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Ten years of anti-dumping in the EU: Economic and political targeting

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Ten years of anti-dumping in the EU: economic and political targeting.

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ABSTRACT

ANTI-DUMPING IS AT the heart of EU trade policy. Its use is justified on the grounds of eliminating injurious dumping by foreign firms and re-establishing conditions of 'fair' trade. Use of anti-dumping has been rising globally, generating concerns about the potential for protectionist abuse of this trade defence instrument. Most economists are of the opinion that anti-dumping has little to do with 'unfair' trade. In general, suspicions are high that domestic industries are turning to anti-dumping as a form of protectionism, and that the EU's current anti-dumping laws support their efforts. This paper takes an in-depth look at the past ten years of anti-dumping usage in the EU. The analysis draws on information from the 332 anti-dumping cases initiated between 1998 and 31 December 2008.

Five empirical tendencies have been identified:

1. The main targets of investigations and measures are exporters in emerging markets, particularly in Asia – a growing source of global competition;
2. Targeted products are concentrated in sectors where European comparative advantage is declining, i.e. raw materials, industrial input goods and textiles;
3. Dumping margins reflect this pattern, being particularly high in the chemicals and steel sectors;
4. Duty levels are significantly higher than bound tariffs, particularly in the higher-end technology sector.
5. Once an anti-dumping investigation has been initiated, definitive measures are the most likely outcome.



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INTRODUCTION¹

ANTI-DUMPING MEASURES ARE open to protectionist abuse – a fact widely recognised by trade economists. The European Commission (EC) has initiated reviews and reforms internally, and has called for greater transparency and scrutiny. But accusations about unfairness continue: in the last ten years, the EU has been the defendant in 43 disputes over anti-dumping measures in EU or WTO courts.

Meanwhile, the practice proliferates. Following a small decline in the early 2000s, the worldwide total of anti-dumping actions has been on the rise since 2004. The World Trade Organisation (WTO) reports a 39% increase in initiations over the period 1 January to 30 June 2008, compared to the same period in 2007. The EU has followed this pattern. Anti-dumping cases initiated during the twelve months of 2008 show a rise on 2007 figures, and there are more impending cases in the pipeline for 2009.

Anti-dumping is a highly-charged area of trade policy and tends to generate strong emotions and defensive positioning. As such, it can be difficult to obtain a clear understanding of how this favourite of trade defence instruments (TDIs) is being used and its significance for Europe's trade with the rest of the world. By taking a step back from individual controversies, it is the aim of this paper to 'distinguish the wood from the trees' in providing a clear picture of how anti-dumping has been used by the EU. It will be the beginning of an investigative process, to identify the shape of EU anti-dumping usage in the past 10 years, using data gathered from all 332 anti-dumping cases initiated between 1998 and the end of 2008.

Section one begins with a brief overview of TDIs and anti-dumping globally and section two presents the main findings of the European data analysis. Trends in anti-dumping usage are presented, including target countries, sectors and developments over time. Section three takes a more detailed look at how recourse to anti-dumping actions can form part of industry strategies to protect themselves against global competitors. Emerging from this analysis, trends over the past decade indicate the use of anti-dumping as a protectionist measure against rising global competition. Concerns over falling EU competitiveness have been a particular driving factor. Five main empirical tendencies are identified from the past ten years:

- Asia and emerging markets are the favoured targets of anti-dumping duties, China in particular.
- Targeted products are concentrated in those sectors where European production is declining, i.e. raw materials, input goods and textiles.
- Dumping margins reflect these patterns, being particularly high in the chemicals and steel sectors.
- Duty levels are considerably higher than bound tariffs for all sectors and products, but especially so for more advanced technological products.
- A definitive duty is the most likely outcome once an anti-dumping investigation has been initiated.

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Patterns of anti-dumping use over the past decade suggest that, as globalisation has brought surges in competition for different products, at different times, sector interests have successfully galvanised European political support for anti-dumping protectionism.

SECTION ONE: ANTI-DUMPING ON THE GLOBAL STAGE

A HISTORY OF modern anti-dumping law starts with the 1947 GATT agreement, resulting in the 1994 agreement establishing the WTO. The agreement defines dumping as the practice whereby the “products of one country are introduced into the commerce of another country at less than the normal value of the products”. Exceptions to the international rules of bound tariffs and the MFN principle are permitted in the form of anti-dumping duties if such action is proved to cause “material injury” to a domestic industry.

Anti-dumping is just one form of TDI now permitted under WTO rules and employed by states to provide remedies against unfair trade or sudden surges in imports, which can harm domestic industries. Countervailing (anti-subsidy) measures and safeguards against import surges are the other main TDIs. These exceptions to the fundamental principles of the WTO are based on the rationale of providing a ‘free and fair trading environment’ in global markets.

When it comes to unfair trade, Article VI (5) of GATT states that no one product from any one country can be subject to both anti-dumping and countervailing duties. Complainants therefore need to make a choice about which course to follow. Of the two, anti-dumping has been by far the most popular, constituting around 90% of protection measures consistently over the past half century. Between 1995 and 2005, 3164 contingent protection measures were initiated worldwide - 2840 of them were anti-dumping measures; while just 182 were countervailing duties and 142 were safeguard measures (Aggarwal 2007, p. 38).

In terms of global usage, the introduction of a requirement for countries to report anti-dumping actions in the 1980s revealed the US and EU as heaviest users throughout the 1980s and early 1990s, followed by Australia. They continue to be heavy users. But from the end of the Uruguay Round in the mid-1990s, other users began to emerge, and developing and emerging economies now constitute the majority of users at the top of the anti-dumping tables – see Box 1. Record levels were reached in 2001, with the launch of 348 investigations involving 24 countries (WTO 2008). The rate of initiations then slowed, but is now rising again. In the first half of 2008, sixteen WTO members reported a total of 85 new investigations, compared with just 61 in the corresponding 2007 period.² China was the most frequent subject of new investigations, and dumped goods from the base metals sector were the most frequently targeted.

BOX1. GLOBAL ANTI-DUMPING FIGURES, 1 JAN – 30 JUNE 2008

Selected figures from the WTO Secretariat report:

- 85 new investigations launched by 16 members
- 54 new final AD measures applied by 12 members
- 54 of the new investigations opened and 41 of the final measures applied were by developing country members
- Most frequent initiators of investigations – Turkey (13), US (12), India (11) Argentina and EC (10), Brazil (7).
- Most frequent users of final measures – India (16), EC (8), Indonesia (5).
- Most frequent targets of investigations – China (37), Thailand (7), EC and Indonesia (5).
- Most frequent target products – base metals sector (21), textiles sector (20), chemicals sector (10).

So do the rules really reflect the reality of how anti-dumping is used? And why is anti-dumping so intensively used? Its rise coincides with modern globalisation and acceleration of market integration witnessed since the mid-twentieth century. A first explanation, therefore, is that globalisation has brought with it growth in world trade and the increased market activity of firms keen to capture ever larger shares. The rise in anti-dumping actions therefore could merely reflect a greater need to rectify these aggressive tactics in order to preserve a sound economic basis for the global economy.

However, most economists are of the view that anti-dumping actually has little to do with sound economics. Instead, greater global competition, coupled with the virtual elimination of tariffs in certain sectors, has resulted in import-competing producers turning to anti-dumping as a protectionist tactic against what is fair and legitimate trade. Their choice of anti-dumping as opposed to countervailing measures could be explained by the greater flexibility of the rules at international level. Anti-dumping law in all jurisdictions comes under Article VI of the GATT, but how states investigate alleged dumping and impose anti-dumping duties is open to wide discretion. In short, commercial and political interests have found it much easier to obtain favourable results from anti-dumping action, due to each individual state's ability to manage the process. Anti-dumping has attractive features in this sense – particular exporters can be singled out, the investigation process alone is often enough to curb imports because of the administrative costs placed on traders and the rhetoric of 'unfair' foreign trading practices provokes political support for protection. The last of these reasons has led some to conclude that, in the words of Douglas Nelson, "a policy this bad can't be the product of rational policy making, it must be the product of a process distorted by politics" (Nelson 2004, p. 2).

These two explanations of the rise of anti-dumping – protection against unfair trade or protectionism against fair trade - form the basis of all disputes over this controversial trade policy instrument. Anti-dumping provisions are largely justified on the grounds of ensuring that global markets are not distorted by predatory and monopolistic interests, i.e. ensuring 'fair' trade. But they can act in the exact opposite direction if they are captured and misused as protectionist instruments. So what does the data from the past ten years of EU anti-dumping actions tell us, if anything, about how they are used?

SECTION TWO. PATTERNS OF ANTI-DUMPING IN THE EU

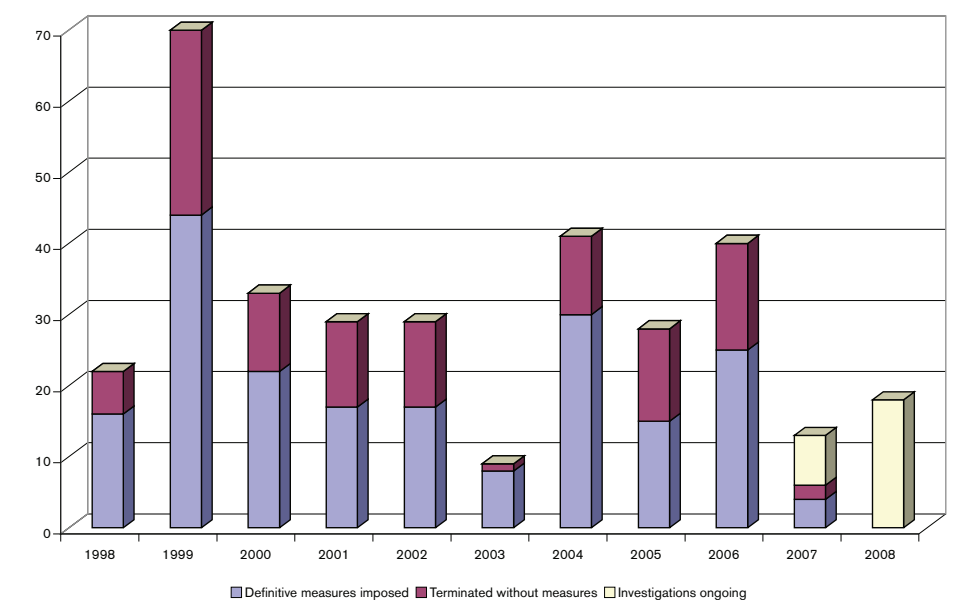
THE OVERALL TREND in the past decade of EU anti-dumping use broadly follows the global trend (see table 1 and figure 1). The number of initiations peaked in the late 1990s, and show recent signs of revival, with the exception of 2007. On 31 December 2008, there were a total of 128 anti-dumping measures in force and 24 investigations ongoing (Commission of the European Communities 2008).

At the end of 2008, the EU had initiated 332 anti-dumping investigations in the preceding ten years. Of those investigations concluded to date, 198 – 64.5% - have resulted in definitive measures being imposed (see table 1 and figure 1).

TABLE 1. INVESTIGATIONS INITIATED AND RESULTS, RANKED BY YEAR 1998 - 2008

	NO. INITIATED	NO. RESULTING IN DEFINITIVE MEASURES	NO. TERMINATED WITHOUT DEFINITIVE MEASURES	UNDER INVESTIGATION
1998	22	16	6	0
1999	70	44	26	0
2000	33	22	11	0
2001	29	17	12	0
2002	29	17	12	0
2003	9	8	1	0
2004	41	30	11	0
2005	27	15	13	0
2006	40	25	15	0
2007	14	4	2	7
2008	18	0	0	18
TOTAL	332	198	109	25

FIGURE 1. INVESTIGATIONS RESULTING IN DEFINITIVE MEASURES, BY YEAR



Source: author's calculations based on <http://ec.europa.eu/trade/issues/respectrules/anti_dumping/stats.htm>

Three methodological issues need to be highlighted here. Cases are counted by product *and* country, as there is often more than one target country in a single case. Both initiations and final duties are considered, as investigations by themselves can stimulate changes in import and production levels, as well as prices. Finally, cases are ranked by their year of initiation, not by the number of different decisions in any given year³. This is done so that cases can be tracked from start to finish, avoiding the confusion that can surround anti-dumping statistics.

Within this overall picture, four tendencies can be seen.

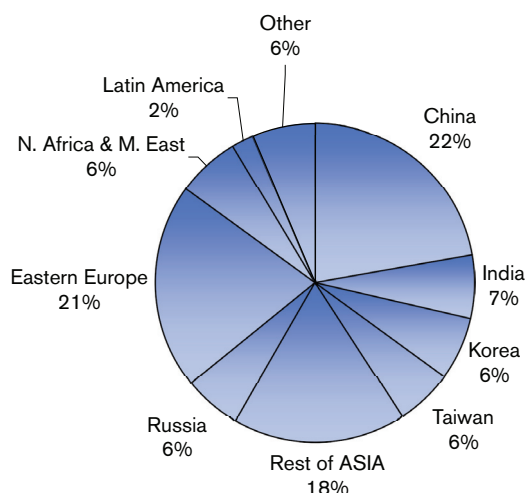
a) Target countries

TEN YEARS OF anti-dumping investigations have been dominated by exports from developing and emerging economies. Figure 2 shows a breakdown by region, extracting some of the key target countries that stand out over the past ten years⁴. 59% of cases have involved Asian exports, 22%

from China alone. This figure rises to 32% from 2004 onwards. Eastern Europe has also commonly been the subject of investigation – 27% of cases, including Russia. There are corresponding trends from general trade patterns. For example, Asian countries have become particularly prolific exporters, representing competition to European industries.

Paranoia over China's export success in particular has been the subject of much trade policy debate at the European level. Based on these figures, the paranoia seems to have affected anti-dumping. China's case is the most recent phenomenon. Since the beginning of 2007, 42% of all anti-dumping cases initiated by the EC have targeted Chinese producers.

FIGURE 2. TARGET COUNTRIES/REGIONS OF ANTI-DUMPING INVESTIGATIONS, 1998-2008

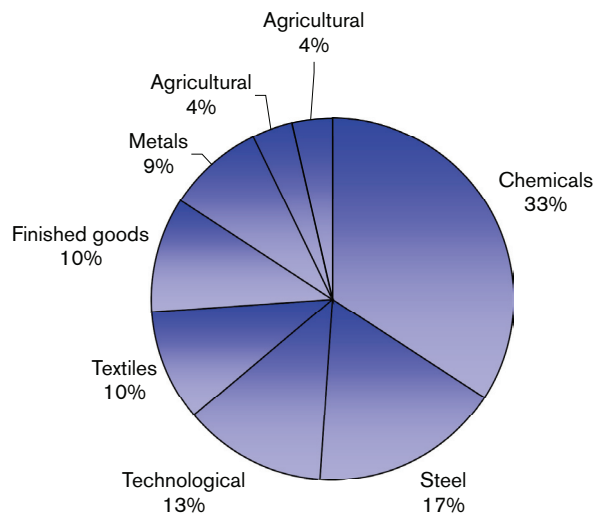


Source: author's calculations, based on http://ec.europa.eu/trade/issues/respectrules/anti_dumping/stats.htm

b) Target sectors

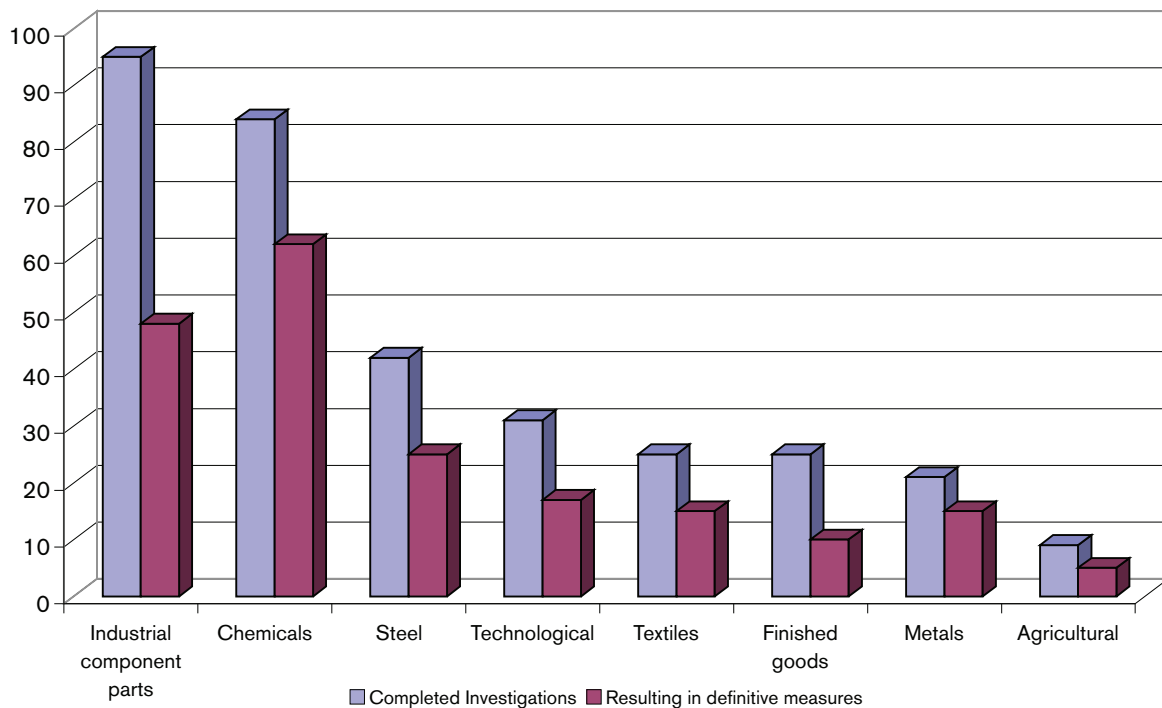
OVERALL, THE PAST ten years have seen most extensive anti-dumping action in the chemicals and metals sectors and industrial component parts comprised of semi-transformed raw materials (see figure 3). The steel industry has been disaggregated from other metals for the benefit of this analysis, due to the intensity with which anti-dumping is used – 13% of all cases since 1998 have been initiated by the steel industry alone. However, it should also be noted that many component parts are also made from steel, for example, pipes and tube fittings and hot-rolled coils. Investigations concerning these products will also therefore involve the steel industry.

With the inclusion of textiles, this means that 81% of anti-dumping cases since 1998 have involved raw materials or low-skill manufacturing products – two sectors in which European production has come up against increasingly vigorous competition as developing and emerging economies, particularly in Asia, have entered the world market. European production in these sectors has historically been strong on international markets, and remains high in some sub-sectors. But the trend is decline, whether due to an internal shift in Europe's export profile towards service industries or the comparative cost and skill advantages of other countries entering the market. Lower input costs in these countries place them at a distinct advantage vis-à-vis Europe with regard to production levels and pricing, thus inviting accusations of price undercutting in anti-dumping actions. Whatever the reason, the trends in sector targeting over the past ten years are a clear indicator that a high proportion of anti-dumping investigations have been concentrated in sectors where production has shifted to other countries and the standard European pattern is decline.

FIGURE 3. TARGET SECTORS IN ANTI-DUMPING INVESTIGATIONS, 1998-2008

Source: author's calculations based on <http://ec.europa.eu/trade/issues/respectrules/anti_dumping/stats.htm>

What is also interesting is that it has been in these sectors in which definitive duties have been most likely to be imposed upon completion of an investigation (see figure 4). Of the 307 completed investigations, metals, chemicals and steel have all seen more than 70% of investigations resulting in definitive measures.

FIGURE 4: INVESTIGATIONS RESULTING IN DEFINITIVE MEASURES, BY SECTOR. 1998 - 2008

Source: author's calculations based on http://ec.europa.eu/trade/issues/respectrules/anti_dumping/stats.htm

c) Dumping margins

DUMPING MARGINS ARE expressed as a percentage of the import price at the Community frontier, duty unpaid, for all exporters from the country concerned. These percentages enter calculations of final duties. The average level of anti-dumping margins calculated during investigations has remained fairly constant over the course of the decade (see table 2).⁵ Averages can, of course, hide a lot and over the ten-year period margins have ranged as high as 144% for ring binder mechanisms originating in Indonesia in 2002 (*Certain ring binder mechanisms*, Indonesia, 2002. OJ L150. 4 June 2002. Para 46).

TABLE 2. AVERAGE DUMPING MARGINS BY YEAR, 1998 – 2008.

YEAR	AVERAGE DUMPING MARGIN
2008	27.1%
2007	32.8%
2006	43.4%
2005	43.4%
2004	38.1%
2003	31.2%
2002	48.3%
2001	48.7%
2000	37.1%
1999	42.2%
1998	37.6%

Source: author's calculations based on Official Journal records

However, when the data is disaggregated by sector for all ten years, a similar trend emerges to that outlined in the previous section (see table 3). Dumping margins are consistently calculated at high levels, with an average of 62.1%. Again this figure hides some excessively high margins - 132% on steel ropes and cables from South Africa in 1999 (*Steel ropes and cables*, South Africa, 1999. OJ L217, 12 August 1999. Para. 39), for example.

TABLE 3. AVERAGE DUMPING MARGINS BY SECTOR, 1998 - 2008

SECTOR	AVERAGE DUMPING MARGIN
Steel	62.1
Component parts	51.4
Chemicals	41.6
Finished Household Products	37.3
Metals	32.2
Clothing and textiles	32.1
Agricultural	26.3
Electrical products	13.8

Source: author's calculations based on Official Journal records

Once a dumping margin has been calculated, a decision is taken on the level of duty required to offset the dumping. In the EU, this duty is collected at a rate corresponding to the average rate of dumping found during the investigation period (Bentley and Silberston 2007). Given that the purpose of anti-dumping is only to correct the injury caused by dumping practices, duty levels are usually lower than the margin of dumping. This has been the case in the EU, although in two sectors – electrical products and agriculture – duty levels have been almost equal to dumping margins (see table 4). Agriculture has traditionally been a highly-protected sector. Average tariffs are currently at 15.1%, the highest in the EU and so the high anti-dumping duties found here are perhaps to be expected. The opposite is true of electrical goods. The very low tariffs now facing imports – at an average of 2.4% - are likely to encourage domestic producers to seek alternative means of protection from rising global competition. Anti-dumping provides one such avenue.

In fact, this is true of most sectors within Europe. What is striking about the EC's anti-dumping duties is that they are so much higher than the average bound tariffs applied by the EU in all sectors (see table 4). Even agricultural products have seen an average anti-dumping duty of almost double the tariff level in the past ten years. Anti-dumping duties thus offer significant import protection to European producers, who are now operating with much reduced tariff protection as compared to previous decades. It is an attractive instrument from that point of view.

TABLE 4. AVERAGE ANTI-DUMPING DUTY LEVELS COMPARED TO AVERAGE BOUND TARIFF LEVELS FOR EU PRODUCTS

SECTOR	AVERAGE DUTY LEVEL (%)	AVERAGE BOUND TARIFF LEVEL (%)
Finished Household Products	34.6	2.5
Component parts	30.6	4.1
Steel	30.0	2.0
Metals	26.3	2.0
Chemicals	24.9	4.6
Agricultural	23.9	15.1
Clothing and textiles	19.0	11.5
Electrical products	13.2	2.4

Source: Average duty levels from author's calculations based on Official Journal records; Tariff levels from WTO (2008)

d) Time⁶

THE LAST AND most important factor to enter into the equation is time. Anti-dumping activities are often country, product *and* time specific. As attention to various sources of external competition has shifted over the course of the decade, so too have the focal points of anti-dumping.

Considering target sectors first, the composition of anti-dumping investigations by sector has changed with time (see table 5). At the start of the period, investigations were entirely concentrated in steel, industrial component parts and textiles – reflecting the pressure felt within Europe (and much of the Western world) from the rise of new major exporters of raw materials and input goods, which began in earnest in the 1980s. From the late 1990s, we begin to see other products entering the frame, finished household and electrical goods - electronic weight scales from Taiwan and Korea in 1999, refrigerators from Korea in 2005, and ironing boards from China and Ukraine in 2006 - to name a few. These countries are keen to move up the value chain of production into higher-value exports. This means direct competition for higher-value European products *in addition* to those already threatened by exports of raw materials, chemicals and input goods from these emerging markets. Although the data has not been used in this analysis, a similar trend was

seen during the 1980s, when Japan was a major target of European anti-dumping actions. Many sophisticated electronic goods were targeted, photocopiers being the best known example. The newly-emerging Asian economies represent the latest round of competition and threat to European production, and anti-dumping attention has shifted correspondingly.

Different sectors have different reasons to pursue anti-dumping as a means of protectionism. The steel industry, for example, has been one of the longest and most prolific users of anti-dumping as a means of preventing foreign competitors gaining a foothold in the European market. Producers of input goods and component parts have attempted to stem foreign imports and cheaper competition. While the electronics industry and producers of finished products within Europe have used the protection afforded by anti-dumping duties to restructure, relocating much of their production overseas, in recognition that they cannot compete with lower production cost sites.

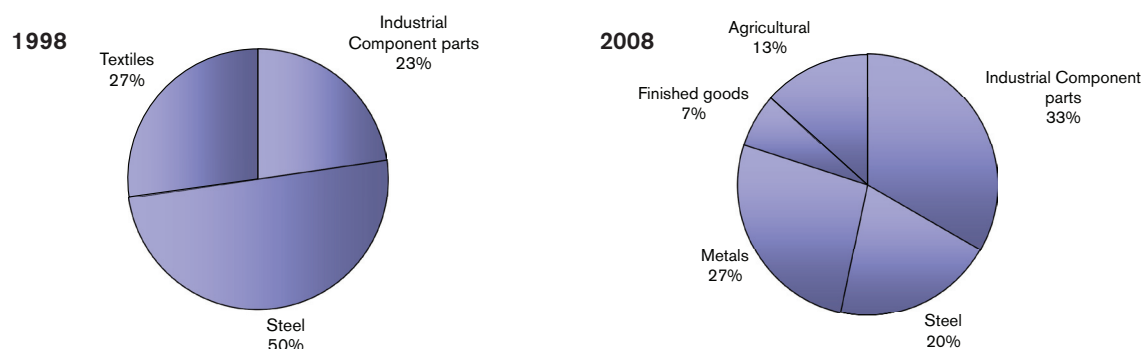
TABLE 5. COMPOSITION OF INVESTIGATIONS BY SECTOR, BY YEAR, 1998 - 2008

	CHEMICALS	STEEL	OTHER METALS	INDUSTRIAL COMPONENT PARTS	TEXTILES	TECH	FINISHED GOODS	AGRICULTURAL	TOTAL
1998		11		5	6				22
1999	18	6		21	5	10	10		70
2000	19	6	2	3		2			33
2001	4			21	3	2			29
2002	10	4	2	2		2	5	4	29
2003	3	1		2	2	1			9
2004	6	11	3	12	4	3	1	1	41
2005	3			7	4	8	4	1	27
2006	18		9	4		3	4	2	40
2007	2		1	9	1			1	14
2008	1	3	4	7			2	1	18
Total	84	42	21	93	25	31	26	10	332

Source: author's calculations based on <http://ec.europa.eu/trade/issues/respectrules/anti_dumping/stats.htm>

A straightforward comparison of 1998 with 2008 shows a clear diversification of sectors involved in anti-dumping actions (see figure 5). Although still dominated by the 'traditional' sectors - 80% of all anti-dumping complaints so far in 2008 have come from the chemicals, metals and industrial sectors – other products are entering the frame. Fears of high-tech competition from Asia in particular make it reasonable to suggest the diversification trend will continue into the future, as the pressures of globalisation are felt more widely.

FIGURE 5. COMPOSITION OF ANTI-DUMPING INVESTIGATIONS BY SECTOR, 1998 AND 2008



Source: author's calculations based on <http://ec.europa.eu/trade/issues/respectrules/anti_dumping/stats.htm>

We also see concentrations of cases in certain sectors at certain times (see table 4), suggesting that better organised sectoral interests have co-ordinated action. For example, the steel industry was most active in initiating anti-dumping complaints in 1998 and 2004. Steel imports from Eastern Europe and China, in particular, surged in the late 1990s and 2004 respectively⁷, and have continued to rise. Import surges, though, are not the whole story. There are also peaks in cases featuring ‘industrial component parts’, with 21 cases being initiated in both 1999 and 2001. Products such as tube and pipe fittings and hot-rolled coils, made from either iron or steel, form over half of these cases. So it would appear that the steel industry was more continually active over the turn of the century than a quick glance at the figures suggests, but have been working in conjunction with manufacturing and assembly industries in initiating anti-dumping complaints. These kinds of coalitions can be seen in the *Official Journal* anti-dumping reports as regular complainants. The full list unfortunately cannot be included here, due to space constraints. Peaks can also be seen in the chemicals sector in 1999, 2000 and 2006. Yet, imports of chemicals and related goods have been steadily increasing year on year over the past decade⁸. The pattern of anti-dumping cases in this instance is more indicative of co-ordinated and concentrated action, rather than immediate reactions to import penetration.

Table 6 brings countries back in to the analysis. Anti-dumping actions against Indian products are concentrated around the late 1990s/turn of the century. Eastern European countries became the subject of interest shortly after, with countries such as Lithuania, Poland and Ukraine on the receiving end of measures in the early 2000s. Moving to the second half of the decade, Asian countries have become the more popular targets, China in particular from 2004 onwards.

TABLE 6. COMPOSITION OF INVESTIGATIONS BY COUNTRY, BY YEAR, 1998 - 2008

	CHINA	INDIA	KOREA	TAIWAN	REST OF ASIA	RUSSIA	E. EUROPE	M. EAST & N. AFRICA	L. AMERICA	OTHER	TOTAL
1998	1	3	4	1			9	1	1	2	22
1999	12	5	7	8	16	1	13	3	1	4	70
2000	7	4	2		3	3	12	1		1	33
2001	2	4	1	1	2	2	10	4	1	2	29
2002	4	1		1	6	5	5	3	1	3	29
2003	3	1			1		4				9
2004	10	1	3	3	12	3	2	4	1	2	41
2005	8	1	1	1	8	1	3	2	1	1	27
2006	12	1	2	3	7	3	6	3		3	40
2007	8	1			2	1	1			1	14
2008	6		1	1	3		4		1	2	18
TOTAL	73	22	21	19	60	19	69	21	7	21	332

Source: author's calculations based on <http://ec.europa.eu/trade/issues/respectrules/anti_dumping/stats.htm>

Countries and sectors are obviously not mutually exclusive in this trend. A simple side-by-side comparison of tables 4 and 5 tells much of the story. For example, the bulk of cases targeting Eastern Europe in 1998 and 1999 and China in 2004 involved steel and related products. For a more specific example, all eight of the anti-dumping duties on products originating in Vietnam, an emerging Asian economy, were introduced between 2002 and 2005. Half involved the ‘traditional’ raw materials and chemicals sectors. But the other half were on finished and technological goods (see annex 1), representing the kind of diversification seen overall. To take a more high profile example, of the 72 investigations into products originating in China, over half have been initiated since 2004. Again, there is a greater diversity of sectors represented, but nevertheless still a concentration in chemicals and industrial component parts.

SECTION THREE: WHO MAKES THE COMPLAINTS?

THE MAIN FACTOR underlying these trends – i.e. rising global competition for European producers – is further supported when the initial sources of anti-dumping complaints are identified. It is usually the initial complaint from industry sources that prompts the EC to open an anti-dumping investigation⁹. With this in mind, all 198 cases resulting in definitive measures since 1998 have been analysed. Figure 6 provides a picture of the activity of industries within individual countries. From this initial overview, four clear countries stand out as having the most active industry users of anti-dumping – Germany, France, Italy and Spain. The percentages have been fairly constant throughout the period and the figures are striking. German industries have initiated and backed definitive anti-dumping measures in almost half of all cases. Companies in the UK, Netherlands and Austria have been moderately active users. These seven countries are to a large extent representative of where much of Europe's industrial production is located. However, the data can be disaggregated further in several ways.

FIGURE 6. COMPLAINANT INDUSTRY HOME COUNTRIES

The following are the percentages of all 198 definitive measures (1998-2008) which have resulted from complaints backed by industries from that country.

Germany	47.5%
France	42.9%
Italy	41.9%
Spain	35.4%
UK	21.7%
Netherlands	16.2%
Austria	10.6%
Belgium	5.6%
Denmark	5.1%
Poland	4.5%
Luxembourg	4.0%
Ireland	3.5%
Slovenia	3.5%
Sweden	3.5%
Slovakia	3.0%
Greece	2.5%
Portugal	2.5%
Finland	1.5%
Czech Rep	0.5%
Hungary	0.5%

Source: author's calculations based on Official Journal records

Firstly, what can be seen from the composition of complaints is that 90% have been brought to the Commission on behalf of companies by an industry representative body. For example, the steel industry is particularly well-represented with the 'Defence Committee of the Seamless Steel Tube Industry of the European Union', the 'Defence Committee of the Steel Butt-Welding Fittings Industry of the European Union', the 'Defence Committee of the Welded Steel Tube Industry of the European Union' and the 'European Confederation of Iron and Steel Industries' (Eurofer). Between them, they have initiated 23 anti-dumping cases that have successfully resulted in definitive duties being imposed on steel imports into the EU. Within the chemicals sector, the 'European

Fertiliser Manufacturers Association' (EFMA) has instigated 15 definitive anti-dumping duties on imports of urea and ammonium nitrate on behalf of its members. Table 7 gives further details of the most active groups in the past ten years. They are heavily concentrated in the chemicals, metal and steel processing sectors.

TABLE 7. DEFINITIVE MEASURES IMPOSED AS A RESULT OF COMPLAINANT INDUSTRY GROUPS

INDUSTRY REPRESENTATIVE BODY	NUMBER OF DEFINITIVE MEASURES, 1998 - 2008
Steel Industry Defence Committees and Eurofer	23
European Fertiliser Manufacturers Association (EFMA)	15
European Chemical Industry Council (CEFIC)	12
Liaison Committee of European Union Wire Rope Industries (EWRIS)	12
Euroalliages (Liaison Committee of the Ferro-Alloy Industry)	10
Association of Plastic Manufacturers in Europe	8
Ring Alliance Ringbuchtechnik GmbH	6
European Association of Metals	6

Source: author's calculations, based on Official Journal records

These committees and confederations are only acting however *on behalf* of their members. The advantages to these members of coordinating action through a central body include the ability to identify pan-industry concerns and interests, and bulk-up the percentage of Community production represented in anti-dumping investigations. Such representations can be used by a few members to push their own interests. Individual companies are not explicitly named in all cases, but where they are, the same countries' industries can be found behind many of the group complaints. For example, Eurofer members that have been more active include – Aceralía Corporación, Spain; Dillinger Hüttenwerke AG, Germany; and Tramel, Italy. Of the members of the EFMA, the following companies have been involved in multiple complaints – Hydro Agri, Italy, France, and Germany; Grande Paroisse, France; and Fertiberia, Spain. Another example is the 2006 imposition of duties on imports of saddles from China following a complaint from the European Saddle Manufacturers Association (ESMA), claiming to be acting on behalf of 99% of Community production. But the Chairman of the ESMA, Pietro Nigrelli, is also the general secretary of the bicycle division of SNCMA, the Italian industry association.

The other 10% of complaints are represented in table 8. These are all companies that have brought anti-dumping complaints either alone or in small groups, i.e. without the aid of a representative committee or confederation. Again, 12 of these are based in either Germany, France, Spain or Italy. The three Italian PET film producers succeeded in the imposition of four duties against imports from India, Korea, Brazil and Israel. Philips Europe, with production sites in several countries, has been responsible for three complaints resulting in definitive duties against imports from India, Korea and Lithuania.

TABLE 8. COMPLAINANT INDUSTRIES ACTING ALONE OR IN SMALL GROUPS, 1998 - 2008

COMPLAINANT	PRODUCT
Ciba Specialty Chemicals plc, UK	Black coloformers
Degussa Knottingly Ltd., UK	Para-cresol
Industrial Química del Nalón, SA, Spain	Coke (over 80mm)
Industrias Doy Manuel Mórte, Spain	Coke (over 80mm)
Niko, Slovenia	Lever arch mechanisms
Italiana Coke SpA, Savona, Italy	Coke (over 80mm)
Nuroll SpA, Italy	Polyethylene terephthalate film (PET film)_
DuPont Teijin, Italy	Polyethylene terephthalate film (PET film)_
Mitsubishi Polyester Film GmbH, Germany	Polyethylene terephthalate film (PET film)_
Philips Europe	Cathode-ray colour television picture tubes
Productos aditivos SA, Spain	Sodium cyclamate
Productos de Fundación, SA, Spain	Sodium cyclamate
Solvay Barium Strontium GmbH, Germany	Barium carbonate
Sorochimie Chimie Fine, France	Sulphanilic acid
SRAM Deutschland GmbH, Germany	Gear hubs (internal) for bicycles
Tosoh Hellas AIC, Greece	Manganese dioxides
Transfurans Chemicals BVBA, Belgium	Furfuryl alcohol
Whirlpool, Europe, Italy	Refrigerators (side by side)

Source: Official Journal records

So, there does appear to be a concentration of anti-dumping activity in a small number of countries in Europe. It is no coincidence that these are the countries with the highest concentrations of industries most likely to feel the pressure of expanding global markets and competition. While large chemicals, metal and steel processing industries in Europe feel threatened by overseas competitors, they in particular also have the strength and means of organisation with which to galvanise anti-dumping measures against them. And they have been active in doing so. The number of companies venturing forward to file complaints alone has been relatively limited in comparison to these powerful representative bodies, although there have been significant successes in the past ten years from those that have tried. All of which suggests that anti-dumping has been a favoured protectionist tool for European industries.

What is more, whether the complainant has acted alone or through an industry representative, definitive duties have been imposed in 15 cases as a result of a complaint from the sole Community producer. This has implications for competition law and could even facilitate the kind of market domination that anti-dumping legislation is purported to prevent, as the following section details.

SECTION FOUR: THE PARADOX OF ANTI-DUMPING

THE CONSTANT EVOLUTION and expansion of global markets creates pressures for different industry producers at different times. European industries concerned about greater competition from abroad often possess influential lobbying groups. Sectors like steel and chemicals have initiated and been successful in anti-dumping complaints more frequently than others. A number of explanations have been explored. These sectors are larger, better organised and employ large

workforces, representing a large share of the voting population. Economic interests can thus very quickly become political interests. And ultimately, changing political fears over competitiveness have a bearing on who is successful in receiving trade protection in the form of anti-dumping measures and at what level. Previous studies have also concluded that the adoption and use of anti-dumping law is often the result of rent-seeking behaviour by special interest groups (Sadni-Jallab 2005, Vandenbussche 2007).

One danger is that dominant firms and cartels will use anti-dumping legislation to further increase their own market power. A number of studies have discussed and analysed the link between anti-dumping and competition law (Messerlin 1990, Baylis 2008). Some recent cases illustrate the point. For example, definitive duties were imposed on imports of polysulphide polymers from the US, following a complaint from the sole EU producer in Germany. The US company ceased trading in the EU as a result, leaving a monopoly in the EU market. Interestingly, this was predicted during the Community interest investigation, but obviously not heeded (or heeded and a decision to award a monopoly made) in the decision to impose duties (*Polysulphide polymers*, United States. OJ L255, 17 September 1998, p. 1). What is striking about this case is that the EC's defence of anti-dumping law rests strongly on the theory that anti-dumping measures can create a competitive trading environment that cannot be achieved with competition law alone. 'Free and fair' trade is the alleged goal of allowing temporary duties above and beyond bound tariffs, in order to prevent monopolisation of global markets. The inherent contradiction of this case (and others not detailed here) is that the imposition of anti-dumping measures themselves created a monopoly position. Had such situations been exposed to competition authorities for consideration, they are unlikely to have been passed.

A more recent case further highlights this contradiction. Imports of certain candles, tapers and the like originating in China are currently under investigation and subject to provisional duties following a complaint lodged on 3 January 2008 by producers representing 60% of Community production (*Certain candles, tapers and the like*, China. OJ L306, 14 November 2008, p. 22). There are two aspects of this case which warrant closer examination when considering competition. The first relates to the definition of the product concerned, which is generally very broad and covers multiple types of products. Yet, memory lights and outdoor candles, for which European producers dominate markets, have been excluded from the investigation. In response to complaints about this exclusion, the Commission replied that the fact that the Community industry may be dominant in this segment is "irrelevant" (para. 22). Secondly, and arguably more crucially, a European paraffin-wax cartel was exposed and fined a record EUR676 million by the Competition Directorate on 2 October 2008 for illegal price fixing and artificially inflating the price of EU produced candles. This was just prior to the decision to impose provisional anti-dumping duties on imported candles on 14 November. This decision was based on the investigation report covering the period 1 January 2004 – 31 December 2007, in which declines in Community industry sales and profitability are presented as 'evidence' of injury to the Community industry and causation attributed to a corresponding rise in imports from Chinese producers. However, a particularly sharp decline during the period 2004/2005, alongside a sharp increase in the cost of production, is attributed in the report to "the sharp increase in the purchase price of the main raw material used in the production of candles, paraffin" (para. 94). This was the result of the cartel's activities, as uncovered by DG Competition. But, this information is dismissed. Before concluding on causation of injury, the report reads "...the increase in the raw material costs and the cartel could not have had a material impact on the economic situation of the Community industry" (para. 168). This seems remarkably unlikely and is directly contradicted by the evidence. Furthermore, total exports of European produced candles, namely to Norway, Switzerland and the USA, actually increased by 10% during the investigation period. This picture, of a successful

European industry hit by the activities of a *European* cartel, but still able to increase exports, again contradicts that of injured producers struggling under the weight of Chinese imports, as depicted in the investigation.

China, in fact, has been the favoured target of EC anti-dumping activity over the past decade, corresponding with a general rise in Chinese imports into Europe. Raising exports has been an explicit economic strategy of the Chinese government, and a very successful one to date. Fears are rife in Europe that domestic industries are being threatened by cheap Chinese imports that Europe as a region is becoming dependent on. This is not a politically comfortable position. European producers thus find significant support for anti-dumping actions against Chinese exporters in particular, when they choose to pursue them. In reality, China is a low-wage country and has relatively low costs of production. Its exports are therefore very likely to be priced competitively as compared to European products, even below world markets levels. This would mean that these products are being produced and sold according to comparative advantage, rather than a deliberate intention to ‘dump’ them in European markets, even though this is the frequent conclusion of EC anti-dumping investigations (see Davis, forthcoming).

As such, the EU’s anti-dumping regulations can perpetuate unfair trade in certain cases, rather than ‘levelling the playing field’ as is the typical rationale. Overall trends in anti-dumping targeting from the past decade, and the more recent targeting of Chinese products, indicate that there is a danger of anti-dumping being misused for protectionist purposes by industries threatened by globalisation.

CONCLUSION

THIS IS NOT the first or only study to indicate that anti-dumping actions may have little to do with “unfair” trade. J. M. Finger famously described anti-dumping as “legalised backsliding” from the liberalisation gains of multilateral trade negotiations (Finger 1996). i.e. industries faced with rising global competition and falling traditional barriers to trade, are finding new means with which to protect themselves.

This is a view supported by trends in the sectors initiating anti-dumping complaints and the countries being targeted by the EU over the past ten years. Expanding global markets have harmonised economic and political interests in the common goal of curbing perceived Asian threats to European competitiveness, in traditional manufacturing sectors, textiles and higher-value goods as the decade has progressed. Anti-dumping has been a favoured weapon. The problem is that large industry tends to have concentrated and coordinated interests able to lobby effectively at the European level, as evidenced by the large number of anti-dumping requests put forward by representative defence committees and confederations on behalf of Community producers. Conversely consumer groups and user industries, which are more likely to experience rising prices as a result of anti-dumping duties, tend to be more diverse, less concentrated and harder to identify as a ‘common interest’. This means that there is at present a significant imbalance in the interests that are being heeded by decision-makers. Flexible rules which allow considerable scope for political discretion in individual cases, further leave open the possibility for error and political manipulation – another attractive feature for those industries concerned.

Over the past decade, the result has been a pattern of EC anti-dumping action that broadly follows developments in global markets, particularly the emergence of new competitors. Anti-dumping duties usually far exceed bound tariff levels, making them a useful tool for any industry in Europe wanting to maintain market share, prevent new entrants to the market or restructure behind a

wall of protectionism. The legislative and political process of considering complaints and imposing duties has clearly been aligned with industrial interests that have chosen to do this, with definitive measures being the most likely outcome for the most threatened sectors.

In the wake of weakened economic growth, financial crisis and falling global demand, the economic and political popularity of anti-dumping is likely to increase. Fears of falling European competitiveness are already heightened. But, if the benefits of a truly fair and free trading environment are to be realised, targeting fair and legitimate market competitors from abroad through anti-dumping protectionism is not the solution. The current economic climate therefore makes it all the more important that the potential for abuse of anti-dumping is fully acknowledged. And all the more timely for consideration of practical, politically feasible reform of assessment and procedure, that would improve accuracy and make it harder for anti-dumping legislation to be abused.

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FOOTNOTES

1. Thanks to Nanna Matsson, Carl-Johan von Seth and Robin Winkler for research assistance.
2. http://www.wto.org:80/english/news_e/pres08_e/pr542_e.htm, 20 Oct, 2008.
3. For example, a number of decisions were made in 2008 to impose definitive measures, but will feature in this data set under the year the investigation was started.
4. Annex 1 contains a more detailed breakdown of cases, ranked by country, product and year.
5. NB. The percentage given for 2008 is based on only the measures imposed in the first half of the year and hence may not be representative.
6. See annex 1 for the full data set on which this section is based.
7. <http://epp.eurostat.ec.europa.eu>
8. <http://epp.eurostat.ec.europa.eu>
9. Although, the EC very occasionally launch an investigation on their own initiative.

ANNEX 1. ALL INVESTIGATIONS LAUNCHED 1998 – 2008, RANKED BY COUNTRY AND SECTOR.

COUNTRY	SECTOR NAME	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	TOTAL
Algeria	Chemicals		1										1
Argentina	Industrial comp. parts				1								1
Armenia	Metals											1	1
Australia	Chemicals						1						1
	Textiles		1										1
Total			1				1						2
Belarus	Chemicals		1	1		1							3
	Industrial comp. parts										1		1
	Metals											1	1
	Textiles							1					1
Total			1	1		1		1			1	1	6
Bosnia & Herzegovina	Industrial comp. parts										1		1
Brazil	Industrial comp. parts		1					1					2
	Metals											1	1
Total			1					1				1	3
Bulgaria	Chemicals			1									1
	Industrial comp. parts		1										1
Total			1	1									2
Chile	Agriculture					1							1
China	Agriculture									1	1		2
	Chemicals		3	3	2	3	1	3		5	2		22
	Finished goods		2			1			2	3		1	9
	Industrial comp. parts		4	1			1	3	1	1	4	3	18
	Metals			1				2		2		1	6
	Steel	1	1					1				1	4
	Technological		2	2					3				7
	Textiles						1	1	2				4
Total		1	12	7	2	4	3	10	8	12	7	6	72
Croatia	Chemicals			1									1
	Industrial comp. parts	2	1						1				4
Total		2	1	1					1				5
Czech Re-public	Industrial comp. parts		1		2								3
	Steel			1									1
	Textiles	1											1
Total		1	1	1	2								5
Egypt	Chemicals			1									1
	Industrial comp. parts				2								2
	Metals									1			1
Total				1	2					1			4
Estonia	Chemicals			1									1
Faeroe islands	Agriculture					2							2
FYROM	Metals									1			1
Guatemala	Chemicals								1				1
Hong Kong	Finished goods		2										2
	Technological								2				2
Total			2						2				4
Hungary	Industrial comp. parts				1								1
	Steel	1											1
	Textiles	1											1
Total		2			1								3
India	Chemicals		1	3	1			1		1			7
	Industrial comp. parts		1	1	1								3
	Metals										1		1
	Steel	2	1										3
	Technological		1		1	1	1						4
	Textiles	1	1		1				1				4
Total		3	5	4	4	1	1	1	1	1	1		22

Indonesia	Chemicals		1			1				1			3
	Finished goods					1							1
	Industrial comp. parts				1			1					2
	Steel							1					1
	Textiles		1										1
Total			2		1	2		2		1			8
Iran	Industrial comp. parts		1		1								2
Israel	Industrial comp. parts							1					1
Japan	Industrial comp. parts		2	1									3
	Technological		1							1			2
Total			3	1						1			5
Kazakhstan	Chemicals								1				1
	Metals									2			2
Total									1	2			3
Korea	Chemicals		1	1									2
	Finished goods		2										2
	Industrial comp. parts		1		1			1		1			4
	Metals									1			1
	Steel	3		1				1				1	6
	Technological		2						1				3
	Textiles	1	1					1					3
Total		4	7	2	1			3	1	2		1	21
Lao PDR	Industrial comp. parts								1				1
Libya	Chemicals			1									1
	Industrial comp. parts				1								1
Total				1	1								2
Lithuania	Chemicals		2	1									3
	Technological		1										1
	Textiles				1								1
Total			3	1	1								5
Macao	Finished goods		1										1
	Textiles										1		1
Total			1								1		2
Malaysia	Chemicals		1			1				1			3
	Finished goods					1			1				2
	Industrial comp. parts				1					1			2
	Steel			1				1					2
	Technological		1						1	1			3
Total			2	1	1	2		1	2	3			12
Mexico	Steel	1											1
Moldova	Industrial comp. parts											1	1
	Steel						1						1
Total							1					1	2
Morocco	Steel							1					1
Norway	Agriculture					1			1				2
Pakistan	Chemicals						1		1				2
	Finished goods					1							1
	Technological							1					1
Total						1	1	1	1				4
Philippines	Industrial comp. parts								1				1
	Steel							1					1
	Technological							1					1
Total								2	1				3
Poland	Chemicals		1	1									2
	Industrial comp. parts				1								1
	Steel	1				1							2
	Textiles	1											1
Total		2	1	1	1	1							6
Romania	Chemicals			1					1				2
	Industrial comp. parts								1				1
	Steel		1										1
Total			1	1					2				4

Russia	Chemicals		1			2				2			5
	Industrial comp. parts				2	1		1	1		1		6
	Metals			1		1		1		1			4
	Steel			1		2		1					4
Total			1	2	2	6		3	1	3	1		19
Saudi Arabia	Textiles	1					1						2
Slovak Rep.	Chemicals		1										1
	Industrial comp. parts				2								2
Total			1		2								3
Slovenia	Steel		1										1
South Africa	Chemicals									1			1
	Industrial comp. parts		1										1
	Steel	1	1										2
Total		1	2							1			4
Sri Lanka	Industrial comp. parts							1					1
Taiwan	Chemicals		1			1				2			4
	Finished goods	1	1										2
	Industrial comp. parts		5					1					6
	Steel							1				1	2
	Technological		1		1				1	1			4
Total		1	8		1	1		3	1	3		1	19
Thailand	Agriculture									1			1
	Chemicals		1					1					2
	Finished goods		1						1			1	3
	Industrial comp. parts		1		1			1		1	2		6
	Steel			1				1					2
Total			4	1	1			3	1	2	2	1	15
Turkey	Chemicals			1						1			2
	Industrial comp. parts				2	1						1	4
	Metals											1	1
	Steel		1	1									2
	Technological			1									1
Total			1	3	2	1				1		2	10
Ukraine	Chemicals		2	1		1				2			6
	Finished goods									1			1
	Industrial comp. parts	2			1				1				4
	Metals					1				1		1	3
	Steel	1											1
Total		3	2	1	1	2			1	4		1	15
USA	Agriculture											1	1
	Chemicals			1				1		2			4
	Metals											1	1
	Steel					1		1					2
	Technological		1										1
Total			1	1	1	1		2		2		2	10
Vietnam	Chemicals					1							1
	Finished goods					1		1					2
	Industrial comp. parts						1	1					2
	Steel							1					1
	Technological							1					1
	Textiles								1				1
Total						2	1	4	1				8
Yugoslavia	Industrial comp. parts		2										2
Grand Total		22	70	33	29	29	9	41	27	40	14	18	332