



Speaking Points for the OECD Working Party of the Trade Committee

June 2026

Item 3. Update on Trade Communications

[Speaker] n/a

- This item is for information only. The following points may be conveyed in writing.
- Thank you Chair
- BIAC welcomes the Secretariat's proactive engagement on communications and the constructive collaboration around the launch of the OECD MAGIC database, which serves as a strong example of effective outreach to business audiences.
- We appreciate the early engagement and sharing of materials, including the media advisory and communications toolkit, which enabled BIAC to support amplification across its network of business and communications experts.
- BIAC stands ready to systematically support the dissemination of OECD trade outputs going forward. Indeed, we see clear value in earlier and structured cooperation with BIAC ahead of major releases.
- From a broader perspective, BIAC encourages approaches that strengthen openness and accessibility of OECD communications, ensuring that key policy insights reach not only the general public but also decision-makers and economic actors directly involved in implementation.
- Thank you

Item 5. Towards a better understanding of recent international agreements concerning critical raw materials - draft report

TAD/TC/WP(2026)6

- Thank you Chair,
- We welcome this very useful OECD mapping exercise. It clearly highlights both the rapid proliferation and the strong heterogeneity of recent CRM agreements, as well as their growing role as flexible policy tools.
- From a business perspective, a first key point is that trade-related provisions remain comparatively limited across these agreements, while investment and cooperation dominate. We recognise that many of these instruments are not designed as traditional trade agreements; however, open and predictable trade remains the foundation of resilient supply chains. We would therefore encourage ensuring stronger coherence with existing trade disciplines, including on export restrictions and market access.
- Second, the strong focus on investment facilitation is welcome. At the same time, the

mapping shows that relatively few agreements include concrete or operational commitments. To deliver real impact, frameworks should increasingly support bankable conditions for projects, including legal certainty, predictable regulatory environments, and tools such as long-term offtake arrangements and risk-sharing mechanisms.

- Third, we note that ESG provisions are widely included but often remain broad and insufficiently operational. From a business perspective, there is a need to move towards more interoperable, streamlined and standards-based approaches that reward responsible production while avoiding unnecessary complexity.
- Fourth, the report highlights the importance of technology transfer, research and skills development as key pillars of these agreements. Ensuring that these elements are translated into concrete cooperation mechanisms and project pipelines will be critical to support diversification and innovation across the value chain.
- Finally, many agreements still lack robust implementation and monitoring mechanisms. Given that a large share are non-binding and cooperation-oriented, the priority now should be on operationalisation—through clear roadmaps, governance structures, and follow-up processes that ensure delivery in practice.

Item 6. OECD Report on “Critical Raw Materials: International Trade and Economic Security” (2026) - annotated outline

[TAD/TC/WP\(2026\)7](#)

- Thank you Chair,
- We strongly support the direction of this report and its focus on trade, concentration, and economic security in CRM markets.
- The analysis in Chapters 2 and 3 clearly sets out the scale of the challenge—rising demand, high and persistent supply concentration, and the increasing use of export restrictions and other distortions.
- At the same time, for a flagship OECD report, the next step will be to shift more clearly from diagnosing these risks to identifying actionable solutions.
- In that respect, Chapter 5 is particularly important, but could be further strengthened. While it highlights investment and policy responses, we would encourage a more central and practical focus on the conditions required to actually deliver projects—across mining, processing, and recycling. [
- We would also suggest that the report adopt a more explicit end-to-end value chain perspective. While upstream supply and trade measures are covered in depth—particularly in Chapters 2 and 3—downstream dimensions such as recycling, material recovery, and secondary raw materials remain underdeveloped, despite being essential to resilience and diversification.
- In addition, Chapters 4 and 5 could benefit from a stronger integration of the private sector perspective. Given that investment, innovation and supply-chain adjustments are ultimately driven by firms, this would help ground the analysis more firmly in operational realities.
- Finally, while the report rightly focuses on risks—particularly export restrictions and non-market practices in Chapter 3—it is equally important to clearly underline that open and well-functioning markets are not only part of the challenge, but a core part of the solution.

OECD Workshop on “Policy Options to Address Pressures in International CRM Markets” - concept note:

TAD/TC/WP/RD(2026)1

- Thank you, Chair.
- We very much welcome this initiative and would be pleased to contribute to the workshop.
- The proposed structure provides a strong basis for a useful and forward-looking discussion. In this context, we would particularly encourage a strong integration of the private sector perspective.
- Bringing in concrete examples of what companies are doing on the ground—across investment, supply diversification, and recycling—would significantly enrich the discussions and provide a valuable complement to the OECD’s analytical work.
- Business at OECD stands ready to support the OECD in this regard.

Item 9. Resilience strategies and policy options: smart stockpiling

TAD/TC/WP(2026)10

10. Resilience strategies and policy options: supply chain diversification

TAD/TC/WP(2026)11

- Thank you, Chair.
- We support both the paper and the OECD Secretariat’s continued work on shortages and stockpiling.
- We find the paper particularly helpful in articulating a risk-based and context-specific approach to stockpiling, rather than treating stockpiling as a default policy response. The emphasis on looking upstream in the supply chain at APIs and not solely at finished products is particularly welcome. We also strongly welcome the paper’s discussion of the costs and distortions created by uncoordinated national stockpiling requirements, including the risk of locking scarce products into national reserves and undermining efficient reallocation across markets. The stress the paper placed on international coordination and public-private engagement is especially valuable and, in our view, essential, if stockpiling policies are to avoid unintended consequences of creating shortages in third markets.

We also see real value in the paper as a potential reference point for policymakers, helping to distinguish between clinically essential medicines at highest risk of shortage and products, including over the counter products, for which stockpiling is unlikely to be effective or proportionate.

- More broadly, it will be important to consider these different strategies together as complementary elements of a toolbox for supply chain resilience – and to ensure that industry retains meaningful authority over most of them, given that companies are ultimately the ones managing supply chains on the ground. As the paper rightly recognises, tools like stockpiling can have negative effects if not implemented correctly, which is precisely why a smart, risk-based approach makes sense. That said, the devil is often in the detail, and we are still reviewing some of those specifics – so while we endorse the direction, we may have further technical observations to share as the work develops.
- Looking ahead, there are a few areas where further reflection could be helpful as the work is refined. In particular, exploring what good practice would look like as governments

operationalise risk-based decision-making. This includes identifying if possible criteria, governance, and triggers for establishing or releasing stockpiles would strengthen the framework. We also see scope to further develop the treatment of over-the-counter versus prescription medicines, given the different demand dynamics and patient risks involved. Finally, continued attention to how stockpiling interacts with long-term supply resilience would be welcome.

- Overall, we see the direction of travel set out in the paper as a constructive one and encourage the Secretariat to continue developing this line of analysis.

Item 12. Digital tools for trade facilitation:

TAD/TC/WP(2026)4/REV1

TAD/TC/WP(2026)12

- Thank you, Chair.
- BIAC strongly welcomes this work on digital tools for trade facilitation. It reflects a shift already well underway in practice: from document-based procedures to data-driven, interconnected supply chains. Digitalisation has become a core driver of efficient, predictable and resilient trade – and it deserves serious analytical attention at the OECD level.
- One framing point worth stating clearly: digitalisation is an enabler of trade facilitation, not an objective in itself. The underlying goals remain what they have always been – simpler procedures, less duplication, faster and more predictable clearance. Digital tools only deliver on those goals when the underlying processes have been genuinely streamlined. Without that, the risk is simply digitising existing inefficiencies.
- On interoperability and data governance: the fragmentation identified in these papers is not abstract. Businesses operating across multiple jurisdictions encounter it directly – in incompatible data standards, gaps in mutual recognition, and unpredictable cross-border data flows. We particularly welcome the inclusion of data governance, cybersecurity and data-sharing frameworks within the dTFIs. These are foundational to trust, and trust is foundational to adoption.
- We also welcome the focus on operational reality rather than the mere existence of legal frameworks. What matters to business is whether systems are actually usable across agencies, whether data can be submitted once and reused, and whether processes are digital end-to-end – not just at a single touchpoint. The distinction between pilot projects and fully operational systems is critical in that respect.
- On the dTFIs themselves: they are a genuinely valuable contribution, both to track progress and to surface gaps between legal frameworks and what actually works in practice. The methodology strikes the right balance, and going forward the priority should be consistency, practical relevance, and enough flexibility to keep pace with rapid technological change.
- A broader point on public-private cooperation: firms are not only users of supply chain data – they are increasingly its producers, generating traceability, compliance and logistics data as a matter of course. Effective frameworks have to be built with industry, not just for it.

- BIAC stands ready to engage actively with this work – providing cross-sectoral input, identifying practical bottlenecks, and contributing concrete case studies that illustrate what works, where implementation challenges arise, and how digital tools translate into measurable trade facilitation outcomes.

Item 13. Trade facilitation implications of carbon-intensity requirements:

TAD/TC/WP(2026)5/REV1

- Thank you, Chair.
- BIAC welcomes this paper, and particularly its focus on implementation and trade facilitation – areas that have received less attention than the methodological debate.
- Four brief points.
- First, technical interoperability matters as much as methodological alignment. Companies investing in emissions accounting still face divergent system boundaries, allocation rules, and recognition of market-based instruments across jurisdictions. Without greater mutual recognition, the same product can trigger multiple, overlapping reporting and verification requirements.
- Second, implementation should build on what already exists. Single Windows and digital customs systems are a good starting point, but there are also lessons from established customs practices – rules of origin, valuation, conformity assessment – where authorities routinely rely on certification and trusted third parties rather than direct verification. Parallel systems should be a last resort.
- Third, coverage choices determine whether level playing field objectives are actually achieved. Where key intermediates, feedstocks or substitute products fall outside a regime's scope, the risk of leakage and competitive distortion grows. Product coverage deserves careful attention.
- Fourth, flexibility mechanisms help. Default carbon-intensity values for imports, with the option to submit verified product-specific data, can ease implementation – particularly for SMEs and firms in jurisdictions with limited reporting infrastructure.
- Looking ahead, mutual recognition arrangements among trading partners would do more than anything else to reduce compliance costs and improve predictability.
- The core challenge has shifted: it is no longer just about what information is required, but whether systems can efficiently exchange, verify and recognise that information across borders. Practical implementation and international cooperation will determine whether these measures succeed.

Thank you, Chair.

- BIAC welcomes this paper and its focus on implementation and trade facilitation.
- Three brief points.
- First, interoperability and mutual recognition are as important as methodological alignment. Differences in data preparation, verification, and recognition continue to create unnecessary compliance burdens.
- Second, implementation should build on existing trade and customs tools. Single Windows, certification systems, and trusted third-party approaches can help avoid duplicative processes.
- Third, achieving a level playing field requires careful consideration of product coverage, including intermediates, feedstocks, and substitute goods. Flexibility mechanisms, such as default carbon-intensity values with the option to submit verified data, can also facilitate implementation.
- Looking ahead, international cooperation and mutual recognition arrangements will be critical. The key challenge is no longer only what information is required, but how it can be efficiently exchanged, verified, and recognised across borders.
- We will provide further comments in writing.