

World Trade Organization

*Market Access Division***THREE DECADES OF TRADE CONCERNS AT THE COMMITTEE ON MARKET ACCESS:
EVOLUTION, REPETITION, AND CROSS-BODY DIFFUSION (1995-2025)**Roy Santana and Daniela Tibuleac¹**Abstract**

This paper examines how trade concern discussions in the WTO Committee on Market Access (CMA) have evolved over three decades. It studies 138 CMA trade concerns discussed between 1995 and 2025, using the WTO Trade Concerns Database, official WTO records, and statement-level text from CMA minutes. It analyses both the substance of the issues raised and the recorded form of Members' interventions, and uses related CTG minutes to examine whether CMA concerns and language also appear in the broader Goods Council. The paper documents a marked increase in the number of trade concerns, statements, and volume of recorded text, especially since the mid-2010s and more visibly after 2020. It shows that the CMA agenda has broadened beyond tariffs, taxation, quantitative restrictions, and licensing to include a wider set of non-tariff, regulatory, and administrative measures affecting trade in goods, some of which overlap with the work of other WTO bodies. The textual analysis, based on word counts, Jaccard n-gram similarity, and TF-IDF cosine similarity, shows that CMA statements have become longer and more repetitive, mainly through paraphrased reuse rather than near-verbatim copying. It also finds substantial overlap between CMA and CTG discussions, suggesting that some concerns acquire cross-body visibility not only as agenda items, but also through the framing used by Members. Exploratory analysis indicates that repetition is associated particularly with concern maturity and institutional diffusion, while issue type plays a weaker role. The findings provide a descriptive empirical perspective on how WTO Members use regular bodies to record, revisit, and transmit trade concerns before, alongside, or instead of formal dispute settlement under the Dispute Settlement Understanding (DSU).

Keywords: Economic cooperation, Committee on Market Access, trade concerns, specific trade concerns (STCs), trade frictions, transparency, development, trade diplomacy, WTO governance.

JEL classification(s): F13, F53, F55, K33.

Disclaimer: This is a working paper, and hence it represents research in progress. The opinions expressed in this paper are those of the authors. They do not represent the positions or opinions of the WTO or its Members and are without prejudice to Members' rights and obligations under the WTO. Any errors are attributable to the authors.

Acknowledgements: The authors would like to thank Cedric Pene, Christian Steidl, Roberta Lascari, Petros Mavroidis, Robert Wolfe, Adeet Dobhal, and Isabel Calderón for their useful comments. Thanks also to Edward Carandang for his skilful assistance with the data extraction from the Trade Concerns Database².

¹ Roy Santana is Senior Counsellor and Daniela Tibuleac is a Trade Policy Analyst at the Market Access Division of the World Trade Organization. Emails: Roy.Santana@wto.org and Daniela.Tibuleac@wto.org

² See WTO [Trade Concerns Database](#) (TCDB).

Table of Contents

1 INTRODUCTION	3
2 INSTITUTIONAL CONTEXT AND RECENT DEVELOPMENTS.....	4
2.1 Number and recurrence of trade concerns in the CMA	6
3 EVOLUTION OF THE CMA WORK ON TRADE CONCERNS (1995–2025)	7
4 SUBSTANCE OF THE DISCUSSIONS AT THE CMA.....	9
4.1 Types of issues discussed.....	10
4.2 WTO Agreements and provisions mentioned in CMA trade concern discussions	12
4.3 Recurrence and stickiness of concerns	14
4.4 Limited information on resolution and subsequent institutional pathways	15
5 FORM OF THE DISCUSSIONS AT THE CMA	15
5.1 Length of CMA statements.....	16
5.2 Repetition of statements across CMA meetings	18
5.3 Cross-body overlap between the CMA and the CTG.....	22
6 WHAT FACTORS ARE ASSOCIATED WITH REPETITION IN CMA STATEMENTS?	24
6.1 Institutional diffusion (concerns raised in multiple bodies).....	24
6.2 Maturity of the concern	25
6.3 Type of issue raised.....	26
6.4 Synthesis	27
7 CONCLUSIONS.....	28
ANNEX 1 DATA SOURCES AND METHODOLOGY.....	30
A.1 Data sources, scope, and units of analysis	30
A.2 Member name normalization	30
A.3 Text normalization	31
A.4 Pairing logic for matching the statements.....	32
A.4.1 CMA-to-CMA repetition	32
A.4.2 CMA-to-CTG overlap	32
A.4.3 CTG-to-CMA overlap	32
A.5 Similarity metrics and labels.....	33
A.5.1 Jaccard n-gram similarity	33
A.5.2 TF-IDF cosine similarity	33
A.5.3 Repetition labels used for the analysis.....	34
A.6 Identification of WTO provisions cited	35
A.7 Measuring the length of statements.....	36
A.8 Robustness and sensitivity	36
A.9 Reproducibility and the role of artificial intelligence tools.....	36
A.10 Limitations	37
ANNEX 2 LIST OF FIGURES	38

1 INTRODUCTION

Since its establishment in 1995, the World Trade Organization (WTO) has provided a rules-based forum in which Members can raise, explain, and question trade measures introduced or maintained by other Members. Much of this work takes place in the regular bodies responsible for administering the WTO Agreements, where Members seek clarification, monitor implementation, place concerns on the record, and contribute to institutional memory around recurring trade frictions. The Committee on Market Access (CMA) plays a distinctive role in this respect, as it oversees matters relating to tariffs, quantitative restrictions (QRs), and other market-access instruments not falling under the purview of other dedicated committees³, and it has progressively become a forum where Members raise concerns over one another's measures, seek clarification, and signal potential trade frictions.

Trade concerns are not disputes, legal claims, or findings of WTO inconsistency. Their inclusion in the formal record does not mean that the measures discussed violate WTO rules, nor that the Committee has made any legal assessment of them. Rather, they form part of the WTO's transparency, monitoring, and friction-management functions. Since these discussions take place in formal meetings, they are reflected in the minutes prepared by the WTO Secretariat. These records vary in style and level of detail over time, but many contain extensive accounts of Members' interventions and, in recent years, increasingly reproduce statements as delivered. They therefore offer a valuable record of how Members frame trade concerns, how arguments evolve across meetings, how issues appear across WTO bodies, and how the practice of discussing trade concerns has changed over the past three decades.

The CMA is a central regular body for market access in goods, yet its trade concern practice has received less sustained empirical attention than specific trade concerns in the SPS and TBT Committees, or trade concerns raised in the Council for Trade in Goods (CTG or Goods Council). This paper contributes to the empirical literature on WTO committee practice by bringing the CMA more fully into the study of trade concerns and by adding a "textual" dimension to the analysis of how such concerns evolve over time. The analysis shows that regular bodies are not merely passive transparency fora where Members place concerns on the record. They also generate repeated legal and factual discussions, contribute to institutional memory around measures that remain under discussion, and provide settings through which trade frictions may appear across WTO bodies dealing with trade in goods before, alongside, or instead of formal dispute settlement.

The CMA is a particularly useful case for studying this evolution because it sits at the intersection between traditional market-access disciplines and a broader set of regulatory and administrative measures affecting trade in goods. Its mandate covers classic issues such as tariffs, schedules, and quantitative restrictions, but its recent trade concern practice also touches on measures that may overlap with other specialized bodies. Thus, this Committee provides a useful setting in which to observe how market-access frictions are recorded, revisited, and sometimes connected to wider discussions in the WTO goods architecture.

The paper examines two related dimensions of CMA trade concern discussions: their substance and their recorded form. On **substance**, it asks how the types of issues raised in the CMA have changed since the establishment of the WTO. To address this question, the paper examines the measures brought to the Committee, the WTO Agreements and provisions invoked or associated with concerns in the formal record, the recurrence of concerns across meetings, and the extent to which the CMA's trade concern agenda has broadened over time. On **form**, it asks how Members communicate in these discussions. The paper examines changes in the volume and length of statements, whether Members reuse or reformulate language from earlier CMA meetings, and whether language used in the CMA also appears in related discussions in the CTG, which oversees the CMA's work.

The paper studies 138 trade concerns discussed in the CMA between 1995 and 2025, using the WTO Trade Concerns Database (TCDB) and official WTO records, such as meeting minutes. It focuses on the official recorded layer of CMA practice: the concerns placed on the Committee's agenda and the statements attributed to Members in the minutes. It does not try to reconstruct informal diplomacy, determine Members' motives, assess the legal merits of the measures discussed, or treat textual

³ Terms of reference of the Committee on Market Access, Decision by the General Council of 31 January 1995, WTO Doc. [WT/L/47](#) of 17 February 1995.

similarity as evidence of substantive or legal equivalence. To answer these questions, the paper uses a statement-level dataset that reproduces the text of trade concern discussions contained in the CMA minutes. A comparable dataset was prepared from official CTG minutes to examine the relationship between CMA and CTG discussions. Annex 1 provides the methodological details needed to understand and replicate the results, including a novel approach developed to compare statements.

The paper finds that CMA trade concern discussions have changed considerably in both substance and form. On the substance side, the number of trade concerns and statements has increased markedly, especially from the mid-2010s and more visibly after 2020/2021. The mix of issues has also broadened. While early CMA discussions were more concentrated on tariffs, taxation, and quantitative restrictions, which are traditionally within the mandate of the CMA, recent meetings have included a wider range of non-tariff measures, including licensing, export-related measures, SPS and TBT-related concerns, trade remedies, and other regulatory issues. At the same time, although new concerns continue to be raised, the agenda is increasingly shaped by recurring or "sticky" concerns that remain under discussion across successive meetings.

On the form side, the paper finds that the volume of text devoted to trade concerns has increased substantially. This reflects not only the larger number of concerns and participating delegations, but also an increase in the average length of statements, particularly in recent years. The paper also finds growing textual repetition across CMA meetings. This repetition is not mainly a matter of mechanical copying. It appears more often as paraphrased reuse, where delegations preserve similar factual descriptions, legal references, or policy framing while varying the wording of their statements. The analysis also shows substantial overlap between the CMA and CTG, although this should not be treated as automatic escalation. Some concerns discussed in the CMA also appear in the Goods Council, and some language used in the CMA later reappears in CTG discussions. In the dataset, repetition is more clearly associated with the maturity of a concern and its diffusion across WTO bodies than with the type of measure at issue. These findings are descriptive associations, not causal claims.

These findings should not be read as an assessment of the legal merits, trade impact, political importance, or substantive novelty of any individual concern. They provide a factual account of how CMA trade concern discussions have evolved in the formal record and show that recurrent concerns, stable positions, and cross-body discussion patterns have become increasingly visible in the Committee's work.

The paper is structured as follows. Section 2 situates the CMA's discussion practice in the broader WTO institutional context and describes recent developments relevant to trade concerns. Section 3 presents the evolution of the CMA's work on trade concerns, including the growth in concern and statement-level activity, recurrence, agenda continuity, and overlap with concerns discussed in the CTG or other WTO bodies. Section 4 examines the substance of the discussions, focusing on the types of measures raised and the WTO Agreements and provisions mentioned or associated with concerns in the formal record. Section 5 turns to the form of the discussions, analysing statement length, repetition across CMA meetings, and overlap between CMA and CTG discussions. Section 6 explores whether repetition is associated with three features of trade concerns: institutional diffusion across WTO bodies, concern maturity, and issue type. Section 7 concludes. The Annex sets out the methodological details needed to understand and replicate the results.

2 INSTITUTIONAL CONTEXT AND RECENT DEVELOPMENTS

The Committee on Market Access was established by the General Council's Decision of 31 January 1995⁴, consolidating functions previously performed under the GATT by the Committee on Tariff Concessions and the Technical Group on Quantitative Restrictions. The CMA has a broad mandate that includes supervising the implementation of tariff and non-tariff concessions, overseeing modifications and rectifications to Members' Goods Schedules, examining notifications of quantitative restrictions⁵, and addressing market-access issues not assigned to another WTO body.

⁴ See fn. 5.

⁵ Decision on Notification Procedures for Quantitative Restrictions, WTO Doc. [G/L/59/Rev.1](#) of 3 July 2012.

In the CMA context, trade concerns are instances in which one or more Members comment on, question, seek clarification regarding, or raise concerns about the WTO compatibility or trade effects of specific market-access measures introduced or maintained by another Member. Their inclusion in the dataset does not mean that the paper treats them as disputes, legal claims, or proven violations of WTO rules. Rather, the paper studies the official recorded layer of CMA practice: the formal record of concerns raised by Members in the Committee, not informal diplomacy, Members' internal deliberations or strategic considerations, or all exchanges that may take place outside the official record. Although this was not always a distinct or formalized practice, these discussions are now placed under a dedicated agenda item in formal CMA meetings and are recorded in the minutes prepared by the Secretariat.⁶

The analysis in this paper relies on the WTO Trade Concerns Database (TCDB)⁷. This choice improves transparency and reproducibility, but it also has limitations. Some discussions that resemble trade concerns may not necessarily be reflected in the TCDB. For example, concerns relating to quantitative restrictions have at times been discussed under the dedicated QR agenda item rather than as separate trade concerns, including after the revised Decision on Notification Procedures for Quantitative Restrictions was adopted in 2012⁸. Similarly, at least two previously raised concerns, although identifiable by ID, were raised under Other Business at the March 2024 CMA meeting, were not included in the TCDB, and are therefore excluded from the calculations in this paper. The TCDB may therefore not capture every discussion in the CMA that could, analytically, resemble a trade concern. Nevertheless, to maintain a clear and reproducible scope, this paper relies on the TCDB-based universe of trade concerns, complemented by official WTO records where necessary, as the basis for its calculations. On this basis, a total of 138 trade concerns were raised in the CMA from 1995 to 2025.

Trade concerns matter because they perform several institutional functions in WTO committee work. They are often an initial step used by Members to create a formal record, support transparency, seek clarification, preserve institutional memory, and manage trade frictions before or instead of formal dispute settlement under the DSU. This does not mean that trade concerns necessarily resolve disagreements, prevent disputes, or reveal Members' full motives. It means that they provide a regular committee setting in which Members can identify, discuss, and follow market-access frictions over time.

The terminology used to describe these discussions has also evolved over the years. While the concept of "specific trade concerns" was first pioneered in the WTO TBT and SPS Committees⁹, Members were slower to use the CMA in similar terms as a forum for discussing market-access tensions. In the CMA record, the first instance identified in which a Member explicitly used the expression "trade concern" was at the meeting of 29 September 2015, when Haiti responded to a statement by the Dominican Republic.¹⁰ This does not mean that Members had not previously raised concerns about one another's market-access measures in the CMA. Rather, it suggests that the vocabulary and institutional practice of treating such discussions as "trade concerns" became more visible only later in the Committee's history.

The treatment of trade concerns in the CMA has also been affected by recent procedural developments. As part of the WTO "reform by doing" discussions that took place in 2023, which focused on practical improvements to the functioning of WTO bodies, and in light of the growing prominence and regularization of trade concerns in the Committee's work, the CMA agreed to introduce a new subsection in the agenda of formal meetings, separating "new" trade concerns from "previously raised" trade concerns.¹¹ This change was applied for the first time at the October 2023 meeting.¹² The change matters for this paper because it reflects the increasing institutionalization

⁶ The way in which the WTO Secretariat prepares the minutes or summary reports varies across the different WTO bodies, and may change over time. For example, while the minutes from 1995 through November 2020 (G/C/M/73) were produced using a "reported style" since April 2021 (G/C/M/74) they follow the "verbatim style" (i.e. the statements made at the meeting are reproduced as delivered and with relatively little editing).

⁷ See WTO [Trade Concerns Database](#) (TCDB).

⁸ See fn. 7.

⁹ Mateo Ferrero, Rainer Lanz, Devin McDaniels and Erik Wijkström, 'TBT Specific Trade Concerns: What's the value?' (2022), p. 2.

¹⁰ See WTO Doc. [G/MA/M/62](#), para. 79.

¹¹ Proposals adopted by the Committee on Market Access on 16 August 2023. See WTO Doc. [G/MA/411](#).

¹² See WTO Doc. [G/MA/M/79](#).

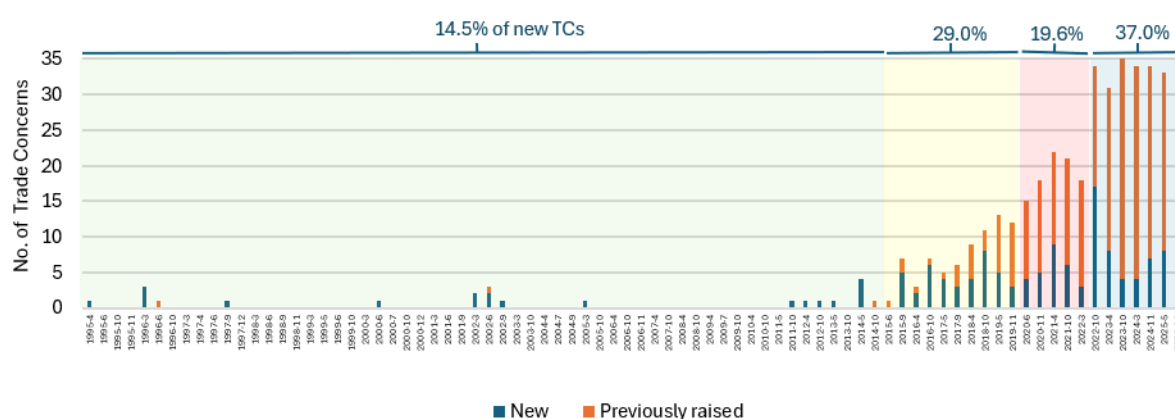
of trade concern discussions in the CMA agenda and provides a clearer distinction between new and recurring concerns in the formal record.

2.1 Number and recurrence of trade concerns in the CMA

By our count, and based on the information in the TCDB, only approximately 20 concerns were raised between 1995 and 2014 in the CMA. Activity then increased from the mid-2010s and rose more sharply from 2022, before stabilizing at a higher level in recent meetings. See Figure 1.

More than 30 trade concerns have been discussed at every CMA meeting since the CMA meeting of March 2022, reaching a peak of 35 concerns at its October 2023 and October 2025 meetings. These figures refer to the TCDB-based universe used for the calculations and do not include the two concern-like issues raised under Other Business in March 2024 that were not included in the TCDB. This considerable increase has coincided with longer CMA meetings compared with the Committee's earlier practice and has contributed to their extension from half a day to one and a half days. The introduction of new concerns has also been heavily concentrated in recent years. Approximately half of all trade concerns were first raised between 2021 and 2025, with one quarter introduced in 2021 and 2022 alone. This contrasts with the Committee's first two decades, during which only 14.5% of all concerns were raised.

Figure 1. CMA: Number of trade concerns, by meeting (1995-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

It should, however, be stressed that the high number of trade concerns discussed at each CMA meeting does not mean that all of them correspond to new issues. The segment of previously raised trade concerns has expanded faster than the number of new entries, indicating more recurring items and longer follow-through across meetings. The pattern suggests that the CMA has increasingly served as a forum in which concerns persist and accumulate over time. In their work on trade concerns at the CTG, Santana and Dobhal describe a similar pattern as one of increasingly "sticky" trade concerns.¹³ Section 6.2 returns to this issue when examining concern maturity and repeated language.

The CMA is also closely linked to the CTG, which is the umbrella body responsible for overseeing the WTO's work on trade in goods, including the work of the CMA and other subsidiary bodies. A common way of understanding this relationship is that concerns are first raised in specialized committees and later brought to the CTG when Members seek broader visibility or are not satisfied with the outcome. As Wolfe observes, "most concerns are first raised in the subsidiary technical committees then move

¹³ Santana, R., & Dobhal, A. (2024), "Canary in a Coal Mine: How trade concerns at the Goods Council reflect the changing landscape of trade frictions at the WTO", WTO Staff Working Paper ERSD-2024-04, p. 22.

up to CTG when a Member is not satisfied with an outcome."¹⁴ This captures an important feature of WTO committee practice, but the relationship is often more complex. This should not, however, be understood as meaning that a concern necessarily leaves the CMA agenda when it is raised in the CTG. In practice, the same concern may continue to be discussed in the CMA, the CTG, and sometimes other WTO bodies as well. The movement of a concern across bodies should therefore not be understood only as a linear escalation from a specialized committee to the Goods Council. It may also reflect parallel discussion, institutional reinforcement, or continuing efforts by raising Members to keep the issue visible in more than one institutional setting, including as a way of keeping pressure on the responding Member.

Existing work on specific trade concerns has emphasized their role as instruments for transparency, monitoring, and the management of trade frictions, particularly in the TBT and SPS Committees. Less attention has been paid to how similar practices have developed in the CMA and to how the language used in regular committee discussions evolves over time. This paper builds on that literature by shifting the focus from the existence of trade concerns to their recorded form: how often concerns recur, how Members frame them, and whether those framings are repeated within and across WTO bodies.

This institutional relationship is central to the analysis that follows. Section 3 examines how the CMA trade concerns have evolved over time, including their overlap with the CTG and other WTO bodies. Later sections then examine whether such overlap is associated with changes in the form and repetition of Members' statements.

3 EVOLUTION OF THE CMA WORK ON TRADE CONCERNS (1995–2025)

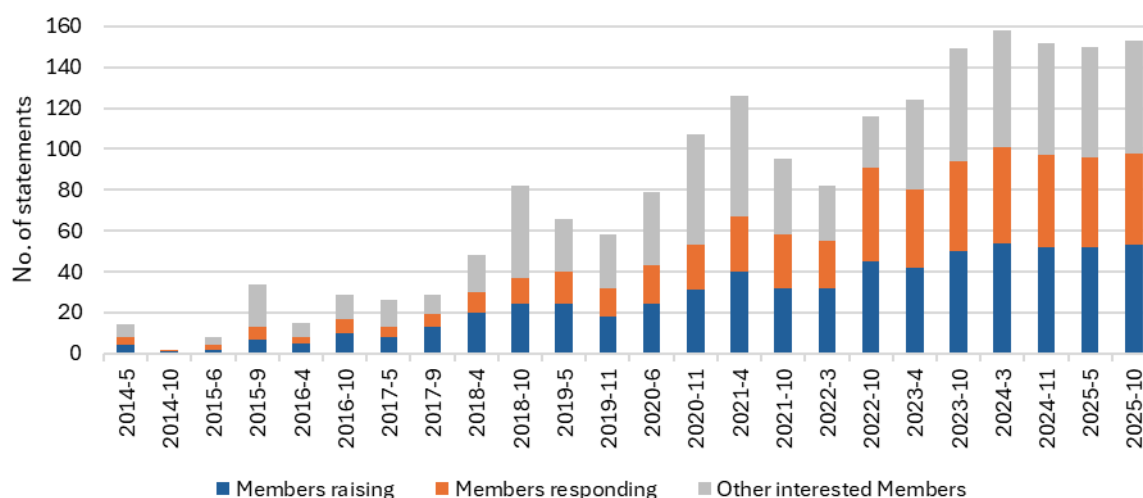
The rules of procedure of the CMA provide that it should meet as necessary, but at least once a year¹⁵. In practice, since 1995 it has consistently held at least two formal meetings per year, as well as a large number of informal meetings. As previously explained, any Member may request the inclusion of a new or recurring trade concern on the agenda of the CMA formal meetings. Other Members may also take the floor under the same concern, either to support the views of either side or to express a systemic interest in the matter. For the purposes of this paper, Members' roles are identified using the same distinction as in the TCDB: raising Member(s), responding Member(s), and other interested Member(s). The last category covers Members other than the raising and responding Members that intervene under the concern, whether to support either side or to express a broader interest in the issue.

Figure 2 shows a steady rise in statements delivered under the trade concerns agenda item, from single-digit totals per meeting in the mid-2010s to roughly 150-160 statements in peak meetings in 2023-2024. This increase reflects both the larger number of trade concerns on the CMA agenda and broader participation by Members under those concerns. It also reflects the accumulation of recurring concerns. As more concerns remain on, or return to, the agenda across meetings, the number of statements delivered in a given meeting can rise even when the number of newly raised concerns is lower. All roles expand over time, but the fastest growth is among other interested Members, pointing to more populated discussions and the emergence of ad hoc, or variable geometry, coalitions around complex concerns. The figure should therefore be read as a measure of statement-level activity in the formal records, rather than as a count of unique concerns or unique Members participating in each meeting.

¹⁴ Robert Wolfe, 'Reforming WTO Conflict Management. Why and How to Improve the Use of "Specific Trade Concerns"' (2020), p. 13.

¹⁵ Rules of Procedure for meetings of the Committee on Market Access, WTO Doc. [G/L/148](#) of 21 February 1997.

Figure 2. CMA: Evolution in the number of statements on trade concerns delivered by WTO Members in each meeting, by type of participation (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: The figure counts statements recorded under trade concerns in the TCDB, by Member role. That is, one statement per Member, trade concern, and meeting. A Member may be counted more than once in the same meeting if it intervenes under more than one concern. The category "other interested Members" follows the TCDB role coding and refers to Members other than the raising and responding Members that intervene under a concern.

The increase in the number of statements delivered per meeting is closely related to the institutionalization of trade concerns in the CMA. As shown in Figure 1 above, for almost 20 years, trade concerns appeared more sporadically in the Committee's work. From the mid-2010s, and especially from 2020/2021 onwards, they became a more regular and visible part of the CMA's formal agenda. This development reflects both newly raised concerns and previously raised concerns that continued to be discussed in subsequent meetings. The distinction between new and previously raised concerns also became more explicit in the Committee's agenda practice from October 2023, when the agenda began to separate new trade concerns from previously raised trade concerns.¹⁶ This procedural distinction does not change the nature of the underlying concerns, but it makes more visible the difference between new agenda items and recurring discussions.

The relationship between the CMA and the CTG is important for understanding the evolution of trade concern discussions. While Members may use the CTG to "elevate" a trade concern to a more political body and to give it broader visibility, this should not be understood as a clean transfer from one body to another. In practice, Members may raise a measure in the relevant subsidiary body, such as the CMA, and may also raise the same or a corresponding concern in the CTG where broader discussion is considered useful. As noted above, concerns raised in the CTG may continue to appear on the CMA agenda, and the two discussions may proceed in parallel.

This relationship is also relevant in light of previous work on trade concerns in the WTO goods area. Santana and Dobhal find that trade concerns are very rarely elevated to the General Council¹⁷, which means that the CTG may often be the last multilateral forum in the goods area in which such concerns are discussed before a related issue is raised as a dispute under the DSU. The same authors found that, while there was limited evidence of this elevation practice during the first decades of the WTO, over the past few years, an increasing number of trade concerns were subsequently associated with disputes under the DSU¹⁸. In addition, they show that the largest group of CTG trade concerns

¹⁶ See WTO Doc. [G/MA/411](#), para. 2.

¹⁷ Santana & Dobhal (2024), p. 13

¹⁸ Santana, R., & Dobhal, A. Thirty years of trade concerns at the Goods Council: How do they relate to disputes under the DSU? In *Reckoning and renewal: The World Trade Organization and its Dispute Settlement System at 30* (2025) (pp. 242-276). University of Toronto Press. <https://doi.org/10.3138/9781487570903-018>.

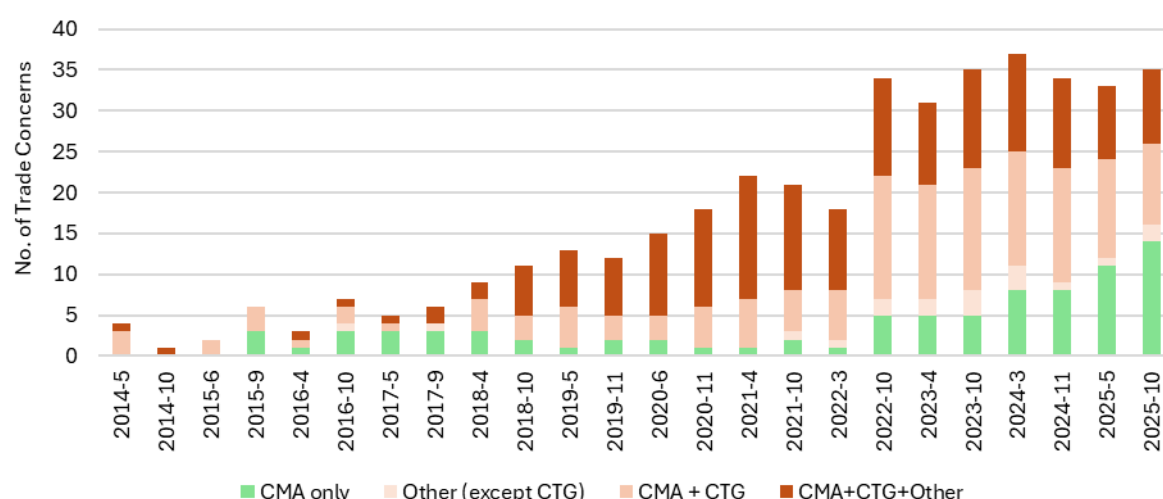
originates in the CMA (64 out of 220 trade concerns), followed by the TBT Committee (44), the Committee on Agriculture (30), and the SPS Committee (21).

This suggests that an analysis of the trade concerns raised in the CMA also needs to consider their relationship with the CTG and other WTO bodies, such as the Committee on Import Licensing and the SPS and TBT Committees. A concern may be raised in more than one body because the same measure can raise different legal, regulatory, notification, or market-access issues, or because Members may wish to address different aspects of the same measure in different institutional settings. Cross-body discussion should therefore be understood as evidence of institutional overlap, broader visibility, parallel engagement, or continued Member interest, rather than as automatic escalation or as proof that a concern was unresolved in the CMA.

The close relationship between the CMA and the CTG is shown by Figure 3, which indicates that, overall, approximately 84% of the trade concerns raised at the CMA in meetings between 2014 and 2025 are mapped in the TCDB to corresponding concerns also raised in the CTG, or in the CTG and other WTO bodies. The increased share of "CMA only" discussions in the last two meetings of 2025 should be interpreted with caution, as there may be a lag between CMA and CTG discussions, and Members may still raise those concerns in the CTG in the future.

Leaving aside this timing issue, the large degree of overlap between CMA trade concern discussions and discussions in other bodies raises the question of whether cross-body visibility is associated with differences in the way Members approach these concerns.

Figure 3. CMA: Number of trade concerns and overlap with CTG and other WTO body discussions, by meeting (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: The figure counts unique CMA trade concerns appearing on the agenda of each meeting. A concern discussed in more than one meeting is counted once per meeting. Categories reflect TCDB mappings available in 2026, including whether the same or corresponding concern was also raised in the CTG, in another WTO body, or both. "Other" refers to WTO bodies other than the CMA and the CTG, including the SPS, TBT, and import licensing Committees. The classification does not necessarily indicate that the cross-body discussion had already occurred by the date of the CMA meeting shown.

4 SUBSTANCE OF THE DISCUSSIONS AT THE CMA

This section examines what Members have raised as trade concerns in the Committee on Market Access. The statement-level CMA dataset contains 138 distinct trade concerns over the period 1995-2025. These concerns are analysed from several angles: the types of measures discussed, the WTO Agreements and provisions mentioned or associated with them, the extent to which some concerns

return to the agenda over time, and the limited information available on whether some concerns were later reported as resolved or partially resolved.

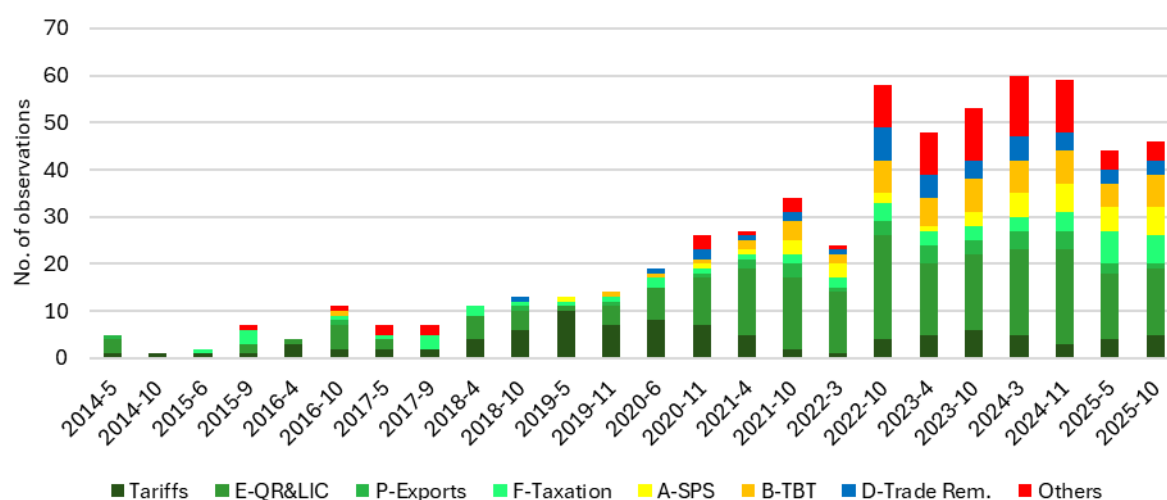
The figures in this section do not all use the same denominator. Some count distinct trade concerns. Others count concern-meeting observations, coded legal references, or classified measure-type observations. This reflects the different questions being asked. A figure showing the evolution of the CMA agenda by meeting necessarily counts the appearance of concerns over time, while a figure on WTO Agreements counts distinct concerns with coded agreement references. The relevant unit of analysis is therefore identified in the figure notes.

4.1 Types of issues discussed

The CMA's broad mandate allows Members to raise a wide range of market-access concerns affecting trade in goods. In practice, these concerns have covered applied tariff treatment, tariff-rate quotas, import prohibitions, quantitative restrictions, licensing procedures, internal taxation, customs or administrative procedures, product coverage issues, HS classification questions, notification practices, and regulatory measures affecting the conditions under which goods enter a market. Some concerns focus on a specific instrument, such as an import ban or tariff-rate quota. Others involve broader questions about how a measure is administered, implemented, or notified.

To organize this diversity of measures, the paper classifies concerns using the International Classification of Non-Tariff Measures developed by the Multi-Agency Support Team (MAST)¹⁹, supplemented by a separate tariff category. This provides a standardized taxonomy that makes the CMA agenda easier to compare across meetings and, where relevant, with other datasets. The classification is used as a descriptive tool. The assignment of concerns to MAST categories was undertaken manually from the official record. The classification is descriptive, does not determine the legal nature of a measure, and allows a concern to fall under more than one category.

Figure 4. CMA: Evolution in the types of measures raised as trade concerns (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

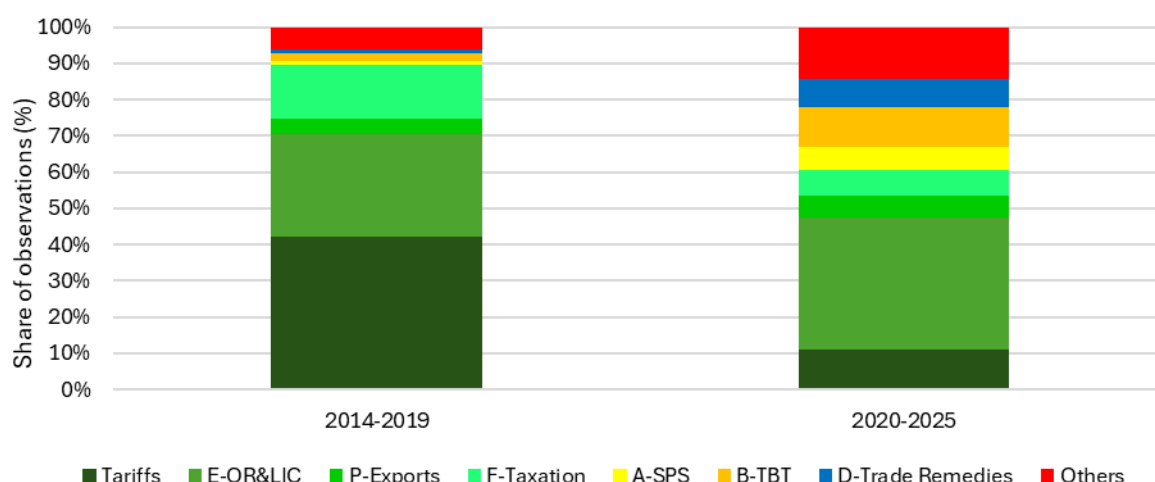
Note: The figure counts concern-meeting category observations, meaning the categories coded for each trade concern in each meeting. Categories are based on the MAST classification of non-tariff measures, with tariffs added as a separate analytical category. Categories may overlap where a concern involves more than one type of measure. "Others" groups less frequent categories, including MAST Chapters H (anticompetitive practices), I (investment measures), L (subsidies), and M (government procurement).

¹⁹ UNCTAD. [International classification of non-tariff measures, 2019 version](#). (2019) United Nations Conference on Trade and Development.

Figure 4 shows the evolution of measure types raised in the CMA over 2014-2025. As previously explained, this period is used because most CMA trade concerns are concentrated in these years, making changes in the composition of the agenda easier to observe. The figure shows that the CMA agenda has broadened over time. Earlier concerns were more concentrated in tariffs, internal taxation, quantitative restrictions, and licensing-related issues. From 2020 onwards, the mix becomes more diverse. Quantitative restrictions and licensing remain prominent, but Members also raise concerns involving SPS and TBT-related measures, trade remedies, export measures, subsidies, anti-competitive practices, government procurement-related issues, rules of origin, and other non-tariff measures.

This broader mix suggests that Members are increasingly using the CMA to raise issues that go beyond the Committee's more traditional tariff, quantitative restriction, and market-access work. Some of these measures may also fall within the subject matter of specialized WTO bodies, including those dealing with SPS, TBT, import licensing, subsidies, or trade remedies. The record does not always explain why Members choose to raise such concerns in the CMA rather than, or in addition to, those specialized bodies. The pattern nevertheless matters for this paper because it shows that the CMA has become a forum where traditional market-access questions intersect more visibly with regulatory and administrative measures affecting trade in goods.

Figure 5. CMA: Distribution of measure types raised as trade concerns (2014-2019 vs 2020-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: The figure shows the share of concern-meeting category observations in each period, meaning the categories coded for each trade concern in each meeting. Categories are based on the MAST classification of non-tariff measures, with tariffs added as a separate analytical category. Categories may overlap where a concern involves more than one type of measure. "Others" groups less frequent categories, including MAST Chapters H (anticompetitive practices), I (investment measures), L (subsidies), and M (government procurement).

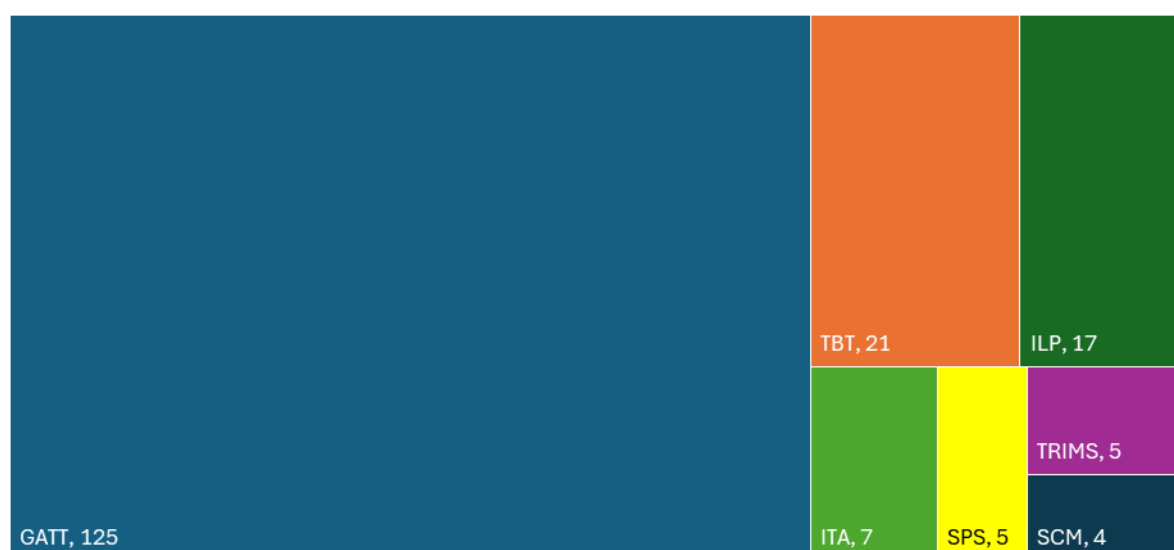
Figure 5 presents the same development in a more aggregated form by comparing 2014-2019 with 2020-2025. The comparison confirms the shift visible in Figure 4. Tariffs remain an important category, but they account for a smaller share of the issues raised in the later period. At the same time, quantitative restrictions and licensing, SPS and TBT-related measures, trade remedies, export measures, and other non-tariff categories become more visible. Taken together with the rise in the number of concerns discussed after 2020, this suggests that the CMA has moved from a more narrowly tariff-centred agenda to one in which regulatory and administrative measures affecting market access play a larger role. Section 5 returns to this point when examining the relationship between CMA discussions and discussions in other WTO bodies.

4.2 WTO Agreements and provisions mentioned in CMA trade concern discussions

Members often frame trade concerns by referring to WTO Agreements or specific provisions. These references help identify how Members present the issue in the Committee, but they should not be read as legal findings. The coding used here is descriptive and without prejudice. It does not imply that a provision was violated, that the provision was legally applicable, or that other Members accepted its relevance.

Figure 6 reports references at the agreement level. It counts unique trade concerns with coded agreement references, allowing one concern to appear under more than one agreement where several references were coded. Perhaps not surprisingly, the GATT 1994 dominates the legal framing of concerns raised at the CMA. It was mentioned or associated with 125 trade concerns in the coded set. Other WTO instruments appear less frequently but remain relevant to a meaningful subset of concerns. The TBT Agreement was referenced in 21 concerns, the Import Licensing Agreement in 17, the ITA in seven, the SPS Agreement in five, and the TRIMS Agreement in five. A residual group of concerns included references to other WTO instruments.

Figure 6. CMA: Number of trade concerns with reference to WTO Agreements mentioned in trade concern discussions (1995-2025)

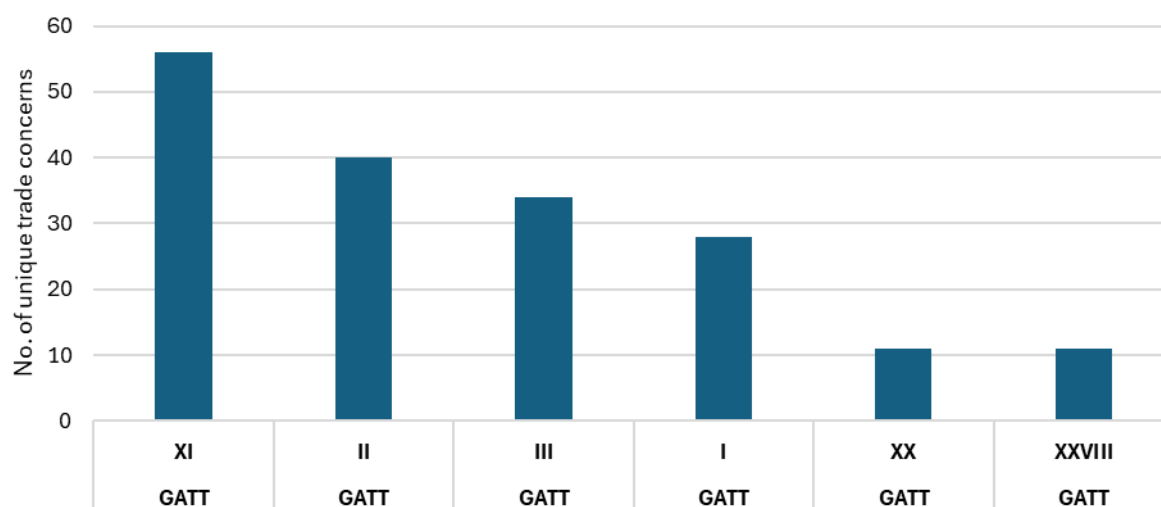


Source: Santana & Tibuleac based on the WTO TCDB.

Note: The figure counts unique trade concerns with coded agreement references. A concern may be counted under more than one agreement where more than one reference was coded. Concerns with no coded agreement reference are not shown.

This concentration around the GATT 1994 is consistent with the CMA's institutional role. The Committee deals with market access for goods, and many of the issues raised before it concern tariffs, treatment of imported products, import or export restrictions, licensing arrangements, and the administration of goods measures. At the same time, the presence of other agreements shows that CMA discussions are not framed only through the GATT. Some concerns sit at the intersection between market access and more specialized disciplines, especially where a measure has both regulatory and trade-restrictive features.

Figure 7. CMA: Main GATT provisions mentioned or associated with trade concern discussions (1995-2025)



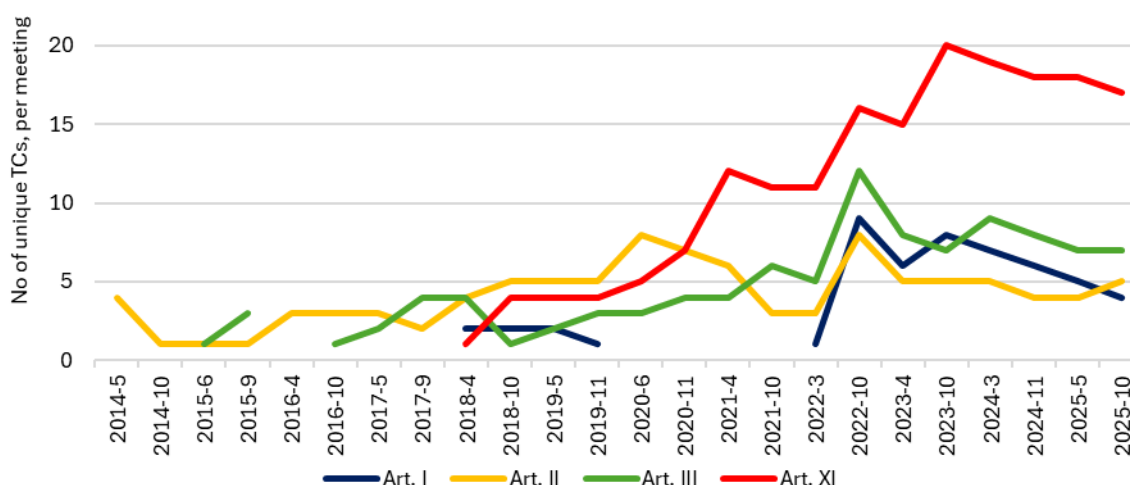
Source: Santana & Tibuleac based on the WTO TCDB.

Note: The figure counts unique trade concerns with coded references to GATT provisions. A concern may be counted under more than one provision where more than one reference was coded. Concerns with no coded GATT provision reference are not shown.

Figure 7 moves from the agreement level to the provision level within the GATT 1994. It counts unique trade concerns with coded references to GATT provisions, allowing one concern to be counted under more than one provision where several provisions were mentioned or associated with the concern. Article XI, on the general elimination of quantitative restrictions, is the most frequently referenced provision, appearing in 56 concerns. It is followed by Article II, on schedules of concessions, with 40 concerns; Article III, on national treatment on internal taxation and regulation, with 34; and Article I, on most-favoured-nation treatment, with 28. A smaller group of concerns refers to Article XX and Article XXVIII, with 11 concerns each, while Article X appears in eight concerns and Article XXI in seven.

These patterns are substantively intuitive. Concerns involving import bans, export restrictions, quotas, tariff-rate quotas, or certain licensing arrangements are often framed through Article XI. Concerns about duties, tariff treatment, or bound commitments tend to be linked to Article II. Article III appears where Members discuss internal taxes or domestic regulatory requirements affecting imported products. Article I is invoked where Members consider that treatment differs across trading partners. Article X appears in concerns involving the administration or publication of trade regulations, while Article XXVIII appears where the discussion concerns the modification of schedules or renegotiation of tariff commitments.

Figure 8. CMA: Evolution in the main GATT provisions mentioned or associated with trade concern discussions (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: The figure counts concern-meeting provision references. Each GATT provision is counted only once per trade concern and meeting.

Figure 8 shows how references to the main GATT provisions have evolved by meeting over 2014-2025. In the earlier part of the period, references to Articles II and III were relatively prominent, reflecting the continued importance of tariff treatment and internal taxation or regulation. From 2019 onwards, Article XI becomes increasingly visible. In recent years, it has been the most frequently referenced GATT provision in CMA trade concern discussions, reflecting the growing prominence of concerns involving restrictions, licensing arrangements, and other measures affecting the ability of goods to enter or leave a market.

This trend should be interpreted as a shift in legal framing, not as evidence that Article XI violations became more common. It shows that Members increasingly presented CMA concerns through the language of restrictions, prohibitions, licensing, or similar market-access limitations, which is consistent with the broader diversification of measure types shown in Figures 4 and 5.

4.3 Recurrence and stickiness of concerns

A notable feature of the CMA record is that many trade concerns are not raised only once. Some concerns appear in a single meeting and then disappear from the agenda, but others return across several meetings, and some remain on the agenda for many years. This gives the CMA agenda a cumulative character. It is not simply a sequence of new concerns; it also contains a stock of recurring issues that Members continue to revisit.

This recurrence is important for understanding the later parts of the paper. Concerns that return over time create more opportunities for Members to update, repeat, or adapt earlier arguments. They may also develop a form of institutional stickiness, where the concern remains active even if the underlying measure, the affected products, or the arguments raised by Members evolve. Section 6 examines this issue more directly through the relationship between concern maturity and textual repetition.

Recurrence should not be interpreted as a measure of legal seriousness or objective importance. A concern may recur because the measure remains in force, because implementation details change, because Members continue to seek clarification, or because the issue has become part of a broader institutional discussion. Conversely, a concern that appears only once may have been resolved, dropped, pursued elsewhere, or simply not raised again for strategic reasons.

4.4 Limited information on resolution and subsequent institutional pathways

A related question is whether concerns raised in the CMA are later reported as resolved or partially resolved, or whether they become associated with formal dispute settlement. The available information provides only indicative evidence on these pathways and does not allow for a full assessment of the CMA's effectiveness. In particular, it does not establish whether discussion in the CMA caused a concern to be resolved, or whether it prevented a dispute that would otherwise have been brought.

For resolution, the estimate draws on information published by the WTO Secretariat for the CTG in document [G/C/W/884/Rev.1](#)²⁰, which records trade concerns that Members have reported as resolved or partially resolved. At the time of writing, there was no equivalent record for the CMA. However, Members had agreed to establish a mechanism for recording the resolution of trade concerns in the CMA through the Decision circulated in document [G/MA/440](#)²¹, and an official CMA figure is expected once the Secretariat issues the corresponding report later in the year. Pending that report, a preliminary estimate can be derived by linking CMA concerns to related CTG concerns for which Members have already reported full or partial resolution. On a preliminary estimate based on these proxy links, around 36 of the 138 unique CMA concerns, or approximately 26%, appear to be potentially resolved or partially resolved.

Some CMA concerns may also be associated with WTO dispute settlement. The estimate used here builds on the dataset compiled by Santana and Dobhal²², which links CTG trade concerns to WTO dispute settlement proceedings, and complements it with additional information on more recent disputes. A conservative estimate identifies around 23 CMA concerns, or approximately 17% of the dataset, as associated with WTO disputes. A broader estimate, based on updated links using the most recent list of disputes on the WTO website, would raise the number to around 28 concerns or approximately 20%. However, these figures should be read as indicative estimates rather than definitive findings. They depend on proxy links between CMA concerns, CTG concerns, and dispute settlement proceedings, and they do not replace the official CMA resolution report to be prepared by the Secretariat. Nor should they be read as measures of success or failure. A concern may be reported as resolved or partially resolved for reasons that cannot be fully reconstructed from the minutes. Similarly, a concern may move toward dispute settlement because dialogue at the Committee level did not resolve the issue, because a Member sought a binding legal ruling, or for other legal, political, or strategic reasons.

There is also a non-negligible overlap between the two groups. Around nine CMA concerns appear both in the resolved or partially resolved group and in the dispute-linked group, rising to ten if recent candidate links are included. This overlap matters because resolution and dispute settlement should not be treated as mutually exclusive outcomes. Conversely, the absence of dispute settlement does not mean that the concern was resolved through the CMA. It may reflect continued dialogue, bilateral engagement, resource constraints, litigation strategy, or a decision not to pursue the matter further.

5 FORM OF THE DISCUSSIONS AT THE CMA

We now turn from the substance of CMA trade concern discussions to the form of Members' interventions. In this section, "form" refers to how Members raise concerns, respond to them, and signal support or systemic interest in the formal record of the Committee. The analysis focuses on three dimensions: the length of CMA statements (measured by the number of words), the extent to which delegations reuse or reformulate language from prior CMA meetings, and the extent to which language used in the CMA reappears in related discussions in the CTG.

Using the text-as-data techniques described in the Annex, we quantify these patterns at the statement level and aggregate them by meeting. This approach is inspired in part by Members' own

²⁰ Resolution of trade concerns raised in the Council for Trade in Goods. Report by the Secretariat. See WTO Doc. [G/C/W/884/Rev.1](#).

²¹ Decision on the recording of the resolution of trade concerns in the Committee on Market Access. See WTO Doc. [G/MA/440](#).

²² Santana, R., & Dobhal, A. Thirty years of trade concerns at the Goods Council: How do they relate to disputes under the DSU? In *Reckoning and renewal: The World Trade Organization and its dispute settlement system at 30* (2025) (pp. 242-276). University of Toronto Press. <https://doi.org/10.3138/9781487570903-018>.

discussions in the CTG on improving the handling of trade concerns, where questions of repetition, agenda management, and follow-up have become increasingly relevant. The purpose of the textual analysis is therefore not to reconstruct the full oral delivery of interventions, but to examine the official record through which those interventions are preserved and made available for institutional follow-up.

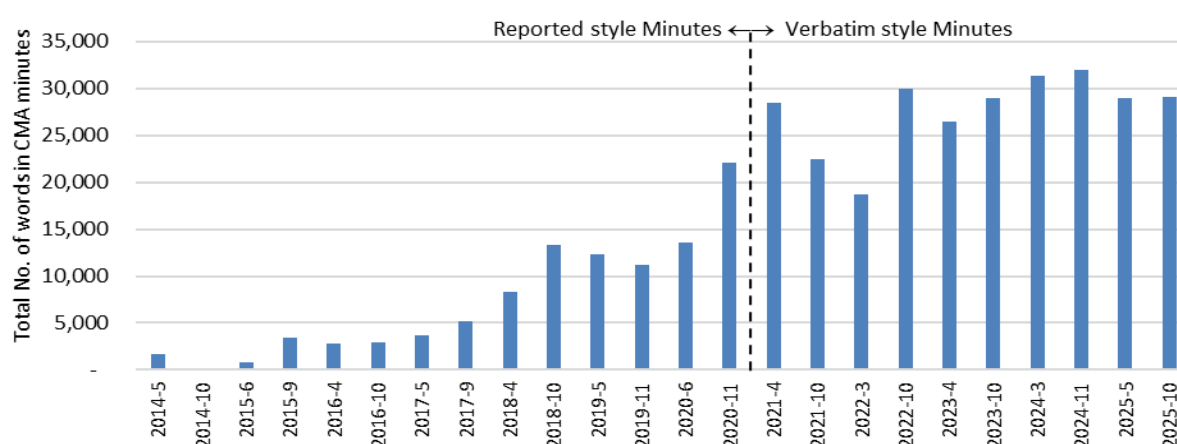
To our knowledge, this is the first application of this type of text-reuse analysis to trade concern discussions in the WTO. It provides a complementary perspective to the preceding sections: while Section 4 examined what Members discuss, this section examines how those discussions are recorded, repeated, and transmitted across meetings and bodies.

This focus on form matters because repeated wording is not only a stylistic feature of the minutes. It may indicate that Members rely on relatively settled legal and policy positions, that unresolved concerns remain on the agenda over time, or that language recorded in the CMA later reappears in other WTO bodies. For this reason, examining repetition helps connect the formal record of the Committee with the broader questions of agenda persistence and cross-body follow-up addressed in this paper.

5.1 Length of CMA statements

As shown in Figures 1 and 2, CMA meetings have included more trade concerns and more statements over time. This has led to a substantial increase in the amount of text devoted to trade concerns in the minutes of the Committee. Figure 9 captures this development by measuring the total number of words recorded in CMA statements on trade concerns at each meeting. However, this measure should be interpreted with some caution because it is based on how interventions are reflected in the minutes. In the period covered by reported-style minutes, word counts may partly reflect the way the Secretariat summarized interventions, while from the April 2021 meeting onwards the record became closer to verbatim-style minutes. The post-2021 increase may therefore reflect both changes in discussion practice and changes in recording style. The recorded increase is nevertheless substantial. In the early years covered by the figure, the total number of words was still relatively modest, while in recent meetings the trade concerns section of the minutes regularly contains close to, or above, 30,000 words per set of minutes.

Figure 9. CMA statements on trade concerns: total number of words reflected in the minutes, by meeting date (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

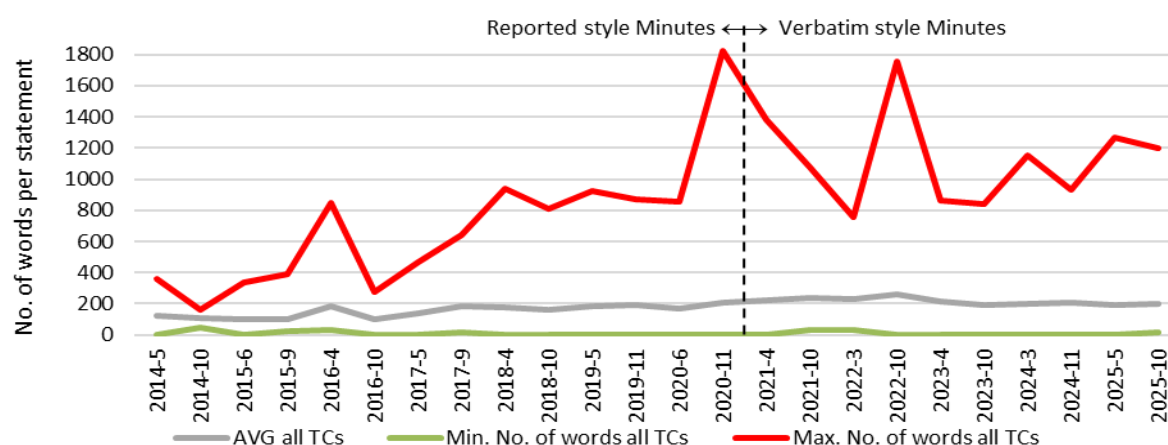
Note: Word counts are calculated on the normalized current CMA statement text. See methodology in Annex 1.

This increase in total text does not, by itself, show that delegations are speaking at greater length. It could simply reflect the fact that more concerns are being discussed and that more delegations are taking the floor. Therefore, Figure 10 examines the length of individual statements, using the

average, minimum, and maximum number of words per statement at each meeting. The chart suggests that the increase in the volume of text does not simply reflect more agenda items or more speakers. Average statement length rose from around 100-130 words per statement in the mid-2010s to around 200 words or more in many meetings after 2020. The shift is visible even after excluding missing or zero-word entries. However, this pattern should again be read in light of the recording caveats noted above.

At the same time, statement length remains highly uneven. The minimum and maximum series show that the change is not uniform across all interventions: short statements remain present, while some meetings contain individual statements of more than 1,000 words and, in a few instances, close to 2,000 words. This suggests that peaks in total word count are partly driven by a limited number of very long interventions, rather than by a general increase in the length of all statements.

Figure 10. CMA statements on trade concerns: average, minimum, and maximum number of words, by meeting date (2014-2025)

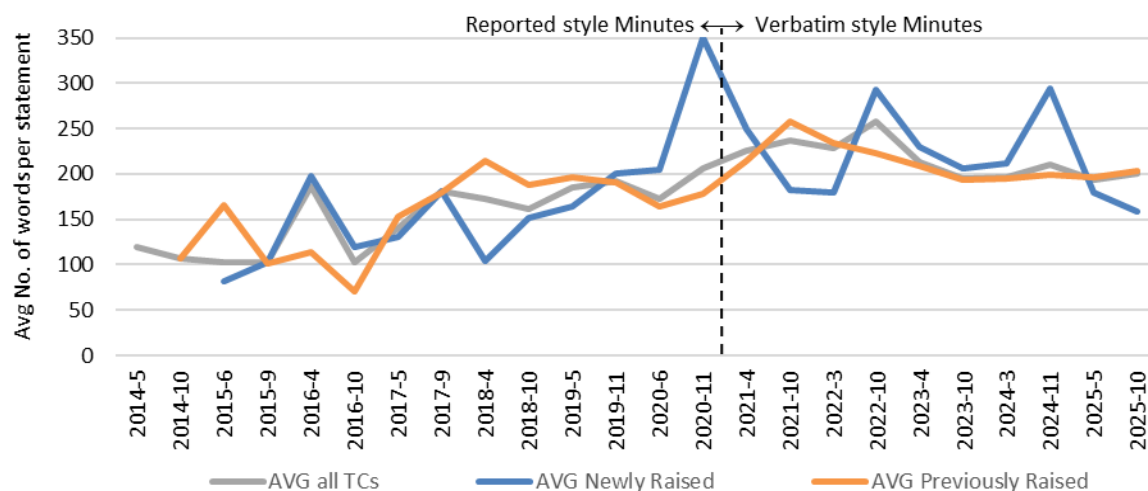


Source: Santana & Tibuleac based on the WTO TCDB.

Note: Word counts are calculated on the normalized current CMA statement text. See Annex 1. Missing or zero-word entries, including situations where a Member sponsored or responded to a trade concern but did not take the floor at the meeting, are excluded from the length statistics.

Figure 11 further distinguishes between statements made under newly raised concerns and those made under previously raised concerns. This distinction is useful because longer statements may be expected when a concern is raised for the first time, as Members may need to describe the measure, explain the factual background, and introduce the legal or systemic basis of the concern. However, the figure shows that previously raised concerns also account for long interventions in recent years. This suggests that the expansion in statement length is not limited to new concerns. Recurrent concerns can also generate lengthy interventions where the measure remains unresolved, Members update their previous positions, or more delegations intervene as other interested Members.

Figure 11. CMA statements on trade concerns: average number of words per statement, newly raised and previously raised concerns, by meeting date (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: "Previously raised" and "newly raised" refer to the status of the trade concern in the CMA agenda. Word counts are calculated on the normalized current CMA statement text. See Annex 1.

Taken together, Figures 9 to 11 indicate that the growth of the trade concerns agenda has affected not only the number of items and interventions, but also the volume and form of the written record. The trade concerns section of the minutes has become longer because there are more issues, more speakers, and longer recorded statements. This matters for the interpretation of repetition in the following subsection. Longer statements create more space for delegations to restate legal positions, factual descriptions, and formulations used in previous meetings. The length analysis should therefore be read as part of the broader evolution in how trade concerns are recorded and pursued in the CMA, rather than as a purely mechanical feature of the minutes.

5.2 Repetition of statements across CMA meetings

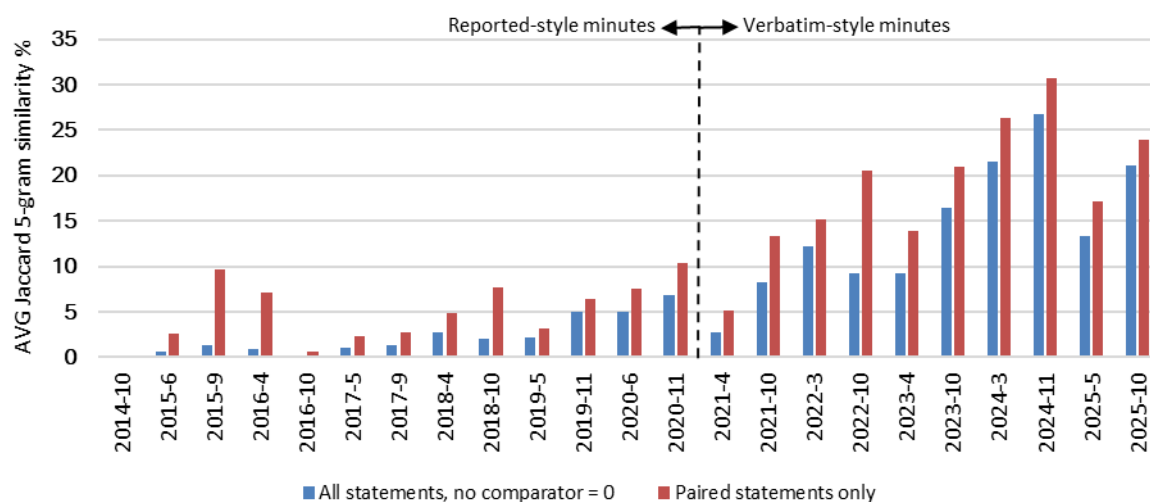
A second dimension of the form of CMA discussions concerns the extent to which the official record shows similar wording or vocabulary across CMA meetings. This matters because repeated or reformulated statements show how concerns are maintained in the formal record, how Members preserve positions over successive meetings, and how the CMA serves as a forum for continued monitoring rather than one-off discussion. This section deals only with CMA-to-CMA comparisons. Cross-body comparisons between the CMA and the CTG are addressed in Section 5.3 below.

For each current CMA statement at meeting N, the analysis compares it with a prior statement by the same delegation under the same trade concern, using a three-meeting look-back window: first N-1, then N-2, and finally N-3. If no prior statement by the same delegation under the same concern was found within that window, the statement was classified as having "No comparable prior statement". This last category should not be read as "fresh text". It means that no eligible prior statement was available for comparison within the specified time window. It is a pairability category, not a textual-similarity label, and it is not always equivalent to the concern being raised for the first time. Most cases in this category correspond to the first meeting of the concern, while most of the remainder correspond to delegations speaking for the first time on an existing concern.

Figure 12 reports the average Jaccard 5-gram similarity score by meeting. The Jaccard measure captures exact overlap in short sequences of words and is therefore especially useful for detecting near-verbatim reuse. The figure shows an increase in exact wording overlap in the formal record over time. In the mid-2010s, average Jaccard 5 scores were generally very low. By contrast, from 2021 onwards the scores become visibly higher, reaching their highest levels in 2024 and remaining elevated in October 2025. The same pattern is visible whether observations with no comparable prior statement are counted as zero in the all-statements series or whether the analysis is limited

to paired statements only. The two series should, however, be read differently. The all-statements series preserves the full statement-level time series by assigning zero similarity to cases with no eligible comparator. The paired-statements-only series is a more direct measure of repetition intensity among statements for which comparison is possible.

Figure 12. CMA statements on trade concerns: Degree of repetition, measured by average Jaccard 5-gram similarity, by meeting (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

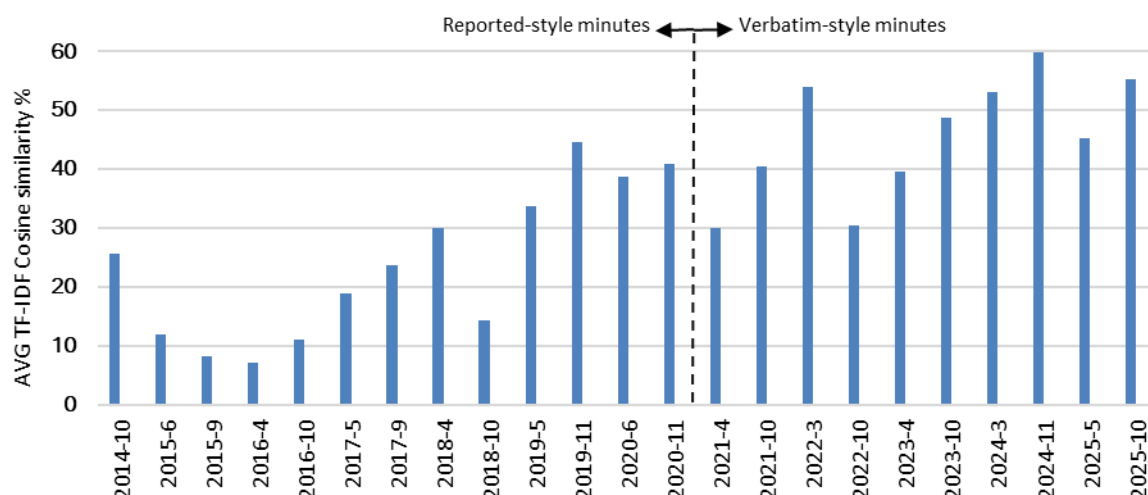
Note: Jaccard 5-gram similarity is calculated on normalized official English statement text. The all-statements series assigns zero to observations with no comparable prior statement; the paired-statements-only series excludes them. The vertical line marks the April 2021 shift from reported-style to verbatim-style minutes.

The increase in Jaccard similarity should, however, be interpreted carefully. First, Jaccard is a stringent measure. It captures repeated wording, but it does not fully capture situations where a delegation restates the same position using different words. Second, the shift from reported-style minutes to verbatim-style minutes from April 2021 onwards affected the comparability of the statements. Verbatim-style minutes preserve more of the language actually delivered by delegations, which may make repeated formulations easier to detect. The increase in the metrics after 2021 is, therefore, likely to reflect both changes in discussion practice and changes in the way those discussions are recorded.

A further caveat concerns language and translation. The analysis is conducted on the official English text recorded in the minutes. Where statements were originally delivered in French or Spanish and later reflected in English, textual similarity may be affected by translation choices. This may reduce or alter measured overlap where the underlying position is similar but the English wording differs, or conversely increase apparent similarity where standardized translation choices are repeated across meetings. The results should therefore be interpreted as similarity in the official English record, not necessarily as similarity in the original oral delivery.

Figure 13 complements this analysis using TF-IDF cosine similarity. Unlike Jaccard, which focuses on repeated word sequences, TF-IDF cosine captures weighted lexical similarity and is more tolerant of reformulation. The figure shows a stronger and more persistent increase than the Jaccard series. Average TF-IDF cosine similarity rises markedly after 2019 and remains high in several recent meetings, including 2024 and October 2025. This suggests that the official record shows not only repeated phrases, but also recurring vocabulary, factual descriptions, and legal or policy framing across successive CMA meetings. TF-IDF cosine similarity is not, however, a semantic measure. It does not establish that two statements have the same legal meaning, negotiating purpose, or substantive implication.

Figure 13. CMA statements on trade concerns: Degree of repetition, measured by average TF-IDF cosine similarity, by meeting (2014-2025)

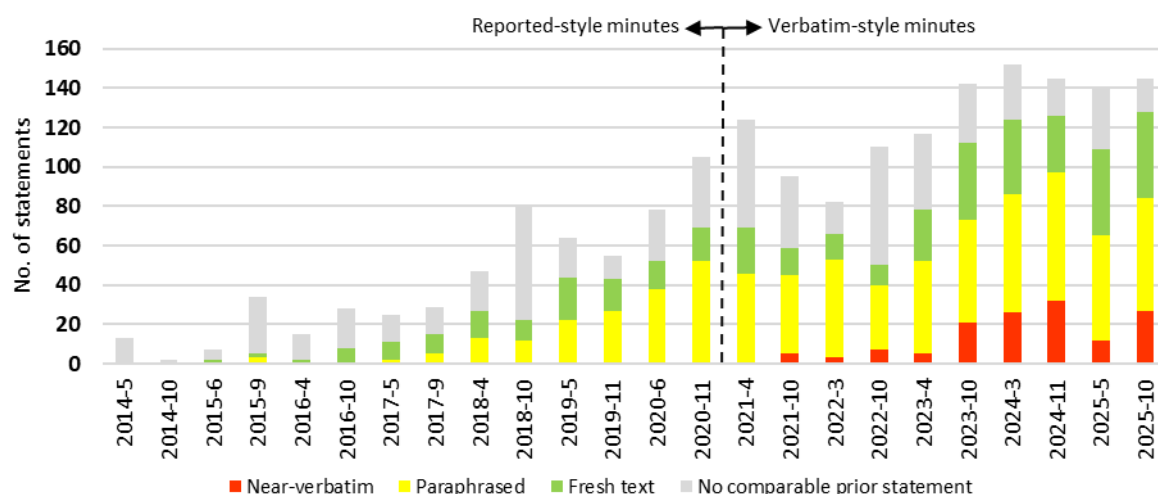


Source: Santana & Tibuleac based on the WTO TCDB.

Note: TF-IDF cosine similarity is calculated on normalized official English statement text for CMA statements with an eligible prior comparator. The vertical line marks the April 2021 shift from reported-style to verbatim-style minutes.

Figure 14 translates these similarity scores into statement-level outcomes by meeting. It reports the three textual-similarity labels, "near-verbatim", "paraphrased", and "fresh text", and shows "No comparable prior statement" separately for statements where no prior comparator was identified. The figure confirms that the increase in repetition is not mainly a story of near-verbatim reuse. Near-verbatim statements become more visible in recent meetings, especially in 2023-2025, but paraphrased reuse remains more common. This means that the dominant form of repetition is not exact copying, but the recurrence of similar vocabulary, factual descriptions, and legal or policy framing with some textual variation. The period split in Table 1 provides a more detailed view of this pattern by showing how repetition labels vary by delegation role before and after the change in minute-taking style. This remains an operational classification based on the thresholds described in Annex 1 and does not imply that semantic equivalence was manually verified.

Figure 14. CMA statements on trade concerns: Statement-level composition by repetition outcome and meeting (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: "No comparable prior statement" is a pairability category. "Fresh text", "paraphrased", and "near-verbatim" are textual-similarity labels applied only where a comparable prior statement exists. The vertical line marks the April 2021 shift from reported-style to verbatim-style minutes.

Taken together, Figures 12 to 14 suggest that the official record of CMA trade concern discussions contains an increasing reappearance of similar wording or vocabulary over time. As will be discussed in Section 6.2, this pattern appears to be associated with the recurrence of trade concerns across meetings (i.e. the stickiness of trade concerns in the agenda) and the fact that delegations may rely on formulations used in earlier meetings while updating them to reflect subsequent developments. It should be noted that this does not necessarily mean that statements are mechanically copied from one meeting to the next. The evidence suggests instead that, where comparable prior statements exist, delegations often reuse or reformulate factual descriptions and legal or policy framing across successive CMA meetings.

The degree of textual similarity also varies depending on the **role played by the delegation** under the trade concern: raising, responding, or other. Given the change in the style of CMA minutes in 2021, and the fact that near-verbatim classifications appear only after this change in the paired observations reported here, the period split is useful for interpreting the role-specific patterns. Table 1 reports the distribution of repetition labels among statements with an eligible prior comparator, distinguishing between the reported-style minutes period, 2014-2020, and the verbatim-style minutes period, 2021-2025.

The clearest difference concerns near-verbatim repetition. No paired statement is classified as near-verbatim in 2014-2020. In 2021-2025, by contrast, near-verbatim statements account for 9.2% of paired raising statements, 16.3% of paired responding statements, and 21.1% of paired statements classified as other. This suggests that aggregate figures for 2014-2025 may understate the degree of exact wording overlap visible in the official record during the period in which the minutes allow such overlap to be detected more reliably.

Table 1: CMA statements with a paired prior statement, by role and repetition category, 2014-2025

Role of the Member	Period	No. of statements with comparable prior statement (n)	Near-verbatim share (%)	Paraphrased share (%)	Fresh text share (%)
Raising	2014-2020	120	0.0	65.8	34.2
	2021-2025	371	9.2	65.5	25.3
Responding	2014-2020	59	0.0	71.2	28.8
	2021-2025	252	16.3	47.2	36.5
Other	2014-2020	122	0.0	46.7	53.3
	2021-2025	298	21.1	47.3	31.5
Total	2014-2020	301	0.0	59.1	40.9
	2021-2025	921	15.0	54.6	30.4

Source: Santana & Tibuleac based on the WTO TCDB.

Note: The table covers CMA statements on trade concerns between 2014 and 2025 with an eligible prior comparator. Rows with no comparable prior statement or missing current text are excluded. "Fresh text", "paraphrased", and "near-verbatim" are textual-similarity labels applied only to paired statements. The period split follows the shift from reported-style to verbatim-style CMA minutes.

The shift in minute-taking style is not, however, the only possible explanation. The more recent period also includes more recurring or "sticky" trade concerns, as discussed below. Where the same concern remains on the CMA agenda across successive meetings, delegations may be more likely to rely on established factual descriptions, legal references, or policy formulations, while updating them to reflect later developments.

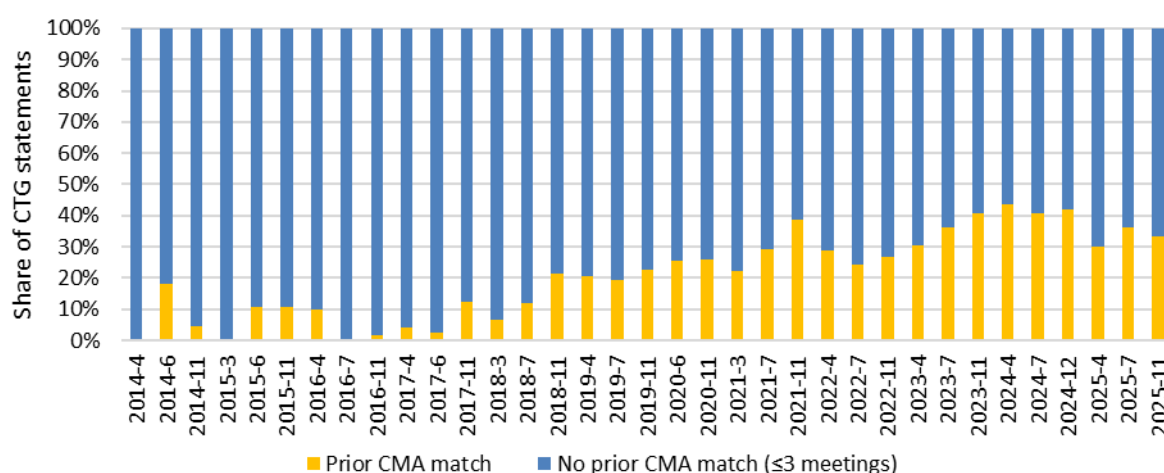
The role-specific patterns also differ. Statements by raising Members show a decline in fresh text, from 34.2% to 25.3%, while paraphrased language remains broadly stable. Statements by responding Members show more near-verbatim language in the later period, but also a higher share of fresh text and a lower share of paraphrased statements. Statements classified as "other" show the clearest movement away from fresh text, which falls from 53.3% to 31.5%. It should, however, be noted that these results are descriptive and do not address the reasons why the wording was reused, reformulated, or newly introduced.

5.3 Cross-body overlap between the CMA and the CTG

The previous subsection examined whether the official record shows recurring wording or vocabulary across CMA meetings. A related question is whether discussion in the CMA also appears in the broader CTG discussions. This matters because it helps show whether concerns discussed in the specialized market-access forum remain confined there or also acquire cross-body visibility in the Goods Council. The analysis does not treat such overlap as equivalent to procedural escalation. Instead, it examines whether the official English record shows continuity between the two bodies in the concerns raised and, where statements can be paired, in the language used by delegations.

A useful way to begin is from the CTG side. Figure 15 asks how often CTG statements under trade concerns can be linked back to recent prior statements in the CMA by the same delegation. This provides a direct indication of the extent to which discussion in the CMA is later reflected in the Goods Council. The figure shows that a substantial share of CTG statements have such a prior CMA match. This is consistent with the CMA's role as a specialized forum in which positions may be recorded before they later reappear in the broader Goods Council. At the same time, not all CTG statements have a prior CMA match. Some concerns may originate in one of the other 13 subsidiary bodies, and some may simply not have a recent prior CMA statement by the same delegation within the three-meeting window used by the methodology.

Figure 15. CTG statements on trade concerns: Share with and without a prior CMA match, by meeting (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: A "prior CMA match" means that the CTG statement was paired with an earlier CMA statement by the same delegation under a mapped concern within the previous three CMA meetings. Sample: CTG statements from 2014-2025.

The existence of a prior CMA match does not, by itself, show textual repetition. It shows only that the same delegation had previously spoken in the CMA under a mapped concern within the defined look-back window. The next step is, therefore, to reverse the perspective and take the CMA statement as the starting point. Figure 16 asks whether a CMA statement was followed by a related CTG statement by the same delegation under a mapped concern within the next three CTG meetings, and if so, how similar the later CTG wording was to the earlier CMA wording.

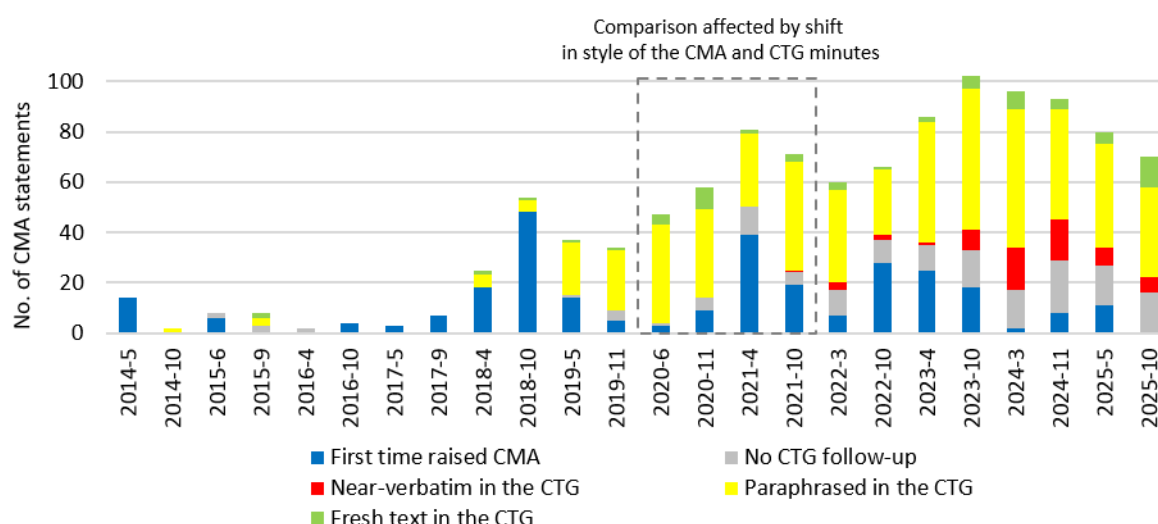
This forward comparison captures a different aspect of cross-body overlap. Figure 15 shows how much CTG discussion appears to have a recent antecedent in the CMA. Figure 16 shows whether statements first recorded in the CMA later reappear in the CTG, and with what degree of textual similarity. Read together, the two figures provide complementary evidence on cross-body continuity. At the same time, the comparison should be interpreted with some caution because the style of the

official minutes changed over time in both bodies, from more reported records to more verbatim records. In the CTG, the change took place in June 2020, while in the CMA it took place in April 2021. Moreover, because the pairing rules look back or forward up to three meetings, the effect of this transition is not confined to the exact changeover dates. Although this affects the comparability of the statements across these two bodies, particularly between 2020 and 2021, our analysis continues to capture meaningful patterns in the official English record.

Figure 16 indicates that CMA statements are not isolated within the Committee. A meaningful number are followed by related CTG statements and, when that happens, the most common form of reuse is paraphrasing rather than exact repetition. Near-verbatim carry-over also appears, but to a lesser extent. This suggests that when concerns are discussed in both bodies, delegations often preserve the same underlying framing while adapting the wording to the broader institutional setting of the Goods Council.

The category "No CTG follow-up" does not mean that a concern was unimportant, resolved, or absent from wider discussion. Rather, it means that, within the next one, two, or three CTG meetings, the methodology did not identify a later CTG statement by the same delegation under a mapped concern. Meeting calendars, agenda management, and the choice of which delegation takes the floor all affect whether such a match appears in the official record. For that reason, the absence of a matched follow-up should be read as the absence of observed textual carry-over within the chosen window, not as evidence of substantive failure or success.

Figure 16. CMA statements on trade concerns linked to the CTG: Number of statements by meeting and subsequent CTG follow-up outcome (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: The chart includes only CMA statements under concerns that have at least one mapped CTG counterpart. "No CTG follow-up" means that no later CTG statement by the same delegation was identified under a mapped concern within the next one, two, or three CTG meetings. Similarity labels are operational categories based on normalized official English statement text. See Annex 1.

Taken together, Figures 15 and 16 show substantial cross-body continuity between the CMA and the CTG. From the CTG perspective, a sizeable share of CTG discussion appears to be preceded by related discussion in the CMA. From the CMA perspective, a meaningful number of statements are later followed by CTG statements that reuse similar wording, most often through paraphrasing rather than exact repetition. This is consistent with the view that the CMA often serves as a specialized forum in which delegations first articulate and refine positions that may later appear in the broader Goods Council. It should, however, also be noted that, because concerns are often raised repeatedly in both bodies over several years, it is not possible to determine from this analysis alone whether changes in wording move primarily from the CMA to the CTG, from the CTG back to the CMA, or

reflect broader parallel evolution across both records. A broader interpretation of these patterns is taken up in Section 6, while the limited evidence on resolution is addressed separately and only briefly.

6 WHAT FACTORS ARE ASSOCIATED WITH REPETITION IN CMA STATEMENTS?

The previous section showed that the official record of CMA statements contains increasing textual repetition over time. This section asks whether that repetition is concentrated in particular types of concerns by examining three dimensions: institutional diffusion, concern maturity, and issue type. **Institutional diffusion** refers to whether a concern remains confined to the CMA or is also raised in the CTG and/or other WTO bodies. **Concern maturity** refers to the recurrence of the same trade concern across CMA meetings. **Issue type** is measured through selected MAST chapters, with tariff measures added as a separate category because of their importance in the CMA.

Like the previous sections, the analysis focuses on 2014-2025, because the earlier years contain relatively sparse and irregular CMA concern activity. The analysis remains descriptive. It does not test whether institutional diffusion, maturity, or issue type causes repetition. Rather, it identifies patterns that may help explain where repeated language is most concentrated in the official English record of CMA minutes.

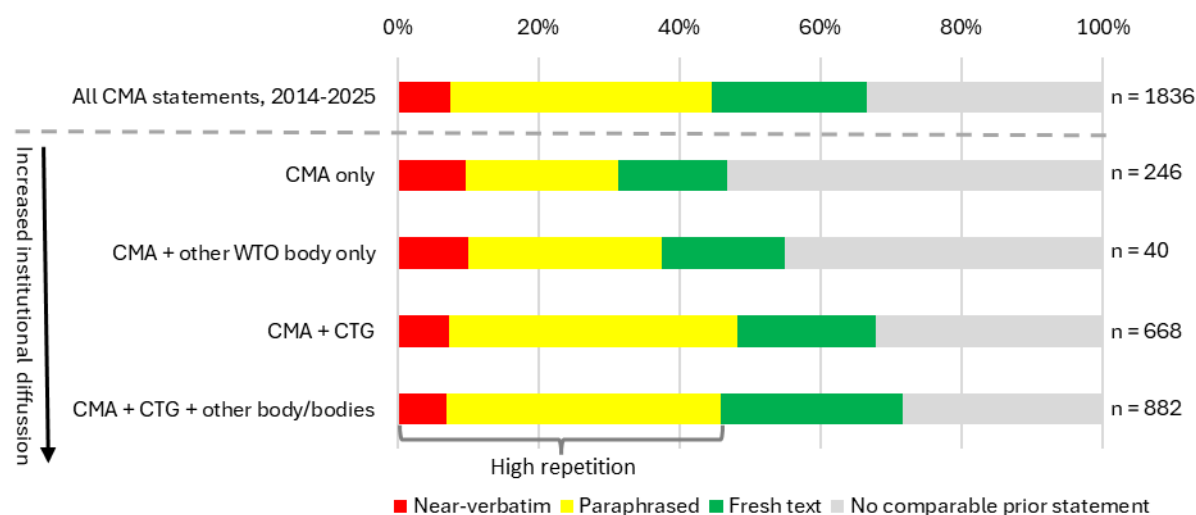
The figures in this section distinguish between pairability and textual similarity. "No comparable prior statement" is a pairability category: it means that no eligible prior statement by the same delegation under the same CMA concern was identified within the three-meeting look-back window. It *is not* a measure of textual freshness. By contrast, "fresh text", "paraphrased", and "near-verbatim" *are* textual-similarity labels applied only where a comparable prior statement exists. The figures should therefore be read as statement-level composition charts: they show both how much of the statement universe is pairable and, within the pairable subset, how repeated the wording is.

For readability, this section also uses the term "high repetition" to refer to the combined share of paraphrased and near-verbatim statements. This aggregates the two main repetition patterns identified in the previous section, while keeping them distinct from "fresh text" and from the separate category "No comparable prior statement".

6.1 Institutional diffusion (concerns raised in multiple bodies)

The first dimension is institutional diffusion: whether a CMA concern remained confined to the CMA or was also raised in the CTG and/or other WTO bodies. The underlying question is whether concerns that circulate across WTO bodies are more likely to generate stable or repeated formulations, either because delegations present consistent positions across fora, because the issue becomes part of a broader institutional strategy, or because repeated discussion in several bodies encourages the use of established language.

Figure 17. Statement-level composition of CMA statement outcomes, by institutional diffusion (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: Shares are calculated over current CMA statements for 2014-2025. "No comparable prior statement" is a pairability category. "Fresh text", "paraphrased", and "near-verbatim" are textual-similarity labels applied only where a comparable prior statement exists.

Figure 17 shows that institutional diffusion is associated not only with differences in textual similarity, but also with differences in pairability. For concerns raised only in the CMA, 53.3% of current statements have no comparable prior statement. This share falls to 32.2% for concerns also raised in the CTG and to 28.3% for concerns raised in the CMA, the CTG, and other WTO bodies. This is consistent with the idea that concerns raised across multiple WTO bodies are more often recurring concerns, creating more opportunities for the same delegation to return to earlier language.

The figure also shows that high repetition is more frequent where the concern has broader institutional visibility. Among the full universe of current CMA statements, high repetition accounts for 31.3% of CMA-only statements, 48.2% of statements on concerns also raised in the CTG, and 45.9% of statements on concerns raised in the CMA, the CTG, and other WTO bodies. The smaller category of concerns raised in the CMA and another WTO body, but not in the CTG, shows a high-repetition share of 37.5%, although this group contains only 40 current CMA statements and should be interpreted cautiously.

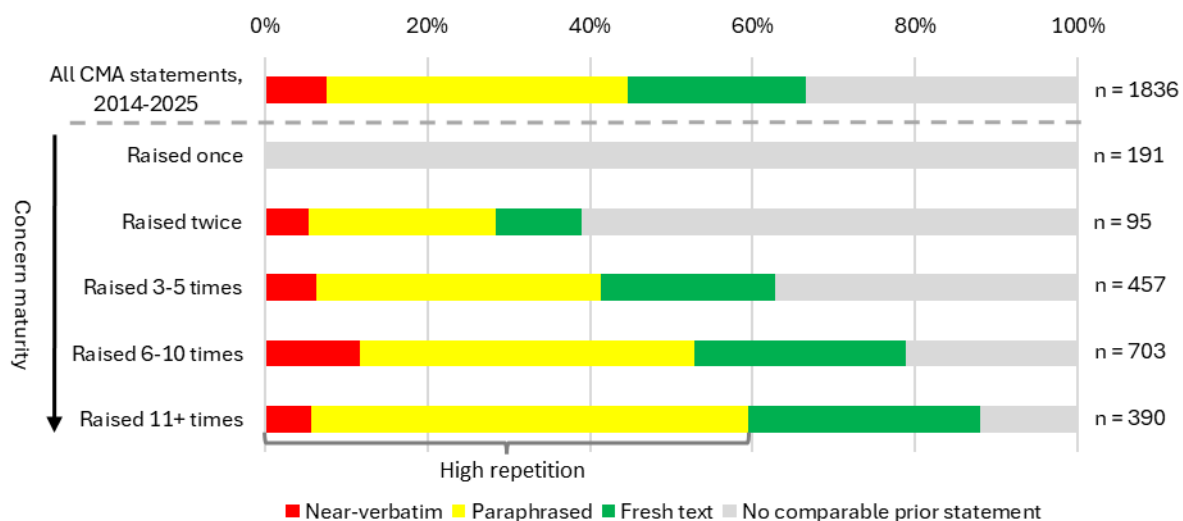
Looking only at statements with a comparable prior statement, the aggregate 2014-2025 benchmark is 11.3% near-verbatim, 55.7% paraphrased, and 33.0% fresh text. As shown in Table 1, however, these aggregate figures combine the reported-style and verbatim-style minutes periods and should therefore be read together with the period split. The same broad pattern appears within the institutional-diffusion categories: paraphrased reuse is consistently larger than near-verbatim repetition. This suggests that institutional diffusion is not mainly associated with exact or near-exact copying. Rather it appears to be more strongly associated with the restatement of similar positions with some textual variation.

These results suggest that concerns with broader institutional diffusion tend to be more recurrent and more visible, and often involve stable legal or policy positions that reappear across meetings and bodies. This is cross-body visibility, not necessarily procedural escalation.

6.2 Maturity of the concern

The second dimension relates to maturity, measured by the total number of CMA meetings in which the same trade concern was raised. This captures recurrence or persistence in the CMA agenda, not the legal merit, policy importance, or objective seriousness of the concern. As explained in Section 3, trade concerns have become increasingly recurrent in the CMA, with some concerns remaining on the agenda across many meetings.

Figure 18. Statement-level composition of CMA repetition outcomes by concern maturity (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: Shares are calculated over current CMA statements for 2014-2025. Concern maturity is measured by the total number of CMA meetings in which the same trade concern was raised.

Figure 18 shows a clear association between concern maturity and the distribution of statement outcomes. Concerns raised only once are, by construction, classified as having no comparable prior statement because there is no earlier CMA discussion of the same concern to compare against. They are included in the chart for completeness, but the meaningful comparison begins with concerns raised at least twice. From that point onwards, the share of statements classified as paraphrased or near-verbatimim increases with the number of times the concern has been raised. High repetition rises from 28.4% among concerns raised twice to 41.4% for concerns raised three to five times, 52.8% for concerns raised six to ten times, and 59.5% for concerns raised eleven or more times.

As in Figure 17, the decline of the grey segment across maturity categories mainly shows that recurrent concerns are more likely to have a recent prior statement by the same delegation, creating the conditions for detectable textual reuse. Its presence among mature concerns should not be read as meaning that the concern itself is new; it means only that no comparable prior statement was found within the three-meeting look-back window.

Among statements for which a comparable prior statement exists, paraphrased reuse remains the dominant outcome across concern-maturity categories. Near-verbatimim reuse is present, but remains smaller and less consistent. This indicates that repetition in mature concerns generally takes the form of reformulated language rather than exact or near-exact repetition.

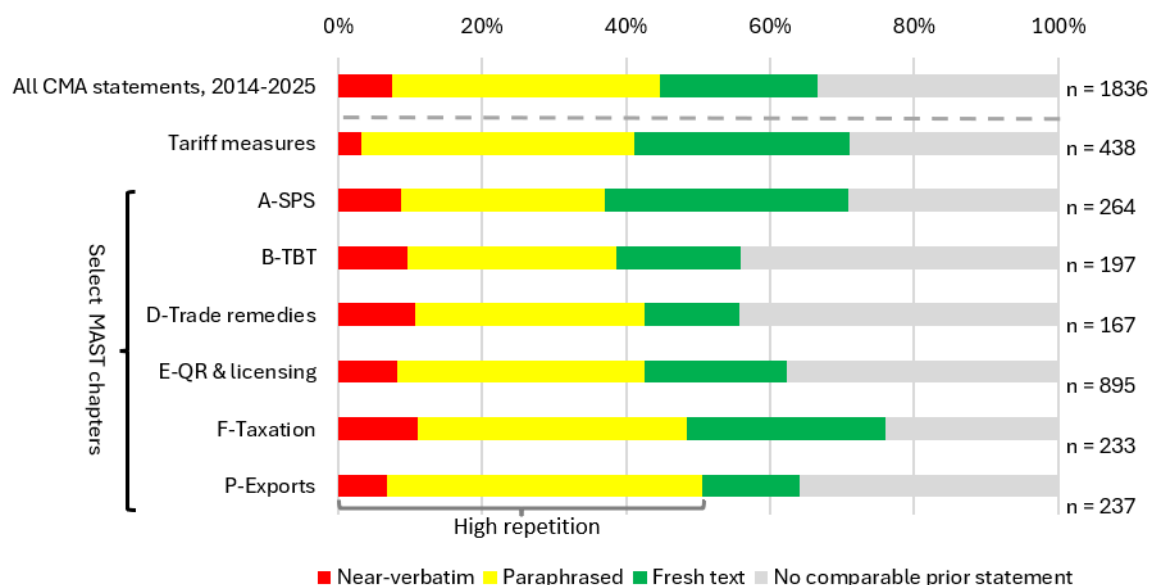
These results do not prove that maturity causes repetition. They show that repeated discussion of a trade concern is strongly associated with a higher share of repeated language. One possible interpretation is that, as concerns become institutionalized in the CMA agenda, the recorded discussion tends to rely on more settled formulations, which may help Members to preserve consistency, reduce drafting effort, and signal the continuity of their positions. The pattern may also reflect limited change in the underlying measure or limited progress in addressing the concern, leading delegations to restate similar arguments over successive meetings.

6.3 Type of issue raised

The third dimension is the type of issue raised. Issue type is measured using selected MAST chapters, focusing on the categories identified in Section 4.1 as the most frequent in the CMA data: QR and licensing, exports, taxation, SPS, TBT, and trade remedies. Tariff measures are included as a separate category because of their importance in the CMA, even though they are not a MAST chapter.

Because a single trade concern may involve more than one type of measure, these categories are not mutually exclusive. A statement may therefore be counted under more than one issue category.

Figure 19. Statement-level composition of CMA statement outcomes by selected issue category (2014-2025)



Source: Santana & Tibuleac based on the WTO TCDB.

Note: Shares are calculated over current CMA statements for 2014-2025. Issue categories are not mutually exclusive. Tariff measures are included separately from the MAST chapters. Totals across categories therefore do not add up to the total number of CMA statements.

Figure 19 suggests that repetition varies less clearly by issue type than by concern maturity or institutional diffusion. The overall benchmark for all CMA statements in 2014-2025 is 44.6% high repetition. Some categories are close to this benchmark, including tariff measures (41.1%), QR and licensing (42.6%), and export-related measures (42.5%). Taxation (50.6%) and SPS-related concerns (48.5%) show somewhat higher repetition, while TBT (37.1%) and trade remedies (38.6%) are lower.

The differences across issue categories are less pronounced than those observed for institutional diffusion or concern maturity. Moreover, because the categories are not mutually exclusive, the observed pattern may partly reflect the characteristics of concerns that combine several types of measures, rather than the independent association of any one issue type with repetition. One possible interpretation is that certain issue types lend themselves more readily to repeated formulations because they involve stable legal arguments, recurring factual claims, or concerns that are also discussed in specialized WTO bodies. However, issue type should not be read as a causal explanation. The degree of repetition associated with a category may also reflect the maturity, salience, or institutional diffusion of the concerns in which that type of measure appears.

6.4 Synthesis

Taken together, the three exploratory analyses suggest that repetition in CMA statements is most clearly associated with the recurrence and institutional circulation of trade concerns. Mature concerns, and concerns that also appear in the CTG or other WTO bodies, show higher shares of repeated language. Issue type appears to matter less clearly, although taxation and SPS-related concerns show somewhat higher repetition than the overall benchmark.

Across the three dimensions, repetition is driven mainly by paraphrased reuse rather than near-verbatim repetition. This suggests that repeated CMA language usually reflects the reformulation of stable positions, rather than the simple reproduction of earlier wording. Repeated statements may

reflect stable positions, recurring legal or factual framing, continuity in the official record, limited change in the underlying measure, or the way interventions are summarized in official minutes.

The evidence in this section points to a clear pattern: recurring and institutionally diffused concerns tend to generate more repeated language, especially paraphrased repetition, in the official English record of CMA minutes.

7 CONCLUSIONS

This paper shows that the CMA has become an increasingly active forum for discussing market access-related frictions in goods. Based on 138 CMA trade concerns discussed between 1995 and 2025, and with particular attention to the 2014-2025 period, the paper has examined both the substance of the issues raised and the recorded form of Members' interventions. The findings show that what was once a relatively sporadic practice has become a regular and increasingly important part of the Committee's work, especially since the mid-2010s and even more visibly after 2020.

The issues raised as trade concerns in the CMA have become broader, more recurrent, and more connected across meetings and WTO bodies. The concerns discussed in the Committee now extend beyond tariffs, quantitative restrictions and other classic market-access instruments to include a wider range of non-tariff, regulatory, and administrative measures affecting trade in goods. The types of issues raised at the CMA appear to overlap with those raised in other specialized bodies, such as the SPS, TBT, and trade remedies Committees. The agenda is also increasingly shaped by recurring or "sticky" concerns that remain under discussion across successive meetings. In parallel, the recorded discussion has grown longer, reflecting not only the larger number of concerns and participating Members, but also longer average statements.

The GATT 1994 remains central to how Members frame CMA concerns, but the paper does not draw legal conclusions from those references. Articles XI, II, III, and I appear as important points of reference for Members in raising concerns in this Committee, with Article XI becoming more prominent in recent years. These references help show how Members present and structure their concerns, but the Committee does not make legal findings on consistency with WTO rules, and such findings fall outside the scope of regular committee discussion and are made, where relevant, through dispute settlement under the DSU.

Repetition in the CMA is more often a matter of reformulation of past statements than mechanical copying. The analysis shows that delegations increasingly reuse or adapt language from earlier CMA meetings. This repetition appears mainly as paraphrased language, where delegations preserve similar factual descriptions, legal references, and policy framing while adapting parts of the wording of their statements. Near-verbatim repetition is less common overall, but becomes more visible in the verbatim-style minutes period, when exact wording overlap can be detected more reliably in the official record. Some CMA language also reappears outside the Committee, especially in related CTG discussions. Although this overlap should not be treated as automatic escalation, it does show that some concerns acquire cross-body visibility.

Repetition appears to be more clearly associated with the institutional life of a concern than with the type of measure at issue. Concerns raised repeatedly over time, and concerns discussed across multiple WTO bodies, especially those also raised in the CTG, tend to show higher levels of repeated language. The type of underlying issue also appears to matter, but the relationship is weaker and more heterogeneous. In that sense, repetition seems to be connected less to the substantive category of a measure than to the maturity and institutional diffusion of the concern itself.

These findings should be understood as descriptive evidence of recorded committee practice, not as legal, political, or causal conclusions. They do not assess the legal merits, trade impact, political importance, or substantive novelty of any individual concern, nor do they establish why Members repeat or reformulate language. The analysis relies on official minutes and the TCDB, and therefore does not reconstruct informal or bilateral consultations, Members' internal strategies, oral delivery beyond the minutes, or political developments outside the formal record. The text-similarity indicators identify lexical overlap, not substantive or legal equivalence, and the limited information available on resolution and dispute settlement is indicative only.

The CMA experience illustrates how repeated dialogue can form part of WTO transparency and monitoring in practice, and how bodies can adapt their working practices to new needs. WTO regular bodies are not only venues for information exchange. They also provide a forum where concerns are discussed, recorded, preserved, updated, and sometimes followed across meetings and bodies. Repeated statements should not be read, by themselves, as evidence that committee discussion has failed. They may also reflect continuity of positions, unresolved measures, the institutionalization of a concern, or the need to preserve a formal record. Understanding this evolution matters for identifying where reforms or improvements may be needed, as well as for transparency, agenda management, institutional memory, and the broader functioning of the WTO goods architecture. Future work could apply similar methods to other WTO bodies, examine how concerns evolve as more official information on resolution becomes available, or study how Members' framings change as concerns move across institutional settings.

ANNEX 1 DATA SOURCES AND METHODOLOGY

A.1 Data sources, scope, and units of analysis

The study relies on official WTO records relating to trade concerns raised in the Committee on Market Access (CMA) and the Council for Trade in Goods (CTG) between 1995 and 2025. The main source consists of the official minutes of CMA and CTG meetings, as reflected in the Trade Concerns Database (TCDB)²³ and complemented, where relevant, by extracts from the minutes, meeting agendas, document symbols, and the authors' reconstruction of concern histories from the official record.

The analysis uses several units of observation, depending on the empirical question addressed. A **trade concern** refers to a distinct issue raised by one or more WTO Members in relation to a measure, practice, or policy of another Member or group of Members. A **concern-meeting** refers to the appearance of a given trade concern at a specific meeting. A **statement** refers to the text attributed in the official WTO minutes to a delegation under a specific trade concern at a specific meeting. This unit does not necessarily correspond to the complete oral intervention delivered in the room. Rather, it captures the official English text recorded in the minutes. Where a delegation took the floor more than once under the same trade concern in the same meeting, the statement field groups the text attributed to that delegation under that agenda item. A **statement pair** refers to two statements compared under the pairing rules described below. A **meeting** refers to a formal CMA or CTG meeting included in the dataset. A **WTO body** refers to the institutional forum in which a concern was raised in the WTO, in particular the CMA and the CTG for the purposes of this paper. A **provision** refers to a WTO legal provision identified in the official record as being invoked, referred to, or otherwise associated with a trade concern.

Each statement-level observation contains at least five data elements that were captured: the concern identifier assigned in the TCDB, the meeting date, the document symbol of the minutes, the delegation name, and the text attributed in the minutes to that delegation under the relevant trade concern. Separate fields were retained for raw and normalized statement text, and for original and delegation names.

The analysis is based on the **English version of the text** recorded in WTO minutes. In some cases, statements may have originally been delivered in French or Spanish and later reflected in English in the official record. The paper, therefore, analyses textual similarity in the official English record, not similarity in the original oral delivery, any prior written speaking note, or any informal exchange outside the minutes.

Trade concerns are classified as **newly raised** or **previously raised** using the meeting agenda, TCDB information where available, and the authors' reconstruction of concern histories from the official records. A concern is treated as newly raised at the first meeting in which it appears in the reconstructed CMA concern history. Subsequent appearances of the same concern are treated as previously raised.

A separate many-to-many mapping was established to link CMA concerns to potentially corresponding CTG concerns. The mapping is based on the information available in the TCDB as of 30 April 2026 and the authors' reconstruction of concern relationships from the official record. This mapping was applied before any cross-body pairing so that CMA statements were compared only with CTG statements under mapped concerns, rather than across the entire CTG record.

A.2 Member name normalization

Delegation names may vary across the official minutes. Examples include shortened references, changes in official nomenclature, spelling variants, and formatting differences, e.g., "United States" vs "United States of America", "European Union" vs "EU", "Turkey" vs "Türkiye". To improve comparability over time, delegation names were harmonized to a standardized form while preserving

²³ See WTO [Trade Concerns Database](#) (TCDB).

the original wording in a separate field. The harmonized delegation name is used for statement pairing and aggregation.

For the purposes of delegation harmonization, concerns relating to the European Union or any of its member States were treated as relating to the European Union as a single entity. This reflects the fact that statements on behalf of the European Union and its member States are delivered through the European Commission in the WTO bodies covered by this study.

Joint statements, group statements, and statements made on behalf of other Members were treated according to a general attribution rule. Where the official minutes attribute a statement to a delegation acting on behalf of an identified group, the statement is assigned to the harmonized group or representative category used in the dataset. Where the minutes attribute statements separately to individual Members, those statements are treated as separate Member statements. Where the statement is recorded as a joint or group statement and cannot be reliably decomposed into separate individual statements, it is treated as a group or joint-statement observation rather than being duplicated across all participating Members.

A specific consolidation rule was applied for statements attributed to Gulf Countries. Where the official records refer to statements made by or on behalf of Gulf Countries as a group, including statements delivered by Kuwait, Oman, Bahrain, Qatar, Saudi Arabia, or the United Arab Emirates in that representative capacity, those statements were consolidated under the harmonized delegation category "Gulf Countries". This rule reflects the recorded representative capacity of the statement and avoids artificial non-matches when the delegation speaking on behalf of the group rotates across meetings. All manual corrections and harmonization decisions were recorded in separate files.

A.3 Text normalization

Text normalization was applied to reduce superficial formatting differences that could otherwise affect text comparison and length measurement. The purpose of normalization was not to rewrite statements, alter their substantive meaning, or improve their style, but to create a consistent computational text field for reproducible comparison.

For each statement, the raw text and normalized text were stored separately. The raw field preserves the text extracted from the official records, subject only to storage and data-entry requirements. The normalized field is used for similarity and length calculations.

Normalization was applied through deterministic scripts. The scripts converted text to a consistent Unicode form, decoded common HTML entities, replaced typographic quotation marks and dash variants with plain-text equivalents, removed selected list markers and formatting artifacts, converted non-standard spaces to ordinary spaces, collapsed repeated whitespace, standardized selected punctuation spacing, standardized percent references, and converted text to lowercase for tokenization. The scripts also removed technical artifacts such as bullet symbols, literal "x000D" strings, tab characters, repeated separator characters, and other formatting artifacts identified during data cleaning.

The normalization rules did not remove introductory phrases such as "The representative of..." or "The delegation of...". The scripts did not stem or lemmatize words, remove stopwords, translate text, or perform semantic rewriting. All similarity and length calculations were performed on the normalized text fields by deterministic scripts.

As previously mentioned, the analysis is conducted on the official English text recorded in the minutes. Where statements were originally delivered in French or Spanish and later reflected in English, textual similarity may be affected by translation choices. This may reduce or alter measured overlap where the underlying position is similar, but the English wording differs, or conversely increase apparent similarity where standardized translation choices are repeated across meetings. Therefore, the results should be interpreted as similarity in the official English record, not necessarily as similarity in the original oral delivery.

A.4 Pairing logic for matching the statements

The analysis uses three pairing exercises: (i) repetition within the CMA over time, (ii) overlap from the CMA to the CTG, and (iii) overlap from the CTG back to the CMA. In each case, pairings are generated mechanically from the concern IDs, harmonized delegation names, body, meeting chronology, and the relevant look-back or look-ahead rule.

A.4.1 CMA-to-CMA repetition

For each CMA trade concern and harmonized delegation, statements were ordered chronologically. Each statement at meeting N was compared with the same delegation's previous statement under the same CMA concern using a three-meeting look-back window: first N-1, then N-2, and finally N-3. Where an eligible prior statement was identified, the current statement was paired with that prior statement and the similarity scores were calculated on the normalized text fields.

The **three-meeting window** was chosen to balance comparability and proximity in time. Since the CMA normally holds two formal meetings per year, a three-meeting look-back generally captures statements made within roughly the previous 12 to 18 months. Extending the window further would have allowed comparisons with older statements after longer periods without recorded discussion. Such comparisons may be less informative for measuring repetition in an ongoing recorded discussion and could introduce noise by forcing pairings between statements separated by a substantial gap in Committee activity. Thus, the N-3 rule provides a consistent and auditable limit for identifying eligible prior statements while avoiding comparisons with statements that are too remote in time.

Where no prior statement by the same harmonized delegation under the same CMA concern was identified within the previous three CMA meetings, the statement was classified as "No comparable prior statement". This is a pairability category and means that the methodology did not identify an eligible prior statement for comparison under the three-meeting look-back rule. It is not a measure of textual freshness and is not always equivalent to the trade concern being raised for the first time. Thus, the labels "near-verbatim", "paraphrased", and "fresh text" are assigned only to statement pairs with an eligible comparator. "No comparable prior statement" is reported separately.

In the CMA repetition-analysis dataset, 706 of the 1,975 CMA statement rows fall into the "No comparable prior statement" category. Of these 706 rows, 568, or 80.5%, correspond to the first meeting of the trade concern; 106, or 15.0%, relate to existing trade concerns on which the delegation had no earlier statement; and 32, or 4.5%, are cases where the same delegation had spoken before, but not within the three-meeting look-back window. In other words, 95.5% of the rows in this category correspond to cases where the delegation was speaking under that trade concern for the first time in the dataset, while only 4.5% were unpaired because an earlier same-delegation statement fell outside the three-meeting window.

A.4.2 CMA-to-CTG overlap

For each CMA statement, the pre-established CMA-CTG mapping was used to identify the corresponding CTG concern or concerns following a similar pairing logic. For the same harmonized delegation, the CMA statement was then compared with the earliest eligible CTG statement under the mapped concern or concerns using a three-meeting look-ahead window: first the next CTG meeting (N+1), then the second CTG meeting (N+2), and finally the third CTG meeting (N+3). Eligibility required that the CTG statement concern a mapped CTG identifier and be made by the same harmonized delegation.

Where no eligible CTG statement was found within that window, no substantive cross-body comparator was identified under the pairing rule. This preserves the full statement-level time series while capturing whether, and how quickly, CMA interventions were followed by eligible CTG interventions under mapped concerns.

A.4.3 CTG-to-CMA overlap

For each CTG statement, the pre-established CMA-CTG mapping was used to identify the corresponding CMA concern or concerns. For the same harmonized delegation, the CTG statement

was then compared with the nearest eligible prior CMA statement under the mapped concern or concerns using a three-meeting look-back window: first the previous CMA meeting (N-1), then the second previous CMA meeting (N-2), and finally the third previous CMA meeting (N-3). Eligibility required that the CMA statement concern a mapped CMA identifier and be made by the same harmonized delegation, including the agreed "Gulf Countries" rule.

Where no eligible prior CMA statement was found within that window, no substantive prior CMA comparator was identified under the pairing rule. This preserves the full statement-level time series while capturing whether, and how recently, CTG interventions had been preceded by similar interventions in the CMA.

A.5 Similarity metrics and labels

The repetition analysis uses two complementary measures of textual similarity: Jaccard n-gram similarity and TF-IDF cosine similarity. Both measures were calculated mechanically from the normalized statement fields.

A.5.1 Jaccard n-gram similarity

Jaccard similarity is a standard measure for comparing the overlap between two sets and is widely used in near-duplicate text detection. Its use with word shingles follows the resemblance approach associated with Broder (1997)²⁴ and later information-retrieval applications, including Leskovec, Rajaraman, and Ullman (2014).²⁵ In this paper, the relevant sets are composed of contiguous word sequences, or "n-grams". A 5-gram is a sequence of five consecutive words. A 7-gram is a sequence of seven consecutive words. For each statement, the scripts generated all overlapping 5-word sequences and, separately, all overlapping 7-word sequences. For each pair of statements, the Jaccard score is calculated as the number of shared n-grams divided by the total number of distinct n-grams appearing in either statement. The score is reported on a 0-100 scale.

The 5-gram measure captures overlap in relatively short repeated phrases. The 7-gram measure is stricter because two statements must share longer identical word sequences to obtain a high score. High Jaccard scores therefore indicate repeated or near-repeated wording, not merely similarity in topic. For example, consider the following two statements:

Statement A: "Members remain concerned about the import licensing measure."

Statement B: "Members remain concerned about the import licensing requirement."

Using 5-grams, Statement A contains the following four sequences: "Members remain concerned about the"; "remain concerned about the import"; "concerned about the import licensing"; and "about the import licensing measure". Statement B contains the first three of these same sequences, but ends with "about the import licensing requirement". The two statements therefore share three 5-grams. Across both statements, there are five distinct 5-grams. The Jaccard 5-gram score is therefore $3/5$, or 60.0.

This example also shows why Jaccard n-gram similarity is demanding. A small wording change at the end of the sentence reduces the number of identical sequences. Longer 7-grams are even more sensitive to such changes.

A.5.2 TF-IDF cosine similarity

TF-IDF cosine similarity is a standard vector-space approach used in information retrieval to compare documents on the basis of weighted lexical overlap. The approach follows the term-weighting and

²⁴ Andrei Z. Broder, "On the Resemblance and Containment of Documents", *Compression and Complexity of Sequences* 1997, pp. 21-29, DOI 10.1109/SEQUEN.1997.666900.

²⁵ Leskovec, J., Rajaraman, A., & Ullman, J. D. (2014). *Mining of Massive Datasets* (1st ed.), p. 56. Cambridge University Press, second edition, Retrieved from: <https://book.huihoo.com/mining-of-massive-datasets/mmds/booka.pdf>

vector-space tradition associated with Salton and Buckley (1988)²⁶, and the information-retrieval treatment in Manning, Raghavan, and Schütze (2008).²⁷ Each statement is represented as a vector of weighted terms. Term frequency reflects how often a term appears in a statement. Inverse document frequency gives less weight to terms that are common across the comparison set and more weight to terms that are relatively distinctive. Cosine similarity then measures how closely the two weighted term vectors point in the same direction. The score is reported on a 0-100 scale.

Unlike Jaccard n-gram similarity, TF-IDF cosine similarity does not require the same words to appear in the same consecutive order. Two statements may receive a relatively high TF-IDF cosine score if they use similar distinctive vocabulary, even where the exact phrasing differs. For example, consider the following two artificial statements:

Statement A: "The delegation remains concerned that the import licensing measure restricts trade in steel products."

Statement B: "The delegation continues to express concern about licensing requirements affecting imports of steel products."

These two statements share several important terms, including "delegation", "concern", "import" or "imports", "licensing", and "steel products". Their exact 5-word or 7-word overlap would be limited because the words appear in different sequences. TF-IDF cosine similarity may nevertheless be higher than Jaccard similarity because the weighted vocabulary points to similar subject matter. This is why TF-IDF cosine is useful as a complement to Jaccard n-gram similarity.

At the same time, TF-IDF cosine similarity is not a semantic measure. It does not establish that two statements have the same legal meaning, negotiating purpose, or substantive implication. It captures weighted lexical similarity in the recorded English text.

In the baseline implementation, TF-IDF cosine similarity was computed using unigrams and fitted separately for each statement pair. This pairwise specification compares the two statements directly, but means that inverse-document-frequency weights are defined within each pair rather than across the full statement corpus. Because of this, TF-IDF scores should be interpreted as pair-specific lexical-similarity indicators rather than corpus-standardized similarity scores.

A.5.3 Repetition labels used for the analysis

The repetition labels "near-verbatim", "paraphrased", and "fresh text" are operational textual-similarity categories derived mechanically from numerical thresholds applied to statement pairs for which an eligible comparator exists. They are not manual judgments about the intent, legal meaning, or substantive equivalence of statements. The category "No comparable prior statement" is reported separately as a pairability category and is not itself a textual-similarity label.

For presentation purposes, the labels are described through a sequential rule. The first step identifies **near-verbatim** repetition using Jaccard 5-gram similarity. If the Jaccard 5-gram score is at or above the specified threshold, the pair is classified as near-verbatim, because the two statements share substantial exact phrase overlap. Among the remaining pairs, the second step uses TF-IDF cosine similarity to identify cases of high weighted lexical similarity without extensive identical phrase overlap. If the TF-IDF cosine score is at or above the specified threshold, the pair is classified as **paraphrased**. Pairs that meet neither condition are classified as **fresh text**. Because the style used to prepare the minutes changed over time, the distribution of repetition labels may differ between reported-style and verbatim-style minutes.

The classification is presented sequentially for clarity. During the development of the methodology, the authors also considered a fourth theoretical combination: high Jaccard 5-gram similarity but low TF-IDF cosine similarity. This category, initially considered as a possible way to identify "diplomatic boilerplate", produced no observations in the baseline results and did not affect the 75-point

²⁶ Gerard Salton and Christopher Buckley, "Term-weighting approaches in automatic text retrieval", *Information Processing & Management* 24(5) (1988), 513-523, DOI 10.1016/0306-4573(88)90021-0

²⁷ Manning, C. D., Raghavan, P., & Schütze, H. (2008). *Introduction to Information Retrieval*, p. 121. Cambridge University Press. Retrieved from: <https://nlp.stanford.edu/IR-book/pdf/irbookonlinereading.pdf>

robustness specification. Presenting the classification sequentially therefore does not change the reported labels, counts, or similarity scores; it only simplifies the interpretation of the classification rule.²⁸

The baseline classification uses a 50-point threshold, with a stricter 75-point threshold used as a robustness check. The following classification tables apply only to statement pairs for which an eligible comparator was identified; "No comparable prior statement" is reported separately as a pairability category.

Step	Numerical condition	Operational label
1	Jaccard 5-gram ≥ 50	Near-verbatim
2	Jaccard 5-gram < 50 and TF-IDF cosine ≥ 50	Paraphrased
3	Jaccard 5-gram < 50 and TF-IDF cosine < 50	Fresh text

Under the stricter robustness specification, the same sequential logic is applied using a 75-point threshold:

Step	Numerical condition	Operational label
1	Jaccard 5-gram ≥ 75	Near-verbatim
2	Jaccard 5-gram < 75 and TF-IDF cosine ≥ 75	Paraphrased
3	Jaccard 5-gram < 75 and TF-IDF cosine < 75	Fresh text

The stricter 75-point specification yielded similar patterns to the baseline 50-point specification, although, as expected, fewer pairs met the higher similarity threshold.

For both tables, the category "**No comparable prior statement**" is not a textual-similarity label. It is assigned where no eligible comparator exists under the applicable pairing rule. In the CMA-to-CMA repetition analysis, it means that no prior statement by the same harmonized delegation under the same CMA concern was identified within the previous three CMA meetings.

A.6 Identification of WTO provisions cited

References to WTO Agreements and provisions were identified from the official minutes and coded separately at the level of the trade concern, allowing the analysis to distinguish between agreement-level and provision-level references. For example, a concern could be recorded as referring to the GATT 1994 at the agreement level and, where the record identified or clearly invoked specific obligations, also to individual provisions such as Article I, Article II, Article III, or Article XI of the GATT 1994.

A provision was counted where it was expressly invoked or cited in the recorded discussion. In addition, implicit references were coded where the recorded wording clearly invoked a legal concept associated with a specific WTO provision, for example where a general reference to the "MFN principle" was coded as a reference to Article I of the GATT 1994. Where a concern referred to more than one agreement or provision, each agreement or provision was recorded once for that concern.

The initial coding was undertaken manually. The results were then checked against an AI-assisted extraction that separately flagged express references and possible implicit references. Differences

²⁸ The authors would like to thank Christian Steidl for pointing this out during his review of the paper.

between the manual coding and the AI-assisted extraction were reviewed manually to reduce false positives and to ensure that ambiguous references were interpreted in context. The coding of provisions is descriptive and without prejudice to the legal relevance of any WTO provision or to Members' rights and obligations.

A.7 Measuring the length of statements

In this analysis, the length of the statements was measured on the basis of the normalized text used for the similarity calculations. Two length indicators were retained.

Count of characters: For each normalized statement, we calculated the number of characters in the full normalized text, including spaces and punctuation as they appeared after normalization. This measure provides a simple gauge of text volume.

Count of words: Word counts were calculated by splitting the normalized text on whitespace and counting the resulting tokens. This measure is less sensitive than character counts to line breaks and formatting differences and is more intuitive for readers.

All length measures were computed on the normalized text field, while the raw text field was retained separately for auditability. We summarized them per statement and, where relevant, as meeting-level aggregates using averages, medians, minima, and maxima.

A.8 Robustness and sensitivity

To assess whether the main findings depend on particular methodological choices, the analysis included several robustness and sensitivity checks.

First, the thresholds used to translate similarity scores into operational repetition labels were varied. The baseline classification uses a 50-point threshold, while a stricter 75-point threshold was used as a robustness specification. The same sequential classification logic was applied under both thresholds.

Second, in the CMA-to-CTG overlap exercise, alternative calendar-based look-ahead windows were tested, including 180, 365, and 730 days. These checks assess how sensitive the overlap rate and similarity classifications are to the choice of pairing window.

Third, because WTO bodies meet at irregular intervals, the final CMA-to-CTG specification uses a meeting-based prioritized look-ahead rule (+1, +2, +3 CTG meetings) rather than a fixed calendar-day window. This specification better reflects the institutional rhythm of WTO regular-body meetings.

Finally, because the baseline TF-IDF cosine similarity was fitted pairwise, this specification is reported transparently as a methodological limitation. A corpus-level TF-IDF specification would be a useful robustness check in future extensions of the analysis.

Together, these checks assessed whether the main substantive patterns remain stable under stricter similarity thresholds and alternative pairing windows. The pairwise TF-IDF specification should be kept in mind when interpreting TF-IDF cosine scores.

A.9 Reproducibility and the role of artificial intelligence tools

All calculations reported in this paper were generated by deterministic scripts applied to archived input files using fixed parameter settings. These scripts produced the normalized text fields, harmonized delegation fields, paired statement files, similarity scores, repetition labels, length indicators, and the output files used to prepare the summary tables and figures reported in the analysis.

ChatGPT was used as a research assistant during the preparation of the paper. Its role included support for code drafting, debugging, methodological documentation, consistency checks, and the identification of potential edge cases for author review. ChatGPT was not used as the analytical engine for the reported empirical results, and it did not assign repetition labels through subjective

judgment. The classifications reported in the paper were generated mechanically by scripts applying predefined thresholds to normalized statement text.

The prompts used during the research process form part of the workflow documentation. They are not the mechanism by which the results are reproduced. The reproducible objects are the archived input files, scripts, parameter settings, output files, software or package information, correction logs, and documented coding rules.

The authors retained replication materials, including final scripts, package or environment information, input files, output files, parameter settings, manual correction and harmonization logs, and relevant prompts as workflow documentation. These materials allow the reported tables and figures to be regenerated from the archived inputs and are available from the authors upon request, subject to applicable WTO document-access and data-sharing rules.

A.10 Limitations

The paper analyses the formal recorded layer of trade concern discussions in the relevant WTO bodies. It does not capture informal consultations, bilateral exchanges, capital-level contacts, political developments outside the minutes, or the full negotiation history surrounding each concern. Because the unit of analysis is the text attributed to a delegation in the minutes, the dataset may also not capture the full oral statement delivered in the meeting. In addition, statements originally delivered in another WTO language and later reflected in English are analysed in their official English recorded form. The findings should therefore be interpreted as evidence of textual patterns in the official English record, not as a complete account of the diplomatic or political process behind each concern.

Finally, textual similarity does not necessarily imply substantive equivalence, legal equivalence, strategic coordination, or causal diffusion. Similar wording may reflect repeated legal claims, standard diplomatic phrasing, stable national positions, institutional reporting practices, or limited changes in the underlying measure. The methods identify observable textual patterns and should be interpreted within those limits.

ANNEX 2 LIST OF FIGURES

Figure 1. CMA: Number of trade concerns, by meeting (1995-2025)

Figure 2. CMA: Evolution in the number of statements on trade concerns delivered by WTO Members in each meeting, by type of participation (2014-2025)

Figure 3. CMA: Number of trade concerns and overlap with CTG and other WTO body discussions, by meeting (2014-2025)

Figure 4. CMA: Evolution in the types of measures raised as trade concerns (2014-2025)

Figure 5. CMA: Distribution of measure types raised as trade concerns (2014-2019 vs 2020-2025)

Figure 6. CMA: CMA: Number of trade concerns with reference to WTO Agreements mentioned in trade concern discussions (1995-2025)

Figure 7. CMA: Main GATT provisions mentioned or associated with trade concern discussions (1995-2025)

Figure 8. CMA: Evolution in the main GATT provisions mentioned or associated with trade concern discussions (2014-2025)

Figure 9. CMA statements on trade concerns: Total number of words reflected in the minutes, by meeting date (2014-2025)

Figure 10. CMA statements on trade concerns: Average, minimum, and maximum number of words, by meeting date (2014-2025)

Figure 11. CMA statements on trade concerns: Average number of words per statement, newly raised and previously raised concerns, by meeting date (2014-2025)

Figure 12. CMA statements on trade concerns: Degree of repetition, measured by average Jaccard 5-gram similarity, by meeting (2014-2025)

Figure 13. CMA statements on trade concerns: Degree of repetition, measured by average TF-IDF cosine similarity, by meeting (2014-2025)

Figure 14. CMA statements on trade concerns: Statement-level composition by repetition outcome and meeting (2014-2025)

Figure 15. CTG statements on trade concerns: Share with and without a prior CMA match, by meeting (2014-2025)

Figure 16. CMA statements on trade concerns linked to the CTG: Number of statements by meeting and subsequent CTG follow-up outcome (2014-2025)

Figure 17. Statement-level composition of CMA statement outcomes by institutional diffusion (2014-2025)

Figure 18. Statement-level composition of CMA repetition outcomes by concern maturity (2014-2025)

Figure 19. Statement-level composition of CMA statement outcomes by selected issue category (2014-2025)