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ABOUT US

WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal provided dedicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

REGULATING THE RENEWABLE ENERGY **STANDARDS: THE DYNAMICS OF INTERNATIONAL** **TRADE AND WTO COMPLIANCE**

AUTHORED BY - SHORONYA BANERJEE & DR CHRISTABELL JOSEPH

Christ (Deemed to be University)

Abstract

Climate change and energy security have led countries worldwide to develop a legal framework for handling and accessing trade in renewable and renewable energy sources. The WTO has acknowledged the threat of environmental hazards, although the facet of free trade is its backbone. This is where the WTO faces the dilemma of justifying support measures for the renewable energy sector that work against the rules of international trade law. The OPEC uses strategies to control oil prices, which goes against international trade rules. However, the WTO has not challenged this. Support measures are crucial in deploying renewable energy technologies. However, time and again, the legal challenges cropping up in the multilateral trading system have become the most significant impediment in this process. The regulation of energy subsidies and the role played in the multilateral trading system require attention. This paper explores and emphasises the ever-subsistent discussion of renewable energy dispute backed by WTO law. This paper has tried to shed light on the complaints about energy subsidies and initiated consultations by the WTO members in the energy sector. A surprising factor is that most such disputes are pending in this consultation stage. It is significant to identify the main barriers to the augmentation of renewables related to the infrastructural costs that make energy production collegial compared to energy production. The subsidisation of conventional energy sources crops up at this stage. Therefore, this paper has taken a turn to discuss renewable energy subsidies in the multilateral trading system and focus on the nature and focal points of such disputes. The paper has further spoken of renewable energy Local Content Requirements (LCRs) and how they fit into the support measures framework. The Agreement on Subsidies and Countervailing Measures (SCM Agreement) threatening subsidising renewables has also been analysed. The author has abided by the doctrinal research method and utilised primary and secondary resources in journals, articles, etc, to write this paper.

Keywords

Renewable energy, trade, WTO, The Agreement on Subsidies and Countervailing Measures, Local Content Requirements, WTO disputes and fossil fuels.

Introduction

Tackling the climate crisis is at the top of the global agenda list, the problem of this hour! Therefore, shifting our utilisation from fossil fuels to sustainable renewable energy is necessary, continuously replenishing in a human lifetime. This sustainable energy produces either no or negligent greenhouse gas emissions. Dating back, determining the ultimate authority of control over international energy trade took a lot of work. The dilemma hovered over either GATT or WTO. Trade in hydrocarbons, nuclear materials, and cross-border electricity transmission transpired away from the multilateral trading system. The General Agreement on Trade in Services (GATS) only covered limited categories of energy services, lacking comprehensive sector-specific provisions. While a few isolated issues related to energy goods did reach the dispute settlement stages of the GATT and WTO, this was not unconventional.¹

Despite the stratified energy sector being compared to typical goods and services trade, the convergence of the international energy industry and the rules established within the WTO framework must be addressed. First, major oil-producing countries like Saudi Arabia have joined the WTO, with others like Libya and Algeria awaiting accession. This extension of membership was bound to change the WTO paradigm. Climate change and the efforts to reduce greenhouse gas emissions through the United Nations Framework Convention on Climate Change (UNFCCC)² and national measures fall within the ambit of WTO rules. This was discussed in the COP meeting in Copenhagen in 2009. Recognising these global changes and the affiliation of energy, trade regulations, and climate change, the World Energy Council (WEC) began addressing these issues in recent years.³

¹ Scott Miller. (2018) *Energy Trade and GATT RULES*, Hinrich Foundation. Available at: <https://www.hinrichfoundation.com/research/tradevistas/wto/energy-trade/> (Accessed: 23 October 2023).

² D. Bodansky, 1993. The United Nations framework convention on climate change: a commentary. *Yale J. Int'l L.*, 18, p.451.

³ Richards, T.J. and Herman, L. *Relationship between International Trade and Energy*, World Trade Organization. Available at: https://www.wto.org/english/res_e/publications_e/wtr10_richards_herman_e.htm (Accessed: 23 October 2023).

The WTO Agreements don't trace the boundary for defining 'energy.' The International Energy Agency (IEA) defines renewable energy as "energy derived from natural processes that are replenished constantly. In its various forms, it derives directly or indirectly from the sun or heat generated deep within the earth." Several hurdles stand in the way of conducting trade in renewable energy, especially with the existent legislative loopholes that fail to address all probable issues associated with trade in renewable energy. This paper mainly discusses building on this diffusion of renewable energy trade and finding further remedies.

Fundamental Issues in International Energy Trade and Renewable Energy Regulation

Energy trade is crucial to public international law, considering oil, gas and atomic energy extraction. The global legal framework ranges from the WTO to the European Energy Charter. In the 1950s, the rights of coastal states allowed the continental shelf regime to operate off-shore exploitation of oil and gas reserves. The Energy Charter and WTO law regulate trade and investment in energy materials and equipment. The International Energy Agency (IEA) of The Organisation for Economic Co-operation and Development (OECD) is the forum of inter-governmental research and development on net energy-importing countries. International energy regulation does not offer a single regime to address the issue of exploration and trade in energy. This paper addresses legal issues and gaps related to regulating renewable energy standards and their compliance with World Trade Organization (WTO) rules. It delves into the legal challenges faced by support measures taken recourse with by countries to promote renewable energy sources. These measures may include subsidies, feed-in tariffs, tax incentives, and local content requirements. It examines the WTO's dispute settlement mechanism, especially concerning disputes related to renewable energy support measures. The paper assesses how the WTO dispute settlement process is applied in these cases and whether it effectively addresses the specific issues raised by such disputes. It is essential to question whether governments can substantiate their support for renewable energy sources according to their environmental and social benefits. One key issue stands on exploring whether WTO rules can contain such justifications and whether there is room for governments to argue in favour of renewable energy subsidies on these grounds. The paper takes a step towards assessing the legal grounds on which challenges to renewable energy support measures are based. In contrast, it also includes examining the provisions of the General Agreement on Tariffs and Trade (GATT) and the Agreement on Subsidies and Countervailing Measures (SCM Agreement) invoked in these disputes. LCRs may require a certain percentage of the components used in renewable energy projects to be sourced locally. The paper

explores the legal validity of LCRs and compliance with WTO rules.⁴

Trade Conflicts and Industrial Policy

Globally, governments have recognised the need to prioritise the development of renewable energy technologies by formulating specific policies and incentives. The disclosure of industrialising economies has developed a global supply chain, increasing trade in renewable energy technology across international borders. This has become a catalyst for initiating trade-related disputes. The functionality of most renewable energy technologies requires a governmental mandate. Direct government-supported subsidies could go against international trade rules, and programs that target to nurture and promote the growth of the domestic manufacturing industry are at utmost risk. Political support for renewable energy technologies can be derived only after promising more jobs and development of domestic technology, which intervenes with international trade flows bearing the possibility of conflict creation against multiple WTO provisions and trade laws.⁵

The political economy of domestic renewable energy and the principles of global trade regimes directly affect nations' adapting abilities to form low-carbon economies. The progressive era of renewable energy-associated trade disputes goes back to highlighting the already received warnings of the environment in consideration of the global competition sector. Renewable energy boosts economic development, but socially profitable and preferable technologies are usually perceived as unprofitable. This is why policy-backed tools are needed to regulate relative prices and support the adoption of alternative energy technologies through subsidies. Renewable energy's carbon alleviation reliefs extend globally, while its utilisation also produces economic development impacts.⁶

Countries promote protectionist policies since they persuade domestic manufacturing for renewable energy and forbid foreign entry into domestic markets. Several countries are incompetent to become competitive exporters of green technologies, but if industrial policies can create competitive domestic manufacturers, domestic economic benefits may arise. New market entrants refer to increased competition in the sector, which stimulates technological innovation. The "most favoured nation" principle eliminates discrimination against specific trading partners. Further, the "national treatment" principle promotes equal and fair treatment of imported and domestically produced goods in the

⁴ F. Biermann, and R. Brohm, 2005. Border adjustments on energy taxes: a possible tool for European policymakers in implementing the Kyoto Protocol? *Vierteljahrshefte zur Wirtschaftsforschung*, (2), pp.249-258. (Accessed on 24. 03. 2024)

⁵ J.I Lewis, 2014. The rise of renewable energy protectionism: emerging trade conflicts and implications for low carbon development. *Global Environmental Politics*, 14(4), pp.10-35. (Accessed on 24. 03. 2024)

⁶ *Ibid*

marketplace. Additional principles, like those of dumping and subsidy regulations, aim to establish a level playing field as goods are traded across borders⁷. These principles are construed into distinct provisions and agreements that can dispute national-level industrial policy support. Along with the WTO Agreement on Subsidies and Countervailing Measures (SCM), other WTO provisions are essential for the support of industrial policy for renewable energy.

Technology transfer obligations are restricted by the Trade-Related Investment Measures (TRIMs). IPR enforcement is addressed by the Trade Related Intellectual Property (TRIPS) agreement, which impacts and alters market access laws and industrial policies. Article XX of the GATT deals with using specific subsidies or industrial policies to promote renewable energy technology manufacturing. Member nations may be required to demonstrate a complex link between health and renewable energy technology and the necessity of these measures to phase out fossil fuels and avert climate change. Subsidies and industrial and governmental practices directly violate international trade law.

- **Antidumping, Countervailing Duty Disputes and Local Content Disputes**

In November 2011, in retaliation to the US dispute, China earmarked sub-national renewable energy support programs in US states using LCRs. Further, the Chinese Ministry of Commerce (MOFCOM) launched an Anti-Dumping and Countervailing Duty investigation in 2012 into polysilicon from the US and South Korea, including the European Union. Another case arose, including the EU, aiming at the Chinese solar industry. In 2012, the EU company ProSun filed a petition with the European Commission on behalf of EU solar producers against China, followed by the European Commission endorsing an Anti-Dumping investigation on imports of crystalline silicon photovoltaic modules in China. An anti-subsidies probe was initiated regarding imported Chinese solar glass. Negotiations between Chinese and European politicians failed to prevent the European Commission from taking a step towards inflicting provisional antidumping duties in 2013. The EU had postponed the levying of full tariffs until August due to imposing an 11.8%. Subsequently, China launched a trade investigation against European wine exports. But in July 2013, a price undertaking was worked out between the EU and Chinese governments where an import quota of 7 GW per year applicable on Chinese-made solar panels and a minimum import price of A0.56 per watt was worked out. Companies not agreeing to participate in the undertaking were subject to the original 46.7% duty, while those participating were exempted.

Japan's bilateral consultations against Canada over Ontario's feed-in tariff (FIT) programs revolved

⁷ *Id.*

around wind and solar energy. The FIT program was blamed for its discriminatory nature against foreign renewable energy products, including its local content provision. It violated the national treatment under the General Agreement on Tariffs and Trade (GATT), alongside being contrary to the TRIMs Agreement. However, per Canada's argument, the feed-in tariff was a form of government procurement structured to ensure the inexpensive propagation of clean energy in Ontario, not as per WTO agreements. The US and the EU became parties to the consultations in September 2010. Japan had requested the formation of a dispute settlement panel backed by the WTO. This program was challenged in August 2011 by the EU, following which another panel was convened, initiating the two panels to investigate their findings. The final reports were produced after more than six months, and the panels endorsed Japan (and the EU)'s claims, which consisted of the GATT and TRIMs violations. Canada appealed the decisions after releasing the Appellate Body (AB) reports for the two disputes. According to Ontario's FIT program, it was inconsistent with Canada's international trade obligations, and the LCR's preferential treatment of Ontario-made products breached the national treatment obligation in the TRIMs Agreement and Article III of the GATT. Canada had to ensure its programs were compliant.⁸

Renewable Energy and the WTO Law of Subsidies

The Agreement on Subsidies and Countervailing Measures (SCM Agreement) addresses the issue of an increase in subsidy-associated trade disputes. This agreement establishes rules and guidelines to handle this and contour trade globally. As seen in the US – Export Restraints dispute, it was determined that it's not feasible and practical to declare a form of government intervention as a subsidy within the framework of the SCM Agreement. The SCM Agreement operates to ascertain whether a 'subsidy' is compatible and can be considered within Article 1 of the SCM Agreement. This can only go ahead if three conditions can be fulfilled:

1. Financial contribution from a government, public body, or a private entity acting on government instructions.
2. It must confer a benefit.
3. It must be specific to certain businesses or enterprises.

Regarding compatibility, the SCM Agreement prohibits two types of subsidies:

⁸ Lewis, J.I. (2014) *The rise of renewable energy protectionism: Emerging trade conflicts and implications for low carbon development*, MIT Press. Available at: <https://direct.mit.edu/glep/article/14/4/10/14803/The-Rise-of-Renewable-Energy-Protectionism> (Accessed: 16 October 2023).

- export subsidies and
- import-substitution subsidies.

All other specific subsidies are considered incompatible with the SCM Agreement and their adverse effects on the interests of other WTO members. This typically involves proving 'material injury' to import-competing industries or such animosity to export-competing interests.

Remedies under the SCM Agreement are different from that of GATT. Article 3(i)(b), the SCM Agreement prohibits contingent subsidies upon using domestic over imported products. The issue of high subsidisation employing feed-in tariffs rather than the rates offered for conventional energy is an engaging problem. The electricity sector is complex, and market competitors are awaiting the challenges. Governments essentially define the proper energy mix using appropriate rates and incentives. Considering the evidence offered by the Parties in Canada - FIT, most of the panel concluded that the criterion of benefit computing to industry had not been demonstrated. The Appellate Body questioned whether conventional and renewable energy pertain to the same relevant market. Therefore, the basis for comparative analysis and benefit determination does not exist.

The models of feed-in tariffs are likely to give way to models of differential energy taxation on process and production methods (PPMs). Renewable energy will be taxed lower than fossil and nuclear-based energy. This raises new questions of like products and compatibility with Article 111:2 and Article XX GATT. Similar issues may arise in the context of services. Depending on the modalities, differential taxation is an option which can be defended under GATT Art. XX(g) in light of the importance of climate change mitigation. The challenge here is to use appropriate tools to document the energy source through labels or tradable certificates of origin (COs) upon which taxation will be evaluated. This compares and associates subsidisation with feed-in tariffs. The tax reductions are calculated under the SCM Agreement. The Canada - FIT case shows the way to compare the return on investment and the capital in renewable energies.

A Climate Change Mitigation Policy Tool: Government Procurement

The international trade regime has identified the importance of considering non-economic objectives, sustainable development and environmental protection. This is visible in the WTO's Marrakesh Agreement, where environmental preservation is the central goal. The WTO's Marrakesh Agreement incorporated certain environmental exceptions in the Uruguay Rounds and established the Committee on Trade and Environment (CTE) to establish a harmonious trade and environment dynamic. Notably,

disputes like the US–Shrimp and Brazil–Retreaded Tyres have tested the limits of this environmental policy. However, these disputes did not involve subsidies and the Subsidies and Countervailing Measures (SCM) Agreement.

The termination of the environmental subsidy exception within the SCM Agreement (Article 8) in 1999 didn't contribute much to the trade and environment discourse until 2010. But, over the past decade, conflicts have propelled renewable energy support policies from relative oblivion to the forefront of the trade and environment discussion. Contemporary research in trade and environment now views the control of energy subsidies as a crucial area for examining how international trade and climate change regulations can complement each other.

After the SCM Agreement's single environmental exception expired in 1999, the SCM Agreement faced increased scrutiny. The government support measures are explained under and categorised under the SCM Agreement via Article 1's definition and Article 2's specificity test, further laying down three groups of prohibited, actionable, and non-actionable subsidies. Subsidies linked to export performance (export subsidies) or the predisposition for domestic over imported goods (import substitution subsidies) are prohibited. These subsidies have trade-distorting effects, and governments providing them were required to withdraw such subsidies promptly upon confirmation of their existence. The actionable category comprised subsidies that harmed the domestic industries of other WTO members. The SCM Agreement didn't ban such subsidies but empowered affected members to take unilateral actions (e.g., countervailing duties) or multilateral measures to mitigate their negative impact. The now-expired, non-actionable category defended the subsidies with environmental, research, and development objectives. Article 31 encouraged WTO members to establish a committee responsible for reviewing and deciding on the extension of this category, with or without changes. The committee was established as recommended but couldn't reach a consensus on the extension due to disagreements between developed and developing countries. Developing nations believed that extending the non-actionable category in its original form would primarily benefit developed countries. These discussions occurred during the ongoing tension between developed and developing countries, resulting in the Seattle Ministerial Conference in 1999.

- **Role of Government Procurement**

Government procurement (GP) is a governmental initiative to acquire the goods and services required to perform its functions. It was previously exempted from non-discrimination obligations in international trade. The Agreement on Government Procurement (GPA) enforces national treatment

and most-favoured-nation (MFN) principles, but it applies only to WTO Members who have agreed to it. The Intergovernmental Panel on Climate Change recognised energy-efficient procurement as a tool for addressing climate change. This became indispensable to the global 'green' public procurement into different countries' climate change strategies. This also constitutes a significant portion of a country's GDP, especially in OECD countries and the European Union. This percentage could be even higher in developing countries. Government procurement is vital in promoting environmentally friendly products and stimulating the market for climate-friendly technology.

WTO's established aim is to promote sustainable development. The expiration of Article 8 in the SCM Agreement has led to government support measures categorised into actionable and prohibited criteria. This approach upholds the adverse economic effects of subsidies challenging the WTO's aim of working on sustainable development. It fails to consider that governments worldwide employ subsidies to pursue non-economic objectives, that as combating climate change. This approach is ethically inconsistent with the WTO Agreements. This doesn't align with the international trade system that permits the United States to ban shrimp imports to protect sea turtles (US–Shrimp case) while prohibiting subsidies for the renewable energy sector fighting against greenhouse gas emissions. Subsidising renewable energy under the SCM Agreement depends on the ambit of support measures for 'subsidies' under Article 1, the specificity requirements and in alignment with GATT Article XX.

WTO Jurisprudence on Renewable Energy Support Measures and Subsidies

Growing Renewable energy equipment manufacturing industries have become the focal point of generating all renewable energy support measures specific trade disputes. India, China, The United States, and the European Union are some of the WTO Members subsidising their renewable energy sector. Operating this lucrative global market for renewable energy technologies is the primary source of all trade disputes.

Parties to these disputes are some of the most significant greenhouse gas emitters. The United States, China, the European Union, India, and Japan comprise 60% of the greenhouse gas emissions globally. It is vital to have a check on policy tools to facilitate renewable energy adoption in their national energy portfolios. The scope of limiting decisions to the potential of manipulating and contorting trade is a sector to work on. It is essential to consider that these disputing nations are the providers of subsidies for renewable energy. According to estimates by the International Renewable Energy Agency (IRENA), in 2017, the European Union (54%), the United States (14%), Japan (11%), China

(9%), and India (2%) were considered for the total global renewable energy subsidies. The world needs varied and dynamic centres for manufacturing renewable energy equipment and making them economically viable, avoiding its concentration in the hands of few. The profound consequence of climate change can be addressed by developing domestic manufacturing capacity. International trade regulations have to be flexible to ensure support for such endeavours, helping in multilateral trade rules and enabling governments supported renewable electricity generation and production of such energy equipment.

- **India–Solar Cells and US–Countervailing Measures**

Content requirements associated with the Jawaharlal Nehru National Solar Mission (“NSM”) for solar cells and solar modules attracted the United States to call for consultations with India on 6 February 2013. This was because, according to the US, the content requirements were not consistent with Article III:4 of the GATT 1994; Article 2.1 of the TRIMs Agreement; and Articles 3.1(b), 3.2, 5(c), 6.3(a) and (c), and 25 of the SCM Agreement, and it also fatally affected the benefits of such Agreements utilised by the US.⁹

The imposition of countervailing duty measures by the United States brought China to its door, calling for consultations on 25 May 2012—particularly countervailing duty investigations, including led to the imposition of countervailing duties, which China challenged.¹⁰

In these cases, the renewable energy support measures were considered prohibited subsidies within Article 3.1(b) of the SCM Agreement (import substitution subsidies). These were subsidies dependent upon the use of imported renewable energy components.

- **EU and a Member State – Importation of Biodiesels**

Argentina requested consultations concerning specific measures significant to importing biodiesels for accounting-initiated consultations for biofuels target between Argentina, the European Union and Spain. The Spanish Ministerial Order regulates the allotment of biodiesel important for the ultimate target. This measure is the national implementation of the European Union regulatory framework for energy from renewable sources.¹¹

- **EU and Certain Member States – Importation and Marketing of Biodiesel and Measures Supporting the Biodiesel Industry**

⁹ [WT/DS456](#)

¹⁰ [WT/DS437](#)

¹¹ [WT/DS443](#)

States regarding the measures it felt affected the importation, marketing, and sale/demand of Argentinean biofuels in the EU. Argentina's request relates to promoting the use of renewable energy and introducing a mechanism to control and reduce GHG emissions, and (b) measures to establish support schemes for the biodiesel sector. Argentina considers that the measures inconsistent with, amongst others, Articles I and III GATT; Articles 1, 2, 3, 5, and 6 of the SCM Agreement; Articles 2 of the TRIMs Agreement; and Articles 2 and 5 of the Technical Barriers to Trade Agreement (TBT Agreement). Argentina referred to the TBT Agreement, which clearly expresses a preference for multilateralism¹³⁸ in that any technical barriers to trade – in this case, arguably, the EU's definition of 'sustainable' – be based on international standards and not be more restrictive than necessary in addressing some legitimate objective(s) contemplated by the TBT Agreement. Argentina contests EU measures and Member State implementation legislation pertinent to these that define as 'sustainable' such energy sources that reduce GHG emissions by at least 35% when compared to fossil fuels. Biofuel products reduce emissions by no more than 31%, thus more. qualifying under the EU definition. Argentina further challenges an EU measure requiring that certain fossil-fuel distributors also make available sustainable fuel through their distribution operations, given that its biofuels would be excluded. Argentina contends that this results in treatment less favourable for its products.¹²

A Step Towards Reforms

The scope of renewable energy governance has placed the WTO on a critical role, trying to use the WTO policies to facilitate a shift towards renewable energy sources. Further, with the dispute resolution system, the WTO stands out as one of the few seemingly efficient multilateral institutions capable of enforcing its legal mandates. While trade is just one aspect of global energy governance, it does affect global energy security and governance. Trade in renewable energy comprises various aspects, including production and transmission, thus implying the regulation of goods and services. To take a step ahead, certain aspects can be worked upon:

- **Shaping the green energy governance**

One has to shed light and accept the need to shift from fossil-based fuels to sustainable energy has been in vogue for some time. The United Nations Framework Convention on Climate Change (UNFCCC) and its Kyoto Protocol upheld the need for reducing greenhouse gas (GHG) emissions for sustainable environmental protection.

¹² WT/DS459

- **Local Content Requirements**

Disputes before the WTO surround local requirement contents in FIT schemes. It builds local energy security and seeks public support for nationalistic policies and job creation.

- **Alternate WTO waiver system**

Under this system, a Green Subsidy Fund backed by the UNFCCC system can be introduced. Subsidy under the Fund may be granted a full waiver from WTO rules. The subsidies require monitoring, which has to be reported along with signatories benefiting from technology transfers and support systems.

- **GHG Emissions Control**

Carbon emission costs are a 'hidden subsidy.' The State can levy GHG emissions control and related taxes on its resources to protect it from over-exploitation. Article 1.1(a)(1)(iii) of the SCM Agreement talks of 'financial contribution' therefore, if the government providing goods or services fails to charge such taxes, then it could be considered violative of Article 1 of the SCM Agreement. GHG emissions control can be indirectly achieved by redirecting fossil subsidies towards FIT schemes and working on renewable energy technologies.¹³

Conclusion

The international trade system has seen an uprise in the number of disputes on government support for renewable energy. The hesitance towards formally lodging a dispute challenging subsidies for fossil fuels is astonishing, although subsidies for fossil fuels are way ahead of renewable energy. A demand for shifting to clean energy calls for reforming anti-dumping and obstructing the unfair competition. Rules on subsidies still need research and development. To keep up with the rapid spread of renewable energy technology, domestic industries, through protectionist measures, have to be protected. However, tariff reduction can be employed when protection is traced for strategic trade policy considerations. Renewable energy is required to compete with heavily subsidised fossil fuels. Existing explanations for the absence of trade challenges to fossil fuel support policies are because of the WTO's lack of a mandate and the major non-members of GATT/WTO, who are fossil fuel-exporting nations.

¹³ *Supra* at 1.

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