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The Public Text

Ministry of Commerce of the People's Republic of China

The potato starch industry of the People's Republic of China has applied for a final review of anti-dumping measures for imported potato starch originating in the EU

Application for Final Review of Potato Starch Anti-Dumping Measures

Applicants at the end of the period:

China Starch Industry Association Potato Starch Branch

Applicant's Plenipotentiary Agent:

Beijing City Law Firm

November 16, 23

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Letter of confirmation

As the sole agent of the applicant applying for the final review of the anti-dumping measures applicable to imported potato starch products originating in the EU, we have all reviewed the application for the final review of the anti-dumping measures and its annexes, and signed the application for the final review of the anti-dumping measures on behalf of the applicant. Based on the information and information we currently have, we confirm that the contents of the application for an investigation at the end of the anti-dumping measures and the accompanying evidence are true and complete.

In accordance with the relevant provisions of the Anti-Dumping Regulations of the People's Republic of China, the application for investigation at the end of the period of anti-dumping measures is hereby formally filed.

Applicant's Plenipotentiary Agent: Beijing Law



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Before It's a word.

一、 Basic situation in anti-dumping cases

1- Submission of Applications

On December 29, 2005, Inner Mongolia Naren Agricultural Technology Co., Ltd., Heilongjiang Wohua potato products shares limited company, Daxing Anling Lisher starch company, Qinghai Wiston Biological Engineering Co., Inner Mongolia Co-Food Group, Gan Xingda starch industry limited liability company and Yunnan Zhongyangwei starch as the applicant, on behalf of the domestic potato starch industry, filed an anti-dumping investigation application to the Ministry of Commerce, and requested anti-dumping investigation of imported potato starch originally produced in the EU.

2 Initiation of investigation

On February 6, 2006, the Ministry of Commerce issued a notice in which it decided to conduct an anti-dumping investigation on imported potato starch originating in the European Union. The dumping investigation period covers the period from 1 January 2005 to 31 December 2005 and industrial damage investigation period from 1 January 2002 to 31 December 2005.

3) Preliminary decision

On August 18, 2006, the Ministry of Commerce issued a preliminary ruling notice, preliminary ruling that imported potato starch deposits originating in the European Union were dumped, the domestic potato starch industry suffered substantial damage, and there was a causal relationship between dumping and material damage. According to the relevant provisions of China's Anti-Dumping Regulations, the Tariff Commission of the State Council decided to implement temporary anti-dumping measures in the form of cash deposits for imported potato starch originating in the European Union from August 18, 2006.

4 The final decision

On February 5, 2007, the Ministry of Commerce issued an annual announcement No. 8, which finally ruled that the imported potato starch originating in the EU during the investigation period of the case was dumped, the domestic potato starch industry suffered substantial damage, and there was a causal relationship between dumping and material damage. According to the relevant provisions of China's Anti-Dumping Regulations, the Customs Tariff Commission of the State Council decided to impose anti-dumping duties on imported potato starch originating in the European Union from February 6, 2007, with a period of 5 years.

二、 Basic Situation of Cases for Mid-Term Review of Anti-Dumping Measures

1- Submission of Applications

On March 8, 2010, China Starch Industry Association potato starch professional committee as the applicant, on behalf of the domestic potato starch industry filed an anti-dumping period mid-term review application to the Ministry of Commerce, requesting the Ministry of Commerce to conduct a midterm review investigation of dumping and dumping margins of imported potato starch products originating in the EU, and improving the collection of imported potato starch products originating in the EU.

The anti-dumping duty.

2 Initiation of investigation

On April 19, 2010, the Ministry of Commerce issued a notice of filing and decided to review the anti-dumping measures applicable to potato starch originating in the European Union from the date of the announcement. The investigation period determined by the Ministry of Commerce is: From 1 April 2009 to 31 March 2010.

3- Decision

On April 18, 2011, the Ministry of Commerce issued the 16th annual anti-dumping period interim review decision announcement, decided to adjust the anti-dumping duty rate applied to imported potato starch originating in the European Union, and effective April 19, 2011.

三、 Basic Situation of Cases for the Final Review of First Anti-Dumping Measures

1- Submission of Applications

On June 21, 2021, the original "China Starch Industry Association Potato Starch Professional Committee" was renamed "China Starch Industry Association Potato Starch Branch".

On December 1, 2011, China Starch Industry Association potato starch professional committee on behalf of the domestic potato starch industry formally submitted an application for review of anti-dumping measures to the Ministry of Commerce, requesting the Ministry of Commerce to decide to maintain the anti-dumping measures applied to imported potato starch originating in the European Union.

2 Initiation of investigation

On February 3, 2012, the Ministry of Commerce issued Announcement No. 2 of the year, deciding to conduct a final review of the anti-dumping measures applied to imported potato starch originating in the EU. The dumping investigation period determined by the Ministry of Commerce is from January 1, 2011 to December 31, 2011, and the industrial damage investigation period is from January 1, 2007 to December 31, 2011.

3- Decision

On February 5, 2013, in accordance with Article 50 of the Anti-Dumping Regulations and the decision of the Tariff Commission of the State Council, the Ministry of Commerce issued an annual announcement No. 4 that, if the anti-dumping measures were terminated, the dumping of imported potato starch originating in the EU may continue to occur to China, and the damage caused by imported potato starch originating in the EU may occur again in China, and decided to continue to impose anti-dumping duties on imported potato starch originating in the EU for a period of five years from 6 February 2013.

四、 Basic Situation of Cases for the Final Review of Second Anti-Dumping Measures

1- Submission of Applications

On December 7, 2017, the China Starch Industry Association potato starch professional committee on behalf of the domestic potato starch industry formally submitted an application for the final review of anti-dumping measures to the Ministry of Commerce, requesting the Ministry of Commerce to decide to maintain the anti-dumping measures applied to imported potato starch originating in the European Union.

2 Initiation of investigation

On February 5, 2018, the Ministry of Commerce issued Announcement No. 2 of the year, deciding to conduct a final review of the anti-dumping measures applied to imported potato starch originating in the EU. The dumping investigation period determined by the Ministry of Commerce is from July 1, 2016 to June 30, 2017, and the industrial damage investigation period is from January 1, 2013 to June 30,

2017.

3- Decision

On February 1, 2019, in accordance with Article 50 of the Anti-Dumping Regulations and the decision of the Tariff Commission of the State Council, the Ministry of Commerce issued the Announcement No. 4 of the year, ruling that if the anti-dumping measures were terminated, the dumping of potato starch originating in the EU to China may continue or recur, and decided to continue to impose anti-dumping duties on imported potato starch originating in the EU for a period of five years from February 6, 2019.

五、 Basic information on the renaming review

On October 14, 2016, Coöperatie AVEBE U.A. filed an application with the Ministry of Commerce to apply the anti-dumping tax rate of the Dutch company AVEBE U.A. in potato starch anti-dumping measures.

On December 14, 2016, the Ministry of Commerce issued annual Notice No. 72, deciding that Coöperatie AVEBE U.A. inherits the 12.6% anti-dumping tax rate and other rights obligations applied by AVEBE U.A. of the Netherlands in the anti-dumping measures of potato starch. Potato starch exported to China under the name AVEBE U.A. of the Netherlands is subject to the 56.7% anti-dumping tax applicable to other EU companies in the potato starch anti-dumping measures.

On 13 January 2021, the Royal Co-operative Company (Coöperatie Koninklijke Avebe U.A.) filed an application to the Ministry of Commerce for the application of the anti-dumping tax rate of Coöperatie AVEBE U.A. in the potato starch anti-dumping measures.

On 8 March 2021, the Ministry of Commerce issued an annual bulletin No. 4 in which it decided that Coöperatie Koninklijke Avebe U.A. would inherit the 12.6% anti-dumping tax and other rights obligations applied by Coöperatie AVEBE U.A. in the anti-dumping measures of potato starch. Potato starch exported to China under the name Coöperatie AVEBE U.A. is subject to the anti-dumping tax rate of 56.7 per cent applied to other EU companies in the potato starch anti-dumping measures.

六、 Product Scope and Tax Rate of Anti-Dumping Measures Currently Applicable

According to the Ministry of Commerce Announcement No. 8 of 2007, Proclamation No. 16 of 2011, Proclamation No. 4 of 2013, Proclamation 72 of 2016, Proclamation No. 4 of 2019 and

Proclamation No. 4 of 2021, the range and tax rates of anti-dumping measures currently applied to imported potato starch originating in the EU are as follows:

1、 Scope of products

The names of the products under investigation determined in the original anti-dumping case are: Potato starch, also known as potato original starch, potato refined starch, potato raw powder, potato starch or potato starch. The English name is: The Potato Starch.

Specifically described as: Potato starch is a white powder composed of polyglucose molecules made up of potatoes as raw materials, and its physiochemical indicators are: Whiteness (457nm blue light reflectivity) $\geq 90\%$, moisture $\leq 20\%$, viscosity (4% concentration, 700cmg) $\geq 1100\text{BU}$, protein (dry substance content) $\leq 0.15\%$.

Main uses: Potato starch is mainly used in the food industry in China, is the production of emulsifiers, thickeners, stabilizers, swellers, excipients and other important raw materials, widely used in expansion food, convenience food, sausage, ham and other meat products, frozen food, sauce, mud, soup food, beverages, sauces, cooking, sugar, water product processing and other industries.

The product is subject to the Import and Export Tax Regulations of the People's Republic of China: 11081300.

2、 Anti-dumping duty rates

Name of business	Anti-dumping duty rates
ROQUETTE FRERES, France	56.7%
Coöperatie Koninklijke Avebe U.A.	12.6%
Ivebe Potato Starch Factory in Germany Avebe Kartoffelstärkefabrik Prignitz/Wendland GmbH	12.6%
Other companies All Others	56.7%

七、 Other trade remedies sought

(一) Basic situation in the case of countervailing cases

1- Submission of Applications

On June 30, 2010, China Starch Industry Association potato starch professional committee on behalf of the domestic potato starch industry submitted a written application to the Ministry of Commerce and Commerce, requesting a countervailing investigation of imported potato starch originating in the European Union.

2) Initiation of investigation

On August 30, 2010, the Ministry of Commerce issued Announcement No. 48 of the year, deciding to conduct a countervailing investigation on imported potato starch originating in the European Union. The subsidy investigation period determined by the Ministry of Commerce is from January 1, 2009 to December 31, 2009, and industrial damage investigation period from January 1, 2007 to December 31, 2009.

3) Preliminary decision

On May 16, 2011, the Ministry of Commerce issued an annual announcement No. 19, preliminary ruling that during the investigation period of the case, there is a subsidy of imported potato starch originating in the EU, China's domestic potato starch industry has suffered substantial damage, and there is a causal relationship between subsidies and material damage. According to the announcement of the above preliminary ruling and the relevant provisions of the Regulations of the People's Republic of China on Countervailing, the Customs Tariff Commission of the State Council decided to implement temporary countervailing measures on imported potato starch originating in the European Union in the form of temporary countervailing tax deposits from May 19, 2011.

4) The final decision

On September 16, 2011, the Ministry of Commerce issued an annual announcement No. 54, which finally ruled that during the investigation period of the case, there are subsidies for imported potato starch originating in the EU, China's domestic potato starch industry has suffered substantial damage, and there is a causal relationship between subsidies and material damage. In accordance with the above announcement of the final ruling and the relevant provisions of the Regulations of the People's Republic of China on Countervailing, the Customs Tariff Commission of the State Council decided to impose a countervailing duty on imported potato starch originating in the European Union for a period of five years from September 17, 2011.

(二) Basic situation in case review at the end of the first countervailing period

1- Submission of Applications

On July 15, 2016, China Starch Industry Association potato starch professional committee on behalf of the domestic potato starch industry formally submitted to the Ministry of Commerce an application for the final review of countervailing measures, requesting the Ministry of Commerce to decide to maintain the anti-subsidy measures applied to imported potato starch originating in the European Union.

2 Initiation of investigation

On September 14, 2016, the Ministry of Commerce issued a notice in which it decided to conduct a final review of the countervailing measures applied to imported potato starch originating in the European Union. The subsidy investigation period determined by the Ministry of Commerce is from April 1, 2015 to March 31, 2016, and the industrial damage investigation period is from January 1, 2012 to March 31, 2016.

3- Decision

On September 15, 2017, in accordance with Article 47 of the Countervailing Regulations and the decision of the Tariff Commission of the State Council, the Ministry of Commerce issued the 38th Announcement of the year, the final ruling that if the countervailing measures are terminated, the imported potato starch subsidies originating in the EU can continue or recur, if the countervailing measures are terminated, the damage to the domestic potato starch industry may continue or repeat, and decided to continue to impose anti-subsidy duties on imported potato starch originally produced in the EU for a period of 5 years from September 16, 2017.

(三) Basic situation in case review at the end of the second countervailing period

1- Submission of Applications

On July 11, 2022, the potato starch branch of China Starch Industry Association on behalf of the domestic potato starch industry formally submitted to the Ministry of Commerce an application for the final review of countervailing measures, requesting the Ministry of Commerce to continue to maintain the anti-subsidy measures applied to imported potato starch originating in the European Union.

2 Initiation of investigation

On September 15, 2022, the Ministry of Commerce issued a notice in which it decided to conduct a final review of the countervailing measures applied to imported potato starch originating in the EU. The subsidy investigation period for this review determined by the Ministry of Commerce is from April 1, 2021 to March 31, 2022, and the industrial damage investigation period is from January 1, 2018

to March 31, 2022. At the same time, the anti-subsidy measures applicable to imported potato starch originating in the UK will expire on 16 September 2022.

3- Decision

On September 14, 2023, in accordance with Article 47 of the Countervailing Regulations and the decision of the Tariff Commission of the State Council, the Ministry of Commerce issued the annual Proclamation 33rd, finally decided that if the countervailing measures were terminated, the imported potato starch subsidies originating in the EU could continue or recur, if the anti-subsidy measures were terminated, the damage to the domestic potato starch industry may continue or repeat, and decided to continue to impose countervailing duties on imported potato starch originally produced in the EU for a period of 5 years from September 16, 2023.

(四) Basic information on the renaming review

On 14 October 2016, Coöperatie AVEBE U.A. filed an application with the Ministry of Commerce to apply the countervailing tax rate of the Dutch company AVEBE U.A. in potato starch countervailing measures.

On December 14, 2016, the Ministry of Commerce issued annual Notice No. 72, deciding that Coöperatie AVEBE U.A. applies the 12.4% countervailing tax rate and other rights obligations applied by AVEBE U.A. of the Netherlands in the potato starch countervailing measures. Potato starch exported to China under the name AVEBE U.A. of the Netherlands is appropriate to the 12.4% countervailing rate applied to other EU companies under the potato starch countervailing measures.

On 13 January 2021, the Royal Co-operative Company (Coöperatie Koninklijke Avebe U.A.) submitted an application to the Ministry of Commerce for the application of the countervailing tax rate of Coöperatie AVEBE U.A. in the potato starch countervailing measures.

On 8 March 2021, the Ministry of Commerce issued an annual bulletin No. 4 in which it decided that Coöperatie Koninklijke Avebe U.A. would inherit Coöperatie AVEBE U.A.'s 12.4% anti-subsidy tax rate and other rights obligations applied by Coöperatie Koninklijke Avebe U.A. in the anti-substitution measures of potato starch. Potato starch exported to China under the name Coöperatie AVEBE U.A. is subject to the 12.4% countervailing rate applied to other EU companies in the potato starch countervailing measures.

(五) Currently applicable countervailing tax rates

Name of business	Countervailing tax rates
ROQUETTE FRERES, France	7.5%
Coöperatie Koninklijke Avebe U.A.	12.4%
Ivebe Potato Starch Factory in Germany Avebe Kartoffelstärkefabrik Prignitz/Wendland GmbH	12.4%
Other companies All Others	12.4%

八、 Notification of expiry of anti-dumping measures

On June 30, 2023, the Trade Relief Bureau of the Ministry of Commerce issued the Notice on the Expiration of Partial Anti-Dumping Measures in the First Half of 2024. According to the relevant provisions of the notice, the anti-dumping measures applied to imported potato starch originating in the EU will expire on February 5, 2024, and the domestic industry or natural persons, legal persons or organizations representing the domestic industry may submit a final review application to the Ministry of Commerce in writing 60 days before the expiry date of the measure.

IX. Note on the British Question

On January 29, 2021, the Ministry of Commerce issued the Announcement on the Treatment of Trade Relief Cases in Europe and the United Kingdom after Brexit, which stipulates that the new trade relief investigation and review cases initiated by the EU after 31 December 2020 will no longer be treated as a member country of the United Kingdom.

In the application for review at the end of the period, taking into account the actual situation of British potato starch, the applicant will no longer apply for the final review of anti-dumping measures against imported potato starch originating in the UK. At the same time, unless specified, the EU-related data in this application for the first half of 2019 to 2023 are also EU-27 countries, excluding the UK.

X. Reasons and requests for the application for review at the end of the period

For the reasons and reasons stated in this application, the applicant considers that: If the anti-dumping measures are terminated, the dumping of potato starch originating in the EU and exported to China will continue or recur; If anti-dumping measures are terminated, the damage caused by imported potato starch products originating in the EU to the domestic potato starch industry may continue or recur. At

the same time, the applicant believes that continuing to take anti-dumping measures is in the public interest of the People's Republic of China.

Therefore, in order to safeguard the legitimate rights and interests of the domestic potato starch industry, in accordance with the Anti-Dumping Regulations of the People's Republic of China (hereinafter referred to as the "anti-dumping regulations") and other relevant provisions, the applicant requested the Ministry of Commerce to conduct a final review of the anti-dumping measures applied to imported potato starch products originating in the European Union, and recommending to the Customs Tariff Committee of the State Council that imported potato starch products originating in the EU be determined in accordance with the Ministry of Commerce Announcement No. 8 of 2007, Announcement No. 16 of 2011, Proclamation No. 4 of 2013, Proclamation No. 72 of 2016, Proclamation No. 4, 2016 and Scope of Products No. 4 and 2021. the rate continues to impose anti-dumping duties with a period of 5 years.

Part I. Body of Application

Relevant Stakeholders and Information

(1) Terminal review of the applicant and the domestic similar product production enterprises

(1) Relevant information from the applicant

It's a name. It is called: China Starch Industry Association Potato Starch Branch

The land. The site: Inner Mongolia, Hohhot City and Linkel County and No. 98 Qing Road

The Postal Code: 010010

Responsible person: Zhou Qingfeng

Contact person in the case: Go, Ray.

Contact the phone: 0471-7191585-8812

It's a fax: 0471-7195494

(Please refer to Annex I: Certificate of registration and authorization of branches of the applicant's social group")

The potato starch branch of the China Starch Industry Association (hereinafter referred to as the "applicant") is a national industry organization of related enterprises, institutions and related industries such as potato starch processing and deep processing, application, circulation, scientific research, equipment manufacturing and other related enterprises, institutions and related industry workers, and is a not-for-profit social group.

The applicant believes that the potato starch processing and deep processing industry service for the purpose of promoting the stable and healthy development of the industry, one of the important duties is to "coordinate and protect domestic potato starch products to participate in international market competition, prevent technical barriers and trade barriers according to the WTO's free trade, fair trade rules and national laws and regulations." Oppose and resist unfair competition contrary to the principles of fair trade, oppose and resist unfair dumping and subsidies, maintain the normal and fair market order of domestic potato starch, and protect the domestic potato

starch industry and the three agro-industries in poor areas.

At present, the applicant has a total of 58 member units that produce potato starch (optimal grade and first grade) are large domestic scale, and representative and influential enterprises, the combined output accounts for the main part of the total domestic potato starch production.

In view of China's anti-dumping measures for imports of potato starch originating in the EU is about to expire, according to the spirit of the internal meeting, it was decided to use the China Starch Industry Association potato starch branch as the applicant, in accordance with the relevant provisions of the Anti-Dumping Regulations, on behalf of the domestic potato starch industry to the Ministry of Commerce to submit to the Ministry of Commerce the application of anti-dumping measures applied to the EU import of potato starch products (see "annex II: Annex II::Potato starch anti-dumping period review of the final review of the proceedings of the potato starch).

(2) Agent entrusted by the applicant

In order to apply for the purpose of the final review of anti-dumping measures, the applicant authorizes Beijing Beau Heng legal affairs to make its full representative, the representative to discuss the application and investigation work at the end of the period, and the specific representation authority is provided in the power of attorney authorization. (Please see "Annex I:Registration certificate of the applicant's social group branch and power of attorney")

According to the request of the applicant, the Beijing Law Firm of Bohn assigned the firm's lawyer Guo Dongping and Mr. Lanxiong to jointly handle all the matters entrusted by the petitioner in connection with the case. (Please refer to Annex IV:Attorney assignments and attorney's practising certificates")

The Plenipotentiary Agent of the Applicant at the end of the period:

Beijing City Law Firm

LawyerGuo Dongping. Attorney's
Certificate:11101200310402136

Practitioner's

TheBlue Lawyer Attorney's Practitioner's Certificate:11101200310817778

The land. The site:No. 23 Huang Temple Street, Beijing's West City District, Room 1205 of Beiguang Tower
Thepost. Part of:100120
It's the electricity. The word:010-82230591/2/3/4
Pass it on. It really is:010-82230598
Thee-mail:Please contact us at gdp@bohenglaw.com
Thenetwork The site:www.bohenglaw.com

Relevant information on domestic production enterprises of similar products

The applicant is the industry organization of the domestic potato starch industry, there are currently 58 potato starch production enterprise member units. Due to the large number of production enterprises, the applicant lists the contact information of some major production enterprises (the following rankings do not distinguish:

- (1) Name of the company:Inner Mongolia Hua Europe Starch Industry Co., Ltd.
Company address:Inner Mongolia, Hohhot and Lin County, 98.
Contact the phone:0471-7191585
- (2) Name of the company:Monsen Agricultural Technology Co., Inc., Inner Mongolia
Company address:Inner Mongolia Autonomous Region, Matsun Hills, Chifeng Municipality.
Contact the phone:0476-8428888
- (3) Name of the company:Inner Mongolia Silver Starch Products Co., Ltd., company address:Central Flag Green Industrial Park in Ulanhob Municipality Contact:13947153893
- (4) Name of the company:Inner Mongolia Liren Starch Products Co., Ltd.
Company address:In the Inner Mongolia Autonomous Region, four sons of Wang Fangzhong 8 Township East Village, Ulanhob Municipality of Inner Mongolia0474-5589127
- (5) Name of the company:Solid Priva Starch Co., Ltd.
Company address:Ningxia Hui Autonomous Region
Contact the phone:0954-2698888
- (6) Name of the company:Honda Starch Processing Co., Ltd., company address:Gansu Province,

Pingzhou Province, Zhuzhen Town Gonggu Village Contact Phone:0933-6739009

(7) Name of the company:Paddock Manchu Mongolia Autonomous County Binhao Potato Starch Co., Ltd. company address:Hebei Province, Chende City paddock, Manchuan Mongolian Autonomous County, Shanguchi Bay Village, Hebei Province:13503345418

(8) Name of the company:Company address of Zhang Jiakou Fu Xin Agricultural Development Co., Ltd.:Zhangjiakou City to inspect the Sand Trench Town Industrial Park in the North Management District Contact Phone:18832396651

(9) Name of the company:Chende Hui Double Starch Co., Ltd.
Company address:Paddock Manchu Mongolian Autonomous County Sh 8k Village in Half-Tai Township Contact Phone:0314-7936886

(10) Name of the company:The Great Wall Starch Co., Ltd.
Company address:Ningxia Hui Autonomous Region Contact phone number in the former district of Zhongguan District:0954-2640998

(11) Name of the company:Kanbe County Yunze Agricultural Science and Technology Development Co., Ltd.
Company address:The market town of Shijingjing Town in Dingbian County, Yulin City, Shaanxi Province, one kilometre to the north0912-4331046

(12) Name of the company:Qinghai Wiston potato Group Limited Liability Company
Company address:Qinghai Biotechnology Industrial Park via Second Road 62 Third River International Building 4th Floor Contact Phone:0971-5317877

(13) Name of the company:Hualun Bell Green Ecological Agricultural Development Co., Ltd., Owenk Autonomous Flag Starch Factory Company address:Inner Mongolia Autonomous Region, the Owenk autonomous flag geese mining area of the Owenk autonomous city of Inner Mongolia Autonomous Region contact phone:0470-8243111

(14) Name of the company:Yasher Starch Group Co., Ltd.
Company address:Ningxia Hui Autonomous Region, Ningxia Hui Autonomous Region, Ningxia Huijiang District, West Kanjiang Street and Peace District Building 2 Contact

Phone:0954-2086037

(15) Name of the company:Xinjiang Wan Agricultural Technology Development Co., Ltd.

Company address:Xinjiang Ilhu Kazakh Autonomous Region, seventy-seventh regiment
Three Company Peace Road 21 contact phone:18909969180

(16) Name of the company:North Big Aboriginal Group Limited

Company address:386 Yangtze River Road in Harbin City, Heilongjiang Province:0451-
55396295

(17) Name of the company:Yuming Starch Co., Ltd., company address:Contact the village of
Bizhuang, Penburg Town, former district of Guyuan City:18995419500

(18) Name of the company:Qinghai River Starch Co., Ltd.

Company address:36 Zhu Jiazhuang Road, East District of Xining City, Qinghai Province
Contact the phone:13897652534

(19) Name of the company:The company address of Fengyuan potato industry limited liability
company in Minle County:Contact telephone for the Eco-Industrial Park of Zhang Xuan
Citizen Le County, Gansu Province:0936-4282666

(20) Name of the company:Ningxia Wall Starch Co., Ltd.

Company address:Ningxia Guyuan City's former state district Zhang Yizhen will contact the
road (34 km) by telephone:0954-6538888

(21) Name of the company:Ningxia Fu Potato Industry Limited

Company address:Room 309, room 309 Yuning Property Building, Yuning Industrial Park
East District, Jiqiang County, Ning Xiaguyuhara City:18309647448

(22) Name of the company:Gansu Blue Sky Potato Industry Development Co., Ltd.

Company address:North of Dingxi Ansing District, Gansu Province
Contact the phone:0932-6960545

(23) Name of the company:Yunnan Yun Starch Co., Ltd.

Company address:Yunnan Province, Xiangwei City, Huade Town, Yunnan Province

Contact the phone:0874-7071111

(24) Name of the company:Inner Mongolia potato Yuankang Biotechnology Co., Ltd.

Company address:Village No. 9 of Wukhuan County, Inner Mongolia Autonomous Region

Contact the phone:0471-8817618

(25) Name of the company:Gansu Lian Snow Starch Co., Ltd.

Company address:Gansu Silver City West City Industrial Development Zone in Ning County

Contact the phone:18393873810

4, the proportion of the production of similar products represented by the applicant before the date of submission of the application

The Unit:Thousands of tons.

Project/ Period	2019in	In2020	In2021	In2022	January-June2023
Total production of potato starch by the applicant's	32.72	45.75	50.14	37.61	7.73
Total national production of	43.97	63.67	65.33	48.82	9.21
Applicant's representative production accounts for	74.41%	71.85%	76.75%	77.03%	83.94%

Note to:(1) The total production data of the potato starch representative of the applicant can be found in Annex III:Member units of potato starch production enterprises";

(2) The total national production data of potato starch can be found in Annex V:A description of the supply and demand for potato starch in China and the European Union.

The above data show that:Between 2019 and the first half of 2023, the total production of potato starch represented by the applicant accounted for more than 50% of China's total production during the same period, accounting for the main part of the total national production, in line with the provisions of the Anti-Dumping Regulations on the applicant's subject qualifications.

(2) Introduction of the domestic potato starch industry

Potato starch is a white powder composed of polyglucose molecules made up of potatoes as raw materials, with high whiteness, high transparency, high viscosity, low paste temperature, high polymerization, low protein, low fat residue, low acidity, good membrane, resistance to condensation and other characteristics, widely used in food, medicine, petrochemicals, papermaking, textile, feed, fermentation, casting, building

materials and other industrial fields. Because potato starch has the unique quality and function of other starch can not replace, it has become the preferred additive for most of the famous food in the world.

China is a large agricultural country, the total production of potatoes ranks first in the world, but the starch processing industry is relatively backward. The earliest potato starch industry originated in three small factories (Mingshui, Nahe, Kishan) established in the northeast during the Japanese invasion of China. In the late 1980s, some small equipment and simple process factory production appeared in Nemon and Shanxi, but the production capacity was only more than 3,000 tons. In the 1990s, China began to introduce modern production equipment and processing technology on a large scale, so that the domestic potato starch production level has been greatly improved, and entered a period of rapid development. Since 2001, after solving the "three farmers" problem, the development of the west, and revitalizing the old northeast and other industrial policies, the provinces with resources have set off a boom in building factories. Through years of exploration, the domestic potato starch industry has formed a certain scale, the product quality of potato starch has reached the international standards of similar products, potato starch production has entered the world's advanced level.

However, this has not brought due benefits and benign development to the domestic potato starch industry. Since 2002, EU potato starch manufacturers in order to seize the Chinese market, began to frequently distribute a large number of potato starch to China through low prices and unfair competition means, leading to the domestic potato starch industry has repeatedly suffered serious substantial damage.

After the application of the domestic industry, the Ministry of Commerce opened anti-dumping investigations and countervailing investigations and countervailing investigations against EU potato starch in 2006 and 2010, so as to effectively curb the unfair import of EU potato starch, and established a relatively healthy, orderly and stable market for the domestic potato starch industry.

At the same time, during the implementation of double countermeasures, the relevant national authorities continue to support and encourage the development of the potato industry. For example: In 2015, the Ministry of Agriculture proposed a staple potato development strategy, identifying potatoes as the fourth staple food after wheat, maize and rice, in order to improve the national dietary structure and open up new ways to ensure national food security; In 2016, the development of potato staple foods was definitely written into the central document, article 7 clearly pointed out that "to establish a big food view, face the entire land resources, all-round, multi-channel development of food resources, to meet the increasingly diversified food consumption needs ... actively promote the development of potato staple foods"; In 2017, the General Office of the State Council issued Opinions on Further Promoting the Development of Agricultural Products

Processing Industry to promote structural reform on the agricultural supply side and promote the transformation and upgrading of agro-processing industry as the main line, with a conversion rate of 68% by 2020.

Under the guidance of the national potato staple food industry development strategy, the potato processing industry is facing good development opportunities, whether it is cultivated area, single-product or potato varieties and planting structure adjustment, have provided excellent raw material supply to the potato starch processing industry, effectively promote the common development of potato cultivation and processing industry, and expand the new elimination of potato seeds and starch.

Market and space.

Since the implementation of double countermeasures, China's demand for potato starch has continued to grow steadily, from 545,000 tons in 2019 to 573,300 tons in 2022, a cumulative increase of 5.19%. Demand for January-June 2023 was 271,300 tons, an increase of 17.50% over the same period last year.

In the market environment of relatively fair competition, in order to meet the further growth of domestic market demand, the domestic industry in the business efficiency has improved at the same time, but also through increased investment, the scale of production has increased, and the industrial competitiveness has been improved. With the gradual expansion of production capacity, the total domestic potato starch production also increased from 439,700 tons in 2019 to 488,200 tons in 2022, a cumulative increase of 11.03%.

Under the joint effect of double countermeasures and the overall stable growth of demand, the domestic industry has obtained further recovery and development, such as production capacity, volume of domestic sales, market share, domestic sales price, domestic sales income, investment, per capita wages, etc., have shown varying degrees of growth or upward trend.

However, the production and operation of similar products in the domestic industry remains unstable and fragile. On the one hand, the number of domestic industrial production enterprises is more, the production capacity is more dispersed, and more distributed in remote poor areas or underdeveloped areas. At the same time, due to the limitations of natural weather, land conditions and other factors, the domestic industry

also has a natural endowment disadvantage in the cultivation and harvesting of potatoes. During the continued implementation of anti-dumping measures, although the domestic industry is constantly committed to improving these unfavourable conditions of competition, it is still significantly under-competitive compared with the EU industry. The EU potato starch industry not only produces large scale, but also has a long history of serious dumping and subsidies of unfair competition. Therefore, the domestic industry's ability to resist risks is relatively weak, and it is susceptible to the influence and interference of other factors such as the dumping of imported products in the EU.

On the other hand, the operating efficiency of the domestic industry during the continued implementation of anti-dumping measures performed very unstable, the domestic industry's pre-tax profit margin continued to struggle near the breakeven line, and the return on investment has always been at a very low level. Since 2022, economic indicators including output, start-up rate, employment, labor productivity and other economic indicators have shown varying degrees of negative performance. In addition, there is a certain correlation between the negative performance of the economic indicators of the domestic industry in the relevant period and the EU application to investigate the product "mass incremental price" behavior, which proves once again that the domestic industry is very sensitive to the changes in the quantity and price of imported products, is vulnerable to the impact and impact of imported products, still need to continue the implementation of anti-dumping measures to maintain normal market order.

Preliminary evidence suggests that the European Union is the world's largest potato starch production region, with strong potato starch production capacity, a large amount of excess capacity and spare capacity. At the same time, the EU also has a strong export capacity, foreign exports are an important channel for the EU to eliminate potato starch overcapacity, and the Chinese market for EU manufacturers has a great attraction, is an important target market for EU manufacturers. In this case, if the anti-dumping measures are terminated, EU manufacturers can release huge spare capacity at any time to expand production, their ability to export potato starch to China will be greatly improved, and the number of exports to China will increase significantly. Moreover, EU potato starch products are likely to continue or again be dumped to the Chinese market in a low-cost, price reduction manner, which will cause price cuts, lowers and suppression of similar domestic products.

Affected by the above, the EU potato starch re-dumping of a large number of low

prices will undoubtedly squeeze the domestic industry's market share, at that time the domestic industry's domestic sales volume of similar products, market share may be reduced or decreased, terminal inventory may increase significantly, domestic prices are likely due to increased competition and a sharp decline, which will lead to a decrease in sales revenue of similar products in the domestic industry, decline in profitability or even a total loss, the net cash flow is reduced. In recent years, the huge funds invested in the domestic industry will not only be able to be effectively recovered, but also will further affect the normal production of similar products, the reduction of production, the decline in the start-up rate will promote the domestic starch potatoes seriously stagnant sales, and then destroy the sustainable development of the entire potato starch industry, forming a vicious circle.

Moreover, as an important link in the potato industry chain, the potato starch industry has its own characteristics, both related to its own industrial interests, but also to national food security, and even involves many problems in the "three farmers". Therefore, when a large number of low-priced imports of dumped products continue or again cause damage to the domestic potato starch industry, the damage is not only the industry itself, but also on the national food security, the fundamental interests of farmers have a serious adverse impact.

Based on the foregoing and other relevant reasons and reasons discussed in the application below, the applicant considers that: If anti-dumping measures are terminated, the dumping of potato starch originating in the EU and exported to China may continue or recur, and the damage to the domestic industry caused by imports of potato starch originating in the EU may continue or recur.

Therefore, in order to safeguard the legitimate rights and interests of the domestic potato starch industry, the applicant on behalf of the domestic potato starch industry requested the Ministry of Commerce to conduct an end-of-term review of the anti-dumping measures of imported potato starch originating in the European Union originating in the European Union and the application of the anti-dumping measures, and to the State Council's Tariff Commission to continue to impose anti-dumping duties on potato starch originating in the EU and exported to China for a period of 5 years.

Manufacturers, exporters and importers of known products applying for investigation

On the basis of reasonably available information and information, the applicant

provides the following list of manufacturers, exporters and importers of products that are known to apply for investigation:

1 - Producers

(1) Name of the company: Coöperatie Koninklijke Avebe U.A.

(Royal Ivebe Co-operative Company)

Company address: P.O. Box 15,9640 AA Veendam, Netherlands

Contact the phone: 31 598 66 91 11

Pass it on. It really is: 31 598 66 43 68

Thenetwork The site: Please contact us at <http://www.avebe.com>

(2) Name of the company: Avebe Kartoffelstärkefabrik Prignitz/Wendland GmbH (Germany potato starch plant)

Company address: Albrecht-Thaer-Straße 1 29439 Luáchow, Germany

Contact the phone: +49 (0) 5841 139122

Pass it on. It really is: +49 (0) 5841 139 105

Thenetwork The site: Please contact us at <https://www.avebe-kpw.de/>

Note to: The German potato starch plant is the 100% owned potato starch plant in Germany by Royal Ivebe Cooperative.

(3) Name of the company: Emsland-Stärke GmbH (Germany company)

Company address: Emslandstraße 58, D-49824 Emlichheim, Germany

Contact the phone: +49 (0) 5943/81-0

Pass it on. It really is: +49 (0) 5943/81-205

Thenetwork The site: Please contact us at <http://www.emsland-group.de>

(4) Name of the company: KMC Kartoffel Melcentralen (Danish company KMC)

Company address: KMC, Herningvej 60, DK-7330 Brande, Denmark

Contact the phone: +45 9642 5555

Pass it on. It really is: +45 9642 5500

Thenetwork The site: Please contact us at <http://www.kmc.dk>

(5) Name of the company: ROQUETTE FRERES (French company Rogate)

Company address: Roquette Frères, DRH/Recrutement cadres
62136 Lestrem, France

Contact the phone: 33 03 21 63 36 00

Pass it on. It really is: 33 03 21 63 38 50

Thenetwork The site: Please contact us at <http://www.roquette.fr>

(6) Name of the company: Chemigate Oy (Finnish company Chemigate)

Company address: Chemigate Oy, Simpsiöntie 682, FI-62100 LAPUA, Finland

Contact the phone: +358 20 721 5555

Pass it on. It really is: +358 20 721 5995

Thenetwork The site: <http://chemigate.fi>

(7) Name of the company: Agrana Group (Agrana, Austria)

Company address: Friedrich-Wilhelm-Raiffeisen-Platz 1, 1020 Wien, Austria

Contact the phone: +43 1 21137-0

Pass it on. It really is: +43 1 21137-12998

Thenetwork The site: <http://www.agrana.com>

(8) Name of the company: AKV Langholt (Danish company AKV Langholt)

Company address: Gravsholtvej 92, DK-9310 Vodskov, Denmark

Contact the phone: +45 96 38 94 20

Pass it on. It really is: +45 98 28 65 03

Thenetwork The site: Please contact us at <http://www.akv-langholt.dk>

(9) Name of the company: PEPEES S.A (Polish company PEPEES)

Company address: Przedsiębiorstwo Przemysłu Spożywczego PEPEES S.A.

Poznańska Street 121, Postal code 18-402

Contact the phone: 086-21-55-801

Pass it on. It really is: 086-21-83-242

Thenetwork The site: <http://www.pepees.pl>

2 - The Exporter

According to the applicant's knowledge, the major producers themselves engaged in export business, that is, the exporter.

3 - The importer

On the basis of reasonably available information and information, the applicant provides the following list of importers known to apply for investigation products:

(1) Name of the company: Shanghai Shifeng International Trade Co., Ltd.

Company address: Building 1 Shanghai Chang and Road 100

Contact the phone: 021-51077717

It's a fax: 021-51077767

(2) Name of the company: Hebei Import and Export Trade Limited

Company address: Shijiazhuang Xinhua District Alliance Road

Contact the phone: 0311-66110600

Pass it on. It really is: 0311-80930561

(3) Name of the company: Guangzhou Master Trading Co., Ltd.

Company address: Tianhe District of Guangzhou City, Guangdong

Contact the phone: 020-87721850

Pass it on. It really is: 020-87721850

(4) Name of the company: Hong Kong Dragon International Trade Development Limited

Company address: South China Sea Avenue, Shenzhen, Guangdong Province

Contact the phone: 0755-86057292

Pass it on. It really is: 0755-86057122

(5) Name of the company: Shandong Hao Jian International Trade Co., Ltd.

Company address: General Lunan, Shandong Jinan City

Contact the phone: 0531-80969969

Pass it on. It really is: 0531-69950877

(6) Name of the company: Tianjin Peak Starch Development Co., Ltd.

Company address: Tianjin Economic and Technological Development Zone, 2nd Street

Contact the phone: 022-25320550

Pass it on. It really is: 022-25320557

(7) Name of the company: Mr. Kang Holdings Limited

Company address: 15th Street Third Street, Tianjin Economic and Technological Development Zone, China

Contact the phone: 022-66868888

Pass it on. It really is: 022-65298080

(8) Name of the company: Chengdu Star Screen Food Limited

Company address: 216 East Street in Jinjiang District, Chengdu, 1 37th Floor 2 A

Contact the phone: 028-85210432

(9) Name of the company: Shanghai Wangwang Food Group Co., Ltd.

Company address: 2nd Floor, 1088 Red Songdong Road, Shanghai

Contact the phone: 021-61151111

(10) Name of the company: Mirani Trading Ltd., Qingdao

Company address: Qingdao Bonded Zone, Beijing Road 49 Tianyi Construction Materials City Business Building, 2 12nd Floor

Contact the phone: 0532-85660009

(11) Name of the company: Hangzhou Prostar Starch Co., Ltd.

Company address: 50 Jincho Street, Lower Sha Street, Hangzhou Economic and Technological Development Zone, Zhejiang Province

Contact the phone: 0571-28869338

(2) Complete description of application survey products, domestic similar products and the comparison between the two

(1) The specific description of the application survey product and the scope of the investigation of the applicant's application

The scope of the application for investigation products is the product applicable to the original anti-dumping measures, and the specific description is the same as the original anti-dumping investigation case and the two anti-dumping measures end review investigation under investigation, as follows:

Name of Chinese: Potato starch, also known as potato original starch, potato refined starch, potato raw powder, potato starch or potato starch.

The English name is: The Potato Starch.

Specific description of: Potato starch is a white powder composed of polyglucose molecules made up of polyglucose molecules processed from potatoes, and its physiochemical indicators are: Whiteness (457nm blue light reflectivity) $\geq 90\%$, moisture $\leq 20\%$, viscosity (4% concentration, 700cmg) $\geq 1100\text{BU}$, protein (dry substance content) $\leq 0.15\%$.

Main uses: The application for investigation of imported products in China is mainly used in the food industry, is the production of emulsifiers, thickeners, stabilizers, stabilizers, excipients and other important raw materials, widely used in expansion food, convenience food, sausage, ham and other meat products, frozen food, sauce, mud, soup food, beverages, sauces, cooking, sugar, water product processing and other industries.

The products applied for investigation are listed as 11081300 in the customs import tax code of the People's Republic of China.

Import tax rate: The MFN tax rate is 15% from 2019 to 2023.

VAT rate: For the period from January 1, 2019 to March 31, 2019, the applicable VAT rate of application for survey products is

16%, adjusted to 13% as of April 1, 2019.

("Annex VI: Import and Export Tax of the People's Republic of China, 2019-2023 Edition)

Conditions of regulation: According to the Ministry of Commerce Announcement No. 8 of 2007, 16 of 2011, Proclamation No. 4 of 2013, Proclamation 72 of 2016, Proclamation No. 4 of 2019 and Announcement No. 4 of 2021, China currently imposes anti-dumping duties of 12.6%-56.7% on potato starch products originating in the European Union and the United Kingdom for five years from February 6, 2019. According to the Ministry of Commerce Announcement No. 54 of 2011, 72 of 2016, Proclamation No. 38 of 2017, Proclamation No. 4 of 2021 and No. 33 of 2023, China currently imposes a countervailing tax of 7.5%-12.4% on potato starch products originating in the European Union for five years from September 16, 2023.

(2) Comparison of application survey products with domestic similar products

According to the final ruling of the original case and the end of the two anti-dumping measures review ruling, imported potato starch products originating in the EU and domestic enterprises to meet the same standard of physical and chemical characteristics of potato starch products are the same, the original material, production process and main production equipment, the same use and mutual replacement, sales channels and customer groups are basically the same, belong to similar products. During the continued implementation of anti-dumping measures, there was no substantial change in imported potato starch products originating in the EU and potato starch products produced by domestic enterprises. The applicant believes that the potato starch products produced by domestic enterprises that meet the same standard of physiochemical indicators are of the same kind as this application survey product. The sameness or similarity between the products and similar products applied for investigation includes, but is not limited to, the following:

The materialization characteristics, quality indicators, appearance, packaging and similarity of domestic similar products

This application survey products and domestic enterprises to achieve the same standard of potato starch products basic requirements are the same, all are: White color, no sand teeth, gentle taste, no odor, no exotic things; Their respective basic physical characteristics and chemical characteristics are not different, and both have high whiteness, high transparency, high viscosity, low paste temperature, high polymerization, low protein, low fat residue, low acidity and good membranability, resistance to condensation and other characteristics.

At the same time, the application for investigation products and domestic enterprises to achieve the same standard of potato starch products are the same or similar in basic physiochemical indicators and health indicators, both in line with China's GB/T 8884/2017 standards for superior grades and first grade products. The appearance is white powder. Packaging form is also basically the same, the packaging methods of domestic enterprises mainly include paper plastic composite bag 25kg / bag, paper valve pocket 25kg / bag, application for investigation product packaging to paper valve pocket 25kg / bag. The two can replace each other.

(2) Applying the same or similarity to domestic similar products in raw materials, production processes, equipment and equipment

The application for investigation products and domestic enterprises to meet the same standards of potato starch products production process is the same, raw materials are potatoes (potatoes), the main process is:Raw material cleaning → shredding → juice water, protein separation → fiber and starch milk separation → starch milk washing, purification → dehydration → drying → finished packaging and other processes.

The application for investigation products and the main production equipment of domestic enterprises to produce potato starch are the same, mainly including weeding, stone removal machines and cleaning machines, grinding mills, deciduous centrifuges or horizontal centrifuges, centrifugal screening groups, refined rotary or static centrifuge sets, vacuum absorbers or scrapers centrifuges, airflow dryers and other equipment. At present, domestic enterprises' potato starch processing technology and major equipment are imported from Europe, but also digest and absorb foreign technology localized equipment, production technology and equipment level compared with the EU manufacturers there is no substantive difference.

3、 Application to investigate the same or similarity to the domestic use of similar products

The application for investigation products and the use of potato starch products produced by domestic enterprises to meet the same standard of physiochemical indicators are used in food, medicine, petrochemicals, papermaking, textile, feed, fermentation, casting, building materials and other industrial fields. In China, both products are mainly used in the food industry, are important raw materials for the production of emulsifiers, thickeners, stabilizers, excipients, etc., widely used in expansion food, convenience food, sausage, ham and other meat products, frozen foods, sauces, mud, soup foods, beverages, sauces, sauces, cooking, sugar, water product processing and other industries.

4、 The same or similarity between the sales channels and customer groups of similar domestic products.

The application for investigation products and domestic enterprises to meet the same standards of potato starch products sales channels are the same, including direct sales and distribution, sales areas are mainly concentrated in China's coastal areas and major central cities; Customer groups are basically the same, and some customers

coincide with each other, such as [downstream customer name], this part of the downstream enterprises both use domestic production of potato starch products that meet the same standard of physiochemical indicators, but also use application survey products.

[The information in parentheses above is part of the downstream customer name of the applicant's relevant member units of similar products, involving the applicant's relevant member units trade secrets, its disclosure on the one hand will adversely affect the interests of the applicant's relevant member units, and on the other hand will harm the interests of these downstream users, so the application is not listed. The contents in parentheses above provide a non-confidential summary of the applicant's word summaries. Oh, yeah. - Yeah.

5、 Conclusion of

In summary, the potato starch produced by domestic enterprises to meet the same standard of physiochemical indicators and the materialization characteristics, quality indicators, appearance, packaging, raw materials and production process, installation equipment, product use, sales channel, sales market area and customer group are not substantively different, with the same or similarity, which can be replaced with each other. Therefore, both are of the same type of product.

III. Basic Situation of Applications for Examination of Products to China

(1) Import of products under investigation during the investigation of the original case

According to the final ruling of the original trial: During the original anti-dumping industry damage investigation period, in 2002, 2003, 2004 and 2005, the import volume of EU potato starch was 19,800 tons, 24,800 tons, 18,900 tons and 74,800 tons, respectively, with an average annual increase rate of 56%. At the end of the survey period, EU imports showed a rapid growth trend, up 295% from the previous year, higher than the total imports of products surveyed in the first three years of the survey period.

In addition, in 2002, 2003, 2004 and 2005, the EU imported potato starch accounted for a market share of 26.54 per cent, 28.71 per cent, 17.63 per cent and 39.01%, an increase of 2.17 percentage points in 2003, a decrease of 11.08 percentage points from 2003 and 21.38 percentage points in 2005.

According to the final ruling of the original trial: In 2002, 2003, 2004 and 2005, EU potato starch imports were USD 397.89 per ton, \$383.69/ton, \$465.6 per ton and \$390.92/tonne, respectively. A decrease

of 3.57 per cent in 2003 compared to 2002, 21.35 per cent in 2004 and 16.04 per cent in 2005 compared to 2004. Under the impact of low-priced dumping of EU potatoes, the difference between the sales price of similar products in the domestic industry and the unit sales cost per unit of gross profit decreased year by year, and the EU potato starch products on the domestic sales price of similar products had a significant inhibition.

(2) Imports of products under investigation during the first anti-dumping period end review investigation

In accordance with the decision of the final review of the first anti-dumping period: During the survey period, the number of imports of products under investigation generally showed an upward trend. Between 2007 and 2011, imports of products surveyed were 7357.5 tons, 8745.01 tons, 31597.1 tons, 139923.4 tons and 139923.4 tons, respectively, up 18.86% in 2008 compared to 2007, up ±% in 2009, minus percent in 2010 and 84.87 percent in 2011 compared to 2010, down 84.87% from 2010, compared to 2010.

In addition, the overall upward trend of products in the domestic market share was 2.44%, 2.8%, 9.78%, 41.47% and 5.69%, respectively. In 2008, an increase of 0.36 percentage points over 2007, 6.98 percentage points in 2009 and 31.69 percentage points in 2010 compared to 2009, and 35.78 percentage points less in 2011 than in 2010, but 3.25 percentage points more than 2007.

During the investigation period, although the dumping of the products under investigation on the domestic market was somewhat contained, the import prices of the products under investigation fell sharply in 2009 and 2010. From 2007 to 2011, the price of RMB after importing imported products originating in the EU was 6098.5 yuan/ton, 6106.29 yuan / ton, 3637.73 yuan/ton, 3519.74 yuan/ton and 3519.74 yuan/tonne.

(3) Import of products under investigation during the second anti-dumping period end review investigation

According to the decision of the end of the second anti-dumping period review: From 2013 to the first half of 2017, the volume of dumped imports was 30,100 tons, 26,700 tons, 57,200 tons, 34,300 tons and 34,300 tons, respectively. From 2013 to the first half of 2017, dumped imports accounted for 8.94%, 7.45%, 14.31%, 9.20% and 18.42% respectively. This table shows that after the implementation of anti-dumping measures, the volume of dumped imports showed a volatile growth trend, and the total amount of imports was stable at 3 to 50,000 tons, and the share of the Chinese market was also generally stable at about 10%.

In 2013, 2014, 2015, 2016 and the first half of 2017, the weighted average price of dumped imported products was \$785.27/ton, \$879.85/ton, \$701.12/ton, \$754.27/ton, \$754.27/ton. The RMB import price adjusted according to the exchange rate, import tariffs and the highest countervailing tax is 6289 yuan / ton, 6987 yuan / ton, 5644 yuan / ton, 6474 yuan/ton and 6423 yuan / ton, respectively. During the investigation

period, the price of dumped imported products was fluctuating, and the general trend was up and down; The average annual price change from 2013 to 2017 was 11.1%, -19.23%, 14.72% and -0.8%, respectively.

(4) Application for the export of investigation products to China during the continued implementation of anti-dumping measures

The number of imports, the amount of imports and the import price of the products applied for investigation

Statistical table on imports of products applied for survey

The Unit: Tons, United States dollars, United States dollars/tonnes

During the period	Country (area)	Number of imports	Amount of imports	Prices of imports
2019in	China's total	30,930	31,444,477	1,017
	The European Union	27,196	27,532,453	1,012
In2020	China's total	44,597	37,393,245	838
	The European Union	37,454	31,290,639	835
In2021	China's total	93,896	66,037,146	703
	The European Union	78,285	57,675,463	737
In2022	China's total	34,575	30,053,088	869
	The European Union	30,755	27,800,337	904
January-June2022	China's total	15,345	12,031,774	784
	The European Union	11,670	10,152,574	870
January-June2023	China's total	10,375	11,262,454	1,086
	The European Union	10,234	11,078,414	1,082

Note to: The data are derived from "Annex VII: Statistics on imports of potato starch from the General Administration of Customs of the People's Republic of China.

Changes in the number of imports of products applied for investigation

2.1 Changes in Absolute Imports of Applied Products

Statistical table on the number of imports applied for survey products

The Unit:Tons of

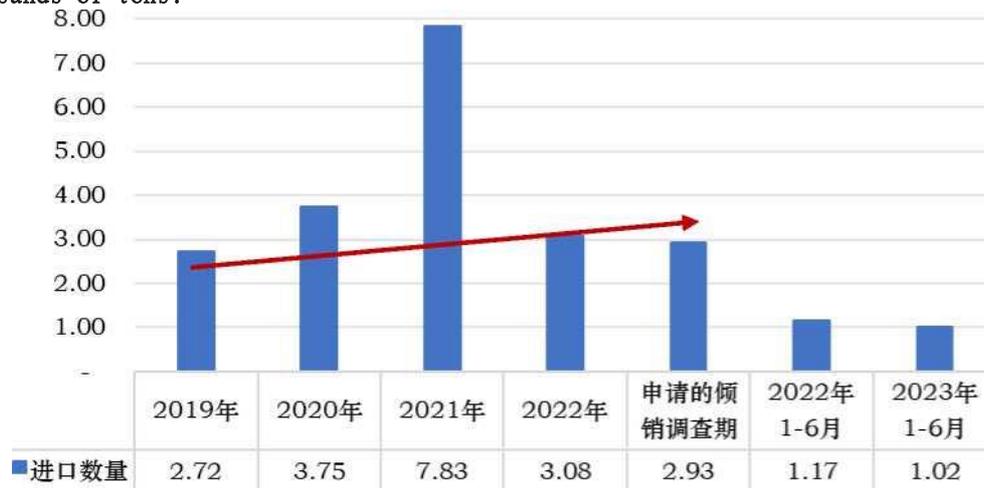
During the period	Country (area)	Number of imports	Proportion of quantity	Proportion of change in quantity
2019in	China's total	30,930	100.00%	-
	The European Union	27,196	87.93%	-
In2020	China's total	44,597	100.00%	44.18%
	The European Union	37,454	83.98%	37.72%
In2021	China's total	93,896	100.00%	110.55%
	The European Union	78,285	83.37%	109.02%
In2022	China's total	34,575	100.00%	(63.18%)
	The European Union	30,755	88.95%	60.71%
January-June2022	China's total	15,345	100.00%	-
	The European Union	11,670	76.05%	-
January-June2023	China's total	10,375	100.00%	-32.39%
	The European Union	10,234	98.64%	-12.31%

Note to:(1) Data from "Annex VII:Statistics on imports of potato starch from the General Administration of Customs of the People's Republic of China;

(2) The proportion is the number of EU applications to investigate exports to China as a proportion of total Chinese imports.

Changes in the number of imports of EU applications for survey products

The Unit:Thousands of tons.



During the continued implementation of anti-dumping measures, the EU applied to investigate the amount of exports of products to China rose and fell, and the overall trend was rising. From 2019 to 2021, the number of exports increased from 27,200 tons to 78,300 tons, a cumulative increase of 187.86%. In 2022 and January-June 2023, the export volume was 30,800 tons and 10,200 tons, respectively, down 60.71% and 12.31% from the same period last year. The volume of imports for the dumping investigation

period (July 2022 to June 2023) was 29,300 tons, an increase of 7.81% compared with the total in 2019.

During the continued implementation of anti-dumping measures, the EU remained the main source of China's potato starch imports, and the EU applied to investigate the amount of imports of products accounted for more than 80% of China's total imports. These facts show that the Chinese market is an extremely important and unforgettable target market for EU potato starch manufacturers.

2.2 Changes in the number of products applied for investigation relative to imports

2.2.1 Demand for similar products in China

Changes in demand for similar products in China

The Unit: Thousands of tons.

During the period	China's Demand	Magnitude of change in demand
2019in	54.50	-
In2020	61.93	13.63%
In2021	66.09	6.72%
In2022	57.33	13.25%
January-June2022	23.09	-
January-June2023	27.13	17.50%

Note to: China's demand data can be found in Annex V: A description of the supply and demand for potato starch in China and the European Union.



From the above chart, it can be seen that during the period when anti-dumping measures continue to be implemented, China's potato starch demand has generally increased. From 2019 to 2022, China's potato starch demand is 545,000 tons, 619,300 tons, 660,900 tons and 573,300 tons respectively, with a cumulative increase of 5.19% from 2019 to 2022. Demand for January-June 2023 was 271,300 tons, an increase of 17.50% over the same period last year.

2.2.2 Changes in the relative import volume of products applied for investigation

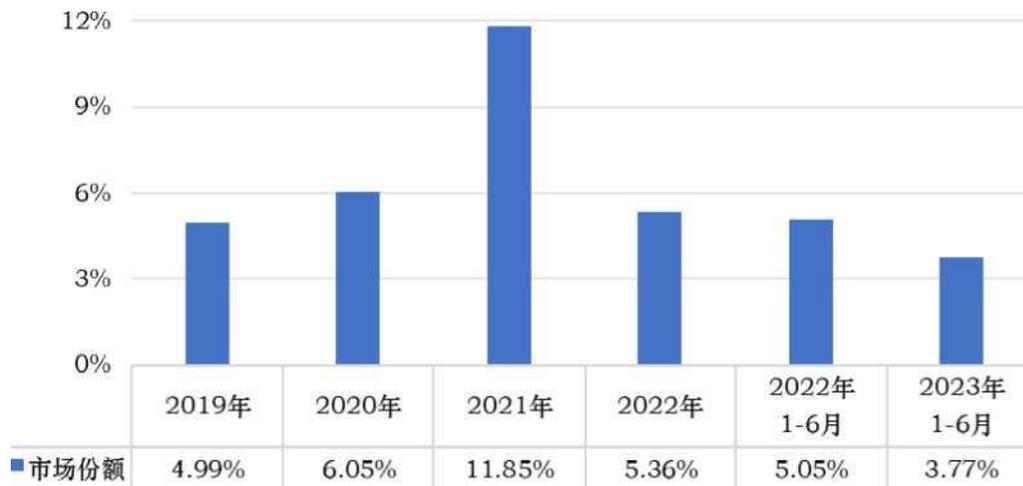
Changes in China's market share of application for survey products imports

The Unit: Thousands of tons.

During the period	Number of imported products	China's Demand	Market share of applications for	Percentage increase in
2019in	2.72	54.50	4.99%	-
In2020	3.75	61.93	6.05%	1.06percentage
In2021	7.83	66.09	11.85%	5.80percentage
In2022	3.08	57.33	5.36%	6.48percentage
January-June2022	1.17	23.09	5.05%	-
January-June2023	1.02	<u>27.13</u>	3.77%	1.28percentage

Note to: Market share = number of imports applied for survey products / Chinese demand.

Changes in market share of EU applications for survey products



As can be seen from the above chart: During the continued implementation of anti-dumping measures, the EU applied for investigation products to occupy China's market share trend. The market share in 2019, 2020 and 2021 was 4.99%, 6.05% and 11.85%, respectively, with a cumulative increase of 6.86 percentage points. The market share in 2022 and January-June 2023 was 5.36% and 3.77%, respectively, down 6.48 percentage points and 1.28 percentage points from the previous year.

Application to investigate the changes in import prices of products

Application to investigate changes in import prices of products

The Unit: United States dollars/tonnes

During the period	Number of imports	Amount of imports	Prices of imports	Extent of change in import prices
2019in	27,196	27,532,453	1,012	-
In2020	37,454	31,290,639	835	17.48%
In2021	78,285	57,675,463	737	-11.82%
In2022	30,755	27,800,337	904	22.69%
January-June2022	11,670	10,152,574	870	-
January-June2023	10,234	11,078,414	1,082	24.43%

Note to: (1) The source of import data can be found in Annex VII: Statistics on imports of potato starch from the General Administration of Customs of the People's Republic of China;

(2) The The import price = the amount of import/import.



During the period of continued implementation of anti-dumping measures, the EU applied to investigate the import price of products rose first, in 2020 and 2021, compared with the previous year, export prices fell 17.48% and 11.82%, 2022 and the first half of 2023 compared with the same period last year, export prices increased by 22.69% and 24.43% respectively. The applied dumping investigation period (July 2022 to June 2023) import price was 980 yuan/tonne, a decrease of 3.22% compared to 2019.

Combined with the changes in data on both the quantity of imports and the import price, the EU applies to investigate the change in the quantity of imports and the change in the import price is clearly related, maintaining a reverse-change relationship, that is, "import prices rise and the number of imports decreases; The

import price decreases and the number of imports rises. During the continued implementation of anti-dumping measures, even if subject to anti-dumping measures, EU manufacturers tried to expand and maintain exports to the Chinese market through price reductions or low prices.

Potential for continued or recurrence of dumping

(一) Dumping of imported potato starch products originating in the EU during the implementation of anti-dumping measures

In the original anti-dumping case, the Ministry of Commerce finally ruled that the EU potato starch was dumped.

In the mid-examination case of anti-dumping measures in 2010, the Ministry of Commerce ruled that the dumping margin of other EU companies other than Avibe (dumping investigation period from April 1, 2009 to March 31, 2011) was much higher than that of the original dumping investigation period (January 1, 2005 to December 31, 2005), and that Ivebe's imported products were still dumped.

In two cases at the end of the anti-dumping period, the Ministry of Commerce ruled that EU potato starch continued to be dumped.

Since China's anti-dumping measures on imports of potato starch originating in the EU on February 5, 2007, EU producers and or exporters have not initiated any new exporter's review and mid-term review of anti-dumping measures, which also explains in a certain course that it has no objection to the need to continue to implement anti-dumping measures in accordance with the original form and level.

(二) During the continued implementation of anti-dumping measures, imported potato starch products originating in the EU continued to be dumped.

According to preliminary evidence available to the applicant, between July 2022 and June 2023, potato starch originating in the EU and exported to China continued to be dumped. Below, the applicant based on the information and data currently available, preliminary estimate of the dumping margin of potato starch originating in the EU and exported to China during the above period.

Method of calculating dumping margins

(1) The applicant cannot know in detail the actual transaction price of EU potato starch production

enterprises exported to China from July 2022 to June 2023, and the weighted average price calculated by the applicant based on customs statistics of the People's Republic of China is used as a basis for calculating its export price.

(2) By publicly available channels, the applicant obtained the domestic sale price of EU potato starch in the German market during the same period. Since Germany is the main producing region and market for potato starch in the European Union, and there is no evidence that the sale price is carried out in an irregular channel (e.g. below-cost sales), the applicant provisionally uses the sale price as the EU potato starch domestic price, and as the basis for the normal value before adjustment.

(3) Based on the above export price and normal value, the applicant will make appropriate adjustments and estimate the dumping margin of imported potato starch originating in the EU at the level of the factory price.

(4) Applicant based on further information and information collection, calculation of normal value and export price and dumping margin

Reserve the right to make further changes and claims.

Export Prices of Applications for Survey Products

(1) Export Prices Before Adjustment

The Unit: Tons of tons; The United States dollar; United States dollars/tonnes

The Period	Number of exports	Amount of export	Export Price (CIF)
July 2022 to June 2023	29,319	28,726,177.00	979.79

Note to: (1) Data from "Annex VII: Statistics on imports of potato starch from the General Administration of Customs of the People's Republic of China; (2) Export price = export amount / export quantity.

(2) Price Adjustment

According to the law, with regard to price adjustment and price comparison, the applicant should make appropriate adjustments to the normal value, export price in sales articles, terms, taxes, trade links, quantity, physical characteristics, etc. In comparison of normal value and export prices, as far as possible, on the same trade link, the same time sales, before the factory level.

For the purpose of estimating the dumping margin, the applicant makes the

following adjustments:

A. Appropriate adjustment of import duties and value-added tax

Since the applicant understands that the price is calculated according to the quantity and amount of customs statistics of the People's Republic of China, is a weighted average CIF export price, does not include import duties, value added tax, etc., this adjustment shall not apply.

B. Appropriate adjustments to terms of sale and trade links

Since the applicant understands that the export price is calculated according to the quantity and amount of customs statistics of the People's Republic of China, the weighted average CIF export price, in order to compare the normal value at the level of the factory price, should be deducted on the basis of the above prices from the EU to China, including international freight, international insurance premiums, port charges, transport charges within the European Union region, premiums, packaging fees, discounts, commissions, credit costs, storage, commercial inspection fees and other charges. Overall, the cost of the above link can be roughly divided into the cost of the EU to China overseas link and the cost of the link within the EU area.

Regarding the cost of the overseas link, according to the applicant's understanding, the EU export of potato starch to China generally uses container containers, transported through the ocean, each 20 feet container container can transport about 16 tons of potato starch. According to preliminary evidence, the EU's sea freight rate for 20-foot containers to China is \$4,725 per cabinet and \$295.31 per tonne of sea freight. In addition, the insurance rate is 0.45 per cent. According to international practice, premiums are calculated on the basis of 110% of the CIF value of the goods, so the premium is equal to $CIF \times 110\% \times 0.45$ per cent. With regard to other costs, the deduction is suspended on the basis of the principle of soundness.

With regard to the cost of the domestic link, the applicant is temporarily unable to obtain the actual internal costs of the application investigation product in the EU. In order to make reasonable adjustments to the costs of the domestic link, the applicant temporarily adjusted the export price on the basis of the internal costs of the EU export trade learned from the World Bank Group. According to the report of the World Bank, the domestic costs of EU exported 20-foot cabinet containers total 990 U.S. dollars, calculated according to the average loading of 16 tons of products per cabinet, and the cost of the domestic link per ton of investigation products is about 61.88 US dollars.

As a result, this adjustment is as follows:

The Unit: United States dollars/tonnes

The Period	Export Price (CIF)	Subtract from:Sea freight/ton	Subtract from:Insurance premiums/tons	Subtract from:Internal	Prices of exports (After
July2022toJune2023	979.79	295.31	4.85	61.88	617.75

Note to:(1) Sources of shipping and insurance premiums can be found in Annex VIII:Information note on shipping and insurance premiums";

(2) Sources of costs for the domestic link can be found in "Annex IX:Presentation by the World Bank Group on the costs of EU transportation";

(3) Shipping freight / ton = US\$4725/16 tons = 295.31 US dollars/tonne;Insurance premium/ton = US\$979.79 / ton*110%*0.45% = 4.85 US dollars/tonne

United States dollars/tonne;Domestic link cost / ton = 990 US\$/16 tons = \$61.88 / ton.

C.Adjustments in other aspects such as volume of sales and physical characteristics

This adjustment should not be considered at this time, as the volume of EU sales in its home market and export sales to China is representative and comparable, and the materialization characteristics are essentially the same.

(3) Adjusted export prices

After the above adjustment, the adjusted EU potato starch export price is:

The Unit:United States dollars/tonnes

The Period	Export prices (adjusted)
July2022toJune2023	617.75

The Normal Value of Applying Survey Products

(1) Normal Value Before Adjustment

Based on the prima facie evidence obtained by the applicant, the applicant understands the average selling price of potato starch in the EU's local cities in the third quarter of 2022 to the second quarter of 2023, as shown below:

The Unit:United States dollars/tonnes

The Period	Normal value prior to adjustment
3quarters of2022	969.05
4quarters of2022	1,147.50
1stquarterof2023	1,200.00
2nd quarterof2023	1,070.30

The Average Calculation	1,096.71
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Note to: The EU potato starch price data sources can be found in Annex X: EU potato starch local sales price.

(2) Price Adjustment

According to the law, with regard to price adjustment and price comparison, the applicant should make appropriate adjustments to the normal value, export price in sales articles, terms, taxes, trade links, quantity, physical characteristics, etc. In comparison of normal value and export prices, as far as possible, on the same trade link, the same time sales, before the factory level.

For the purpose of estimating the dumping margin, the applicant makes the following adjustments:

A. Adjustment of terms of sale and trade

Since the applicant is aware of the above EU sales price is not the factory price, including the cost of links within the EU. In order to compare the price level of the factory, the applicant adjusts the cost of links within the EU.

Regarding the terms of sale and the cost of the trade link, the applicant is temporarily unable to obtain the actual domestic costs of potato starch in the EU, and the applicant temporarily adjusts the costs of the relevant links in the EU as reported by the World Bank Group above.

As a result, this adjustment is as follows:

The Unit: United States dollars/tonnes			
The Period	Normal value prior to adjustment	Subtract from: Costs of internal links	Adjusted normal value
July 2022 to June 2023	<u>1,096.71</u>	<u>61.88</u>	1,034.83

Note to: For sources of domestic transportation costs, please refer to Annex IX: The World Bank Group's presentation on EU trade costs.

B. Adjustments in other aspects such as volume of sales and physical characteristics

This adjustment should not be taken into account at this time, as the volume of EU sales in its home market and export sales to China is representative and comparable, and in terms of materialization characteristics is basically the same.

(3) Adjusted normal value

After the above adjustments, the normal value of the adjusted EU potato starch is:

The Unit:United States dollars/tonnes	
The Period	Adjusted normal value
July2022toJune2023	1,034.83

Estimated dumping margin

The Unit:United States dollars/tonnes	
It's the item. It's an eye.	July2022toJune2023
Export Price (CIF)	979.79
Export prices (adjusted)	617.75
Normal value (adjusted)	1,034.83
Absolute amount of dumping	417.08
Margin of dumping	42.57%

Note to:(1) Dumping absolute = normal value (adjusted) - export price (adjusted);

(2) Dumping margin = absolute dumping / export price (CIF).

(三) If anti-dumping measures are terminated, dumping is likely to continue or recur.

1, in the case of anti-dumping measures, the EU potato starch still has dumping to China's exports, once the anti-dumping dosing is terminated, the EU's dumping behavior is likely to continue or recur, or even more serious.

As mentioned above, in the original case of anti-dumping, the mid-term review case and two cases of the end of the anti-dumping period review, the investigating authority found that the EU applied to investigate the product dumping behavior. Moreover, preliminary evidence suggests that between July 2022 and June 2023, the EU applied for investigation of the product continued to be dumped and the dumping margin was as high as 42.57%.

These facts show that dumping is a consistent strategy for EU manufacturers to export a large number of products to China for investigation. Moreover, in the light of the trend of the total "incremental price" during the implementation of anti-dumping measures continued to implement anti-dumping measures, the dumping of EU potato starch in the Chinese market is likely to continue or recur, or even more serious, once the anti-dumping measures are finally stopped.

China is the world's second largest potato starch consumer market after the EU, which is very attractive to EU manufacturers.

Table of domestic potato starch demand

The Unit: Thousands of tons.

The Period	2019in	In2020	In2021	In2022	January-June2022	January-June2023
Amount of demand	54.50	61.93	66.09	57.33	23.09	27.13
Magnitude of change	-	13.63%	6.72%	13.25%	-	17.50%

Note to: For data sources, see "Annex V: A description of the supply and demand for potato starch in China and the European Union.

China is the world's second largest potato starch consumer market, and demand for potato starch has maintained an overall growth trend since 2019. From 2019 to 2022, China's potato starch demand is 545,000 tons, 619,300 tons, 660,900 tons and 573,300 tons, 2022 compared with the cumulative growth of 5.19% in 2019. Demand for January-June 2023 was 271,300 tons, a significant increase of 17.50% over the same period last year. Moreover, China has always put the potato starch industry as a focus to encourage the development of the agricultural industry, in view of the current processing rate of potato starch and the consumption level of residents still have great potential for growth, it is expected that the demand for potato starch will continue to maintain a steady growth in the next few years.

As the world's largest potato starch production and export region, under the back of the market demand and severe oversupply, demand overall growth and huge potential of the Chinese market is undoubtedly very attractive, the Chinese market will continue to become a must for EU potato starch manufacturers.

The production, consumption and export of EU potato starch indicate that if anti-dumping measures are terminated, its dumping against China is likely to continue or recur.

3.1 EU Potato Starch Production Capacity

Changes in EU Potato Starch Production

The Unit: Thousands of tons.

The Period	2019in	In2020	In2021	In2022	Expected in2023
The productive capacity	194.88	194.88	194.88	194.88	194.88
Amount of production	128.89	151.24	163.50	157.50	147.96
Rate of work	66%	78%	84%	81%	76%

Unused production capacity	65.99	43.64	31.38	37.38	46.92
Spare capacity as a proportion of	34%	22% of	16% of	19%	24%
China's Demand	54.50	61.93	66.09	57.33	60.00
EU spare capacity as a proportion of	121%	70% of	47%	65% of	78%

Note to:(1) Sources of data can be found in "Annex V:A description of the supply and demand for potato starch in China and the EU";

(2) Start rate = output / production capacity, spare capacity = production capacity - production.

The European Union is the world's largest potato starch producing region with a strong capacity of 1,948,800 tonnes. From 2019 to 2023, the average production of potato starch in the EU was 1,498,200 tons, with an average start rate of 77%, the average idle capacity was 450,600 tons, and the average proportion of spare capacity was as high as 23%.

It is expected that the EU's spare capacity will not be substantially reduced in the future, and if the EU fully releases its larger spare capacity, its export capacity will be greatly enhanced. From 2019 to 2023, the average annual demand in China is 599,700 tons, the European Union's spare capacity is equivalent to 75% of China's demand, and its spare capacity still poses a great threat to the volume of the Chinese market.

Therefore, if the anti-dumping measures applied to EU potato starch are terminated, EU manufacturers can release huge spare capacity at any time to expand production and increase production, and their dumping behavior in the Chinese market is likely to be more serious.

3.2 Export capacity of EU potato starch

Changes in the export capacity of EU potato starch

The Unit: Thousands of tons.

The Period	2019in	In2020	In2021	In2022	Expected in2023
The productive capacity	194.88	194.88	194.88	194.88	194.88
Amount of demand	100.51	118.73	117.16	121.82	110.16
Reliance on export capacity	94.37	76.15	77.72	73.06	84.72
Production capacity dependent	48%	39%	40%	37%	43%
China's Demand	54.50	61.93	66.09	57.33	60.00
EU excess capacity as a proportion of	121%	123%	118%	127%	141%

Note to:(1) Demand data sources can be found in Annex V:A description of the supply and demand for potato starch in China

and the EU";

(2) The production capacity to be exported = capacity - demand.

As mentioned above, the EU is the world's largest potato starch production region, but compared to demand, the EU potato starch market is clearly oversupplied, with an average excess capacity of 812,000 tons from 2019 to 2023, accounting for 42% of total capacity. That is, this excess capacity depends on export markets for digestion, so the EU has a strong potato starch export capacity.

The EU's excess capacity is not expected to be substantially reduced in the future, and if the EU fully releases its large excess capacity, its export capacity will be greatly enhanced. China's average demand from 2019 to 2023 is 599,700 tons, and the EU's excess capacity is equivalent to 135% of China's demand, and its excess capacity still poses a great threat to the Chinese market volume.

As mentioned above, China is the world's second largest potato starch consumer market and steady growth in demand, which is a great attraction for EU manufacturers, is the EU manufacturers to seize the market and digest excess capacity is an important target market. Once the anti-dumping measures are finally stopped, the EU's huge excess capacity will be fully released, its potato starch export capacity to China will be greatly enhanced, and dumping on the Chinese market is likely to be more serious.

3.3 The dependence of EU potato starch on foreign markets

Export of EU potato starch products

The Unit: Thousands of tons.

The Period	In between.	2019in	In2020	In2021	In2022
Total EU potato starch exports		29.28	33.36	47.15	36.73
Total EU Potato Starch Production		128.89	151.24	163.50	157.50
Total exports as a proportion of total		23%	22% of	29%	23%
EU Exports to China		2.72	3.75	7.83	3.08
China's exports as a proportion of total exports		9% of	11% of	17% of	8% of

Note to: (1) Total EU potato starch exports can be found in Annex XII: EU potato starch export statistics";

(2) EU exports to China can be found in Annex VII: Statistics on imports of potato starch from the General Administration of Customs of the People's Republic of China.

The EU is the world's largest potato starch export market. It can be seen from the above table data that the EU potato starch has a strong export capacity, and foreign exports are an important channel for digesting its potato starch overcapacity and spare capacity. The number of EU potato starch exports increased from 292,800 tons in 2019 to 367,300 tons in 2022, and foreign exports accounted for an average annual

proportion of total production as high as 24%.

China is an extremely important and unforgettable target market for EU potato starch manufacturers. Even subject to countervailing and anti-dumping measures, the Chinese market still accounts for a significant share of the EU's total annual exports. Moreover, EU manufacturers have long sought to re-increase their exports to the Chinese market, with exports to China increasing significantly for two consecutive years in 2020 and 2021, up 37.72% and 109.02% respectively from the previous year. If anti-dumping measures are terminated, EU manufacturers are likely to expand production, transfer their excess and spare capacity to the Chinese market more, and dumping on the Chinese market is likely to be more serious.

3.4 EU potato starch exports to the Chinese market

EU potato starch exports to China

The Unit: Tons of tons; United States dollars/tonnes

The Period	2019in	In2020	In2021	In2022	In2022 January - June	In2023 January - June
Number of Exports to China	27,196	37,454	78,285	30,755	11,670	10,234
Magnitude of change in quantity	-	37.72%	109.02%	60.71%	-	-12.31%
Export Prices to China	1,012	835	737	904	870	1,082
Magnitude of price change	-	17.48%	-11.82%	22.69%	-	24.43%

Note to: For quantitative sources, see "Annex VII: Statistics on imports of potato starch from the General Administration of Customs of the People's Republic of China.

During the continued implementation of anti-dumping measures, the EU applied to investigate the amount of exports of products to China rose and fell, and the overall trend was rising. From 2019 to 2021, the number of exports increased from 27,200 tons to 78,300 tons, a cumulative increase of 187.86%. In 2022 and January-June 2023, the export volume was 30,800 tons and 10,200 tons, respectively, down 60.71% and 12.31% from the same period last year. The volume of imports for the dumping investigation period (July 2022 to June 2023) was 29,300 tons, an increase of 7.81% compared with the total in 2019.

There is a clear correlation between the changes in the number of exports of EU applications for investigation and changes in export prices, that is, "export prices rise and the volume of exports decreases; The price of exports has decreased and the number of exports increased. You can see from the above table data: In 2020 and 2021, export prices fell 17.48% and 11.82 percent, respectively, compared to the previous year, and the number of exports increased by 37.72% and 109.02%, respectively. In 2022 and the first half of 2023, export prices rose by 22.69% and 24.43%, respectively, and the number of exports

decreased by 60.71% and 12.31% respectively. From 2019 to the applied dumping investigation period (July 2022-June 2023), export prices fell by 3.22% overall and the number of exports increased by 7.81%. These facts show that the EU's application to investigate products is not enough to maintain market share in China by low price, price reduction, but EU manufacturers are unwilling to give up the Chinese market, and try to take a low price, price reduction method to recapture the Chinese market.

Therefore, in the case of double countermeasures, the EU applies to investigate products and can further increase exports to the Chinese market through price reduction or low price, if the anti-dumping measures are terminated, the price advantage of the EU application for investigation products will be more obvious, can reduce the price space will be further enlarged, further increase the possibility of EU manufacturers dumping against China.

3.5 Low-priced exports of EU potato starch to third countries (regions)

During the dumping investigation in this case, the normal value of EU potato starch was \$1,034.83 per ton. According to the export data of EU potato starch obtained by the applicant, without taking into account adjustment factors, EU potato starch producers and exporters to 48 countries (regions) other than China, export potato starch at a large lower price than normal value. During the application for dumping investigation, the total number of EU potato starch exports to other countries (regions) other than China was 254,148 tons, accounting for 73% of total EU potato starch exports to third countries (regions) during the same period, indicating that the demand for low-priced dumping exports seeking overseas markets is very strong. If anti-dumping measures are terminated, the dumping of EU potato starch on the Chinese market may continue or recur.

(Note: For data sources, please refer to Annex XII: EU potato starch export statistics)

3.6 The EU has a competitive advantage in sales to the Chinese market, increasing its potential for dumping against China.

Due to the long-term operation and sales in the Chinese market, EU manufacturers are very familiar with the Chinese market, sales channels in the Chinese market are still relatively sound, and China's main downstream customers still maintain long-term cooperative relations, can be developed and expanded at any time. For example, domestic downstream manufacturers, including downstream customer names, have been the main

downstream users of EU potato starch.

[The information in parentheses above is part of the downstream customer name of the applicant's relevant member units of similar products, involving the applicant's relevant member units trade secrets, its disclosure on the one hand will adversely affect the interests of the applicant's relevant member units, and on the other hand will harm the interests of these downstream users, so the application is not listed. The contents in parentheses above provide a non-confidential summary of the applicant's word summaries. Oh, yeah. - Yeah.

In fact, during the continued implementation of anti-dumping measures, EU potato starch manufacturers have also been making full use of these convenience strips, and continue to seize China's market share at low prices and lower prices. The fact that the EU has applied to investigate the overall growth in imports of products and is further evidenced by the fact that there has been a significant rebound in 2020 and 2021.

It can be seen that if anti-dumping measures are terminated, EU potato starch manufacturers are likely to use their familiar sales channels and customer base to rapidly expand their exports to China and increase their potential for continued dumping.

(4) Conclusions: If anti-dumping measures are terminated, EU dumping against China may continue or recur.

Synthesizing the above analysis shows that:

- 1、 There is a history of large and low-priced dumping of EU potato starch exports to China during the investigation of relevant anti-dumping cases; Since the implementation of anti-dumping measures, EU manufacturers have not filed a request for overdue mid-term review of anti-dumping measures, and there are still obvious dumping behaviors during the continued implementation of anti-dumping measures. These facts indicate that if anti-dumping measures are terminated, dumping by the EU may continue or recur, or even worse;
- 2、 The Chinese market is the world's largest potato starch consumer market outside the European Union, and compared with the European Union's serious supply of market conditions, China's potato starch market potential and steady growth in demand, has great attraction for EU manufacturers;

3、 The European Union is the largest producer of potato starch in the world, with strong potato starch production capacity. However, the EU potato starch market is severely oversupplied, and there is a lot of excess capacity and spare capacity. In this case, EU manufacturers can release huge spare capacity at any time to expand production. From 2019 to 2023, EU potato starch idle capacity is 75% of China's demand and excess capacity is 1335% of China's demand, increasing its potential for continued dumping against China.

4、 The European Union is the world's largest potato starch export region with a strong export capacity, and foreign exports are digested.

Important channels for potato starch overcapacity and spare capacity, more than 40% of the excess capacity depends on export markets for digestion. Despite the constraints of anti-dumping measures, EU potato starch manufacturers have always been reluctant to give up on the Chinese market, and can still be dumped or reduced during the continued implementation of anti-dumping measures to maintain or increase exports to the Chinese market. If the anti-dumping measures are terminated, the EU's spare capacity is much larger than the total production of similar products in the EU, it is likely that EU manufacturers will continue to transfer their excess capacity to the Chinese market by dumping;

5、 During the application for dumping investigation, the EU potato starch also has a very high-cost export to other countries and regions other than China, indicating that the demand for low-priced dumping exports seeking overseas markets is very strong. If anti-dumping measures are terminated, the dumping of EU potato starch in the Chinese market may continue or recur;

6、 EU potato starch manufacturers are already very familiar with the Chinese market, its channels and sales channels in the Chinese market are still relatively sound, can be developed and expanded at any time. In the case of anti-dumping measures, the volume of its exports to China is still showing an increasing trend. Once anti-dumping measures are terminated, EU potato starch manufacturers are likely to use their familiar sales channels and customer base to rapidly expand their exports to China, increasing their potential for continued dumping.

In view of the above circumstances, the applicant believes that if the anti-dumping measures are terminated, the dumping of the EU application for investigation products to China is likely to continue or recur.

Possibility of continued or recurrence of damage

(1) The situation of the domestic industry

Damage to the domestic industry during the original trial investigation period

According to the final decision of the original anti-dumping trial: During the original investigation period, the domestic potato starch market demand is strong, although China's potato starch industry production capacity and output are growing trend, but to the later part of the survey period growth significantly slowed, 2005 domestic industrial production capacity and output growth is much lower than the domestic potato starch market demand growth rate. In the same period, the number of EU potato starch products increased by 295%. The starting rate of the domestic industry is showing a clear downward trend. During the survey period, although the sales price of the domestic industry increased, due to the price of imported products in the EU, it has never reached a reasonable price level, resulting in the domestic industry always in the dilemma of loss, 2005 is the worst year of loss during the survey period. At the same time, even annual losses have led to the domestic industry investment return always negative. Sales volume, sales revenue, market share and net cash flow all fell sharply after the survey period, of which sales decreased by 24.4% from the same period last year, sales revenue fell 19.86% from the same period last year, the market share fell 37 percentage points from the same period last year, net cash flow fell 306%, and from net inflow to net outflow, domestic production and operation deteriorated. The above situation shows that the domestic industry has suffered substantial damage.

Recovery of the domestic industry during the final review of the first anti-dumping measures

According to the final review of the first anti-dumping period: During the survey period, domestic potato starch market demand continued to grow, up 23.19 percent in 2011 from 2007. The domestic industry has built and expanded a number of production devices, domestic industrial production capacity has been significantly improved, domestic industry output, sales income, sales price, pre-tax profit, employment, per capita wages and other economic indicators have improved to varying degrees. Sales rose from 110567 tons in 2007 to 120713 tons in 2011, sales revenue rose from 513 million yuan in 2007 to 998 million yuan in 2011, sales prices rose from 4635.80 yuan/ton in 2007 to 8273.24 yuan/ton in 2011, and pre-tax profits rose from 8273.24 yuan in 2007 to 93.8 million yuan in 2011. During the survey period, the domestic potato starch industry was restored and developed.

At the same time, during the survey period, the main economic indicators of similar products in the domestic industry such as production, sales prices, pre-tax profits, market share, investment yield, end-of-term inventory showed fluctuations. In particular, in 2009, the price of EU imports of goods fell by 40.43%, from 6106.29 yuan/ton in 2008 to 3637.73 yuan / ton, at the same time, the sales price of similar products

in the domestic industry fell to the lowest point during the survey period, from 4635.80 yuan/ton in 2007 to 4337.44 yuan/tonne in 2009, in the case of increased production costs, the domestic industrial pretax profit fell sharply, from 2008 profit 4337.44 yuan, down to 2009, the domestic industrial investment rate also decreased sharply, showing negative value. In 2011, affected by the mid-term review of the potato starch and the potato starch countervailing case and ruling, in the EU export volume to China fell 84.87%, the price rose 92.87%, the domestic potato starch industry showed a good recovery and development, the sales price from 2009 to 4337.44 yuan / ton in 2010 to 6583.79 yuan / ton in 2010 and 8273.24 yuan / ton in 2011, the pre-tax profit turned to profit, from 2009 loss of 62,960,500 yuan to 2010, the investment rate was also converted to positive value.

During the survey period, the main economic indicators of the domestic industry showed significant volatility, in the case of a 6.49% decline in sales prices, the profit before tax changed from 3,545,000 yuan to a loss of 62,960,500 yuan, showing obvious vulnerability. Therefore, although the potato starch industry has been restored and developed to a certain extent, it is still vulnerable to the impact and impact of dumped imports from the EU.

Recovery of the domestic industry during the investigation period at the end of the second anti-dumping measures

According to the final review of the second anti-dumping period: Since the implementation of anti-dumping measures, the domestic market demand has generally shown an increasing trend, China's domestic industry has achieved a certain degree of recovery and development, domestic production capacity, production, domestic sales, market share, sales income, start-up rate, labor productivity, per capita wages and other indicators of overall growth trend.

At the same time, the production and operation of the domestic industry remains unstable. During the injury investigation period, the sales price of similar products in the domestic industry showed a volatile trend, with the decline in sales prices in 2015 and 2016, the domestic industry's pre-tax profits were also positive to negative, profitability and financial situation deteriorated again. Moreover, even in 2013, 2014 and the first half of 2017 where pre-tax profits are positive, the domestic industry's profits are at a low level, and the domestic industry is generally in the state of insurance operations. Affected by the changes in pre-tax profit fluctuations, the investment return of the domestic industry has also fluctuated, has been hovering near the profit line, the whole industry is difficult to obtain a reasonable return from business activities. During the damage investigation period, the end-of-term inventory of similar products in the domestic industry has generally increased. In order to meet the overall stable growth of domestic market demand, the domestic industry increased investment, new and integrated a batch of potato starch production

devices, increased cash outflow, but the domestic industry through the sales of similar products has been insufficient cash inflow, the domestic industry in most of the time of the damage investigation period showing a net outflow of gold, increasing the domestic industry's operating pressure. In summary, the investigative organs believe that during the injury investigation period, the domestic industry is in a more vulnerable state, the ability to resist risk is weak, and it is vulnerable to the impact and influence of relevant factors such as imported products.

The situation of the domestic industry during the continued implementation of anti-dumping measures

As mentioned above, the applicant as the association is specifically responsible for the macro management and guidance of the potato starch industry, and the total production of potato starch represents more than 50% of the total domestic production of similar products. According to the relevant provisions of China's "anti-dumping regulations", the applicant has the right on behalf of the domestic potato starch industry to initiate a final review of anti-dumping measures originating in the EU for the application of anti-dumping measures, the applicant's relevant member units' production and financial data can represent the situation of the domestic potato starch industry, and can be used as a basis for determining the domestic potato starch industry.

Due to the number of member units, in order to assess the operating situation of the domestic industry, the applicant collated the birth of 25 member units.

Production and financial data as the basis for determining the status of the domestic potato starch industry. The list of 25 companies is as follows:

The	Name of business	The	Name of business
1	Inner Mongolia Hua Europe Starch	14	Yasher Starch Group Co., Ltd.
2	Monsen Agricultural Technology Co.,	15	Xinjiang Wan Agricultural Technology
3	Inner Mongolia Silver Starch	16	North Big Aboriginal Group Limited
4	Inner Mongolia Liren Starch Products	17	Suhara Yuming Starch Co., Ltd.
5	Solid Priva Starch Co., Ltd.	18	Qinghai River Starch Co., Ltd.
6	Hongda Starch Processing Co., Ltd.,	19	Fengyuan potato industry limited liability
7	Paddock Manchu Mongolia Autonomous County Bin Hao Potato Starch Co.,	20	Ningxia Wall Starch Co., Ltd.
8	Zhang Jiakou Fuxin Agricultural	21	Ningxia Fu Potato Industry Limited
9	Chende Hui Double Starch Co., Ltd.	22	Gansu Blue Sky Potato Industry Development
10	The Great Wall Starch Co., Ltd.	23	Yunnan Yun Starch Co., Ltd.
11	Kanbe County Yunze Agricultural	24	Inner Mongolia potato Yuankang Biotechnology
12	Qinghai Wiston potato Group Limited	25	Gansu Lian Snow Starch Co., Ltd.
13	Huazeng Green Eco-agriculture Development in Hualun Bell		

China's potato starch processing enterprises are mainly distributed in North, Northwest, Southwest and Northeast China, and the above 25 enterprises are the leading enterprises in the production of potato starch in these regions. At the same time, as shown in the table below, the output of 25 enterprises accounts for the main part of the country's total output, so the production and financial data of these 25 enterprises are representative. The following, if there is no special description, there are economic indicators of similar products of the domestic industry are the total or average data of the above 25 production enterprises.

The Unit: Thousands of tons.

Project/ Period	2019in	In2020	In2021	In2022	January-June2023
Total production of 25 member units of	23.18	27.17	34.60	25.87	6.12
Total domestic potato starch production	43.97	63.67	65.33	48.82	9.21
Proportion of China's total production	53%	43%	53%	53%	66%

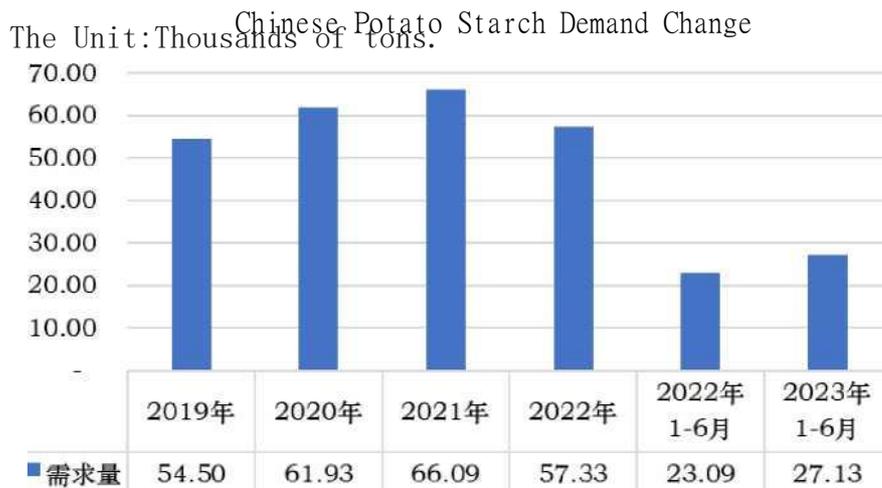
Note to: (1) The total production data of the applicant's 25 member units of potato starch can be found in "Annex XIII: Financial data and statements of applicant member units;

(2) The total domestic potato starch production data can be found in Annex V: A description of the supply and demand for potato starch in China and the European Union.

Through the following analysis of the relevant indicators of the above 25 production enterprises, it can be seen that the anti-dumping measures continue to be implemented during the period, benefiting from the continued implementation of anti-dumping measures and the growth of demand, the domestic industry has obtained further recovery and development, and related economic indicators of similar products, such as capacity, domestic sales volume, market share, domestic sales price, domestic sales income, investment, per capita wages, etc., all showing varying degrees of growth or upward trend. However, the domestic industry's pre-tax profit margins and return on investment have always been at low levels. Therefore, the production and operation of the domestic industry remains unstable and fragile. The following are specific analyses and explanations:

4.1 Changes in demand for similar products in China

Changes in demand for domestic potato starch



The Unit: Thousands of tons.

During the period	China's Demand	Magnitude of change in demand
2019in	54.50	-
In2020	61.93	13.63%

In2021	66.09	6.72%
In2022	57.33	13.25%
January-June2022	23.09	-
January-June2023	27.13	17.50%

Note to: Data on domestic potato starch demand can be found in Annex V:A description of the supply and demand for potato starch in China and the European Union.

From the above chart, it can be seen that during the period when anti-dumping measures continue to be implemented, China's potato starch demand has generally increased. From 2019 to 2022, China's potato starch demand is 545,000 tons, 619,300 tons, 660,900 tons and 573,300 tons respectively, with a cumulative increase of 5.19% from 2019 to 2022. From January to June 2023, demand was 271,300 tons, an increase of 17.50% over the same period last year.

4.2 Changes in production capacity, output and start rate of similar products in the domestic industry

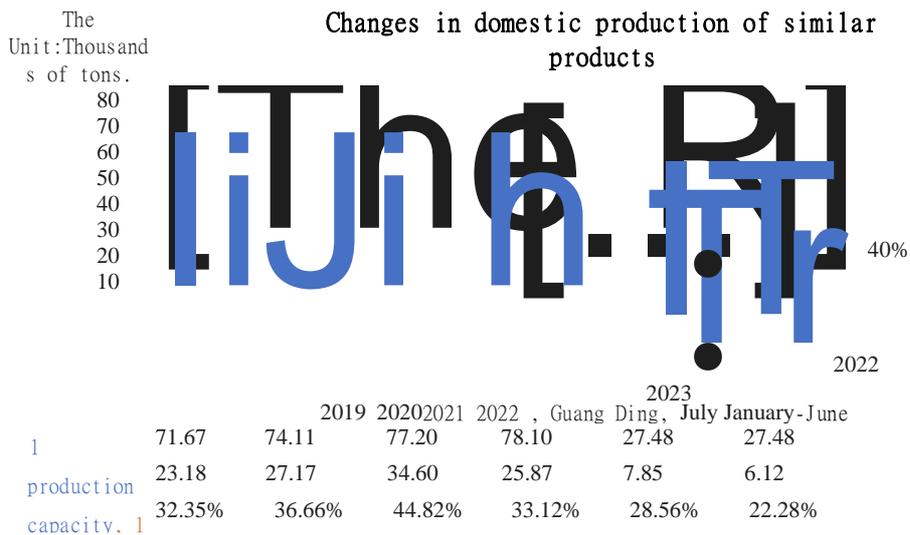
Changes in production capacity, output and capacity utilization of similar products

The Unit: Tons of

During the period	Actual production	Magnitude of change in	Production of	Magnitude of change in	Rate of work	Magnitude of change in
2019 in	716,650	-	231,804	-	32.35%	-
In 2020	741,100	3.41%	271,670	17.20%	36.66%	4.31%
In 2021	772,000	4.17%	346,036	27.37%	44.82%	8.17%
In 2022	781,030	1.17%	258,691	25.24%	33.12%	11.70%
January-June 2022	274,750	-	78,471	-	28.56%	-
January-June 2023	274,750	0.00% of	61,217	21.99%	22.28%	6.28%

Note to: (1) For sources, see "Annex XIII: Financial data and statements of the applicant's membership unit;

(2) Start rate = production / production capacity.



During the period of continued implementation of anti-dumping measures, the production capacity of similar products in the domestic industry has continued to grow, from 716,700 tons in 2019 to 781,000 tons in 2022, a cumulative increase of 8.98%; Production trend up and down, from 2019 to 2021, from 231,800

tons to 346,900 tons, an increase of 49.28%; Production fell to 258,700 tons in 2022,

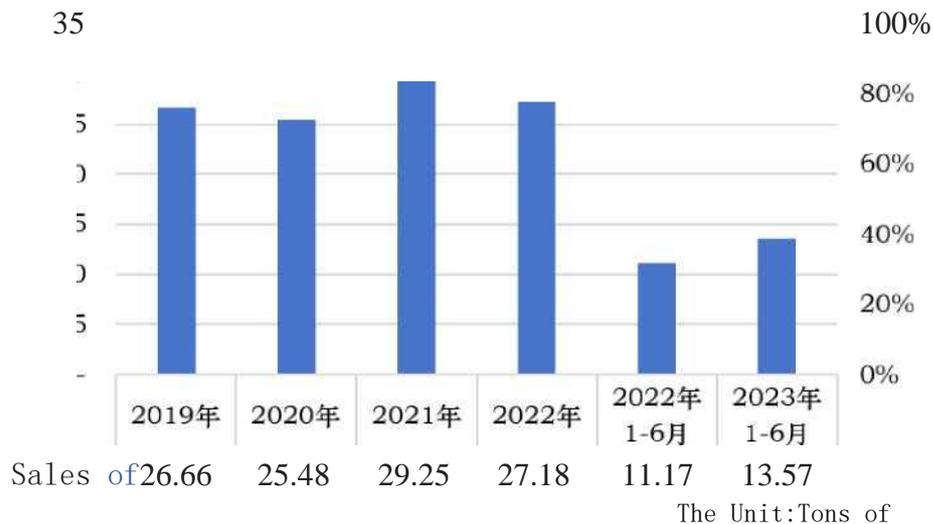
down 25.24% from the previous year, and 61,200 tons in January-June 2023, which continued to decline 21.99% from the same period last year.

In the same period, the start-up rate showed a trend of first rise and decline, and the start rate increased from 32.35% to 44.82% from 2019 to 2021, an increase of 12.48 percentage points. The start-up rate fell to 33.12% in 2022, down 11.70 percentage points from the previous year; From January to June 2023, the start rate continued to decline to 22.28%, down 6.28 percentage points from the same period last year.

4.3 Changes in the number of domestic industry-specific products

Changes in the number of sales of similar products

The Unit: Thousands of tons. Changes in the number of domestic sales of similar products



The Period	Number of sales	Magnitude of change
2019in	266,629	-
In2020	254,823	-4.43%
In2021	292,527	14.80%
In2022	271,774	7.09%
January-June2022	111,692	-
January-June2023	135,732	21.52%

Note to: For the source, see Annex XIII: Financial data and statements of the applicant's members.

During the period of continued implementation of anti-dumping measures, in the context of the overall growth trend of domestic market demand for similar products, the domestic sales volume of similar products in the domestic industry has generally increased trend. From 2019 to 2022, the number of

domestic sales of similar products increased from 266,600 tons to 271,800 tons, a cumulative small increase of 1.93%. From January to June 2023, the internal sales volume was 135,700 tons, compared to the previous year.

This was an increase of 21.52% over the same period.

4.4 Changes in market share of similar products in the domestic industry

Changes in market share of similar products

The Unit:Tons of

The Period	Number of domestic sales	Amount of self-use	China's Demand	Market share	Percentage increase or decrease in market share
2019in	266,629	1,619	545,000	49.22%	-
In2020	254,823	2,291	619,300	41.52%	7.70%
In2021	292,527	2,894	660,900	44.70%	3.18%
In2022	271,774	3,645	573,300	48.04%	3.34%
January-June2022	111,692	2,667	230,900	49.53%	-
January-June2023	135,732	6,138	271,300	52.29%	2.76%

Note to:Market share = (volume of internal sales + self-use) / Chinese demand.For data on sales volume and self-use, see Annex XIII:Financial data and statements of the applicant's members.



During the period of continued implementation of anti-dumping measures, the domestic industry's market share overall trend fell first and then rose. From 2019 to 2022, the market share was 49.22%, 41.52%, 44.70% and 48.04%, down 7.70 percentage points in 2020 from the previous year, and in 2021 and 2022 respectively, respectively, the previous year increased by 3.18 percentage points and 3.34 percentage points, the overall level is basically flat. From January to June 2023, the market share was 52.29%, an increase of 2.76 percentage points over the same period last year.

4.5 Changes in end-end inventory of similar products in the domestic industry

Changes in End Inventory of Similar Products

The Unit:Tons of

The Period	End of Period Stock	Magnitude of change
2019in	140,109	-
In2020	160,657	14.67%
In2021	232,728	44.86%
In2022	218,596	6.07%
January-June2022	188,647	-
January-June2023	133,103	29.44%

Note to:For the source, see "Annex XIII:Financial data and statements of the ..."

Chart of end-of-end inventory changes in domestic similar products
The Unit:Thousands of tons.

It is 111.

				2022	2023
2019 in	2020	2021	2022	It's self-dead.	
End of inventory	1491	16.07	23.27	21.86	18.86 13.31
				January-	JuneJanuary-June

From2019 to 2022, the end-of-term inventory of similar products in the domestic industry showed a significant growth trend, from 140,100 tons to 218,600 tons, a cumulative increase of 56.02%;The inventory at the end of the first half of 2023 was 133,100 tons, down 29.44% from the same period last year.

4.6 Changes in domestic prices of similar products

Changes in prices of similar products

The Unit:Dollars / ton

The Period	Domestic Sales Prices	Magnitude of change
2019in	6,526	-
In2020	6,785	3.98%
In2021	6,464	-4.73%
In2022	6,699	3.62%
January-June2022	6,285	-
January-June2023	7,188	14.37%

Note to:(1) For sources, see "Annex XIII:Financial data and statements of the applicant's membership unit; (2)

Domestic Sales Price = Internal Sale Revenue / Number of Internal Sales.



During the period of continued implementation of anti-dumping measures, domestic prices of similar products in the domestic industry showed a volatile growth trend, with sales prices of 6,526 yuan / ton, \$6,785 USD/ton, \$6,464 USD/ton and 6,699 yuan / ton, in 2020, 2021 and 2022, respectively, an increase of 3.98%, down 4.73% and 3.62%, respectively. The sales price in January-June 2023 was 7,188 yuan/ton, an increase of 14.37% over the same period last year.

4.7 Changes in domestic revenue of similar products

Changes in revenue from sales of similar products

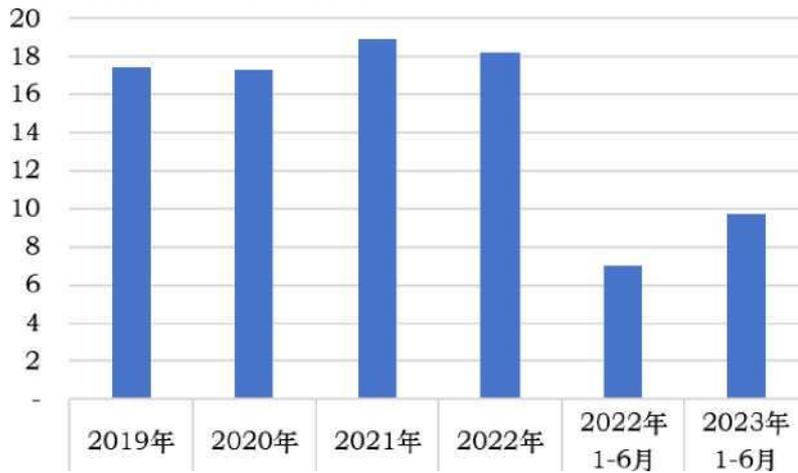
The Unit: It's a dollar.

The Period	Internal Revenue	Magnitude of change
2019in	1,739,920,253	-
In2020	1,729,090,659	0.62%
In2021	1,890,988,752	9.36%
In2022	1,820,508,616	3.73%
January-June2022	701,980,529	-
January-June2023	975,635,501	38.98%

Note to: For the source, see "Annex XIII: The financial data and statements of the applicant's members."

Changes in domestic revenue of similar products

The Unit: Billions of dollars.



Revenue from sales 17.4. 17.29 18.91 18.21 7.02 9.76

During the period of continued implementation of anti-dumping measures, domestic sales revenue of similar products in the domestic industry showed an overall growth trend, from 178,400 tons to 182,100 tons from 2019 to 2022, a cumulative increase of 4.63%. Sales revenue in January-June 2023 was 97,600 tons, an increase of 38.98% over the same period last year.

4.8 Changes in pre-tax profits of similar products in domestic industries

Changes in pre-tax profits for similar products

The Unit: It's a dollar.

The Period	Pre-tax profits	Magnitude of change	Pre-tax profit margins
2019in	104,215,294	-	5.92%
In2020	-59,950	~100.06%	0.003%
In2021	-5,713,633	9430.63%	0.30 percent
In2022	1,935,219	~133.87%	0.11%
January-June2022	-52,855,452	-	7.53%
January-June2023	19,217,388	(Loss turn to profit)	1.97% of

Note to: For the source, see "Annex XIII: Financial data and statements of the applicant's members."



From 2019 to 2022, the overall pre-tax profit of similar products in the domestic industry showed a downward trend, from 104 million yuan in 2019 to 1,935,200 yuan in 2022, a significant decrease of 98.14%, of which there was a small loss in 2020 and 2021. January-June 2023 pre-tax profit of 19,217,400 yuan, compared to the same period last year from loss to profit.

During the same period, the domestic industry's pre-tax profit margin has always been at an extremely low level, and the overall trend is downward. Pre-tax margins in 2019, 2020, 2021, 2022 and 2023 were 5.92%, -0.003%, -0.30 percent, 0.11% and 1.97%, respectively, and continued to struggle near the breakeven line.

4.9 Changes in the return on investment of similar products in the domestic industry

Changes in return on investment of similar products

The Unit: It's a dollar.

The Period	Average total investment	Pre-tax profits	Rate of return on investment
2019in	2,910,235,927	104,215,294	3.58%
In2020	3,131,461,150	-59,950	0.002%
In2021	3,591,103,176	-5,713,633	0.16%
In2022	3,830,956,586	1,935,219	0.05% of
January-June2022	3,586,931,467	-52,855,452	1.47%
January-June2023	3,755,601,294	19,217,388	0.51%

Note to: (1) For sources, see "Annex XIII: Financial data and statements of the applicant's membership unit;

(2) Return on investment = pre-tax profit/average total investment.



During the period when anti-dumping measures continued to be implemented, in order to meet the growth of demand, the domestic industry invested a lot of capital to build and integrate some potato starch production devices, and the investment volume was generally growing, 2022 compared with 2019 increased by 31.64%, and January-June 2023 increased by 4.70% over the same period of the previous year.

However, due to the low level of pre-tax profits, the return on investment of similar products in domestic industries has always been at a low level and is trending downward. From 2019 to 2022, the return on investment of similar products was 3.58%, 0.002%, -0.16% and 0.05%, respectively, a cumulative decrease of 3.53 percentage points. In January-June 2022, the return on investment was 0.51%, an increase of 1.99 percentage points over the same period last year.

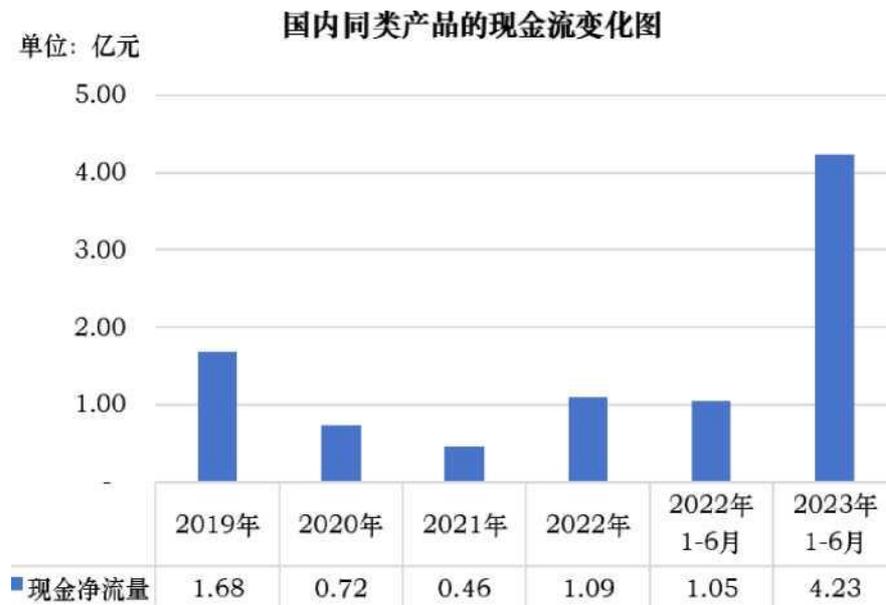
4.10 Changes in net cash flows related to business activities for similar products in domestic industries

Changes in net cash flows to be amortized for similar products

The Unit: It's a dollar.

The Period	Net cash flow	Magnitude of change
2019in	167,900,248	-
In2020	72,248,465	56.97%
In2021	46,038,385	36.28%
In2022	108,719,109	136.15%
January-June2022	104,772,706	-
January-June2023	423,353,825	304.07%

Note to: For the source, see "Annex XIII: Financial data and statements of the applicant's members.



From 2019 to 2022, the net cash flow of similar products in the domestic industry showed a downward trend, from 168 million yuan to 109 million yuan, a cumulative decline of 35.25% during the period. From January to June 2023, net cash flow was 423 million yuan, an increase of 304.07% over the same period last year.

4.11 Changes in wages and employment of similar products in domestic industries

Changes in gross wages, number of employed and per capita wages for similar products

The Unit:Dollars, people, dollars/persons

During the period	Total salary	Number of employed	Extent of change in	Salary per capita	Salary per capita Magnitude of
2019in	63,646,650	1,684	-	37,802	-
In2020	67,283,482	1,743	3.53% of	38,601	2.11%
In2021	89,555,585	2,128	22.06%	42,092	9.04%
In2022	82,723,876	2,001	-5.95%	41,341	1.78%
January-June2022	30,234,131	1,554	-	19,456	-
January-June2023	27,216,093	1,388	-10.68%	19,608	0.78%

Note to:(1) For sources, see "Annex XIII:Financial data and statements of the applicant's membership unit;

(2) The per capita wage = total wage / number of employed persons.

During the period of continued implementation of anti-dumping measures, the number of employment of similar products in the domestic industry appeared to rise and fall, from 1,684 to 2,128 from 2019 to 2022, a cumulative increase of 26.37%;In 2022, 2,001 employment was down 5.95% from the same period last year and 1,388 in January-June 2023, which continued to decline 10.68% from the same period last year.

In the same period, the per capita wages of similar products in the domestic industry have generally increased, and the per capita wage increased from 37,802 yuan/person to 41,341 yuan/person from 2019 to 2022;A cumulative increase of 9.36 per cent;The per capita wage from January to June 2023 is 19,608 yuan/person, an increase of 0.78% over the same period of the previous year.

4.12 Changes in labour productivity of similar products in domestic industries

Changes in labour productivity of similar products

The Unit:Tons, people, tons/persons

During the period	Production of	Total number of employees	Productivity of labour	Magnitude of change in labour productivity
2019in	231,804	1,684	138	-
In2020	271,670	1,743	156	13.21%
In2021	346,036	2,128	163	4.35%
In2022	258,691	2,001	129	-20.51%
January-June2022	78,471	1,554	50	-
January-June2023	61,217	1,388	44	12.66%

Note to:(1) For sources, see "Annex XIII:Financial data and statements of the applicant's membership unit; (2)

Labour productivity = output/employment.

During the period of continued implementation of anti-dumping measures, the labor productivity of the domestic industry was consistent with the trend of production changes, and the overall trend of decline followed by the rise.From 2019 to 2021, labor productivity increased from 138 tons/person to 163 tons/person, a cumulative increase of 18.13%; Labor productivity in 2022 was 129 tons per person, down 20.51 percent from the previous year;Labor productivity in January-June 2023 was 44 tons/person, which continued to decline by 12.66% from the same period last year.

During the continued implementation of anti-dumping measures, despite further recovery and development of the domestic industry, the development is not stable and still in a fragile state, vulnerable to the impact and impact of imported products

During the period of continued implementation of anti-dumping measures, in the market environment of relatively fair competition, in order to meet the continuous growth of domestic market demand, the domestic industry to increase investment, expand the scale, further enhance its own competitiveness, the production capacity of the same products, the amount of domestic sales, market share, domestic sales income, investment, and other economic indicators such as wages to varying degrees of growth or upward trend.It can be seen that the domestic industry has obtained further recovery and development during the continued implementation of anti-dumping measures.

However, the number of domestic industrial production enterprises is more, the production capacity is more dispersed, and more distributed in remote poor areas or underdeveloped areas.At the same time, due to the limitations of natural climate, land conditions and other factors, the domestic industry also has a natural endowment disadvantage in the cultivation and harvesting of potatoes.During the continued implementation of anti-dumping measures, although the domestic industry is constantly committed to improving these unfavourable competitive conditions, it is still significantly under-competitive compared with the EU industry.The EU potato starch industry not only produces large scale, but also has a long history of serious dumping and subsidizing unfair competition.Therefore, the domestic industry's ability to resist risk is relatively weak, easy to be affected and interfered by other factors such as dumped imported products in the EU, which is manifested in the following economic indicators:

First, from January to June 2022 and 2023, the output of similar products in the domestic industry declined continuously, down 25.24% and 21.99% respectively from the same period of the previous year.

Second, in 2022 and January-June 2023, the start-up rate of similar products in the domestic industry decreased continuously, down 11.70 percentage points and 6.28 percentage points respectively from the same period last year.

Third, from 2019 to 2022, the end-of-term inventory of similar products in the domestic industry showed a significant growth trend, with a cumulative increase of 56.02%.

Fourth, from 2019 to 2022, the overall pre-tax profit of domestic industries showed a sharp decline, with a cumulative decline of 98.14%; Pre-tax margins have always been low, with an average pre-tax margin of just 1.46% from January to June 2023, continuing to struggle near the breakeven line.

Fifth, from 2019 to January-June 2023, the overall return on investment of similar products in the domestic industry has always been low and the overall downward trend, from 3.58% to 0.51%.

Sixth, from 2019 to 2022, the net cash flow of similar products in the domestic industry overall showed a downward trend, with a cumulative decline of 35.25%.

Seventh, in 2022 and January-June 2023, the number of employment of similar products in the domestic industry decreased continuously, down 5.95% and 10.68% respectively from the same period last year.

Eighth, in 2022 and January-June 2023, labor productivity of similar products in the domestic industry declined continuously, down 20.51% and 12.66% respectively from the same period last year.

The above situation shows that the domestic industry is still in an unstable and more vulnerable state, the ability to resist risks is weak, and it is vulnerable to other factors such as dumping imported products and other factors and interference. Against this background, if anti-dumping dosing is terminated, the application for investigation products may further flood the domestic market in large quantities, and the domestic industry will not be sufficient to withstand unfair competition practices of imported products and will suffer more serious damage.

Possibility of a substantial increase in the number of imports of products applied for investigation

after the termination of anti-dumping measures

1、 Analysis of supply and demand for similar products in China

1.1 Amount of Domestic Demand

During the continued implementation of anti-dumping measures, China's potato starch demand has generally increased. From 2019 to 2022, China's potato starch demand is 545,000 tons, 619,300 tons, 660,900 tons and 573,300 tons, respectively, and a cumulative increase of 5.19% from 2019 to 2022. From January to June 2023, demand was 271,300 tons, an increase of 17.50% over the same period last year.

1.2 Domestic supply of similar products

China's potato starch production has obvious seasonality, usually in September–November every year for large-scale production and processing. With the promotion of southern potato cultivation, and some enterprises will have the retention of potatoes, individual enterprises in local areas will also process starch in the spring, but the production scale is relatively small.

Anti-dumping measures continue to be implemented, in order to meet the continuous growth of market demand, the domestic industry has also invested funds to further expand the scale of production, the current installation capacity is about 2 million tons. From 2019 to 2022, the total production of national potato starch showed an overall growth trend, 439,700 tons, 636,700 tons, 653,300 tons, 488,200 tons, respectively, a cumulative increase of 11.03 percent. Produced by China's potato starch has obvious seasonality, so the total production of domestic potato starch from January to June 2023 is relatively low, at 92,100 tons.

From the comparison of production demand data, China's potato starch can basically achieve self-sufficiency, and the production capacity can fully meet the demand of the city. As mentioned above, the domestic potato starch industry remains fragile and vulnerable to the impact and impact of imported products. In this context, if the anti-dumping measures are terminated, EU imports are very likely to re-enter a large number of low prices into the Chinese market, especially the EU potato starch average excess capacity is 1.35 times the demand for Chinese potato starch, the EU potato starch large imports will seriously damage the domestic potato starch balance order, leading to serious oversupply in the domestic market, exacerbating market competition.

At that time, due to the market of imported products, the domestic potato starch industry is likely to be forced to reduce production and stop production, resulting in

a reduction in domestic supply of similar products.

Possibility of a substantial increase in the number of products applied for investigation after the termination of anti-dumping measures

2.1 Attractiveness of the Chinese Market

China is the world's second largest potato starch consumer market after the European Union, and consumption in other countries (regions) around the world is relatively dispersed, much smaller than the Chinese market. Domestic potato starch demand has generally increased since 2019. From 2019 to 2022 and January-June 2023, China's potato starch demand is 545,000 tons, 619,300 tons, 660,900 tons, 573,300 tons and 573,300 tons, respectively. Moreover, China has been focusing on the potato starch industry to encourage the development of the agricultural industry, in view of the processing rate of the former potato starch and the consumption level of residents still have great potential for growth, it is expected that the demand for potato starch will continue to maintain steady growth in the next few years.

As the world's largest potato starch production and export region, under the back of the market demand and severe oversupply, demand overall growth and huge potential of the Chinese market is undoubtedly very attractive, the Chinese market will continue to become a must for EU potato starch manufacturers.

2.2 EU Potato Starch Overcapacity and Idle Capacity

The European Union's largest potato starch producer (region) has an annual production capacity of 1,948,800 tons. From 2019 to 2023, the EU's potato starch production was 1,288,900 tons, 1,512,400 tons, 1,635,000 tons, 1,575,000 tons and 1,575,000 tons, respectively, with a start rate of 66%, 78%, 84%, 81% and 76% respectively. The average annual spare capacity is as high as 450,600 tons, accounting for the average proportion of its total capacity as high as 23%.

The EU's potato starch capacity is significantly overcapacitated compared to demand. The annual demand for EU potato starch from 2019 to 2023 is 1,005,100 tons, 1,187,300 tons, 1,171,600 tons, 1,218,200 tons and 1,218,200 tons, respectively. Annual overcapacity is as high as 812,000 tons, accounting for 42% of its total capacity. These excess capacity needs to rely on export depletion and have a strong export capacity.

EU potato starch spare capacity accounted for the average proportion of China's potato starch demand in the same period is 75%, the average proportion of China's potato starch demand in the same period is

135%, its idle capacity and excess capacity relative to the Chinese market volume still pose a greater threat. If anti-dumping measures are terminated, the EU could shift its huge excess capacity of potato starch to China, and could release huge spare capacity to expand production, increase production, and its exports to the Chinese market could increase significantly.

In summary of the above analysis, the applicant believes that if the anti-dumping measures are terminated, China's market, which has huge demand and maintains steady growth, may continue or again become a must for EU manufacturers to transfer their excess capacity and spare capacity at low prices, and the number of products exported to China is likely to increase significantly.

2.3 The dependence of EU potato starch on foreign markets

In addition to supplying the EU's domestic market demand, the EU also exports a large amount of potato starch each year, which is the world's largest export region. EU potato starch exports increased from 292,800 tons in 2019 to 367,300 tons in 2022, with exports accounting for an average annual proportion of total production as high as 24%.

China is an extremely important and unforgettable target market for EU potato starch manufacturers. Even subject to countervailing and anti-dumping, the Chinese market still accounts for a significant share of the EU's total annual exports. Moreover, EU manufacturers have been trying to re-increase exports to the Chinese market, their exports to China increased significantly for two consecutive years in 2020 and 2021, up 38% and 109% respectively from the previous year. If anti-dumping measures are terminated, EU manufacturers are likely to expand production, shift their spare capacity more to the Chinese market, and the number of applications to investigate exports to China is likely to increase significantly.

2.4 EU potato starch exports to the Chinese market

According to Chinese customs statistics: While anti-dumping measures continued, the EU remained the main source of China's potato starch imports, accounting for more than 80% of China's total imports. Although subject to anti-dumping and countervailing measures, the EU's exports to China for investigation products are still on an overall upward trend, with the applied dumping investigation period increasing by 7.81 percent overall compared to 2019 EU potato starch imports, the overall price fell by 3.22%, especially in 2020 and 2021 by significantly expanding exports to China by reducing export prices (prices fell 17.48% in 2020, number increased by 37.72 percent, 2021 price decline of 11.82 percent, volume growth of 109.02%).

That is, even if subject to anti-dumping measures, EU potato starch manufacturers have always been reluctant to give up the Chinese market and try to recapture or expand their market share in China through price cuts. If the anti-dumping measures are terminated and its export restrictions lifted in the Chinese market, EU manufacturers are likely to re-enlarge production, shift excess production to the Chinese market, and the volume of applications to investigate exports to China is likely to increase significantly.

2.5 Application to investigate low-priced exports of products to third countries (regions)

During the application of dumping investigation, EU potato starch manufacturers have adopted a large number of low-cost or even dumping strategies for exports from other countries (regions) other than China, accounting for the proportion of EU potato starch to third countries (regional) total exports as high as 73% in the same period, indicating that the demand for low prices to seek overseas markets is very strong. If anti-dumping measures are terminated, this situation may occur in exports to China, and the volume of these low-priced exports to third countries (regional) is likely to be transferred to the Chinese market in large quantities.

2.6 The EU has a competitive advantage in sales to the Chinese market, increasing the likelihood of its large exports to China.

EU potato starch manufacturers are familiar with the Chinese market and are easier to integrate into the Chinese market. In the case of anti-dumping measures, the volume of its exports to China can still show a growing trend, indicating that its sales channels in the Chinese market are still relatively sound. Once the anti-dumping measures are terminated, the EU can rapidly expand its export business to China and increase the potential for a significant increase in exports to China.

2.7 It's a knot.

In summary of the above analysis, the applicant believes that if the anti-dumping measures are terminated, China's market, which has huge demand and maintains steady growth, may continue or again become a must for EU manufacturers to transfer their excess capacity and spare capacity at low prices, and the number of products exported to China is likely to increase significantly.

(3) Possible effects of applying for investigation of products after the termination of anti-dumping measures on domestic prices of similar products

Application Survey Product Price Trend Forecast

During the continued implementation of anti-dumping measures, the EU applied to investigate the import price of products fell first and then rose, and the overall decline trend. In 2020 and 2021, export prices fell 17.48% and 11.82 percent respectively. In 2022 and January-June 2023, export prices increased by 22.69% and 24.43% respectively. From 2019 to the applied dumping investigation period (July 2022 to June 2023), export prices fell by 3.22% overall.

The number of EU applications to investigate imports increased significantly in 2020 and 2021, with a significant decline in import prices over the same period. In 2020 compared to 2019, import prices fell by 17.48%, while the number of imports increased significantly by 37.72%. In 2021, import prices fell further 11.82 per cent compared to 2020, while the number of imports increased significantly by 109.02%. The applied dumping investigation period (July 2022 to June 2023) decreased by 3.22% compared to 2019, and the number of imports increased by 7.81%.

Given the history of EU applications to investigate low-priced exports of products in anti-dumping and countervailing cases, and even when subject to double countermeasures, EU manufacturers can still increase their exports to China through price reductions during the continuation of anti-dumping measures.

In fact, if the dumping measures are terminated, it is highly likely that the EU's application for investigation products will continue to increase exports to the Chinese market at low prices and lower prices.

Moreover, the application for investigation products and the same specifications of domestic industry similar products have no obvious advantages in product quality, downstream use, sales channels, etc., and price factors will continue to become the main means of applying for investigation products and domestic similar products to compete for the market. Given that the domestic industry has gained a relatively stable market share and position in the Chinese market, EU manufacturers can only compete with the domestic industry if they want to regain China's market share.

In summary, the applicant believes that if the anti-dumping measures are removed, the import price of the products under investigation may fall significantly and be at a low level.

(2) Forecast of domestic price trends of similar products

During the period of continued implementation of anti-dumping measures, domestic prices of similar products in the domestic industry showed a volatile growth trend, from 2019 to 2022, respectively, 6,785 yuan / ton, 6,464 yuan / ton and 6,699 yuan / ton, in 2020, 2021 and 2022, respectively, an increase of 3.98%, down 4.73% and an increase of 3.62%, respectively. 2023 sales price of 7,188 yuan / ton in January-June, an increase of 14.37% over the same period last year.

As mentioned above, the current overall situation of China's potato starch industry is still relatively fragile, the operating situation is very unstable, and the long-term struggle near the breakeven line. Due to the long-term dumping of EU imports in the Chinese market, similar products in the domestic industry are still very sensitive to the volume and price changes of imported products.

EU application to survey the average price comparison of products and similar products in domestic industries

During the period	Application for Sale Prices of Products				Domestic price of similar products (dollars/ton)
	CIF Import Prices (U.S. dollars/ton)	Renminbi import prices	Renminbi import prices containing	Renminbi import prices containing	
2019 in	1,012	8,029	8,895	9,775	6,526
In 2020	835	6,629	7,344	8,070	6,785
In 2021	737	5,466	6,055	6,654	6,464
In 2022	904	6,986	7,740	8,505	6,699
January-June 2022	870	6,484	7,183	7,893	6,285
January-June 2023	1,082	8,621	9,551	10,495	7,188

Note to: (1) Application for survey products CIF import price data from "Annex 7: Number of imports of potato starch from the General Administration of Customs of the People's Republic of China

According to statistics;

(2) RMB import price = imported U.S. dollar price \times (1 + import tariff rate) \times U.S. dollar against RMB exchange rate, potato starch import tariff of 15% during the application period, data sources see "Annex 6: Import and Export Tax of the People's Republic of China, 2019-2023 edition"; For the sources of the exchange rate of the United States dollar against the RMB during the above-mentioned periods, see "Annex XI: Exchange rate statistics;

(3) RMB import price with countervailing tax = import dollar price \times (1 + import tariff rate + countervailing tax rate)

Includes double anti-tax RMB import price = import dollar price \times (1 + import tariff rate + anti-dumping duty rate + counter-adding dumping duty rate), the anti-dumping duty rate and anti-dumping duty rate of the anti-dumping duty rate of the products applied for investigation are calculated according to the tax rate of the company in question (12.6% and 12.4%), which reflects the lowest import level of products applied by the EU;

- (4) The sales price of similar products in the domestic industry is the weighted average domestic price of the applicant's 25 member units, please see "Annex XIII: Financial data and statements of the applicant's members."

As can be seen from the comparison of the import price of the survey products and the sales price of similar products in the above form, it can be seen that during the continuation of anti-dumping measures, without considering anti-dumping duties and countervailing duties, the import price of the EU application for investigation products in 2020 and 2021 is significantly lower than the sales price of similar products in the domestic industry. Even if countervailing measures are only considered and not anti-dumping measures, the EU's application to investigate the import price of products is still lower than the domestic sales price of similar products during the continuation of anti-dumping measures, such as in 2021 with the highest import volume.

In other words, the reason why the EU's application for investigation products and similar products in the domestic industry can compete in a relatively fair and orderly environment is simply because anti-dumping measures and countervailing measures have a common effect on the application to investigate the unfair competition behavior of products. If anti-dumping measures are terminated, the EU's application to investigate the import price of products will have a clear price impact on similar products in the domestic industry, and may even cause price reductions for similar products in the domestic industry.

Moreover, as mentioned above, the large number of low-priced imports of products applied by the EU to investigate would seriously undermine the market's order of supply and demand and have an adverse impact on the domestic industry. For example, in 2020 and 2021, the EU's potato starch imports rebounded, import prices fell sharply, and the domestic industry also experienced corresponding losses during this period.

If the anti-dumping measures are terminated, the EU application for investigation products is likely to flood the Chinese market with a large number of low prices, which will further undermine the market's supply and demand order and lead to a serious oversupply of domestic potato starch. In the face of a sharp drop in the price of the application survey products and the impact of a substantial increase in the number of products, the domestic industry will have to maintain market share, maintain production stability and forced to lower prices to compete with it, and similar products in the domestic industry are likely to be forced to decline significantly.

At that time, the application for investigation products will continue or again cause price reduction, low price and price suppression of similar products in the domestic industry, and the domestic industry will not be able to obtain the profit space.

(4) The effects of applying for investigation products after the termination of anti-dumping measures may have on the domestic industry

During the continued implementation of anti-dumping measures, in the market environment of relatively fair competition, the domestic industry to increase industrial investment in industrial integration, expand the scale, improve product quality, and improve its own competitiveness to a certain extent. The production capacity of similar products in the domestic industry, the volume of domestic sales, market share, domestic prices, domestic sales income, investment, per capita wages have also increased or increased to varying degrees. It can be seen that during the continued implementation of anti-dumping measures, the production and operation situation of the domestic industry continued to obtain a certain recovery and development.

However, the domestic potato starch industry is still very fragile and vulnerable to the impact of imported products. On the one hand, the domestic industry from the beginning of development has been affected by unfair competition practices such as EU import dumping and subsidies, although the domestic industry has been reversed to profit since the implementation of anti-dumping and countervailing measures, but the domestic industry's operating conditions are very unstable, and the fluctuations in pre-tax profits are very obvious and at a very low level; On the other hand, the number of domestic industrial enterprises is more, the production capacity is more dispersed, and more distributed in remote poor areas or underdeveloped areas, the domestic industry's ability to resist risk is relatively weak. In addition, compared with the EU industry, the domestic industry in raw materials potatoes, lack of competitiveness, and the EU potato starch industry has high financial subsidies, so the domestic potato starch industry is clearly at a disadvantage, there is serious unfair competition, always facing a huge crisis of survival and development.

Moreover, as mentioned above, the relevant economic indicators of the domestic industry, especially the unfavourable performance of profits and the amount of products applied by the EU during the same period, there is a strong correlation, the domestic industry to the EU application for investigation products import changes very sensitive, vulnerable to the impact and threat of EU application investigation products.

In this context, if the anti-dumping measures are terminated, a large number of low-priced EU imports are bound to flood the Chinese market, and the domestic industry will not be sufficient to withstand the unfair competition of imported products, and may be affected by a step-by-step impact of imported products, and is likely to suffer more severe effects.

At that time, the production and start rate of similar products in the domestic industry will be a serious decline, sales and market share of similar products may also show a significant decline, domestic prices are likely due to increased competition and decline, and may again be severely reduced and suppressed, leading to a sharp decline in domestic industry similar product profits, resulting in similar products again losses, unable to obtain the corresponding return on investment. In recent years, the huge funds invested by the domestic industry for new installations and integrated resources will not be further effectively recovered, or even lost.

(5) Conclusions: If anti-dumping measures are terminated, damage to the domestic industry may continue or recur

The above analysis shows that:

- 1、 During the continued implementation of anti-dumping measures, the EU's application to investigate the dumping behavior of products continued to be limited by anti-dumping measures, and the domestic industry continued to obtain recovery and development, production capacity, volume of domestic sales, market share, domestic sales price, domestic sales income, investment amount, per capita wages and other economic indicators of varying degrees of growth or upward trend. Further recovery and development of the domestic industry during the continuation of anti-dumping measures;
- 2、 However, the domestic potato starch industry is still very fragile. On the one hand, during the continued implementation of anti-dumping measures, the domestic industry's operating conditions are very unstable, generally at the level of insurance, and because of the continued impact of the EU import dumping and subsidizing unfair competition behavior, the domestic industry for production and investment of huge capital has not yet achieved reasonable returns, long-term struggle near the break-even line. On the other hand, the number of domestic industrial enterprises is more, the production capacity is more dispersed, and more distributed in remote poor areas or underdeveloped areas, the competitiveness is insufficient, and the domestic industry's ability to resist

risks is relatively weak;

- 3、 Evidence shows that the European Union is the world's largest producer and consumer of potato starch, but compared with demand, the EU potato starch market is clearly oversupplied, seriously overcapacity, idle capacity far exceeds the total production of China's potato starch. In this case, the overall demand growth and huge potential of the Chinese market will become a must for EU potato starch manufacturers to transfer excess capacity. Once the anti-dumping measures are terminated, the EU's ability to export potato starch to China will increase significantly, and the number of exports to China will increase significantly;
- 4、 The relevant anti-dumping cases and countervailing cases during the investigation of the original case, the EU's application to investigate the product to China has a large amount of low-priced export history and anti-dumping measures continue to implement the EU through price reduction to increase exports to China shows that even if the anti-dumping measures are bound by anti-dumping measures, EU manufacturers are not willing to give up the Chinese market, China market is very important and can not lose the target market, if the anti-dumping measures, the EU application for investigation products prices are likely to decline further and at a low level;
- 5、 In the above context, if the anti-dumping measures are terminated, a large number of low-priced imported products are bound to flood the Chinese market, and the domestic industry will not be sufficient to resist the unfair competition behavior of imported products, and may be further affected by imported products, and is likely to suffer more serious effects. In order to maintain market share, the domestic industry may even be forced to reduce price competition, which will lead to serious losses of similar products in the domestic industry again. At that time, the operating conditions of the domestic industry will deteriorate again, and huge investments will not be effectively recovered or even lost.

In summary of the above: If anti-dumping measures are terminated, the damage to the domestic industry caused by imports of potato starch originating in the EU may continue or recur.

VI. Public interest considerations

- (1) Continuing anti-dumping measures against EU applications for investigation products is conducive to maintaining the safety of the domestic potato starch industry, and safeguarding the security of

the national economy

In the "Guiding Opinions of the Ministry of Commerce on Maintaining the Safety of Domestic Industry" of April 5, 2004, the Government clearly stated: Industrial security is an important part of China's economic security and an important foundation for national security. The main tasks of maintaining safety in the industry are: Create a favourable environment for our industry to protect it from unfair competition and import surges; Create normal development conditions for the industry, so that the industries can rely on their own efforts to obtain space for development in a fair market environment and win benefits, so as to ensure the comprehensive, stable, coordinated and sustainable development of the national economy and society. Oh, yeah.

In accordance with the above guidance, the applicant considers that: Anti-dumping is precisely to correct unfair trade competition in imported dumped products.

To eliminate the harmful effects of dumping on the domestic potato starch industry. The purpose of anti-dumping measures is to maintain and regulate the normal trade order through unregulated low-priced import practices that undermine the normal market order, and restore and promote fair competition. In the original case of anti-dumping, due to the large number of low-priced exports of EU potato starch to the Chinese market, seriously broke the fair competition order in the domestic market and caused a serious impact on the domestic potato starch industry. In this context, our country continues to take anti-dumping measures against EU potato starch, which has played a positive role in restoring the distorted competition order, maintaining the security of the domestic potato starch industry, and thus safeguarding the security of the national economy.

In view of the termination of anti-dumping measures, the EU application for investigation products may re-export a large number of low prices to the Chinese market, and will continue to cause harm to the domestic industry or again, therefore, continue to take anti-dumping measures on the EU application for investigation products, which is conducive to continuing to protect industrial safety, safeguard the national economic security, and is in line with the national public interest.

(2) Continuing anti-dumping measures against EU applications for investigation products is conducive to the protection of national food security, in line with the relevant national industry policy

As a large agricultural country, the total production of potatoes ranks first in the world, but the processing industry is relatively backward. Since 2000, the state has successively issued a series of policies, the potato processing industry as a focus to encourage the development of the industry, and strive to make small potatoes into a large industry.

While anti-dumping measures continued to be implemented, the relevant national departments continued to support and encourage the development of the potato industry. For example: In 2015, the Ministry of Agriculture proposed a staple potato development strategy, identifying potatoes as the fourth staple food after wheat, maize and rice, in order to improve the national dietary structure and open up new ways to ensure national food security; In 2016, the development of potato staple foods was definitely written into the central document, article 7 clearly pointed out that "to establish a big food view, face the entire land resources, all-round, multi-channel development of food resources, to meet the increasingly diversified food consumption needs ... actively promote the development of potato staple foods"; In February of the same year, the Ministry of Agriculture issued the "Guiding Opinions on Promoting the Development of Potato Industry", clearly proposed to "accelerate the production and development of potato staple food products, choose a batch of suitable varieties for staple food processing, build a batch of high-quality raw material production base, create a batch of staple food processing enterprises, cultivate the habits of consumers to eat potatoes, promote the transformation of potato consumption from side food consumption to staple food consumption, from raw material products to the transformation of manufactured products, change from moderate consumption to nutritional health consumption, cultivate a group of staple food processing enterprises, promote the transformation of potato consumption from by-eating to staple food consumption, to promote the transformation of potato consumption from the consumption of raw materials to the transformation of the production of staple food products, the transformation of a group of high-quality raw materials production base, cultivate the habits of consumers to eat potatoes, promote the transformation of potato consumption from by-eating to staple food products, the transformation of raw material products to nutritional health consumption, cultivate a group of staple food processing enterprises, promote the transformation of potato consumption from side food consumption to staple food consumption, "In 2017, the General Office of the State Council issued the Opinions on Further Promoting the Development of Agricultural Products Processing Industry to promote structural reform on the agricultural supply side and promote the transformation and upgrading of agro-processing industry as the main line, with a conversion rate of 68% by 2020.

Under the guidance of the national potato staple food industry development strategy, the potato processing industry is facing a good development opportunity, whether it is cultivated area, single-product or potato varieties and planting structure adjustment,

to the potato starch processing industry can provide excellent raw material supply, effectively promote the common development of potato cultivation and processing industry, for the potato seed potato and starch to expand the new market and space.

In the above context, if you continue to take anti-dumping measures on EU applications for investigation products, it will continue to provide a good external environment for the healthy development of the domestic potato starch industry, and can guarantee the healthy growth of the domestic industry in a fair and orderly market environment. Therefore, continuing to take anti-dumping measures on EU applications for investigation products is in line with the objectives of the development of relevant national industrial policies and in the national public interest.

(3) Continuing anti-dumping measures against EU applications for investigation products is conducive to safeguarding the sustainable development of the potato starch industry, and also plays a positive role in solving the "three agricultural problems".

Potatoes are resistant to drought, thin ridge resistance, strong disaster resistance, stable and high yield. These advantages and characteristics have led to the potato cultivation and processing industry to become the main three agricultural industries in Northwest, Northeast, North China and Southwest economic poverty and backward areas, covering and benefiting 15 major provinces and more than 60 million potato farmers. Because of its wide-ranging coverage and significant social benefits, it is an important pillar industry for the livelihood of the country in the "three north", "southwest" poor and backward areas, which has been highly concerned by successive party and state leaders, and has been listed as the national "food security", "industrial poverty alleviation, precision poverty alleviation" and the development strategy of "helping-beyond rich farmers".

In recent years, the developed potato processing industry not only produces high-quality raw materials for various industrial fields, but also the pillar agricultural industrialization enterprises in these poor and underdeveloped regions, playing an important role in improving the comprehensive economic benefits of agriculture, increasing farmers' incomes and local fiscal income, expanding rural and urban employment.

According to preliminary estimates, the domestic potato starch industry pays farmers annually from 1.381 billion yuan in 2012 to 3.457 billion yuan in 2022. Moreover, the potato starch also drives the relevant three agro-industries, processing industry, transportation industry, aquaculture, service industry, etc., creating a comprehensive social benefit of nearly 100 million yuan.

In addition, each starch enterprise can drive about 1-20,000 farmers around the industry to get rich, driving the direct employment of about 100 people. Before the comprehensive victory of the fight against poverty, according to incomplete statistics in 2019, Inner Mongolia, Ningxia, Gansu, Yunnan, Heilongjiang and other main production areas of potato starch involved 2,498 households, involving 162,100 potato poor households, and nearly 1.961 billion yuan for poor households.

It can be seen that potato cultivation and processing are local agricultural pillar industries and farmers' poverty alleviation industry. After the comprehensive victory of the fight against poverty, the potato (starch) industry is still the pillar industry in these regions, and is still the main economic source of income generation for local farmers, and still bears the daunting task of consolidating the strong achievements of poverty alleviation and preventing return to poverty. If the domestic industry continues or suffers again because of imports, the past "ditch-ditch farmers" and "potato sales difficult" may reappear, which will have a negative impact on upstream farmers and more of the three-farming problems.

Therefore, the applicant believes that continuing to take anti-dumping measures against EU applications for investigation products is not only beneficial to domestic potato predation.

The health and sustainable development of the powder industry is also conducive to protecting the income stability and growth of upstream farmers, which will play a very important role in supporting rural areas, agriculture, increasing farmers' employment and raising farmers' incomes. At the same time, the healthy development of the potato starch industry also plays an important role in the development of the local regional economy and is in the public interest.

(4) Continuing anti-dumping measures on EU applications for investigation products will not have a material adverse effect on the downstream industry

Although China's potato starch industry started late, under the promotion of national related industrial

policies and resources and market advantages, capacity expansion is rapid and the level of development is high. With the introduction of a set of production lines in Western Europe and northern Europe, as well as the domestic machinery processing industry production, R&D, promotion capabilities, at present, China's potato starch equipment capacity is about 2 million tons, and the domestic market potato starch 2022 demand is about 570,000 tons, even if the demand further stable growth, China's potato starch production capacity is also fully able to meet the demand of the downstream market.

Moreover, in the process of industrial development in the past 30 years, in addition to some of the periods affected by the EU application survey products, the domestic consumer market has always been dominated by similar domestic products. In addition, the purpose of anti-dumping measures is not to keep EU imported products out of the country, but to regulate the market order, protect the stable development of domestic industries, and increase market supply. From the effect of the implementation of anti-dumping measures, after the implementation of the measures, the domestic potato starch supply has basically steadily increased, the domestic industry actively explores and implements the "company + farmers" cooperation mode, through the signing of potato cultivation contracts with potato farmers, and technical training and guidance for local potato farmers, both to ensure the raw materials required for starch processing, but also to the local potato farmers to provide a guarantee, but also to avoid the resurgence of raw material prices and "drenched farmers" situation.

It can be seen that the EU potato starch continues to implement anti-dumping measures, which is conducive to stable production in the domestic industry, release production capacity, increase market supply capacity, and can effectively guarantee the demand growth of downstream industries.

In addition, the quality of domestic potato starch can fully meet the needs of downstream users. According to the anti-dumping and countervailing related cases, domestic potato starch products are "a potato starch product that meets the standard of physiochemical indicators", that is, "optimal grade and first class of potato starch" in the national standard. In the original review and review case, the domestic industry has provided a large number of similar products and EU potato starch quality standards or quality inspection reports as evidence support, the two production quality does not exist, can replace each other.

In particular, the domestic potato starch industry adopts standard production line enterprises to improve year by year, production technology and equipment level compared with the past further improvement,

product quality is also steadily improved, fully to the international advanced level of similar products, and the quality of the EU potato starch is not materially different. Moreover, the major enterprises in each production area are actively introducing international advanced management experience, seriously strengthening the scientific, procedural, and indicator management of enterprises, and most have passed the ISO international management system certification, QS certification, green product certification and other advanced management system certification work, fully safeguarding the product quality of potato starch.

Therefore, the applicant believes that the continued imposition of anti-dumping duties on potato starch imported into the EU will not only adversely affect the upstream and downstream industries, but is conducive to the normal production and operation of the upstream and downstream industries, reasonable prediction and control of raw material costs and reasonable planning for the scale of development in the future. The fundamental purpose of anti-dumping measures is to maintain the normal competition order of the domestic potato starch market, and only in a fair and orderly market competition environment, the potato starch upstream and downstream industry can be based on the positive competition of the potato starch market to obtain fundamental benefits.

(V) Small knots

As an important link in the potato industry chain, the potato starch industry has its own characteristics, both related to its own industrial interests, but also related to national food security, and even involves many problems in the "three farmers". Therefore, when a large number of low-priced imports of imported products continue or again cause damage to the domestic potato starch industry, the damage is not only the industry itself, but also on the national food security and the fundamental interests of farmers. Therefore, the continued anti-dumping measures against EU potato starch has gone beyond the industry itself and is in the national public interest.

In summary, the applicant believes that continuing to take anti-dumping measures is not only conducive to the health and sustainable development of the domestic potato starch industry, but also conducive to the normal production and management and virtuous development of upstream and downstream industries, which is conducive to the protection of national food security, protect the fundamental interests of

farmers, and is in the public interest.

VII. Conclusions and requests

(1) Conclusions

During the continuation of anti-dumping measures, the dumping of potato starch originating in the EU and exported to China continued. Although the production and operation of the domestic potato starch industry continues to be restored and developed, the whole industry is still very fragile, very sensitive to the changes in the quantity and price of imported products, vulnerable to the impact and impact of dumped imported products.

The applicant considers: If the anti-dumping measures are terminated, dumping of potato starch originating in the EU and exporting to China will continue or recur, and the damage caused by EU potato starch to the domestic industry will continue or recur. At the same time, the applicant believes that the continued implementation of anti-dumping measures is in the public interest of the People's Republic of China.

(2) The request

In order to safeguard the legitimate rights and interests of the domestic potato starch industry, in accordance with the Anti-Dumping Regulations of the People's Republic of China and other relevant provisions, the applicant requested the Ministry of Commerce to conduct an end-of-term review of the anti-dumping measures applied to imported potato starch originating in the European Union, and to make recommendations to the Customs Committee of the State Council, potato starch originating in the EU and exported to China in accordance with the Ministry of Commerce Announcement No. 8 of 2007, Announcement No. 4 of 2011, Announcement No. 4 of 2013, Announcement No. 4 of 2016, Announcement No. 4 of 2021.

Part II Application for Confidentiality

Application for Confidentiality

According to the provisions of Article 22 of the Anti-Dumping Regulations of the People's Republic of China, the applicant requests that the materials in this application be treated confidentially, that is, in addition to the investigation authorities in this case and the departments provided for in the Anti-Dumping Regulations of the People's Republic of China, this part of the material may be kept confidential in any way, prohibited from contacting, accessing, reconciling or dissolving in any way.

II. Non-confidential summary

In order for the interested parties in this case to understand the comprehensive information of this application and the annex, the applicant hereby prepares the public text of the application and the annex, and the material and information relating to the application's confidentiality is presented in the public text of the application and the annex.

III. Description of confidential treatment methods

For the public text of this application relating to downstream customers of the applicant's relevant member units, the original customer name is hidden in parentheses "()", and the relevant non-confidential summary is provided in the form of a text summary.

For the evidence in the annex to the public text of this application involving the applicant's confidential information, the full text of the evidence will be applied for confidential processing, and the relevant non-confidential summary is provided only in the form of a text summary.

For the data relating to the trade secrets of the applicant's single member enterprise in the annex to the public text of this application, the data of the single enterprise will not be disclosed, only the total or weighted average data of the applicant's member enterprise is provided, and the aggregate or weighted average data of the member enterprise is disclosed in the form of absolute values, changes and charts.

Part III List and List of Evidence

- Annex I: Certificate of registration and authorization of branches of the applicant's social group
- Annex II: Minutes of the meeting on the end of the anti-dumping review of potato starch
- Annex III: Member Units of Potato Starch Production Enterprises
- Annex IV: Letter of assignment of counsel and certificate of practice of counsel
- Annex V: Description of the supply and demand for potato starch in China and the EU
- Annex VI: Import and Export Tax of the People's Republic of China, **2019-2023** Edition
- Annex VII: Statistics on imports of potato starch from the General Administration of Customs of the People's Republic of China
- Annex VIII: Information note on shipping and insurance premiums
- Annex IX: World Bank Group presentation on EU trade costs
- Annex X: EU potato starch local sales prices
- Annex XI: Exchange rate statistics
- Annex XII: EU potato starch export statistics
- Annex XIII: Financial data and statements of applicant member units