

ICC Global Trade Update

29 April 2025

DISCLAIMER – Given the fast-moving trade policy environment, please ensure that latest developments have been taken into account in your operations and communications.

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IMF AND WTO - TRADE OUTLOOK

Trade forecasts

- On the margins of the World Bank Group/IMF Spring Meetings, the IMF published an update to its [World Economic Outlook](#), revising global growth forecasts downward compared with January to reflect the impact of U.S. tariff policy and volatile geopolitics.
- The WTO's latest [Global Trade Outlook](#) tells a similar story with world goods trade predicted to fall by 0.2% in 2025 with significant downside risks. Services trade is likely to be less impacted and is predicted to grow 4% in 2025 (although down from previous estimates of 5%).

U.S. TARIFFS LATEST

Clarity on tariff stacking and easements for automotive tariffs

- On 29 April, President Trump issued two new executive orders:
 - The [first](#) provides clarity – previously indicated by several U.S. government agencies - that for Canada, Mexico and Section 232 tariffs on steel, aluminium and automotive products, the tariffs do not “stack”. It also sets out which tariff will apply. This order does not apply to tariffs on Chinese products.
 - The [second](#) sets out certain easements for tariffs on automobiles parts for automobiles that undergo final assembly in the U.S.

U.S. negotiations with trading partners underway during 90-day pause

- While the global 10% baseline tariff has now gone into effect, President Trump announced a 90-day pause on the country-specific “reciprocal” tariffs on 9 April.
- Since 9 April, there have been talks between U.S. trade officials and delegations from India, Japan, South Korea, Vietnam, United Kingdom and others.
- Talks with India have resulted in the establishment of a [Terms of Reference for a Bilateral Trade Agreement](#). The high-level document identifies tariffs, technical barriers to trade, and services market access as priorities for the negotiations.

U.S. fees on Chinese shipping

- On 17 April, the U.S. government issued its final ruling in the [Section 301](#) investigation on China’s maritime, logistics, and shipbuilding sectors. Following significant public consultation, the proposed fees have been set at \$0 for the first 180 days. From day 181, the following fees will apply:
 - Fees on vessel owners and operators of China based on net tonnage per U.S. voyage, increasing incrementally over the following years
 - Fees on operators of Chinese-built ships based on net tonnage or containers, increasing incrementally over the following years
 - To incentivize U.S.-built car carrier vessels, fees on foreign-built car carrier vessels based on their capacity
- The fees will not apply to restrictions to liquefied natural gas vessels for three years but will then increase incrementally over a 22 year time period.

- USTR is also seeking public comments on proposed tariffs on ship-to-shore cranes and other cargo handling equipment, with the comment period open until 8 May 2025.

New Section 232 investigation

- On 23 April, the Department of Commerce launched a new Section 232 [investigation](#) into imports of medium-duty trucks, heavy-duty trucks, and truck parts. The public comment period is open until 16 May 2025.

Business support measures

- **Canada:** The Canadian government has announced a significant [package of support](#) for Canadian businesses impacted by U.S. tariffs. Measures include: certain easements allowing automakers to import a limited number of U.S.-assembled USMCA-compliant vehicles into Canada without facing retaliatory measures; temporary six-month relief for goods imported from the U.S. that are used in Canadian manufacturing; and the launch of new Large Enterprise Tariff Loan Facility.
- **Spain:** On 8 April, the government of Spain approved a Royal Decree-Law creating a [Trade Response and Relaunch plan](#) to offset the impact of U.S. tariffs on the Spanish economy and support Spanish companies seek new markets and improve their international presence.
- **China:** The Political Bureau of the CPC Central Committee held a [meeting](#) on 25 April, setting out steps to support Chinese exporters and broader economic measures to promote domestic consumption. The meeting also reportedly discussed acceleration of pilots liberalising China's services sector and promoting Chinese services companies internationally. There are also reports that China Customs has waived retaliatory tariffs for certain semiconductors and component parts.

Brazil enacts "Economic Reciprocity Law"

- On 14 April, Brazil enacted Law No. 15,122 known as the [Economic Reciprocity Law](#). The text gives the Brazilian government the powers to respond recent U.S. tariff policy and establishes criteria for the suspension of trade, investment and intellectual property rights concessions. The law sets out that any countermeasures must aim to minimise the impact economic activity and avoid onerous administrative costs.

Vietnam imposes new rules for origin

- On 15 April, the Vietnamese Ministry for Trade and Industry [issued](#) a new directive (No. 09/CT-BCT) to strengthen the inspection and supervision of product origin and prevent Vietnam from being used as a location for fraud and transshipment.

Practical business considerations

- The level of trade uncertainty and tariffs is at a historic high since 1945. While this uncertainty will certainly impact many businesses, there are proactive steps businesses can take now to mitigate some of the uncertainty.
- Businesses will need to pay closer attention to the origin of their products exported to the U.S., ensure they have the necessary customs approvals in place for U.S. imports, and determine whether imported products contain U.S. content (starting at 20%) to see if some of the new tariff cost can be offset.
- Businesses should remain vigilant to potential changes to U.S. tariff rates and retaliation from trading partners.

FREE TRADE AGREEMENTS

ASEAN-Australia-New Zealand Free Trade Area

- On 21 April 2025, the [Second Protocol to Amend the Agreement Establishing the AANZFTA](#) came into force and is effective for Australia, Brunei Darussalam, Lao PDR, Malaysia, New Zealand and Singapore.
- The upgraded AANZFTA improves existing tariff preferences and new services trade commitments. It also introduces three new chapters on MSMEs, Government Procurement and Trade and Sustainable Development commitments.

Nigeria submits ECOWAS tariffs under AfCFTA

- Nigeria has published its Provisional Schedule of Tariff Concessions (PSTCs) under the African Continental Free Trade Area (AfCFTA). Dr Jumoke Oduwole, Minister of Industry, Trade and Investment, made the announcement via [X](#).

WORLD TRADE ORGANIZATION

WTO disputes

- The WTO's Dispute Settlement Body has [established](#) a panel at the request of China to review the EU's countervailing duties on Chinese electric vehicles.

- Separately, the EU has [appealed](#) the WTO panel report in its WTO dispute with China on the Enforcement of Intellectual Property Rights (DS 611). The appeal will take place under the framework of the Multi-Party Interim Appeal Arbitration Agreement (MPIA).

WTO Members discuss impact of AI

- The WTO held a meeting of the Work Programme on E-commerce on 16 April where WTO Members discussed the recent WTO report on [Trading with intelligence: How AI shapes and is shaped by international trade](#). The next meeting of the Work Programme will focus on the moratorium on customs duties on electronic transmissions – an important topic ahead of the next WTO Ministerial Conference in March 2026.



Help shape the WTO's Annual World Trade Report and a forthcoming joint ICC-WTO publication by sharing your views on how AI is transforming the trade landscape. The survey is closing soon – share your views [here](#).

CARBON BORDER ADJUSTMENT MECHANISM

United Kingdom

- On 24 April, the UK government published its draft primary legislation for a UK Carbon Border Adjustment Mechanism (UK CBAM) which is due to enter into force from 1 January 2027. The legislation would introduce new fees and carbon emissions reporting obligations on a range of products, including steel, aluminium, and concrete. While it closely tracks previous policy announcements, additional clarity has been provided around several administrative considerations, including group treatment, accounting, and payment periods.
- The draft legislation is open for technical consultation until 3 July 2025. The relevant documents can be found [here](#).

EUROPEAN UNION

EU Deforestation Regulation

- On 15 April, the European Commission published their decision to further simplify the implementation of the EU Deforestation Regulation. The measures include:
 - Allowing large companies to reuse existing due diligence statements when goods, previously on the EU market, are reimported Permitting an authorised

representative to submit a due diligence statement on behalf of members of company groups.

- Allowing companies to submit due diligence statements annually, instead of for every shipment or batch placed on the EU market.
- Clarifying the meaning of 'ascertaining' that due diligence has been carried out, thereby simplifying obligations for downstream companies.
- The European Commission is also consulting on a draft Delegated Act designed to provide additional clarity on the product scope of the EU Deforestation Regulation. The consultation is open until 13 May 2025 and can be found [here](#).

ICC IN THE NEWS

- 28 April 2025 – Financial Times, [Demand slump fuelled by Trump tariffs hits US ports and air freight](#)
- 25 April 2025 - [Times Radio Drive with Lara Spirit](#), Interview: John Denton, ICC Secretary General

ICC NEWS AND PUBLICATIONS

- [ICC: Pulse Survey 2025 – Business reaction to new U.S. tariffs.](#)
- [ICC: Using the Incoterms® 2020 Rules to Manage Tariff Risk in International Trade.](#)
 - This new guide offers practical insights into how businesses can use the Incoterms® 2020 Rules to reduce exposure to unexpected changes in tariffs.
 - It covers: Why the Incoterms® 2020 Rules matter in a volatile tariff environment; a breakdown of who pays the tariff according to Incoterms® rules and transport methods; and Practical use of the Incoterms® 2020 Rules in times of tariff volatility.
- [ICC: Key takeaways from the first ICC WCF Africa Summit 2025.](#)

WHAT WE'RE READING

- The Hinrich Foundation has published the [survey results](#) on WTO Reform. In their own words, the survey results show “an overwhelming proportion of respondents agreeing with the need for the urgent reform of the WTO and its governance.”
- DHL's [Global Connectedness Tracker 2025](#) which highlights the resilience of international flows in the face of geopolitical tensions.
- The WTO's Chief Economist Ralph Ossa's latest [blog](#) on the impact of tariffs on global trade flows.

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