



The Critical Chemicals Alliance

3rd monthly Import Trends Monitoring Tool report

September 2026

1. INTRODUCTION

The Import Trends Monitoring Tool, developed as part of the Critical Chemicals Alliance (CCA), monitors imports of chemical¹ and basic pharmaceutical products² to detect anomalous increases against historical trends aiming to support potential trade defence action.

Chemical companies and other stakeholders are encouraged to regularly monitor the monthly results and investigate anomalies promptly to assess whether follow-up with the European Commission's trade defence services is needed.

2. OUTCOME OF THE MONTHLY REPORT

This section summarises the Import Trends Monitoring Tool results based on data updated to June 2026.

The tool created an alert for 333 8-digit customs codes (from now on CN codes) with an import increase (out of a total 1370 CN codes pertaining to NACE 20 and 21.10), irrespective of the source of imports. A single CN code may generate more than one alert if the criteria are met for several extra-EU exporting

¹ Reflecting NACE 20 (Manufacture of Chemicals and Chemical products).

² Reflecting NACE 21.10 (Manufacture of Basic Pharmaceutical products).

countries. Therefore, the same CN code may be listed multiple times, each entry corresponding to a different import source.³

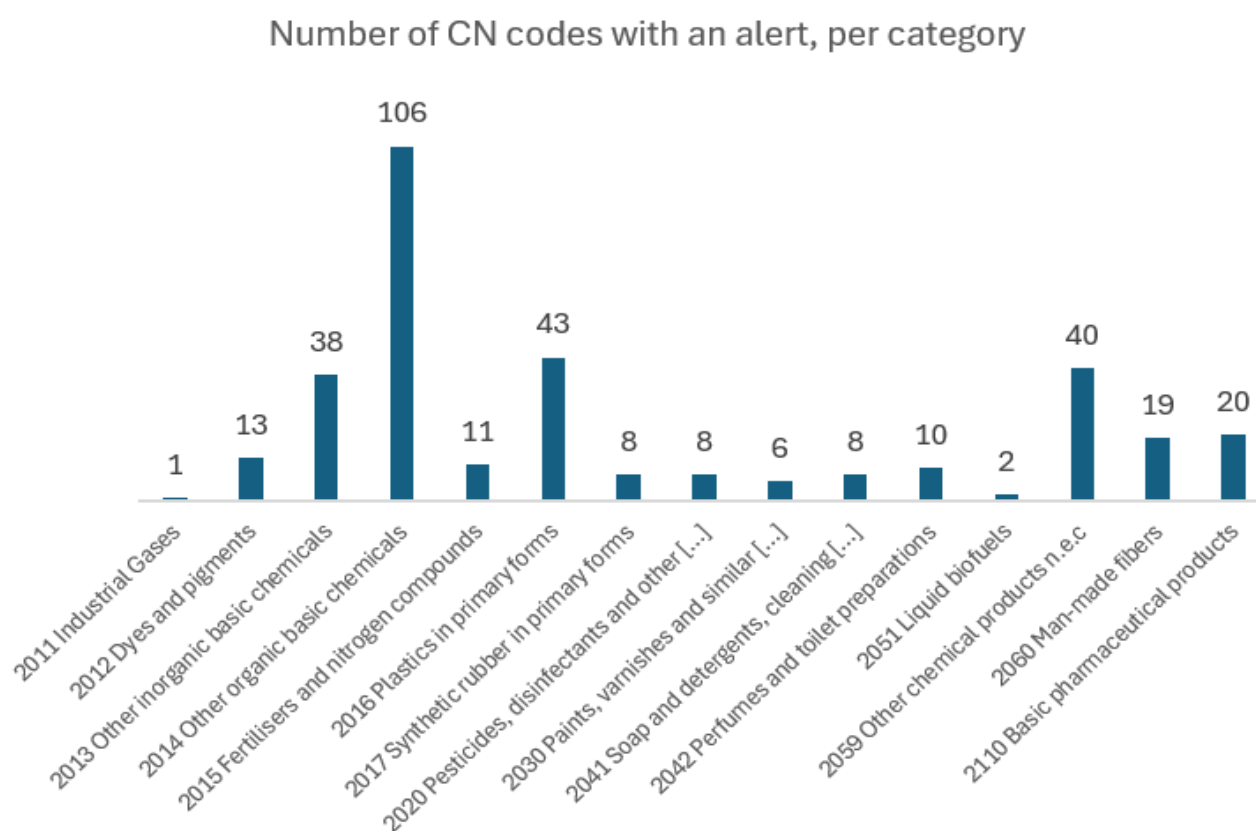
88 (22%) of the combinations of CN codes and export sources flagged this month were already flagged in the August 2026 report. The other 312 combinations of CN codes and extra-EU sources did not appear in the previous monthly report.

An alert indicates that a CN code may require further review and monitoring; it should not be read as evidence that trade defence action is necessarily warranted.

The corresponding Excel spreadsheet provides additional information on the CN codes for which an alert was triggered. Annex I explains the content of every column and how they should be read.

2.1. Summary of results related to NACE categories

The figure below shows the number of CN codes flagged with an alert in each 4-digit NACE category.⁴



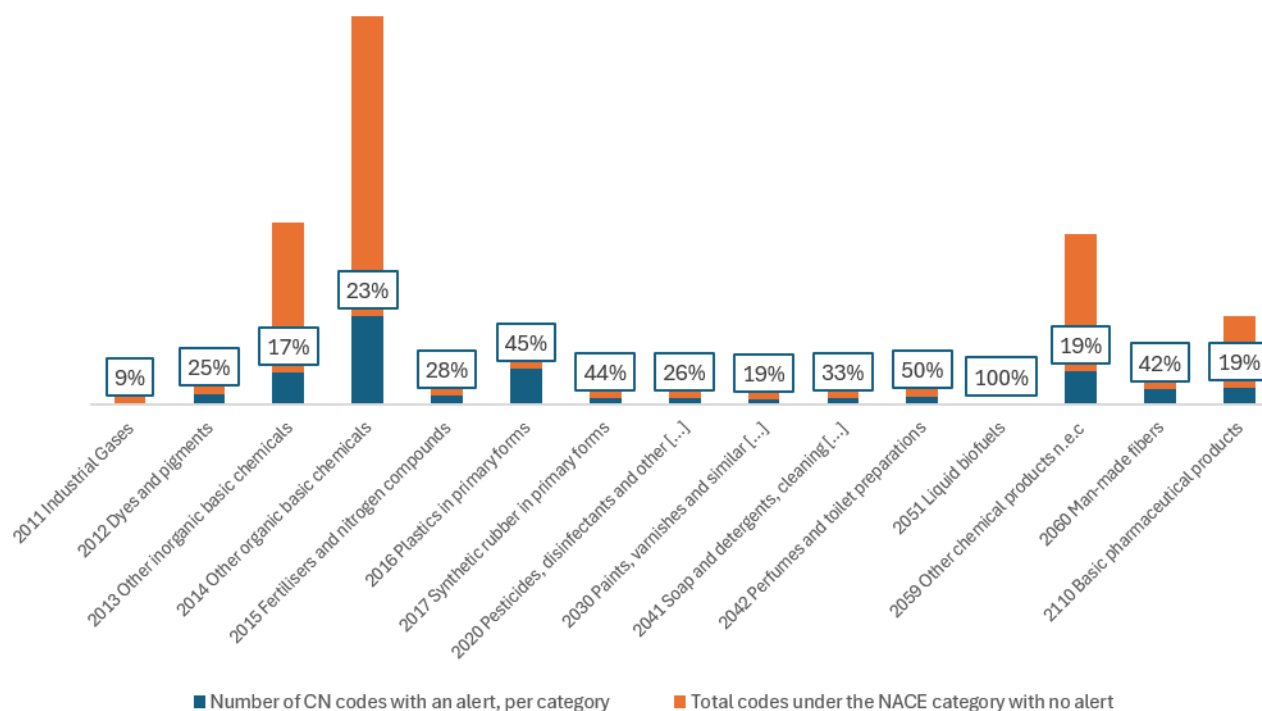
Source: CEFIC elaboration based on EUROSTAT data

When reviewing alert numbers, it should be noted that NACE categories vary in the number of CN codes they cover. The following breakdown shows flagged CN codes by NACE category as a share of the total CN codes in each category:

³ The total number of alerts, including all the potential combinations of CN codes and origins, is 400.

⁴ Reflecting NACE 20 and NACE 21.10.

% of CN codes in each NACE 4 category that produced an alert



Note: The NACE category 2051 “Liquid biofuels” contains only 2 CN codes.

Source: CEFIC elaboration based on EUROSTAT data

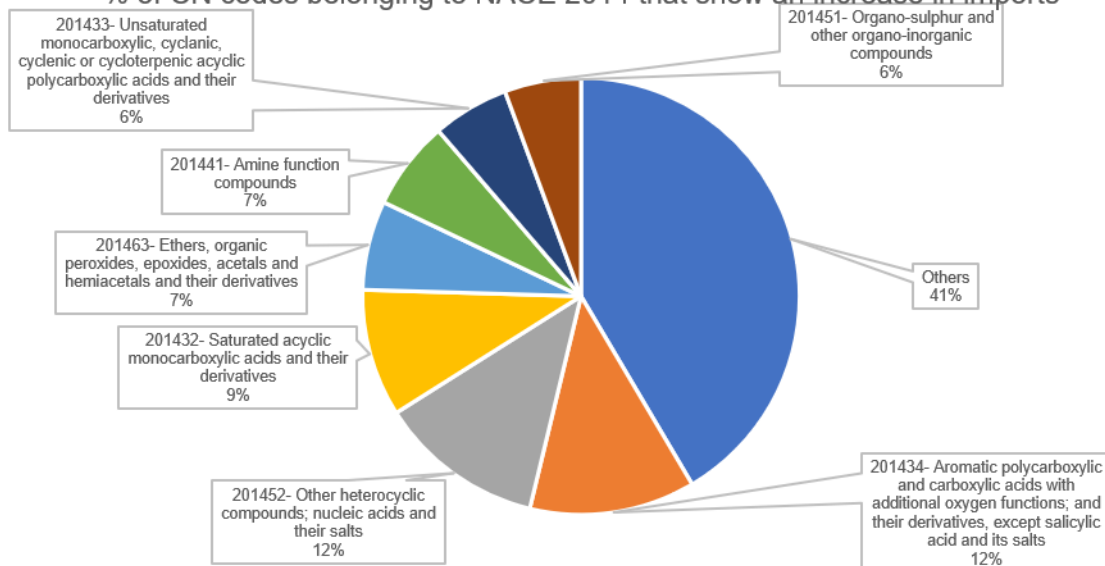
The highest number of alerts is recorded for Other organic basic chemicals (NACE 2014), with 106 CN codes. Plastics in primary forms (NACE 2016) is the second largest category by number of alerts (43). 40 alerts are recorded under the category Other chemical products n.e.c. (NACE 2059).

A more detailed breakdown at NACE 6-digit level shows the following:

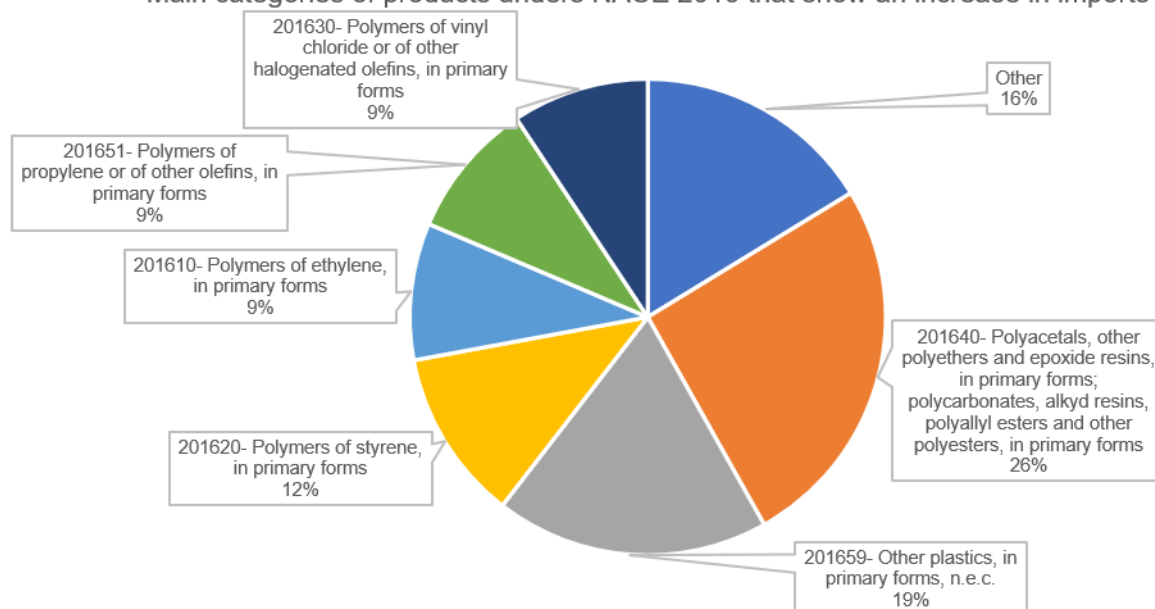
- Within Other organic basic chemicals (NACE 2014), around one third of alerts are concentrated in three subcategories: Aromatic polycarboxylic and carboxylic acids with additional oxygen functions; and their derivatives, except salicylic acid and its salts (NACE 2014.34), with 13 alerts; Other heterocyclic compounds; nucleic acids and their salts (NACE 2014.52), with 13 alerts; and Saturated acyclic monocarboxylic acids and their derivatives (NACE 2014.32), with 10 alerts.
- Within Plastics in primary forms (NACE 2016), the main subcategory showing import increases is Polyacetals, other polyethers and epoxide resins, in primary forms; polycarbonates, alkyd resins, polyallyl esters and other polyesters, in primary forms (NACE 2016.40), with 11 alerts.
- Within Other chemical products n.e.c. (NACE 2059), Pickling preparations; fluxes; prepared rubber accelerators; compound plasticisers and stabilisers for rubber or plastics; other catalytic preparations; other mixed alkylbenzenes and mixed alkyl naphthalenes (NACE 2059.56), together with Essential Oils (NACE 2059.70), both show 8 alerts.

The charts below show the distribution of alerts at NACE 6-digit level for the NACE 4-digit categories with the highest number of alerts.

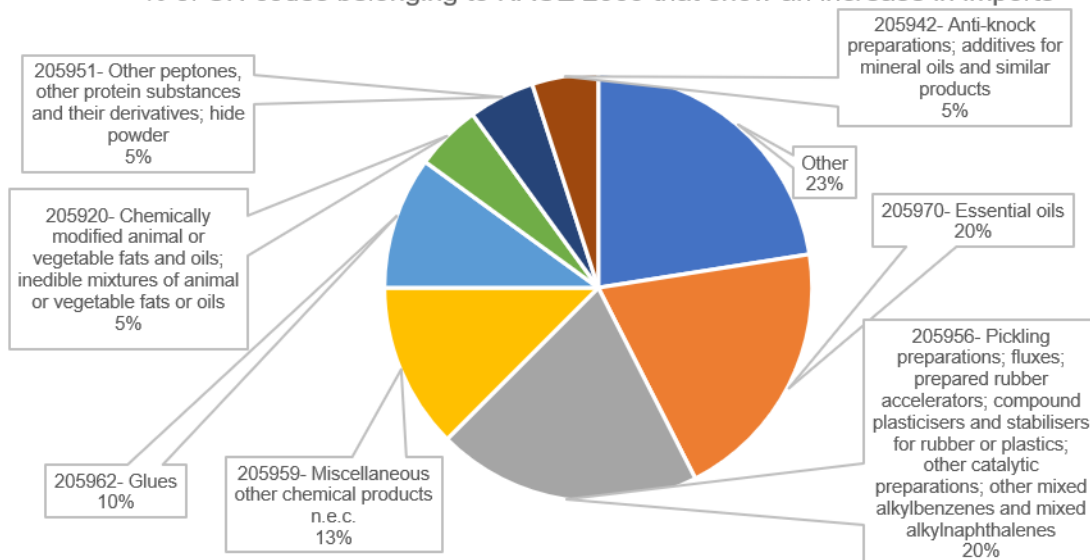
% of CN codes belonging to NACE 2014 that show an increase in imports



Main categories of products unders NACE 2016 that show an increase in imports



% of CN codes belonging to NACE 2059 that show an increase in imports



2.2. Comparison of results with Commission's Import Barometer (July 2026 issue)

The first report of the Commission's Import Barometer published in July 2026 by DG Trade flags 97 CN codes pertaining to the category of Chemical products (NACE 20) and 4 CN codes pertaining to the category of Basic pharmaceutical products (NACE 21.10).

73 of the flagged CN of the Import Barometer codes appear also in this month's Import Trends Monitoring Tool result list, which account for 72% overlap (considering only NACE 20 and NACE 21.10 CN codes flagged by the Import Barometer).

The remaining 28 products flagged by the Import Barometer, but not included in the Import Trends Monitoring Tool results, have been added to a separate sheet in the accompanying Excel file for information and to support the CCA analysis.

For further information about the Commission's Import Barometer methodology, and to download the result list and the Explanatory Note, please visit the [Import Barometer webpage](#).

2.3. Alerts related to CN codes currently covered by TDI measures

Several CN codes in the result list are already subject to trade defence measures currently in force, as shown below:

Product description	CN code	Country of import increase	Case code
Tri- and other polyhydric acyclic alcohols (excl. trimethylolpropane, pentaerythritol, mannitol, sorbitol and glycerol)	15180095	China	AD700 (Biodiesel)
Barium carbonate	28366000	India	AD723 (Barium Carbonate)
Tri- and other polyhydric acyclic alcohols (excl. 2-ethyl-2-"hydroxymethyl" propane-1,3-diol "trimethylolpropane", pentaerythritol, mannitol, d-glucitol "sorbitol" and glycerol)	29054900	China	AD699 (Erythritol)
Palmitic acid and its salts and esters	29157040	Indonesia	AD687 (Fatty Acid)
Salts and esters of citric acid (excl. inorganic or organic compounds of mercury)	29181500	China	AD522 (Citric acid)

Glutamic acid and its salts	29224200	China	AD521 (Monosodium glutamate MSG)
Separate chemically defined non-halogenated organo-phosphorous derivatives, n.e.s.	29314980	China	AD740 (Certain alkyl phosphonic acids and their sodium salts)
Melamine	29336100	China	AD554 (Melamine)
Double salts and mixtures of calcium nitrate and ammonium nitrate (excl. those in tablets or similar forms, or in packages with a gross weight of ≤ 10 kg)	31026000	Russia	AD330 (Ammonium nitrate)
Chemical products or preparations, predominantly composed of organic compounds, n.e.s. (excl. in liquid form at 20°C)	38249993	China	AD711 (Epoxy resins)
Biodiesel and mixtures thereof, not containing or containing < 70 % by weight of petroleum oils or oils obtained from bituminous minerals (excl. fatty-acid mono-alkyl esters containing by weight ≥ 96,5 % of esters "FAMAE")	38260090	Canada	AD531, AS532 (Biodiesel)
Poly"vinyl alcohol", in primary forms, whether or not containing unhydrolyzed acetate groups	39053000	China	AD654 (Polyvinyl alcohols (Certain) (PVA))
Acrylic polymers in primary forms (excl. poly"methyl methacrylate", poly[N-"3-hydroxyimino-1,1-dimethylbutyl"acrylamide], copolymer of 2-diisopropylaminoethyl methacrylate with decyl methacrylate in the form of a solution in N,N-dimethylacetamide, [...])	39069090	South Korea	AD681 (Superabsorbent polymers)
Epoxide resins, in primary forms	39073000	South Korea	AD711 (Epoxy resins)
High-tenacity filament yarn of polyesters (excl. that put up for retail sale)	54022000	China	AD690 and AD547 (Polyester yarn (High tenacity))

The list also identifies CN codes where import increases come from countries other than those currently subject to trade defence measures:

Product description	CN code	Country of import increase	Country subject to duty	Case code
Peroxisulphates "persulphates"	28334000	India	China	AD511 (Peroxisulphates (persulphates))
Carbides of tungsten, whether or not chemically defined	28499030	USA	China	AD238 (Tungsten carbide and fused tungsten carbide)
Epoxides, epoxyalcohols, epoxyphenols and epoxyethers, with a three-membered ring, and their halogenated, sulphonated, nitrated or nitrosated derivatives (excl. oxirane "ethylene oxide", methyloxirane "propylene oxide", 1-Chloro-2,3-epoxypropane "epichlorohydrin", dieldrin [ISO] [INN] and endrin "ISO")	29109000	USA	China, Taiwan, Thailand	AD711 (Epoxy resins)
Ethylvanillin "3-ethoxy-4-hydroxybenzaldehyde"	29124200	USA	China	AD708 (Vanillin)
Stearic acid and its salts and esters	29157050	China, Malaysia	Indonesia	AD687 (Fatty acid)
Oleic, linoleic or linolenic acids, their salts and esters (excl. inorganic or organic compounds of mercury)	29161500	Malaysia	Indonesia	AD687 (Fatty acid)
Terephthalic acid and its salts	29173600	Countries and territories extra-EU not specified	Mexico, South Korea	AD736 (Terephthalic acid)
Carboxylic acids with aldehyde or ketone function but without other oxygen function, their anhydrides, halides, peroxides, peroxyacids and their halogenated, sulphonated, nitrated or nitrosated derivatives	29183000	Switzerland	China	AD714 (Glyoxylic acid)
Lysine and its esters; salts thereof	29224100	Indonesia	China	AD706 (Lysine)
Separate chemically defined non-halogenated organo-phosphorous derivatives, n.e.s.	29314980	USA	China	AD740 (Certain alkyl phosphonic acids and their sodium salts)
Melamine	29336100	India	China	AD554 (Melamine)
Ammonium nitrate (excl. that in aqueous solution, in tablets or similar forms, or in packages with a gross weight of ≤ 10 kg)	31023090	Georgia	Russia	AD330 (Ammonium nitrate)

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Mineral or chemical fertilisers of animal or vegetable origin, in tablets or similar forms, or in packages with a gross weight of <= 10 kg	31051000	Tunisia	Russia	AD330 (Ammonium nitrate)
Mineral or chemical fertilisers containing phosphorus and potassium, with a nitrogen content > 10 % by weight on the dry anhydrous product (excl. those in tablets or similar forms, or in packages with a gross weight of <= 10 kg)	31052010	Norway	Russia	AD330 (Ammonium nitrate)
Mineral or chemical fertilisers containing nitrates and phosphates (excl. ammonium dihydrogenorthophosphate "Monoammonium phosphate", diammonium hydrogenorthophosphate "Diammonium phosphate", and those in tablets or similar forms, or in packages with a gross weight of <= 10 kg)	31055100	Kazakhstan, Morocco	Russia	AD330 (Ammonium nitrate)
Mineral or chemical fertilisers containing the two fertilising elements nitrogen (excl. nitrate) and phosphorus but not nitrates (excl. ammonium dihydrogenorthophosphate "monoammonium phosphate", diammonium hydrogenorthophosphate "diammonium phosphate" in tablets or similar forms, or in packages with a gross weight of <= 10 kg)	31055900	Türkiye, Serbia	Russia	AD330 (Ammonium nitrate)
Fatty acids, industrial, monocarboxylic; acid oils from refining (excl. stearic acid, oleic acid and tall oil fatty acids, distilled fatty acids and fatty acid distillate)	38231990	Argentina	Indonesia	AD687 (Fatty acid)
Chemical products or preparations, predominantly composed of organic compounds, in liquid form at 20°C, n.e.s.	38249992	Viet Nam	USA, China, Argentina, Indonesia, Canada, Taiwan, Thailand	AS532, AD531, AD700, AS650, AS644 (Biodiesel); AD694 (Alkyl Phosphate Esters); AD711 (Epoxy resins)
Fatty-acid mono-alkyl esters, containing by weight => 96,5 % of esters "FAMAE"	38260010	Thailand	USA, China, Argentina, Indonesia, Canada	AS532, AD531, AD700, AS644, AS650 (Biodiesel)
Biodiesel and mixtures thereof, not containing or containing < 70 % by weight of petroleum oils or oils obtained from bituminous minerals (excl. fatty-acid mono-alkyl esters containing by weight >= 96,5 % of esters "FAMAE")	38260090	Canada	China, Argentina, Indonesia	AD700, AS644, AS650 (Biodiesel)
Acrylonitrile-butadiene-styrene copolymers "ABS", in primary forms	39033000	China	South Korea, Taiwan	AD725 (Acrylonitrile-Butadiene – Styrene Resins)
Poly"vinyl chloride", in primary forms, not mixed with any other substances	39041000	China, South Korea, Taiwan	Egypt, USA	AD697 (Polyvinyl Chloride)
Epoxide resins, in primary forms	39073000	South Korea	China, Taiwan, Thailand	AD711 (Epoxy resins)
Poly"ethylene terephthalate", in primary forms, having a viscosity number of >= 78 ml/g	39076100	Egypt, Türkiye	China, India	AD693, AS426 (Polyethylene terephthalate (PET))
Textured filament yarn of nylon or other polyamides, with a linear density of <= 50 tex per single yarn (excl. sewing thread and yarn put up for retail sale)	54023100	Israel	China	AD735 (Polyamide yarns)
Filament yarn of nylon or other polyamides, incl. monofilament of < 67 decitex, single, untwisted or with a twist of <= 50 turns per metre (excl. sewing thread, yarn put up for retail sale, elastomeric yarn, high-tenacity yarn and textured yarn)	54024500	Viet Nam	China	AD735 (Polyamide yarns)

3. METHODOLOGY

3.1. Methods and data

The analysis focuses on CN codes reflecting NACE 20 and NACE 21.10 products, obtained from the CN correspondence tables available from the European Commission. The analysis is performed on values and quantities that are first aggregated in 12-month windows, which are updated on a rolling basis after every monthly report. The current monthly report includes four 12-months windows that cover the period from **July 2022 to June 2026**.

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To ensure relevant and meaningful results, only CN codes with a total import value of at least €7.5 million in the latest 12-month window are included; CN codes with negligible annual import value are excluded from the final list.

The analysis is conducted separately for each extra-EU exporting country. Only non-EU countries accounting for at least 10% of total EU imports of a given CN code in the latest 12-month window are considered. This approach avoids including countries with insignificant export volumes that would not contribute meaningfully to the analysis.

The tool assesses import quantities over a period of up to four years, while values-per-unit, used as a proxy for prices, are reviewed only for the latest twelve months. This allows volume trends to be tracked over a longer timeframe, while price indicators remain focused on recent market conditions.

3.2. Data limitations

In order to ensure both thoroughness and accessibility, the proposed tool utilises the EUROSTAT import/export dataset (COMEXT dataset DS-059322) as the basis for the analysis. This dataset is updated on a regular basis and typically offers comprehensive information, albeit with an average reporting lag of two to three months.

Several limitations have been identified during the review of data available in the COMEXT dataset:

- Presence of extra-EU quasi-transit data within the Intra-EU trade data: this phenomenon is referred to as “Rotterdam effect”, and it relates to the presence of an unquantifiable amount of extra-EU import data recorded also as Intra-EU import or export from single Member States. This is particularly true, but not exclusive for, the Netherlands and Belgium as they are major European ports. This inflates Intra-EU trade data;
- Absence of data on trade taking place within one Member State: this causes an underestimation of the real amount of Intra-EU trade data;
- Underreporting of trade values in intra-EU imports (“Arrivals”), which causes a non-negligible discrepancy with respect to trade values in intra-EU exports (“Dispatches”), which are thus considered more reliable by EUROSTAT;
- Different value reporting between imports and exports: usually at customs imports are declared in CIF (the Incoterm “Cost, Insurance and Freight”) while exports are declared in FOB (the Incoterm “Free on Board”). This may cause discrepancies when comparing values of the same CN code within the EU market and imported from abroad, as well as when computing mirror statistics with other countries. The OECD has published a document that allows to check for CIF/FOB margins by HS 6-digit code, updated to 2022.
- Granularity limitation: We note that no more detailed trade related public data than the CN 8-digit level is available. This can therefore limit the precision of the tool as CN codes often group different chemicals (CAS numbers) together.

3.3. Indicators

To detect possible harmful import trends, selected criteria examine both quantities and values-per-unit (“prices”). While prices are not directly available from the COMEXT dataset, they are proxied by dividing total values by quantities to obtain a weighted average. For extra-EU trade, these prices are determined by each exporting country outside the EU, whereas for intra-EU trade, they are based on intra-EU exports, considering the EU27 as an aggregate.

The following proposed criteria will be applied to individual extra-EU exporting countries as well as the relevant time periods:

Criterion identifier	Description	Formula
C1	Import quantity increase in the most recent 12 months of at least 5%	$\frac{[Q(T) - Q(T - 1)]}{Q(T - 1)} \geq 5\%$
C2	Import quantity increase by at least 5% in at least 2 out of 3 of the previous annual timeframes	With $g(t) = \frac{[Q(t) - Q(t-1)]}{Q(t-1)}$ for year t: $\mathbb{1}[g(t-1) \geq 0.05] + \mathbb{1}[g(t-2) \geq 0.05] \geq 1$
C3	Extra-EU values-per-unit lower than intra-EU values-per-unit* in the most recent 12 months	$vpu_extra(t) \leq vpu_intra(t)$
C4	Gap between extra-EU and Intra-EU values-per-unit* widening or stable in the most recent 12 months	$\frac{VPU_{extra(t)}}{VPU_{intra(t)}} \leq \frac{VPU_{extra(t-1)}}{VPU_{intra(t-1)}}$

Note: *see paragraph 3.1 for data limitations related to the calculation of prices. See Annex III for the detailed methodology.

CN codes that meet criteria C1 through C4 are flagged and included in the list published as part of the monthly report.

For replication purposes, Annex II explains the COMEXT data extraction process, while Annex III sets out the calculation methodology.

ANNEX I

- Columns (5) and (6) provide information on the relevance of the exporting country based on the export shares held by the country compared to the other extra-EU exporters of the CN code, and their evolution in the latest 12 month;
- Columns (7) and (8) provide information on the global EU27 imports of the CN code, disregarding the origin: it is possible that imports from a certain country show an increase, while the global imports remain stable or even decrease;
- Column (9) shows the value-per-unit of the extra-EU exporter relative to the intra-EU value-per-unit of the same CN code;
- Column (10) provides information on how much the imports of the product from the exporting country weight in the EU market of the same product; this measure of ‘market share’ is computed as the ratio of the quantity imported from the exporting country to the sum of (i) total imports of the same product from all extra-EU countries and (ii) intra-EU imports of the same product. However, due to (i) the Rotterdam effect, (ii) the fact that intra-country trade is not captured in Eurostat intra-EU trade statistics, and (iii) the fact that Member States are asked to report only 93% of the trade data collected from traders when reporting intra-EU imports, this measure should be interpreted with caution. In particular, its precise value may not be fully reliable and is therefore more informative as an indicator of the order of magnitude than as an exact estimate.
- Column (11) indicates whether the CN code has antidumping or antisubsidy duties active for the related extra-EU country or if duties are imposed on other countries;
- Column (12) provides information on whether the CN code, from a specific extra-EU exporter, was flagged in the previous monthly report.

ANNEX II

Extracting data from COMEXT database “DS-059322 - EU trade since 2002 by HS2-4-6 and CN8” and use of datasets.

Dataset 1:

- REPORTER: EU27_2020
- PARTNER: all partners available except: all single EU Member States; the aggregations related to Extra-EU; the aggregations related to Intra-EU; QR; QV; QY. The total number of partners used for this analysis is 225.
- PRODUCT: 1370 CN codes which in 2026 match⁵ to all NACE 20 and NACE 21.10 products.
- FLOW: import
- STAT_PROCEDURE: normal
- PERIOD: 4 aggregates that include months: from July 2022 to June 2023; from July 2023 to June 2024; from July 2024 to June 2025; from July 2025 to June 2026.
- INDICATORS: quantity in kg and value in EUR.

Dataset 2:

- REPORTER: EU27_2020
- PARTNER: INT_EU27_2020 and EXT_EU27_2020
- PRODUCT: 1370 CN codes which in 2026 match⁶ to all NACE 20 and NACE 21.10 products.
- FLOW: import and export
- STAT_PROCEDURE: normal
- PERIOD: months, from July 24 to June 26.
- INDICATORS: quantity in KG and value in EUR.

The two datasets are employed in the following way:

- **Dataset 1:** employed to perform the data cleaning process, to compute the annual aggregate value and the volume shares of the exporting countries. Then employed to apply criteria 1 and 2; then employed together with dataset 2 to apply criteria 3 and 4, as dataset 2 is used to compute intra-EU values-per-unit. Lastly, employed to build the informative columns that complement the list of CN codes with alarms in the Excel document.
- **Dataset 2:** employed together with dataset 1 to apply criteria 3 and 4, as dataset 2 is used to compute intra-EU values-per-unit. Then employed to build the informative column related to price comparison between extra-EU exporters and EU market that complements the list of CN codes in the Excel document. Finally employed to calculate the shares as % of the EU market, which is one of the informative columns that complement the list of CN codes in the Excel document.

⁵ CPA – CN Correspondence Tables 2026: [link](#).

⁶ CPA – CN Correspondence Tables 2026: [link](#).

ANNEX III

Further notes on the adopted methodology.

- Criterion C1: as a prudent measure, all instances where no quantities were imported of a certain product from a country in t-1 are interpreted as a % increase above the threshold of 5% in t;
- Criterion C2: as a prudent measure, all instances where no quantities were imported of a certain product from a country in t-2 or t-3 are interpreted as a % increase above the threshold of 5% respectively in t-1 or in t-2;
- Criterion C3: some choices have been made when computing intra-EU prices in order to comply with the existing data limitations. Due to the underreporting of intra-EU imports (“Arrivals”) values, it was not advisable to use the indicator for the computation of intra-EU prices and thus it was preferred to use intra-EU exports; only in the case of absence of intra-EU records, the calculation used EU27 extra-EU exports to compute prices;
- Criterion C4: as a prudent measure, all instances where no quantities were imported of a certain product from a country in t-1 are automatically considered as passing criterion 4.