



The EU28 dumping of cereals, dairy and meat to Cariforum in 2016

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We will concentrate on cereals, dairy products, meats and eggs.

A preliminary observation is that financial year 2016 was the first year of implementation of all the schemes under the reformed structure of direct payments as decided in the 2013 CAP reform. The main schemes are the single area payment scheme (SAPS), the basic payment scheme (BPS), the payment for agricultural practices beneficial for the climate and the environment, the redistributive payment and the payment for young farmers.

I – The EU dumping of cereal products to Cariforum in 2016

However if, on the one hand, the new CAP implemented in 2016 has reduced by 9.4% the amount of total decoupled direct payments in relation to 2014, on the other hand the EU28 production of cereals was also lower by 9.4% in 2016 (of which by 20% in France) in relation to 2014 so that the subsidy per tonne of cereal should be about the same. The more so as we did not take into account several components of the second pillar of the CAP on rural development and the so-called *de minimis* aids which are not notified to the EU Commission in the State aids, but which have been significant in the last years, and particularly in 2016, for cereals and milk, notably in France.

Table 1 and table 2 present the EU28 exports of raw and processed cereals to Cariforum Member States (MS) in 2016. The dumping rate is calculated as the ratio of subsidies to the export value of raw cereals equivalent (RCE) of processed products. SOL calculated in May 2015 that the subsidy per tonne of cereals was of 66.75 €/t in 2014 in the EU15 minus Germany, of which 59.81 €/t for direct aids and 6.94% for transversal coupled subsidies to cereals (for the share they represent in the value of total agricultural production)¹ and of €60,35 per tonne taking into account the lower subsidy/t of Germany and the new MS. We could therefore keep this subsidy of 66.75 €/t for 2016 for France and the EU15 MS other than Germany.

But Eurostat data allow to identify the specific EU28 MS having exported cereals products (raw cereals and processed cereals in RCE to Cariforum in 2016 as well as the Cariforum MS having imported these products. Table 1 shows that the EU exports of raw cereals in quantity were relatively low, at 19021 tonnes (t), table 2 that exports of processed cereals in quantity of RCE were whereas table 3 shows that the exports of RCE were 7.6 times larger (128 508 t) so that the share of exports of raw cereals was only 12.9% of total RCE of 147 592 t.

¹ SOL, *Reappraisal of the UE dumping on cereals to West Africa from 2006 to 2014*, 28 May 2015, <https://www.sol-asso.fr/articles-de-2015/>; SOL, *The subsidies to the EU exports of cereal products to West Africa in 2015 and 2016*, March 17, 2017, <https://www.sol-asso.fr/analyses-politiques-agricoles-jacques-b-2/>

Table 1 – EU28 Member States exports of raw cereals to Cariforum in 2016

In 100 kg	wheat	barley	oats	maize	rice	other cereals	Total raw cereals
EU28	159732	26682	510	1024	1678	584	190210
Austria							
Belgium		23520			19	139	23678
Bulgaria							
Czech Rep.							
Germany	155383				100		155483
Denmark							
Estonia							
Spain			1	24	440	1	466
Finland							
France		3162		1000	23	0	4185
United Kingdom			163				163
Greece							
Croatia							
Hungary							
Ireland							
Italy					929	33	962
Lithuania							
Latvia							
Malta							
Netherlands					929	33	962
Poland			346		131	411	888
Portugal	4349						4349
Romania							
Sweden							
Slovakia					36		36

Table 2 – EU28 Member States exports of processed cereal products to Cariforum in 2016

	1101	1102	1103	1104	1107	1108	1109	19	190110	19019099	2203	2208	All processed	All cereals
	wheat flour	other flours	groats	other processed	malt	cereal starch	gluten	cereals preparations	Infant formula	cereal part	beer	spirits*		
EU28	43802	1276	36499	17610	546877	5299	6821	356597	34053	172168	118874	104949	1444825	1635035
Austria								46			397		443	443
Belgium	958	2		13	119746	0	2040	10084	282	5122	8744	194	147185	170863
Bulgaria								227			9		236	236
Czech Rep.					167			256		115	309		847	847
Germany	1130		14	6367	61528	78	3135	11687		55	14185	145	98324	253807
Denmark					58945			27840	18867	7146	788	1	113587	113587
Estonia											2		2	2
Spain	21110	1	40	67	5	3723		30994	106	4868	1980	966	63860	64326
Finland												231	231	231
France	3045	20	36000	0	178880		846	21498	6588	9776	712	6218	263583	267768
Un.Kingdom	205	22	151	9455	44142	1		29871		1261	2947	80932	168987	169150
Greece								963			323	13	1299	1299
Croatia								871		871			1742	1742
Hungary								2		1			3	3
Ireland								6239	3419	2820	0	259	12737	12737
Italy	347		174			210		48324	10	9336	61	166	58418	59380
Lithuania							400	1319		1144		152	3225	3225
Latvia	154			259				480				5136	6029	6029
Malta								579					579	579
Netherlands	16618	1231	120	1449	10888	1287	400	152469	2145	121733	88391	1052	397783	398745
Poland	235				5984			10075	2631	7330	6	38	26299	27187
Portugal								2733	5	590			3328	7677
Romania								18					18	18
Sweden								22				9446	76060	76060
Slovakia											20		20	56

Source: Eurostat. * spirits: whisky, gin & genever, vodka.

Table 3 converts the processed cereals products in RCE. If we take the same average subsidy of 60.35 €/t as in 2014, total subsidies would be of €8.907 M which, related to the FOB export value of €30,675 M for total raw cereals (including those in processed cereals), would make a dumping rate of 29%.

However, with the same average subsidy per tonne identified in 2014 but taking into account the different shares of RCE exports of the EU15, Germany and new EU13 MS, total subsidies would be of €9.523 M with an average subsidy of 64.5 €/t and a dumping rate of 31%. The exports of the 13 new MS have accounted for only 2.6% of RCE exports and 2% of subsidies, Germany for 20.2% of RCE exports and 16.5% of subsidies (with an average subsidy of 56.9 €/t) and the EU14 (EU15 less Germany) for 78.8% of RCE exports and 81.6% of subsidies, with an average subsidy of 66.75 €/t.

Table 3 – EU28 MS exports of processed cereals to Cariforum: raw cereals equivalent (RCE) in 2016

In 100 kg	1101	1102	1103	1104	1107	1108	1109	19	190110	19019099	2203	2208	processed	RCE
RCE rate	1,33	1,33	1,33	1,02	1,15	1,18	10	0,64949	0,5	0,4	0,17	1,12		
EU28	58256,7	1697,1	48543,7	17962,2	628908,6	6252,8	68210	231606,2	17026,5	68867,2	20208,6	117542,9	1285082	1475922
Austria								29,9			67,5	0		97,4
Belgium	1274,1	2,7		13,3	137707,9		20400	6549,5	141	2048,8	1486,5	217,28	169841	193519
Bulgaria								147,4			1,5		149	149
Czech Rep.					192,1			166,3		46	52,5		456,8	456,8
Germany	1502,9		18,6	6494,3	70757,2	92	31350	7590,7		22	2411,5	162,4	120401,5	275885
Denmark					67786,8			18081,8	9433,5	2858,4	134	1,1	98295,5	98295,5
Estonia											0,3	0	0,3	0,3
Spain	28076,3	1,3	53,2	68,3	5,8	4993,1		20130,4	53	1947,2	336,6	1081,9	56147,1	56613
Finland												258,7	258,7	258,7
France	4049,9	26,6	47880	0	205712		8460	13962,7	3294	3910,4	121,04	6964,2	294380,8	298566
Un.Kingdom	272,7	29,3	200,8	9644,1	50763,3	1,1		19400,9		504,4	501	90643,8	171961,5	172124
Greece								963			323	4	1290	1290
Croatia								871		871			1742	1742
Hungary								1,3		0,4			1,7	1,7
Ireland								4052,2	1709,5	1128		290,1	7179,7	7179,7
Italy	461,5		231,4					31386	5	3734,4	10,47	185,9	36014,6	36977
Lithuania					247,8	4000		856,7		457,6		170,2	5732,3	5732,3
Latvia								311,8				5752,3	6533,1	6533,1
Malta								376,1				0	376,1	376,1
Netherlands	22101,9	1637,2	159,6	1478	12521,2	1518,7	4000	99027,1	1072,5	48693,2	15026,5	1178,2	208414,1	209302
Poland	312,6				6881,6			6543,6	1315,5	2932	1	42,6	18028,8	22378
Portugal								1775	3	236		0	2013,6	2013,6
Romania								11,7				0	11,7	11,7
Sweden					76580,8			14,3				10579,5	87174,6	87211
Slovakia											3,4	3,4	3,4	3,4

Source: Eurostat

Now tables 4, 5 and 6 show the Cariforum MS which imported the EU28 raw and processed cereals and those processed in RCE in 2016. Table 1 shows that Surinam received 82% of Cariforum imports of raw cereals, essentially wheat, followed by Jamaica (14,1%), essentially barley, Sta Lucia (2,8%, mainly wheat) and Dominican Republic (0,8%, essentially rice).

Table 4 – EU28 Member States exports of raw cereals to Cariforum in 2016

In 100 kg	wheat	barley	oats	maize	rice	other cereals	Total raw cereals
Cariforum	159732	26682	510	1024	1678	584	190210
Antigua & Barbuda							
Barbados							
Bahamas							
Belize							
Dominica					0		0
Dominican Republic	0		1		1492	34	1527
Grenada							
Guyana					36		36
Haiti					15		15
Jamaica		26505	346	24			26875
St Kitts & Nevis							
Sta Lucia	4349			1000			5349
Suriname	155383	177			135	298	155993
Trinidad & Tobago			163			252	415
St Vincent & Grenadines							

Table 5 shows that the main importers of processed cereals were Dominican Republic (25.3%), Haiti (21.4%), Trinidad & Tobago (13.8%) and Surinam (12%) and the main importers of all cereals products were Dominican Republic (22%), Surinam (21.4%), Haiti (18.6%), Trinidad & Tobago (12%) and Jamaica (8.6%).

Table 5 – Cariforum MS imports of processed cereal products from the EU28 in 2016

In 100 kg	1101	1102	1103	1104	1107	1108	1109	19	190110	19019099	2203	2208	All processed	All cereals
Cariforum	43802	1276	36499	17610	546877	5299	6821	356597	34053	172168	118874	104949	1238604	1428814
Antigua & Barbuda			23	1044				3773		17	3287	2887	11014	11014
Barbados	33	4	57	718	26468	101		5429		752	4083	2481	39374	39374
Bahamas					33576	1185		12392		1144	251	4673	52077	52077
Belize					5717			12224	97	11175	1994	873	20808	20808
Dominica			19	459	2485			7348		6224	30	82	10423	10423
Dominican Republic	23948	13	235	178	75619	81	2620	114378	22736	24458	29106	66673	312851	314378
Grenada				527	9685			1835	2	785	258	22	12327	12327
Guyana	5145			2406	33864		568	2381	26	530	1004	108	45476	45512
Haiti	1512	21	36000	262	99896		13	117048	5532	106629	8231	2288	265271	265286
Jamaica			53	2222	76695	3150	95	11615	1283	3321	1244	1428	96502	123377
Kitts&Nevis				417	8275			680			129	507	10008	10008
Sta Lucia	1059	6		258	20723		5	1969		224	539	1660	26219	31568
Suriname	11966	1214	112	3255	26511	1	200	37619	4359	2332	56264	12073	149215	305208
Trinidad & Tobago	139	18		5687	114562	781	3320	25056	18	12407	12448	9187	171198	171613
Vincent&Grenadines				177	12801			2850		2170	6	7	15841	15841

Table 6 shows the processed and total imports in RCE of Cariforum MS in 2016. The Dominican Republic leads with 25% of processed cereals and 21.8% of all raw and processed cereals, followed by Haiti (22.6% and 19.7% respectively), Surinam (8.1% and 17.6%), Trinidad & Tobago (16% and 14%) and Jamaica (8.3% and 9%). By and large their shares of the EU total subsidies of €9.523 M are the same: €2.076 M for the Dominican Republic, €1.876 M for Haiti, €1.676 M for Surinam, €1.333 for Trinidad & Tobago and €0.857 M for Jamaica.

Table 6 – Cariforum MS imports of processed cereal products in RCE from the EU28 in 2016

In 100 kg	1101	1102	1103	1104	1107	1108	1109	19	190110	19019099	2203	2208	All processed	All cereals
RCE rate	1,33	1,33	1,33	1,02	1,15	1,18	10	0,64949	0,5	0,4	0,17	1,12		
Cariforum	58257	1697	48544	17962	628909	6253	68210	231606	17027	68867	20209	117543	1285082	1475292
Antigua & Barbuda			30,6	1064,9	0	0	0	2450,5	0	6,8	558,8	3233,4	7345	7345
Barbados	43,9	5,3	75,8	732,4	30438,2	119,2	0	3526,1	0	300,8	694,1	2778,7	38714,5	38714,5
Bahamas					38612,4	1398,3	0	8048,5	0	457,6	42,7	5233,8	53793,2	53793,2
Belize					6574,6	0	0	7939,4	48,5	4470	339	977,8	20349,2	20349,2
Dominica			25,3	468,2	2857,8	0	0	4772,5	0	2489,6	5,1	91,8	10710,2	10710,2
Dominican Rep.	31850,8	17,3	312,6	181,6	86961,9	95,6	26200	74287,4	11368	9783,2	4948	74673,8	320680	322207
Grenada				537,5	11137,8	0	0	1191,8	1	314	43,9	24,6	13250,6	13250,6
Guyana	6842,9	0	0	2454,1	38943,6	0	5680	1546,4	13	212	170,7	121	55983,7	56019,7
Haiti	2011	27,9	47880	267,2	114880,4	0	130	76021,5	2766	42651,6	1399,3	2562,6	290597,5	290612,5
Jamaica			70,5	2266,4	88199,3	3717	950	7543,8	641,5	1328,4	211,5	1599,4	106527,7	133402,7
Kitts&Nevis				425,3	9516,3	0	0	441,7	0	0	21,9	567,8	10973	10973
Sta Lucia	1408,5	8	0	263,2	23831,5	0	50	1278,8	0	89,6	91,6	1859,2	28880,3	34229,3
Suriname	15914,8	1614,6	149	3320,1	30487,7	1,2	2000	24433,2	2179,5	932,8	9564,9	13521,8	104119,4	260112,4
Trinidad& Tobago	184,9	23,9	0	5800,7	131746,3	921,6	33200	16273,6	9	4962,8	2116,2	10289,4	205528,5	205943,5
Vincent&Grenadines				180,5	14721,2	0	0	1851	0	868	1	7,8	17629,6	17629,6

II – The EU dumping of dairy products to Cariforum in 2016

In 2011, the University of Wageningen produced a milk report for the European Commission presenting decoupled aid per tonne of milk in 2007 for all EU27 MS. Since decoupled aid from the SPS (single payment scheme, now BPS, basic payment scheme) for the EU15 countries (plus Slovenia and Malta which have opted for SPS) are fixed – even if they have been reduced by a modulation but largely compensated for milk by special aids under Article 68 of the 2009 Health Check, plus storage aids and crisis aid since 2015, they remain valid in 2016. The more so as, according to OECD data for 2016 the EU non-product specific subsidies (on agricultural insurances, loans, fuel, investments, promotion and marketing and an estimate on irrigation) attributable to milk (accounting for 13.4% of the whole agricultural production value) were of €1.092 billion. However, the ten EU12 countries (of which Bulgaria and Romania which joined the EU on 1 January 2007) adopting the SAPS (single area payment scheme). Indeed, the SAPS was multiplied by 3.7 from 2007 (€2.082 bn) to 2015 (€7.770 bn) and it is therefore reasonable to estimate at least at €35/t the decoupled aid from those countries which did not reached this level in 2007 (Slovakia did). This results in an average subsidy of 49.79 euros per tonne of milk.

However, Wageningen University did not take into account the feed subsidies included in direct aid to cereals, oilseed meals and protein crops (COPs) of European origin consumed by dairy cows². These subsidies were shown to be €17 per tonne of milk, based on 2010 data from the Tallage report³ and a study made in 2012 for lawyers⁴, implying a total subsidy per tonne of milk equivalent €66.79. A study on export subsidies for poultry meat to SADC⁵ has shown that the WTO requires developed countries to notify subsidies to feed, which they refuse. And,

² http://ec.europa.eu/agriculture/sites/agriculture/files/evaluation/market-and-income-reports/2011/dairy-sector/fulltext_en.pdf

³ Tallage, *Modelling of feed consumption in the European Union*, November 2009, a report prepared for DG Agriculture for which "the study provided a comprehensive overview of feed consumption in the EU": http://ec.europa.eu/agriculture/analysis/external/feed/index_en.htm

⁴ J. Berthelot, *The EU feed subsidies to dairy products*, July 6, 2012, extract of a report for lawyers.

⁵ *The EU28 subsidies on its exports of poultry meat and eggs to SADC in 2016*, SOL, March 24, 2017, <https://www.sol-asso.fr/analyses-politiques-agricoles-jacques-b-2/>

although the EU says it does not subsidize its exports as it has not used export refunds since 2014, its domestic subsidies also benefit to its exported products with the same dumping effect, even if most of them, supposedly decoupled from the level of production, are unduly notified in the WTO green box. In fact this €66.79/t is underestimated as SOL has estimated that the subsidy/t of dairy exports in ME was of €79.3 in 2010.

1.1 - Subsidies to extra-EU exports of milk powder in 2016

Before evaluating subsidies on exports of all dairy products, it is necessary to start with those to milk powder to identify the conversion rate in tonnes of milk equivalent (TME) of code 0402 of the Harmonized System (HS) for concentrated milk. It groups milk powder corresponding to subheadings 040210, 040221 and 040229 and liquid condensed milk of subheadings 040291 and 040299. Milk powder is also included in sub-codes 190110 and 19019099, but as they do not belong to code 0402, they will be dealt with separately below. First we subtract liquid condensed milk (subheadings 040291 and 040299) from code 0402 to obtain total milk powder. The fat milk powder (FMP) groups subcodes 04022191, 04022199, 04022991 and 04022999. The low-fat milk powder (LFMP) is obtained by difference between the total milk powder and the FMP. The Italian consulting firm CLAL estimates the TME rate of 1 kg of fat powder (FMP) at 7.81 kg and the TME rate of LFMP, which is not necessarily totally skimmed, at 10.72⁶. And the French Ministry of Agriculture estimates the TME rate of condensed liquid milk at 2,332⁷. However the following tables have kept the data per 100 kg given by Eurostat to avoid the conversion in tonnes given that some MS exports are low.

Table 7 – EU28 MS exports of milk and concentrated milk to Cariforum in 2016

In 100 kg	Total dairy	0401	0402	040210	040221	04022191	04022199	040229	04022991	04022999	040291	040299
EU28	864045	208818	283317	39757	193431	64670	45442	239	0	222	28679	21209
Austria	5849											
Belgium	35134	11131	14264	1279	11391	1166	552				26	1568
Czech Rep.	1281	203	963								240	722
Germany	126583	69438	44380	22135	1750		1750	3		3	20005	488
Denmark	118410	1121	85766	2016	83743	40225	36650					7
Spain	43968	19416	65	16	27	27		0	0		6	16
France	55656	24235	983	125	639			0	0		2	218
Un. Kingdom	134438	74734	16165	1118	15047		1160					
Greece	1											
Croatia	871											
Hungary	66											
Ireland	38880		25160	2140	23020		500					
Italy	11132	32	35		10		10	17				8
Lithuania	1751		607									607
Netherlands	277228	6635	94929	10928	57804	23252	4820	219		219	8400	17575
Poland	11556	1296										
Portugal	725	130										
Sweden	107	38										
Slovenia	409	409										

Table 8 converts in ME the concentrated milk, the FMP and the LFMP.

We see that the average conversion rate of code 0402 in TME is of 8.12 for the EU28: 229,998 t of ME over 28,312 tonnes.

Table 9 presents the EU28 dairy exports in HS codes at 4 digits in 100 kg per MS to Cariforum.

Then table 10 converts these quantities in ME and calculates the subsidies per EU28 MS based on the subsidy per 100 kg of ME per MS identified by the University of Wageningen. Total subsidies amounted to €32.272 M which, related to the FOB export value, implies an average dumping rate of 16%.

⁶ http://www.clal.it/en/?section=dairyPROD_DWT_me

⁷ http://agriculture.gouv.fr/sites/minagri/files/documents/pdf/Coefficients_Techniques_Lait_cle8e1393.pdf

Table 8 – EU28 exports of milk powder to Cariforum in 2016 in 100 kg of milk equivalent (ME)

In 100 kg	Concentrated milk in 100 kg					Milk equivalent (ME), in 100 kg				
	402	condensed	powder	FMP	LFMP	condensed	FMP	LFMP	FMP+LFMP	402
EU28	283317	49888	233649	110334	123315	116338,8	861708,5	1321937	2183645	2299984
Austria	0	0	0	0	0	0	0	0	0	0
Belgium	14264	1594	12670	1718	10952	3717,208	13417,58	117405,4	130823	134540,2
Czech Rep.	963	962	0	0	0	2243,384	0	0	0	2243,384
Germany	44380	20493	23891	1753	22138	47789,68	13690,93	237319,4	251010,3	298800
Denmark	85766	7	85759	76875	8884	16,324	600393,8	95236,48	695630,2	695646,6
Spain	65	22	43	27	16	51,304	210,87	171,52	382,39	433,694
France	983	220	764	0	764	513,04	0	8190,08	8190,08	8703,12
Un.Kingdom	16165	0	16165	1160	15005	0	9059,6	160853,6	169913,2	169913,2
Greece	0	0	0	0	0	0	0	0	0	0
Croatia	0	0	0	0	0	0	0	0	0	0
Hungary	0	0	0	0	0	0	0	0	0	0
Ireland	25160	0	25160	500	24660	0	3905	264355,2	268260,2	268260,2
Italy	35	8	27	10	17	18,656	78,1	182,24	260,34	278,996
Lithuania	607	607	0	0	0	1415,524	0	0	0	1415,524
Netherlands	94929	25975	69170	28291	40879	60573,7	220952,7	438222,9	659175,6	719749,3
Poland										
Portugal										
Sweden										
Slovenia										

Table 9 – Extra-EU28 dairy exports per Member State to Cariforum in 2016

In 100 kg	0401	0402	0403	0404	0405	0406	190110	19019099	2105	3501	Total
EU28	208818	283317	9519	7540	13680	130468	34053	172168	3958	524	5849
Austria						5849					45785
Belgium	11131	14264	500	500	397		282	5122	161		1484
Czech Rep.	203	963						115			195999
Germany	69438	44380	1789	22	185	9486		55	706	522	119531
Denmark	1121	85766			406	5104	18867	7146			63384
Spain	19416	65	2790		270	16453	106	4868	0		77647
France	24235	983	759	2244	3594	5356	6588	9776	2121		209172
Un.Kingdom	74734	16165	412		3319	38054		1261	493	0	1
Greece						1			0		871
Croatia								871			1
Hungary				65				1			38880
Ireland		25160			4369	3112	3419	2820			1164
Italy	32	35	19		10	1690	10	9336	0		1751
Lithuania		607						1144			279154
Netherlands	6635	94929	3250	4709	1119	42278	2145	121733	428	2	12852
Poland	1296					299	2631	7330			855
Portugal	130						5	590			145
Sweden	38				11				49		409
Slovenia	409										

Table 10 - Dumping Rate (DR) of extra-EU28 exports of dairy in ME to Cariforum in 2016

In 100 kg	0401	0402	0403	0404	0405	0406	190110	19019099	2105	3501	Total	Subsit	Subsidies	FOB value	DR
EU28	208818	283317	9519	7540	13680	130468	34053	172168	3958	524	864045				
ME rate	2,23	8,12	1,66	2	11,15	7,96	3	5,36	0,84	12,3	5,81				
EU28 in ME	465664,1	2300534	15801,5	15080	152532	1038525,3	102159	922820,5	3324,7	6445,2	5022886,4				
Austria	0	0	0	0	0	46558	0	0	0	0	46558	6,6	307283,1	2844923	10,8%
Belgium	24822,1	115823,7	830	1000	4426,6	22104,9	846	27453,9	135,2	0	197442,4	6,8	1342608,6	5325210	25,2%
Czech Rep.	452,7	7819,6	0	0	0	0	0	616,4	0	0	8888,7	5,2	46221	206069	22,4%
Germany	154846,7	360365,6	2969,7	44	2062,8	75508,6	0	294,8	593	6420,6	603105,8	7,9	4764536,1	13893604	34,3%
Denmark	2499,8	696419,9	0	0	4526,9	40627,8	56601	38302,6	0	0	838978,1	7,4	6208437,6	56428907	10,1%
Spain	43297,7	527,8	4631,4	0	3010,5	130965,9	318	26092,5	0	0	208843,7	5,1	1065103,1	10321799	10,3%
France	54044,1	7982	1259,9	4488	40073,1	42633,8	19764	52399,4	1781,6	0	224425,8	7,7	1728078,7	14587903	11,8%
Un.Kingdom	166656,8	131259,8	683,9	0	37006,9	302909,8	0	6759	414,1	0	645690,3	5,4	3486727,7	22330208	15,6%
Greece	0	0	0	0	0	8	0	0	0	0	8	5,2	41,4	823	5%
Croatia	0	0	0	0	0	0	0	4668,6	0	0	4668,6	4,5	21008,5	118028	17,8%
Hungary	0	0	130	0	0	0	0	5,4	0	0	135,4	3,9	527,9	44157	12%
Ireland	0	204299,2	0	0	48714,4	24771,5	10257	15115,2	0	0	303157,3	7,6	2303995,3	14248818	16,2%
Italy	71,4	284,2	31,5	0	111,5	13452,4	30	50041	0	0	64022	5,2	332914,2	3115967	10,7%
Lithuania	0	4928,8	0	0	0	0	0	6131,8	0	0	11060,7	5,2	57515,5	190161	30,2%
Netherlands	14796,1	770823,5	5395	9418	12476,9	336532,9	6435	652488,9	359,5	24,6	1808750,3	5,7	10303876	55641393	18,5%
Poland	2890,1	0	0	0	0	2380	7893	39288,8	0	0	52451,9	5,2	272750	2325287	11,7%
Portugal	289,9	0	0	0	0	0	15	3162,4	0	0	3467,3	4,5	15602,9	83864	18,6%
Sweden	84,7	0	0	0	122,7	71,6	0	0	41,2	0	320,2	7,5	2401,4	30465	7,9%
Slovenia	912,1	0	0	0	0	0	0	0	0	0	912,1	7,1	6475,7	17278	37,5%
EU28	465664,1	2300534	15801,5	15080	152532	1038525,3	102159	922820,5	3324,7	6445,2	5022886,4	5,81	32272105	201754864	16%

Table 11 shows that the main importers of dairy products were the Dominican Republic (36.9%), Haiti (17.4%), Trinidad & Tobago (14.9%) and Surinam (5.1%).

Table 11 – Cariforum MS imports of dairy products from the EU28 in 2016

In 100 kg	0401	0402	0403	0404	0405	0406	190110	19019099	2105	3501	Total
Antigua & Barbuda	8716	4987	4	4	247	2060		17	169		16204
Barbados	978	6694	705	5	646	5345		752	498		15623
Bahamas	3225	7941			3382	1863		1144	0	174	17729
Belize	2191	2053				8552	97	11175			24068
Dominica	49643	3423	1		175	1813		6224			61279
Dominican Republic	50737	142005	1027	4328	2530	69985	22736	24458	885	20	318711
Grenada	4158	13067			35	1227	2	785			19274
Guyana	3176	7354		519	49	3571	26	530	49		15274
Haiti	13392	18666	2796	43	832	2010	5532	106629	188	285	150373
Jamaica	2187	4268	1102	10	1976	3955	1283	3321	378		18480
Kitts&Nevis	1902	421			163	816					3302
St. Lucia	8748	1979	275		320	6036		224			17582
Suriname	6589	18305	1930	450	930	8744	4359	2332	368	41	44048
Trinidad& Tobago	48681	48368	1679	2181	2185	11663	18	12407	1423		128605
Vincent&Grenadines	4495	3786			210	2828		2170		4	13493
Cariforum	208818	283317	9519	7540	13680	130468	34053	172168	3958	524	864045

Table 12 converts in ME the imports of the Cariforum MS. Again the Dominican Republic is the unchallenged leader with 41.1% of all Cariforum imports in ME, followed by Haiti with 16%, Trinidad & Tobago with 13.8%, the fourth, Surinam, coming far below with 5.6%, then Dominica with 3.7% and Belize with 3%. Therefore their shares of subsidies are more or less the same: €13.264 M for the Dominican Republic, €5.164 M for Haiti, €4.454 M for Trinidad & Tobago, €1.807 M for Surinam, €1.195 for Dominica and €0.968 M for Belize.

Table 12 – Cariforum MS imports of dairy products in ME from the EU28 in 2016

In 100 kg	0401	0402	0403	0404	0405	0406	190110	1901909	2105	3501	Total
Rate of ME	2,23	8,12	1,66	2	11,15	7,96	3	5,36	0,84	12,3	
Antigua & Barbuda	19436,68	40494,44	6,64	8	2754,05	16397,6	0	91,12	141,96		79330,49
Barbados	2180,94	54355,28	1170,3	10	7202,9	42546,2	0	4030,72	418,32	0	111914,7
Bahamas	7191,75	64480,92	0	0	37709,3	14829,48	0	6131,84	0	2140,2	132483,5
Belize	4885,93	16670,36	0	0	0	68073,92	291	59898	0	0	149819,2
Dominica	110703,9	27794,76	1,66	0	1951,25	14431,48	0	33360,64	0	0	188243,7
Dominican Republic	113143,5	1153081	1704,82	8696	28209,5	557080,6	68208	131094,9	743,4	246	2062167
Grenada	9272,34	106104	0	0	390,25	9766,92	6	4207,6	0	0	129747,2
Guyana	7082,48	59714,48	0	1038	546,35	28425,16	78	2840,8	41,16	0	99766,43
Haiti	29864,16	151567,9	4641,36	86	9276,8	15999,6	16596	571531,4	157,92	3505,5	803226,7
Jamaica	4877,01	34656,16	1829,32	20	22032,4	31481,8	3849	17800,56	317,52	0	116863,8
Kitts&Nevis	4241,46	3418,52	0	0	1817,45	6495,36	0	0	0	0	15972,79
Sta Lucia	19508,04	16069,48	456,5	0	3568	48046,56	0	1200,64	0	0	88849,22
Suriname	14693,47	148636,6	3203,8	900	10369,5	69602,24	13077	12499,52	309,12	504,3	273795,6
Trinidad & Tobago	108558,6	392748,2	2787,14	4362	24362,75	92837,48	54	66501,52	1195,32	0	693407
Vincent&Grenadines	10023,85	30742,32	0	0	2341,5	22510,88	0	11631,2	0	49,2	77298,95
Cariforum	465664,1	2300534	15801,54	15080	152532	1038525	102159	922820,5	3324,72	6445,2	5022886

III – The EU dumping of pig meat to Cariforum in 2016

Table 13 shows the EU28 subsidies and dumping rate on its exports of pig meat to Cariforum MS in 2016. The 10,925 t of products are converted in 14,197 t of carcass weight equivalent (CWE) after multiplication by 1.3 (except for live pig with a conversion rate of 0.7). Given a subsidy per tonne of €217 given total subsidies to EU exports of pig products were of 3.081 M. Haiti imports received 50.8% of EU exports subsidies, the Dominican Republic 13%, the Bahamas 10.2%, Trinidad & Tobago 7%.

Table 13 – EU28 subsidies and dumping rate of its pig meat exports to Cariforum MS in 2016

In 100 kg and \$	0103	0203	020630	020649	021011	021012	021019	160100	160241	160242	160249	Total	CWE	Subsidies	FOB	DR
Cariforum	126	56928	271	28647	459	408	3029	10077	1008	259	8039	109251	141976	3080871	21745179	14.2%
Antigua & Barbuda		79					61	388	23	20	192	763	992	21524,2	299601	7.2%
Barbados		3652		140			13	113				3918	5093	110526,8	1067684	10.4%
Bahamas		9472		1020	7			616				11115	14450	313554,2	2987876	10.5%
Belize							140	87	11	59	3092	3389	4406	95603,7	1433396	6.7%
Dominica		547		539				141		9	17	1253	1629	35347,1	164315	21.5%
Dominican Republic		2458			443	348	2793	4837	857	78	2413	14227	18495	401343,7	7801147	5.1%
Grenada		11		227			6	829		18	292	1383	1798	39014,4	520802	7.5%
Guyana		60					4	25				89	116	2510,7	37078	6.8%
Haiti		32414		22300		60	1	635	47	14	17	55488	72134	1565316,5	3155250	49.6%
Jamaica		1364		569								1933	2513	54529,9	375631	14.5%
Kitts&Nevis		595		124			3	174	10	20	184	1110	1443	31313,1	243202	12.9%
Sta Lucia		133		1341				153	9	20	257	1913	2487	53965,7	307098	17.6%
Suriname	126	607		97				1498			701	3029	3887	84347,9	898993	9.4%
Trinidad & Tobago		5503	271	1825	4			70			0	7673	9975	216455,3	1785091	12.1%
Vincent&Grenadines		33		465	5		8	511	51	21	874	1968	2558	55517,3	668015	8.3%

Table 14 shows the EU MS at the origin of these exports and table 15 converts them in CWE. Poland was the main beneficiary of subsidies, with 25.8% of total, followed by Denmark (11%), Italy (9%), Ireland (8.7%), Germany (8.1%), the United Kingdom (5.4%) and France (5.1%).

Table 14 – EU28 MS exports of pig meat to Cariforum in 2016

	0103	0203	020630	02649	021011	021012	021019	160100	160241	160242	160249	Total
EU28	126	56928	271	28647	459	408	3029	10077	1008	259	8039	109251
Belgium		1665		4761						19		6515
Cyprus				223								223
Germany		4591	271	2762	6	208	317	617	77	14	24	8887
Denmark		4045						2848	82	167	4922	12064
Spain		3734		3369	421	89	2234	3766	641	73	2373	16700
France		534		4660	0	11	6	316	56	5	14	5602
Un.Kingdom		2148		3229				75	448			5900
Greece		573							3			576
Ireland		8450		1069					30			9549
Italy		6392		2496	32	40	393	349	135		5	9842
Netherlands	126	1268		867		60		1182	17		631	4151
Poland		23468		4524					235			28227
Sweden		60		447			4		17			528
Slovenia				240								240

Table 15 – EU28 MS exports of pig meat in carcass weight equivalent to Cariforum in 2016

	0103	0203	020630	02649	021011	021012	021019	160100	160241	160242	160249	Total
EU28	163,8	74006,4	352,3	37241,1	596,7	530,4	3937,7	13100,1	1310,4	336,7	10450,7	142026,3
Belgium		2164,5		6189,3				24,7			91	8469,5
Cyprus				289,9								289,9
Germany		5968,3	352,3	3590,6	7,8	270,4	412,1	802,1	100,1	18,2	31,2	11553,1
Denmark		5258,5						3702,4	106,6	217,1	6398,6	15683,2
Spain		4854,2		4379,7	547,3	115,7	2904,2	4895,8	833,3	94,9	3084,9	21710
France		694,2		6058	0	14,3	7,8	410,8	72,8	6,5	18,2	7282,6
Un.Kingdom		2792,4		4197,7			97,5	582,4				7670
Greece		744,9						3,9				748,8
Ireland		10985		1389,7				39				12413,7
Italy		8309,6		3244,8	41,6	52	510,9	453,7	175,5		6,5	12794,6
Netherlands	163,8	1648,4		1127,1		78		1536,6	22,1		820,3	5396,3
Poland		30508,4		5881,2				305,5				36695,1
Sweden		78		581,1			5,2	22,1				686,4
Slovenia				312								312

III – The EU dumping of poultry meat to Cariforum in 2016

Table 16 shows the EU28 exports of poultry meat and eggs to Cariforum in 2016 in euro and quantity (100 kg) of products (w) and in CWE (carcass weight equivalent, c). The 9,396 t of products correspond to 12,343 t of CWE, the conversion rate being of 0,79 for live poultry and 1.7 for dried eggs.

Table 16 – EU28 MS exports of poultry and eggs to Cariforum in 2016, in 100 kg.

	0105	020712	020713	020714	020725	020726	020727	020742	020743	020744	020745	020752	020755	020760	16022010	160231	160232	160239	0407	0408	Total
€	27208	309365	443643	7165634	20973	201066	216550	92931	23954	72099	66426	2014	24953	21083	83803	1022649	762791	266584	56566	1052044	11933606
k	9	3026	9858	66822	258	1830	1822	201	11	55	50	2	35	260	52	2548	2263	1498	126	3230	93956
c	0,79	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,3	1,7	
C	71	3934	12815	86869	335	2379	2369	261	14	72	65	3	46	338	68	3312	2942	1947	164	5491	123430

For an average subsidy of 120 €/t of CWE, the total subsidy was of €1.481 M.

Table 17 shows the distribution of exports per EU28 MS. The UK leads, with 45% of total, followed by Poland with 17.3% and well below France, with 7.7%, Spain with 6%, Germany with 5.7% and Italy with 5.3%. We have no time to make the table of

Table 17 – EU28 MS exports of poultry and eggs to Cariforum in 2016, in 100 kg.

	0105	020712	020713	020714	020725	020726	020727	020742	020743	020744	020745	020752	020755	020760	16022010	160231	160232	160239	0407	0408	Total
Belgium				600			210										1		28	10	849
German		47	279	4229			45	117				10	10	10		0	13			558	5308
Denmar																	1339				1339
Spain						80		15	11	42			36	250	46	2430	270	153		1355	5586
Finland				1242																	1242
France		2843		2967			0				3		4		6	83	304	19		1018	7244
UK		58	8537	32883		500	203	63								2				16	42262
Greece		50		1															77	7	135
Ireland				252																	252
Italy			250	2000	250	1250	1250									7					5007
Lithuani				2289																	2289
Netherl a	9	7	2	2204	3		100	6								18	331	87	21	266	3054
Poland		1	790	17183														1239			19213
Sweden		20		32	5		14									8	5				84
Cariforu	9	3026	9858	66822	258	1830	1822	201	11	55	50	260	52	2548	2263	1498	126		3230		93864

Table 18 shows the distribution of EU poultry exports among the Cariforum MS. Haiti leads with 40.4% of EU exports, followed by St Vincent & Grenadines (15.4%), Trinidad & Tobago (11.1) and Sta Lucia (11.1%) and Dominican Republic (6%). Even if we don't have time to convert the exports in CWE, as most products have the same rate of CWE (1.3), this distribution is almost the same for subsidies.

Table 17 – EU28 MS exports of poultry and eggs to Cariforum in 2016, in 100 kg.

	02071 2	02071 3	02071 4	02072 5	02072 6	02072 7	02074 2	02074 3	02074 4	02074 5	02075 2	02076 0	02076 0	1602201 0	16023 1	16023 2	16023 9	040 7	040 8	Total
Antq			21			6	13		1							210				251
Barb	52		4052		500		49									7	5		16	4681
Baha	50	250	1422											1		3	0	77		1803
Belize																65				65
Domini			2018													132				2150
DomR	47	9	90	3	80	45	132	11	54	50	2	35	10	49	2451	432	172		203	5708
Grend			66													421				487
Guya	290		1564	5		14										8	100			1981
Haiti	8	1802	31518	250	1250	1559	6		0				250	2		8	1239	21		3791
Jamai			1																7	8
KittsN			48				1													84
SILuc	6		10104			197										76				1038
Surin	2573		326			1										13	490	87	28	3527
Trini		7797	1388													69	38		117	1046
Vince			14204													248				1445
Carifr	3026	9858	66822	258	1830	1822	201	11	55	50	2	35	260	52	2548	2263	1498	126	323	9995
																			0	6

Conclusion

As the EU exports of bovine meat to Cariforum is very low, it is useless to present them. Let us totalize its total subsidies to exports of cereals, dairy, pig meat and poultry meat. They have accounted for €46.357 M in 2016. This is close to the €49.429 M of the EU annual commitment of development aid to Cariforum, given the envelope of €346 M for the 2014-20 period⁸. As several Cariforum MS have begun to liberalize their imports from the EU – and they should all liberalize much more in the future –, adding the losses of tariffs and value added tax on their imports from the EU, plus the other constraints on policy space imposed by the EPA, should lead them to reconsider their participation to the EPA. The more so if they take into account the increasing loss of competitiveness they will face, particularly on sugar and bananas after the EU FTAs concluded with the 6 central American countries and the 3 Andean countries, not to speak of the likely FTA with Mercosur and the new FTA with Mexico which demand significant tariff rate quotas for these products.

⁸ https://ec.europa.eu/europeaid/sites/devco/files/rip-edf11-caraibes-2014-2020_en.pdf