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REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL

44th Annual Report from the Commission to the European Parliament and the Council on the EU's Anti-Dumping, Anti-Subsidy and Safeguard activities and the Use of Trade Defence Instruments by Third Countries targeting the EU in 2025

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EXECUTIVE SUMMARY

This is the 44th Report on the European Union's (EU) trade defence activity. It covers the EU's anti-dumping, anti-subsidy and safeguard activities, third countries' trade defence activities with respect to goods imported from the EU and the Hearing Officer's activities in 2025. It is accompanied by a Commission Staff Working Document providing more detailed information and statistics.

The year 2025 was another important year for the EU's trade defence activity with continued high demand for action to protect European industry from both dumped, subsidised and surging imports. 2025 witnessed the imposition of a rarely used safeguard measure on ferro alloys. Just slightly below the record high of the previous year, the Commission initiated 32 new investigations. The increased demand for trade defence is an indicator of the rise in unfair trade practices harming EU industry and the gravity of the situation, in particular in the chemical sector, which was again evident in 2025, given that it accounted for over a third of the new cases initiated in 2025. This persistent high level of activity continues to exert pressure on the trade defence services. Yet, the commitment to defend industry against unfair trade practices remained steadfast.

In 2025, the EU increased the number of measures in place from 199 at the start of the year to 232 measures protecting over 637 000 direct manufacturing jobs by year's end. While the iron and steel sector accounts for almost a third of the measures, unsurprisingly the chemical sector is also prevalent accounting for almost a quarter of the measures.

In 2025, the effectiveness of trade defence measures continued to be a high priority for the Commission as it is crucial to the strength of the instruments. The retroactive application of measures in three cases showed the Commission's resolve in providing early protection for industry where legally justified. This was facilitated by the automatic registration of imports in all new anti-dumping and anti-subsidy investigations which enabled precise tracking of trade flows. Monitoring import levels and market developments in association with industry and acting against circumvention also continued throughout the year. Furthermore, to enhance the monitoring of trade flows of products subject to company-specific measures, the Commission developed a new exporter reporting and consignment tracking tool in 2025 which became effective at the start of 2026 to monitor a price undertaking accepted concerning imports of battery electric vehicles. Circumvention remains a challenge, with evasion of measures by practices such as transhipment via third countries involving minimal-value assembly operations increasing. One anti-circumvention investigation in 2025 resulted in the extension of anti-dumping measures on monosodium glutamate from China to Malaysia to tackle exactly such a practice.

2025 saw a marked increase in the number of Court actions challenging trade defence measures, with 18 new cases lodged, up from 10 in 2024. However, these include six challenges to the countervailing duties on Chinese electric vehicles imposed in 2024. At the same time, out of eight rulings delivered by the General Court in 2025, the Commission won seven. Some important legal principles were confirmed, including the right to proceed with investigations even after industry withdraws a complaint, the methodology for determining normal value where domestic sales data is lacking and the assessment of likelihood of continuation or recurrence of dumping and injury in expiry reviews with safeguard measures in place. While the recent jurisprudence underscores the robustness of the EU's trade defence measures, the increased legal scrutiny highlights the need for the Commission to apply the legislation correctly from complaint stage through to the imposition of measures.

In 2025, the EU played a proactive and assertive role in the WTO's trade defence committees, robustly defending its measures, while challenging unfair practices and specific investigations by some trading partners which impact EU exporters. The EU's commitment to the work of these Committees is crucial to reinforce and uphold the rules-based trading system while ensuring that European industries are protected against unfair competition in a legally sound manner. In the Subsidies and Countervailing Measures Committee, the EU stressed the urgent need for greater transparency given the poor level of reporting of market-distorting subsidies by many WTO Members.

There were 181 trade defence measures in force by third countries against EU exports at the end of 2025, 14 more than at the start of the year. On the other hand, the number of new investigations initiated in 2025 targeting the EU and its Member States showed a slight decrease from 34 in the previous year to 30. While China's investigations on imports of brandy, pork and dairy from the EU involved numerous Commission interventions at all levels, from technical to political, China persisted in applying measures despite the weaknesses of these cases. Nevertheless, the Commission continues to explore how to pursue these and other unwarranted trade defence actions impacting EU exporters. Such efforts have resulted in some successes such as the closing of the anti-dumping and anti-subsidy investigations by Australia which have long targeted Italian exports of tomatoes including the imposition of ant-subsidy measures against programs under the Common Agricultural Policy (CAP) which were not countervailable.

Arising out of the increased demand for trade defence in 2025, the Commission met with many industry representatives at company, sectoral and national association level to exchange views on the instruments, manage expectations and hear proposals on how the instruments are used going forward. One clear message to industry in the current difficult climate is to act fast by reacting earlier and preparing better to avoid that negative trends become negative results. This approach can help the Commission help industry and continue to make good on President von der Leyen's promise in her State of the Union address in September 2025 that "...we will always protect our industry from unfair competition".

Finally, the report includes a separate section describing the import surveillance task force, announced in April 2025, to monitor harmful trade diversion, where goods might be redirected to the EU due to high tariffs elsewhere. The task force tracks imports and identifies potentially damaging imports and, in conjunction with industry, uses the data to identify risks and, if necessary, take appropriate action.

This evidence driven approach has strengthened the EU's capacity to protect its open market from unfair competition from imports, However, since spring 2025, the trade landscape has changed due to the notable de-escalation of US tariffs, resulting in a diminished incentive to divert trade. Concurrently, the primary concern voiced by EU industry has shifted from short-term trade diversion to the broader, longer-term import pressure driven by global overcapacities, particularly originating in China. To address these concerns, the Commission will introduce a methodology during 2026 to capture sustained, longer-term increases in imports, rather than identifying short-term changes caused by tariff driven trade diversion.

I APPLICATION OF TRADE DEFENCE INSTRUMENTS (TDI) IN 2025

1. INVESTIGATIVE ACTIVITY

1.1. General overview

At the end of 2025, the EU had 232 (provisional and definitive) trade defence measures in force, composed of 159 anti-dumping (AD) measures, 39 extensions of anti-dumping measures following anti-circumvention investigations, 25 anti-subsidy (AS) measures, 7 extensions of anti-subsidy measures following anti-circumvention investigations and 2 safeguard (SFG) measures. These measures protect over 637 000 direct jobs in the EU.

In 2025, the Commission worked on 32 new investigations and 21 reviews initiated, as well as 67 investigations which were ongoing at the start of the year. The Commission concluded 26 new investigations and 29 reviews during the year.

This report is accompanied by a Commission Staff Working Document which provides more information and statistics and includes annexes for the sections below.

1.2. Anti-dumping (AD) and anti-subsidy (AS) investigations (see Annexes A to I)

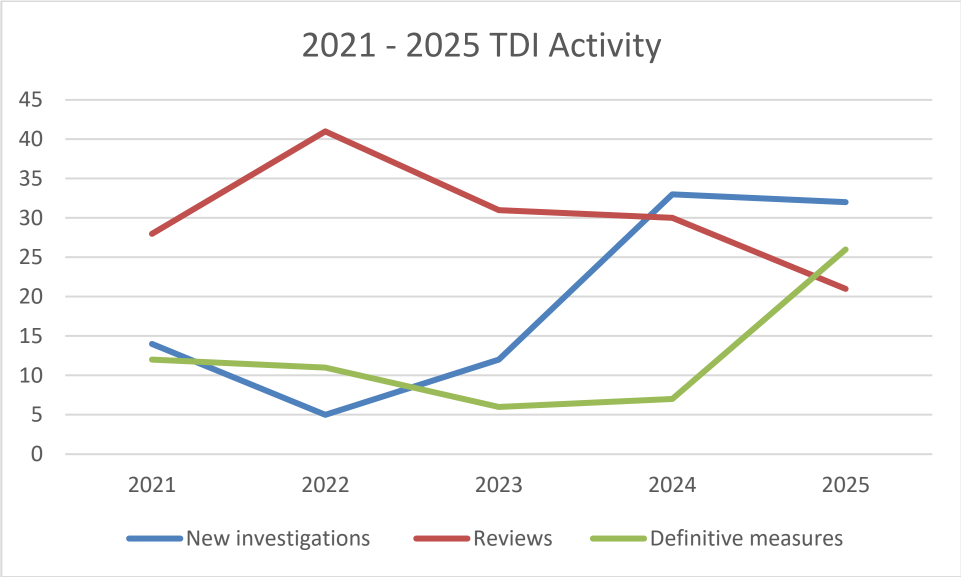
In 2025, the Commission initiated 32 new investigations (30 AD and 2 AS). This almost equals the record number of investigations of 33 new investigations initiated in 2024. This level of activity represents a very significant increase when compared to the previous historical annual average of 12 new cases a year. The chemical sector continued to dominate the new cases initiated, accounting for over a third of initiations. Iron and steel products also featured with 9 cases initiated concerning products in that sector.

The Commission initiated 21 reviews in 2025, which was a drop compared to 30 reviews initiated in 2024. The majority (18) of these were expiry reviews with the remaining initiations comprising 1 interim review, 1 anti-circumvention investigation and 1 re-opening. The number of expiry reviews is linked to the 5-year lifecycle of measures.

In total, 53 new and review investigations were initiated, which was a decrease on the 63 investigations opened the previous year. This is however due to a decrease in the number of reviews.

The Commission imposed 27 provisional measures (all AD) and concluded 26 investigations (23 AD and 3 AS) by imposing definitive measures. The Commission terminated 3 AD investigations without imposing measures.

In 2025, 18 expiry reviews were concluded with the extension of the duties being confirmed. No measures expired automatically at the end of a 5-year period of imposition.



1.3. Safeguard investigations

There were no safeguard (SFG) investigations initiated in 2025. There was a functioning review of the steel safeguard completed in 2025 and one safeguard measure imposed on ferro-alloys in 2025.

Functioning review - SFG measure concerning certain steel products

On 25 March 2025, the European Commission introduced adjustments to the functioning of the EU steel safeguard to ensure the continued effectiveness of the measure. The investigation, initiated in November 2024 following a request from several Member States, showed that it was necessary to adjust the management of the measure. It was needed to bring short-term relief to EU steel industry, which was under significant import pressure due to growing global overcapacity, increasing third country trade measures, the subsequent risk of additional trade diversion into the Union coupled with a contraction in Union demand for steel.

Previously, market expectations were that global demand for steel would increase and, as a result, quotas had been liberalised by more than 25% since the imposition of measures in 2019. At that time, this was in the overall interest of the European Union, particularly to benefit users and accommodate the expected increases in demand.

However, the functioning review investigation revealed that, between 2021 and 2024, consumption significantly declined (by 14%), and the Union industry was facing significant import pressure across many categories. In view of these market conditions, the Commission considered it necessary and appropriate to introduce adjustments to the functioning of the EU steel safeguard to ensure its effectiveness. The liberalisation rate was reduced from 1% to 0.1%, limiting the amount of steel that can be imported into the EU tariff-free. Additionally, the possibility for countries to use the entire volumes of unused quotas of other countries, including those of Russia and Belarus, was removed. The 'carry-over' mechanism, which allowed countries to roll over unused quotas to the next quarter, was also eliminated for categories with high import pressure and low consumption. Finally, as in previous review investigations, the Commission updated the list of developing countries exempted from the application of the measure.

Due to the adjustments introduced to category 17 ('Angles, Shapes and Sections') of the steel safeguard as part of the functioning review concluded in March 2025, the duty-free export volumes accessible to the UK and Türkiye became lower than their historical export volumes to the EU. At the same time, the EU’s intention has been to implement the safeguard measure in a way that preserves such traditional trade flows. The UK raised this matter in the context of the EU-UK summit of 19 May. In order to reach a mutually beneficial and balanced outcome of the summit, the Commission indicated its preparedness to address this issue. Consequently, on 1 August 2025, an Amending Regulation entered into force, which reinstated the country-specific quotas of the UK, Türkiye and Korea in category 17.

SFG investigation concerning imports of manganese and silicon-based alloying elements

On 19 December 2024, the Commission opened a safeguard investigation on imports of certain silicon and manganese based alloying elements following a request from several Member States. On 18 November 2025, following an in-depth investigation into market disruptions affecting Union producers, the Commission adopted a definitive safeguard measure on imports of certain ferro-alloys. The measure responds to a sustained increase in imports that placed significant pressure on the EU ferro-alloy industry and resulted in serious economic injury.

The investigation examined imports of silicon and manganese-based alloying elements over the period 2019–2024, with additional data assessed up to mid-2025. After a detailed product and market analysis, silicon and calcium-silicon were excluded from the scope, as the relevant criteria to include them were not met at the time. As a result, the final measure applies to certain ferro-alloys used primarily in the steel industry.

The Commission found that imports of ferro-alloys increased both in absolute terms and relative to Union production and consumption, particularly from 2021 onwards, thereby adversely affecting EU producers. Imports consistently entered the EU market at prices below domestic production costs, leading to price suppression, loss of market share, declining production and capacity utilisation, significant employment reductions, and financial losses across the Union industry. The Commission also established a clear causal link between the increased imports and the serious injury suffered by Union producers. Other potential contributing factors, including high energy costs and reduced export performance, were examined in detail but were found not to attenuate this causal link.

After assessing the broader Union interest, the Commission concluded that the adoption of safeguard measures was justified and proportionate. Ferro-alloys constitute strategically important inputs for key downstream sectors, including steel, automotive, construction, defence and aerospace. Maintaining a viable EU ferro-alloy industry is essential for industrial resilience, employment, and strategic autonomy.

At the same time, the Commission sought to ensure continued availability of supply for users. The safeguard measure was therefore designed in the form of product-specific tariff-rate quotas (TRQs), allowing substantial volumes of imports to enter the Union duty-free, combined with a variable out-of-quota duty aimed at preventing injurious low-priced imports.

The measure is set to apply for a period of three years and is subject to progressive liberalisation and regular review.

1.4. Verifications in investigations

The Commission ensures that the information used in trade defence investigations is accurate and complete to ensure legally sound decisions and the correct imposition of measures.

In 2025, the Commission verified data from 296 companies, 243 within the EU and 53 in third countries. All these verification visits took place on site at the companies. In addition, the Commission verified data remotely for nine companies. This process was introduced in 2020 to cope with COVID-19 travel restrictions but is being used increasingly less.

2. ASSERTIVE AND EFFECTIVE APPLICATION AND ENFORCEMENT OF TDI

2.1. Commitment to Assertive use of trade defence instruments

In her State of the Union address in September 2025, President von der Leyen again asserted that “Europe will always remain open. We like competition. But we will always protect our industry from unfair competition”. Throughout the year, the Commission continued its firm use of the trade defence instruments, demonstrated, not only by the high number of new investigations initiated but also, in some cases, applying measures retroactively where necessary. The Commission also maintained its commitment to enhanced monitoring of measures, taking action against circumvention practices as well as defending measures in the judicial system.

2.2. Registration of imports

Introduced in October 2024 to strengthen the trade defence instruments, the Commission continued to automatically register imports in all new anti-dumping and anti-subsidy investigations initiated in 2025 to enable the retroactive collection of duties, if justified and where specific legal conditions are met. In each investigation, the Commission makes a decision whether to collect retroactively at the definitive stage and taking into account the criteria under the basic regulations. The registration of imports provides the Commission with precise information about the source and quantities of imports of the product under investigation, as well as broader market developments. In three of the 26 definitive measures imposed in 2025, the criteria for retroactive application of measures were met. The cases were erythritol, multi-layered wood flooring and screws without heads, all originating in China. In all other cases, the development of import volumes and prices during the registration period did not warrant the retroactive collection of measures.

2.3. Monitoring, surveillance and enforcement of measures (see Annexes J, K, M, Q)

The credibility and effectiveness of the Union’s trade defence instruments rely on their full and correct application. When economic operators attempt to evade measures, the integrity of the system is weakened. For this reason, systematic monitoring of import flows following the imposition of duties is crucial to ensure that measures achieve their intended effect.

To enhance trade flow monitoring of products subject to company-specific measures, the Commission developed a new exporter reporting and consignment tracking tool. The new tool was introduced early in 2026 in relation to the implementation of the undertaking covering battery electric vehicles, described below.

To further expand the scope of trade flow monitoring activities relating to products subject to trade defence measures, the Commission shares, on request, import statistics with parties involved in the investigations that led to these measures being imposed. After assessing the admissibility of such requests, the Commission provided information in an aggregated and non-confidential format in 38 cases in 2025. This enabled these parties to monitor trade flows independently, supporting their efforts to track compliance with the imposed measures.

Circumvention of measures remains a problem. Where credible indications that it is happening are identified, whether through the Commission's own analysis or information provided by industry, the Commission responds promptly and decisively. Circumvention is a modification in trade patterns between third countries and the Union that results from practices, processes, or operations lacking sufficient cause or economic justification, other than avoiding the payment the trade defence duty.

The Commission continues to tackle a variety of such practices. While transhipment through third countries has traditionally been the most common method, increasingly complex forms of circumvention have emerged. Notably, assembly or completion operations, conducted both outside and within the Union, are being used to hide the true origin of goods. These operations typically involve limited industrial activity, altering the product's classification or appearance while adding negligible value. Such practices enable operators to import goods under a different Combined Nomenclature (CN) heading, thereby avoiding the duties in place. These developments demand constant vigilance, the adaptation of enforcement strategies, and increasingly sophisticated expertise and in-depth analysis during the investigations.

It should be noted that, while the WTO agreements contain no formal provisions on circumvention, the issue has become a matter of growing concern among many WTO members. The Commission participated in the informal WTO anti-circumvention group, which serves as a platform for exchanging experiences, identifying best practices, and addressing common challenges. The EU's approach has attracted particular interest, as the Commission is widely recognised as one of the most experienced in conducting anti-circumvention proceedings. Over time, the Commission has developed sophisticated procedures, tools, and methodologies to detect and address circumvention effectively, reinforcing the Union's role as a global leader in this field.

In July 2025, the Commission launched an anti-circumvention investigation concerning malleable tube fittings from China, based on alleged circumvention practices involving assembly/completion operations of Chinese parts in the EU. Also in July 2025, the Commission concluded one anti-circumvention investigation by extending the anti-dumping measures on imports of monosodium glutamate from China to imports of the product from Malaysia. In that investigation, the Commission found the product was being transhipped via Malaysia and the measures were being circumvented via further processing activities with limited added value in that country.

In 2025, there was continued cooperation on the proper implementation of TDI measures, both at the level of the relevant Commission services (DGs Trade, TAXUD and Budget), the European Public Prosecutor's Office (EPPO), the European Anti-fraud Office (OLAF), and the Member States. As regards the latter, the cooperation includes the publication of targeted risk alerts via the EU’s common customs risk management system to national customs authorities and law enforcement authorities. In addition, there were regular exchanges with the Union industry to keep track of market developments and identify appropriate follow-up actions, where needed.

The effective implementation of trade defence instruments relies on close cooperation between DG TAXUD and DG TRADE. Continuous coordination ensures the correct classification of the goods concerned, while the prompt integration of newly adopted TDI measures into TARIC (the Integrated Tariff of the European Union) following their publication in the *Official Journal of the European Union* enables customs authorities across all Member States to apply those measures consistently and without delay.

Whenever the European Commission receives reports of irregularities, whether through formal complaints or requests from EU industries, it informs the European Anti-Fraud Office (OLAF). OLAF publishes an annual report outlining its activities for further details.

In 2025, the European Public Prosecutor’s Office (EPPO) also requested the Commission’s expertise regarding specific measures under its criminal investigation.

In addition to stakeholder engagement described below in Section 8, the Commission attended regular meetings of the TAXUD Customs Experts Group. Furthermore, implementation issues were regularly discussed in a dedicated closed interest group, which comprises experts from the Commission and Member States.

DG BUDG oversees the proper and timely collection of EU revenue, including anti-dumping and countervailing duties, by Member States’ customs authorities. To support this, DG TRADE collaborated by providing interpretative guidance on trade defence legislation particularly in relation to the preparation of inspections in Member States related to TDI matters and contributed to the legal assessment in individual cases with significant financial implications.

Monitoring of undertakings also forms part of the enforcement activities, given that undertakings allow for the suspension of AD or AS measures. The Commission accepts such undertakings when it is satisfied that they can effectively eliminate the injurious effects of dumping or subsidisation and regularly checks the exporters’ compliance with the undertakings.

In 2025, there were 8 companies with undertakings in force concerning the countervailing measures in place on imports of biodiesel from Argentina. Regular monitoring of these undertakings showed that the exporting producers were complying in full.

In December 2025, the Commission initiated, ex-officio, an interim review to examine an undertaking offer made by Volkswagen (Anhui) Automotive Co., Ltd in the context of the anti-subsidy measures imposed on battery electric vehicles in October 2024 and concerning one model, the CUPRA Tavascan. Following an investigation, the Commission accepted the price undertaking in February 2026 from Volkswagen (Anhui) Automotive Company Ltd., and its related party in the EU, SEAT S.A., Martorell, Spain. The undertaking was considered appropriate to eliminate the injurious effect of the subsidies and also practicable. The investigation found that the price floor proposed by Volkswagen (Anhui) for the CUPRA Tavascan would not be injurious to EU industry. Also, SEAT’s commitments included standardising its sales channels, the limitation of export to the Union to one model of the product concerned and extensive reporting obligations. As a result, the Commission considered that there are sufficient mitigating measures to address the risk of cross-compensation. In addition to Volkswagen (Anhui) also committed to investing in significant BEV-related projects in the EU with clearly defined milestones, supporting the EU's industrial strategy and incentivising compliance with EU climate transition goals.

There were no other undertaking offers made in anti-dumping or anti-subsidy investigations concluded in 2025 that could, after legal assessment, be accepted by the Commission.

2.4. Judicial review by EU Courts (Annex S)

In 2025, the General Court and the Court of Justice issued 13 judgments and orders in cases concerning trade defence measures. The General Court issued 10 rulings out of which two orders following a withdrawal of an action. The Court of Justice decided on two appeals and one request for a preliminary ruling.

More new court proceedings concerning trade defence measures were lodged in 2025 (18 in total) compared to the previous year (10 in total in year 2024). 14 actions for annulment were lodged before the General Court out of which six concern countervailing duties on imports of new battery electric vehicles originating in the People's Republic of China and two concern duties imposed on imports of mobile access equipment originating in the People's Republic of China. In addition, two appeals concerning breach of undertakings and two requests for a preliminary ruling were lodged in 2025 before the Court of Justice.

Out of eight cases adjudicated before the General Court in 2025, the Commission prevailed in all but one, which concerned countervailing duties imposed on imports of certain rainbow trout originating in Türkiye. The Commission (and Fertilizers Europe) won two appeals concerning the initiation of an expiry review of measures on ammonium nitrate.

The Courts provided important clarifications regarding several points such as:

- the possibility to continue an investigation following the withdrawal of a complaint by the Union industry.

- the establishment of the normal value in the absence of domestic sales.

- the discretion enjoyed by the Commission when deciding about requests for individual treatment, in cases where sampling is applied.

- the assessment of likelihood of continuation or recurrence of dumping and injury in expiry reviews with safeguard measures in place.

Further information regarding some of these judgements can be found in the Staff Working Document.

3. SOCIAL AND ENVIRONMENTAL STANDARDS IN TDI

For over eight years, the EU's trade defence legislation reflects the EU's commitment to high social and environmental standards. With changes introduced in 2017 and in 2018, social and environmental standards are examined in certain aspects of investigations, where warranted and appropriate.

When selecting a representative country to determine an undistorted normal value in investigations concerning countries where there are significant state distortions, the Commission may consider social and environmental standards as part of its evaluation process. This is necessary to have an undistorted normal value when calculating dumping using the significant distortions methodology. In these cases, where the Commission is presented with more than one possible representative country, it may select the one with an adequate level of social and environmental protection.

In 2025, the Commission used the significant distortions methodology to calculate dumping margins in all 16 cases concerning China. In those cases, the Commission had no need to examine the level of social and environmental standards in any potential representative country as, in each of the cases, there was only one potential representative country with the appropriate available data.

An aspect where social and environmental standards can play an important part in determining the level of measures to be imposed is in the calculation of the injury margin. Since 2018, the Commission can include in the EU industry's costs of production, the cost of compliance with multilateral environmental agreements and International Labour Organisation Conventions during the lifetime of any measures. For example, additional future costs associated with complying with the EU Emissions Trading System, can be added. The addition of such costs can increase the non-injurious prices[1] and hence the injury margins. The impact is felt where duties imposed are based on injury, rather than dumping margins. These costs featured in eleven anti-dumping cases completed in 2025 and increased the level of measures imposed in four investigations where duties were based on injury margins – erythritol and choline chloride from China, polyvinyl chloride from Egypt and hot rolled flat steel products from Japan.

While social and environmental standards can also be considered when examining undertaking offers, there were no undertakings agreed in 2025.

4. ACTIVITIES OF THE HEARING OFFICER

The Hearing Officer plays a crucial role in ensuring that interested parties affected by procedures and measures under EU legislation concerning international trade can exercise their procedural rights, including the right to be heard. The Hearing Officer continued to follow the established practice of encouraging parties to raise their concerns with the Commission services responsible for the investigation before requesting a hearing. This approach allowed most parties to resolve their concerns directly with the investigation teams, with the Hearing Officer closely monitoring the process and remaining available to address any further issues.

In 2025 the function of the Hearing Officer underwent a transitional period as the long-standing Hearing Officer retired after the first half a year, and was followed by an interim

[1] The price which the industry is expected to have charged under normal circumstances i.e. in the absence of dumped or subsidised imports

appointment until, as of November, the newly appointed Hearing Officer assumed the position.

In 2025 the Hearing Officer received 23 requests for intervention, all concerning trade defence proceedings, and held two hearings with the interested parties. On two occasions the Hearing Officer issued proceeding-specific recommendations to the services without a hearing. In 2025, the Hearing Officer did not grant any extensions of the deadlines.

Entities requesting intervention represented all types of interested parties - users, exporting producers, Union industry representatives, a third-country government, importers and parties not registered as interested parties in proceedings.

The concerns raised by the requesting parties involved additional disclosure or objections to facts and findings, selection of representative country, confidentiality, right to be recognized as an interested party, and objections to procedural decisions.

Regarding two recommendations issued by the Hearing officer regarding the rights of parties, the Trade Defence services implemented one recommendation promptly and followed up on another. In all other proceedings concerned by the intervention requests, the Hearing Officer found that the procedural rights of all parties had been respected. Detailed account of the activities of the Hearing Officer can be found in the Annual Report of their activities.

5. DEALING WITH TRADE DEFENCE ACTIVITY AGAINST THE EU

In an increasingly unpredictable trading environment, adhering to and advocating for the rules-based system are key in the Commission's monitoring of third country trade defence investigations that impact EU exporters. Predictable and legally sound investigations and procedures are crucial so that EU exporters can properly exercise their rights of defence while maintaining market access. Defending the offensive interests of EU producers is a collaborative effort and works best when all stakeholders, i.e. companies concerned, Member States and the Commission are involved and share a common interest.

Improper and unjustified use of the instruments causes additional harm in increasingly complex global trading conditions hence the importance of monitoring these cases. In 2025, China continued the inappropriate use of the instruments with its investigations regarding imports of brandy, pork and dairy. Despite numerous Commission interventions at all levels, from technical to political, China persisted and definitive measures on imports of brandy were imposed in July 2025, on pork in December 2025 and provisional measures on dairy in December 2025. The Commission is analysing the strengths and weaknesses of any possible WTO challenge to decide what further steps to take to best defend the interests of the EU exporters.

The positive outcome of the Commission's interventions in 2025 is reflected in the following examples:

Indian anti-dumping investigation on Para Nitrotouluene (PNT)

- In June 2025, the Indian authorities initiated an anti-dumping investigation concerning imports of PNT from the European Union. In response to a request submitted by a German company, the European Commission firmly defended EU exports valued at

€5.4 million. On 11 December 2025, the Indian investigating authority terminated the investigation without imposing any anti-dumping duties.

Indonesian safeguard review investigation on imports of apparel and clothing accessories

- The Indonesian Safeguard Committee initiated an investigation on 7 November 2024 to examine a possible extension of safeguard measures on imports of apparel and clothing accessories. In view of the substantial EU economic interest, amounting to €76 million, and in close cooperation with EU industry stakeholders, the Commission intervened decisively at the initiation stage. The review investigation was subsequently terminated without the imposition of measures on 29 September 2025.

Australian anti-dumping and anti-subsidy investigations on Tomatoes (prepared or preserved)

- These investigations were initiated by Australia in October 2024. In light of the significant EU economic (estimated at €63 million) and systemic interests involved, , the Commission, in close cooperation with the Italian Government and industry, intervened strongly from the pre-initiation stage through consultations and detailed written submissions. The case has been particularly challenging, as the Australian anti-subsidy investigation targeted support under the EU Common Agricultural Policy (CAP). However, on 12 November 2025, Australia issued its preliminary report, acknowledging that CAP support does not constitute a countervailable subsidy. Subsequently, on 27 January 2026, the investigations were partially terminated with respect to several Italian tomato producers and on 2 February 2026, the investigation was terminated for all companies.

Argentinian anti-dumping investigation into Certain Boilers

- Argentina imposed antidumping measures on imports of certain boilers from Italy in 2020, with duties ranging from 24% to 57%. In March 2025, the Argentinian authorities initiated an expiry review. The Commission supported the Italian exporters by submitting arguments showing that the continued imposition of measures was not warranted. Among other reasons, the main complainant had withdrawn cooperation. The measure was eventually terminated by the Argentinian authorities in November 2025.

In 2025, 30 new investigations were initiated targeting the EU and its Member States, a slight decrease compared to 2024 when 34 new investigations were initiated. The most used instrument remains anti-dumping accounting for 17 of those new investigations with the rest being safeguards.

The most prolific users in 2025 were India with 7 new investigations, Turkey with 6 followed by the US and Egypt with 3 each and Brazil, South Africa and Thailand with 2 each. Canada, the Dominican Republic, South Korea, Madagascar and the Philippines initiated 1 new investigation each.

As regards new measures imposed, 2025 showed a significant increase with 30 new measures imposed compared to 17 in 2024. Most of these measures were safeguards (17) with 11 anti-dumping measures and 2 anti-subsidy measures. China and US imposed 4 new measures each followed by Turkey, India and Egypt with 3 each.

At the end of 2025, there were 181 measures in force against EU exports, an increase of 14 measures compared to 2024. As regards measures in place against the EU and/or Member States, the US leads with 45 measures, followed by Turkey and China with 25 and 19 measures respectively. Other users which stand out are Brazil, Canada, Indonesia, and Madagascar each with 10 measures in place. India and South Africa each have 6 measures followed by Morocco with 5 measures. Furthermore, Australia, Egypt, Thailand and Mexico have 4 measures each and Argentina has 3 measures in place. Korea, New Zealand, Philippines and United Kingdom have 2 measures each and Colombia, Ghana, Gulf Cooperation Council (GCC), Jordan, Pakistan, Southern African Customs Union, Tunisia and Vietnam have each 1 measure in force. More information on third country actions affecting the EU exports is summarised in the Staff Working Document.

The 181 total measures in force include 49 safeguard measures, which is the highest number of the last 10 years. The most frequent users of safeguards are Indonesia and Madagascar with 10 measures in force each, followed by Turkey with 8. While the measures by Indonesia and Madagascar have less impact on EU exports, the measures by Türkiye have a significant impact and concern mainly the steel, textiles and paper sectors.

6. WTO-RELATED ACTIVITIES

Twice a year, in spring and autumn, the WTO convenes meetings of the Subsidies and Countervailing, Anti-dumping, and Safeguards Committees. These Committees serve as platforms for WTO members to consult and discuss matters pertaining to the implementation of the relevant agreements by the investigating authorities. Alongside these formal Committees, the WTO also hosts subsidiary groups concerned with trade defence issues. There is an Anti-dumping Working Group on Implementation, where members exchange information on the practical application of anti-dumping investigations and an Informal Group on Anti-circumvention to discuss how members address circumvention, given the absence of such provisions in the Anti-dumping Agreement. Additionally, informal sessions for ‘Friends of Safeguards Proceedings’ facilitate discussions on specific elements of the safeguard instrument and its application. These Committees and sub-groups enable WTO members to highlight concerns about specific cases and practices of others while defending their own investigations, practices, and measures.

During the October 2025 Committees week, the EU participated in an informal meeting of the Heads of Trade Remedies Investigating authorities hosted by Australia’s Anti-Dumping Commission (ADC) and Canada’s Border Services Agency. Very useful discussions focussed on identifying ways of improving transparency and strengthening collaboration through information exchange, particularly in subsidy investigations where cooperation from exporters or foreign governments is limited.   There was an exchange of views on how authorities are adapting to keep pace with rapidly changing market conditions as well as the challenges posed by increasingly complex circumvention practices.

At the April 2025 meeting of the Special Committee on Subsidies and Countervailing Measures, members continued reviewing the subsidy notifications made in 2023 while commencing the review of notifications made in the context of the 2025 exercise at the October meeting. Compliance with notification obligations under the Agreement on Subsidies and Countervailing Measures (ASCM) remains notably poor, with only half of the members notifying by October 2025 for the latest exercise, despite the June 2025 deadline. The EU highlighted this issue, urging members to adhere to their obligations and enhance transparency regarding subsidies, given their distortive impact on global trade.

During the spring session of the regular Committee on Subsidies and Countervailing Measures, the EU defended the countervailing measures imposed in October 2024 on battery electric vehicles against strong criticism from China. In the autumn meeting, Egypt addressed the EU’s expiry review of measures on glass fibre reinforcements, suggesting the case be terminated in light of the WTO Dispute settlement proceeding on countervailing duties on Stainless Steel Cold-Rolled Flat Products from Indonesia, which tackled the issue of cross-border subsidies. The EU argued these cases were unrelated. The EU continued to raise concerns over Australia’s anti-subsidy investigation into canned tomatoes from Italy, noting that Italian tomato producers have been targeted since 1992 when Australia first imposed AD and AS measures, and addressed China's investigation into dairy products from the EU. Discussions continued, under the regular agenda item ‘Subsidies and overcapacity’, on the detrimental effect of subsidies in creating global overcapacity and the ensuing damage to global trade.

In the Anti-dumping Committee, the EU highlighted concerns regarding the UK’s anti-dumping investigation into engine oil from Lithuania, the US's administrative review on pasta from Italy, as well as reiterating previously expressed concerns about Australia’s investigation into canned tomatoes from Italy and China’s investigations on brandy and pork products from the EU. The EU urged China not to utilise trade defence instruments as retaliatory tools but to adhere to WTO rules. In these meetings, the EU responded to concerns raised about its anti-dumping investigations on hot rolled flat steel products from Egypt and Japan, optical fibre cables from India, and a review into urea ammonium nitrate from Russia. The EU also responded to both Türkiye and Japan, who criticised the EU’s investigation into cold-rolled flat steel products, mentioning the 'particular market situation' aspects. China criticised the EU for what it perceives as an increasingly protectionist stance, citing references to trade defence in several sectoral Communications adopted by the EU. The EU emphasised that its actions are complaint-driven and the increase is symptomatic of an unprecedented level of allegedly unfairly traded imports from China. Regarding the industrial policy documents, the EU stressed these reflect its unwavering commitment to addressing unfair trade practices that harm European industries in line with WTO rules.

In the Anti-dumping Working Group on Implementation, the EU engaged in discussions concerning interim and changed circumstances reviews, case filing systems, handling of documents, sampling, and the implications of non-cooperation in investigations.

At the October 2025 meeting of the Informal Group on Anti-circumvention, discussions centred around updates by members to their legal frameworks on circumvention and the implementation of anti-circumvention procedures. The group also explored emerging trends and challenges encountered in such investigations.

During the Safeguards Committee meeting, the EU addressed queries about the steel measure proposed by the European Commission on 7 October 2025, explaining that the measure aimed to mitigate the adverse effects of global overcapacity on the EU’s steel market. The EU clarified that, as the proposed measure was not a safeguard measure, the Safeguards Committee was not the appropriate forum for its discussion. The EU also responded to inquiries concerning the ongoing safeguard investigation into ferro-alloys. Since May 2025, the WTO's online tool called "Online Safeguard Action Notification Portal" has been fully operational, which the EU finds user friendly.

The WTO Agreement on Fisheries Subsidies came into force in September 2025, having attained the required two-thirds ratification threshold. WTO negotiations continued on outstanding issues to forge a comprehensive agreement on fisheries subsidies.

The EU, along with other like-minded WTO members, persevered with subsidy-related work under the WTO Fossil Fuel Subsidy Reform initiative and the Trade and Environmental Sustainability Structured Discussions.

Informal WTO deliberations on Trade and Industrial Policies also continued, with eight sessions conducted in 2025. The EU co-hosted two sessions: in February 2025 on subsidies transparency, and in September 2025 on below-market financing provided by state banks.

7. SMALL AND MEDIUM-SIZED ENTERPRISES (SMES)

To assist small and medium-sized enterprises (SMEs) in overcoming their limited resources if impacted by or in need of the trade defence instruments, the European Commission extends comprehensive support and guidance to SMEs, whether they are EU producers, exporters, or importers.

In 2025, the Commission continued its outreach programme aimed at raising awareness about these instruments. To maximise audience reach, the Commission used existing networks by presenting trade defence information at Access2Market (A2M) events in March and December 2025 as well as Market Access Day event in Romania. These well attended events receive positive feedback.

Despite challenges presented by limited resources, SMEs were actively involved in some new and completed cases in 2025. Among the newly launched investigations in 2025, the AD investigations opened on cast iron articles and welding wire both concerning China, featured SMEs. Of the completed cases in 2025, SMEs featured in such cases as screws without heads, hardwood plywood and candles, all concerning China.

8. INFORMATION AND COMMUNICATION ACTIVITIES/ BILATERAL CONTACTS

Against a background of increasing demand for trade defence action coupled with complex global supply chains, improving transparency and engaging with stakeholders is crucial to foster greater understanding of the needs, obligations and limitations relating to the trade defence instruments. In that vein, the Commission participated in various information sharing activities in 2025.

The Commission engaged throughout the year with many stakeholder and national industry associations including Business Europe, AEGIS Europe, France Industrie, the steel industry, Europe Aluminium, CEFIC, German Chemical Industry Association and France Chimie to hear the views and concerns of interested parties. The many contacts with the chemical industry are indicative of the increasing pressure in that sector and the trade defence services are also participants in the Critical Chemical Alliance set up in October 2025. There was also engagement with Civil Society Dialogue on trade defence issues in November 2025. In addition, the Commission also participated in a few TDI related initiatives in the European Parliament (EP) including addressing a study commissioned by INTA on the EU's trade defence instruments as well as participating in July at an EP FORUM Roundtable: Strengthening the EU Trade Defence Toolbox, an event organised by the EP in conjunction with AEGIS.

The Commission attended the Seoul Economic Trade Remedies Forum, in June 2025, which is an annual gathering of Heads of Investigating Trade Remedies Authorities. This included a general conference, where trade remedy cooperation and technical aspects were discussed followed by several bilateral meetings with partner countries. In December 2025 there were further exchanges with the Director-General for Multilateral Trade and Legal Affairs, from the Ministry of Trade, Industry and Resources (MOTIR) of the Republic of Korea on the EU's TDI policy and cases involving Korean companies as well as exchange of views on the proposal for the EU new steel measure.

In September 2025, at the request of the Icelandic authorities, the Commission explained AD and AS investigations. This was prompted by an application by industry to the Icelandic authorities for anti-dumping and anti-subsidy investigations. DG TRADE delivered targeted training covering all the key elements for conducting such investigations.

II EU IMPORT SURVEILLANCE TASK FORCE

1. Background

With EU trading partners imposing an increasing number of restrictive measures, there is growing concern that goods originally destined for non-EU markets are redirected to the EU. When such shifts happen at significant levels, the increase of imports may have detrimental consequences for EU industry and the EU internal market.

To address these challenges, on 7 April 2025, European Commission President Ursula von der Leyen announced the creation of an import surveillance task force. The primary role of this task force is to inform decisions and actions to protect the EU internal market. To ensure that action to address potential harmful effects of trade diversion is proportionate, targeted and evidence based, the task force uses a data-driven approach to quickly identify surges in imports, and complements the findings with relevant information - notably from EU industry, but also Member States and experts - to understand their implications.

2. Methodology

The data analysis relies on an automated tool developed by Commission experts[2], utilising data from the customs surveillance system[3]. It monitors import trends on a monthly basis at the very detailed level of 8-digit codes in the combined nomenclature. The tool considers imports from all origins because the complexity of the measures and counter-measures imposed may result in surges from unexpected origins. The analysis compares import

[2] Participating DGs were the Directorates-General for Trade and Economic Security (DG Trade), Taxation and Customs Union (DG Taxud), and Joint Research Centre (JRC) supported by Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) and Agriculture and Rural Development (DG AGRI).

[3] https://taxation-customs.ec.europa.eu/online-services/online-services-and-databases-customs/surveillance-system_en

volumes starting from early 2025 with historic trends and flags codes exhibiting “surges”, i.e. atypically high increases in comparison to what is expected. The tool then applies additional criteria to select product codes which may be at risk of harmful import increases. Product codes presenting surges appear in the results (“hits” list) if, compared to the same period of the previous year, there is a significant increase in imports at reduced prices, specifically for products produced within the EU. These criteria balance the need to identify relevant results with avoiding an overflow of insignificant data.

However, identifying these surges is just the first step. To activate the EU's trade defence instruments, there must be evidence that these imports are causing injury to EU industries. Therefore, for any trade defence investigation to be initiated, the collaboration of EU industries is required as they can provide crucial data needed for action.

3. Results

Results are published monthly together with an explanatory note providing context. The analysis is dynamic due to seasonal patterns, historical variation, and in certain cases, revisions of import data. Furthermore, the ever-changing trade measures continually alter the factors driving trade diversion. Therefore, it is important to focus on trends rather than short-term fluctuations.

The initial report was released in June 2025, providing an analysis of data up to April 2025. Each subsequent monthly report incorporated data for an additional month; for instance, the ninth report, published in February 2026, included data up to and including December 2025([4]).

Textiles and apparel, chemicals, and the interrelated categories of machinery and metals are the most prevalent sectors, accounting for 21%, 14% and 12 and 10% of the codes included in the results, respectively.

The results are also summarised in a heatmap, which presents the frequency of ‘hits’ per industry sector and key trading partner (or group of partners[5]). Again, chemicals, machinery, and textiles (both specifically from China and worldwide) are the sectors most frequently flagged.

4. Industry feedback and outreach

Engagement and cooperation with EU industry are essential to complement the results of the monitoring and show whether imports harm EU industries. DG Trade facilitated the collection of relevant information, through a dedicated questionnaire and a functional mailbox where stakeholders can request and submit information. Furthermore, the import surveillance task force actively reached out to EU and national industry associations to explain the results, and

Results prior to 6th edition adjusted to include only “hits” that conformed to limit for average weekly value of EUR 200.000 EUR, applicable as of that edition

[5] For technical reasons, the Commission limited the (groups of) origins displayed to: ASEAN, Canada, China, EFTA, India, Japan, Mercosur, Mexico, Russia, South Korea, Türkiye, Taiwan, the United Kingdom, and the United States.

to inform about the possibilities and conditions for trade defence action. Industry stakeholders have welcomed the monitoring, and some have provided further information for the Commission services to assess.

5. Next steps

The import surveillance task force provided insights into import trends and identified potentially harmful import surges for certain products. It initiated discussions with industry, raised awareness and enhanced knowledge of the EU's trade defence toolbox and its procedures and legal requirements.

The task force’s results are not a ready-made list of products on which the Commission would take trade defence actions. To meet the legal requirement of injury to the EU industry caused by imports and qualify for protection, EU industry must actively cooperate with the Commission and complement the Commission’s analysis with their market knowledge and injury data. In this spirit, the task force has continuously engaged with stakeholders and sought to refine the methodological approach where needed.

Exchanges with industry and Member States show that stakeholders’ concerns have shifted from short-term trade diversion to the broader, longer-term import pressure driven by global overcapacities, notably from China. The initial focus on short term surges was justified by the immediate risk of trade diversion created by tariff increases after “liberation day” announced by President Trump. The subsequent de-escalation of tariffs should have eased the incentive to divert trade to EU and reduced import pressure. Yet, industry stakeholders report of increasing import pressure driven by overcapacities abroad. However, as opposed to abrupt surges, this import pressure is broad-based, and mounts gradually across several sectors. To identify such import pressures causing potential harm to EU industry, the Commission will adapt the methodology during 2026 to capture continuous, longer-term increases in imports, rather than focusing on short term surges caused by tariff driven trade diversion.