medicines
300460	Medicaments containing any of the following antimalarial active principles ... for retail sale	Medicines
300490	Medicaments consisting of mixed or unmixed products ... for retail sale	Medicines
300510	Adhesive dressings and other articles ... put up for retail sale for medical, surgical, dental or veterinary purposes	Medical Supplies
300590	Wadding, gauze, bandages and the like put up for retail sale for medical, surgical, dental or veterinary purposes	Medical Supplies

300610	Sterile surgical catgut, similar sterile suture materials,...	Medical Supplies
300620	Reagents for determining blood groups or blood factors	Medical Supplies
300630	Opacifying preparations for x-ray examinations; diagnostic reagents for administration to patients	Medical Supplies
300650	First-aid boxes and kits	Medical Supplies
300670	Gel preparations designed to be used in human or veterinary medicine ...	Medical Supplies
340111	Hand soap	Anti-epidemic goods
340130	Hand soap	Anti-epidemic goods
340212	Cationic organic surface-active agents	Anti-epidemic goods
340213	Non-ionic organic surface-active agents	Anti-epidemic goods
340220	Other cleaning products	Anti-epidemic goods
350400	Peptones and their derivatives; other protein substances and their derivatives, n.e.s.; ...	Anti-epidemic goods
350790	Enzymes and prepared enzymes, n.e.s.	Medical Supplies
370110	Photographic plates and film in the flat, sensitised, unexposed, for X-ray	Medical Supplies
370210	Photographic film in rolls, unexposed, for X-ray	Medical Supplies
380894	Disinfectants, put up in forms or packings for retail sale	Anti-epidemic goods
382100	Prepared culture media for the development or maintenance of micro-organisms	Medical Supplies
382200	Diagnostic or laboratory reagents on a backing, prepared diagnostic or laboratory reagents and certified reference materials	Medical Equipment

382499	Hand sanitizer	Anti-epidemic goods
390421	Chlorine	Anti-epidemic goods
391610	Raw Materials to produce masks	Anti-epidemic goods
391620	Raw Materials to produce masks	Anti-epidemic goods
391690	Raw Materials to produce masks	Anti-epidemic goods
392329	Sharps container boxes	Medical Supplies
392390	Bio-hazard bag	Medical Supplies
392620	Articles of apparel and clothing accessories produced by the stitching or sticking together of plastic sheeting	Medical Supplies
392690	Face masks	Medical Supplies
401490	Hygienic or pharmaceutical articles	Medical Supplies
401511	Surgical gloves, of vulcanised rubber	Medical Supplies
401519	Gloves, mittens and mitts, of vulcanised rubber	Medical Supplies
401590	Gloves	Medical Supplies
481810	Hand drying tissue	Anti-epidemic goods
481890	Paper bed sheets	Anti-epidemic goods
560311	Textile raw material for masks and coveralls	Anti-epidemic goods
560312	Textile raw material for masks and coveralls	Anti-epidemic goods

560313	Textile raw material for masks and coveralls	Anti-epidemic goods
560314	Textile raw material for masks and coveralls	Anti-epidemic goods
560391	Textile raw material for masks and coveralls	Anti-epidemic goods
560392	Textile raw material for masks and coveralls	Anti-epidemic goods
560393	Textile raw material for masks and coveralls	Anti-epidemic goods
560394	Textile raw material for masks and coveralls	Anti-epidemic goods
560410	Raw Materials to produce masks	Anti-epidemic goods
560600	Raw Materials to produce masks	Anti-epidemic goods
590700	Disposable chemical protective overalls	Medical Supplies
600240	Raw Materials to produce masks	Anti-epidemic goods
600290	Raw Materials to produce masks	Anti-epidemic goods
611300	Protective garments	Medical Supplies
611420	Protective garments	Medical Supplies
611430	Protective garments	Medical Supplies
611490	Protective garments	Medical Supplies
611610	Protective garments	Medical Supplies

621010	Protective clothing	Medical Supplies
621020	Gloves	Medical Supplies
621030	Protective garments	Medical Supplies
621040	Protective garments	Medical Supplies
621050	Protective garments	Medical Supplies
621132	Protective garments	Medical Supplies
621133	Protective garments	Medical Supplies
621139	Protective garments	Medical Supplies
621142	Protective garments	Medical Supplies
621143	Protective garments	Medical Supplies
621149	Protective garments	Medical Supplies
621600	Protective garments	Medical Supplies
621790	Medical Masks	Anti-epidemic goods
630790	Face masks	Anti-epidemic goods
650500	Disposable medical headwear	Medical Supplies
650610	Other medical headwear	Medical Supplies
701710	Laboratory, hygienic or pharmaceutical glassware, of fused quartz or other fused silica	Medical Supplies
701720	Laboratory, hygienic or pharmaceutical glassware having a linear coefficient of expansion $\leq 5 \times 10^{-6}$ per kelvin within a temperature range of 0°C to 300°C	Medical Supplies
701790	Laboratory, hygienic or pharmaceutical glassware n.e.s	Medical Supplies

721790	Raw Materials to produce masks	Anti-epidemic goods
732690	Raw Materials to produce masks	Anti-epidemic goods
760410	Raw Materials to produce masks	Anti-epidemic goods
760429	Raw Materials to produce masks	Anti-epidemic goods
761699	Raw Materials to produce masks	Anti-epidemic goods
841391	Flow-splitter, for oxygen supply	Medical Equipment
841920	Medical, surgical or laboratory sterilizers	Medical Supplies
842129	Fit test kit	Medical Supplies
842139	Oxygen concentrators	Medical Equipment
842199	Full face mask filters anti-aerosol FFP3	Medical Supplies
847989	Humidifier, non-heated	Medical Equipment
900490	Protective spectacles and visors	Medical Supplies
901050	Apparatus and equipment ; negatoscopes	Medical Equipment
901110	Stereoscopic optical microscopes	Medical Equipment
901180	Optical microscopes	Medical Equipment
901811	Electro-cardiographs	Medical Equipment
901812	Ultrasonic scanning apparatus	Medical Equipment
901813	Magnetic resonance imaging apparatus	Medical Equipment

901814	Scintigraphic apparatus	Medical Equipment
901819	Other electro-diagnostic apparatus	Medical Equipment
901820	Ultraviolet or infra-red ray apparatus used in medical, surgical, dental or veterinary sciences	Medical Equipment
901831	Syringes, with or without needles, used in medical, surgical, dental or veterinary sciences	Medical Supplies
901832	Tubular metal needles and needles for sutures, used in medical, surgical, dental or veterinary sciences	Medical Equipment
901839	Needles, catheters, cannulae and the like, used in medical, surgical, dental or veterinary sciences	Medical Equipment
901890	Instruments and appliances used in medical, surgical or veterinary sciences, n.e.s.	Medical Equipment
901920	Ozone therapy, oxygen therapy, aerosol therapy, artificial respiration or other therapeutic respiration apparatus	Medical Equipment
902000	Face masks	Medical Supplies
902150	Pacemakers for stimulating heart muscles	Medical Equipment
902212	Computer tomography apparatus	Medical Equipment
902214	Apparatus based on the use of X-rays, for medical, surgical or veterinary uses	Medical Equipment
902219	Apparatus based on the use of X-rays	Medical Equipment
902221	Apparatus based on the use of alpha, beta or gamma radiations, for medical, surgical, dental or veterinary uses	Medical Equipment
902229	Apparatus based on the use of alpha, beta or gamma radiations, n.e.s	Medical Equipment
902230	X-ray tubes	Medical Equipment
902290	X-ray generators, high tension generators, control panels and desks, screens, ...	Medical Equipment
902511	Thermometers, liquid-filled, for direct reading, not combined with other instruments	Medical Equipment
902519	Thermometers and pyrometers, not combined with other instruments	Medical Equipment
902780	Instruments and apparatus for physical or chemical analysis, or for measuring or checking viscosity ...	Medical Equipment

903020	Oscilloscopes and oscillographs	Medical Equipment
940290	Operating tables, examination tables, and other medical, dental, surgical or veterinary furniture	Medical Equipment
390210	Raw Materials to produce masks -polypropylene	Anti- epidemic goods