



**The EU dumping of some agricultural exports
in 2012, particularly to ACP countries**
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Introduction

I – Excerpts of WTO Appellate Body's rulings

II – The SPS and SAPS imply that all EU agricultural exports can be sued for dumping

III – The EU feed subsidies
to extra-EU and ACPs in 2012

IV – Assessment of the EU dumping of some agri-food exports to extra-EU and
ACPs in 2012

4.1 – The EU dumping on its exports of cereals

4.2 – The EU dumping on its dairy exports

4.3 – The EU dumping on its poultry and eggs exports

4.4 – The EU dumping on its pork exports

4.5 – The EU dumping on its bovine meat exports

Conclusion

Annex: The EU subsidies on its cotton exports in 2012 and impact on ACPs

Allan Matthews' paper on export refunds¹, following the EU Commission stance, touches only to the emerged part of the iceberg of EU export subsidies as he forgets the much larger domestic subsidies benefitting also to the exported products.

This EU stance is all the more detrimental to ACPs countries that the EU Commission is imposing to them, willy-nilly, the deadline of 1 October 2014 to ratify the regional EPAs (Economic partnership agreements), without which they will lose their duty-free quota-free access to the EU market. Yet the texts of regional EPAs they are demanded to sign and ratify exclude the fundamental issue of agricultural subsidies that the EU claims can only be dealt with at the WTO level.

Before assessing the EU dumping of some of its products on ACPs' markets, we will quote some excerpts of the four WTO Appellate Body rulings – twice in the Dairy products of Canada case, in the US Cotton case and the EU Sugar case – that domestic subsidies going to exported products have a dumping effect. Therefore they should be understood to be included in the Bali Ministerial Declaration of 7 December 2013 on "Export competition" which *"reaffirm our commitment, as an outcome of the negotiations, to the parallel elimination of all forms of export subsidies and disciplines on all export measures with equivalent effect, as set out in the 2005 Hong Kong Ministerial Declaration"*².

¹ <http://capreform.eu/export-refunds-and-africa/>

² http://wto.org/english/thewto_e/minist_e/mc9_e/bali_texts_combined_e.pdf

Then we will show that the EU allegedly decoupled main domestic subsidies can be sued at the WTO for dumping and we will analyse in details the subsidies to the exported cereals, dairy products and meats of poultry, pork and beef to ACPs. However we need first to identify the feed subsidies consumed by all these animal products, which are by far the dominant type of subsidies to the EU meats and dairy products since export refunds have disappeared since July 2013 even if they were still significant in 2012 on poultry and pork.

I – Excerpts of the WTO Appellate Body rulings

1.1- Dairy products of Canada case on 3 December 2001: *"The distinction between the domestic support and export subsidies disciplines in the Agreement on Agriculture would also be eroded if a WTO Member were entitled to use domestic support, without limit, to provide support for exports of agricultural products. Broadly stated, domestic support provisions of that Agreement, coupled with high levels of tariff protection, allow extensive support to producers, as compared with the limitations imposed through the export subsidies disciplines. Consequently, if domestic support could be used, without limit, to provide support for exports, it would undermine the benefits intended to accrue through a WTO Member's export subsidy commitments (paragraph 91)...The potential for WTO Members to export their agricultural production is preserved, provided that any export-destined sales by a producer at below the total cost of production are not financed by virtue of governmental action (paragraph 92)"³.*

1.2- Dairy products of Canada case on 20 December 2002: *"If governmental action in support of the domestic market could be applied to subsidize export sales, without respecting the commitments Members made to limit the level of export subsidies, the value of these commitments would be undermined. Article 9.1(c) addresses this possibility by bringing, in some circumstances, governmental action in the domestic market within the scope of the "export subsidies" disciplines of Article 3.3" (paragraph 148)⁴.*

1.3- US Cotton case on 3 March 2005: *the Appellate Body "Upholds the Panel's finding, in paragraphs 7.1416 and 8.1(g)(i) of the Panel Report, that the effect of the marketing loan program payments, Step 2 payments, market loss assistance payments, and counter-cyclical payments (the "price-contingent subsidies") is significant price suppression within the meaning of Article 6.3(c) of the SCM Agreement"⁵, in other words that these amber domestic supports have had a dumping effect⁶.*

Paragraph 7.1416 of the panel report: *"In conclusion... we find that the effect of the mandatory, price contingent United States subsidies at issue – that is, marketing loan programme payments, user marketing (Step 2) payments and MLA payments and CCP payments – is significant price suppression in the same world market for upland cotton in the period MY 1999-2002 within the meaning of Articles 6.3(c) and 5(c) of the SCM Agreement"⁷.*

Paragraph 8.1(g)(i) of the panel report: *"Concerning serious prejudice to the interests of Brazil: the effect of the mandatory price-contingent United States subsidy measures –*

³ WT/DS113/AB/RW, 3 December 2001

⁴ WT/DS103/AB/RW2, 20 December 2002

⁵ WT/DS267/AB/R, 3 March 2005

⁶ Article 6.3(c) of the SCM Agreement: *"The effect of the subsidy is a significant price undercutting by the subsidized product as compared with the price of a like product of another Member in the same market or significant price suppression, price depression or lost sales in the same market".*

⁷ WT/DS267/R [xx 2004]

marketing loan programme payments, user marketing (Step 2) payments, MLA payments and CCP payments -- is significant price suppression in the same world market within the meaning of Article 6.3(c) of the SCM Agreement constituting serious prejudice to the interests of Brazil within the meaning of Article 5(c) of the SCM Agreement"

1.4- EU Sugar case of 20 April 2005: the Appellate Body "*d) upholds the Panel's finding, in paragraph 7.334 of the Panel Reports, that the production of C sugar receives a "payment on the export financed by virtue of governmental action", within the meaning of Article 9.1(c) of the Agreement on Agriculture, in the form of transfers of financial resources through cross-subsidization resulting from the operation of the European Communities' sugar regime" (paragraph 346.d); "e) upholds, as a result of its findings under (c) and (d) above, the Panel's finding, in paragraph 8.1(f) of the Panel Reports, that there is prima facie evidence that the European Communities has been providing export subsidies, within the meaning of Article 9.1(c) of the Agreement on Agriculture, to its exports of C sugar since 1995 (paragraph 346.e)"⁸.*

II – The allegedly fully decoupled SPS and SAPS imply that all EU agricultural exports can be sued for dumping

As the SPS ("single payment scheme" in the EU15 plus Malta and Slovenia) and SAPS ("single area payment scheme" in the other EU12 new Member States) are allegedly fully decoupled they cannot be allocated to any specific agricultural product so that they benefit to all, including to those which did not benefit previously from specific subsidies. Therefore all EU exported agricultural products can be sued at the WTO for dumping.

In 2012 the outturn of SPS and SAPS reached €36.996 billion (bn) and the total value of agricultural products at producers' prices reached €371 bn, implying that SPS+SAPS represented practically 10% (99.72% precisely) of all EU agricultural output (excluding services at farm level). At the same time all agricultural exports reached €110.5 billion (bn), of which €104.7 bn in classes 1 to 24 of the Harmonized System trade nomenclature, without fish and preparations (table 1). Within the €5.8 bn of exports of agricultural products outside classes 1 to 24, the main ones are raw hides, skins and furskins for €2.9 bn, caseins, albumins, gelatins, peptones and dextrans for €1.7 bn, raw cotton for €505 M, essential oils for €368 M and raw flax for €221 M. We will devote a short annex to cotton, given its importance in some ACPs, particularly in West Africa.

Clearly the production value of all agri-food products is much larger than the value of the agricultural products at farm level as they incorporate the added value of processing and marketing. But we are concerned by the subsidies to the agricultural components of the final agri-food products so that we can say that the SPS+SAPS represented in 2012 10% of the whole agricultural production value.

However it is necessary to be much more specific so that we will make an in-depth analysis of the EU dumping in 2012 for some of its main exported products, to all countries and more precisely to ACPs. Table 1 shows that, apart from fish and preparations where the ACPs accounted for almost 20% of the EU exports but which are not agricultural products, the following products represented 55.3% of all EU agricultural exports to ACPs in 2012, the

⁸ WT/DS265/AB/R, WT/DS266/AB/R, WT/DS283/AB/R, 28 April 2005

shares being of 11.9% for cereals, 25.3% for milling products, 10.6% for cereals preparations, 9.9% for dairy and 7.6% for meats. It is why we will analyse the EU subsidies to them.

Table 1 – EU27 exports of agricultural products to extra-EU27 and ACPs in 2012

	All EU exports			EU exports to ACPs			% to ACPs		
	1000 t	€1000	FOB	1000 t	€1000	FOB	1000 t	€1000	FOB
1- Live animals	427	2047121	4794,3	1,6	27286	17182,5	0,37%	1,33%	358%
2- Meats	4647,4	8401949	1807,9	552,4	635447	1150,4	11,89%	7,56%	63,6%
3- Fish	1534,3	33512,7	2152,4	611,2	757166	1238,8	39,84%	22,59%	57,6%
4- Dairy produce	3465,4	9197061	2654	422,7	913324	2160,9	12,20%	9,93%	81,4%
5- Products of animal origin	434,9	832810	1914,8	8,7	6973	804,1	0,20%	0,84%	42%
6- Live trees and other plants	797,7	2002869	2507,5	3,3	12267	3744,5	0,41%	0,61%	149%
7- Vegetables	4188,8	2794996	667,3	744,8	198247	266,2	17,78%	7,09%	39,9%
8- Fruits	4308,3	3887365	902,3	32,7	40285	1232,5	0,76%	1,04%	137%
9- Coffee, tea, spices	347,1	1723600	4966,2	6,4	3586,5	5573	1,84%	0,21%	112,2%
10- Cereals	22042,3	5711738	259,1	2737	681076	248,8	12,42%	11,92%	96,1%
11- Milling products	4729,2	2370795	501,3	1513,3	599112	395,9	32%	25,27%	79%
12- Oilseeds	2766,6	2401537	868	49,9	54322,8	1088,9	1,80%	2,26%	125%
13- Lac, gums, resins	110,1	953172	8654	6,9	43851	6367,2	6,27%	4,60%	73,6%
14- Vegetable plaiting material	10,8	13564	1254,9	0,7	788	1142,1	6,48%	5,81%	91%
15- Animal & veget. fats & oils	3032,6	4760360	1569,8	178,9	249520	1394,9	5,90%	5,24%	88,9%
16- Preparations meats&fish	457,9	1552353	3389,8	76,6	186310	2432,2	16,72%	12%	71,8%
17- Sugars & confectionery	2794,8	2421243	866,3	224,8	144221	641,6	8,04%	5,96%	74,1%
18- Cocoa & preparations	977,2	4357639	4459,2	11,8	46602	3945,9	1,21%	1,07%	88,5%
19- Preparations of cereals	2944,5	7829129	2658,9	457,6	828545	1810,4	15,54%	10,58%	68,1%
20- Preparat. vegetables, fruit	3587,3	4214600	1174,9	329,1	340083	1033,4	9,17%	8,07%	88%
21- Miscellaneous preparat.	1775,6	6828022	3845,5	183,4	473831	2584,3	10,33%	6,94%	67,2%
22- Beverages	10411,9	24955887	2396,9	1141,8	1218758	1067,4	10,97%	4,88%	44,5%
23- Residues, oilseeds meals	5183,6	3944282	760,9	168,2	138706	824,9	3,24%	3,52%	108,4%
24- Tobacco	832,7	5407278	6493,6	29,8	183853	6179,4	3,58%	3,40%	95,2%
Total classes 1 to 24	81808	108642883	1328	9493,6	7784160	819,9	11,61%	7,06%	60,9%
Fish & preparations	1706,5	3941234	2309,5	616,9	781845	1267,4	36,11%	19,77%	54,7%
Total agricultural products classes 1-24	80102	104701649	1307,1	8880	7002315	788,5	11,09%	6,69%	59,4%
Products outside classes 1 à 24	1631,7	5793758	3550,8	34,3	63368	1847,7	2,1%	1,1%	52%
TOTAL of all agricultural products	81733,7	110495407	1351,9	8914,3	7065683	792,6	10,91%	6,39%	58,6%

However we will be extremely conservative in our assessment of these subsidies as we will not take into account the non product-specific subsidies of the amber box (or AMS, aggregate measurement of support) – on other inputs than feed: agricultural loans, agricultural insurance, agricultural fuel and energy, ethanol and biodiesel, irrigation, fertilizers, seeds, etc – and on the whole green box other than the SPS and SAPS. Indeed we could also have added the subsidies to agricultural investments – that the AoA article 6.2 puts also in the amber box for the developed countries – and to marketing promotion that the AoA Annex3 paragraph 13 and Annex 4 paragraph 4 put in the AMS. Which implies that this conservative assessment underscores largely the actual agricultural dumping of the EU on ACPs.

III – The EU feed subsidies in 2012

The EU feed subsidies are clearly subject to reduction as input subsidies according to the AoA (Agreement on Agriculture of the WTO) article 6 paragraph 2 which exempts only poor farmers in developing countries (DCs) from putting them in the amber box (AMS): *"Investment subsidies which are generally available to agriculture in developing country Members and agricultural input subsidies generally available to low-income or resource-poor producers in developing country Members shall be exempt from domestic support reduction commitments that would otherwise be applicable to such measures"*. Yet the developed countries, and here particularly the EU, have always refused to notify to the WTO their main feed subsidies – those to COPs: cereals, oilseeds and pulses – although they have notified some minor ones – to dried fodder, silage for beef and skimmed milk for calves for

the EU and to grazing fees on public lands for the US –, showing that they recognize that subsidies to feed are input subsidies of the amber box.

Their huge cheating in that area has been largely promoted by the OECD tortuous concept of "excess feed cost" used to assess its other ambiguous concept of PSE (producer's support estimate). The OECD's basic statement that "*The excess feed cost due to the price support of cereals is deducted from the price support of animal products. Therefore it is not possible to take it into account a second time in input subsidies*" could have been at best debated when the world prices of cereals was low so that this alleged "excess feed cost" represented by the difference between the domestic prices of cereals (and all COPS more broadly) used in feed and their world prices was large – for an average of €4.147 bn in the EU from 1986 to 1999 – but now that the world prices of cereals have skyrocketed since 2008 the "excess feed cost" has totally disappeared (is zero) in the OECD PSE. Yet the feed subsidies are still there, hidden for the EU in its SPS and SAPS, which is the best refutation of this mystifying OECD concept of "excess feed cost".

Now feed is by far the largest input in production costs of meats, eggs and dairy products so that their exports are highly subsidized.

According to FEFAC, the EU federation of compound feed producers, the EU production of compound feed (CF) was 153,541 Mt in 2012⁹, of which 38.372 Mt of cattle feed (meat and milk), 49.777 Mt of pig feed, 51,504 Mt of poultry feed, 1.305 Mt of milk replacers (to add to meat cattle feed) and 9,829 Mt to other animals (sheep, goats, horses, fish, rabbits, pet food, etc) that we will delete (and the sheep and goat milk as well).

Besides 86.5 Mt of concentrates were used on farms, of which 53 Mt of cereals self-consumed by the farmers and totally of EU origin and 33.5 Mt of other feed they had to buy, mainly oilcakes and meals most often imported and co-products of agro-food industries, mainly of EU origin.

On the other hand the Tallage report¹⁰ shows that the distribution of concentrates between compound feed (CF) and on-farm feed (FF) for the EU bovine cattle, pig and poultry, was in 2008 of 57.6% and 42.4% respectively and that the energy feed accounted for 79.1% and the protein feed for 20.9%, of which 71.5% and 28.5% respectively for CF and 89.4% and 10.6% respectively for FF.

Table 2 – Distribution of EU concentrates between CF and FF (and %) in 2007-08

Million tonnes	Compound feed	On farm feed	Total
Energy feed	96,5 (52,11%)	88,7 (47,89%)	185,2 (100%)
Protein feed	38,4 (78,53%)	10,5 (21,47%)	48,9 (100%)
Total	134,9 (57,62%)	99,2 (42,38%)	234,1 (100%)

Source: Tallage report

As, according to the FEFAC report for 2008, the levels of total concentrates (240 Mt) and their distribution between CF (153.292 Mt) and FF (89 MT of which 51 Mt of self-consumed

⁹ <http://www.fefac.eu/publications.aspx?CategoryID=2061&EntryID=10802>

¹⁰ Tallage, *Modelling of feed consumption in the European Union*, November 2009, http://ec.europa.eu/agriculture/analysis/external/feed/index_en.htm, a report prepared for DG Agriculture for which "*the study provided a comprehensive overview of feed consumption in the EU*".

cereals) were practically the same in 2008 than in 2012, we can apply the Tallage distribution among feeds of 2007-08 to 2012.

However FEFAC shows that the CF production used in 2012 43.615 Mt of imported feed materials – of which 26.7 Mt of oilcakes, 10.2 Mt of cereals and 2.2 Mt of molasses – so that the CF of EU origin was only of 109.929 Mt, of which 64.220 Mt of cereals, 25.822 Mt of oilcakes, 17.026 Mt of coproducts of the food industries, 1.204 Mt of pulses, 2.547 Mt of oils and fats. Therefore the net CF of EU origin was composed of 89.434 Mt of energy products and 20.492 Mt of protein products.

If we assume than the distribution of all concentrates between CF and FF of 2007-08 can be applied to the distribution of concentrates of EU origin, the more so as feed prices were almost as high in the two years, table 3 deducts this distribution also for FF in 2012.

Table 3 – Distribution of EU concentrates of EU origin in 2012

Million tonnes	Compound feed	On-farm feed	Total
Energy feed	89,43 (92,67%)	82,20 (47,89%)	171,63 (100%)
Protein feed	20,49 (53,36%)	5,60 (21,46%)	26,09 (100%)
Total	109,91 (81,48%)	87,80 (44,41%)	197,71 (100%)

Source: FEFAC

Table 4 uses the Tallage report to distribute the CF and FF between animals in 2012.

Table 4 – Distribution of EU CF and FF between animals in 2012

%	Bovine cattle	Milk cattle	Pig	Poultry	Total
CF	10,54	18,99	34,64	35,84	100
FF	36,14	13,62	38,45	11,80	100

Source: FEFAC and Tallage

Now table 5 applies this distribution of CF and FF between animals to table 2 to get the distribution of EU concentrates between energy and protein feed of EU origin.

Table 5 – EU CF and FF between energy feed and protein feed and between animals in 2012

Mt	Bovine meat	Milk cattle	Pig	Poultry	Total
Compound feed					
Energy feed	9,43	16,98	30,98	32,05	89,43
Protein feed	2,16	3,89	7,10	7,34	20,49
Total	11,59	20,87	38,08	39,39	109,92
On-farm feed					
Energy feed	29,71	11,20	31,61	9,70	82,22
Protein feed	2,02	0,76	2,15	0,66	5,59
Total	31,73	11,96	33,76	10,36	87,81
Total concentrates					
Energy feed	39,14	28,18	62,59	41,75	171,65
Protein feed	4,18	4,65	9,25	8,00	26,08
Total	43,32	32,83	71,84	49,75	197,73

Source: FEFAC and Tallage

Taken from a confidential report written in 2012, table 6 shows the evolution of the EU total subsidies to feed from 2000 to 2010. Given that the overwhelming share of these feed subsidies are hidden in the allegedly decoupled SPS (single payment scheme for EU15 plus Slovenia and Malta) and SAPS (single area payment scheme for the other EU10 new Member

States), we will use those of 2010 as a proxy for 2012, even if they were somewhat larger given that Bulgaria and Romania had not yet reached their full catching up of per ha SAPS.

Table 6 – EU total subsidies to feed from 2000 to 2010

€ million	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	Average
EU15 energy	6437	7803	8094	9135	7324	9333	9350	9189	8117	9373	9613	8524
EU12 energy						1629	2095	2782	2335	2678	3070	1326
Vegetable oil	431	601	568	431	422	561	561	561	561	561	561	529
EU27 energy	6868	8404	8662	9566	7746	11523	12006	12532	11013	12612	13244	10379
EU15 protein	1879	1792	2004	1898	1956	1870	1541	1456	1432	1943	1390	1742
EU12 protein						29	38	81	75	88	105	37
EU27 protein	1879	1792	2004	1898	1956	1919	1579	1537	1507	2031	1495	1779
Total	8747	10196	10666	11464	9702	13442	13585	14069	12520	14643	14739	12158

Table 7 distributes the feed subsidies in 2012 between energy feed and protein feed and animals but without the necessity to distinguish between CF and FF.

Table 7 – EU distribution of CF & FF between energy feed & protein feed and animals in 2012

	Bovine meat	Milk cattle	Pig	Poultry	Total
Total concentrates in Mt					
Energy feed	39,14	28,18	62,59	41,75	171,65
Protein feed	4,18	4,65	9,25	8,00	26,08
Total	43,32	32,83	71,84	49,75	197,73
Distribution of feed subsidies between animal in €M					
Energy feed	3019,9	2174,3	4829,3	3221,3	13244,3
Protein feed	239,6	266,6	530,2	458,6	1495
Total	3259,5	2440,8	5359,5	3679,9	14739,7

Given the EU production volume and value (at farm prices) of animal products in 2012, table 8 shows the average feed subsidy per tonne and the corresponding subsidies to all exports. However we have converted in carcass weight equivalent (cwe) – to which we have assimilated the shell egg equivalent added to poultry – and milk weight equivalent (me) all the exported products, including live animals and processed products (detailed tables below).

Table 8 – EU production, exports and feed subsidies on meat and milk products in 2012

	Bovine meat	Milk	Pig	Poultry+egg	Total meat
EU production in 2012					
Production: 1000 t	7578	140148	22004	12466	42048
Production: € million	32087	51619	37621	30204	151531
EU exports in product weight and in cwe and me in 2012					
1000 t export product	610,5	3402	2879	1466	4955,5
1000 t of c.w.e. or m.e.	499,3	18588	3322,7	1762	5584
Export/production: %	8,06%	13,26%	13,08%	20,78%	14,45%
Export value: € million	1683	8813	6125	2392	10200
FOB price: €/t product	2756	2590	2127,6	1632	2058,3
FOB price: €/t c.w.e.	3369	474,1	1843,2	1357,5	1826,6
Feed subsidies					
Total: €M	3259,5	2440,8	5359,5	3679,9	12298,9
€/t of production	430,1	17,4	243,6	295,2	292,5
Subsidies/exports: M€	262,4	323,7	701,2	432,8	1396,4
Subs/t export product	429,8	95,1	243,6	295,2	281,8
" €/tcwe or €/tme	414,6	17,4	216,6	245,1	250,1
Feed sub.dumping rate	17,9%	3,7%	11,4%	18,1%	14,1%

The average feed subsidy per tonne of all exported meats was €281.8 – from €243.6 for pork to €295.1 for poultry to €430.1 for bovine meat –, that for dairy being limited to €95.1 per tonne of product and 13.1 per tonne of milk equivalent, implying an average dumping rate from feed of 14.1% for all meats – going from 11.4% for pork to 18.1% for bovine meat – and of 3.7% only for milk. But the reader should be aware that these dumping rates concern only feed subsidies and not the whole dumping rates incorporating direct payments to producers and export refunds.

IV - Assessment of the EU dumping of some agri-food exports to extra-EU27 and ACPs in 2012

Formally South Africa is not an ACP member as it did not sign the Cotonou Agreement having already signed in 1999 a bilateral agreement with the EU (TDCA: EU-South Africa Trade, Development and Cooperation Agreement). Yet South Africa is profoundly involved with the other ACPs, particularly in the SADC, the Regional economic community of Southern Africa, together with Angola, Botswana, Lesotho, Mozambique, Namibia and Swaziland. So that the following figures include exports to South Africa.

Table 1 has shown that the EU exported 8.9 million tonnes (Mt) of agricultural and food products for €7 bn to ACPs in 2012, covering the 24 first classes to the HS trade nomenclature (we did not take into account the other products, such as casein and lactose for dairy products). We will assess the dumping of EU wheat, dairy products and meats in 2012.

A methodological question relates to the appropriate data to assess the rate of dumping. We avail of the production value at current farm prices of the unprocessed agricultural products but many exports are processed products. The issue is solved by transforming these processed products in cereals equivalent, carcass weight equivalent (cwe) – the production of some meat is already provided in cwe – and milk equivalent (me). However it has been difficult to find the conversion rates in cwe of detailed exports of cereal and meat products at the HS8 level, and Eurostat has let me know that such conversion tables are not available in the EU. However I have avail of some conversion rates used by USDA, Canada and France but which are often contradictory. Generally the cwe is much below 1 for live animals, higher than 1 for meat cuts and unboned meats as well as for meat preparations (of the HS2 class 16) but some meat preparations are given a cwe much lower than 1 and the more so for live animals. So that I advise the reader that the present conversion rates presented in the tables by product and the distribution between meats and preparations are only approximate. The same reservation applies to milk equivalent of dairy products.

4.1- The EU dumping on its exports of cereals

EU exports of cereals to all countries reached 34.550 Mt in 2012, of which 22 Mt of raw cereals for €5.712 bn, and 11 Mt in processed products, of which 5,4 Mt in flours, groats, malt and starch, 4,9 Mt in cereals preparations and 2.1 Mt in beer and spirits (table 9).

Given an average domestic subsidy of 61.9 €/t – coming essentially from the allegedly decoupled direct payments hidden in the SPS (single payment system) and SAPS (single area payment system) and extracted from a personal report; but the Council Regulation 1782/2003 of 29 September 2003 had already fixed at 63 €/t the EU15 direct payment to cereals to be incorporated in the SPS, the average direct payment in the SAPS being however significantly lower – the export subsidies reached €2.138 bn and the dumping rate of raw cereals

incorporated in all exported cereals products – measured by the ratio of subsidies to the export value of all cereals products – was of 8.8%, of which 29.8% for raw cereals.

Table 10 shows that the EU exports of cereal products to ACPs reached 5.653 Mt in 2012 for €350 M, of which 2.763 Mt of raw cereals, 1.930 Mt in products of the milling industry, 0.810 Mt in cereals preparations and 0,151 Mt in beer and spirits. Total subsidies to the cereals processed into these exports reached €350 M with an average dumping rate of 12%, significantly higher than for all extra-EU exports.

Table 9 – Percentage of cereals in the EU total exports of processed cereals in 2012

Code and label	Products exports		Cereal equivalent		Subsidy	Dumping rate
	dollars	tonnes	%	tonnes	dollars	%
1001 wheat	3974828185	15990286	100%	15990286	989798703	24,9%
1002 rye	15339871	67441,7	100%	67441,7	4174641,2	27,2%
1003 barley	841655399	3668986,1	100%	3668986,1	227110240	27%
1004 oats	32021407	135819,4	100%	135819,4	8407220,9	26,3%
1005 maize	687761401	1951336	100%	1951336	120787698	17,6%
1006 rice	149062866	209730,1	100%	209730,1	12982293,2	8,7%
1007 grain sorghum	3989405	9660,8	100%	9660,8	598003,5	15%
1008 other cereals	7079770	9080,6	100%	9080,6	562089,1	7,9%
All raw cereals	5711738304	22042340,7	100%	22042340,7	1364420889	23,9%
1101 wheat flour	296457657	800238,5	129,87%	1039270	64330813	21,7%
1102 other flours	19184628	35561	129,87%	46183,1	2858733,9	14,9%
1103 groats, pellets	142315690	347293,4	129,87%	451030	27918757	19,6%
1104 grains otherwise worked	122899358	171159,2	100%	171159,2	10594754,5	8,6%
1107 malt	995947010	2303435,6	120%	2764122,7	171099195	17,2%
1108 starches, inulin	455636031	680950,7	142,86%	972806,2	60216703,8	13,2%
19 cereals preparations	7829128892	2944503,1	1,667%	4907515	303775179	3,9%
2203 beer from malt	2608022603	2763839,9	17%	464325,1	28741723,7	1,1%
220830 whiskies	4517017282	590933,1	117%	691391,7	42797146,2	0,9%
220850 gin & geneva	290754931	57499,9	117%	672748,8	41643150,7	14,3
220860 vodka	1241979624	271161,3	117%	317258,7	19638313,5	1,6%
Total	24231082010	33008916,4		34540151,2	2138035359	8,8%

Source: Eurostat

Table 10 – Percentage of cereals in the EU exports of processed cereals to ACPs in 2012

Code and label	Products exports		Cereal equivalent		Subsidy	Dumping rate
	dollars	tonnes	%	tonnes	dollars	%
1001 wheat	652963411	2633305,5	100%	2633305,5	163001610	25%
1002 rye	194	0,3	100%	0,3	18,6	9,6%
1003 barley	10761583	38956	100%	38956	2411376,4	22,4%
1004 oats	55239	141,4	100%	141,4	8752,7	15,8%
1005 maize	18281213	85361,8	100%	85361,8	5283895,4	28,9%
1006 rice	4152980	5172,9	100%	5172,9	320202,5	7,7%
1007 grain sorghum	90000	40	100%	40	2476	2,8%
1008 other cereals	149833	98	100%	98	6066,2	4%
All raw cereals	686454453	2763075,9	100%	2763075,9	171034398	24,9%
1101 wheat flour	220750870	631350,5	129,87%	819934,9	50753970,3	23%
1102 other flours	3206048	7810,3	129,87%	10143,2	627864,1	19,6%
1103 groats, pellets	59089611	146428,9	129,87%	190167,2	11771349,7	19,9%
1104 grains otherwise worked	19838283	27417,1	100%	27417,1	1697118,5	8,6%
1107 malt	303728388	723532,8	120%	868239,4	53744018,9	17,7%
1108 starches, inulin	4788321	9547,7	142,86%	13639,8	844303,6	17,6%
19 cereals preparations	892899884	485978,3	1,667%	810125,8	50146787	5,6%
2203 beer from malt	301480144	418800,9	17%	71196,2	4407044,78	1,5%
220830 whiskies	379716064	55284,2	117%	64682,5	4003846,75	1,1%
220850 gin & geneva	14015577	6549,2	117%	7662,6	474314,94	3,4%
220860 vodka	18527284	5961,6	117%	6975,1	431758,69	2,3%
Total	2904494927	5281737,4		5653259,7	349936775	12%

4.2- The EU dumping on its dairy exports

4.2.1 – The EU dumping to all dairy exports

The EU exported in 2012 3,402 Mt of dairy products for €8.813 bn, of which 516 Mt of non concentrated milk and cream (code 0401) for €444 M, 1.203 Mt of concentrated milk (code 0402) for €3 bn, 0.156 Mt of fresh products (code 0403) for €289 M, 0.543 Mt of concentrated whey (code 0404) for €893 M, 0.127 Mt of butter (code 0405) for €510 M, 0.777 Mt of cheese (code 0406) for 3.618 bn and 80.765 t of casein and caseinate for €542 M. The average FOB price of dairy products was 2,590 €/t. We did not take into account in time of the exports of lactose (code 170211) which were of 0.142 Mt for €245.4 M€. In fact total exports of dairy products were much higher but we have not been able to identify, by lack of data, as we did for cereals, all those incorporated into the exports of other processed food: biscuits, pastry, chocolate, confectionary, prepared dishes, milk feed for calves, etc.

Table 11 – EU dairy exports and subsidies to all countries per type of product in 2012

	0401	0402	040210	0402-040210	0403	0404	0405	0406	3501	Total
€ million	443,9	3005,9	1278	1727,9	288,6	893	509,7	3617,7	54,2	8813
1000 t	516	1203	523,5	679,5	156	543	127	776,5	80,8	3402,3
FOB price: €/t	860,3	2499	2441	2543	1850	1645	4012	4659	6712	2590
T of m.e./t product	1	6,2	5	7,1	2,1	2,5	11,4	8,2	14	5,5
1000 t in m.e.	516	7441	2616,5	4824,5	327,6	1357,5	1447,8	6367,3	1130,7	18587,9
FOB price me €/t	860,3	404	488,4	358,2	881	657,8	352,1	568,2	479,4	474,1
Subsidies: €1000	26574	383212	134750	248462	16871	69911	74562	327916	58232	957278
Dumping rate	6%	12.7%	10.5%	14.4%	5.8%	7.8%	14.6%	9.1%	10,7%	10,9%

Source: Eurostat

To assess the export subsidies we must first convert into tonnes of milk equivalent (t.m.e.) the various types of dairy products exported. The French "Office de l'élevage" uses "milk equivalent" conversion factors in useful solid matter, after a calculus of the protein and fat matter contents of each dairy product, but does not seem to apply the t.m.e. to each type of dairy exports. We have retained the following coefficients: 5 kg of milk for one kg of skimmed milk powder (SMP), 7.1 kg for fat milk powder, 11.4 kg for butter, 8.2 kg for cheese, 14% for casein (which seems to be underestimated). Table 11 shows that the 3.402 Mt exported had an equivalent of 18.588 Mt of milk, with an average m.e. ratio of 5.5. These dairy exports in t.m.e. represented 13.28% of the EU production of 140 Mt of cow milk. The average FOB price of m.e. was of 474.1 €/t of milk. From table 8 we see that the dumping rate due to the feed subsidy of €17.5 per t of m.e. was of 3.7% of the FOB price in m.e.

Besides the feed subsidies the EU15 milk producers received direct payments per kg of milk since 2004, which were transferred in 2007 to the SPS, and hence are fixed. The 10 new Member States which joined the EU in 2004 (Bulgaria and Romania joined in 2007) did not avail of direct payments (for milk as well as for bovine meat or cereals) on the argument that these payments were granted to compensate the reductions in intervention prices before their adhesion. Instead they received the SAPS (single area payment scheme), a decoupled flat-rate payment per ha increasing along a phasing-in period allowing them allegedly to catch up the level of the EU15 SPS per ha, which is in fact not true because the SAPS per ha was based on much lower yields of crops per ha or per cattle head or dairy cow before their adhesion. In fact their anticipated payment per ha in 2016 from EU funds for the "first pillar" (outside rural development funds of the second pillar) would be €182 against €295 in the EU15 and €262 in the EU27. Even if they could top-up the EU funds by complementary national direct payments (CNDPs), partially financed from their EU envelope of rural development funds from 2004 to 2006 but not after, they lagged still much behind the EU15. And the CNDP went

much more to crops than to animals, which was also the case for the SAPS because, being decoupled from production, arable crops generate more revenues than pastures. In any case there is no reason to take into account their State aids as it is not done for the EU15.

The fodder area – which includes fodder crops (of which forage maize and pulses but not cereals and oilseeds), grass and permanent grassland and meadows – accounted in 2010 for 15.946 M ha or 33.3% of the used agricultural area of 47,892 M ha in the EU10 (Malta and Slovenia opted for the SPS). Given that the SAPS was of €5.916 bn in 2012 the average SAPS/ha was €123.5 and the total SAPS for the fodder area was of €1.970. But, besides the consumption of fodder crops the meat and milk bovine cattle requires cereals and oilseed meals. However all these are feedstuffs that we cannot count as additional direct payments to the EU12 producers of milk and bovine meat as they have already been counted above in feed subsidies.

Article 68 of the health check of 2008 added €237 M in 2010 to direct payments to milk producers, for a total of €4.764 bn in 2010, a figure that we will keep for 2012. Besides €8 M of aid to storage of butter were still granted in 2012.

Divided by the 140.148 t of cow milk produced in 2012, these €4.772 bn of direct payments amounted to €34.1 per t.m.e. Given that the EU dairy exports reached 18.588 Mt of m.e. in 2012 they received €633.9 M of direct payments. Adding these €34.1 per t.m.e. to the feed subsidy of €17.4 per t.m.e. leads to a total of €51.5 per t.m.e. and total subsidies to milk producers of €957.3 M. Given that exports accounted for 13.28% of total cow milk, total export subsidies were of €127.1 M. The average dumping rate – total export subsidies to the export value – was of 10.9%, from 6% for non concentrated milk and cream to 14.6% for butter.

4.2.2 – The EU dumping to its dairy exports to ACPs

Table 12 shows that the EU exported in 2012 424,520 t of dairy products to ACPs for €887.8 M, of which 122,114 t of non concentrated milk and cream for €81,7 M, 229,177 t of concentrated milk for €664.6 M, 23,358 t of fresh products for €40.6 M, 16,753 t of concentrated whey for €25.1 M, 7,295 t of butter for €32.2 M and 25,823 t of cheese for €117.2 M.

Table 12 – Distribution of EU dairy exports to ACPs by type of product in 2012

	0401	0402	040210	0402-040210	0403	0404	0405	0406	3501	Total
€ 1000	81700	664561	122789	541772	40571	25085	32248	117178		887813
Tonnes	122114	229177	49460	179717	23358	16753	7295	25823		424520
FOB price: €/t	669	2778,5	2482,6	3014,6	1736,9	1497,3	4420,4	4537,8		2091
T of m.e./t product	1	6.6	5	7.1	2.1	2.5	11.4	8.2		4.8
T in m.e.	122114	1523291	247300	1275991	49052	41883	83163	211749		2031252
FOB price me €/t	669	436,3	496,5	424,6	827,1	598,9	387,8	553,4		437,1
Subsidies: €1000	6289	7845	12736	6571	2526	2157	4282	10905		104609
Dumping rate	7.7%	11.8%	10.4%	12.1%	6.2%	8.6%	13.3%	9.3%		11.8%

Source: Eurostat

The average FOB price of dairy was €2,091 per tonne and that in m.e. of €437.1 per tonne of milk. Applying the average subsidy of €51.5 per t of m.e. to the EU dairy exports of 2 Mt in m.e. to ACPs gives total export subsidies of €104.6 M and an average dumping rate of 11.8%, from 6.2% to fresh products (code 0403) to 13.3% to butter (code 0405).

4.3- The EU dumping on its poultry exports in 2012

4.3.1 – The EU dumping to all poultry exports

Tables 13 and 14 show that in 2012 EU total exports of poultry products amounted to 1.478 Mt for €2.406 bn, of which 1.277 Mt of poultry meat for €1.582 bn, 50,518 t of preparations (codes 160231, 160232, 160239) for €173,4 M, 12,959 t of live poultry for €302.5 M and 125,029 t of eggs for €348.6 M. In carcass weight equivalent (cwe, including shelled eggs equivalents, s.e.e.) exports were of 1,870 Mt. The average FOB price was €1,632 per t. Total feed subsidies of €403.7 M, or of €245.1 on average per t of cwe, are distributed among products according to their share of total tonnes of cwe.

The average dumping rate of feed – ratio of feed subsidies to export value – was of 18.1%, from 6.7% for preparations to 24,4% to poultry meat, which is quite substantial.

Table 13 – EU exports of poultry products to extra-EU and ACPs in 2012

	To extra-EU27		To ACPs	
	dollars	tonnes	dollars	tonnes
0105 LIVE POULTRY	302468467	12958,6	25629313	689,4
" weight in cwe: x 0.79	302468467	10237,3	25629313	544,6
020711 FRESH OR CHILLED FOWLS, NOT CUT IN PIECES	17174575	8731,1	2391868	2306,4
020712 FROZEN FOWLS, NOT CUT IN PIECES	431714129	314228,9	89835346	72948,4
020713 FRESH OR CHILLED CUTS AND OFFAL OF FOWLS	85546881	54154	26372343	31673,4
020714 FROZEN CUTS AND OFFAL OF FOWLS	683177818	714404,3	327780195	301242,9
020724 FRESH OR CHILLED TURKEYS, NOT CUT IN PIECES	1249333	425	67150	27,5
020725 FROZEN TURKEYS, NOT CUT INTO PIECES	5619666	2170,7	2059016	679,6
020726 FRESH OR CHILLED CUTS AND EDIBLE OFFAL OF TURKEYS	45417280	17236,2	12806510	10213,2
020727 FROZEN CUTS AND OFFAL OF TURKEYS	156899185	126047,9	100606931	76104,4
020741 FROZEN CUTS AND OFFAL OF FOWLS (EXCL. LIVERS)	1087148	336,6	125818	49,2
020742 FROZEN CUTS AND OFFAL OF TURKEYS (EXCL. LIVERS)	17624900	7873,1	1782590	730,4
020743 FROZEN CUTS AND OFFAL OF DUCKS, GEESE EXCL. LIVERS)	16052382	725,8	251314	13,5
020744 FRESH OR CHILLED CUTS&OFFAL OF DUCKS (EXCL. FATTY LIVER)	14104884	2525,5	471063	167,9
020745 FROZEN CUTS AND EDIBLE OFFAL OF DOMESTIC DUCKS	65355903	18850,6	1171380	526,9
020751 FRESH OR CHILLED DOMESTIC GEESE, NOT CUT IN PIECES	184637	34,2		
020752 FROZEN DOMESTIC GEESE, NOT CUT IN PIECES	2963359	748	9771	1,7
020753 FATTY LIVERS OF DOMESTIC GEESE, FRESH OR CHILLED	3182816	99	2622	0
020754 FRESH OR CHILLED CUTS&OFFAL OF GEESE (EXCL. FATTY LIVER)	522478	138,1		
020755 FROZEN CUTS AND OFFAL OF DOMESTIC GEESE	29338138	5602,1	49814	68,3
020760 MEAT AND OFFAL OF GUINEA FOWLS, FRESH, CHILLED, FROZEN	3254905	1240,7	1080699	810,5
020990 POULTRY FAT,	1458362	1172,8	65320	25,6
Sub-total meats	1581928779	1276744,6	566929750	497590
" weight in cwe: x 1,3	1581928779	1659768	566929750	646867
16022010 PREPARATIONS OF GOOSE OR DUCK LIVER	12678602	611,5	588878	31,7
160231 MEAT OR OFFAL OF TURKEYS	17336018	5459,4	1807537	631
160232 MEAT OR OFFAL OF FOWLS	127315027	40190,9	9192245	3598,3
160239 PREPARED OR PRESERVED MEAT OR OFFAL OF DUCKS, GEESE	16056738	4256,5	1695905	723,3
Sub-total preparations	173386385	50518,3	13284565	4984,3
" weight in cwe: x 1,3	173386385	65673,8	13284565	6479,6
Sub-total meats and preparations	1755315164	1340222	605843628	503264
" weight in cwe	1755315164	1720524	605843628	652396
0407 BIRDS' EGGS, IN SHELL, FRESH, PRESERVED OR COOKED	309342660	111863,3	38716648	23527,6
0408 BIRDS' EGGS, NOT IN SHELL, AND EGG YOLKS,	39219662	13165,2	1798856	3540
Sub-total eggs	348562322	125028,5	40515504	27067,6
"" weight in cwe: x 1,7 for 0408 (22381)	348562322	134244,3	40515504	29545,6
TOTAL POULTRY	2406345953	1478209	646359132	530331
" weight in cwe	2406345953	1869923	646359132	681942

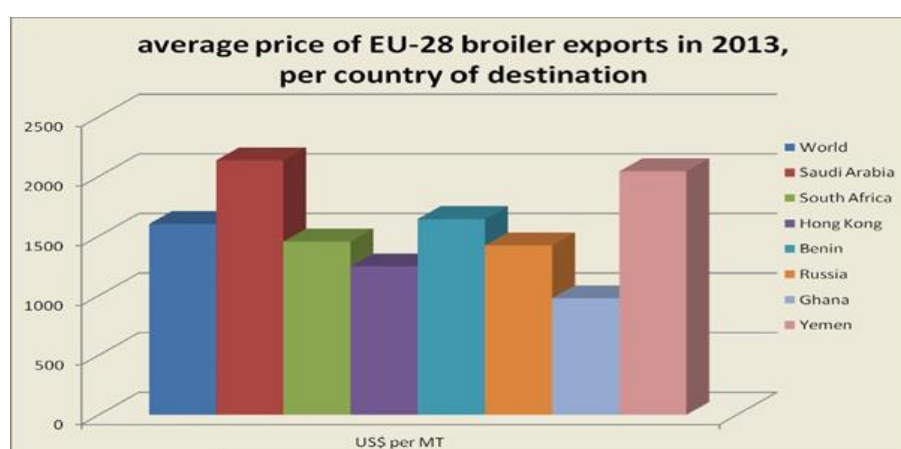
Source: Eurostat

However there were still €79.307 M of export refunds (restitutions) to poultry in 2012 and €1.819 M to eggs. Export refunds have been suspended since July 2013. Although they were legally limited to exports of frozen whole chickens to the Middle East and the Commonwealth of Independent States (ex-SSSR), the EU benefitting poultry companies – essentially the two

French Doux and Tilly-Sabco –, which are also exporting other poultry products to other countries, could well cross-subsidize partially their exports to other destinations and products as long as they were already competitive in Middle East countries.

Indeed the following graph, from an USDA report¹¹, shows that EU FOB prices were significantly higher in Saudi Arabia than for other destinations, even if the graph applies to 2013. The USDA report adds: "*It also appears that French frozen chicken exports are well suited to the Saudi market, which is looking for small birds (less than 1 kilogram, 40 days old at slaughter) which many competitors cannot supply*".

So that we can allocate the export refunds to poultry meat according to the share of each poultry meat product (respectively 96,5%, 2,9% and 0,6%), the refunds to eggs being restricted to eggs. Finally the €513 M of total subsidies to exports corresponded to an average dumping rate of 21.4%, from 2.3% for live poultry to 29.3% to poultry meat.



Source: USDA Gain report

Table 14 – Distribution of EU total poultry export subsidies in 2012 by type of product

	Poultry meat	Preparations	Live poultry	Eggs	Total
1000 tonnes	1277	50,5	13	125	1465
€ million	1582	173,4	302,5	348,6	2406
FOB price in €/t	1238,8	3433,7	21445	2788	1632
1000 t of cwe (see)	1660	65,7	10,2	134,2	1870
% of each product	88,77%	3,51%	0,55%	7,18%	100%
Feed subsidies: €M	386,5	11,7	2,4	31,2	431,9
Feed dumping rate	24.4%	6,7%	7,9%	9%	18,1%
Export refunds	76,5	2,3	4,7	1,8	81,1
Total subsidies	463	14	7,1	33	513
Total dumping rate	29.3%	8.1%	2.3%	9,5%	21.4%

Source: Eurostat

4.3.2 – The EU dumping of poultry exports to ACPs in 2012

Table 14 shows that in 2012 the EU exports of poultry products to ACPs reached 530 t for €646 M, at an average FOB price per tonne of €1,236, with 471,851 t of poultry meat and offal for €540.5 M, 4,984 t of preparations for €13.3 M, 689 t of live poultry for €25.6 M and

¹¹

http://gain.fas.usda.gov/Recent%20GAIN%20Publications/Poultry%20and%20Products%20Annual_Paris_EU-27_9-16-2013.pdf

23,068 t of eggs for €40.5 M. Given that exports to ACPs represented on average 38.70% of total poultry exports in c.w.e the corresponding €167,1 M of feed subsidies to ACP are distributed among poultry products according to their relative shares of cwe. Which shows that the dumping rate from feed subsidies – represented by the ratio of total feed subsidies to total export value – was on average of 19.8%.

As for export refunds we have underscore that it is very likely that exports to ACPs have also benefitted from a cross-subsidization despite that they were granted on exports of whole chickens to the Middle East. Given that exports to ACPs represented in 2012 36,8% of EU total poultry exports in quantity of products and 27% in value, let us assume that 32% of total export subsidies, i.e. €25,960 M, were used on exports to ACPs, where the competition among exporting countries is more severe. We distribute then the €25.378 M of export refunds among the poultry meat products according to their relative share in cwe and €0,582 M of the total specific refunds to eggs to eggs. Finally we get €145.7 M in total export subsidies and an average dumping rate of 29.9%, of which 32,4% for poultry meat.

In any case the EU Commission is not likely to object to such a transfer of export refunds as its policy has always been to grant higher export refunds to poor countries, as it has always refrained from granting them to developed countries, particularly to the U.S., which consider them as a political aggression. A good example is the "Argumentaire" that the EU Commission circulated during the WTO Ministerial conference of Seattle in December 1999: *"In fact the criticisms rarely came from importing developing countries, since their consumers benefit from EU exports and obviously if the EU did not provide such refunds then their consumers would pay more for their food because there would be less competition among exporters on these markets... Given its privileged relations with the ACP countries, the EU gives to almost all countries in sub-Saharan Africa the benefit of refunds greater than to other third countries"*¹².

Table 14 – Distribution of EU poultry exports to ACPs in 2012 by type of product

	Poultry meat	Preparations	Live poultry	Eggs	Total
Tonnes of product	497590	4984	689	27067,6	530331
Value €1,000	566930	13284	25629	40516	646359
FOB price €/t	1145,5	2937	37969	1697	1236
t of cwe (s.e.e.)	646867	4984	544,6	29545,6	681942
% of each product	94,86%	0,73%	0,08%	4,33%	100%
ACP/EU cwe export	38,97%	9,87%	5,34%	22,02%	38,70%
Feed subsid: €1000	158548,3	1221,5	133,5	7241,7	167145
Feed dumping rate	28%	9,2%	0,5%	17,9%	25,9%
Export refunds	25162,9	193,9	21,2	582	25960
Total subsid: €1000	183711	1415,4	154,7	7823,7	193105
Total dumping rate	32,4%	10,7%	0,6%	19,3%	29,9%
Share of ACPs in EU total poultry exports					
In quantity	38,97%	14,32%	5,3%	19,11%	36,75%
In value	35,84%	9,78%	8,47%	11,62%	27,02%

Source: Eurostat

The USDA report adds: *"On the other hand, exports of low-priced cuts and mechanically deboned meat (MDM) to Sub-Sahara Africa, especially South Africa and Ghana, will continue to grow. With expected exports close to 140,000 MT in CY 2013, South Africa is now becoming the largest customer of EU-28 broiler meat, close to Saudi Arabia. The EU-28 has not joined Brazil in its WTO challenge against South Africa poultry tariffs"*. Indeed, if South

¹² European Commission, *Argumentaire. Agricultural policy and trade*, 23-11-1999, 14 p.

Africa has recently raised its tariffs on poultry, which is affecting primarily Brazil from which 52% of chicken were imported in 2012, they will not affect EU exports, protected by the EU-South Africa bilateral trade agreement¹³.

4.4- The EU dumping on its exports of pig products in 2012

4.4.1- The EU dumping on its total exports of pig products

Tables 17 and 18 show that the EU exported 2879 tonnes of pig products in 2012 for a total value of €6.125 billion, at an average FOB price of €2,128 per tonne with total subsidies of €720 M, implying an average dumping rate of 11,8%. The bulk of subsidies was on feed but €18.6 M of export refunds were still present. The average subsidies per tonne of cwe was of €216.6.

Table 17 – EU exports of pig products to extra-EU and ACPs in 2012

	To extra-EU27		To ACPs	
	dollars	tonnes	dollars	tonnes
0103 LIVE SWINE	144841197	53640,5	310117	12,9
" weight in cwe: x 0.79	144841197	42376	310117	10,2
0203 MEAT OF SWINE, FRESH, CHILLED OR FROZEN	3884113199	1603193,9	139448168	89079,9
020630 FRESH OR CHILLED EDIBLE OFFAL OF SWINE	5558044	5798	590677	891,6
020641 FROZEN EDIBLE LIVERS OF SWINE	30382467	45763,5	1054806	984,4
020649 EDIBLE OFFAL OF SWINE, FROZEN	1202833777	956822,1	49564510	58494,8
Sub-total of pork meat	5122887487	2611577,5	190658161	149450,7
t of cwe: x by 1.15	5122887487	3003314,1	190658161	171868,3
021011 HAMS, SHOULDERS AND CUTS	31648372	3607,2	2470511	480,6
021012 BELLIES "STREAKY" AND CUTS	20844127	4604,4	3205119	793,2
021019 MEAT OF SWINE, SALTED, IN BRINE,	248068426	28530,6	9236755	2701,9
160100 SAUSAGES AND SIMILAR PRODUCTS, OF MEAT, OFFAL (66% of total)	300863627	104454,1	72725723	34262,8
160241 HAMS OF SWINE AND CUTS	74001391	16104,5	6722757	2004,7
160242 PREPARED OR PRESERVED SHOULDERS AND CUTS	14394417	4674,1	2997347	1033,6
160249 PREPARED OR PRESERVED MEAT AND OFFAL	167184752	51131,8	25246674	8927,7
Sub-total of pork preparations	857005112	213106,7	122604886	50204,5
t of cwe: x by 1.3	857005112	277038,7	122604886	65265,9
Total	6124733796	2878325	313573164	199668
" t of cwe:	6124733796	3322729	313573164	237144,4

Source: Eurostat

Table 18 – Distribution of EU total pork export subsidies in 2012 by type of product

	Pig meat	Preparations	Live pig	Total
1000 tonnes	2612	213,1	53,6	2879
€ million	5123	857	144,8	6125
FOB price in €/t	1961,3	4021,6	2701,5	2127,6
1000 t of cwe (see)	3003,3	277	42,4	3322,7
% of each product	90,38%	8,34%	1,28%	100%
Feed subsidies: €M	633,7	58,5	9	701,2
Feed dumping rate	12,4%	6,8%	6,2%	11,4%
Export refunds	16,8	1,6	0,2	18,6
Total subsidies	650,5	60,1	9,2	719,8
Dumping rate	12,7%	7%	6,4%	11,8%

4.4.2 – The EU dumping on its exports of pork to ACPs

The EU exported 200,000 t (199,668 t exactly) of pig products to ACPs in 2012 for €313.6 M, at an average FOB price of €1,570 per tonne.

¹³ <http://www.egfar.org/news/imported/continued-growth-projected-eu-poultry-meat-exports-africa>

Given that exports to ACPs represented on average 4.96% of total pig exports in c.w.e the corresponding €42.072 M of feed subsidies to ACPs are distributed among pig products according to their relative shares. Which shows that the dumping rate from feed subsidies – represented by the ratio of total feed subsidies to total export value – was on average of 13.4%.

Given that exports to ACPs represented in 2012 6,94% of EU total pig exports in quantity of products and 5,12% in value, let us assume that 6% of total export subsidies were used on exports to ACPs, where the competition among exporting countries is more severe. We distribute then the €43.188 M of total subsidies among the pig products according to their relative share in cwe and we get an average dumping rate of 13.8%, with an average subsidy of €216.3 per tonne of product and of €182.1 per tonne of carcasse equivalent.

Table 19 – EU subsidies to pig products exported to ACPs in 2012 by type of product

	Pork meat	Preparations	Live pig	Total
Tonnes	149451	50205	12,9	199668
€1000	190658	122605	310	313573
FOB price in €/t	1275,7	2442,1	2403,9	1570,5
tonnes of cwe (see)	171868	65266	10,2	237144
% of each product	72,47%	27,52%	0,03%	100%
Feed subsidies: €1000	30489,6	11578,2	5	42072
Feed dumping rate	16%	9,4%	1,6%	13,4%
Export refunds €1000	1063,5	51,5	2	1116
Total subsidies €1000	31553,1	11629,7	7	43188
" €/t of cwe	183,6	178,2	686,3	182,1
Total dumping rate	16,5%	9,5%	2,3%	13,8%
Share of ACPs in EU total pig products exports				
In quantity	5,72%	23,56%	2,43%	6,94%
In value	3,72%	14,31%	0,21%	5,12%

4.5 – The EU dumping on its exports of bovine products in 2012

4.5.1 – The EU dumping on its total exports of bovine products

Like for milk producers the bovine meat producers of the EU15 enjoy direct payments besides feed subsidies, even if most of these payments are also hidden in the allegedly fully decoupled SPS, but we have shown above that the EU12 new member states were not granted such direct payments. Let us identify first these EU15 direct payments.

Before the 2003 CAP reform having decided to foster the full decoupling of direct payments into the SPS implemented from 2005 in most Member States (MS) and from 2006 in the others, the producers of bovine meat were already receiving 5 types of direct payments: a suckler cow premium (SCP) with an additional suckler cow premium (ASCP); a special male bovine premium (SMBP); an extensification premium and two types of slaughter premium: for young calves and adult cattle. As they were allowed to do, 5 MS (Austria, Belgium, France, Portugal and Spain) choose to keep coupled (at 75% in France and at 100% in the other 4 MS) the SCP and ASCM and some also to keep coupled the SMBP and the slaughter premium for calves and adults. However in 2012 only the SCP and ASCP were still coupled in some MS, all the other premium having been integrated into the SPS in the EU15.

The Annex VII of the Council Regulation 1782/2003 of 29 September 2003 stated how the direct payments should be transferred to the SPS: "*Where a farmer has received livestock*

premiums and/or supplements, the amount shall be calculated by multiplying the number of determined animals for which such a payment has been granted, respectively, in each year of the reference period [2000 to 2002], by the amounts per head established for the calendar year 2002". As it is almost impossible to find the number of animals having benefitted from the various bovine animal subsidies at the EU-15 level in the base period, taking the average of the subsidies actually released in the budget years 2003 and 2004 is a good approximation of the amount defined in the regulation. The average for the two years was of €6.851 bn, of which €2.083 bn for the SCP and €75.6 M for the ASCP; of 1.937 bn for the SMBP; of €1.723 bn for the slaughter premium and of €1.032 bn for the extensification premium. The fact that the SCP and ASCP are still coupled in some MS does not change the total amount of subsidies to bovine meat. However these amounts have to be reduced by the "modulation" rate of 10% for 2012 on farms receiving more than €5,000 per year. The last figure available is for 2011 when 12% of direct payments went to the 69% of beneficiaries receiving less than €5,000. So that the total modulation was of €603 M in 2012 and the net SPS for bovine meat of €6.246 bn.

Therefore the total direct payments to bovine meat in the EU27 are restricted to the €6.246 bn received by the EU15 producers. As the bovine meat exports in c.w.e. accounted for 6.72% of the 7,578 Mt of EU27 production in 2012, the direct payments to meat exports were of €419.8 M. However there were still export refunds of €37.193 M in 2012, of which €31.490 M for bovine meat and €5.703 M for live cattle.

As we did not avail of clear technical references to distinguish between meat and preparations, our classification assumes only that products with a conversion rate in c.w.e. different from 1 is a preparation.

Table 20 – EU exports of bovine products products to extra-EU and ACPs in 2012

	To extra-EU27		To ACPs	
	dollars	tonnes	dollars	tonnes
0102 LIVE BOVINE ANIMALS	830254771	292487,8	3033463	755,2
" with weight in cwe: x 0.55	830254771	160868,3	3033463	415,4
Products with conversion rates of 1 minus the exceptions below:				
0201 MEAT OF BOVINE ANIMALS, FRESH OR CHILLED	440211740	121045,3	1164928	314
0202 MEAT OF BOVINE ANIMALS, FROZEN	213570943	69602,2	21031839	15253,9
021020 MEAT OF BOVINE ANIMALS, SALTED, IN BRINE, DRIED OR SMOKED	9977740	833,3	223983	253,8
020610 FRESH OR CHILLED EDIBLE OFFAL OF BOVINE ANIMALS	14710977	7787,4	1519679	1569,5
020621 FROZEN EDIBLE BOVINE TONGUES	10907508	2956,4	175791	84
020622 FROZEN EDIBLE BOVINE LIVERS	21321843	19394	3653816	3880,5
020629 FROZEN EDIBLE BOVINE OFFAL (EXCL. TONGUES AND LIVERS)	82751201	75656,2	26323541	33449,3
160250 PREPARED OR PRESERVED MEAT OR OFFAL OF BOVINE ANIMALS	58974077	20764,1	22470081	11771,9
Sub-total	852426029	318038,9	76563558	66576,9
Minus the following products with other cwe : net cwe=1	506795464	224236,8	45835728	48556,8
Minus products with cwe=1,3:				
02013000 FRESH OR CHILLED BOVINE MEAT, BONELESS	121884292	23673,6	697497	130,9
02023010 FROZEN BOVINE BONELESS FOREQUARTERS, WHOLE OR CUT	4794188	1150,7	238041	105,8
02023050 FROZEN BOVINE BONELESS... AND BRISKET CUTS	4086962	1899,5	335890	332,6
02023090 FROZEN BOVINE BONELESS MEAT	164454680	50471,2	14590028	8352,5
02102010 MEAT OF BOVINE ANIMALS, SALTED... WITH BONE IN	338670	240,4	145183	195,2
Sub-total	295558792	77435,4	16006639	9117
" with quantity in cwe	295558792	100666	16006639	11852,1
Minus products with cwe of 1,7:				
02102090 BONELESS MEAT OF BOVINE ANIMALS...	9639070	592,8	78800	58,6
" with quantity in cwe	9639070	1007,8	78800	99,6
Minus products with cwe of 0,8:				
16025095 MEAT OR OFFAL OF BOVINE ANIMALS, PREPARED OR PRESERVED	40432703	15773,9	14642391	8844,5
" with quantity in cwe	40432703	12619,1	15358569	7320,3
Total	1682680800	610526,9	79597021	67332,1
Total with quantity in cwe	1682680800	499398	79597021	68244,2

Source: Eurostat

Finally table 21 shows that the EU exports of bovine products to all destinations reached in 2012 €719.3 M with the large average dumping rate of 42,7%. But we must underscore that almost half of these exports were of life cattle.

Table 21 – EU export subsidies to bovine products to extra-EU in 2012 by type of product

	Beef	Preparations				Total meat	Live cattle	Total
	Cwe=1	Cwe=0.8	Cwe=1.3	Cwe=1.7	Total			
Tonnes	224236,8	15773,9	77435,4	592,8	93802,1	318038,9	292488	610526,9
€1000	506795,5	40432,7	295558,8	9639,1	345630,6	852426,1	830254,8	1682680,8
FOB price in €/t	2260,1	2563,3	3816,8	16260,3	3684,7	2680,3	2838,6	2756,1
1000 t cwe (see)	224236,8	12619,1	100666	1007,8	114293	338529,7	160868,3	499398
% of each product	44,90%	2,53%	20,16%	0,20%	22,89%	67,79%	32,21%	100%
Feed subs: €1000	117804	6629	52885	530	60044	177848	84513	262361
Feed dumping	14,4%	16,4%	17,9%	5,5%	17,4%	15,3%	10,2%	12,9%
Export refunds	20858,5	1173,8	9363,9	93,9	10631,6	31490,1	5703	37193
Direct payments	188480	10607	84614	847	96068	284548	135216	419764
Total subsidies	327142,5	18409,8	146862,9	1470,9	166743,6	493886,1	225432	719318
" per t product	1458,9	1167,1	1896,6	2481,3	1777,6	1552,9	770,7	1178,2
Dumping rate	64,6%	45,5%	49,7%	15,3%	48,2%	57,9%	27,2%	42,7%

Source: Eurostat

Given that exports to ACPs represented in 2012 11,03% of EU total bovine exports in quantity of products and 4,73% in value, let us assume that at least 7.79% of total subsidies, i.e. €56.678 M, were used on exports to ACPs, where the competition among exporting countries is severe and where we have already mentioned that the EU Commission is prone to subsidize more its exports. Even if the quality of bovine products exported to ACPs is much lower than that of total extra-EU27 exports, as reflected by an average FOB price 2.3 times lower: €1,182 per tonne against €2,756. We distribute then the total subsidies among the bovine products according to their relative share in cwe and we get the huge average dumping rate of 71,2% with an average subsidy per tonne of €841.8.

Table 22 – EU export subsidies to bovine products to ACPs in 2012 by type of product

	Beef	Preparations				Total meat	Live cattle	Total
	cwe=1	cwe=0.8	cwe=1.3	cwe=1.7	Total			
tonnes	48556,8	8844,5	9117	58,6	18020,1	66576,9	755,2	67332,1
€1000	45835,8	14642,4	16006,6	78,8	30727,8	76563,6	3033,5	79597,1
FOB price in €/t	944	1655,5	5328,5	1344,7	1705,2	1150	4016,8	1182,2
t cwe (see)	48556,8	7320,3	11852,1	99,6	19272	67828,8	415,4	68244,2
"% each product	71,15%	10,73%	17,37%	0,15%	28,24%	99,39%	0,61%	100%
Total subsidies	40326,4	6081,5	9845	85	16005,9	56332,3	345,7	56678
" per t of product	830,4	687,6	1079,8	1450,8	888,2	846,1	457,8	841,8
Dumping rate	88%	41,5%	61,5%	107,9%	52,1%	73,6%	114%	71,2%

Source: Eurostat

Conclusion: EU27 export subsidies to cereals, dairy, meats in 2012: extra-EU27 & ACPs

Table 23 summarizes the EU dumping of cereals, dairy and meats to extra-EU and ACPs in 2012. We see that the EU subsidies to exports of these products has reached €4.907 bn for all extra-EU exports, of which €750.4 M to ACPs.

Given that, according to table 1, these products accounted for 55.3% of all EU agricultural exports to ACPs in 2012 – of which 11.9% for cereals, 25.3% for milling products, 10.6% for cereals preparations, 9.9% for dairy and 7.6% for meats – implies that the total EU subsidies on agricultural exports to ACP has very likely exceeded €1 bn in 2012, as the bulk of these

subsidies came from the allegedly fully decoupled SPS ad SAPS which cannot be assigned to specific products.

Table 23 – The EU dumping of cereals, dairy and meats to extra-EU and ACPs in 2012

	Cereals	Dairy	Bovine meat	Pig meat	Poultry&gg	Meats	Total
EU exports to all destinations							
Exports: 1000 t	33009	3322	610,5	2879	1466	4955,5	41286,5
Exports €1000	*	8758,8	1683	6125	2392	10200	*
FOB price	*	2637	2756	2127,6	1632	2058,3	*
1000 t of cwe	34540	17457	499,4	3322,7	1762	5584	57581
Subsidies €1000	2138035	899046	819357	479500	513000	1811857	4848938
Dumping rate	23.9% *	10.3%	40.4%	7.8%	21.4%	32,4%	
EU exports to ACPs							
Exports: t	5281737	424520	67332	199668	530331	797331	6503588
Exports €1000	*	887813	79597	313573	646359	1039529	*
FOB price	*	2091	1182	2404	1236	1304	*
Tonnes of cwe	5653260	2031252	68244	237144	681942	987330	8671842
Subsidies €1000	349937	107459	56678	43188	193105	292971	750367
Dumping rate	24,9%*	11.8%	71.2%	13.8%	29.9%	28.2%	*
Share of ACPs in EU export subsidies							
In subsidies	16.4%	11.6%	8.5%	6%	37.6%	16.2%	15.4%

Source: Eurostat; * giving a total export value of processed products from cereals would not be meaningful as their share of cereals in very differentiated.

At a time when the EU is exerting excessive pressures on ACPs to sign and ratify regional EPAs before the 1 October 2014, it is timely to compare this EU dumping with the commitments of the EU Member States within the ACP-EU Council of Ministers of 6-7 June 2013 on the 11th European Development Fund for the 7 years 2014-20. They adopted an envelope of €29.089 bn in current euros for ACPs. Divided by 7 years means €4.156 bn per year. And divided by the exactly one billion inhabitants of the ACPs at mid-term of the 11th EDF on 30 June 2017, this would amount to just €4,2 per year. In fact it would be less, taking into account a likely average inflation rate of 2%, the actual real amount would be only of €25.324 bn in 2020 and the average real amount of 26.895 bn, which, divided by 7 years, would make €3.842 bn per year and €3.842 per inhabitant per year, the price of few small candies!

In other words the €750.4 M of agricultural export subsidies here justified for cereals, dairy and meats represent already 19.5% of the expected annual EDF and in fact 26% if we consider that the actual subsidies for all agricultural exports are likely of €1 billion or 26% of the actual average EDF.

Because we could have added other products such as sugar, including that incorporated in other exported processed products. The SPS per hectare of EU27 is at least of €400 (it is of €525 in France); 1.5 million ha were cultivated in sugar beet in 2012 with an average yield of 12.1 tonnes of sugar per hectare, which made 18.150 Mt of sugar and an average SPS of €33.1 per tonne and total SPS of €612.4 M. Besides, there were €109.5 M of market interventions on sugar and €23 of additional coupled direct payments to producers, making a total of €744.9 M and a subsidy per tonne of €41.04. As the EU exported 1.937 Mt of sugar in 2012 – not to mention that incorporated in biscuits, pastry, chocolate, confectionery, etc. – or 10.7% of production, this corresponds to export subsidies of €79.5 M. Although the EU was a net importer of 1.405 Mt of ACP sugar in 2012, it nevertheless exported to them 210,016 tonnes with a subsidy of €8.6 M. This is much better for ACPs than in 2009 when there were €179 M of export refunds on sugar, reduced to €9.8 M in 2010 and €1.5 M in 2011.

Annex: The EU subsidies on its cotton exports in 2012 and impact on ACPs

Table 23 presents the evolution of EU27 production, trade, subsidies and dumping rate of cotton lint from 2000 to 2012.

The EU is by far the unchallenged world champion of cotton dumping per tonne, as it has been on average twice its FOB price from 2006 to 2012: €2,557 € against €1,234. And although the subsidy per tonne has fallen to €1,763 in 2012 – because production has jumped from 291,000 t to 430,000 t –, the 342,800 tonnes exported have mobilized €604 M of subsidies. In fact the EU was a net exporter of 210,500 t of cotton in 2012.

Table 24 – The EU27 subsidies to the exported cotton lint from 2000 to 2012

1000 tonnes et million €	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Production 1000 tonnes	530	563	539	462	507	524	395	327	259	242	222	291	430
Imports "	961,4	879,8	888,1	703,1	544,4	462,2	355,9	338,7	229,8	150,3	164,4	174,6	132,3
Exports "	193,7	203,3	168,8	219,3	262	263,2	318,4	164,2	214,7	301,6	243,1	163,3	342,8
Balance "	-767,7	-676,5	-719,3	-483,8	-282,4	-199	-37,5	-174,5	-15,1	151,3	78,7	-11,3	210,5
Exportats/production	36,5%	36,1%	31,3%	47,5%	51,7%	50,2%	80,6%	50,2%	82,9%	124,6%	109,5%	56,1%	79,7%
Consumption "	1297,7	1239,5	1258,3	945,8	789,4	723	432,5	501,5	274,1	90,7	143,3	302,3	219,5
Subsidies to cotton	855	733	804	872,6	835,3	952	914,6	917	750	719	723,7	757,3	757,9
" decoupled (SPS)								502	502	502	502	502	502
" blue box							-	254,5	247,5	216,9	221,7	247,3	245,8
" amber box	855	733	804	872,6	835,3	952	914,6						
Restructuring aid								-	-	-	10	10	10,1
Subsidies in €/t	1613,2	1302	1491,7	1888,7	1647,5	1816,8	2315,4	2804,3	2895,8	2971,1	3259,9	2602,4	1762,6
Subsidies to exports	312,5	264,7	251,8	414,2	431,6	478,2	737,2	460,5	621,7	896,1	792,5	425	604,2
Production value €M	1385,9	1301,9	1159,1	1226,1	1135,1	1116,5	368,7	397,7	199,2	214,3	396	476,3	
Export value M€	226,4	212,4	173,9	265,6	281,2	253,3	312,6	163,8	225,3	284,8	395	290,8	485,6
FOB price €/t	1168,8	1044,8	1030,2	1211,1	1073,3	962,4	981,8	997,6	1049,4	944,3	1624,8	1780,8	1416,6
Dumping rate	138%	124,6%	144,8%	155,9%	153,5%	188,8%	235,8%	281,1%	275,9%	314,7%	200,6%	146,2%	124,4%

When CTA (Technical Centre for Agricultural and Rural Cooperation ACP-EU) wrote in December 2013 that, "*According to ICAC estimates, direct subsidies to Greek cotton producers reached US\$266 million in 2011/12, down from US\$280 million in 2010/11... The comparative figures for Spain are around US\$89 million in 2011/12, down from US\$93 million in 2010/11*"¹⁴, if forgot deliberately the €502 M€ hidden in the SPS. Indeed for ICAC the US fixed direct payments are not a production subsidy: "*Direct payments (income aid) are dissociated from current production and are not considered as a production subsidy*"¹⁵. Yet the WTO Appellate Body Report of 3 March 2005, in the US cotton case, underscored that "*During the oral hearing, the United States accepted that farmers decide what to plant based on expected market prices as well as expected subsidies*" (paragraph 440)¹⁶. Now the main subsidies on which the US producers can rely for sure are precisely the fixed direct payments, whereas coupled aids (marketing loans and contra-cyclical payments) are dependent on the vagaries of market prices. Which is even clearer for the SPS in the EU.

Clearly the EU does not export raw cotton to the ACPs (182 t in 2012!) but was a net importer of 30,156 t for €52 M. However the EU exports to ACPs much cotton yarn and fabric together with some clothing and linen articles so that it has got a surplus of €260 M in 2012, of which a deficit of €55.1 M on raw cotton, carded or combed cotton and cotton wastes, but a surplus of €286.8 M on yarn and fabric and another surplus of €28.1 M on clothing and linen. However, after conversion in cotton fiber equivalent of exports of yarn, fabric, clothing and linen, the net surplus was of €195.4 M.

¹⁴ <http://agritrade.cta.int/Agriculture/Commodities/Cotton/Executive-Brief-Update-2013-Cotton-sector>

¹⁵ https://www.icac.org/cotton_info/publications/statistics/stats_wtd/gm-f_2012.pdf

¹⁶ WT/DS267/AB/R, 3 March 2005

Given that the EU exported to ACPs 17,141 t of cotton fiber equivalent, total subsidy to those exports was of €30.220 M, which is to be added to the €750 M calculated above for exports of cereals, dairy and meats. Let us remark that these €30 M represent 53.6% of ACPs exports to the EU of raw cotton in 2012, including carded or combed cotton and cotton wastes.

Table 25 – EU-ACPs trade in cotton products in 2012

	Cotton fiber				Yarn and fabric			Clothing and linen			Total cotton
	raw	carded-combed	wastes	Total	product	% cotton	Total cotton	Product	% cotton	cotton	
Trade in tonnes											
Exports	182	30,2	271,8	484	14968,4	80%	11975	6242,1	75%	4681,6	17141
Imports	30337	336,5	4028,7	34702,2	36422,7	"	29138	2807,9	"	2105,9	65946
Balance	-30156	-306,3	-3756,9	-34219,2	-21454,2	"	-17163	3434,2	"	2575,7	-48807
Trade in €1,000											
Exports	757	166,6	329,4	1253	357133	"	285706	98614	"	73961	360920
Imports	52716	538,8	3077,2	56332	70365	"	56292	70494	"	52870	165494
Balance	-51959	-372,2	-2747,8	-55079	286766	"	229413	28121	"	21090	195424

Clearly the EU is a small provider of cotton products to ACPs but ACPs themselves provided only 2.4% of the €2.950 bn of cotton products – excluding clothing and linen – imported by the EU in 2012, against 24.5% from Turkey, 16% from Pakistan, 14.7% from India, 12.2% from China and 4.7% Egypt.

The EU presents its cotton policy to ACPs as follows: "*Internationally, the EU is a minor player, contributing only about 2 % to the world's total production of cotton. This implies that the impact of EU production on the evolution of world market prices has been negligible. This is further strengthened by the fact that the EU does not use export subsidies for this sector and offers duty free access. The EU supports C4 (Benin, Burkina Faso, Chad and Mali) and other African cotton producing countries through the EU-Africa Cotton Partnership, which has led to the mobilisation of more than EUR 300 million for development of the cotton sector*"¹⁷, the exact figure being of €327 M¹⁸. However this figure concerns the 9 years 2004 to 2012 and the average annual amount of €36.3 M is very likely lower than the average annual level of EU subsidies to the cotton products exported to ACPs as the EU average FOB price of raw cotton for these 9 years has been of €2,453 per tonne (table 25), exceeding by 39% the 2012 FOB price.

Besides the new ECOWAS common external tariff (CET) has only put in the fifth band of 35% 5 tariff lines of the textile-clothing chain, those concerning the fabric printed with wax, for which the international competition is likely very low. If all tariff lines of the clothing and linen segment are in the 20% band, raw cotton is in the 5% band and most yarn and fabric lines are in the 10% band. At the same time the US MFN (most favored nations, excluding preferential agreements) is of 28.2%, 32% or 19.7%+€4,970 per tonne on many tariff lines of clothing and linen. However the EU tariff lines are much lower than the US ones.

¹⁷ http://ec.europa.eu/agriculture/developing-countries/commodities/index_en.htm

¹⁸ http://www.acp-coton.org/sites/default/files/news/downloads/infocoton_ndeg22.pdf