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Public text

Sincerely,

People's Republic of China Ministry of Commerce

The pork and pork by-products industry of the People's Republic of China has applied for an anti-dumping investigation on imports of relevant pork and pork by-products originating from the European Union

Pork and Pork By-products Industry in the People's Republic of China

Application for Anti-dumping Investigation

Anti-dumping investigation applicant:

China Animal Husbandry Association

The applicant's authorized agent:

Beijing Boheng Law Firm

June 6, 2024

Anti-dumping investigation applicant:

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postal code: 100028
Legal representative: He Xintian
Case contact: Shi Shouding
contact number: 010 – 88388699
fax: 010 – 88388300

The applicant's authorized agent:

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确认书

作为对原产于欧盟并向中国出口的相关猪肉及猪副产品提请反倾销调查的申请人的全权代理人，我们已经全部审阅了本反倾销调查申请书及其附件，并代表本案申请人签署本反倾销调查申请书。根据我们目前掌握的信息和资料，我们确认本反倾销调查申请书的内容以及所附的证据是真实、完整的。

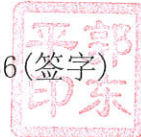
根据《中华人民共和国对外贸易法》和《中华人民共和国反倾销条例》的规定，特此正式提起本次反倾销调查申请。

申请人全权代理人：北京市博恒律师事务所(盖章)



中国注册律师：

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二〇二四年六月六日

Order record

confirmation	3
Part I. Text of the Application	5
I. Relevant information about interested parties	5
(I) Applicants and domestic manufacturers of similar products.....	5
(II) Introduction to domestic industry.....	7
(III) Other Import Reliefs Sought	10
(IV) Information on known manufacturers, exporters and importers of the products under investigation	11
II. Detailed description of the product under investigation and the scope of investigation of the product under investigation requested by the applicant	13
(I) Detailed description of the product under investigation.....	13
(II) Origin and exporting country (region) of the product under investigation	13
(III) Serial number of the product under investigation in the Tariff Schedule of the People's Republic of China (Tariff Schedule Number)	13
(IV) Import tariff rate and value-added tax of the products under investigation	14
III. Detailed description of similar domestic products and comparison with the product under investigation	15
(I) Detailed description of similar domestic products.....	15
(II) Comparison between the product under investigation and similar products in the domestic industry.....	15
IV. Basic information on imports of products under investigation	16
(I) Changes in import volume of products under investigation	16
(II) Changes in import prices of products under investigation.....	19
V. Application for investigation into the dumping of products	20
(I) Calculation Method of Dumping Margin	20
(II) Export price of the product under investigation.....	21
(III) Application for investigation of normal value of products.....	23
(IV) Estimated dumping margin	24
VI. Damage to domestic industries	twenty four
(I) Cumulative Assessment.....	24
(II) Application for investigation of changes in import quantity and price of products and the status of domestic industries	25
1. Changes in the quantity of products under investigation.....	25
2. The impact of the product under investigation on the prices of similar products in the domestic industry.....	26
3. Application for investigation of the impact of products on relevant economic indicators or factors of domestic industries...	33
(III) Extent and type of damage.....	41
VII. Causal Relationship between Dumping and Injury	42
(I) Analysis of the reasons why the products under investigation cause substantial damage to the domestic industry...	42
(II) Analysis of other factors that may cause damage to domestic industries...	49
(III) Conclusion.....	50
8. Consideration of Public Interest	50
IX. Conclusion and Request	52
1. Conclusion	52
(II) Request	52
Part II Confidentiality Application	53
Part III Catalogue and List of Evidence	54

Part I. Text of the Application

I. Relevant information about interested parties

(I) The applicant and domestic manufacturers of similar products

1. Relevant information of the applicant

name say: China Animal Husbandry Association
land site: Xizhimenwai Street, Xicheng District, Beijing112Sunshine Building306room
postal code: 100028
Legal representative: He Xintian
Case contact: Shi Shouding
contact number: 010 – 88388699
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(See "Appendix 1: Social Group Legal Person Registration Certificate and Power of Attorney of the Applicant")

China Animal Husbandry Association, English name China Animal Agriculture Association (CAAA) It is a national industry joint organization composed of enterprises, institutions and individuals engaged in animal husbandry and related industries. It is a non-profit social group with legal personality. It has branches such as pig industry, poultry industry, cattle industry, sheep industry, dog industry, rabbit industry, grass industry, bee industry, special breeding industry, veterinary industry, etc., which are in charge of different areas of animal husbandry.

An important responsibility of the China Animal Husbandry Association is to "establish a market early warning mechanism, participate in industry-related anti-dumping, anti-subsidy and other foreign trade disputes, and coordinate industrial damage investigations and responses to protect industry security."

The pork and pork by-products industry is an important part of my country's animal husbandry. At present, the China Animal Husbandry Association has more than 100 pork and pork by-products member units (see "Appendix 2: Statement on the Application for Anti-dumping Investigation on Relevant Pork and Pork By-products"). These member units are relatively large in scale and are representative and influential in the industry.

In view of the fact that in recent years, large quantities of relevant pork and pork by-products from the European Union have been dumped in China at low prices, which has had an impact and influence on the interests of China's pork and pork by-product industry as well as related breeding industries and farmers, the China Animal Husbandry Association has decided to file an application as the applicant for an anti-dumping investigation on imports of relevant pork and pork by-products originating in the European Union (see "Annex 2: Statement on the Application for Anti-dumping Investigation on Relevant Pork and Pork By-products").

2. Agent appointed by the applicant

For the purpose of applying for the anti-dumping investigation mentioned above, the applicant authorizes Beijing Boheng Law Firm as its full-power agent to handle the application and investigation of the anti-dumping case mentioned above. The specific agency authority is shown in the power of attorney. (Appendix 1: The applicant's social group legal person registration certificate and power of attorney)

According to the applicant's entrustment, Beijing Boheng Law Firm has appointed lawyers Guo Dongping and Lan Xiong to jointly handle all matters related to this case entrusted by the applicant. (Appendix 3: Lawyer's assignment letter and lawyer's practice certificate)

The authorized agent of the applicant for anti-dumping investigation:

Beijing Boheng Law Firm

Guo Dongping lawyer Lawyer's license number: 11101200310402136
Lan Xiong lawyer Lawyer's license number: 11101200310817778

land site: Room 1205, Beiguang Building, No. 23 Huangsi Street, Xicheng District,
postal code: Beijing 100120
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fax: 010-82230598
E-mail: gdp@bohenglaw.com
Website: www.bohenglaw.com

3. Domestic manufacturers of similar products

As mentioned above, the applicant is an industry organization of the pork and pork by-products industry in China. Currently, there are more than 100 member units of pork and pork by-products. These member units are relatively large in scale and are representative and influential in the industry. For a list of domestic manufacturers of similar products, please see "Annex 2: Statement on the Application for Anti-dumping Investigation on Relevant Pork and Pork By-products".

4. The proportion of the applicant's output of similar products to the total domestic output of similar products before the date of application

Unit: 10,000 tons

Project/ Period	2020	2021	2022	2023
Total output of similar products represented by the applicant	1,021.69	1,701.13	2,218.31	2,625.21
Total output of similar domestic products	5,213.66	6,713.24	7,023.80	7,344.51
Proportion of applicants in total domestic production	19.6%	25.3%	31.6%	35.7%

Note: (1) The total production data of pork and pig by-products represented by the applicant is shown in Annex 2;

(2) For the total output of similar domestic products, please refer to "Appendix 4: Explanation of relevant production and operation data of similar domestic products".

Article 6 of my country's "Provisional Rules for Filing Anti-dumping Investigations" stipulates: "Although the output of the applicant accounts for less than 50% of the total output of similar domestic products, if the output of the supporters among the domestic producers who support the application and oppose the application accounts for more than 50% of the total output of the supporters and opponents, and the output of the domestic producers who support the application is not less than 25% of the total output of similar products, the application shall be deemed to be made on behalf of the domestic industry.

In determining the output of the supporter in the first paragraph of this Article, the output of the applicant shall be taken into account.

The data in the above table show that from 2021 to 2023, the total output of similar products of the member units represented by the applicant accounted for more than 25% of the total national output during the same period. Moreover, as of now, the applicant has not learned that other domestic manufacturers of similar products have raised objections to this anti-dumping investigation application. Therefore, in this case, the total output of similar products represented by the applicant accounts for 100% of the total output of similar products of supporters and opponents. According to Article 6 of the above-mentioned "Provisional Rules for the Filing of Anti-dumping Investigations", the applicant has the right to file this anti-dumping investigation application on behalf of the relevant domestic pork and pork by-products industry.

(II) Introduction to domestic industry

China has a tradition of raising and eating pigs since ancient times. The earliest known domestic pig bones in China were unearthed at the Jiahu site in Wuyang County, Luohe City, Henan Province (about 7,500-9,000 years ago). To this day, pork still occupies an important position on the Chinese table.

Pork is the main source of animal protein for Chinese residents, accounting for nearly 60% of the meat consumption structure of Chinese residents, and has long been in a dominant position. Pork is a necessity for people's livelihood, and the pig farming industry is a basic industry with the strategic significance of "pigs and grains to ensure peace in the world". In recent years, China's per capita pork consumption has basically maintained a steady growth trend, and its consumption is much higher than other animal products. From 2020 to 2023, the overall per capita pork consumption in China will increase from 18.2 kg/person in 2020 to 30.5 kg/person in 2023. The dominant position of pork in the meat consumption structure of domestic residents is difficult to shake.

my country is the world's largest pork producer and consumer. In 2023, my country's pork production accounted for about 50% of the world's total, and pork consumption accounted for more than 50% of the world's total. As the largest source of domestic meat consumption in my country, pig farming has grown steadily in recent years. From 2020 to 2023, my country's annual pig output will be 527 million, 671 million, 700 million and 727 million, respectively. Correspondingly, my country's pork production has also grown steadily. From 2020 to 2023, my country's production of related pork and pig by-products will be 52.1366 million tons, 67.1324 million tons, 70.2380 million tons and 73.4451 million tons, respectively, which well meets the people's growing demand for high-quality pork.

For a long time, my country's pork supply has been mainly based on domestic pig slaughtering, with imported pork as a supplement. Before 2006, China's annual imports of pork and pork by-products were generally below 300,000 tons. However, since 2007, China's imports of pork and pork by-products have steadily increased. From 2016 to 2019, the average annual import volume increased to about 2.8 million tons. From 2020 to 2023, China's total imports continued to grow and remained high. The average annual import volume has rapidly increased to 4.08 million tons, a high increase compared with the annual average import volume from 2016 to 2019.

The EU is the largest import source of pork and pork by-products in China. According to statistics from China Customs, from 2020 to 2023, the average annual proportion of EU-approved products in China's total imports of similar products reached 54%, constituting the main part of China's total imports of similar products. From 2020 to 2023, the average annual import volume of EU-approved products reached 2.25 million tons, accounting for 3.37% of the Chinese market share, an increase of 32.4% compared with the average annual import volume of 1.7 million tons in the four years from 2016 to 2019.

The applicant believes that the reason why the export volume of the products under investigation by the EU to China has been able to remain high in recent years is closely related to the low-price and price-reduction dumping measures adopted by its pork and pork by-product manufacturers in China, as well as its own pork supply and demand conditions, consumption habits, and subsidy policies:

First, as described in the relevant part later in this application, the dumping margin of the products under investigation applied by the EU in China in 2023 is as high as more than 60%. Such a huge dumping margin enables the products under investigation applied by the EU to compete in the Chinese market at extremely low and unfair dumping prices;

Second, as the world's largest pork market with the largest consumption and steadily growing demand, China has always been coveted by the world's major pork and pork by-product producing countries (regions), including the European Union. According to statistics from China Customs, from 2020 to 2023, the import price of the products applied for investigation by the EU showed a clear downward trend, down 8% in 2023 compared to 2020. Moreover, the products applied for investigation not only lowered the prices of similar domestic products, but also significantly reduced the prices of similar domestic products, with the price reduction ranging from about 20% to 50%. The significant price inversion between the products applied for investigation by the EU and similar domestic products has resulted in a significant price advantage in their imports, which is also an important reason why the import volume of the products applied for investigation remains high;

Third, due to dietary differences, residents in the EU generally do not eat pig by-products (pig offal, etc.), and it costs a lot to deal with offal and other residues. Therefore, dumping exports to China has become a good choice for EU producers. The huge demand in the Chinese market will bring considerable profits. According to statistics from China Customs, the proportion of EU pig by-product exports to China in the total export volume of its application for investigation products to China has increased significantly from about 28% in 2020 to about 45% in 2023;

Fourth, public data shows¹, there is a large amount of excess capacity in EU pork production. In 2023, the EU's live pig output will account for 18.22% of the global total, ranking second in the world. During the period 2020-2023, the average annual output of pork in the EU will reach 22.65 million tons, but the average annual pork consumption within the EU during the same period is only 18.39 million tons, with an average annual excess capacity of 4.26 million tons. The EU is the world's largest pork exporting country (region), and foreign exports are an important way for the EU to digest excess capacity. As the world's largest pork consumption market, China is extremely attractive to the EU. As the EU's largest pork exporter, it naturally becomes the best destination for it to transfer excess capacity;

Fifth, public data shows², Europe has a large number of subsidies in the agricultural sector. According to the EU's 2023-2027 medium-term budget, the EU directly pays 194 billion euros in agricultural subsidies to member states, an average of 38.8 billion euros per year, of which 82% of EU agricultural subsidies may flow to high-emission animal husbandry. The applicant believes that as an important part of the EU animal husbandry

¹ https://mp.weixin.qq.com/s/sqqBla2eUEvz3F45-2MRlw?poc_token=HMyQVGaj_p3jFHyeTZKeputntOOKZyCovg9F9XBY

² <https://finance.sina.com.cn/jjxw/2024-05-18/doc-inavstr0201040.shtml>

The EU pig and pork industry will also receive huge support and subsidies, which plays a very important role in improving the market competitiveness of its pork and pork by-products, not only ensuring the stable supply of its pork and pork by-product raw materials, but also enabling its pork and pork by-products to maintain low-price cost advantages. This is also an important reason why the EU's application for investigation products can maintain its position as the first import source in the Chinese market for a long time and keep its quantity high.

However, the large amount of subsidies provided by the EU and its relevant member states have seriously distorted the fair competition market environment. EU manufacturers have taken advantage of these competitive advantages to export large quantities of products under investigation to the Chinese market at low prices, causing obvious shocks and impacts on domestic industries.

According to the applicant, there are more than 5,000 domestic manufacturers of similar products, and the industry is highly fragmented. The average domestic market share of a single domestic enterprise is only about 0.02%. From the perspective of industry characteristics, on the one hand, pork, as the main source of animal protein for Chinese residents, is a necessity for people's livelihood and a "basket of vegetables" product closely related to the lives of ordinary people. Downstream users and consumers are very sensitive to the prices of pork and pork by-products; on the other hand, pork and pork by-products are homogeneous bulk agricultural products with large demand, small product differences, and prices that follow the market. Competition is very fierce, and operators have no pricing power and weak bargaining power. The price of the product plays a very important role in whether downstream users and consumers buy it.

Moreover, since 2020, my country's sow inventory, pig inventory, slaughter volume and other indicators and data have generally increased and have remained at a high level. The domestic pig demand has gradually shifted from insufficient supply to a basic balance between supply and demand, and even a phased oversupply market structure has emerged in the later period, resulting in a long-term high supply of domestic pork and pork by-products. As a necessary consumer product, pork has relatively rigid demand. The change from basic balance to oversupply will further make the price of pork and pork by-products very sensitive to "supply" fluctuations. Even if the market supply increases a little, it will have a significant negative impact on the market price.

Therefore, in an industrial situation and market supply and demand environment where the domestic industry is very fragmented, users and consumers are highly sensitive to prices, and market prices are very sensitive to fluctuations in supply, even relatively small changes in supply can have an impact on the overall market price. For this case, during the period 2020-2023, the annual import volume of the product under investigation averaged 2.25 million tons, accounting for an average of 3.37% of the Chinese market share, which is large enough compared to the average share of about 0.02% for a single domestic enterprise. Such import volume and market share are sufficient to have an impact on the domestic market relative to the characteristics of the domestic industry and the market supply and demand environment.

In addition, it is well known that the number of sows in stock is an important indicator for measuring pig and pork production capacity and calculating normal supply relations. In March 2024, the Ministry of Agriculture and Rural Affairs issued the "Implementation Plan for Pig Production Capacity Regulation (Revised in 2024)". According to the plan, the normal stock of sows in my country will be adjusted from 41 million to 39 million, and 2 million sows will be eliminated. In the case of deep losses in the entire industry in 2023, in order to maintain a healthy and stable supply and demand of pork nationwide, only 2 million sows will be eliminated. If the annual average import volume of the products applied for investigation is converted into the normal stock of 41 million sows from 2020 to 2023, 3.37% of the sow production capacity is about 1.4 million sows, which is by no means a small number compared to the 2 million eliminations. Such a number will have a great impact on the supply of domestic live pigs, pork and pig by-products.

<https://mp.weixin.qq.com/s/Y-BwC6Njifbd6vC0PBnmFg>

The influence of prices is very obvious. In fact, according to public information, the four major pig farming companies, New Hope, Zhengbang Technology, Tianbang Food, and Aonong Bio, have eliminated only 1.49 million sows in more than two years from the end of 2021 to 2024.⁴

Moreover, the impact of the import quantity and price of the products under investigation are intertwined and work together. The large-scale and low-priced imports of the products under investigation have aggravated the domestic oversupply situation, which in turn affected the prices of live pigs and pork, prolonged and intensified the time and degree of price decline, and aggravated the industry's losses.

In fact, preliminary evidence in this case shows that the dumping margin of the products under investigation is as high as 60% and the price reduction of domestic similar products is as high as 20%-50%. In addition, the high import volume has caused obvious impact and influence on the production, operation and financial status of similar products in the domestic industry:

On the one hand, from 2020 to 2023, although the production, sales and market share of similar products in the domestic industry showed an upward trend, the growth in production and sales of similar products did not bring corresponding economies of scale and profits to the domestic industry. Moreover, the inventory of similar products showed a continuous upward trend.

On the other hand, as prices were depressed and cut by the products under investigation, the ability of similar products to create benefits was significantly negatively affected. During the entire application investigation period, prices, revenues, and profits of similar products in the domestic industry continued to decline. The entire industry has gone from profitability in 2020 to continuous losses since 2021, and the amount of losses has continued to expand.

Moreover, the decline and deterioration of the prices and profitability of the domestic pork and pig by-products industry has also had a significant impact on my country's pig farming industry, resulting in 2023 Year-on-year 2020 In 2018, the national live pig price dropped significantly.⁵ 4% The net profit of pig farming in China has also shown a sharp decline overall.²⁰²³ The company suffered huge losses in 2017, which seriously affected the interests of the breeding industry and farmers.

In view of the fact that the large-scale, low-price dumped imports of the products under investigation have already caused an impact and influence on the interests of China's pork and pork by-products industry, related breeding industries and farmers, and the great possibility that the damage will be further aggravated, the applicant, on behalf of the relevant pork and pork by-products industry in China, urgently filed this application for an anti-dumping investigation on pork and pork by-products originating in the European Union and exported to China, in order to safeguard the legitimate rights and interests of relevant domestic industries and ensure the healthy and stable development of relevant domestic industrial chains.

(III) Other import relief sought

Up to now, except for the anti-dumping investigation application filed this time, the domestic pork and pork by-products industry has not filed any trade relief application against any enterprise, organization or country or region exporting relevant pork and pork by-products to China in accordance with the Foreign Trade Law of the People's Republic of China, the Anti-dumping Regulations of the People's Republic of China and other relevant laws and regulations, nor has it taken or made any other legal action for import relief.

⁴<https://mp.weixin.qq.com/s/WQwaGsu9EYkGi9cVhtNBgA>

(IV) Information on known manufacturers, exporters and importers of the products under investigation

The applicant shall provide the following list of known manufacturers, exporters and importers of the products under investigation in the EU based on reasonably available information and materials:

1, manufacturer

(1) Company Name: CONSERVATS AND FRIGORIFICOS
CARNE, SA (FACCSA)

company address: PLAZA PROLONGO, 2, CARTAMA, MALAGA electricity

Words: +34 952 42 00 50

pass True: +34 952 42 13 15 site:

net <https://faccsa.com/es/>

(2) Company Name: Van Rooi Meat BV

company address: Roggedijk 4, 5704 RH Helmond

electricity Words: +31 (0) 492 – 77 99 00

pass True: +31 (0) 492 – 77 99 01

net site: <https://www.vanrooimeat.nl/nl/home-en/>

(3) Company Name: DANISH CROWN, Blans

company address: Langbro 7, 6400 Sønderborg

electricity Words: +45 8919 2600

pass True: +45 8919 2640

net site: <https://www.danishcrown.com/zh-cn>

(4) Company Name: GATINE VIANDES

company address: 35 RUE DE LA BOUGEOIRE CS 51001 35130 LA GUERCHE DE
BRETAGNE

electricity talk: 02 99 96 25 62

Email: dpolesmousquetaires@mousquetaires.com

Website: <https://www.gatineviandes.fr/>

(5) Company Name: Queally Pig Slaughtering Ltd., T/A Dawn Pork & Bacon

company address: Grannagh, Waterford, Ireland electricity

Words: +353 51 870210 site: <http://>

net www.dawnpork.com/

2. Exporters

According to the applicant's understanding, the above-mentioned major manufacturers are engaged in export business, ie they are also exporters.

3. Importer

Known importers of products under investigation in China include but are not limited to the following companies:

(1) Company Name: Qingdao New Ocean International Logistics Co., Ltd.

Company Address: Weiyi Road, Keyuan, Laoshan District, Qingdao City, Shandong Province1NumberBseattwenty onelayer2102

Room contact number:0532-85801818

(2) Company Name: China Foods Group Co., Ltd.

Company address: No. 45, Fuxingmennei Street, Xicheng District, Beijing

contact number:010-58930850

(3) Company Name: Youhe Group Co., Ltd.

Company Address: Guiyuan Street, Luohu District, Shenzhen, Guangdong5002Shun Hing Plaza Main Building

902-1 contact number:0755-82465386

(4) Company Name: Qingdao Xinhemei Import and Export Trading Co., Ltd.

Company Address: Pudong Road, Liuting Street, Chengyang District, Qingdao City, Shandong Province3Number5

building5020Office contact number:0532-88010567

(5) Company Name: Shenzhen Shennong International Logistics Development Co., Ltd.

Company Address: Dannong, Bainikeng, Pinghu Street, Longgang District, Shenzhen1Haijixing E-commerce Building19

Contact phone number:0755-89322272

(6) Company Name: Beijing Yuanxianggang Trading Co., Ltd.

Company Address: Majiabao West Road, Fengtai District, Beijing15Times Sail Building28 (1-01)

Contact number:010-67585581

(7) Company Name: Shanghai Qizhi International Trade Co., Ltd.

Company Address: Nanqiao West Huancheng Road, Fengxian District, Shanghai3333Number4

Building901Office contact number:021-50391963

(8) Company Name: Suzhou Henghui International Trade Co., Ltd.

Company Address: Jiayuan Road, Yuanhe Street, Xiangcheng District, Suzhou City, Jiangsu Province788

Number801 contact number:0512-67568110

II. Detailed description of the product under investigation and the scope of investigation of the product under investigation requested by the applicant

1. Detailed description of the product under investigation

Chinese name: Related pork and pork by-products

English name: Certain pork and pig by-products

Product Description: The products under investigation are processed products from the slaughter of live pigs, including: fresh, chilled or frozen pork; fresh, chilled or frozen edible pig offal; fresh, chilled, frozen, dried, smoked, salted or pickled pork fat and pig fat without lean meat that has not been rendered or extracted by other methods; fresh, chilled, frozen, dried, smoked, salted or pickled pig intestines, bladders and stomachs, whole or in pieces.

The main purpose: Mainly for human consumption.

(II) Origin and exporting country (region) of the product under investigation

Scope of investigation application: relevant pork and pork by-products originating from the EU and exported to China.

(III) The serial number of the product under investigation in the Tariff Schedule of the People's Republic of China (Tariff Schedule Number)

The products under investigation are listed in the import and export tariff code of the People's Republic of China as follows:

Serial number	Tariff No	item name
1	02031110	Fresh or chilled whole or half suckling pig meat
2	02031190	Other fresh or cold whole or half head pork
3	02031200	Fresh or cold bone-in pork front leg, pork hind leg and their meat pieces
4	02031900	Other fresh or cold pork
5	02032110	Frozen whole and half suckling pig meat
6	02032190	Other frozen whole and half heads of pork
7	02032200	Frozen bone-in pork front leg, pork hind leg and meat pieces
8	02032900	Other frozen pork
9	02063000	Fresh and cold pork offal
10	02064100	Frozen pork liver

11	02064900	Other frozen pork offal
12	02091000	Unrefined or otherwise extracted fat without lean meat Pork, pork fat, fresh, chilled, frozen, dried, smoked, salted or salted
13	05040011	Salted pig intestine casings (except pig large intestines)
14	05040014	Salted pig intestines
15	05040029	Stomachs of other animals
16	05040090	Other animal intestines and bladders, whole or in pieces

Note: The tariff number in the above table 05040029 and 05040090 in addition to the products under investigation, other products are also included.

Products other than pig products under these two tariff codes are not within the scope of this application for investigation.

(See Annex V: "Tariff of the People's Republic of China for Import and Export, 2020-2023 Edition")

(IV) Import tariff rate and value-added tax of the product under investigation

Import tax rate: The most-favored-nation tax rate or provisional tax rate shall apply to relevant pork and pork by-products imported from the EU, as follows:

Serial number	Tariff No	2020 Tax Rates	2021 Tax Rates	2022 Tax Rates	2023 Tax Rates
1	02031110	20%	20%	20%	20%
2	02031190	20%	20%	20%	20%
3	02031200	20%	20%	20%	20%
4	02031900	20%	20%	20%	20%
5	02032110	12%	12%	12%	12%
6	02032190	12%	12%	12%	12%
7	02032200	8%	8%	12%	12%
8	02032900	8%	8%	12%	12%
9	02063000	20%	20%	20%	20%
10	02064100	20%	20%	20%	20%
11	02064900	12%	12%	12%	12%
12	02091000	20%	20%	20%	20%
13	05040011	20%	20%	20%	20%
14	05040014	20%	20%	20%	20%
15	05040029	20%	20%	20%	20%
16	05040090	20%	20%	20%	20%

VAT rate:9%

(See Annex V: "Tariff of the People's Republic of China for Import and Export, 2020-2023 Edition")

III. Detailed description of similar domestic products and comparison with the product under investigation

1. Detailed description of similar domestic products

Chinese name:Related pork and pork by-products

English name:Certain pork and pig by-products

Product Description:Similar domestic products are products after the slaughter and processing of live pigs, including: fresh, chilled and frozen pork; fresh, chilled and frozen edible pig offal; fresh, chilled, frozen, dried, smoked, salted or pickled fat pork and pig fat without lean meat that has not been rendered or extracted by other methods; fresh, chilled, frozen, dried, smoked, salted or pickled, whole or cut pig intestines, bladders and stomachs.

The main purpose:Mainly for human consumption.

(II) Comparison between the product under investigation and similar products in the domestic industry

1, The sameness or similarity between the relevant pork and pork by-products produced by domestic enterprises and the products under investigation in terms of sensory items and physical and chemical indicators

The quality of relevant pork and pig by-products can be judged from sensory indicators (such as color, tenderness, smell, etc.), physical and chemical indicators and food safety indicators (pesticide residues, drug residues, microorganisms and pathogenic bacteria detection, etc.). The physical and chemical indicators and food safety indicators of the relevant pork and pig by-products produced by domestic enterprises and the products under investigation can meet the domestic food safety standards. There is no substantial difference in quality between the two products and they can replace each other.

2, The same or similarity between the relevant pork and pig by-products produced by domestic enterprises and the products under investigation in terms of pig breeds

The relevant pork and pork by-products produced by domestic enterprises are basically the same as the products under investigation in terms of pig breeds, including but not limited to Duroc, Landrace, Large White and other breeds and their hybrids (also known as "foreign three-way pigs", which are produced by hybridizing Duroc, Landrace and Large White).

3, The same or similar production process between the pork and pork by-products produced by domestic enterprises and the products under investigation

The processing and production process of the relevant pork and pork by-products produced by domestic enterprises is basically the same as that of the products applied for investigation. The main processes include: showering live pigs → stunning and bleeding → depilation → sternum rupture and laparotomy → removal of internal organs → removal of heads → splitting in half → inspection → removal of heads, hooves and tails → cooling (freezing) → cutting and packaging, etc.

4, The sameness or similarity between the relevant pork and pork by-products produced by domestic enterprises and the products under investigation in terms of consumption areas and uses

The main use of the relevant pork and pork by-products produced by domestic enterprises and the products under investigation in the Chinese market is for human consumption. The two products can be sold to consumers directly or indirectly through wholesale or retail methods such as farmers' markets and supermarkets, or through channels such as catering and processing enterprises.

5, The sameness or similarity between the relevant pork and pork by-products produced by domestic enterprises and the products under investigation in terms of sales channels and customer groups

The pork and pork by-products produced by domestic enterprises are mainly sold in domestic markets through direct sales or agents. The products under investigation are also mainly imported through direct sales or agents, entering the Chinese market by sea, and then sold in the domestic market through modern logistics.

The relevant pork and pig by-products produced by domestic enterprises overlap with the products under investigation in terms of sales channels and sales regions, and compete with each other. Moreover, the relevant pork and pig by-products produced by domestic enterprises overlap and intersect with some of the customers of the products under investigation. These customers purchase and use both the products under investigation and the relevant pork and pig by-products produced by domestic enterprises.

6, in conclusion

Based on the above analysis, the pork and pig by-products produced by the domestic enterprises are basically the same as the products under investigation in terms of sensory items, product quality, pig breeds, production process, use, sales channels and customer groups, and are similar and comparable and can be substituted for each other. Therefore, the two products belong to the same category.

IV. Basic information on imports of products under investigation

(I) Changes in import volume of products under investigation

1. Changes in the absolute import quantity of the product under investigation

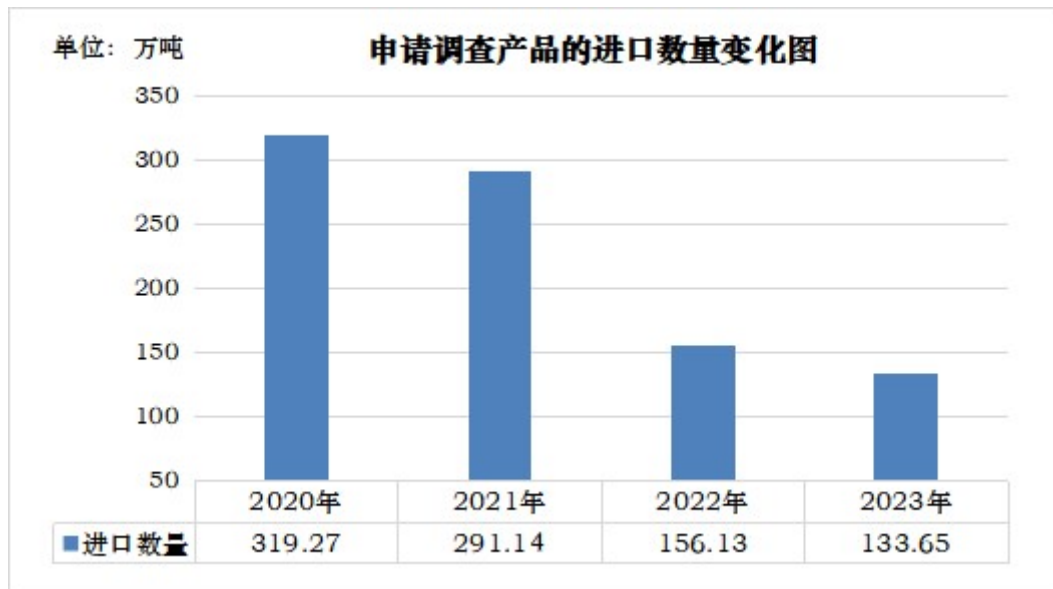
Table of changes in import quantity of products under investigation

Quantity unit: tons

period	Country (Region)	Import quantity	The proportion of quantity	Quantity change range
2020	China's total imports	5,732,170	100.00%	-
	European Union	3,192,691	55.70%	-
2021	China's total imports	5,001,961	100.00%	-12.74%
	European Union	2,911,368	58.20%	- 8.81%
2022	China's total imports	2,859,897	100.00%	- 42.82%
	European Union	1,561,304	54.59%	- 46.37%
2023	China's total imports	2,708,111	100.00%	- 5.31%
	European Union	1,336,533	49.35%	- 14.40%

Note:(1) For data sources, please refer to Appendix 6: "Statistics of relevant pork and pork by-products import and export data in my country";

(2) quantity = import quantity of the product under investigation / total import quantity of similar products in China.



The data in the above charts show that from 2020 to 2023, the average annual proportion of products subject to investigation in China's total imports of similar products will be 54%, constituting the main part of China's total imports of similar products.

In terms of absolute import volume, the import volume of the products under investigation from 2020 to 2023 will be 3.1927 million tons, 2.9114 million tons, 1.5613 million tons and 1.3365 million tons. From 2020 to 2023, the average annual import volume of the products under investigation will reach 2.25 million tons.

2. Changes in the relative import volume of the products under investigation

2.1 Changes in domestic demand for similar products

Changes in domestic demand for similar products

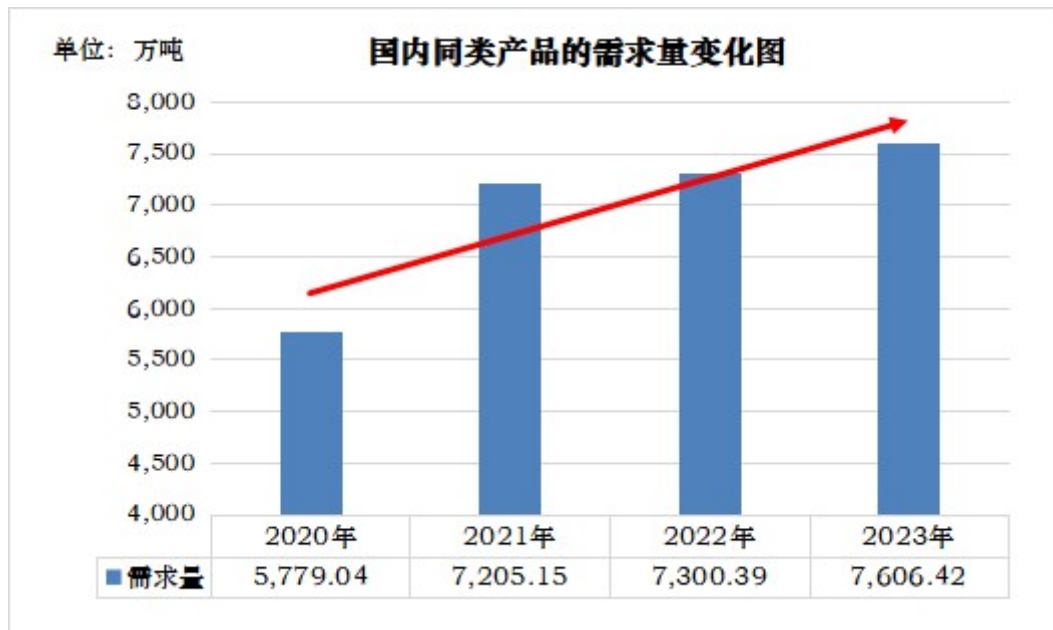
Quantity unit: 10,000 tons

period	Total production	Total import volume	Total export volume	Apparent consumption	Range of change
2020	5,213.66	573.22	7.84	5,779.04	-
2021	6,713.24	500.20	8.29	7,205.15	24.68%
2022	7,023.80	285.99	9.40	7,300.39	1.32%
2023	7,344.51	270.81	8.90	7,606.42	4.19%

Note:(1) For the source of the total domestic output of similar products, please refer to Appendix 4; for the source of the total import and export data, please refer to Appendix 6;

(2) Apparent consumption = total output + total imports - total exports;

(3) The applicant uses apparent consumption as demand data.



As shown in the above chart, from 2020 to 2023, the domestic demand for related pork and pork by-products will continue to grow, which will be 57.7904 million tons, 72.0515 million tons, 73.0039 million tons and 76.0642 million tons from 2020 to 2023, respectively. From 2021 to 2023, it will increase by 24.68%, 1.32% and 4.19% respectively compared with the previous year, and in 2023, it will increase by 31.62% compared with 2020.

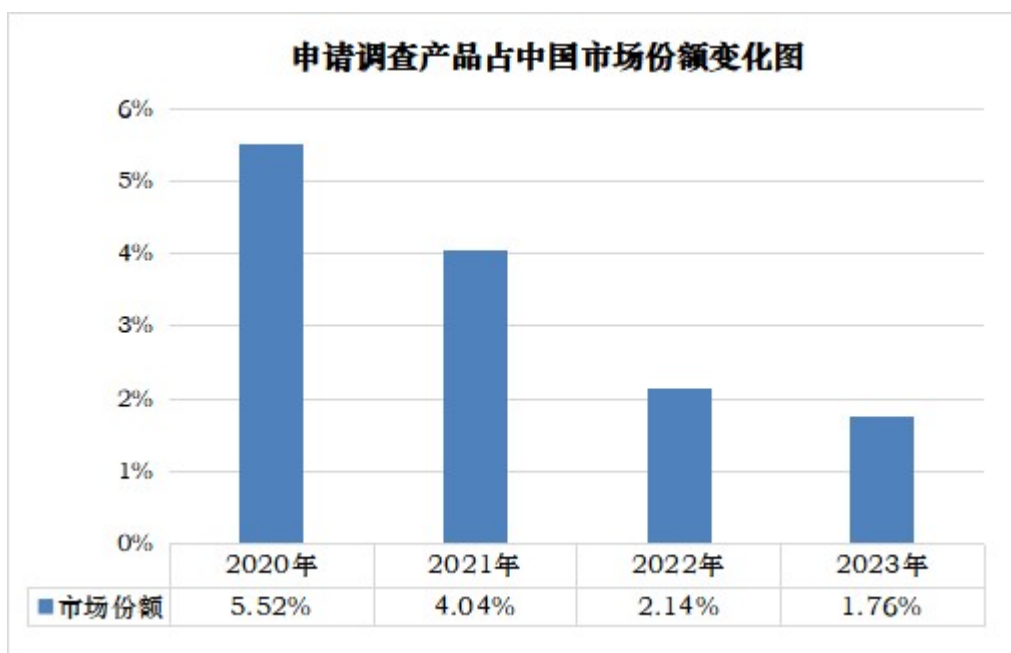
2.2 Changes in import volume of the product under investigation relative to domestic demand

Apply to investigate changes in the market share of products in China

Quantity unit: 10,000 tons

period	Apply for product survey	Domestic similar products	Apply for product survey	Share increase or decrease
	Import quantity	Demand	market share	percentage point
2020	319.27	5,779.04	5.52%	-
2021	291.14	7,205.15	4.04%	- 1.48
2022	156.13	7,300.39	2.14%	- 1.90
2023	133.65	7,606.42	1.76%	- 0.38

Note: Market share = import quantity of the product under investigation / domestic demand.



As shown in the above chart, from 2020 to 2023, the Chinese market share of the products under investigation will be 5.52%, 4.04%, 2.14% and 1.76%, with an average annual share of 3.37%.

(II) Changes in import prices of products under investigation

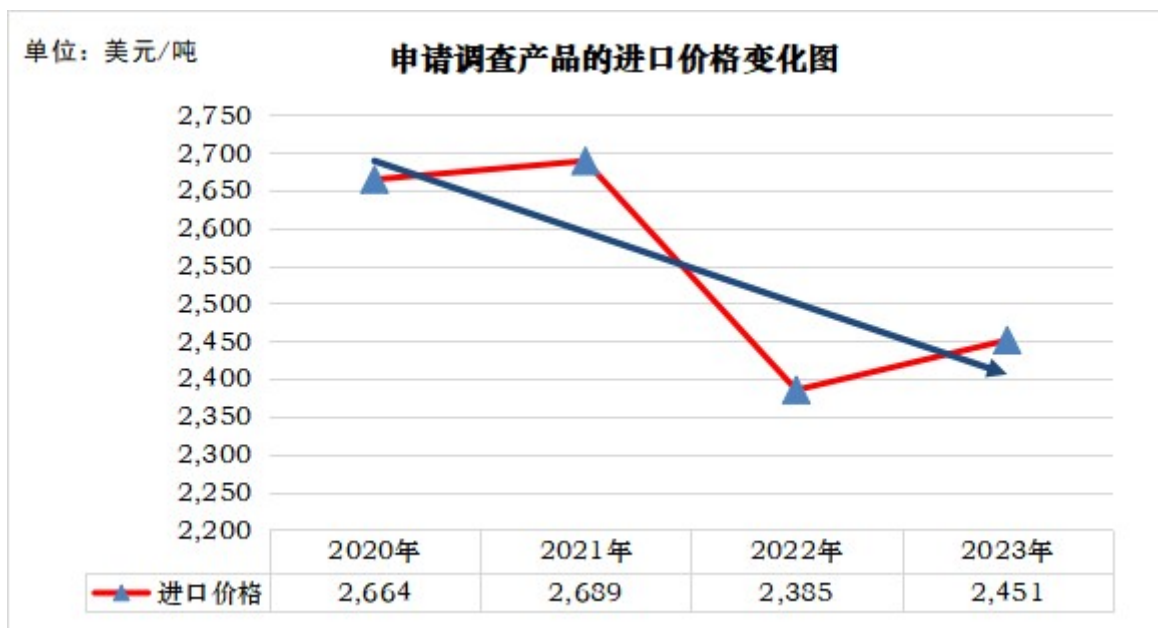
Apply for product survey CIF Changes in import prices

Unit: Ton, USD, USD/ton

period	Country (Region)	Import quantity	Import amount	Import price	Price change
2020	China's total imports	5,732,170	14,845,443,267	2,589.85	-
	European Union	3,192,691	8,506,768,459	2,664.45	-
2021	China's total imports	5,001,961	13,145,586,334	2,628.09	1.48%
	European Union	2,911,368	7,828,486,996	2,688.94	0.92%
2022	China's total imports	2,859,897	6,717,644,195	2,348.91	- 10.62%
	European Union	1,561,304	3,724,065,418	2,385.23	-11.29%
2023	China's total imports	2,708,111	6,410,110,938	2,367.00	0.77%
	European Union	1,336,533	3,276,222,603	2,451.29	2.77%

Note:(1) For the data source of the above table, please refer to Appendix 6;

(2) Import price = import amount/import quantity.



As shown in the above chart, from 2020 to 2023, the import prices of the products under investigation were US\$2,664/ton, USD 2,689/ton, USD 2,385/ton and USD 2,451/ton, up 0.92% in 2021 compared with 2020, down 11.29% in 2022 compared with 2021, up 2.77% in 2023 compared with the previous year, and down 8% in 2023 compared with 2020.

V. Application for investigation into the dumping of products

According to the preliminary evidence currently available to the applicant, there is dumping of the relevant pork and pork by-products originating from the EU and exported to China. Below, the applicant applies to use January 1, 2023 to December 31, 2023 as the dumping investigation period of this case, and preliminarily estimates the dumping margin of the relevant pork and pork by-products originating from the EU and exported to China based on the information and data currently available.

1. Calculation method of dumping margin

1. Due to limited information, the applicant is unable to obtain detailed information on the specific transaction price of relevant pork and pork by-products originating from the EU exported to China in 2023. The applicant temporarily calculated the weighted average import price based on the Chinese Customs import data. CIF price is used as the basis for calculating its export price.

2. Due to limited information, the applicant is temporarily unable to learn the actual transaction price of the relevant pork and pork by-products in the EU in its domestic market. According to the second paragraph of Article 4 of the Anti-dumping Regulations: "If similar products of imported products are not sold in the normal trade process of the exporting country (region) market, or the prices and quantities of such similar products cannot be fairly compared, the normal value shall be the comparable price of such similar products exported to an appropriate third country (region) or the production cost of such similar products in the country (region) of origin plus reasonable expenses and profits." Therefore, the applicant temporarily uses the EU

The normal value before adjustment is the comparable price of the relevant pork and pork by-products exported from the EU to an appropriate third country (Japan).

3. Based on the export price and normal value before the above adjustment, the applicant shall make appropriate adjustments and compare them at the level of the same trade link to estimate the dumping margin of the relevant pork and pork by-products originating in the EU and exported to China.

4. The Applicant reserves the right to make further changes and assertions regarding the export price, normal value and calculation of the dumping margin based on further data and information collection.

(II) Export price of the product under investigation

1. Export price before adjustment

Unit: Ton, USD, USD/ton

period	country / region)	Export quantity	Export amount	Export price
2023	European Union	1,336,533	3,276,222,603	2,451.29

Note: (1) For data sources, please refer to Appendix 6;

(2) Export price = export amount/export quantity.

2. Price Adjustment

According to the law, with regard to price adjustment and price comparison, the applicant shall make appropriate adjustments to the normal value and export price in terms of sales conditions, taxes, trade links, quantity, physical characteristics, etc. When comparing the normal value and export price, it shall be done as much as possible on sales at the same trade link and at the same time.

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

2.1 Appropriate Adjustment of Import Duties, Value Added Tax and Importer's Profit

Since the export price known to the applicant is a weighted average CIF price, prices do not include import duties, value added tax, etc., and this adjustment should not apply.

2.2 Appropriate adjustments to sales conditions and trade links

Since the export price known to the applicant is CIF, the export price, in order to compare with the normal value at the ex-factory level, should be deducted from the above price the various costs from the EU factory to China, including international freight, international insurance, port charges, EU domestic freight, domestic insurance, packaging fees, discounts, commissions, credit costs, warehousing, commodity inspection fees and other fees, etc.

In general, the above-mentioned costs can be roughly divided into overseas costs from the EU to China and domestic costs within the EU.

Regarding the overseas costs, according to the applicant's understanding, the EU exports relevant pork and pork by-products to China mainly by sea, and each 40-foot container can transport approximately 27 tons of relevant pork and pork by-products. In order to reasonably adjust the shipping costs and insurance premiums, the applicant temporarily adjusts the export price based on the preliminary obtained shipping costs and insurance rates of 40-foot containers from the EU to China. According to international practice, the insurance premium is calculated based on 110% of the CIF value of the goods, and the insurance premium is equal to $CIF \times 110\% \times \text{insurance rate}$. Regarding other expenses, according to the principle of prudence, they will not be deducted for the time being. The preliminary evidence of shipping costs and insurance premiums obtained by the applicant is as follows:

Unit: USD, USD/ton

Country (Region)	shipping fee (40ft container)	Ocean Freight Unit Price (Each container can transport 27Ton)	insurance rate	Insurance premium unit price
European Union	1600	59.26	0.45%	12.13

Note: (1) Ocean freight unit price = ocean freight/27 tons; insurance unit price = export price CIF*110%*insurance rate;

(2) For relevant evidence on ocean freight and insurance rates, please see "Appendix VII: Data Source and Explanation of Ocean Freight and Insurance Rates".

As for the domestic link costs, the applicant currently has no reasonable channels to learn about the specific costs. The applicant temporarily adjusts the CIF export price based on the domestic link costs of EU export trade announced by the World Bank Group (including preparation of documents, customs clearance costs, domestic transportation costs, etc.). According to the domestic link costs of export reported by the World Bank Group, the domestic link costs of EU exports per ton of products are US\$31.77 (please refer to "Annex 8: World Bank Group's report on EU trade link costs").

Therefore, this item is adjusted as follows:

Unit: USD/ton

Country (Region)	Exports before adjustment Price (CIF)	Adjustment of sales conditions and trade links			This adjusted Export price
		Less: Ocean freight unit price	Less: Insurance premium unit price	Less: Domestic costs	
European Union	2,451.29	59.26	12.13	31.77	2,348.13

2.3 Adjustments to sales volume and other aspects such as physical characteristics

Since the quantity of relevant pork and pork by-products produced by the EU and exported to China is representative and comparable, and their physical and chemical properties are basically the same, this adjustment should not be considered for the time being.

3. Adjusted export prices

After the above adjustments, the adjusted export price is:

Unit: USD/ton

period	Country (Region)	Adjusted export price
2023	European Union	2,348.13

(III) Application for investigation of the normal value of the product

1, Normal value before adjustment

Due to limited information, the applicant is unable to obtain the actual transaction price of the relevant pork and pork by-products in the EU market. In accordance with the provisions of Article 4, paragraph 2 of the Anti-dumping Regulations, the applicant temporarily uses the export price of the relevant pork and pork by-products from the EU to the largest Asian exporter (Japan) outside of China as the normal value of the relevant pork and pork by-products from the EU before adjustment.

Unit: USD/ton

period	Country (Region)	Normal value before adjustment
2023	European Union	3,909.69

Note: For data sources, please see Appendix 9: "Normal value information of products under investigation" .

2, price adjustment

According to the law, with regard to price adjustment and price comparison, the applicant shall make appropriate adjustments to the normal value and export price in terms of sales conditions, taxes, trade links, quantity, physical characteristics, etc. When comparing the normal value and export price, it shall be done as much as possible at the same trade link, at the same time of sale, and before ex-factory.

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

2.1 Adjustment of sales conditions and trade links

For the purpose of calculating the dumping margin, the Applicant compares the normal value and the export price on the basis of the ex-factory price. Since the normal value of the above-mentioned EU pork and pork by-products obtained by the Applicant is the FOB export price, in order to compare it on the same level as the export price, the EU export domestic link costs should be deducted on this basis.

Regarding the domestic export costs, the applicant will temporarily make adjustments based on the domestic export costs to the EU as described in the export price adjustment section above.

Therefore, the domestic export fees for relevant pork and pork by-products from the EU are adjusted as follows:

Unit: USD/ton

period	Normal value before adjustment	Less: Domestic export costs	Adjusted Normal Value
2023	3,909.69	31.77	3,877.93

2.2 Tax Adjustment

Since the normal value before adjustment is the FOB export price, excluding customs duties and VAT, this adjustment should not be taken into account.

2.3 Adjustments to physical characteristics and other aspects

According to the applicant's preliminary understanding, the physical and chemical properties of the relevant pork and pork by-products produced in the EU are basically the same as those of the relevant pork and pork by-products exported to third countries and China. This adjustment should not be considered for the time being.

3, Adjusted Normal Value

Unit: USD/ton

2023	Adjusted Normal Value
European Union	3,877.93

(IV) Estimated dumping margin

Unit: USD/ton

2023	European Union
Export price (CIF)	2,451.29
Export price (adjusted)	2,348.13
Normal value (adjusted)	3,877.93
Absolute amount of dumping*	1,529.80
Dumping Margin**	62.41%

Note: (1) Absolute amount of dumping* = normal value (after adjustment) - export price (after adjustment);

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

VI. Damage to domestic industries

1. Cumulative evaluation

The origin and export country (region) of the products involved in the case applied by the applicant this time is only one country (region) in the European Union, and the issue of cumulative assessment is not applicable to this application.

(II) Application for investigation of changes in import volume and price of products and the status of the domestic industry

1. Changes in the quantity of products under investigation

1.1 Changes in the absolute import volume of the products under investigation

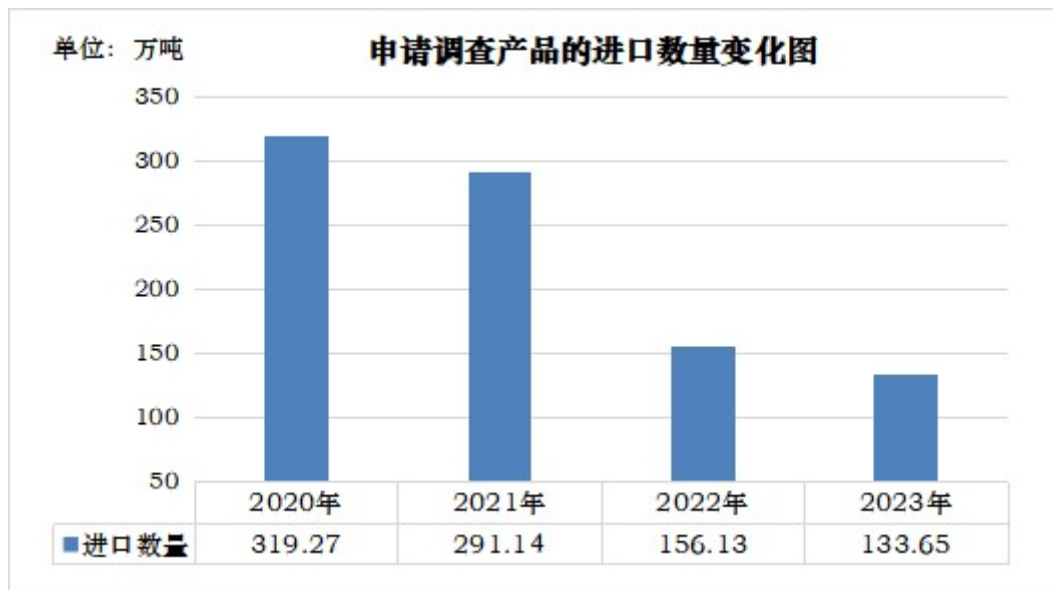
Table of changes in import quantity of products under investigation

Quantity unit: tons

period	Country (Region)	Import quantity	The proportion of quantity	Quantity change range
2020	China's total imports	5,732,170	100.00%	-
	European Union	3,192,691	55.70%	-
2021	China's total imports	5,001,961	100.00%	-12.74%
	European Union	2,911,368	58.20%	- 8.81%
2022	China's total imports	2,859,897	100.00%	- 42.82%
	European Union	1,561,304	54.59%	- 46.37%
2023	China's total imports	2,708,111	100.00%	- 5.31%
	European Union	1,336,533	49.35%	- 14.40%

Note:(1) For the data source of the above table, please refer to Appendix 6: "Statistics of relevant pork and pork by-products import and export data in my country";

(2) quantity = import quantity of the product under investigation / total import quantity of similar products in China.



The data in the above charts show that from 2020 to 2023, the average annual proportion of products subject to investigation in China's total imports of similar products will be 54%, constituting the main part of China's total imports of similar products.

In terms of absolute import volume, the import volume of the products under investigation from 2020 to 2023 will be 3.1927 million tons, 2.9114 million tons, 1.5613 million tons and 1.3365 million tons. From 2020 to 2023, the average annual import volume of the products under investigation will reach 2.25 million tons.

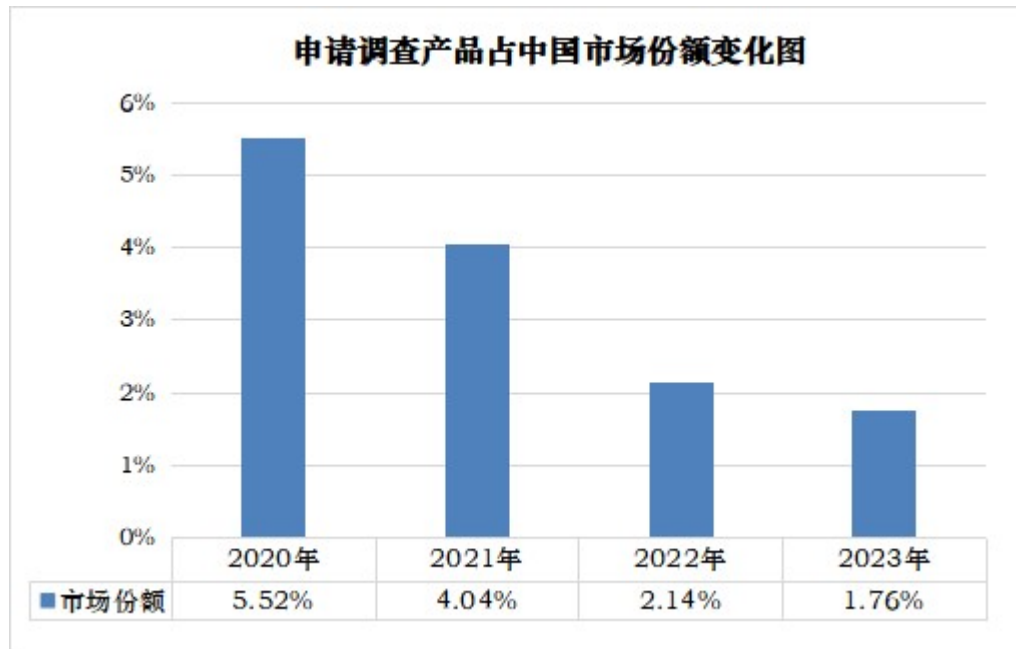
1.2 Changes in the relative import volume of the products under investigation

Apply to investigate changes in the market share of products in China

Quantity unit: 10,000 tons

period	Apply for product survey	Domestic similar products	Apply for product survey	Share increase or decrease
	Import quantity	Demand	market share	percentage point
2020	319.27	5,779.04	5.52%	-
2021	291.14	7,205.15	4.04%	- 1.48
2022	156.13	7,300.39	2.14%	- 1.90
2023	133.65	7,606.42	1.76%	- 0.38

Note: Market share = import quantity of the product under investigation / domestic demand.



As shown in the above chart, from 2020 to 2023, the Chinese market share of the products under investigation will be 5.52%, 4.04%, 2.14% and 1.76% respectively, with an average annual share of 3.37%.

2. The impact of the product under investigation on the prices of similar products in the domestic industry

2.1 Application for Investigational ProductsCIFChanges in import prices

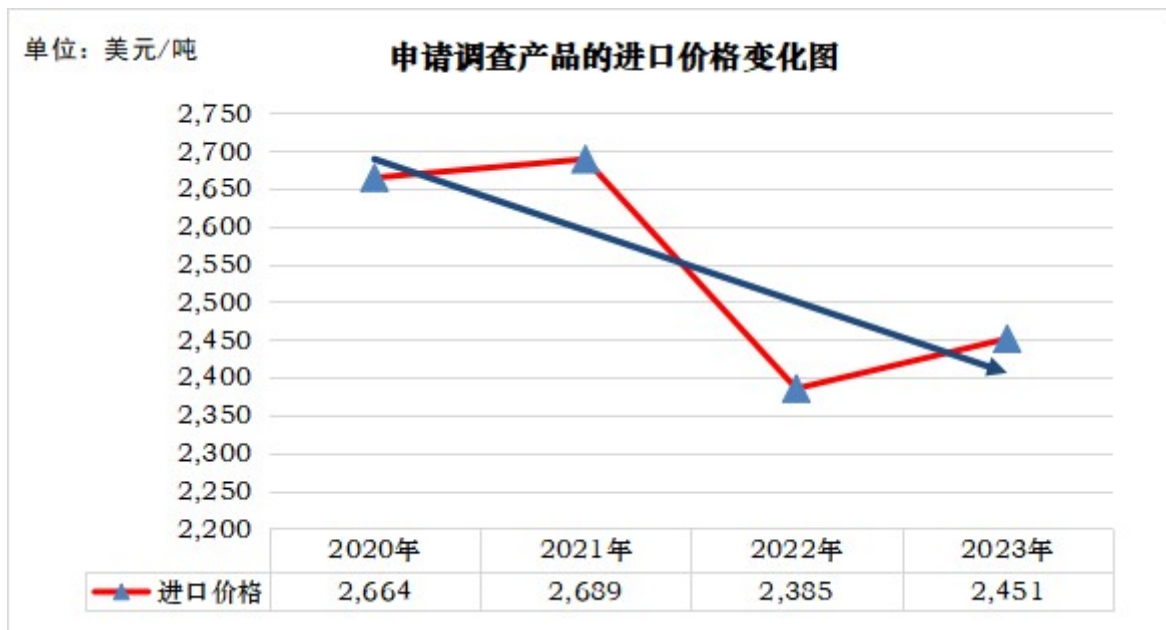
Apply for product survey CIF Changes in import prices

Unit: Ton, USD, USD/ton

period	Import quantity	Import amount	Import price	Price change
2020	3,192,691	8,506,768,459	2,664.45	-
2021	2,911,368	7,828,486,996	2,688.94	0.92%
2022	1,561,304	3,724,065,418	2,385.23	-11.29%
2023	1,336,533	3,276,222,603	2,451.29	2.77%

Note:(1) For the data source of the above table, please refer to Appendix 6;

(2) Import price = import amount/import quantity.



As shown in the above chart, from 2020 to 2023, the import prices of the products under investigation were US\$2,664/ton, USD 2,689/ton, USD 2,385/ton and USD 2,451/ton, up 0.92% in 2021 compared with 2020, down 11.29% in 2022 compared with 2021, up 2.77% in 2023 compared with the previous year, and down 8% in 2023 compared with 2020.

2.2 The impact of the product under investigation on the price of similar domestic products

2.2.1 Market competition analysis between the product under investigation and similar domestic products

The applicant believes that there is a price competition relationship between the product under investigation and similar domestic products in the Chinese market. With the average annual import volume of the product under investigation reaching 2.25 million tons, the import volume and import price of the product under investigation have jointly had an adverse impact on the prices of similar domestic products:

First, according to the applicant's understanding, there are more than 5,000 domestic manufacturers of similar products, the industry is highly fragmented, and the average domestic market share of a single domestic enterprise is only about 0.02%.

Second, from the perspective of industry characteristics, on the one hand, pork, as the main source of animal protein for Chinese residents, is a necessity for people's livelihood and a "basket of goods" product closely related to people's lives. Downstream users and consumers are very sensitive to the prices of pork and pork by-products; on the other hand, pork and pork by-products are homogeneous bulk agricultural products with large demand, small product differences, and prices that follow market trends. Competition is very fierce, and operators have no pricing power and weak bargaining power. The price of the product plays a very important role in whether downstream users and consumers buy it.

Third, since 2020, my country's sow inventory, pig inventory, slaughter volume and other indicators and data have generally increased and have remained at a high level. The domestic pig demand has gradually shifted from insufficient supply to a basic balance between supply and demand, and even a phased oversupply market structure has emerged in the later period, resulting in a long-term high supply of domestic pork and pork by-products. As a necessary consumer product, pork has relatively rigid demand. The change from basic balance to oversupply will further make the price of pork and pork by-products very sensitive to "supply" fluctuations. Even if the market supply increases a little, it will have a significant negative impact on the market price.

Fourth, in the industrial situation and market supply and demand environment where the domestic industry is very fragmented, users and consumers are highly sensitive to prices, and market prices are very sensitive to fluctuations in supply, even relatively small changes in supply can have an impact on the overall market price. For this case, the annual import volume of the product under investigation averages 2.25 million tons, accounting for an average of 3.37% of the Chinese market share, which is large enough compared to the average share of about 0.02% for a single domestic enterprise. Such import volume and market share are sufficient to have an impact on the domestic market relative to the characteristics of the domestic industry and the market supply and demand environment.

Fifth, as we all know, the number of sows in stock is an important indicator for measuring pig and pork production capacity and calculating normal supply relations. In March 2024, the Ministry of Agriculture and Rural Affairs issued the "Implementation Plan for Swine Production Capacity Regulation (Revised in 2024)". According to the plan, the normal number of sows in my country will be adjusted from 41 million to 39 million, and 2 million sows will be eliminated. In the case of deep losses in the entire industry in 2023, in order to maintain a healthy and stable supply and demand of pork nationwide, only 2 million sows will be eliminated. If the annual average import volume of the product applied for investigation is converted to the normal target of 41 million sows from 2020 to 2023, 3.37% of the sow production capacity is about 1.4 million sows, which is by no means a small number compared to the 2 million eliminations. The impact of such a number on the supply and price of domestic pigs, pork and pig by-products is very obvious. In fact, as mentioned above, according to public information, the four major pig breeding companies, New Hope, Zhengbang Technology, Tianbang Food, and Aonong Bio, have eliminated a total of only 1.49 million sows in more than two years from the end of 2021 to 2024.

Sixth, the impact of the import quantity and price of the products under investigation are intertwined and work together. The level and trend of the import price of the products under investigation will have an impact on the prices of similar domestic products. As described below, from 2020 to 2023, the export pricing of the products under investigation to China was significantly low. From the price comparison of different specifications and models, the import RMB price of the products under investigation, whether pork or pork by-products, is significantly lower than that of similar domestic products, with a price reduction of about 20%-50%. Moreover, according to the preliminary calculations of the applicant, the dumping margin of the products under investigation to China is as high as more than 60%.

Due to the high sensitivity of users and consumers to changes in market prices, dealers or downstream customers will inevitably refer to the prices of the products under investigation, which account for more than half of China's total imports of similar products, when deciding whether to purchase similar domestic products. Such a huge dumping margin and reduction margin of the products under investigation, coupled with the high import volume, will inevitably lower the prices of similar domestic products, aggravate the domestic oversupply situation, prolong and intensify the time and degree of price decline, and aggravate the losses of the industry. The applicant further explains with specific data as follows:

2.2.2 The product under investigation has caused price reduction for similar products in the domestic industry

Price comparison between the product under investigation and similar domestic products

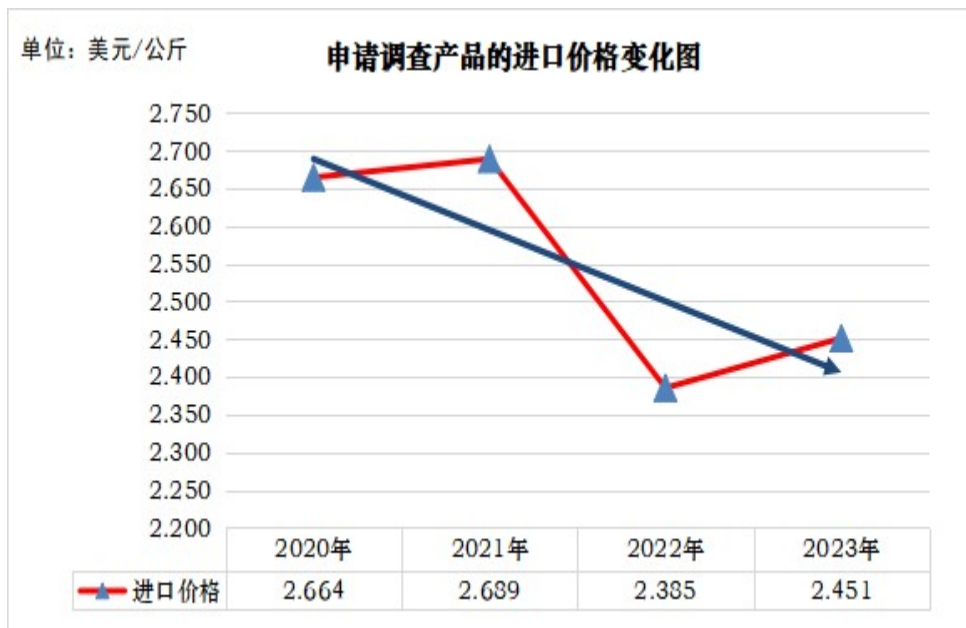
Unit: USD/kg, Yuan/kg

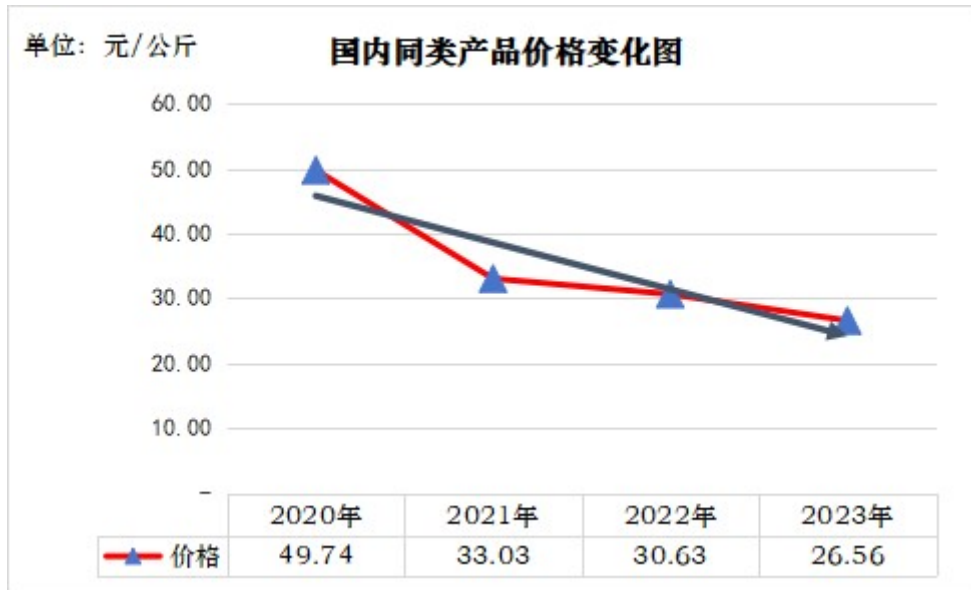
period	Apply for investigation of product import price	Range of change	Similar product prices	Range of change
2020	2.664	-	49.74	-
2021	2.689	0.92%	33.03	- 33.59%
2022	2.385	-11.29%	30.63	-7.26%
2023	2.451	2.77%	26.56	- 13.31%

Note: (1) For the import prices of the products under investigation, please refer to Annex 6;

(2) For the prices of similar domestic products, please refer to the following section "The impact of the product under investigation on relevant economic indicators or factors of domestic industries"

Relevant part.





As mentioned above, the products under investigation have an impact on the prices of similar products in the domestic industry. The above chart shows that the overall trend of the import prices of the products under investigation is basically the same as that of the prices of similar products in the domestic industry. Compared with 2020, the import prices of the products under investigation have dropped by 8% in 2023, and the prices of similar products in the domestic industry have dropped by nearly 47%. The import prices of the products under investigation have depressed the prices of similar products in the domestic industry.

2.2.3 The product under investigation has caused a significant price reduction on similar domestic products

According to Chinese customs statistics, the main specifications of the products exported by the EU to China include pork and pork by-products. In order to further illustrate the impact of the products under investigation on the prices of similar domestic products, the applicants compared the prices of these two specifications of products:

(1) Price comparison table of the product under investigation and similar domestic products - Pork

Price unit: Yuan/kg

period	Apply for investigation of the RMB price of imported products	Domestic prices of similar products	Price Difference	Reduction
2020	21.34	48.50	- 27.17	56%
2021	19.70	30.95	- 11.25	36%
2022	16.36	28.06	- 11.70	42%
2023	17.67	23.77	- 6.10	26%

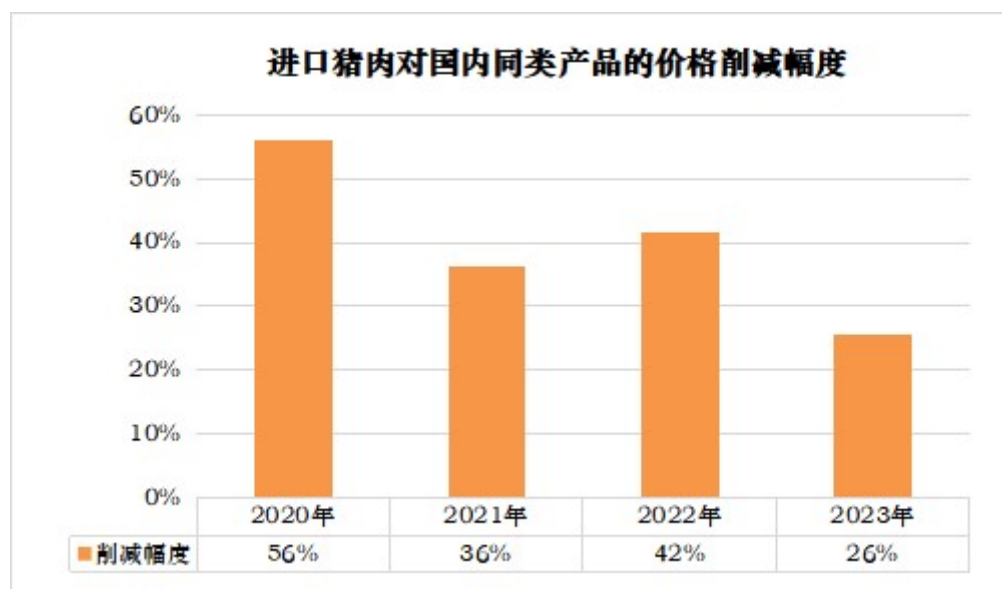
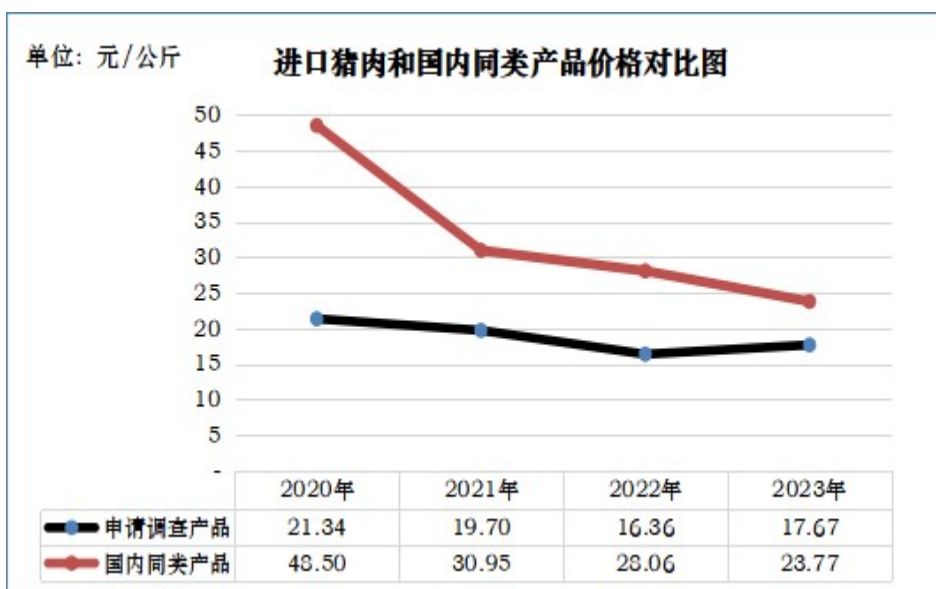
Note: (1) The products under investigation in the above table are tariff numbers 02031110, 02031190, 02031200, 02031900, 02032110, 02032190,

Statistics under 02032200 and 02032900 are from Annex VI;

(2) RMB import price of the product under investigation = USD import amount × (1+Import tariff rate) × US Dollar to Chinese Yuan

Exchange rate)/import quantity. The exchange rate is from the People's Bank of China. For details, please refer to "Appendix 11: Exchange Rate Table"; (3) For the prices of similar products in the domestic industry, please refer to Appendix 10, excluding value-added tax;

(4) Price difference = RMB import price of the product under investigation – price of similar products in the domestic industry.



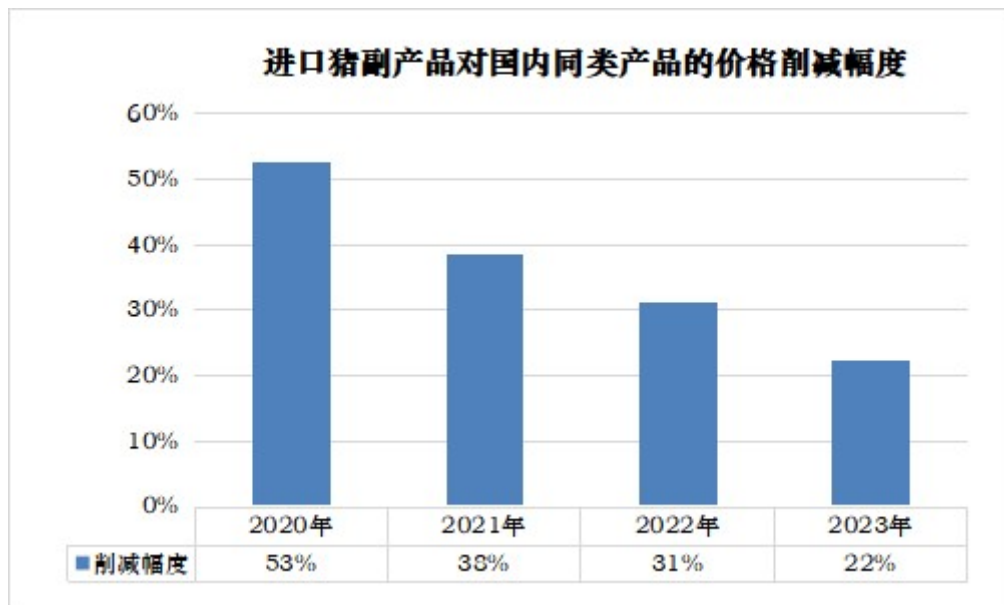
(2) Price comparison table of the product under investigation and similar domestic products - pig by-products

Price unit: Yuan/kg

period	Apply for investigation of the RMB price of imported products	Domestic prices of similar products	Price Difference	Reduction
2020	16.61	35.04	- 18.43	53%
2021	17.17	27.89	- 10.72	38%
2022	19.47	28.27	- 8.79	31%
2023	20.66	26.61	- 5.95	twenty two%

Note: Data sources and calculation methods are the same as above. The products under investigation in the above table are tariff numbers 02063000, 02064100, 02064900, 02091000,

Statistics under 05040011 and 05040014.



From the above chart data, it can be seen that from 2020 to 2023, the import prices of the two specifications of the products under investigation have always been significantly lower than the prices of similar products in the domestic industry. From 2020 to 2023, pork was 27.17 yuan, 11.25 yuan, 11.70 yuan and 6.10 yuan lower per kilogram, with price reductions of 56%, 36%, 42% and 26% respectively; pig by-products were 18.43 yuan, 10.72 yuan, 8.79 yuan and 5.95 yuan lower per kilogram, with price reductions of 53%, 38%, 31% and 22% respectively. It can be seen that the products under investigation have caused significant price cuts for similar products in the domestic industry.

To sum up, the import price of the products under investigation has already depressed and reduced the prices of similar products in the domestic industry, which in turn has had an adverse impact on the profit-creating ability of similar products in the domestic industry. The operating efficiency of similar products in the domestic industry has been significantly negatively affected and damaged (see the analysis and explanation in the section "The impact of the products under investigation on relevant economic indicators or factors of the domestic industry" below for details).

3. Apply for an investigation into the impact of the product on relevant economic indicators or factors of domestic industries

According to the law, when analyzing the impact of dumped imports on relevant economic factors and indicators of domestic industries, it mainly includes a comprehensive assessment of all relevant economic factors and indexes of the domestic industry situation, including actual or potential changes, such as output, sales, market share, profits, investment returns, operating rates, prices, employment, wages, capital raising or investment capabilities and other indicators and factors.

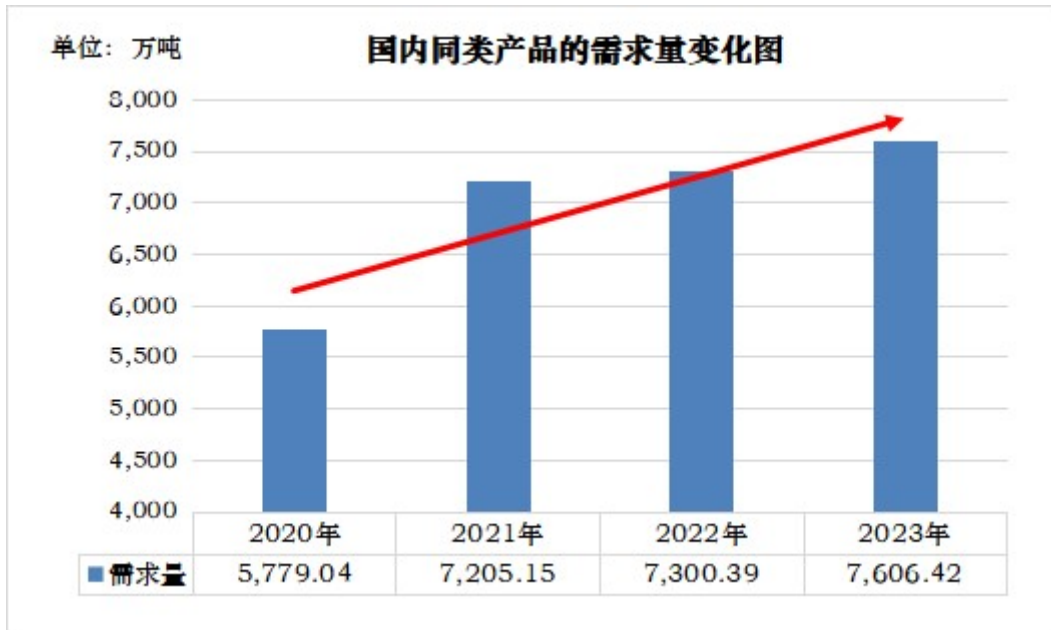
As mentioned above, there are as many domestic enterprises producing similar products. There are more than 100 companies, which are very scattered. The applicant has great difficulties in collecting and compiling relevant economic indicators of domestic similar product production enterprises that account for the majority of the total domestic similar product output. Therefore, when analyzing the impact of the application investigation product on the relevant economic factors and indicators of similar products in the domestic industry below, unless otherwise specified, the data on various economic factors and indicators of the domestic industry are all published by the relevant authoritative departments that the applicant can currently reasonably obtain, or the total or average data of similar products in the entire domestic industry calculated based on the data published by the relevant authoritative departments.

The industrial damage investigation period applied by the applicant is from January 1, 2020 to December 31, 2023. In the following analysis of the impact of dumped imported products on relevant economic factors and indicators of similar products in the domestic industry, this application evaluates the changing trends of economic indicators and factors such as production, sales volume, market share, inventory, sales revenue, price, and profit of similar products from 2020 to 2023. Through this analysis and evaluation, the applicant believes that due to the large-scale low-price dumping of the products under investigation, the relevant pork and pig by-product industries in China have suffered substantial damage.

3.1 Changes in domestic demand for similar products**Changes in domestic demand for similar products**

Quantity unit: 10,000 tons

period	China Demand	Range of change
2020	5,779.04	-
2021	7,205.15	24.68%
2022	7,300.39	1.32%
2023	7,606.42	4.19%



As shown in the above chart, from 2020 to 2023, the domestic demand for related pork and pork by-products will continue to grow, which will be 57.7904 million tons, 72.0515 million tons, 73.0039 million tons and 76.0642 million tons from 2020 to 2023, respectively. From 2021 to 2023, it will increase by 24.68%, 1.32% and 4.19% respectively compared with the previous year, and in 2023, it will increase by 31.62% compared with 2020.

Under the favorable market background of continuous growth in demand, similar products in the domestic industry should have achieved good development. However, as described below, the large amount of low-priced imports of the products under investigation have had a significant impact on the operating efficiency of the domestic industry.

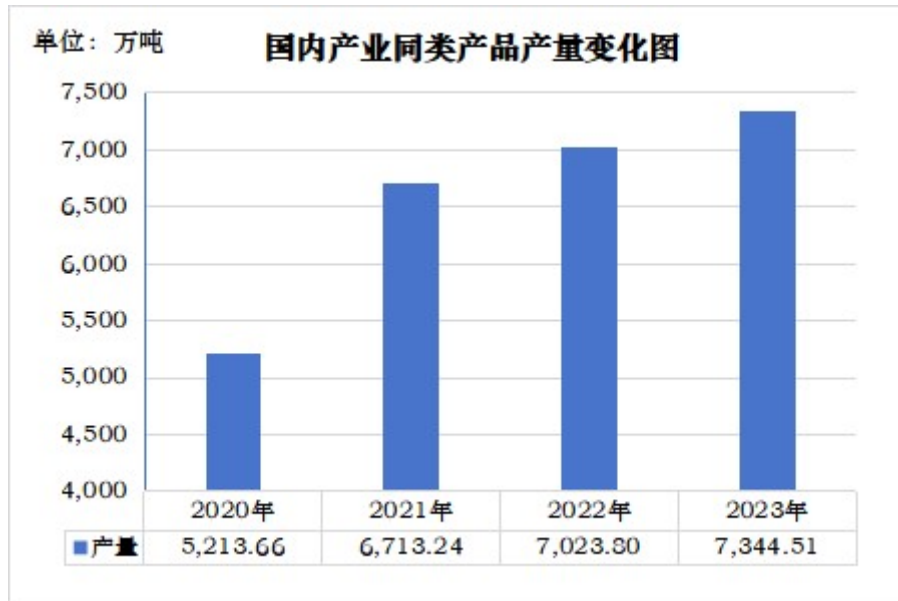
3.2 Changes in the output of similar products in the domestic industry

Changes in the output of similar products in the domestic industry

Quantity unit: 10,000 tons

period	Yield	Range of change
2020	5,213.66	-
2021	6,713.24	28.76%
2022	7,023.80	4.63%
2023	7,344.51	4.57%

Note: The data in the above table is from Appendix 4: "Explanation on the relevant production and operation data of similar domestic products" .



In order to meet the growing market demand for pork products, the output of similar products in the domestic industry has also shown an upward trend from 2020 to 2023. From 2020 to 2023, the output was 52.1366 million tons, 67.1324 million tons, 70.2340 million tons and 73.4451 million tons, respectively, an increase of 28.76%, 4.63% and 4.57% from 2021 to 2023 compared with the previous year.

However, due to the adverse impact of the EU's large-scale, low-price dumping of the products under investigation in the Chinese market, the expansion of the scale of similar products in the domestic industry has not brought corresponding economies of scale and profits. On the contrary, as described below, since 2021, the profitability of similar products in the domestic industry has been greatly reduced, and the losses have gradually expanded.

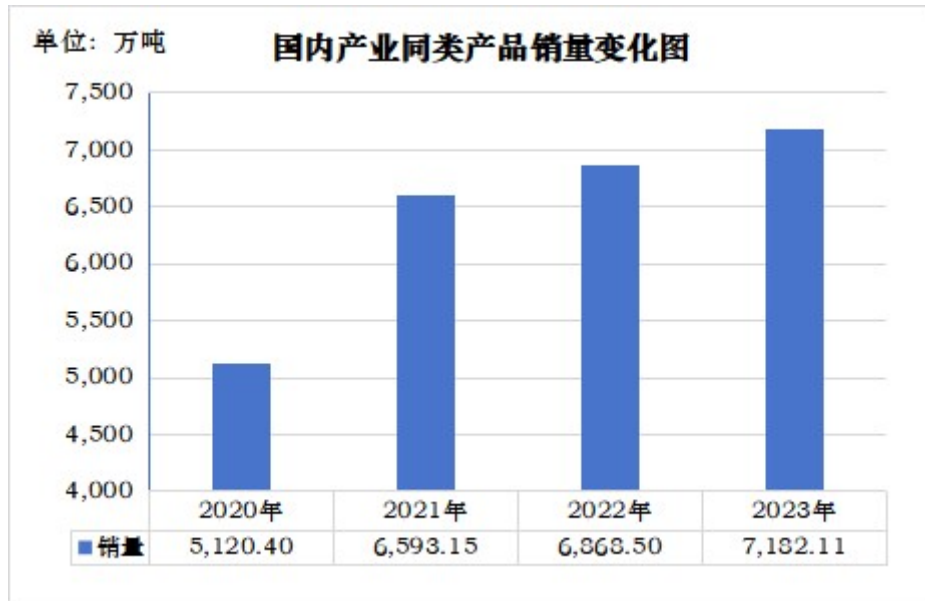
3.3 Changes in sales volume of similar products in the domestic industry

Changes in sales volume of similar products in the domestic industry

Unit: 10,000 tons

period	Sales	Range of change
2020	5,120.40	-
2021	6,593.15	28.76%
2022	6,868.50	4.18%
2023	7,182.11	4.57%

Note: The data in the above table are from Appendix 4.



The above chart shows that with the expansion of the industry scale, the sales volume of similar products in the domestic industry has also shown a continuous growth trend. From 2020 to 2023, the sales volume was 51,204 million tons, 65,931.5 million tons, 68,685 million tons and 71,821.1 million tons, respectively, and from 2021 to 2023, it increased by 28.76%, 4.18% and 4.57% respectively compared with the previous year.

During the application investigation period, although the sales volume of similar products in the domestic industry showed a continuous growth trend, the growth in sales volume of similar products not only failed to bring corresponding economies of scale and profits to the domestic industry, on the contrary, due to the price suppression and reduction of the products applied for investigation, the domestic industry could only maintain a certain sales volume at the expense of prices and profits, resulting in a sharp decline in the profits of similar products in the domestic industry in 2021 and turning into losses, and the amount of losses has gradually expanded.

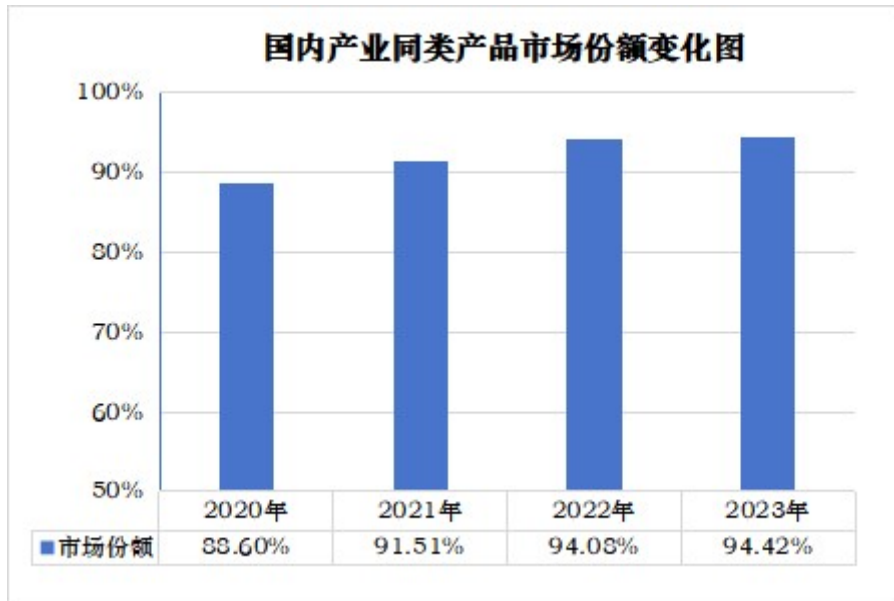
3.4 Changes in market share of similar products in the domestic industry

Changes in market share of similar products in the domestic industry

Quantity unit: 10,000 tons

period	Sales	Demand	market share	Share increase/decrease percentage points
2020	5,120.40	5,779.04	88.60%	-
2021	6,593.15	7,205.15	91.51%	2.90
2022	6,868.50	7,300.39	94.08%	2.58
2023	7,182.11	7,606.42	94.42%	0.34

Note: Market share = sales volume/demand volume.



The above chart shows that, similar to the trend of sales volume, the market share of similar products in the domestic industry is also on the rise. From 2020 to 2023, the market share was 88.60%, 91.51%, 94.08% and 94.42% respectively, and from 2021 to 2023, it increased by 2.90 percentage points, 2.58 percentage points and 0.34 percentage points respectively compared with the previous year.

3.5 Changes in the End-of-Period Inventory of Similar Products in Domestic Industries

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

Quantity unit: 10,000 tons

period	Ending inventory	Range of change
2020	93.27	-
2021	120.09	28.76%
2022	155.30	29.32%
2023	162.40	4.57%

Note: The data in the above table are from Appendix 4.



The above chart shows that the end-of-period inventory of similar products in the domestic industry has continued to rise. From 2020 to 2023, the inventory was 932,700 tons, 1,200,900 tons, 1,553,000 tons and 1,624,000 tons, respectively, and from 2021 to 2023, it increased by 28.76%, 29.32% and 4.57% respectively compared with the previous year.

3.6 Changes in sales revenue of similar products in the domestic industry

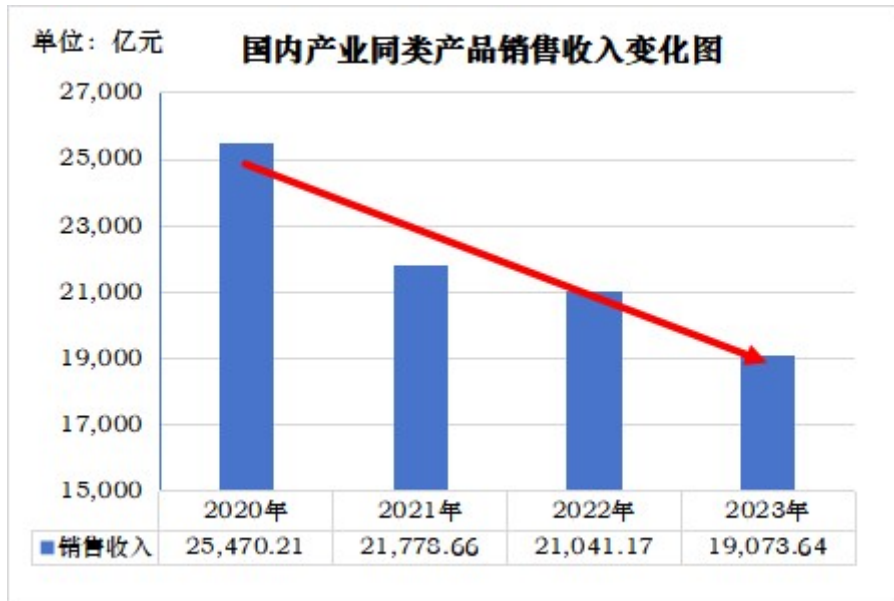
Changes in sales revenue of similar products in the domestic industry

Unit: 100 million yuan

period	Sales revenue	Range of change
2020	25,470.21	-
2021	21,778.66	- 14.49%
2022	21,041.17	- 3.39%
2023	19,073.64	- 9.35%

Note: The sales revenue in the above table is the combined sales revenue of pork and pork by-products.

The sales revenue of pork = the sales volume of pork × The price of pork, the sales revenue of pork by-products = the sales volume of pork by-products × Prices of pork by-products. Please refer to Appendix 4 for the sales sources of pork and pork by-products, and to Appendix 10 for the prices of pork and pork by-products.



The above chart shows that: although the sales volume of similar products in the domestic industry is on the rise, the sales revenue of similar products in the domestic industry has continued to decline due to the adverse impact of the continuous decline in prices. From 2020 to 2023, the revenues were RMB 2,547.021 billion, RMB 2,177.866 billion, RMB 2,104.117 billion and RMB 1,907.364 billion, respectively, and from 2021 to 2023, they decreased by 14.49%, 3.39% and 9.35% respectively compared with the previous year.

3.7 Changes in prices of similar products in the domestic industry

Price changes of similar products in the domestic industry

Unit: Yuan/kg

period	price	Range of change
2020	49.74	-
2021	33.03	- 33.59%
2022	30.63	-7.26%
2023	26.56	- 13.31%

Note: Price = sales revenue/sales volume.



The above chart shows that the prices of similar products in the domestic industry have continued to decline sharply. From 2020 to 2023, the prices were 49.74 yuan/kg, 33.03 yuan/kg, 30.63 yuan/kg and 26.56 yuan/kg, respectively. From 2021 to 2023, the prices decreased by 33.59%, 7.26% and 13.31% respectively compared with the previous year.

As prices are suppressed and reduced by the prices of the products under investigation, the profits of similar products in the domestic industry have been significantly adversely affected.

3.8 Changes in profits of similar products in the domestic industry

Changes in profits of similar products in the domestic industry

period	Unit profit (yuan/kg)	Total profit (100 million yuan)
2020	0.10	51.76
2021	- 0.31	- 204.57
2022	- 0.33	- 226.22
2023	- 0.40	- 284.22

Note: The data in the above table are from Appendix 4.



The above chart shows that due to the adverse impact of the continued decline in prices and incomes, the profitability of similar products in the domestic industry continued to decline from 2020 to 2023, turning from profit in the previous year to loss in 2021, and the amount of losses continued to expand.

From 2020 to 2023, the unit profits of similar products in the domestic industry will be 0.10 yuan/kg, -0.31 yuan/kg, -0.33 yuan/kg and -0.40 yuan/kg respectively, and the total profits will be 5.176 billion yuan, -20.457 billion yuan, -22.622 billion yuan and -28.422 billion yuan.

(III) Extent and type of damage

The above analysis and explanations show that, under the favorable background of sustained growth in domestic market demand, due to the impact of large-scale, low-price dumping of imported products under investigation, the relevant economic indicators of similar products in the domestic industry have deteriorated to varying degrees.

The specific manifestations are:

1. In order to adapt to the growing market demand, the output, sales volume and market share of similar products in the domestic industry will show an upward trend from 2020 to 2023. However, the growth in the output, sales and share of similar products has not brought corresponding economies of scale and profits to the domestic industry.

2. From 2020 to 2023, the end-of-period inventory of similar products in the domestic industry showed a continuous upward trend. From 2021 to 2023, it increased by 28.76%, 29.32% and 4.57% respectively compared with the previous year.

3. The prices of similar products in the domestic industry have been suppressed and reduced, and are showing a continuous downward trend. From 2021 to 2023, prices fell by 33.59%, 7.26% and 13.31% respectively compared with the previous year.

4. The sales revenue of similar products in the domestic industry also continued to decline. From 2021 to 2023, the sales revenue of similar products in the domestic industry decreased by 14.49%, 3.39% and 9.35%.

5. Affected by the adverse effects of the continuous decline in prices and income, the profitability of similar products in the domestic industry continued to decline from 2020 to 2023, turning from profits in 2020 to continuous losses since 2021, and the amount of losses continued to expand. The unit profit continued to decline from 0.10 yuan/kg in 2020 to -0.40 yuan/kg in 2023, and the total profit also continued to decline from 5.176 billion yuan in 2020 to -28.422 billion yuan in 2023.

In summary, the applicant believes that under the impact of large-scale, low-price dumping of the products under investigation: on the one hand, during the investigation period, although the production, sales and market share of similar products in the domestic industry showed an upward trend, the growth of production and sales of similar products did not bring corresponding economies of scale and profits to the domestic industry. Moreover, the inventory of similar products showed a continuous upward trend.

On the other hand, as prices were depressed and cut by the products under investigation, the ability of similar products to create benefits was significantly negatively affected. During the entire application investigation period, prices, revenues, and profits of similar products in the domestic industry continued to decline. The entire industry has gone from profitability in 2020 to continuous losses since 2021, and the amount of losses has continued to expand.

Based on the above, the applicant believes that the production, operation and financial conditions of similar products in the domestic industry are deteriorating significantly. The large-scale, low-price dumping of the products under investigation is causing substantial damage to the domestic industry. If anti-dumping measures are not taken in a timely manner, the domestic industry will suffer even more serious damage.

VII. Causal Relationship between Dumping and Injury

(I) Analysis of the reasons why the product under investigation causes substantial damage to the domestic industry

my country has long been the world's largest pork producer and consumer. In recent years, my country's per capita pork consumption has maintained a steady growth trend, and its consumption is much higher than other animal products.

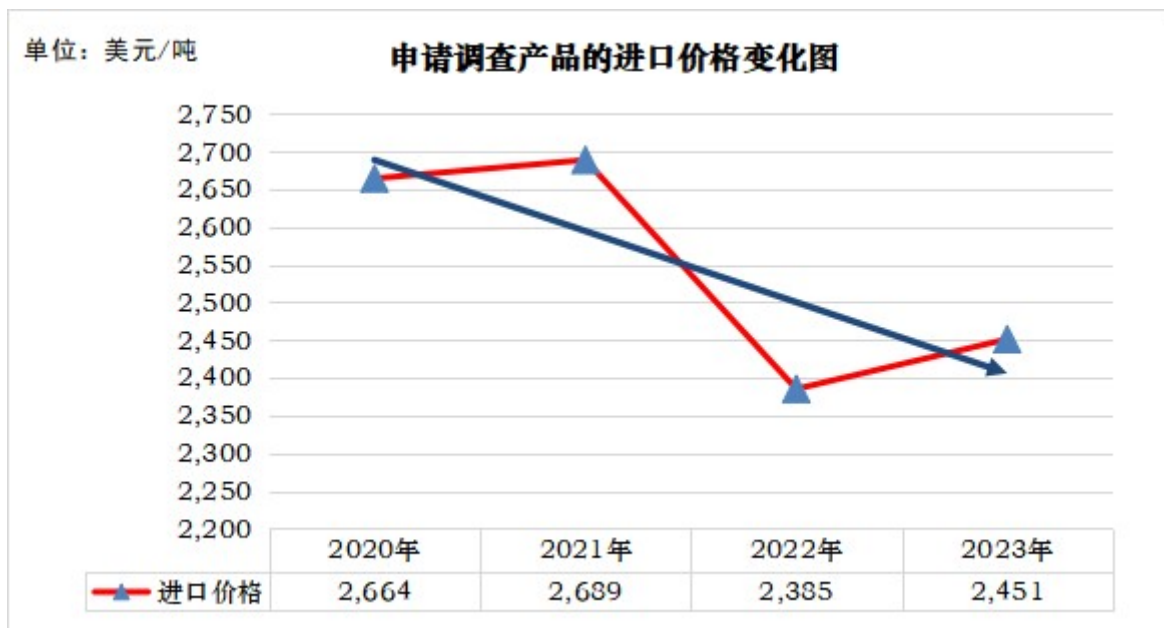
The demand for pork and pork by-products shows a continuous growth trend, with a cumulative increase of 31.61% in 2023 compared to 2020.

As the largest and most steadily growing pork consumption market, China has become the focus of attention of major pork and pork by-product producing countries (regions) around the world, including the EU. In recent years, EU pork and pork by-product manufacturers have resorted to low-price and price-cutting measures to dump large quantities of related products into the Chinese market.

Customs statistics show that from 2020 to 2023, the EU accounted for an average annual proportion of 54% of China's total imports of similar products, constituting the main part of China's total imports of similar products.

From 2020 to 2023, the import volume of the products under investigation was 3.1927 million tons, 2.9114 million tons, 1.5613 million tons and 1.3365 million tons respectively. From 2020 to 2023, the average annual import volume of the products under investigation reached 2.25 million tons. From 2020 to 2023, the market share of the products under investigation in China was 5.52%, 4.04%, 2.14% and 1.76% respectively, with an average annual share of 3.37%.

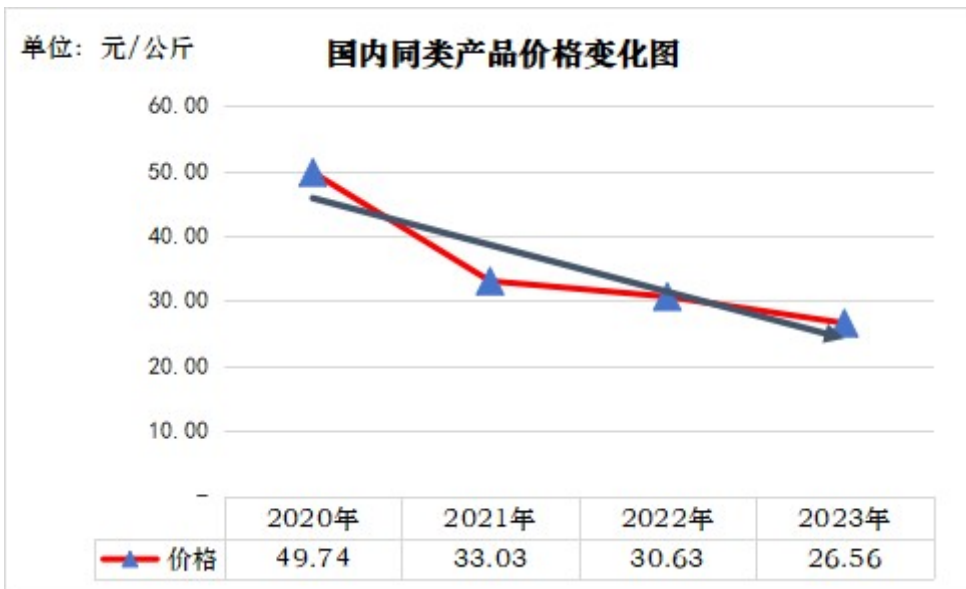
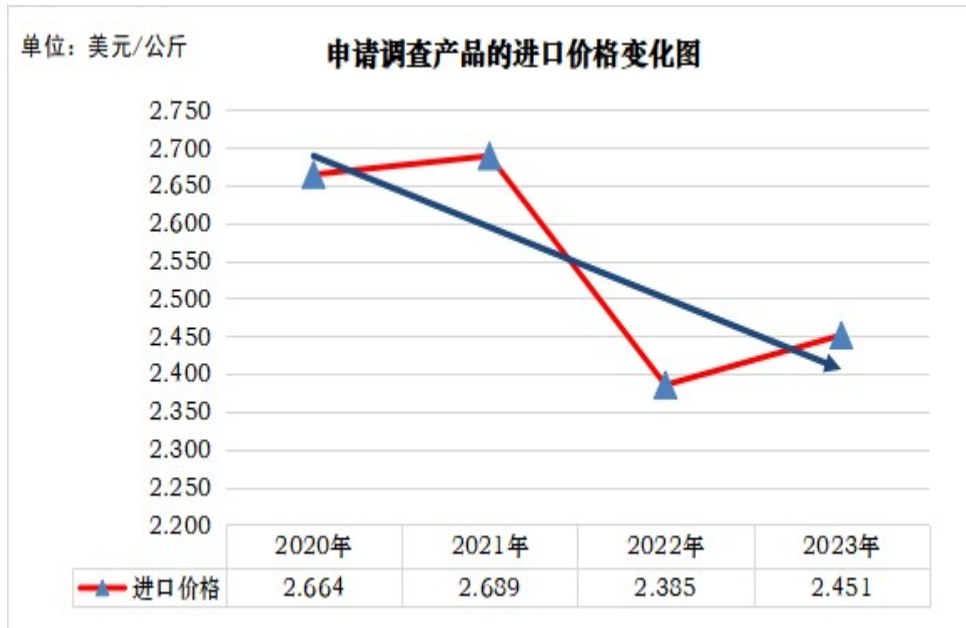
From 2020 to 2023, the weighted average import price of the products subject to investigation was US\$2,664/ton, US\$2,689/ton, 2,385 tons and US\$2,451/ton, respectively. In 2021, it increased by 0.92% compared with 2020, decreased by 11.29% in 2022 compared with 2021, and increased by 2.77% in 2023 compared with the previous year, and decreased by 8% in 2023 compared with 2020.



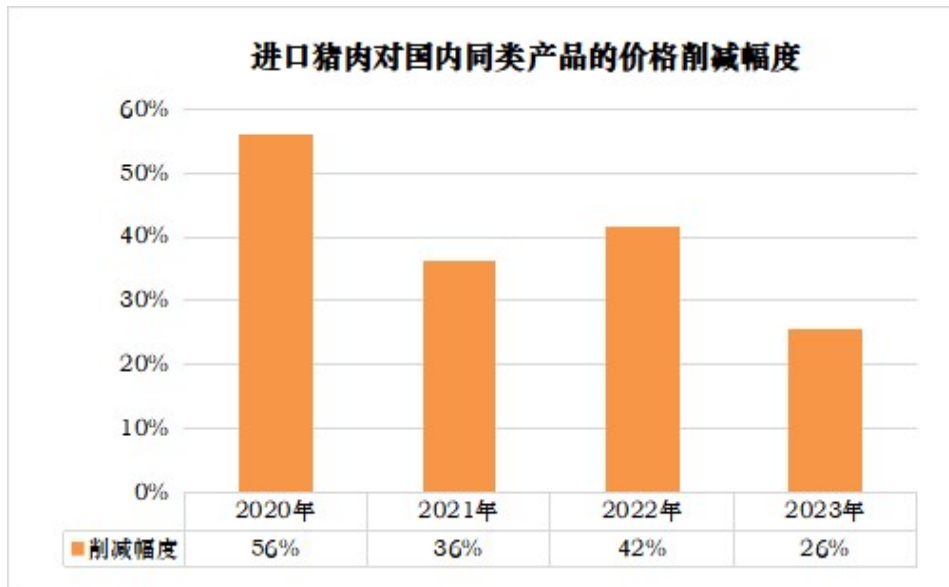
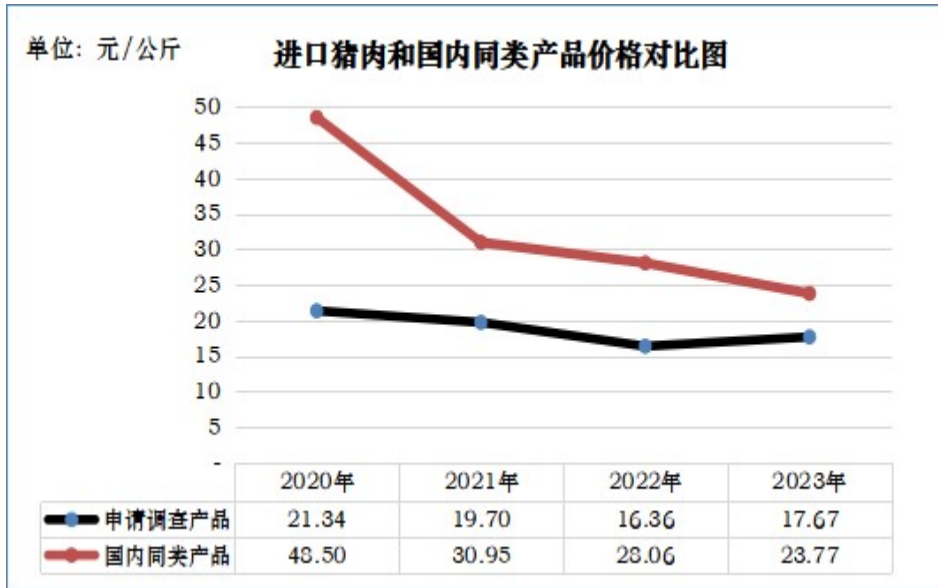
As mentioned above, the domestic industry is very fragmented, with downstream users and consumers being highly sensitive to prices, and market prices being very sensitive to fluctuations in supply. Even relatively small changes in supply can have an impact on the overall market price. For this case, the annual import volume of the product under investigation averages 2.25 million tons, accounting for an average of 3.37% of China's market share. This is large enough compared to the average share of about 0.02% for a single domestic enterprise and the normal number of domestic sows. Such import volume and market share are sufficient to have an impact on the domestic market relative to the characteristics of the domestic industry and the market supply and demand environment. Moreover, the impact of the import volume and price of the product under investigation are intertwined and work together. The level and trend of the import price of the product under investigation are

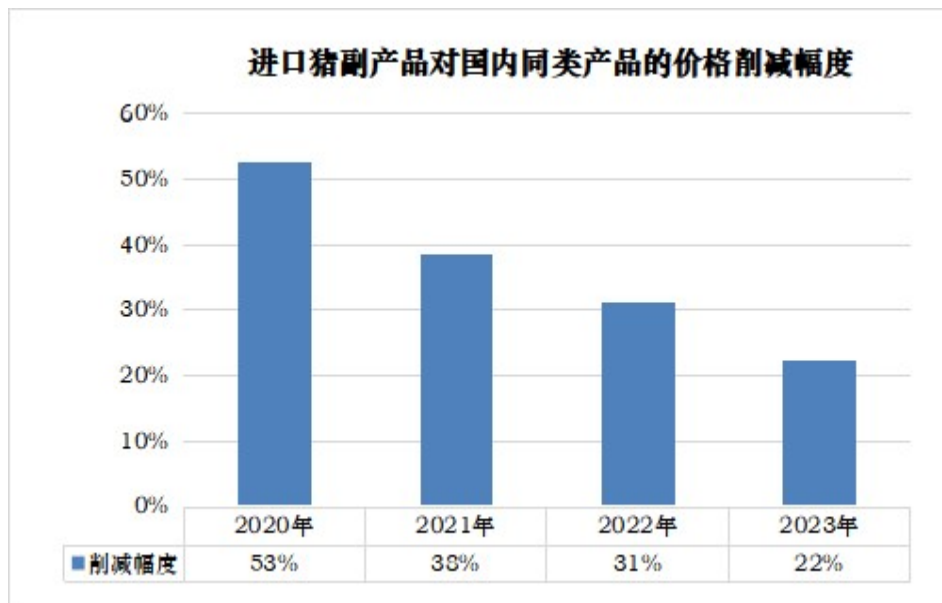
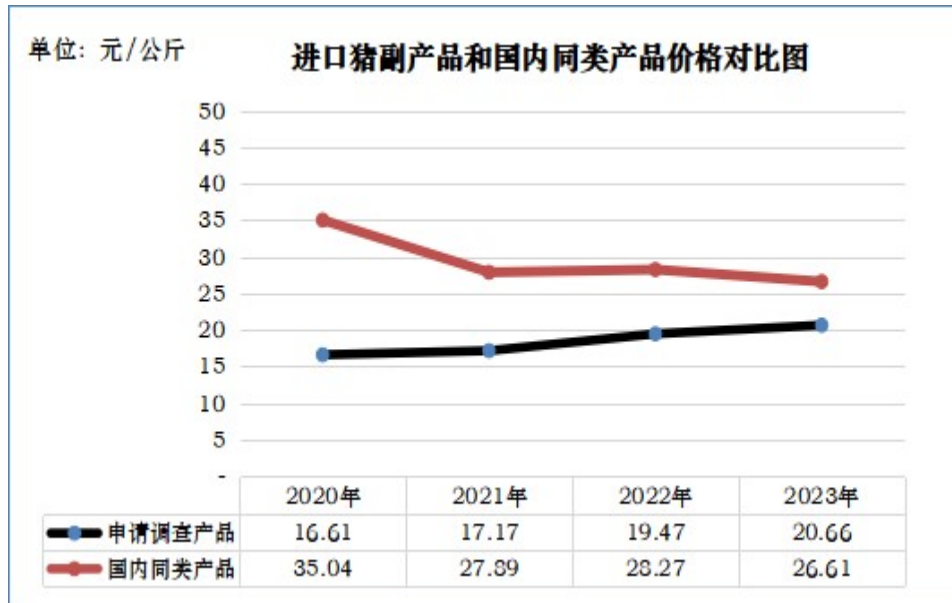
In addition, the high import volume will inevitably lower the prices of similar domestic products, aggravate the domestic oversupply situation, prolong and intensify the time and degree of price decline, and aggravate the industry's losses.

Evidence shows that the overall trend of import prices of the products under investigation is basically the same as that of similar products in the domestic industry. Compared with 2020, the import prices of the products under investigation fell by 8% in 2023, while the prices of similar products in the domestic industry fell by nearly 47%. The import prices of the products under investigation have depressed the prices of similar products in the domestic industry.



In addition, the products under investigation not only lower the prices of similar products in the domestic industry, but also cause significant price cuts on similar products in the domestic industry. From 2020 to 2023, the prices of the products under investigation for export to China are significantly lower than those of similar domestic products. From the comparison of prices by specifications and models, the import RMB prices of the products under investigation, whether pork or pork by-products, are significantly lower than those of similar domestic products, with a price cut of about 20%-50%. Moreover, the dumping margin of the products under investigation for export to China is as high as more than 60%.



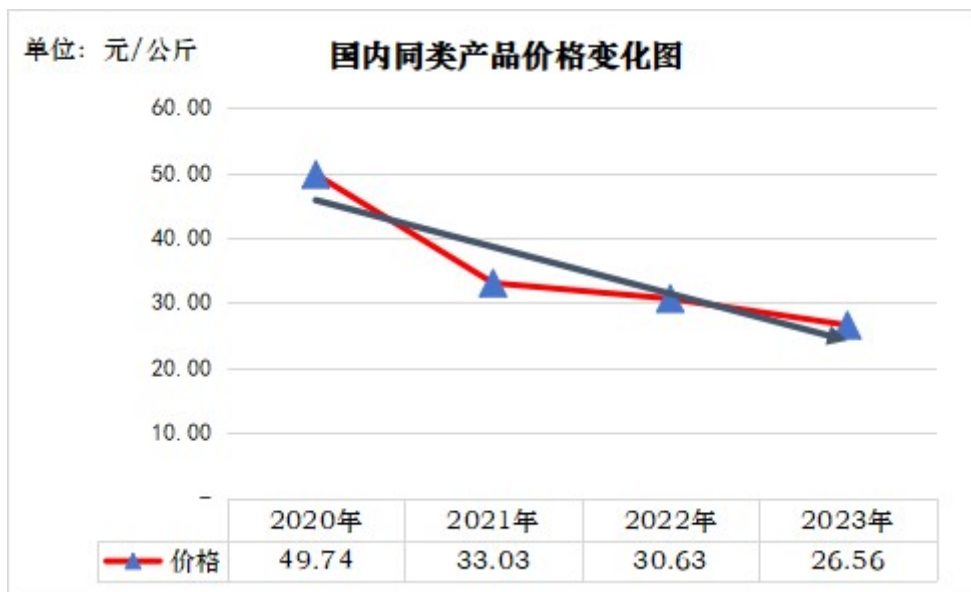


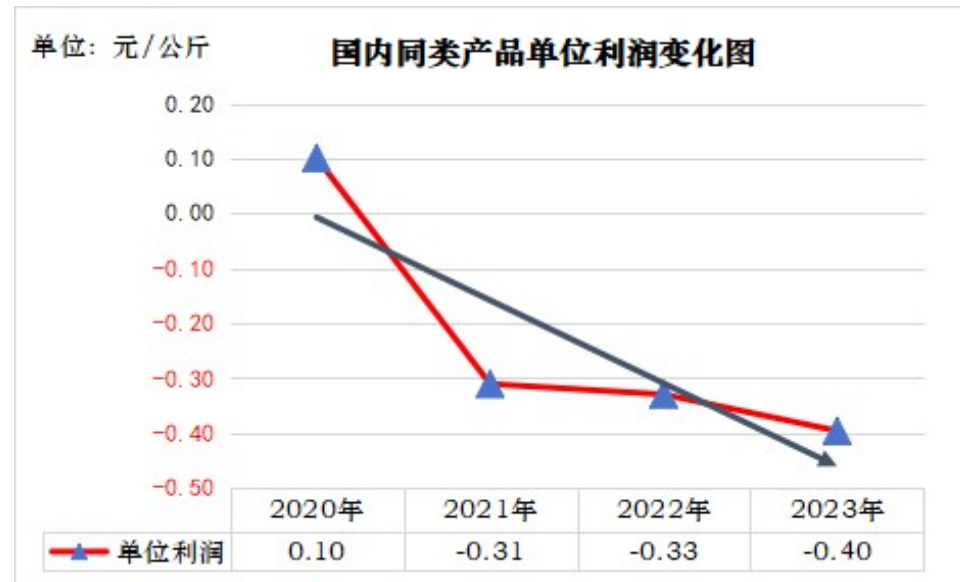
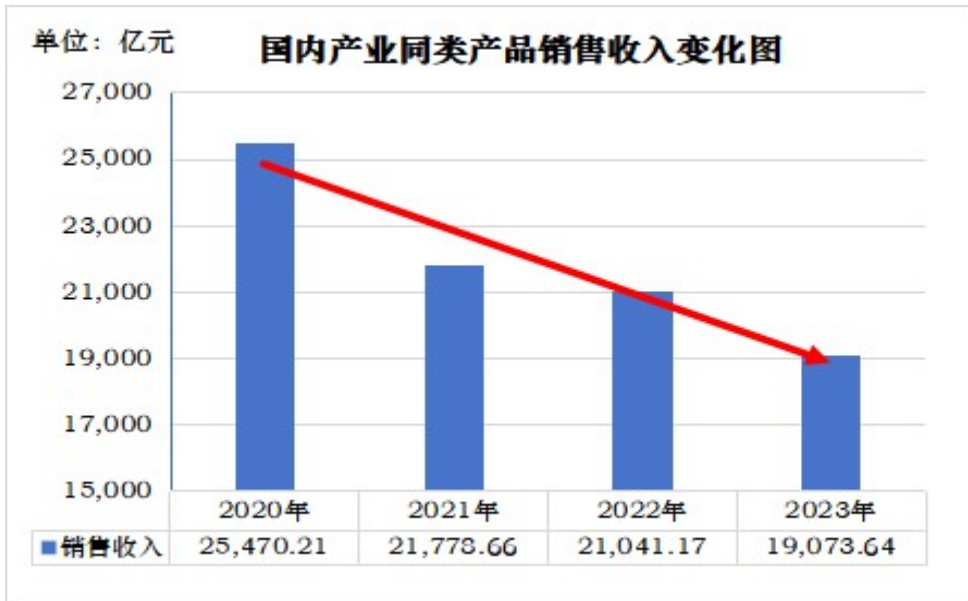
Under the impact of large-scale, low-price dumping of the products under investigation, the production, operation and financial status of similar products in the domestic industry have been significantly impacted and affected:

On the one hand, during the application investigation period, although the production, sales and market share of similar products in the domestic industry showed an upward trend, the growth in production and sales of similar products did not bring corresponding economies of scale and profits to the domestic industry. Moreover, the inventory of similar products showed a continuous upward trend.



On the other hand, as prices were depressed and cut by the products under investigation, the ability of similar products to create benefits was significantly negatively affected. During the entire application investigation period, prices, revenues, and profits of similar products in the domestic industry continued to decline. The entire industry has gone from profitability in 2020 to continuous losses since 2021, and the amount of losses has continued to expand.





Based on the above analysis, the applicant believes that the large-scale and low-price dumping of the products under investigation is the cause of substantial damage to China's relevant pork and pork by-products industries, and that there is a correlation between the large-scale and low-price dumping of the products under investigation and the substantial damage suffered by similar products in the domestic industry.

(II) Analysis of other factors that may cause damage to domestic industries

1. The impact of imported products from other countries and regions

Relevant evidence shows that the main source countries (regions) for China's imports of relevant pork and pork by-products, in addition to the European Union applied for this time, also include the United States, Brazil, Canada, the United Kingdom, Chile, Mexico, Argentina, Switzerland and other countries and regions.

In terms of the proportion of import volume, during the application investigation period, the annual average proportion of the products under investigation in China's total import volume of similar products was as high as 54%, constituting the main part of China's total import volume of similar products, while the annual average proportion of the total import volume of the products not under investigation in China's total import volume of similar products in China was only 46%. Moreover, the import sources of the products not under investigation were scattered in many countries and regions such as the United States, Brazil, Canada, the United Kingdom, Chile, Mexico, Argentina and Switzerland, and the proportion of the total import volume of a single country (region) in China's total import volume of similar products was much smaller than that of the European Union. In addition, the applicant did not find any dumping behavior in the export of other imported products to China.

In summary, the applicant believes that the import of relevant pork and pork by-products from other countries cannot negate the substantial damage caused to the domestic industry by the products under investigation.

2. The impact of changes in market demand

From 2020 to 2023, the domestic demand for related pork and pork by-products showed a continuous growth trend, reaching 57.7904 million tons, 72.0515 million tons, 73.0039 million tons and 76.0642 million tons from 2020 to 2023, respectively, and increasing by 24.68%, 1.32% and 4.19% from 2021 to 2023, respectively, compared with the previous year, and a substantial increase of 31.62% in 2023 compared with 2020. Therefore, the applicant believes that the damage to the domestic industry is not caused by shrinking market demand.

3. The impact of changes in consumption patterns

So far, China has not made any policy changes to restrict the use of relevant pork and pork by-products. And as mentioned above, during the application investigation period, the demand for relevant pork and pork by-products in China continued to grow steadily, so there was no shrinkage in the demand for relevant pork and pork by-products due to changes in consumption patterns such as other substitute products.

4. The impact of export changes

During the investigation period, the export volume of similar domestic products accounted for only about 0.1% of the total output during the same period.

Therefore, the damage to the domestic industry is not caused by exports.

5. The impact of normal competition at home and abroad

As mentioned above, the product quality and sales channels of the products under investigation and similar domestic products are basically the same, and there is overlap in customer groups. In terms of production and operation management, domestic manufacturers are also committed to standardizing and improving management.

Therefore, domestic similar products have good market competitiveness in terms of product quality and production and operation management. Moreover, Chinese enterprises have obvious location advantages, and have favorable factors that cannot be replaced by imported products, such as timely delivery and convenience. If the product under investigation competes fairly with domestic similar products, the domestic industry has complete local advantages and should not suffer damage.

6, the impact of commercial distribution channels and trade policies

With the further deepening of reform and opening up and the continuous improvement of the market economy system, China currently implements a market-based pricing mechanism for relevant pork and pork by-products, and production and operation are completely regulated by market rules. The sales channels of similar products in the domestic industry are the same as those of the products under investigation, and there are no factors in the commercial circulation field that hinder the sales of similar domestic products or cause damage to the domestic industry.

In addition, so far, China has not issued other relevant policies to restrict the trade practices of this industry, and the domestic industry has not been negatively affected in this regard.

3. Conclusion

Based on the above analysis, the applicant believes that there is a causal relationship between the product under investigation and the substantial damage suffered by similar products in the domestic industry, and other factors cannot negate the damage caused by the product under investigation to the domestic industry.

8. Consideration of Public Interest

The applicant believes that the anti-dumping of the pork and pork by-products industry is to correct the unfair trade competition of imported dumped products and eliminate the damaging effects of dumping on the pork and pork by-products industry in China. The purpose of taking anti-dumping measures is to maintain and regulate the normal trade order and restore and promote fair competition by restricting the irregular low-price dumping behavior that disrupts the normal market order. According to anti-dumping practice, special attention should be paid to restoring the distorted market order and protecting effective competition when considering public interest issues.

The dumping of pork and pork by-products originating from the EU in China at low prices has undermined the fair competition order in the Chinese market and has had a significant impact on the pork and pork by-products industry in China. In this case, taking anti-dumping measures will help restore this distorted competition order, help maintain the safety of the pork and pork by-products industry in China, and be in the public interest.

For a long time, my country has been the world's largest pork producer and consumer. Pork is the main source of animal protein for Chinese residents and has long dominated my country's meat consumption. In recent years, China's per capita pork consumption has basically maintained a steady growth trend, and its consumption is much higher than other animal products. From 2020 to 2023, the overall per capita pork consumption in China will increase from 18.2 kg/person in 2020 to 30.5 kg/person in 2023. Pork is a necessity for people's livelihood and has the strategic significance of "pig and grain to ensure peace in the world".

In order to standardize and promote the development of my country's animal husbandry, improve the modernization level of my country's animal husbandry, and ensure the stable and effective supply of agricultural products including pork, the CPC Central Committee and the State Council have issued "No. 1 Document" for many consecutive years since 2004, making important arrangements for the development policy of animal husbandry and measures to support the development of animal husbandry. It can be seen from the "No. 1 Document" issued by the CPC Central Committee and the State Council that the stable production and supply of pigs and pork are related to the national economy and people's livelihood, and the stabilization of pig and pork production and supply, and the promotion of pig standardization, large-scale breeding and slaughtering have been supported at the national policy level.

Pig breeding and slaughtering are typical labor-intensive industries. In addition to breeding and slaughtering, the pig industry chain also includes feed production, vaccine and veterinary drug supply, pork deep processing, product packaging, warehousing, transportation, sales, catering and other links. The pig industry chain has created a large number of employment opportunities. At present, there are tens of millions of jobs involved in pig breeding and slaughtering alone. Moreover, pig breeding and slaughtering are one of the important channels for farmers to get rich. The healthy development of the pig industry chain is conducive to promoting the adjustment of my country's rural industrial structure, and has played a positive role in solving the employment of surplus rural labor and increasing farmers' income.

Due to the dumping of relevant pork and pork by-products originating from the EU in China at low prices, not only has the price and profitability of relevant pork and pork by-products in China shown a significant downward trend and deterioration, but it has also had a significant impact on my country's pig farming industry. Evidence shows (see Appendix 4): In 2020, the national pig farm price was 33.72 yuan/kg, which dropped to 19.96 yuan/kg and 19.46 yuan/kg in 2021 and 2022, and further dropped to 15.35 yuan/kg in 2023, a cumulative drop of 54% compared with 2020. Due to the sharp decline in prices, the net profit of pig farming in the country has also shown a significant downward trend. In 2020, the national net profit of pigs was 1,408 yuan/head, with a total profit of 742 billion yuan. In 2021 and 2022, the national net profit of live pigs fell to 83 yuan per head and 390 yuan per head, and the total profit fell to 55.6 billion yuan and 272.9 billion yuan. In 2023, the national net profit of live pigs further declined, with a loss of 165 yuan per head and a total loss of 112 billion yuan, which seriously affected the interests of breeders and farmers. In this context, if anti-dumping measures are not taken in a timely manner against the products under investigation, it will not only be detrimental to the stability and healthy development of the supply chain of the pork and pork by-products industry chain, but may also cause serious social problems to the country. It is in the public interest to conduct anti-dumping investigations and implement anti-dumping measures on the products under investigation.

In addition, the implementation of anti-dumping measures will not substantially affect the interests of downstream industries and users. Anti-dumping is aimed at products that are dumped in a price-discriminatory manner, and does not resist normal foreign trade, nor will it create obstacles to legitimate and fair imports. The purpose of taking anti-dumping measures is to adjust the price of dumped imported products to a fair competitive level, not to block imported products. If relevant anti-dumping measures are taken in the future, the products under investigation can be exported to China at a fair and normal price level, and their legitimate imports will not be subject to any restrictions.

In summary, the applicant believes that it is in the public interest to conduct an anti-dumping investigation and take anti-dumping measures on imports of relevant pork and pork by-products originating in the European Union.

IX. Conclusion and Request

1. Conclusion

Based on the above facts and reasons, the applicant believes that there is obvious dumping of imported pork and pork by-products originating from the European Union in the Chinese market, and that such dumping has caused substantial damage to the domestic pork and pork by-products industry.

In this case, timely and effective anti-dumping investigations and the adoption of corresponding anti-dumping measures will help restore the distorted market competition order, protect the legitimate rights and interests of the relevant pork and pork by-products industry, ensure the normal development of the domestic industry, and further protect the stability and security of the entire industrial chain and supply chain, including the domestic industry. Therefore, it is in the public interest to conduct anti-dumping investigations and take anti-dumping measures on imports of relevant pork and pork by-products originating from the EU.

(ii) Request

In order to protect the legitimate rights and interests of China's relevant pork and pork by-products industry and its future development prospects, in accordance with the provisions of the Foreign Trade Law of the People's Republic of China and the Anti-dumping Regulations of the People's Republic of China, the Applicant requests the Ministry of Commerce of the People's Republic of China to initiate an anti-dumping investigation on the relevant pork and pork by-products originating in the European Union and exported to China, and to make recommendations to the Tariff Committee of the State Council based on the investigation results to impose anti-dumping duties on the relevant pork and pork by-products originating in the European Union and exported to China.

Part II Confidentiality Application

1. Confidentiality Application

Pursuant to Article 22 of the Anti-dumping Regulations of the People's Republic of China, the Applicant requests that the materials and attachments in this application be kept confidential, that is, except for the investigation authority of this case and the departments specified in the Anti-dumping Regulations of the People's Republic of China, these materials shall be kept confidential in any way and any access, inspection, retrieval or understanding in any way is prohibited.

2. Non-confidential Summary

In order to enable the interested parties in this case to understand the comprehensive information of this application and its attachments, the applicant hereby prepares a public text of the application and its attachments, and the materials and information requested to be kept confidential are explained or summarized in a non-confidential manner in the public text of the application and its attachments.

Part III Catalogue and List of Evidence

- Annex I:** The applicant's social group legal person registration certificate and power of attorney
- Annex II:** Declaration on the application for anti-dumping investigation on relevant pork and pork by-products; Attorney's
- Annex III:** appointment letter and attorney's practice certificate
- Annex 4:** Explanation on the production and operation data of similar domestic products
- Annex 5:** Import and Export Tariff of the People's Republic of China,2020-2023
- Annex VI:** China's pork and pork by-products import and export statistics
- Annex VII:** Data sources and explanations of ocean freight and insurance costs
- Annex 8:** **World Bank Group report on EU trade costs**
- Annex IX:** Apply for investigation of normal value information of products
- Annex 10:** Explanation on the price situation of pork and pork by-products in my country
- Annex XI:** Exchange Rate Table