



ECONOMIC
LAWS
PRACTICE
ADVOCATES & SOLICITORS



TRADE NEWSLETTER:
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I. TRADE REMEDIAL INVESTIGATIONS UPDATES

A. TRADE REMEDIAL ACTIONS BY INDIA

During April 2026, the Directorate General of Trade Remedies (**DGTR**) initiated one countervailing duty investigation and issued two final findings in anti-dumping investigations. Further details are set out below:

PRODUCT	SUBJECT COUNTRIES IN THE INVESTIGATION	TYPE OF INVESTIGATION	TYPE OF NOTIFICATION	DATE OF THE NOTIFICATION
Normal Butanol or N-Butyl Alcohol	Malaysia, South Africa and United States of America	Anti-dumping, Sunset Review	Final Finding	April 09, 2026
Aluminium Wire in coil form or wire rod in coil form having diameter ranging from 9 mm to 13 mm	Malaysia	Countervailing Duty, Sunset Review	Initiation	April 27, 2026
Low Ash Metallurgical Coke	Australia, China PR, Colombia, Indonesia, Japan and Russia	Anti-dumping	Final Finding	April 28, 2026

B. TRADE REMEDIAL ACTIONS AGAINST INDIA

During April 2026, trade remedy actions concerning Indian exports were observed in the United States of America (**USA/US**) while no major developments were noted in trade remedial investigations involving India in other jurisdictions, such as the United Kingdom (**UK**) and the European Union (**EU**). Further details of the individual cases are provided below:

PRODUCT	COUNTRY	TYPE OF INVESTIGATION	TYPE OF NOTIFICATION ¹	DATE OF THE NOTIFICATION ²
Commodity Matchbooks	USA	Countervailing duty, Review	Final Results	April 10, 2026
Commodity Matchbooks	USA	Antidumping duty, Review	Final Results	April 10, 2026
Forged Steel Fittings	USA	Countervailing duty, Review	Final Results	April 15, 2026
Forged Steel Fittings	USA	Antidumping duty, Review	Final Results	April 15, 2026
Prestressed Concrete Steel Wire Strand	USA	Countervailing duty, Review	Final Results	April 10, 2026
Carbon and Alloy Steel Threaded Rod	USA	Anti-dumping, Administrative Review	Final Results	April 10, 2026
Prestressed Concrete Steel Wire Strand	USA	Antidumping duty, Review	Final Results	April 10, 2026
Forged Steel Fluid End Blocks	USA	Countervailing duty, Review	Final Results	April 15, 2026

¹ The information is based on notifications published in the Federal Register during April 2026. Any institutions or determinations issued by the US Department of Commerce or the US International Trade Commission that were not published in the Federal Register during this period are not reflected.

² The date of notification is based on the date of publication in US Federal Register.

II. REGULATORY DEVELOPMENTS IN TRADE IN INDIA

A. MINISTRY OF FINANCE (MoF)

Pursuant to the absence of any final finding recommending anti-dumping or countervailing duties from the DGTR in the month of January 2026, no such duties were required to be imposed by the MoF in April 2026.

However, the MoF issued several customs and certain trade remedy-related notifications. Key trade policy changes issued by the MoF in April 2026 are summarized below:

Notification 12/2026-Customs dated April 01, 2026 – Grants a nil basic customs duty rate (by way of exemption over the First Schedule rate) for a specified list of petrochemical and polymer products (e.g., anhydrous ammonia, methanol, styrene, PVC, PTFE, PET chips, polyurethanes, PPS, SBR) under Chapters 28, 29, 31, 38, 39 and 40, with effect from April 02, 2026 up to and including June 30, 2026.

Notification 13/2026-Customs dated April 01, 2026 – Exempts ammonium nitrate (HS 3102 30 00) from Agriculture Infrastructure and Development Cess (AIDC) by prescribing a nil rate, effective from April 02, 2026, till June 30, 2026.

Notification 04/2026-Customs (ADD) dated April 08, 2026 – Amends Notification 15/2023-Customs (ADD) on “Industrial Laser Machines” from China PR to reflect a change of name of a cooperating producer; against serial number 5 in the duty table of the Notification 15/2023-Customs (ADD), the producer name “Bystronic (Shenzhen) Laser Technology Co., Ltd” is replaced with “DNE LASER (Guangdong) Co., Ltd.” without altering the applicable duty rate.

Notification 05/2026-Customs (ADD) dated April 17, 2026 – Narrows the scope of anti-dumping duty on “Certain Flat Rolled Products of Aluminium” from China PR by inserting a specific exclusion in Notification 68/2021-Customs (ADD), namely that “Lithograde Aluminium Coils of width above 1150 mm” are excluded from the product under consideration and thus from the levy.

Notification 06/2026-Customs (ADD) dated April 30, 2026 – Amends five existing anti-dumping duty notifications (31/2021, 60/2021, 12/2022, 23/2024 and 17/2025-Customs (ADD)) to update and expand the covered HS codes (e.g., splitting/adding specific eight-digit lines, so that the ADD coverage aligns with subsequent tariff reclassification, with the amendments coming into force from May 01, 2026.

Notification 14/2026-Customs dated April 30, 2026 – Makes extensive HS-code alignment amendments across a large suite of basic customs exemption notifications (including 85/2004, 24/2005, 25/2005, 73/2005, 74/2005, 75/2005, 101/2007, 10/2008, 57/2009, 46/2011, 53/2011, 69/2011, 68/2012, 57/2017, 11/2018, 50/2018, 25/2021, 22/2022, 62/2022, 41/2025, 42/2025, 43/2025 and 11/2026-Customs), primarily by substituting old single HS lines with sets of new split lines and, for Notification 11/2026-Customs, revising certain tariff-rate entries (e.g., for Chapters 33, 41, 48, 81, 84, 85 and 85.29/86.01–86.09); all such amendments take effect from May 01, 2026.

Notification 01/2026-Customs (CVD) dated April 30, 2026 – Amends Notification 04/2024-Customs (CVD) by replacing the single HS code 7305 11 29 with the HS codes 7305 11 41 and 7305 11 49 wherever it appears, thereby aligning the scope of the countervailing duty with the restructured tariff headings from May 01, 2026.

ELP COMMENT:

Policy activity was concentrated on (i) temporary fiscal relief for critical inputs (notably petrochemicals and ammonium nitrate through time-bound BCD/AIDC exemptions) in light of the ongoing conflict in West Asia and the consequent global supply chain disruptions, and (ii) technical realignment of existing customs and trade remedy notifications with updated HS classifications

B. DIRECTORATE GENERAL OF FOREIGN TRADE (DGFT)

Key trade policy changes issued by the DGFT in April 2026 are summarized below:

Notifications

Notification 01/2026-27 dated April 01, 2026 – Permits export of specified quantities of eggs, potatoes, onions, rice, wheat flour, sugar, dal, stone aggregate and river sand to Maldives during FY 2026-27 under the bilateral agreement, exempting these exports from any existing or future restrictions/prohibitions, with additional environmental and certification conditions for sand/aggregate and eggs.

Notification 02/2026-27 dated April 01, 2026 – Revises import policy of jewellery items under CTH 7113 from “Free” to “Restricted” with immediate effect, with no transitional benefit, while exempting 100% export-oriented units, special economic zone units and Chapter-4 gems & jewellery export schemes from these restrictions.

Notification 03/2026-27 dated April 02, 2026 – Revises import policy and policy conditions for specified Chapter 71 items, making several lines “Restricted”, with restrictions applying notwithstanding the Foreign Trade Policy (FTP) transitional provisions.

Notification 04/2026-27 dated April 06, 2026 – Revises export policy of wood pellets (HS code - 44013100) and wood briquettes (HS code - 44013200) from “Prohibited/Free” to “Restricted”, so exports are now permitted only under a Restricted Export Authorisation.

Notification 05/2026-27 dated April 07, 2026 – Amends Para 2.62 of FTP 2023 to clarify that Certificates of Origin (CoO) can only be issued by authorised agencies in the DGFT-prescribed manner and that exporters must use identical invoice numbers in CoO and Shipping Bills to enable automated verification.

Notification 06/2026-27 dated April 09, 2026 – Aligns the Remission of Duties and Taxes on Exported Products (RoDTEP) description for HS 73181500 in Appendices 4R and 4RE with the Customs Tariff description with effect from December 15, 2022.

Notification 07/2026-27 dated April 10, 2026 – Limits the requirement of Export Inspection Council (EIC/EIA) Certificate of Inspection for exports of Basmati and Non-Basmati rice to EU, UK, Iceland, Liechtenstein, Norway and Switzerland, and exempts exports to other European countries from this requirement for six months from the date of notification.

Notification 08/2026-27 dated April 10, 2026 – Revises export policy conditions for certain feather and skin products by aligning them with EU/UK regulations and requiring veterinary/shipment clearance and veterinary health certificates (issued by Chemical and Allied Products Export Promotion Council and Animal Quarantine Officer) where mandated by the importing country.

Notification 09/2026-27 dated April 10, 2026 – Extends the Minimum Export Price (MEP) of USD 1400 FOB per MT on exports of natural honey (HS code - 04090000) up to December 31, 2026.

Notification 10/2026-27 dated April 13, 2026 – For six months, imports of “Glufosinate and its salts” under specified Chapter 38 HS codes to be “Restricted” where the combined Cost, Insurance, and Freight (CIF) value and any anti-dumping duty is below INR 1,154 per kg.

Notification 11/2026-27 dated April 17, 2026 – Expands the list of eligible Resilience & Logistics Intervention for Export Facilitation (RELIEF) Component destinations to include Egypt and Jordan, so shipments for delivery or transshipment to these countries are also covered.

Notification 12/2026-27 dated April 17, 2026 – Amends export policy of baryte (natural barium sulphate), so that the Grade A (SG 4.2) and Grade B (SG 4.10–4.20) become “Restricted” (licence-based) while Grade CDW remains “Free”.

Notification 13/2026-27 dated April 27, 2026 – Keeps wheat under HS 10011900 and 10019910 “Prohibited” but permits export of an additional 25 LMT subject to modalities in a separate Public Notice, with the earlier food-security-based permission mechanism continuing over and above this quantity.

Notification 14/2026-27 dated April 30, 2026 – Extends the Minimum Import Price (MIP) of INR 67,220 per MT (CIF) on imports of Virgin Multi-layer Paper Board under specified Chapter 48 HS codes up to September 30, 2026.

Notification 15/2026-27 dated April 30, 2026 – Aligns the RoDTEP Schedules (Appendix 4R/4RE) with Customs Tariff changes w.e.f. May 01, 2026, with revised RoDTEP rates/caps published on the DGFT portal.

Public Notices

Public Notice 01/2026-27 dated April 07, 2026 – Mandates that authorized agencies issue CoO only through the designated electronic platform (trade.gov.in or as notified by DGFT), with manual issuance outside the platform impermissible.

Public Notice 02/2026-27 dated April 10, 2026 – Invites applications and lays down the procedure and conditions for allocation of FY 2026-27 import quotas for calcined petroleum coke and raw petroleum coke.

Public Notice 03/2026-27 dated April 10, 2026 – Extends the last date for filing FY 2026-27 tariff-rate-quota (TRQ) applications under India-Mauritius Comprehensive Economic Cooperation and Partnership Agreement (CECPA) and the India-Nepal Treaty to April 25, 2026.

Public Notice 04/2026-27 dated April 17, 2026 – Updates Appendix 4B by notifying the revised list of banks authorised by Reserve Bank of India (RBI) to import gold and silver (Part A) and those authorised to import only gold (Part B) for the period April 01, 2026, to March 31, 2029.

Public Notice 05/2026-27 dated April 30, 2026 – Provides that applications for export authorisations for the additional 25 LMT of wheat allowed under Notification 13/2026-27 will be invited and processed strictly as per the modalities laid down in this Public Notice.

Trade Notices

Trade Notice 01/2026-27 dated April 20, 2026 – Clarifies that newly added Chapter 72 tariff lines in Annexure-IIA are eligible for Export Promotion Mission Interest Subvention only for Micro and Small Enterprises, with Medium Enterprises excluded and eligibility applying prospectively to export credit disbursed on or after the date of the notice.

Trade Notice 02/2026-27 dated April 21, 2026 – Activates an online module for issuance, re-issuance and validity extension of Post-Export Export Promotion Capital Goods (EPCG) duty credit scrips, enabling electronic transmission to ICEGATE and prescribing scenarios and procedures for closure and conversion of manual scrips.

Trade Notice 34/2026-27 dated April 01, 2026 – Extends the special drive for expeditious issuance of Export Obligation Discharge Certificates (EODC) under Advance Authorisation (AA) and EPCG schemes up to May 31, 2026, with a focus on older and deficient applications and an expectation of time-bound closure and consequent customs bond/BG release.

Policy Circulars

Policy Circular No. 01/2026-27 dated April 15, 2026 – Clarifies that under RELIEF Component II, exporters who obtain a new Export Credit Guarantee Corporation (ECGC) Whole Turnover Policy for the first time on or after March 16, 2026, are also eligible for support, with all other provisions of Notification 65/2025-26 remaining unchanged.

III. GLOBAL TRADE REGULATORY DEVELOPMENTS

A. EUROPEAN UNION (EU)

- **European Commission imposes provisional anti-dumping duties on imports of terephthalic acid originating in the Republic of Korea and the United Mexican States**

The investigation was initiated on August 13, 2025, on Terephthalic Acid (TA) (CN code ex 2917 36 00) following a complaint by INEOS (Belgium).

The EU has provisionally confirmed significant dumping of TA particularly from Mexico and found strong evidence of injury driven by rising low-priced imports. This has led to closures, sustained losses, and declining market share for EU producers.

Sampling was undertaken for Korean producers only as the Mexican producers did not cooperate. The duties imposed on Korean producers ranged from 0-13.7% whereas none of the Mexican producers were declared cooperative and a penal rate of 75.5% was imposed.

- **New Generalized Scheme of Preferences (GSP) approved; to be applicable from January 2027**

The EU Parliament has voted in favour of the new GSP which will provide reduced or zero tariffs to imports from 65 developing countries for the next decade. India will continue to benefit from standard GSP preference for two more years after the Free Trade Agreement starts to apply, following its ratification. Thereafter, it will graduate out of the scheme completely.

In accordance with the updated GSP, full duty-free access to world's Least Developed Countries (LDCs) will continue to be provided as per the "Everything But Arms (EBA)" initiative.

The updated GSP links trade benefits more closely to human and labour rights, climate and environment, and good governance in accordance with the international conventions.

Further, in the updated GSP, an automatic safeguard on rice imports has been included to protect domestic EU producers. So, if imports from a beneficiary (LDC) rise sharply above the average of their past imports over 10 years, preferential rates for the rest of the year shall be suspended and a TRQ for the following year shall be introduced.

- **EU and US signed a Memorandum of Understanding (MoU) on a strategic partnership on critical minerals (EU-US Critical Minerals Action Plan)**

The MoU aims to achieve bilateral cooperation across the full value chain i.e., exploration, extraction, processing, refining, recycling and recovery through innovation and investment along with demand and supply side measures.

In furtherance to the MoU, an Action Plan for Critical Minerals Supply Chain Resilience was set to explore a broad range of trade policies and instruments to reinforce coordinated international action such as border-adjusted price floors, standards-based markets, price gap subsidies and offtake agreements.

The MoU also aims to focus on developing common standards for mining, processing and recycling, promoting innovation, research, investment, strategies for stockpiling and supply disruptions.

- **European Parliament and European Council agree on measures to protect the EU steelmaking sector against global overcapacity**

The steel safeguard introduced in July 2018 to prevent injury to EU steel producers from trade diversion and rising imports is set to expire in June 2026. The safeguard measure had imposed a TRQ on 28 product categories with 50% tariff beyond quota limits. The European Commission had in March 2025 adopted a [Steel and Metals Action Plan](#) that outlined actions across different policy areas including a trade measures to replace the [steel safeguard](#).

In furtherance of the Steel and Metals Action Plan, the European Parliament and Council have reached a political agreement on the text that sets tariff-free quotas at 18.3 million tonnes per year, with an out-of-quota duty set at 50% for 30 categories of steel products imported into the EU besides introducing 'melt & pour' requirements.

Over the coming weeks, the European Parliament and the Council will formally adopt the agreed text, paving way for its timely implementation by July 01, 2026. Parallely, the European Commission continues to draft requirements regarding country allocation quotas and the evidentiary requirements needed to meet the 'melt & pour' criteria.

▪ **The European Commission imposes definitive dumping duty in glassfiber and softwood plywood cases**

Anti-dumping duties were imposed on the imports of softwood plywood from Brazil at 5.4% for all Brazilian exporters except for one company. Provisional duties at the same rate had already been imposed on 04 November 2025. The total EU consumption value of softwood plywood is estimated to stand at €600 million per year, of which €216 million is imported from Brazil. The overall value of imports from outside the EU is €352 million.

Anti-dumping duties were imposed on imports into the EU of continuous filament glass fibre (GFR) from Egypt (11%), Bahrain (11%) and Thailand (15.3% - 25.4%). This is causing injury to the EU's glass fibre industry, which is located throughout the bloc (notably in Belgium and Slovakia) and employs 2,500-3,000 people. Total EU consumption of GFR is estimated to stand at one million tonnes per year, of which 200,000 tonnes are imported from Egypt, Bahrain and Thailand.

B. UNITED STATES OF AMERICA (USA)

▪ **USA announces tariffs on imported patented medication (IPM) and active pharmaceutical ingredients (API) under Section 232 of the Trade Expansion Act of 1962**

- The proclamation was issued on April 02, 2026 imposing sweeping tariffs on IPM and APIs. These are to take effect from 12:01 a.m. EDT on July 31, 2026, for companies that have not committed to onshore production, and September 29, 2026, for other companies. The investigation in this regard was initiated by the Secretary of Commerce on April 01, 2025.
- The proclamation was issued to address USA's dependence on imports of key pharmaceutical inputs. The tariffs have been structured to 'incentivize' onshoring of critical manufacturing base to the USA.
- The tariff structure is briefly described below –

A company-specific tariff where reduced tariff rate of 20% be awarded to companies that commit to onshoring pharmaceutical production in USA. However, the tariff shall increase progressively reaching up to 100% by 2030 if the company did not fulfil onshoring commitments by then.

Companies that agree to Most-Favoured-Nation (MFN) pricing commitments under which they align drug prices in the USA with the lowest prices offered in comparable foreign markets may qualify for a zero-tariff rate on imports till January 2029.

Tariff-differentiation has also been imposed based on the country of origin. For example, imports originating in the EU, Japan, Korea, and Switzerland/Liechtenstein are subject to a tariff of approximately 15% whereas imports from UK may be subject to a tariff of 10% with the possibility of further reductions under future trade arrangements.

The implementation of this proclamation has also been phased in two parts. For large companies, the obligations shall kick-in from July 31, 2026, and from September 29, 2026, for remaining entities.

▪ **President Trump issues a proclamation amending Section 232 of Trade Expansion Act of 1962, duties on steel, aluminum, and copper, and derivative products (“Goods”)**

- Any goods entered for consumption or withdrawn from warehouse on or after 12:01 a.m. eastern daylight time on April 06, 2026, the Section 232 tariffs shall apply as follows –
 - Tariffs now apply to the full entered value of covered products, regardless of metal content, reversing prior approaches that often-applied duties only to metal content for derivatives.
 - The proclamation reorganizes products into multiple Annexes with different duties as follows -

<p>Annex I-A: - 50% ad valorem on steel, aluminum, and copper products (mainly HTS Chapters 72, 73, 74, and 76). However, UK origin products may receive reduced duties (about 25%) subject to conditions.</p>	<p>Annex I-B (Derivatives): - 25% duty generally, 15% for qualifying UK products and 10% for qualifying US-origin metals.</p>	<p>Annex II: - Products listed herein shall not be subject to the <i>ad valorem</i> duty rates imposed by earlier Proclamations (97704 and 9705).</p>	<p>Annex III: - Goods listed herein shall until December 31, 2027, be subject to a combined 15% total rate if the MFN rates are below 15%. For products already at or above 15%, no additional duty under Section 232 be levied. However, 25% duty applies to goods from countries without normal trade relations with the USA.</p>
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- Some other highlights of the proclamation are as follows –

<p>Russian origin aluminum remains unchanged at 200% levy.</p>	<p>Products outside HTS Chapters 72, 73, 74, and 76 that contain less than 15% steel, aluminum, or copper are excluded from the tariffs.</p>	<p>In case of multi-metal articles, only one Section 232 rate applies.</p>	<p>The Secretary of Commerce and Office of the United States Trade Representative may jointly add new derivative products if imports are deemed to threaten national security including metal containers even if filled with non-metal goods.</p>
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- The Proclamation does not override existing Section 232 agreements with partners such as the UK, EU, Japan, South Korea, Canada, and Mexico. However, benefits may be revoked for a trading partner if derivative imports undermine US trade objectives.

C. UNITED KINGDOM (UK)

Trade Remedies Authority sets out three-year plan to defend UK businesses from unfair trade

- In accordance with the Secretary of the State's strategic steer for a more accessible, agile, assertive and accountable trade remedies system, the Trade Remedies Authority (TRA) has published its plan for 2026 to 2029 setting out how it will protect UK businesses from unfair international trading practices such as dumping and subsidies.
- The plan sets three strategic objectives: Robust Defence, Trusted Authority, and Operational Excellence. Together, these will guide how the TRA works over the next three years by delivering faster, more proportionate investigations while maintaining the quality and independence.
- The TRA will also make it easier for UK businesses, particularly small and medium-sized enterprises, to access the trade remedies system.

TRA proposes new measure on South Korean hot rolled steel plate

- The TRA has proposed a new anti-dumping measure be imposed on imports of hot rolled steel plate from South Korea as the investigation that began on June 06, 2025, approaches its final phases.
- The TRA has identified the following options:

A measure could be imposed only on plates over 600mm but less than 2500mm in width – this is the TRA's preferred option.

Or an anti-dumping measure could be placed on all the products in scope of the investigation – that being all plates over 600mm in width.

- In its Economic Interest Test, the TRA found that imposing an anti-dumping measure on the full scope (all plates over 600mm in width) would likely harm UK downstream sectors such as renewable energy, ship building and defence who are heavily reliant on imports due to insufficient domestic production.
 - If the new anti-dumping measure is applied only to plates less than 2500mm in width, the duties would range from 7.04% to 22.27%. If applied to the full scope of the products investigated, the duties would range from 5.98% to 24.28%.
 - The due date for any public comments is May 21, 2026, and based on any additional evidence, the TRA shall make a final recommendation to the Secretary of State for Business & Trade.
- ### Expiry review of welded tubes and pipes from China reaches initial findings
- The TRA has published its proposed recommendation to extend the anti-dumping measure on imports of welded tubes and pipes from Belarus and China citing likely recurrence of dumping and consequent injury to the domestic industry. The review was initiated in January 2026.
 - The TRA recommended a five-year extension of residual duty of 38.1% for Belarusian exporters and a residual duty of 90.6% for all Chinese exporters.

ELP COMMENT:

- The USA continues to explore various legal tools to impose tariffs particularly through Section 232 to offset loss of revenue after the Supreme Court of the United States judged International Emergency Economic Powers Act as 'illegal'. The recent amendment to Section 232 duties on steel, aluminium, copper and its derivatives is likely to increase considerable difficulties for Indian businesses who have substantial exports (\$3bn in 2025) of engineering goods to the USA. The businesses will have to keep track of metal content in derivative goods increasing overall trade complexity and compliance risks. The industries particularly in sectors like steel, pharmaceuticals, automobiles, semiconductors, critical minerals, timber, energy related industrial products, etc., continue to remain under radar. It has become imperative for businesses who are heavily exposed to the US markets to keep a constant watch and align real-time to any changes and adjustments in tariffs and trade policies.
- The EU and UK continue to extend protection to their industries through trade-remedial measures while also aligning with the World Trade Organisation framework. Global overcapacity of steel and China's grip over critical minerals continue to dominate the policy-making space in international trade.

IV. TECHNICAL REGULATIONS & STANDARDS

A. TEMPORARY SUSPENSION OF THE MORPHOLINE (QUALITY CONTROL) ORDER, 2020

- On April 02, 2026, the Department of Chemicals and Petrochemicals, issued a notification temporarily suspending the operation of Morpholine (Quality Control) Order, 2020. The suspension will be in effect from April 01, 2026, to July 01, 2026.
- This measure has been undertaken in light of ongoing global exigencies causing disruptions in the supply chain of Morpholine.

B. EXTENSION TO THE IMPLEMENTATION OF SAFETY OF HOUSEHOLD, COMMERCIAL AND SIMILAR ELECTRICAL APPLIANCES (QUALITY CONTROL) ORDER, 2026

On April 06, 2026, the Department for Promotion of Industry and Internal Trade (**DPIIT**), issued a notification extending the timeline for the implementation of Safety of Household, Commercial and Similar Electrical Appliances (Quality Control) Order (**Electrical Appliances QCO**).

In this regard, a renewed Electrical Appliances QCO dated April 06, 2026, has been issued by the DPIIT, replacing the earlier Electrical Appliances QCO dated May 19, 2025. While most of the provisions of the renewed Electrical Appliances QCO remains unchanged from those contained in the May 2025 order, the timelines for the implementation of the Electrical Appliances QCO have been extended as follows:

INDIAN STANDARD (IS)	GOODS OR ARTICLES	DATE OF IMPLEMENTATION IN GENERAL (OTHER THAN MICRO AND SMALL ENTERPRISES)	DATE OF IMPLEMENTATION FOR SMALL ENTERPRISES	DATE OF IMPLEMENTATION FOR MICRO ENTERPRISES
IS 302 (Part 1): 2024 IEC 60335-1: 2020 – Household and Similar Electrical Appliances – Safety Part 1 General Requirements.	All electrical appliance intended for household, commercial or similar application with rated voltage not exceeding 250 V for single-phase appliances and 480 V for other appliances including direct current supplied	October 01, 2026 (Previously March 19, 2026)	January 01, 2027 (Previously June 19, 2026)	April 01, 2027 (Previously September 19, 2026)

	appliances and battery operated appliances.			
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C. TEMPORARY SUSPENSION OF THE N-BUTYL ACRYLATE (QUALITY CONTROL) ORDER, 2021

- On April 10, 2026, the Department of Chemicals and Petrochemicals, issued a notification temporarily suspending the operation of Morpholine (Quality Control) Order, 2020. The suspension will be in effect from April 10, 2026, to July 10, 2026.
- This measure has been undertaken in light of ongoing global exigencies causing disruptions in the supply chain of n-Butyl Acrylate.

ELP COMMENT:

In addition to the extension of timelines under the Electrical Appliances QCO, a minor but potentially significant change has been introduced. The earlier order issued in May 2025 referred to an “illustrative” list of covered electrical appliances, whereas the renewed order states that the “following list of electrical appliances is given below.” This change in language may require clarification from the DPIIT on whether the list is intended to remain illustrative or to be treated as exhaustive. The distinction is relevant, as it may influence the assessment of whether products not expressly listed fall within the scope of the QCO.

V. DEVELOPMENTS IN INDIA'S REGIONAL TRADE AGREEMENTS (RTAS)

During the month of April 2026, India was involved in various trade talks with different countries. The following developments highlight the progress and outcomes of these engagements:

India-New Zealand Free Trade Agreement

- On April 27, 2026, India and New Zealand signed the India-New Zealand FTA (FTA).
- The FTA provides duty-free access for 100% of India's exports to New Zealand, covering all tariff lines. The FTA includes a commitment of facilitating \$20 billion in investment into India.
- The FTA establishes a new Temporary Employment Entry Visa pathway for Indian professionals in skilled occupations, with a quota of 5,000 visas at any given time and a stay of up to three years.
- New Zealand has created a dedicated pathway on student mobility and post study work visas with India.
- The FTA streamlines access for pharmaceuticals and medical devices by enabling acceptance of GMP and GCP inspection reports from comparable regulators.
- As stated in the side letter to the FTA, New Zealand shall take all steps necessary to provide protection to any geographical indications nominated by India, including any legislative changes, with the aim to complete those steps within 12 months following the completion of the review (6 months after FTA enters into force) of the Geographical Indications section in the FTA.

India-US Bilateral Trade Agreement

- The negotiating teams of India and the US held talks between April 20-23, 2026, on finalizing the details of the Interim Agreement and taking forward the negotiations under the broader bilateral trade agreement.
- The two sides discussed multiple areas including Market Access, Non-Tariff Measures, Technical Barriers to Trade, Customs and Trade Facilitation, Investment Promotion, Economic Security Alignment and Digital trade.

India-Austria Joint Economic Commission

- The 17th Session of the India-Austria Joint Economic Commission was held on April 17, 2026.
- Both sides explored opportunities for cooperation across a range of sectors including infrastructure, scientific research and innovation, dual vocational training and other trade and business-related areas.

India-Austria Business Forum

- The India-Austria Business Forum was held on April 16, 2026.
- A bilateral Fast-Track Mechanism (**FTM**) was signed and made operational during the forum. The FTM provides a dedicated platform for Austrian companies and investors in India, as well as Indian companies and investors in Austria, to facilitate investments, address issues and ensure their timely resolution. It will also serve as a forum for sharing suggestions to further improve ease of doing business in both countries, reflecting the shared commitment to strengthening investor confidence.
- Discussions highlighted the importance of the India-EU FTA as a key enabler for scaling trade, reducing barriers and facilitating investment flows.

India-Norway Dialogue on Trade and Investment (DTI)

- The 3rd Session of the India-Norway DTI was held on April 16, 2026.
- Both sides reviewed the global and domestic economic outlook, noting the need for resilient supply chains, energy security, climate transition, and stronger trade and investment linkages in a period of geopolitical uncertainty.
- India highlighted the establishment of an EFTA Desk under Invest India to support EFTA businesses.
- Sectoral cooperation was explored across energy, skill development and mobility, maritime cooperation, pharmaceuticals and biotech, tourism, and MSMEs, including discussions on oil and gas, offshore technologies, renewable energy, green hydrogen, low-carbon solutions, digitization of port operations, sustainable shipping practices, and enhanced collaboration in services, education, and medical sectors.
- Norway also stated that it is actively promoting investment opportunities in India to its business community and highlighted growing investment interest, including through the Government Pension Fund Global and Norfund's investments in renewable energy projects.

India-Kenya Bilateral Trade and Economic Cooperation

- The 10th Session of the India-Kenya Joint Trade Committee (**JTC**) was held on April 27 – 28, 2026, to review and strengthen bilateral trade and economic cooperation between the two countries.
- The JTC reviewed progress on the MoU between the Bureau of Indian Standards and the Kenya Bureau of Standards to promote cooperation in standardisation and conformity assessment.
- The JTC also saw the signing of an MoU between the India's Central Board of Indirect Taxes and Customs and the Kenya's Revenue Authority for exchange of pre-arrival customs information, with emphasis on streamlining customs procedures.
- An MoU between the Confederation of Indian Industry and the India Kenya Chamber of Commerce and Industry was also signed on the sidelines of the JTC meeting to promote trade, investment and industry collaboration.

VI. WORLD TRADE ORGANISATION (WTO) & RECENT DEVELOPMENTS

A. WTO DISPUTES

Kazakhstan initiates dispute regarding Indonesia's duties on imported hot-rolled steel coils

- Kazakhstan requested consultations with Indonesia regarding additional *ad valorem* import duties on hot-rolled steel coils originating from Kazakhstan. The request was circulated on April 15, 2026.
- Indonesia had originally imposed anti-dumping duties on hot-rolled coils from multiple countries, including India and Russia in 2008. In the first sunset review in 2013, Indonesia extended the Russian "all others" anti-dumping duty rate on hot-rolled coils to imports from Kazakhstan and Belarus on the ground that Russia, had formed a customs union with them, without directly notifying Kazakhstan. Indonesia maintained this extension in the 2019 sunset review, citing the need to prevent circumvention in light of the Eurasian Economic Union. In 2024, following its third sunset review, Indonesia further extended the additional import duties.
- Kazakhstan alleged that Indonesia extended these duties without an affirmative determination of dumping, injury, or causation concerning imports from Kazakhstan, continued to treat Kazakhstan, Russia, and Belarus as a single market without legal basis, failed to disclose the essential facts and methodology underlying its determination, and did not properly address Kazakhstan's submissions, in breach of the General Agreement on Tariffs and Trade 1994 and the Anti-Dumping Agreement.
- This is the first time that Kazakhstan has brought a case as a complainant to the WTO dispute settlement system.

India notifies safeguard investigation on soda ash

- On April 24, 2026, Canada notified the WTO's Committee on Safeguards that it had initiated a safeguard investigation on imports of soda ash on March 16, 2026.

Zimbabwe notifies safeguard investigation on fibreboards

- On April 10, 2026, Zimbabwe notified the WTO's Committee on Safeguards that it had initiated a safeguard investigation on imports of fibreboards on July 18, 2025.

Zimbabwe notifies safeguard investigation on doors

- On April 10, 2026, Zimbabwe notified the WTO's Committee on Safeguards that it had initiated a safeguard investigation on imports of doors on July 18, 2025.

Morocco notifies safeguard investigation on certain types of rice

- On April 13, 2026, Morocco notified the WTO's Committee on Safeguards that it had initiated a safeguard investigation on imports of certain types of rice on the same day.

Philippines notifies safeguard investigation on imports of rice

- On April 13, 2026, Philippines notified the WTO'S Committee on Safeguards that it had initiated a safeguard investigation on imports of certain types of rice on March 26, 2026.

Madagascar notifies safeguard investigation on certain tableware, kitchenware, and household and packaging articles

- On April 17, 2026, Madagascar notified the WTO'S Committee on Safeguards that it had initiated a safeguard investigation on imports of certain tableware, kitchenware, and household and packaging articles, of plastic on April 15, 2026.

Madagascar notifies safeguard investigation on certain tableware, kitchenware, and household and packaging articles

- On April 17, 2026, Madagascar notified the WTO'S Committee on Safeguards that it had initiated a safeguard investigation on imports of certain unfermented fruit juices and nectars, and non-alcoholic fruit-flavoured beverages on April 15, 2026.

Canada notifies safeguard investigation on certain wood goods

- On April 23, 2026, Canada notified the WTO'S Committee on Safeguards that it had initiated a safeguard investigation on imports of certain wood goods on April 21, 2026.

B. WTO COMMITTEE

Joint Statement on the Moratorium on Custom Duties on Electronic Commerce

- On April 02, 2026, 16 Members³ of the Joint Statement on the Moratorium of Custom Duties on Electronic Transmission committed to provide to each other a temporary, plurilateral, measure of support.
- These Members agreed to maintain the current practice of not imposing custom duties on electronic transmission among themselves, and this will remain in effect till the next General Council.

Council for Trade-Related Aspects of Intellectual Property Rights

- On April 23-24, 2026, Members exchanged experiences on technology transfer and the digitalization of IP Offices and discussed Trade-Related Aspects of Intellectual Property Rights (**TRIPS**) non-violation and situation complaints.
- Under Article 64.2 of the TRIPS Agreement, Members had earlier agreed to a five-year moratorium following TRIPS' entry into force, with continued discussions on possible inclusion.

³ Argentina, Australia, Costa Rica, Ecuador, Guatemala, Iceland, Israel, Japan, Republic of Korea, Malaysia, Mexico, New Zealand, Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu; United Kingdom, United States, and Uruguay.

- At Ministerial Conference 14 (2026), the moratorium on non-violated and situation complaints agreed at Ministerial Conference 13 lapsed. At the request of Colombia, India, and Bangladesh, Members discussed the current state of play and exchanged views at the Council on TRIPS.

Committee on Safeguards

- On April 27, 2026, Members reviewed safeguard measures covering 38 products (including significant steel-related cases), examined new and ongoing safeguard legislation notifications, and raised concerns particularly over European Union, United Kingdom, and Egypt safeguard actions on steel and related products.
- Members also debated the legal characterization of certain US tariff measures, heard updates on increased use of the online safeguard notification portal, and noted that the next Committee meeting is scheduled for October 2026.

Committee on Anti-Dumping Practices

- On April 28, 2026, the Committee reviewed Members' notifications on anti-dumping laws and recent anti-dumping actions, including new legislative notifications from Botswana and ongoing reviews of legislation from several other members.
- Members examined and discussed semi-annual reports on anti-dumping investigations and measures covering July–December 2025, with 48 members reporting actions taken and others reporting none; members also raised questions on specific practices, including actions by Mexico and India.
- The Chair welcomed increased use of the anti-dumping portal but urged members to promptly submit missing semi-annual and ad hoc notifications of preliminary and final anti-dumping measures; the next meeting is scheduled for October 2026.

Committee for Trade and Development

- On April 20, 2026, at the Aid-for-Trade session of the Committee on Trade and Development, Members reviewed OECD data showing a 2% increase in Aid-for-Trade disbursements in 2024, noted concerns about projected official development assistance declines in 2025, and discussed preparations for the 10th Global Review of Aid for Trade scheduled for October 2026.
- On April 21, 2026, the Committee examined WTO technical assistance plans for 2026, discussed investment-led industrialization in Africa, considered progress on monitoring special and differential treatment, reviewed notifications on preferential and regional trade agreements, and elected new Chairs for the Committee and the Least Developing Countries (**LDC**) Sub-Committee.
- On April 22, 2022, the Sub-Committee on LDCs reviewed preparations for the 2027 midterm review of the Doha Programme of Action, discussed progress under the Enhanced Integrated Framework, and exchanged views on challenges and opportunities for LDCs, including subsidies, digital trade, intellectual property, and graduation-related issues.

Committee on Subsidies and Countervailing Measures

- On April 30, 2026, the Chair urged Members to urgently improve transparency by submitting overdue subsidy notifications as many Members have failed to notify subsidies. Further, Members discussed export subsidy phase-out compliance and reviewed updated income data used for subsidy rules.
- Members also briefly examined selected agenda items, including concerns on subsidies and overcapacity, France's electric vehicle subsidies, subsidies and the level playing field, transnational subsidies, and China's "first set" technology equipment programme. The next meeting will be held in October 2026.

ELP COMMENT:

- April 2026 saw an increased number of safeguard investigations initiated by WTO Members, especially by Zimbabwe and Madagascar.
- On April 02, 2026, 16 Members⁴ of the Joint Statement on the Moratorium of Custom Duties on Electronic Transmission committed to provide to each other a temporary, plurilateral, measure of support of not imposing custom duties on electronic transmissions.

⁴ Argentina, Australia, Costa Rica, Ecuador, Guatemala, Iceland, Israel, Japan, Republic of Korea, Malaysia, Mexico, New Zealand, Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu; United Kingdom, United States, and Uruguay.

VII. SANCTIONS IMPOSED BY INDIA

During April 2026, the Ministry of External Affairs imposed sanctions on the following entities, implementing certain United Nation (UN) Security Council regulations under the United Nations (Security Council) Act, 1947 (43 of 1947):

Date of Sanction	UN Regulation	Individuals Sanctioned	Type of Sanction	Reason for Sanction
April 13, 2026	United Nations Security Council Resolutions on Sudan (Implementation Order, 2016 as amended in 2026)	Musa Hilal Abdalla Alnsiem	Asset freeze, travel ban, and other UN-mandated sanctions (as per UNSC Sudan sanctions regime)	Individuals associated with armed groups/militias (e.g., Rapid Support Forces, NMRD) and involvement in conflict-related activities in Sudan, particularly in Darfur
		Jibril Abdulkarim Ibrahim Mayu		
		Gedo Hamdan Ahmed		
		Abdul Rahim Hamdan Dagalo		
		Al-Fateh Abdullah Idris		
		Tijani Ibrahim Moussa Mohamed		

VIII. DEVELOPMENTS IN EXPORT CONTROL IN INDIA

In April 2026, the Department of Defence Production (**DDP**), under the Ministry of Defence, issued a comprehensive compendium to streamline processes and provide consolidated guidance to the defence industry covering areas such as industrial licensing, export and import authorisations, testing infrastructure, and grievance redressal, the compendium serves as a single, unified reference point for industry stakeholders. From exports perspective, some of the SCOMET related elements are as follows:

Export authorisation pathways. The FAQs clarify that exports may be authorised under (i) transactional export authorisations (for supply contracts, re-export after repair / MRO, or exports for testing and evaluation); (ii) Open General Export Licences (**OGELs**), which operate as “standing” bulk licences for specified items and pre-approved destinations without quantity caps; (iii) repeat authorisations, which allow follow-on shipments of the same item to the same end-user without full stakeholder consultation; and (iv) specific permissions for temporary exports for participation in exhibitions, tenders, demonstrations and trials.

Application workflow and documentation. Exporters are required to apply online through the Defence EXIM portal, selecting the relevant SCOMET sub-category and uploading (as applicable) a copy of the purchase / supply contract, detailed technical specifications, End-User Certificates (**EUCs**) from all entities in the chain, manufacturing or trader licences under the Arms Act or Industrial Licensing framework, and internal technology / compliance plans for transfers of software and technology. The Compendium also includes a dedicated FAQ on common deficiencies in applications (for example, incomplete EUCs, misaligned quantities and values, or incorrect sub-category selection), giving companies a de facto checklist for internal review.

Timelines and validity. The Compendium records that, in standard cases requiring stakeholder consultation, DDP aims to decide export authorisation applications within four weeks, and within two weeks where consultation is not required (such as certain non-lethal items for exhibitions / tenders). It also summarises the typical validity periods for different authorisation types (for example, up to contract completion for general exports, 24 months for technology / software / service transfers or participation in tenders, 6 - 12 months for demos and exhibitions, and two years for OGELs).

ELP COMMENT:

- The DDP Compendium represents an important step in making India’s defence production and export control ecosystem more accessible and transparent for industry, particularly with respect to SCOMET Category 6 and related defence export / import authorisations. By consolidating SOPs, FAQs, portal workflows and contact points in a single reference document, DDP has sought to provide industry with clearer sightlines on responsibilities, documentation and timelines, while signalling a continued shift towards a codified, licence and portal driven model for defence trade controls.
- Importantly, the Compendium also serves as a practical reference point for addressing common issues encountered in application processes, offering exporters clearer guidance on recurring deficiencies,

documentation expectations, and procedural nuances. This is particularly relevant for exporters dealing with defence and dual-use items, where compliance requirements are often complex and highly scrutinised.

- For companies in defence and dual-use sectors, early alignment with these developments, through updated internal compliance frameworks, proactive engagement with digital portals, and closer coordination between trade, legal and technical teams, will be critical to managing regulatory risk while leveraging emerging opportunities in India's evolving export control landscape.

IX. NATIONAL SECURITY, SANCTIONS & EXPORT CONTROLS AROUND THE GLOBE

A. UNITED STATES OF AMERICA (USA)

- On April 01, 2026, the US Department of the Treasury's Office of Foreign Assets Control (**OFAC**) removed Delcy Eloina Rodríguez Gómez (also known as Delcy Rodríguez) from the Specially Designated Nationals and Blocked Persons (**SDN**) List under the Venezuela sanctions program. The removal applies to all listed aliases and identifiers associated with the individual.
- On April 03, 2026, US OFAC removed Mikhail Mikhaylovich Zadornov (also known as Mikhail Mikhailovich Zadornov) from the SDN list under Executive Order 14024 (Russia-related sanctions). The removal applies to all listed aliases and identifiers associated with the individual, who had been linked to Public Joint Stock Company Bank Financial Corporation Otkritie.
- On April 13, 2026, the US Department of Commerce's Bureau of Industry and Security (**BIS**) issued a Proposed Charging Letter against Coastal PVA Technology, Inc., alleging 18 violations of the Export Administration Regulations (**EAR**). BIS alleges that, between May 2021 and May 2024, the company exported EAR99 polyvinyl alcohol (**PVA**) brushes used in semiconductor manufacturing to Semiconductor Manufacturing International (Beijing) Corporation and Semiconductor Manufacturing North China (Beijing) Corporation, both on the BIS Entity List, without the required license.
- On April 14, 2026, US OFAC issued Venezuela General License 56, authorizing commercial-related negotiations of contingent contracts with the Government of Venezuela, and Venezuela General License 57, authorizing certain financial services transactions involving specified Venezuelan banks and Government of Venezuela individuals.
- On April 14, 2026, US OFAC issued Counter Terrorism General License 35 authorizing the wind-down of transactions involving entities blocked on April 14, 2026. On the same date, US OFAC issued Russia-related General License 128C covering certain transactions involving Lukoil retail service stations located outside Russia and Russia-related General License 130A covering transactions involving certain Lukoil entities in Bulgaria.
- On April 15, 2026, US OFAC added individuals, entities, and vessels to the SDN list pursuant to Executive Order 13902 and Executive Order 13224, as amended, as part of its action titled Economic Fury Targets Illicit Oil Smuggling Network Run by Iranian Regime Elite. The action targets an illicit oil transportation and sanctions evasion network operated by Mohammad Hossein Shamkhani. **Two Indian persons namely, Chetan Prakash Balhotra and Tanjore Sunilkumar Srinivas and two Indian entities namely, Fleet Tanqo Private Limited and House of Shipping Private Limited were designated in connection with the Shamkhani network.** US OFAC also designated other individuals and companies and identified vessels involved in the transportation of Iranian oil and liquefied petroleum gas and in a related oil for gold scheme linked to Hizballah.
- On April 16, 2026, US OFAC sanctioned seven individuals and seven mining sector entities by adding them to the SDN list under the Nicaragua sanctions program. The entities sanctioned include Exportadora de Metales Sociedad Anonima, Brother Metal S.A., Grupo Minero Xiloa S.A., Nicaragua Xinxin Linze Minería Group S.A., Santa Rita Mining Company S.A., Thomas Metal S.A., and Zhong Fu Development S.A.
- On April 16, 2026, US OFAC issued Nicaragua-related General License No. 5 under 31 CFR part 582, authorizing until 12:01 a.m. EDT on May 16, 2026, transactions ordinarily incident and necessary to wind down transactions involving

Exportadora de Metales Sociedad Anonima, and any entity in which it owns, directly or indirectly, a 50 percent or greater interest, subject to blocked payment requirements.

- On April 17, 2026, US OFAC sanctioned ten individuals and two entities by adding them to the SDN list under counterterrorism and Sudan related authorities. The counterterrorism sanctions target Iran backed Iraqi militia commanders linked to Kata'ib Hizballah, Kata'ib Sayyid al-Shuhada, Harakat al-Nujaba, and Asa'ib Ahl al-Haq. The entities sanctioned are Fenix Human Resources S.A.S. and Global Qowa Al Basheria S.A.S.
- On April 17, 2026, US OFAC issued General License No. 134B, authorizing transactions ordinarily incident and necessary to the sale, delivery, or offloading of crude oil and petroleum products of Russian Federation origin loaded on blocked vessels. The authorization covers related maritime services such as docking, crew safety, emergency repairs, environmental mitigation, vessel management, crewing, bunkering, insurance, classification, and salvage, and replaces General License No. 134A. The authorization applies until 12:01 a.m. EDT on May 16, 2026.
- On April 21, 2026, US OFAC sanctioned eight individuals, four entities, and two aircrafts based in Iran, Türkiye, and the United Arab Emirates (**UAE**), adding them to the SDN list as part of its action titled Economic Fury Targets Iranian Missile and UAV Procurement Networks. These individuals and companies were involved in Iranian missile and unmanned aerial vehicle procurement.
- On April 23, 2026, US OFAC sanctioned individuals and entities by adding them to the SDN list under Executive Order 14059 in connection with a global synthetic opioid supply chain linked to the Sinaloa Cartel. The action targets chemical suppliers, brokers, importers, and logistics networks involved in the procurement and movement of fentanyl and methamphetamine precursor chemicals across Asia, Latin America, and North America. As part of the same action, **US OFAC sanctioned Indian nationals namely, Satishkumar Hareshbhai Sutaria and Yuktakumari Ashishkumar Modi, and India-based entities namely, SR Chemicals and Pharmaceuticals and Agrat Chemicals and Pharmaceuticals**, for facilitating the sale and shipment of fentanyl precursor chemicals to Latin America, including through mislabelled exports.
- On April 23, 2026, US OFAC sanctioned Cambodian senator Kok An, associated individuals, and a broad network of companies by adding them to the SDN list under cyber-related authorities. The action targets cyber scam centers and related casinos, banks, real estate, hospitality, and front companies used to conduct digital asset investment fraud, launder proceeds, and facilitate human trafficking targeting U.S. victims.
- On April 24, 2026, US OFAC sanctioned multiple shipping and trading entities by adding them to the SDN list under Executive Order 13902 in connection with Iran's global oil trade and shadow fleet operations. The action targets companies involved in the ownership, management, and operation of tankers used to transport Iranian crude oil and petroleum products, including shipping companies incorporated in China, Hong Kong, the Marshall Islands, Panama, Liberia, Vietnam, and the Cayman Islands.
- On April 24, 2026, US OFAC updated the SDN list entry for Bank Markazi Jomhuri Islami Iran (Central Bank of Iran) to include additional digital currency identifiers, while maintaining its designation under counterterrorism and Iran-related authorities for links to the IRGC-Qods Force and Hizballah.
- On April 28, 2026, US OFAC issued an alert to financial institutions warning of sanctions risks associated with China based independent "teapot" oil refineries, particularly in Shandong Province, due to their role in importing and refining Iranian origin crude oil. The alert advises financial institutions to apply risk-based controls, conduct enhanced due diligence on transactions involving China based refineries, communicate sanctions compliance expectations to correspondent banks, and highlights common evasion practices including the use of front companies, intermediary brokers, and deceptive shipping methods involving a shadow fleet. US OFAC further

cautioned that it is prepared to apply secondary sanctions against foreign financial institutions that continue to support Iran's petroleum sector.

B. EUROPEAN UNION (EU)

- On April 20, 2026, the European Commission proposed the full resumption of the EU-Syria Cooperation Agreement, signaling a further step in the normalization of EU-Syria relations. The proposal follows the EU's new cooperation framework with Syria announced in January 2026 and builds on the lifting of all EU economic sanctions on Syria in May 2025. The Cooperation Agreement, partially suspended since 2011, provides for enhanced political dialogue and economic cooperation, including the abolition of customs duties on most Syrian industrial products entering the EU and the removal of quantitative trade restrictions.
- On April 23, 2026, the EU adopted its 20th package of sanctions against Russia, expanding restrictive measures across the energy, financial services, trade, transport, and media sectors, with a strong emphasis on anti-circumvention. The package includes additional listings targeting Russia's energy sector and shadow fleet. The scope of trade measures has been expanded for financial and crypto related transactions. The package also introduced new import and export bans aimed at the military industrial complex, the first activation of the EU anti-circumvention instrument to address systematic re-export of sanctioned EU goods via third countries, and further measures strengthening legal protections for EU operators.
- On April 23, 2026, the Council of the European Union adopted Council Implementing Regulation (EU) 2026/509, implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. The Regulation adds 37 individuals and 80 entities to the EU sanctions list, including Russian government officials, military and defence-sector figures, energy companies, shipping and logistics operators, financial and investment entities, technology suppliers, and third-country intermediaries, for their involvement in Russia's war of aggression against Ukraine, sanctions circumvention, or support to Russia's military-industrial complex.
- On April 23, 2026, the Council of the European Union adopted Council Implementing Regulation (EU) 2026/505, implementing Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and its involvement in the Russian aggression against Ukraine. The Regulation added three entities to the EU sanctions list, including Belarusian defence- and energy-sector entities and a Chinese company, for supporting the Belarusian military-industrial complex and the Lukashenka regime, including through the development, production, and supply of military equipment.

C. UNITED KINGDOM (UK)

- On April 22, 2026, the UK government published guidance on Sanctions End-Use Controls (**SEUC**) under the Sanctions and Anti-Money Laundering Act 2018, clarifying that a license is required only where an exporter has been formally informed by the government that a specific export to a non-sanctioned third country presents a risk of diversion to a sanctioned destination or person. The guidance confirms that SEUC does not impose blanket licensing requirements.
- On April 23, 2026, the UK government published guidance explaining how the Office of Trade Sanctions Implementation (**OTSI**) assesses applications for trade sanctions licenses. The guidance sets out a case specific and activity-based assessment, under which OTSI considers whether UK sanctions apply to the prospective licensee and

recipient, whether the proposed activity is prohibited under the relevant sanctions regulations, and whether the purpose of the activity is consistent with the objectives of the sanctions regime. The guidance also confirms that OTSI may issue a “*No License Required*” notification where an activity is not prohibited under UK trade sanctions.

- On April 28, 2026, the UK implemented a United Nations designation under The Sudan (Sanctions) (EU Exit) Regulations 2020 against Al Goney Hamdan Dagalo, imposing an asset freeze and travel ban. The designation was made pursuant to UN Security Council resolution 1591 (2005) for actions threatening the peace, security, and stability of Darfur, including through his role in procuring weapons and military material for the Rapid Support Forces.

D. PEOPLE'S REPUBLIC OF CHINA

- On April 15, 2026, China issued rules on countermeasures against foreign states’ unlawful extraterritorial jurisdiction. The regulations define unlawful extraterritorial jurisdiction as foreign measures that violate international law and harm China’s sovereignty, security, development interests, or the lawful rights of Chinese citizens and organizations. The rules authorize the Chinese government to adopt countermeasures, establish a malicious entity list targeting foreign organizations and individuals involved in implementing such measures, prohibit any organization or individual from enforcing or assisting in the enforcement of unlawful extraterritorial measures, and permit affected Chinese parties to initiate civil litigation, with government guidance and support, against those enforcing such measures.
- On April 24, 2026, the Ministry of Commerce of the People’s Republic of China (**MOFCOM**) announced the addition of seven EU entities, including FN Herstal, to China’s Restricted list pursuant to the Export Control Law of the People’s Republic of China and the Regulations on Export Control of Dual-Use Items. MOFCOM stated that export operators are prohibited from exporting dual-use items to the listed entities, that overseas organizations and individuals are likewise prohibited from transferring or providing China-origin dual-use items to them, and that any ongoing related activities must cease immediately. MOFCOM indicated that the listings target a limited number of EU military-related entities linked to arms sales to China’s Taiwan region, were notified to the EU in advance through bilateral export control dialogue, and are limited to dual-use items, without affecting normal China-EU economic and trade relations.
- On April 25, 2026, a spokesperson for the MOFCOM stated that China is strongly dissatisfied with and firmly opposes the European Union’s decision to include Chinese companies in the 20th round of EU sanctions against Russia. MOFCOM reiterated China’s opposition to unilateral sanctions imposed without authorization from the UN Security Council and criticized what it described as the EU’s “long arm jurisdiction” over Chinese companies and individuals. China urged the EU to remove Chinese entities from the sanctions list and indicated that it would take necessary measures to safeguard the legitimate rights and interests of Chinese companies, warning that the EU would bear the consequences of its actions.

ELP COMMENT:

The sanctions and export control developments in April 2026 reflect a continued shift toward coordinated and network-based enforcement across the US, EU, and UK. Enforcement authorities increasingly appear focused not only on primary sanctioned actors, but also on intermediaries, facilitators, logistics providers, trading entities, and cross-border supply chains that enable sanctions evasion, illicit procurement, or restricted trade activity. At the same time, selective delistings and the issuance of general licences indicate a calibrated approach aimed at balancing enforcement objectives with commercial, operational, and humanitarian considerations. Recent actions also demonstrate that compliance risk is increasingly determined by counterparty, end use, and transaction structure, rather than geography or corporate form. Businesses should therefore maintain jurisdiction-specific, transaction-level controls, including enhanced due diligence for third-country routing arrangements, intermediary participation, and indirect exposure to sanctioned persons or restricted sectors.

We hope you have found this information useful. For any queries/clarifications please write to us at insights@elp-in.com

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