

# WTO Saga: Agriculture Export Restrictions in Times of Crisis

Sachin Kumar Sharma, Paavni Mathur, Talha Akbar Kamal, and Teesta Lahiri



## 1. Introduction

Agricultural export restrictions or prohibitions (ER) have emerged as one of the most contentious issues in global trade governance, particularly amid recurring food crises, geopolitical instability, supply chain disruptions, climate-induced production shocks, and rising inflationary pressures. Such measures are widely criticized because they can undermine food security in importing countries, drive up international prices, disrupt global supply chains, and lead to missed opportunities for domestic traders and farmers.

However, several countries still resort to imposing export prohibitions, quotas, licensing requirements, minimum export prices, and other export control measures to ensure domestic food availability,

stabilise prices, and protect vulnerable consumers during periods of market stress. Also, export restrictions measures have been applied across countries, regardless of whether they are developed, developing, least developed, or net food-importing.<sup>1</sup>

India has imposed a temporary export prohibition on sugar (Box 1), announced on 13th May 2026. This is not the only ER that India has imposed; it has also imposed such measures on rice, wheat, and onion. India maintains that these measures are necessary to ensure domestic food security and to stabilise market prices for a population of 1.4 billion (Box 2).

In recent years, some World Trade Organization (WTO) Members, including Russia, Argentina, Thailand, Bangladesh, Malaysia, Morocco, and Ukraine, have also imposed

RIS Policy Briefs are prepared on specific policy issues for policymakers.



Sachin Kumar Sharma



Paavni Mathur



Talha Akbar Kamal



Teesta Lahiri

This Policy Brief has been prepared by Professor Sachin Kumar Sharma, Director General, RIS, Ms. Paavni Mathur, Consultant, RIS, Dr. Talha Akbar Kamal, Consultant (Economics), Centre for WTO Studies, IIFT, and Ms. Teesta Lahiri, formerly at Centre for WTO Studies, IIFT and PhD Student, Scuola Superiore Sant' Anna, Pisa, Italy. Views expressed are personal. Usual disclaimers apply.



## Box 1- Policy Update on India's Sugar Export

On 13th May 2026, India invoked export prohibition on sugar (raw sugar white sugar and refined sugar), till 30th September 2026.

Key exemption:

1. Loading of sugar has commenced before the date of notification, or ship bill has been filed, or sugar consignment has been handed over to Customs
2. Sugar exports may still be permitted to countries facing food security needs upon request by their government.

*Source:* Government of India. (2026). Amendment in Export Policy of Sugar- regarding. Notification No.16/2026-27.

export restrictions or prohibitions on agricultural commodities under exceptional circumstances.

Against this backdrop, agricultural export restrictions have become a major issue of discussion in the WTO. The issue has increasingly become linked with broader debates concerning global food security, policy space for developing countries,

transparency obligations, and the balance between domestic and international food security concerns.

This policy brief provides information on reasons why WTO Members impose export restrictions, the WTO rules governing such measures, and recent discussions at the WTO.

## Box 2 - India's Foreign Trade Policy

### Free Trade

Under India's Foreign Trade Policy (FTP) 2023, all exports are treated as "Free" unless specifically classified as prohibited, restricted, or regulated under the Indian Trade Classification (HS) Schedule II.

### Strict Justifications

Under Para 2.07 "*Principle of Restrictions*", the measure cannot be imposed arbitrarily. Restrictions can be imposed based on certain conditions, such as:

1. Preventing Critical Shortages
2. Protecting National Security
3. Maintain Public Order

### Restrictions are Exceptions

Export Restrictions may be imposed under limited and justified circumstances.

*Source:* Directorate General of Foreign Trade (DGFT) Foreign Trade Policy, 2023.

<sup>1</sup> Sharma, S.K., Goswami, A., and Lahiri, T. (2024). Export Restrictions: Balancing Global and Domestic Food Security. New18.

## 2. Understanding the Impact of Agricultural Export Restrictions

Many WTO members, particularly from Net Food Importing Developing Countries (NFIDCs) and the G-10, argue that export restrictions imposed by major exporters reduce global supply, raise international prices, create uncertainty, and adversely affect food security in importing countries.

### G-10 Members in the WTO Agriculture Negotiation Group

- (1) Iceland, (2) Israel, (3) Japan,
- (4) Korea, Republic of,
- (5) Liechtenstein, (6) Mauritius,
- (7) Norway, (8) Switzerland, and
- (9) Chinese Taipei.

*Source:* Authors' compilation based on the WTO Agriculture Negotiation Grouping.

Geopolitical tensions and pandemics such as COVID-19 have caused the global food market to experience shortages and sudden spikes in international prices. To safeguard vulnerable populations and ensure food is available at affordable prices, countries adopt various trade measures. Food-exporting countries impose export restrictions, while food-importing countries reduce import tariffs; both use different measures to boost domestic food supply.<sup>2</sup>

In the case of food-exporting countries, several specific situations often prompt governments to impose export restrictions:

Firstly, unhindered exports of foodstuffs during such periods could not only lead to domestic shortages and high inflation but could also impact the food security of the domestic

population. Additionally, importing countries reduce their tariffs steeply to encourage more imports.

Secondly, a net-food-exporting country may become a net-food-importer in a short time. Thus, export restrictions are a useful tool to avoid situations in which a country that was exporting large quantities now must import the same product at much higher prices to meet its basic food security needs in the domestic market.<sup>3</sup> Further, when major developing-country exporters enter international markets as large importers during periods of global shortages, this can further intensify global demand, tighten already constrained supplies, and raise prices, thereby adversely affecting the food security of smaller and import-dependent countries.

Thirdly, the importing country may try to import more than is required for its domestic food security and then re-export the surplus for commercial interests. Additionally, blanket exemptions for specific categories of importing Members could result in products continuing to enter international markets indirectly through intermediary trade channels, thereby weakening the measures effectiveness and complicating the exporting Member's domestic supply management efforts during periods of crisis.

Fourthly, some vested interest groups may exploit the crisis for financial gains at the expense of hungry people in the most vulnerable countries. For example, in 2023, the United Nations report states that 90 per cent of corn and 60 per cent of wheat have been exported to high- and upper-middle-income nations rather than to countries with high

<sup>2</sup> Sharma, S.K., Goswami, A., and Lahiri, T. (2024). Export Restrictions: Balancing Global and Domestic Food Security. New18.

<sup>3</sup> Ibid

<sup>4</sup> Ibid

levels of hunger under the Black Sea Grain Initiative, which aimed to combat hunger amid Russia-Ukraine geopolitical tensions.<sup>4</sup>

Consequently, export restrictions involve a complex policy trade-off between safeguarding domestic food security and maintaining stable, predictable global food markets.

### 3. WTO Rules Governing Export Restrictions

The WTO framework establishes a balance between the principle of free trade and the policy flexibility required by Members during exceptional domestic circumstances.

According to Table 1, Article XI of the GATT 1994 is the principal WTO rule on export restrictions. It generally prohibits quantitative restrictions on imports and exports, allowing only duties, taxes, or other charges.

Article XI:2(a) creates a key exception. It permits export prohibitions or restrictions that are temporarily applied to prevent or relieve critical shortages of foodstuffs or other products essential to the exporting Member. Export restrictions are therefore treated as exceptional measures, permitted only under specific conditions, rather than as ordinary trade policy tools.

Article 12 of the Agreement on Agriculture (AoA) sets out procedural and transparency obligations for export restrictions on foodstuffs taken under Article XI:2 (a). Members must consider the food security concerns of importing Members, notify the WTO Committee on Agriculture as far in advance as practicable, and consult importing Members upon request. Under Article 12 of the AoA, developing country Members are exempt from these notification and consultation obligations unless they are net exporters of the specific foodstuff, reflecting recognition of their developmental and food security concerns.

There have also been country-specific practices that provide exemptions from export restrictions on humanitarian or strategic grounds, often justified as a way of ‘giving due consideration’ to the food security of importing Members.

### 4. Recent discussion on Export Restrictions at the WTO

The issue of agricultural export restrictions gained considerable prominence during the COVID-19 pandemic, when numerous countries imposed export controls on food and medical products to address

**Table 1: How Rules Govern Export Restrictions and Prohibitions**

Provisions	Key Disciplines
<b>GATT Article XI: 1</b>	General prohibition on quantitative restrictions
<b>GATT Article XI: 2</b>	Temporary ER allowed during critical shortages
<b>AoA Article 12</b>	Notification obligations for foodstuffs

*Source:* Authors’ compilation based on selective provisions of GATT 1994 and the Agreement on Agriculture.

domestic shortages and food security concerns.<sup>5</sup> These developments intensified discussions within the WTO agriculture negotiations regarding the balance between domestic policy flexibility and the stability of global food markets.

One of the major proposals during this period concerned exemptions for food purchases by the World Food Programme (WFP). Singapore and several WTO Members proposed that food procured by the WFP for humanitarian purposes should be exempt from export restrictions. This proposal ultimately led to the Ministerial Decision adopted at the 12th Ministerial Conference (MC12), under which the WFP's food purchases for non-commercial humanitarian purposes were exempted from export prohibitions and restrictions (Box 3).<sup>6</sup>

Post-MC 12, Members, including Japan and the United Kingdom, argued that export restrictions imposed by major exporters reduce global supply, increase market volatility, and adversely affect vulnerable importing countries, particularly Least Developed Countries (LDCs) and Net Food-Importing Developing Countries (NFIDCs). These Members proposed enhanced

### Box 3: Impact of Exception for WFP

**Since MC 12 Decision:** World Food Programme has procured a total of 1.8 Million MT of food, valued at USD 1.4 billion. Additionally, WFP already provided support to over 111 million vulnerable people.

*Source:* Authors; compilation based on WTO Document (G/AG/GEN/208).

reporting obligations, greater scrutiny of measures imposed under Article XI:2 (a) of the GATT, and mandatory 30-day advance notification. But many countries believe that 30-day advance notification of imposing export restrictions can adversely affect market conditions by exacerbating shortages and promoting hoarding and black-market activity (Box 4).

At the same time, NFIDCs and LDCs emphasised their dependence on food imports, highlighted the adverse effects of export restrictions on their food security, and demanded exemptions from such restrictions or safeguards to ensure uninterrupted access to essential food supplies during crises.

<sup>5</sup> WTO. (2020). Export Prohibitions and Restrictions: Information Note. <[https://www.wto.org/english/tratop\\_e/covid19\\_e/export\\_prohibitions\\_report\\_e.pdf](https://www.wto.org/english/tratop_e/covid19_e/export_prohibitions_report_e.pdf)>

<sup>6</sup> WTO. (2022). Ministerial Decision on World Food Programme Food Purchases Exemption from Export Prohibitions or Restrictions, Adopted on 17 June 2022. Document No. WT/MIN (22)/29.

### Box 4: Advanced notification



- For instance, Russia and Argentina, have themselves failed to provide advance notification of export restrictions, highlighting the practical limitations.
  - In practice, most countries who have imposed Export Restrictions do not notify the measure in advance.
  - As advance notification may trigger market speculation and hoarding, accelerating exports before the measure enters into force and ultimately undermining the restriction's effectiveness.

However, many developing countries, including India, maintained that export restrictions remain legitimate policy instruments necessary to protect domestic food security and stabilise prices. India emphasised that food security should also encompass domestic availability, accessibility, and affordability of food, especially for vulnerable populations.

The discussions at the WTO continue to reflect differing perspectives between exporting and importing Members. While several Members seek stronger transparency obligations and tighter disciplines to ensure predictable and stable global food markets, developing countries continue to stress the importance of retaining adequate policy space to respond to domestic shortages, inflationary pressures, and food security challenges. As a result, there has been no outcome on export restrictions at either the 13th or the 14th Ministerial Conference (Box 5).

## 5. Conclusion

In essence, export restrictions should be viewed as measures of last resort used during periods of crisis and

exceptional domestic circumstances. WTO rules recognise that Members may require temporary flexibility to address critical domestic shortages, food security concerns, and market instability. Consequently, export restrictions are permitted only under specific conditions as exceptions to the general prohibition on quantitative restrictions.

At the same time, such measures can adversely affect global food security by reducing supplies in international markets and increasing uncertainty for import-dependent countries. The food security concerns of exporting countries are equally significant and cannot be overlooked during periods of crisis. However, it is not only exporters that adjust their trade policies; food-importing countries also reduce tariffs on foodstuffs to meet domestic food security needs. These global food security challenges cannot be addressed solely through stricter export controls. Therefore, discussions at the WTO must focus on the challenges faced by both exporters and importers, and aim to strike an appropriate balance.

### Box 5: WTO outcome for Export Restrictions

12th Ministerial Conference	13th Ministerial Conference	14th Ministerial Conference
<ul style="list-style-type: none"> <li>WFP exception decision adopted</li> </ul>	<ul style="list-style-type: none"> <li>Transparency and notification proposals discussion</li> </ul>	<ul style="list-style-type: none"> <li>No major outcome on export restrictions</li> </ul>

Source: Authors' compilation based on documents from the WTO Ministerial Conference.

## RIS Policy Briefs

- PB#152-2026 *India's AI-Enabled Bharat VISTAAR Platform: Lessons for Bridging Agricultural Information Gap in Sub-Saharan Africa* by Pratap S Birthal, Sachin Kumar Sharma and Tanya Singh
- PB#151-2026 *Advancing India Africa Blue Economy Cooperation* by Pankhuri Gaur and Ayush Tiwari
- PB#150-2026 *India-Africa Standards and Regulations: Shared Challenges and Mutual Learning* by Anil Jauhri, Jamshed Ahmad Siddiqui and Om Stutee
- PB#149-2026 *India's Drive Towards Paperless Trade: Recent Developments and the Way Forward* by Arpita Mukherjee, Prabir De, Pritam Banerjee and Geetika Gupta
- PB#148-2026 *Leveraging India-led global initiatives for India-Africa Partnership* by Sabyasachi Saha and Rugmini Devi M
- PB#147-2026 *The War in Gulf and What It Means for India's Trade and Trade Facilitation* by Prabir De, Adrija Ganguly and Srinivas Rao
- PB#146-2026 *India-Republic of Korea S&T Cooperation: Co-Creating the Future* by Sanjeev K. Varshney, Amit Kumar and Sneha Sinha
- PB#145-2026 *Rising Debt in the Global South: A Global Call to Action* by Sushil Kumar, Riddhi Lakhiani and Manmohan Agarwal
- PB#144-2026 *India-Russia Science, Technology and Innovation Cooperation: Past, Present and Future* by S. K. Varshney, Amit Kumar and Sneha Sinha
- PB#141-2026 *WTO Reform and Industrial Policy Space: An Indian Perspective for MC14* by Pritam Banerjee, Zaki Hussain, Amit Randev, Kanika Karwal and Riddhi Lakhiani
- PB#140-2026 *Investment Facilitation for Development: India's Policy Dilemma at MC 14* by Anwar H. Shaikh, Pankaj Vashisht and Vaasu Aggarwal
- PB#139-2026 *Trade and Sustainability: Imperatives for India to consider for MC14* by R V Anuradha, Rajeev Kher, Anshuman Gupta and Lakshmi Swathi Ganti
- PB#138-2026 *Multilateralism Served à la Carte: The Rise of Joint Statement Initiatives at the WTO* by Shailja Singh, Priyadarshi Dash and Pragyana Agarwal
- PB#137-2026 *Public Stockholding for Food Security at the WTO: An Unfinished Agenda* by Sachin Kumar Sharma, Suvayan Neogi, Paavni Mathur and Palkin Ratna
- PB#136-2026 *Development Dimension -The Forgotten Pillar: Special and Differential Treatment Provisions* by Abhijit Das, Paavni Mathur and Sushil Kumar
- PB#135-2026 *Reaching Finish Line of WTO Agreement on Fisheries Subsidies: Tough Road Ahead* by Mukesh Bhatnagar, Pankhuri Gaur and Ayush Tiwari
- PB#134-2026 *Recalibrating India's Quality Control Order Framework* by Rajeev Kher & Anil Jauhri
- PB#133-2026 *Harvesting Consensus or Deadlock: WTO Agriculture Negotiations Ahead of MC14* by Sachin Kumar Sharma, Talha Akbar Kamal, Alisha Goswami, Yogeshwari Mahajan, and Kamna Chaudhary
- PB#132-2026 *E-Commerce Moratorium: Issues before the 14th WTO Ministerial Conference and Way Forward* by G D Lohani, Amit Kumar and Alaknanda Mishra
- PB#131-2026 *WTO Dispute Settlement Reform – An Issue That Goes Beyond the 14th Ministerial Conference* by Atul Kaushik and Renu
- PB#130-2026 *Policy Issues Related to WTO Reform Before the 14th Ministerial Conference of the WTO* by Harsha Vardhana Singh, Atul Kaushik and Teesta Lahiri



# RIS

Research and Information System  
for Developing Countries

विकासशील देशों की अनुसंधान एवं सूचना प्रणाली

RIS specialises in issues related to international economic development, trade, investment and technology. It is envisioned as a forum for fostering effective policy dialogue and capacity-building among developing countries on global and regional economic issues. The focus of the work programme of RIS is to promote South-South Cooperation and collaborate with developing countries in multilateral negotiations in various forums. Through its following centres/forums, RIS promotes policy dialogue and coherence on regional and international economic issues.



The word “DAKSHIN” (दक्षिण) is of Sanskrit origin, meaning “South.” The Hon’ble Prime Minister of India, Shri Narendra Modi, inaugurated DAKSHIN – Global South Centre of Excellence in November 2023. The initiative was inspired by the deliberations of Global South leaders during the Voice of the Global South Summits. DAKSHIN stands for Development and Knowledge Sharing Initiative. Hosted at the RIS, DAKSHIN has established linkages with leading think tanks and universities across the Global South and is building a dynamic network of scholars working on Global South issues.



AIC at RIS has been working to strengthen India’s strategic partnership with ASEAN in its realisation of the ASEAN Community. AIC at RIS undertakes research, policy advocacy and regular networking activities with relevant organisations and think-tanks in India and ASEAN countries, with the aim of providing policy inputs, up-to-date information, data resources and sustained interaction, for strengthening ASEAN-India partnership.



CMEC has been established at RIS under the aegis of the Ministry of Ports, Shipping and Waterways (MoPS&W), Government of India. CMEC is a collaboration between RIS and Indian Ports Association (IPA). It has been mandated to act as an advisory/technological arm of MoPSW to provide the analytical support on policies and their implementation.



FITM is a joint initiative by the Ministry of Ayush and RIS. It has been established with the objective of undertaking policy research on economy, intellectual property rights (IPRs) trade, sustainability and international cooperation in traditional medicines. FITM provides analytical support to the Ministry of Ayush on policy and strategy responses on emerging national and global developments.



BEF aims to serve as a dedicated platform for fostering dialogue on promoting the concept in the Indian Ocean and other regions. The forum focuses on conducting studies on the potential, prospects and challenges of blue economy; providing regular inputs to practitioners in the government and the private sectors; and promoting advocacy for its smooth adoption in national economic policies.



FIDC, has been engaged in exploring nuances of India’s development cooperation programme, keeping in view the wider perspective of South-South Cooperation in the backdrop of international development cooperation scenario. It is a tripartite initiative of the Development Partnership Administration (DPA) of the Ministry of External Affairs, Government of India, academia and civil society organisations.



FISD aims to harness the full potential and synergy between science and technology, diplomacy, foreign policy and development cooperation in order to meet India’s development and security needs. It is also engaged in strengthening India’s engagement with the international system and on key global issues involving science and technology.



As part of its work programme, RIS has been deeply involved in strengthening economic integration in the South Asia region. In this context, the role of the South Asia Centre for Policy Studies (SACEPS) is very important. SACEPS is a network organisation engaged in addressing regional issues of common concerns in South Asia.



Knowledge generated endogenously among the Southern partners can help in consolidation of stronger common issues at different global policy fora. The purpose of NeST is to provide a global platform for Southern Think-Tanks for collaboratively generating, systematising, consolidating and sharing knowledge on South South Cooperation approaches for international development.



DST-Satellite Centre for Policy Research on STI Diplomacy at RIS aims to advance policy research at the intersection of science, technology, innovation (STI) and diplomacy, in alignment with India’s developmental priorities and foreign policy objectives.

— Policy research to shape the international development agenda —

Core IV-B, Fourth Floor, India Habitat Centre, Lodhi Road, New Delhi-110 003, India.,

Tel. 91-11-24682177-80, Email: [dgoffice@ris.org.in](mailto:dgoffice@ris.org.in), Website: [www.ris.org.in](http://www.ris.org.in)

Follow us on:



[www.facebook.com/risindia](https://www.facebook.com/risindia)



[@RIS\\_NewDelhi](https://twitter.com/RIS_NewDelhi)



[www.youtube.com/RISNewDelhi](https://www.youtube.com/RISNewDelhi)