REGIONAL TRADE AGREEMENTS VS. WTO: LEGAL OVERLAPS AND CONFLICTS

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Abstract: The past three decades have seen an unprecedented flourishing and deepening of Regional Trade Agreements (RTAs). The World Trade Organization (WTO) recognizes RTAs as exceptions to Most-Favoured-Nation (MFN) treatment under GATT Article XXIV, GATS Article V and the 1979 Enabling Clause. Yet practical and doctrinal tensions have grown as RTAs now often include "WTO-plus" and "WTO-extra" obligations, complex rules of origin (RoO), separate dispute settlement systems, and are sometimes unnotified or left under review by WTO bodies. This article highlights six main problem areas where RTAs overlap with and sometimes challenge the WTO legal framework: (1) textual vagueness and interpretation of WTO exceptions (Article XXIV/GATS V/Enabling Clause); (2) the empirical rise of preferential trade and erosion of MFN; (3) rules of origin and their protectionist or distributive effects; (4) notification and transparency gaps that weaken WTO oversight; (5) parallel dispute settlement mechanisms and resulting jurisprudential fragmentation; and (6) WTO-plus / TRIPS-plus content with implications for development. Each section combines doctrinal analysis, official data, WTO jurisprudence, and recent state practice (including Uzbekistan's regional positioning) to propose clear, legally-feasible reforms aimed at aligning regional dynamism with multilateral coherence.

Keywords: Regional Trade Agreements; WTO; Article XXIV; GATS Article V; rules of origin; dispute settlement; transparency; TRIPS-plus.

Introduction

The regional–multilateral balance is the key institutional challenge in today's trade law. WTO rules are built on non-discrimination and universality (MFN), but they also allow limited exceptions for preferential integration. Since the early 1990s, preferential treaties have multiplied. The WTO's RTA tracker lists about 375 RTAs currently in force (goods, services and accessions counted separately) and notes dozens of agreements that have not been properly notified. This reality carries legal weight. A large share of global trade now flows through preferential channels — UNCTAD and World Bank estimate nearly half of world trade is between PTA partners. Many RTAs

also go beyond tariffs, covering services, investment, digital trade and intellectual property. These "deep" commitments complicate the consistent application of WTO law and weaken uniform global legal standards [1]. This article examines six linked problem areas where RTAs and WTO law overlap and create legal uncertainty, policy friction and distributional effects. The focus is on legal dimensions — treaty texts, DSU case law, WTO committees and interpretive tools — but it is grounded in empirical facts: the number of RTAs, notification shortfalls, DSU usage, MPIA adoption and the complexity of rules of origin. The purpose is not to reject regionalism, but to show where the multilateral order must act — through stronger transparency, clearer interpretation and better procedural alignment. This way, RTAs can serve as testing grounds for future multilateral rules rather than lasting sources of fragmentation.

1. Legal architecture: WTO exceptions allowing RTAs

1.1 Primary treaty bases and their limits

WTO law formally authorizes certain preferential arrangements, but always as **derogations** from MFN and subject to conditions:

• **GATT 1994 — Article XXIV** permits customs unions and free trade areas that do not raise barriers to trade with third parties and that liberalize "substantially all the trade" among members; it also contemplates "reasonable" transitional periods and requires notification to the WTO. [2].

• **GATS — Article V** authorizes economic integration agreements in services with "substantial sectoral coverage" provided they do not raise overall barriers for non-parties. [3].

• **Enabling Clause (1979)** allows developed members to grant differential and preferential treatment to developing country members — the legal basis of most South–South preferential schemes. [4]. These provisions are purposefully conditioned: the multilateral treaty is hospitable to limited discrimination in the service of increased regional liberalization, but only if these schemes do not harm MFN or bring in external barriers. The legal difficulty is that the important terms like "substantially all the trade" and "substantial sectoral coverage" are imprecise and significant interpretive freedom is afforded to panels, members and negotiators. This imprecision at the textual level has political and legal consequences: it allows for groundbreaking RTA design (widely advantageous) but offers leeway to RTA frameworks inconsistent with the multilateral baseline.

1.2 Understanding on Article XXIV and panel jurisprudence

To mitigate ambiguity, WTO Members adopted the Understanding on the Interpretation of Article XXIV, and WTO panels have set interpretive limits (for example, the Panel in Turkey — Textiles and Clothing emphasized Article XXIV's exceptional character, requiring a strict reading) [Turkey DS34]. Nevertheless, the

Understanding supplies mainly **procedural** clarifications (notification, transitional periods) and does not produce a single, operational numeric test of "substantially all trade." Consequently, the door remains open for political practice to outrun legal discipline: many RTAs liberalize selectively, or in staged ways, yet are justified as Article XXIV arrangements. When notifications are incomplete or absent, the multilateral system cannot easily police the boundary. This legal lacuna is a recurring source of dispute and uncertainty. [2]

Analytic implication. The interpretive fuzziness of Article XXIV and Article V is not accidental; it reflects a negotiated compromise from an era when political appetite for rigid multilateral rules was limited. For contemporary governance, the absence of precise metrics creates litigation risk, encourages creative treaty design and demands stronger institutional scrutiny (notification, Secretariat review, CRTA engagement).

2. The empirical scale of RTAs and the erosion of MFN

2.1 How many RTAs, and how much trade is preferential?

Official WTO data and major international datasets show the extent of preferential regionalism. The WTO's RTA tracker records about **375 RTAs in force** (counting goods, services and accessions) and identifies **61 RTAs that are in force but have not been notified** to the WTO (i.e., they exist in practice but have not been scrutinized through WTO mechanisms). The RTA Facts & Figures (June 2025) confirms these totals and shows continuing year-on-year notifications and RTA activity. [1] UNCTAD/World Bank research indicates that **around half of world trade** occurs between partners covered by preferential agreements (the precise percentage depends on measurement choices and whether "preferential" is defined by tariff coverage or de facto preference utilization). The World Bank's Deep Trade Agreements (DTA) project and UNCTAD reports document that the number of PTAs has grown from some 50 in the early 1990s to several hundred by 2023 and that modern agreements typically cover many "behind the border" policy areas (services, investment, IP, digital trade) [World Bank DTA; UNCTAD]. [8]

2.2 Legal and distributional consequences for MFN

The MFN norm (GATT Article I) is central to WTO universality: any advantage granted to one trading partner must be extended to all. RTAs are exceptions to that rule — legally permissible but economically disruptive in certain circumstances. Where a growing share of trade takes place under preferential corridors, MFN becomes a **residual** principle in practice: the functional centrality of unconditional MFN declines despite its continuing legal force. From a legal standpoint, the erosion of MFN raises two problems:

1. **Access asymmetries:** Non-members may be disadvantaged; market access can be effectively partitioned along preferential lines. For

developing and least-developed countries (LDCs), this creates barriers to entry and complicates accession strategies.

2. **Administrative complexity:** Overlapping obligations increase compliance costs (e.g., multiple tariff schedules, different duty-free product lists, divergent RoO), raising the risk of hidden protectionism and litigation.

Empirical work (Bruegel, World Bank) shows that a small number of mega-RTAs account for a large part of the preferential coverage of global exports; these agreements intensify the sense that the world is fragmenting into a few competing regulatory blocs. This is legally significant because the WTO institutions are designed to maintain uniformity — not to arbitrate a patchwork of competing regulatory regimes. [7]

3. Rules of Origin (RoO): technical instrument, political economy device, legal blind spot

3.1 RoO: legal status and practical function. Rules of origin are administrative provisions in RTAs that determine whether a good qualifies for preferential treatment. RoO are typically highly technical (product-specific value-added tests, change-of-tariff-classification rules, cumulation rules), but they are fundamentally legal instruments that allocate market access. Notably, **RoO are not harmonized at the WTO level**: the WTO's competence is limited to transparency of RoO and notification of RoO annexes; it does not prescribe a single multilateral RoO code. Thus, RoO remain an RTA-level regulatory choice. [19]

3.2 The "spaghetti bowl" (overlap, cost, and protection). The term "spaghetti bowl" — popularized by Bhagwati — captures the tangle of overlapping RoO regimes. Empirical datasets (World Bank DTA, academic studies) show that modern RTAs have more elaborate RoO and that their heterogeneity increases compliance costs and reduces the practical utilization of preferences in some settings. For global value chains, inconsistent RoO can discourage firms from exploiting preferences or force them to re-structure input sourcing to meet a particular RTA's origin thresholds. Recent econometric studies find that complex RoO reduce preference utilization rates, especially for small exporting firms and low-income economies. [8]

3.3 Legal consequence: origin as a de-facto trade barrier. Because RoO are effectively membership screens, they can operate as a disguised form of protectionism when designed to be restrictive (high regional value content thresholds, limited cumulation). The WTO's limited supervisory power over RoO (mostly confined to the obligation to notify and to provide information) leaves an enforcement gap: if RoO are crafted to exclude non-members or to protect domestic value chains, the multilateral system lacks an effective, routine mechanism to harmonize or discipline such design choices. This gap has both legal and developmental consequences and therefore demands multilateral technical action (model RoO templates, Secretariat guidance) to reduce harmful heterogeneity.

4. Transparency, notification failures and the Committee on Regional Trade Agreements (CRTA)

4.1 Formal notification obligations and reality. WTO law requires members to notify RTAs (GATT Article XXIV:7; GATS Article V:7) and the WTO Secretariat operates a Transparency Mechanism for RTAs. In practice, however, **many RTAs are not fully notified** or are notified only partially (e.g., notifying tariff schedules but withholding RoO annexes or implementation protocols). WTO Secretariat publications and RTA Facts & Figures report that **dozens of RTAs in force remain unnotified** (the RTA facts of mid-2025 lists **61 RTAs identified but not yet notified**), and the CRTA often records outstanding documentation requests and incomplete implementation reports. The consequence is that the Secretariat and other Members are unable to conduct the Article XXIV "tests" (coverage of trade, impact on non-members, transitional measures) properly. [11]

4.2 Institutional friction in CRTA reviews. The Committee on Regional Trade Agreements (CRTA) performs the oversight role, but its effectiveness is limited by political constraints. Major RTA parties sometimes resist thorough scrutiny (for commercial or political reasons), and the CRTA's reviews are often constrained to factual notes rather than legal adjudication. The Secretariat produces objective reports when authorized, but the procedure depends on cooperation by the RTA parties. Legal scholars have characterized the WTO's supervision as "informational rather than sanctioning," and this institutional gap allows RTA practice to evolve with limited multilateral corrective power. [12]

Practical implication. Without timely and complete notifications, the Article XXIV exception cannot be meaningfully policed; the result is a widening practice-theory gap between treaty text and real-world RTA design.

5. Dispute settlement: parallel systems, forum shopping and jurisprudential fragmentation

5.1 The DSU and RTA dispute arrangements — normative priority but practical substitution. The WTO Dispute Settlement Understanding (DSU) is a centralized, rule-based mechanism created to ensure uniform interpretation of WTO obligations and to provide binding remedies. RTAs frequently contain their own dispute settlement procedures (state-to-state panels, arbitration, investor-state arbitration, joint committees). The coexistence of WTO and RTA dispute mechanisms raises several legal questions: (i) can RTA fora displace WTO jurisdiction? (ii) do RTA panel findings create de facto legal standards beyond the RTA parties? (iii) how to avoid conflicting outcomes across fora? The WTO jurisprudence has been clear that WTO obligations remain binding and cannot be displaced unilaterally by RTA law when a WTO claim is raised. Panels and the Appellate Body have rejected arguments

that an RTA can justify measures inconsistent with WTO obligations (see Mexico – Soft Drinks; Peru – Additional Duty). However, this legal priority is complicated in practice when the WTO appellate function is unavailable, or when RTA fora issue interpretations that create regional precedents. [Mexico DS308; Peru DS457]. [8]

5.2 Appellate Body paralysis and the rise of MPIA. A practical turning point occurred in late 2019 when the Appellate Body ceased to operate effectively because the U.S. blocked new appointments, leaving fewer than three members and therefore preventing new appeals. The paralysis of the Appellate Body undermined the DSU's final instance and encouraged alternative arrangements. In response, groups of Members established the **Multi-Party Interim Appeal Arbitration (MPIA)** (communication JOB/DSB/1/Add.12) to preserve an appellate-style review under Article 25 of the DSU. By 2024–25 the MPIA had attracted a large group of participatory members and was used in selected disputes (arbitration awards and agreed procedures recorded in WTO dispute files). While MPIA partly restores appellate review among participating Members, it is voluntary and creates a bifurcated appellate landscape: WTO members that are not MPIA participants cannot invoke MPIA, and the risk of parallel appellate pools increases jurisprudential divergence. [3]

5.3 Forum shopping and asymmetric bargaining power. Where RTAs provide faster remedies, or where RTA panels or arbitral mechanisms offer more predictable outcomes for powerful parties, there is an incentive to litigate regionally rather than multilaterally. This creates the risk that stronger members can shape dispute outcomes via choice of forum, while smaller or less resourced members face barriers to effective representation in complex regional fora. Furthermore, inconsistent findings across fora can produce legal uncertainty for traders and regulators — the exact opposite of the WTO's objective of predictable, uniform interpretation.

6. "WTO-Plus" and TRIPS-Plus content: innovation or restriction?

6.1 The empirical fact: RTAs increasingly contain deep disciplines. Modern RTAs commonly include commitments in services, investment, state-owned enterprises, digital trade, data flows, labour and environment — fields traditionally outside classic GATT tariff negotiation. The World Bank DTA database documents that **most RTAs concluded since the 2000s include a broad array of "deep" disciplines**, and that these commitments are often enforceable through RTA dispute settlement. By dint of being "WTO-plus," RTAs can promote convergence among their parties and act as experimental platforms. [8]

6.2 TRIPS-plus and development consequences. Intellectual property provisions in RTAs often go beyond the TRIPS minimum (so-called TRIPS-plus rules): longer patent terms, data exclusivity, restrictions on compulsory licensing, and investor protections touching on IP enforcement. Empirical and policy analyses (WHO, academic reviews, NGO studies) show that TRIPS-plus measures in RTAs can increase

medicine prices, delay generic entry and constrain public health policy space. For developing countries and accession candidates (like Uzbekistan), such TRIPS-plus obligations can materially constrain domestic industrial policy and health access while offering little commensurate gain in technology transfer or FDI in many cases. WTO and WHO reports emphasize the need to preserve TRIPS flexibilities, including the Doha Declaration's reaffirmation of public health safeguards. [14]

7. National and regional practice: selected examples (EU, US, Uzbekistan)

7.1 EU and US: powerful regional actors shaping global norms. Large regional actors illustrate the dynamic. The **European Union** negotiates FTAs under exclusive EU competence (TFEU Article 207), producing agreements with detailed regulatory chapters (trade and sustainable development, data protection, regulatory cooperation). The EU's capacity to produce comprehensive FTAs with internal legal coherence shows how a regional legal order can integrate with domestic constitutional frameworks; however, it also illustrates the challenge for non-EU WTO members facing EU-style regulatory standards. The **United States** similarly negotiates deep FTAs with enforceable IP and investment chapters, often including TRIPS-plus elements. These actors' RTAs have disproportionate normative reach, putting pressure on global standardization. [13]

7.2 Uzbekistan: accession context and regional commitments. Uzbekistan's external trade policy provides a practical example of the accession challenge. In 2024–2025 Uzbekistan concluded bilateral FTAs (e.g., with Turkmenistan effective 25 February 2025) and participates in regional preferential schemes (CIS/PTA frameworks; bilateral FTAs with Turkey, Pakistan and others). For Uzbekistan — an accession candidate that must compile tariff bindings, concessions and schedules consistent with WTO obligations — overlapping regional commitments pose negotiating complexities. Accession teams must reconcile pre-existing RTA concessions (tariff harmonization, RoO commitments) with the multilateral requirements under Article XXIV and GATS Article V and craft realistic transition timetables. Uzbekistan's practice exemplifies the practical legal friction between regional integration goals and multilateral obligations. [15]

8. Reform proposals: law, procedure and institutional design (detailed and actionable)

The preceding analysis shows that RTAs are neither inherently good nor bad: they are policy tools that require multilateral guardrails. Below I outline a prioritized reform agenda — legal and procedural steps that are **legally feasible** under current WTO architecture (i.e., mostly do not require formal amendments) and that would substantially reduce harmful overlaps.

8.1 Immediate, no-amendment steps (procedural and transparency reforms)

(A) Strengthen automatic transparency and mandatory completeness of

notifications.

Require that notification packages for RTAs (GATT Art. XXIV / GATS Art. V / Enabling Clause) include **tariff schedules, rules of origin, implementation protocols, safeguard clauses and dispute settlement texts** as a condition of CRTA "acceptance for consideration." The CRTA should publish a public compliance log showing outstanding documents and overdue notifications. This is procedurally possible under the CRTA and Secretariat rules and would greatly reduce the "shadow RTA" problem (RTAs in force but not submitted for review). [11]

(B)Secretariat technical reviews with publication presumption. Mandate that the Secretariat produce a neutral legal-economic review of each notified RTA within a fixed period (e.g., 120 days) and publish it unless a narrowly drawn confidentiality exception is invoked. Making reviews routine would expose questionable designs and provide authoritative analysis for Members and panels. (This uses existing Secretariat capacity and CRTA terms.) [11]

(C) Public "scoreboard" of RTA compliance. Institute a public dashboard (CRTA) listing RTAs, notification completeness, outstanding implementation reports and whether Secretariat reviews have been completed. This administrative transparency is low-cost and high-impact.

8.2 Doctrinal clarifications (interpretive guidance without formal treaty amendment)

(D) Authoritative interpretive guidance on "substantially all trade" and "substantial sectoral coverage." The General Council can adopt an authoritative interpretive decision clarifying Article XXIV and GATS V by consensus (analogous to earlier Understanding). Guidance could include **non-binding numeric benchmarks** (e.g., minimum percentage coverage of tariff lines or trade value for "substantially all trade"), sectoral floors, and criteria for acceptable transition periods. While politically sensitive, an agreed interpretive guidance would reduce legal vagueness and give panels clearer evaluative yardsticks. (This is an interpretive exercise under the WTO's existing institutional competence.) [2]

(E) Model RoO templates (voluntary, initially) with incentives. The WTO Secretariat should develop model RoO templates and a "best practice" guide (value content, change-of-tariff classification, cumulation options) that members can adopt. Participation could be incentivized by offering Secretariat technical assistance and fast-track review of model-compliant RTAs. Over time, common adoption would reduce the spaghetti bowl effect without coercive treaty amendment. The World Bank DTA toolkit provides a starting point for template development. [8]

8.3 Dispute settlement coherence (procedural alignment)

(F) Cross-reference and interpretive clauses in RTA dispute chapters. Encourage RTAs to include explicit clauses requiring that RTA panels interpret

obligations **consistently with WTO law** where WTO law is relevant and to publish reasoned decisions with explicit references to WTO precedent. While this will not confer appellate authority to RTA bodies, it will promote interpretive alignment and discourage outcomes that conflict with WTO jurisprudence. Many modern FTAs already adopt such language; the WTO should incentivize this practice through the Transparency Mechanism and CRTA recommendations. [8]

(G) MPIA expansion and eventual formalization. The MPIA (JOB/DSB/1/Add.12) shows that Members can construct interim appellate arrangements. The WTO should encourage broader participation in MPIA as a temporary measure while high-level negotiations to restore the Appellate Body continue. In parallel, an agreed roadmap should be negotiated to restore a universally accepted appellate function under reformed appointment and accountability procedures (e.g., clearer working procedures, term limits, greater transparency in reasoned opinions). [3]

8.4 Development and equity measures

(H) Technical assistance facility for accession and small members. Create a WTO-managed technical assistance fund to support accession candidates and low-income members in drafting RTA notifications, designing compliant RoO and representing themselves in DSU or MPIA proceedings. This responds to the substantive inequity where large members shape RTA design and smaller states lack capacity to participate fully. The facility could be financed by donor contributions and administered by the Secretariat's technical cooperation programs. [8]

(I) Model public policy carve-outs for TRIPS-plus safeguards. For RTAs that include TRIPS-plus measures, develop model "public health" safeguard clauses that preserve Doha flexibilities (compulsory licensing, parallel importation, emergencies) while allowing parties to coordinate on IP enforcement. This hybrid approach protects policy space for developing countries while allowing richer parties to secure higher IP standards regionally. WHO and WTO analyses provide the technical foundation for such model clauses. [14]

Conclusion

RTAs are now a structural feature of world trade. They provide policy experimentation and can promote deeper integration where the WTO's negotiating processes have stagnated. Yet their rapid proliferation and deep content generate legal overlaps and conflicts with WTO law: ambiguous Article XXIV/GATS V wording; RoO heterogeneity and protectionist risk; transparency failures; dispute settlement fragmentation (compounded by the Appellate Body crisis); and TRIPS-plus measures that constrain development policy space.

The solution is not to ban RTAs but to **strengthen the multilateral guardrails**: automatic and complete notification, routine Secretariat reviews, interpretive guidance

on Article XXIV and Article V, model RoO, dispute settlement alignment (including wider MPIA participation while the Appellate Body is restored), and targeted technical assistance for small and accession countries. These steps are legally feasible under current WTO procedures and politically realistic if Members perceive that they will increase predictability and fairness while preserving regional policy space.

For accession candidates (including Uzbekistan), the key practical advice is to: (a) undertake comprehensive legal audits of existing regional commitments before negotiating new RTAs; (b) ensure full, timely notification of RTAs to the WTO; (c) resist binding TRIPS-plus obligations without public health safeguards; and (d) seek technical assistance to align RoO and tariff schedules with accession offers. Doing so will protect policy flexibility while preserving access to multilateral dispute resolution and market access under WTO law.

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