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COMMISSION IMPLEMENTING REGULATION (EU) 2026/2101

of 24 September 2026

imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of pea protein originating in the People's Republic of China

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2016/1036 of the European Parliament and of the Council of 8 June 2016 on protection against dumped imports from countries not members of the European Union ([1]) ('the basic Regulation') and in particular Article 9(4) thereof,

Whereas:

1. **PROCEDURE**

1.1. **Initiation**

(1) On 29 August 2025, the European Commission ('the Commission') initiated an anti-dumping investigation with regard to imports of pea protein originating in the People's Republic of China ('the country concerned', 'China' or 'PRC') on the basis of Article 5 of Regulation (EU) 2016/1036 of the European Parliament and of the Council the basic Regulation. It published a Notice of Initiation in the *Official Journal of the European Union* ([2]) ('the Notice of Initiation').

(2) The Commission initiated the investigation following a complaint lodged on 15 July 2025 by the Ad Hoc Coalition of Union Pea Protein Producers ('the complainant'). The complaint was made on behalf of the Union industry of pea protein in the sense of Article 5(4) of the basic Regulation. The complaint contained evidence of dumping and of resulting material injury that was sufficient to justify the initiation of the investigation.

1.2. **Registration**

(3) The Commission made imports of pea protein originating in China subject to registration by Commission Implementing Regulation (EU) 2025/2144 ([3]) ('the registration Regulation').

1.3. **Provisional measures**

(4) On 28 April 2026, the Commission imposed provisional anti-dumping duties on imports of pea protein originating in China by Commission Implementing Regulation (EU) 2026/916 ([4]) ('the provisional Regulation').

([1]) OJ L 176, 30.6.2016, p. 21, ELI: http://data.europa.eu/eli/reg/2016/1036/oj.
([2]) Notice of initiation of an anti-dumping proceeding concerning imports of pea protein originating in the People's Republic of China (OJ C, C/2025/4850, 29.8.2025, ELI: http://data.europa.eu/eli/C/2025/4850/oj).
([3]) Commission Implementing Regulation (EU) 2025/2144 of 21 October 2025 making imports of pea protein originating in the People's Republic of China subject to registration (OJ L, 2025/2144, 22.10.2025, ELI: http://data.europa.eu/eli/reg_impl/2025/2144/oj).
([4]) Commission Implementing Regulation (EU) 2026/916 of 27 April 2026 imposing a provisional anti-dumping duty on imports of pea protein originating in the People's Republic of China (OJ L, 2026/916, 28.4.2026, ELI: http://data.europa.eu/eli/reg_impl/2026/916/oj).

1.4. **Subsequent procedure**

(5) Following the disclosure of the essential facts and considerations on the basis of which a provisional anti-dumping duty was imposed ('provisional disclosure'), the following interested parties filed written submissions making their views known on the provisional findings within the deadline provided by Article 2(1) of the provisional Regulation: the complainant, the two sampled exporting producers' groups Sanjia Group and Shuangta Group, the China Chamber of Commerce of Import & Export of Foodstuffs, Native Produce & Animal By-Products ('CFNA'), representing a number of exporting producers [5], and the user Huel GmbH ('Huel').

(6) The parties who so requested were granted an opportunity to be heard. Hearings took place with Huel and Shuangta Group.

(7) Following provisional disclosure, Huel submitted a reply to the questionnaire for users of the product under investigation. The information provided was assessed in recitals (227) and (228) below.

(8) The Commission continued to seek and verify all the information it deemed necessary for its final findings. When reaching its definitive findings, the Commission considered the comments submitted by interested parties and revised its provisional conclusions when appropriate.

(9) The Commission informed all interested parties of the essential facts and considerations on the basis of which it intended to impose a definitive anti-dumping duty on imports of pea protein originating in China ('final disclosure'). All parties were granted a period within which they could make comments on the final disclosure.

(10) Parties were also granted an opportunity to be heard. No party requested a hearing.

1.5. **Comments on initiation**

(11) Following provisional disclosure, no interested party submitted any further claims on initiation than those referred to in Section 1.4 of the provisional Regulation. The Commission therefore confirmed its findings and conclusions as set out in recitals (7) to (23) of the provisional Regulation.

1.6. **Sampling**

(12) In the absence of additional comments regarding the sampling of Union producers, importers and exporting producers, the Commission confirmed recitals (24) to (33) of the provisional Regulation.

1.7. **Individual examination**

(13) Following provisional disclosure, no exporting producer requested individual examination under Article 17(3) of the basic Regulation. The Commission therefore confirmed recital (34) of the provisional Regulation.

1.8. **Questionnaire replies and verification visits**

(14) In the absence of any comments concerning questionnaire replies and verification visits, recitals (37) to (40) of the provisional Regulation are confirmed.

1.9. **Request for confidentiality by the Union producers**

(15) In the absence of additional comments regarding the request for confidentiality by the Union producers, the Commission confirmed recitals (35) and (36) of the provisional Regulation.

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[5] Yantai Oriental Protein Tech Co., Ltd., Yantai T.Full Biotech Co., Ltd., Yantai Shuangta Food Co, Ltd., Shandong Hua-Thai Foodproducts Co., Ltd., Shandong Jindu Talin Foods Co., Ltd., Zhaoyuan Xiriben Food Stuff Co., Ltd, Shandong Furun Biotechnology Co., Ltd, Yosin Biotechnology (Yantai) Co., Ltd., Linyi Yuwang Vegetable Protein Co., Ltd., Hengyuan Biotechnology Co., Ltd. And Its Related Companies Shandong Jianyuan Bioengineering Co.,Ltd And Jianyuan International Co.Ltd.

1.10. **Investigation period and period considered**

(16) In the absence of comments concerning the investigation period ('IP') and the period considered, the Commission confirmed its conclusions in recital (41) of the provisional Regulation.

2. PRODUCT UNDER INVESTIGATION, PRODUCT CONCERNED AND LIKE PRODUCT

(17) In the absence of any other comments concerning the product under investigation, product concerned and the like product, the Commission confirmed the conclusions reached in recitals (42) to (65) of the provisional Regulation.

3. DUMPING

3.1. **Procedure for the determination of the normal value under Article 2(6a) of the basic Regulation**

(18) In the absence of any comments on the procedure for the determination of the normal value under Article 2(6a) of the basic Regulation, the Commission confirmed its conclusions in recitals (66) to (74) of the provisional Regulation.

3.2. **Normal value**

(19) In the absence of any comments, the Commission confirmed the conclusions reached in recitals (75) to (77) of the provisional Regulation.

3.2.1. *Existence of significant distortions*

(20) In the absence of any comments, the Commission confirmed the conclusions reached in recitals (78) to (175) of the provisional Regulation.

3.2.2. *Representative country*

(21) In the absence of any comments, the Commission confirmed the conclusions reached in recitals (176) to (197) of the provisional Regulation.

3.2.3. *Sources used to establish undistorted costs*

(22) As set out in recital (72) of the provisional Regulation, on 9 February 2026, the Commission informed interested parties of the relevant sources it intended to use for the determination of the normal value by a note (the Note). In that note, the Commission provided a list of all factors of production such as raw materials, labour and energy used in the production of the product concerned. The comments received by interested parties were addressed in section 3.2.2. of the provisional Regulation. Following provisional disclosure, the complainant and the two sampled exporting producers submitted comments on the selection and categorization of some raw materials and by-products, as described in detail in recitals (23) to (75) below.

3.2.4. *Factors of production*

3.2.4.1. Raw materials

Yellow Pea and Organic Yellow Pea

(23) Following provisional disclosure, Shuangta Group contested the Commission's conclusions in recital (218) of the provisional Regulation that given the specific situation of the Chinese pea market caused by the Russian exports at below normal market prices having depressing effect on the overall market price, the import prices of yellow pea into China cannot be considered as not distorted. Shuangta Group reiterated that most of the yellow peas it purchased were directly imported from outside of China and paid for in foreign currency and therefore prices linked to these purchases were to be considered as not distorted. Additionally, Shuangta noted that the unit price of purchases from domestic traders was above the price paid for international purchases and argued that this would be proof that even domestic purchases were undistorted.

(24) First, Shuangta Group claimed that the Commission's provisional conclusions were based on a misrepresentation of the facts. The company argued that the monthly average import volumes of yellow peas from Canada increased after China implemented a 100 % tariff against imports of Canadian yellow peas in March 2025. Even if these duties had distorted the prices on the Chinese market, they would have only done so for the last months of the investigation period. Moreover, as Shuangta Group imported yellow peas under an inward processing regime, its imports of yellow peas were not subject to these tariffs.

(25) The Commission recalled that the effect of Russian yellow peas on international prices was set out in the Note, observing that after the imposition of 50 % ad-valorem custom duties in the Union following Russia's war of aggression against Ukraine ([6]), an immediate drop of exports of Russian yellow pea into the Union coincided with a significant increase of exports of Russian yellow peas into Türkiye. The significant lower import price into Türkiye when compared to the import prices of yellow peas into markets where no Russian yellow peas were imported, was listed as a reason to disregard the benchmark price of yellow peas into Türkiye. Furthermore, in its comments on the Note, Shuangta Group agreed that there were certain elements that would render the selection of Türkiye as representative country inappropriate.

(26) Regarding Shuangta Group's claim that the conclusions reached in the provisional Regulation were based on a misrepresentation of the facts following the imposition of tariffs on Canadian yellow peas, the Commission noted that its findings were not based exclusively on the effect of those tariffs, but on the overall situation of the Chinese yellow pea market, including the significant increase of low-priced Russian yellow pea imports into China and the resulting depressing effect on prices. The fact that Shuangta Group imported yellow peas under an inward processing regime did not alter the conclusion that import prices into China as a whole were affected by the specific situation of the Chinese market. Likewise, the fact that Shuangta Group imported yellow pea paying in foreign currency, did not alter the conclusion that the price paid was affected by the specific market situation in China. Shuangta Group itself did also not explain how this fact could have altered the Commission's conclusions. Finally, the claim that unit price of purchases from domestic traders was above the price paid for international purchases, did not as such alter the conclusion that the price of yellow pea in China was influenced by the massive increase of imports of Russian yellow pea. All claims made in this regard were therefore rejected.

(27) On its comments on the final disclosure, Shuangta Group claimed that the Commission had failed to explain how its assertion in recital (214) of the provisional regulation that the tariffs imposed on Canadian price had resulted in a drop in volumes of 25 % could remain valid after Shuangta Group presented evidence showing that volumes between March and June 2025 were above the monthly averages before the tariff entered into force.

(28) The Commission pointed to recital (214) of the provisional Regulation, where it was explained that the comparison had been made between the average monthly volumes before the entry in force of the duties and the rest of the year (April to December 2025) ([7]), which showed that, not only had the volume of imports from Canada dropped, but that the volume of Russian imports grew disproportionately in the Chinese market during this period, from an import share of 37,5 % before the tariffs, to an average share of 66 % for the rest of the year, further strengthening the distorting effect of Russian pea. To account for seasonality, the Commission also ran a comparison between the import volumes of Canadian yellow pea between April – December 2024 and April – December 2025, which further confirmed the 25 % decrease in volumes of Canadian yellow pea, and a stark increase of Russian market share, from 44 % to 66 % of total imports. As Shuangta Group failed to present any evidence contradicting this development, its claim that recital (214) is not factually valid, was rejected.

([6]) Council Regulation (EU) 2024/1652 of 30 May 2024 amending Annex I to Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff (OJ L, 2024/1652, 10.6.2024, ELI: http://data.europa.eu/eli/reg/2024/1652/oj).

([7]) Given that the duties became effective mid-March, the comparison was made between the two first months of the year without effect of the measures (January & February 2025), and the months following the imposition of the measures (April to December 2025). The drop in volumes between these two periods amounted to 25,4 %.

(29) Second, Shuangta Group further contested that, as established in recitals (209) to (218) of the provisional Regulation, Canadian import volumes and prices of yellow peas into China decreased in parallel to the increase of Russian imports of yellow peas into China. In this regard, Shuangta Group argued that changes to the base year used for the analysis of the import price evolution of Canadian yellow pea, i.e. by basing the trend in 2021 instead of 2022, showed an overall positive trend.

(30) Regarding Shuangta Group's claim that year 2021 had to be used as base year for establishing the price trend of yellow peas instead of 2022, the Commission considered that given that Russian yellow pea started entering China in March 2023, the year immediately prior to the significant increase of such imports, i.e. 2022 would show the direct impact of Russian imports on the yellow pea prices in China and was therefore more appropriate than 2021. A comparison between the twelve months before the penetration of Russian yellow peas in the Chinese market, and the twelve months immediately after (March 2022 to February 2023 vs March 2023 to February 2024), shows a decrease of import price of pea into China by 22,7 % from 3,59 CNY/kg to 2,78 CNY/kg, as a direct consequence of the penetration of low priced Russian yellow peas in the Chinese market. Shuangta did not provide any specific reason why the year 2021 would have been more appropriate. This claim was therefore rejected.

(31) Shuangta Group further argued that the price differential between Canadian and Russian import prices into China would have remained stable between 2023 and the investigation period.

(32) On Shuangta Group's claim that the price differential between import prices from Canada and Russia would have remained stable since 2023, the Commission noted that this development indeed confirmed the distortive effect of Russian yellow peas, rather than contradicting the Commission's conclusions in this regard. Thus, prior to the significant increase in volume of yellow pea imports from Russia in the Chinese market, import prices into China followed international price trends ([8]). However, once Russian yellow peas entered massively the Chinese market, import prices in China decoupled from broader international price trends and began to track Russian price movements, indeed maintaining a roughly stable price differential.

(33) This divergence in trends between Chinese import prices and international price trends became even more pronounced following the imposition of an ad-valorem duty rate of 50 % on yellow pea from Russia into the Union in July 2024 following the Russian Federation's full-scale invasion of Ukraine on 24 February 2022. Whereas international prices of yellow peas in markets with marginal or no presence of Russian yellow pea ([9]) continued to follow an upward trajectory, the prices of yellow peas decreased abruptly in China. The timing of this divergence coincides with the rapid increase in Russian import's market share in China and the redirection of Russian exports of yellow peas from the Union to China following the loss of access to the Union market. The result is a persistent decline in Chinese import prices relative to import prices of yellow peas observed in markets with marginal or no presence of Russian yellow pea not exposed to Russian competition. This claim was therefore rejected.

(34) In their comments on the final disclosure, both Sanjia Group and Shuangta Group contested the Commission's findings that import prices of yellow peas into China had decoupled from international price trends after the significant increase in the volume of imports of Russian yellow pea into the Chinese market and noted that import prices into China were already lower than international market prices in 2021, before large-scale Russian imports commenced in 2023. Shuangta added that international import prices and Chinese import prices only converged during 2022, and that their divergence from the second semester of 2023 ('2023-S2') onwards does not constitute a decoupling of price trends, given that both follow the same overall pattern.

(35) Moreover, Sanjia claimed that trade data does not show a divergence in the prices of Canadian pea in China when compared to other overseas markets.

([8]) International price trends: semester-by-semester price evolution of import prices from all origins into all destinations (excluding China).
([9]) Markets with 10 % or less of Russian imports.

(36) The Commission noted that Sanjia Group's analysis was based on annual figures, which could not capture nor faithfully reflect changes in trade flows or import prices, as the main events affecting the imports of yellow peas took place in the middle of the calendar year, and the IP was set in two different years. Shuangta Group's claim that prices only converged in 2022 overlooks that the comparison made in recitals (32) to (33) is based on price trends, which are different that absolute prices. Supposing that the first semester of 2021 was considered the base period for the trend, it is clear that the price trends were closely linked even in 2021. Regarding the period after the entry of Russian yellow pea into China, so as of 2023-S1, the fact that the price trends loosely reflect the same movements, which is common for agricultural goods due to harvesting cycles, does not negate that the price variation in imports into China and international prices diverged significantly. Moreover, if one was to compare the price trends between imports into China from all other origins and import prices into markets with marginal or no presence of Russian yellow pea, one would see that the price surge in markets unaffected by Russian imports, after the imposition of duties in imports of Russian yellow pea into the Union market, was not mirrored by the prices in the Chinese market. A semester-by-semester trend showed that from the irruption of Russian yellow pea into China in the first semester of 2023 to the IP, import prices from all origins other than Russia into China dropped by 4 %. In the same period, import prices in markets unaffected by Russian imports of yellow pea increased by 11 %, proving the divergence in pricing trends between China and other overseas undistorted markets of yellow pea. Therefore, all claims were rejected.

(37) Regarding the price differential between imports of yellow peas into China originating in Russia and from all other origins, Shuangta Group argued that assuming that Canadian exporters had adjusted their prices in response to Russian competition, 'one would expect the differential between Canadian and Russian prices to narrow', and claimed that the Commission presented no evidence in this respect.

(38) The Commission explained in recital (213) of the provisional Regulation, as well as recitals (32) to (33) above that the analysis of international price trends in markets unaffected by Russian yellow pea shows an upwards price trend in the period between 2023-S1 and the IP, which was not replicated by the prices of Russian yellow pea in China. Had imports from other origins continued to follow international price trends, they would have grown at a rate similar to prices in unaffected markets, increasing the price differential with imports of yellow pea from Russia. However, the price pressure of Russian imports forced the de-coupling from international price trends and prevented the natural price growth that the undistorted markets were experiencing. Therefore, the fact that the price differential remained stable, in a context where it should have increased, confirms the conclusions reached in recital (218) of the provisional Regulation

(39) Moreover, Shuangta Group repeated that the conclusions reached were dependent on the choice of 2022 as the base year for the price comparison and noted that international prices excluding China also peaked in 2022 and declined in the first semester of 2023, arguing that the price drop observed in Chinese prices was not necessarily a response to the increase of imports from Russia into the Chinese market.

(40) The Commission explained its rationale for the selection of 2022 as a base year in recital (30), to which Shuangta provided no plausible objection. Moreover, the comparison between the entire year 2022 and the first semester of 2023 was not appropriate, as the Russian yellow pea started entering the Chinese market only in the middle of the first semester in 2023. With this in consideration, the Commission had provided, in recital (30), a monthly-based comparison for higher accuracy, which showed a decrease in import prices into China of 22,7 %, at a moment when international prices decreased significantly less, i.e. by 13,3 %. The significantly larger price drop in China, during a period where low-priced Russian imports passed from non-existent to almost 40 % of the market share, clearly points to this irruption of cheap peas as the cause for the disproportionate price depression in the Chinese market. Therefore, the claim was rejected.

(41) On its comments on provisional disclosure, Shuangta Group also argued, contrary to the Commission's findings in recital (217) of the provisional Regulation, that in markets where Russian imports were low, Canadian yellow peas have been imported at stable prices, prices into Taiwan and the USA would have decreased even in the absence of imports of yellow pea from Russia.

(42) Regarding the claim that in some markets with marginal or no presence of imports of Russian yellow pea, namely Taiwan and the USA, prices would also have decreased between 2022 and 2025, the Commission considered that this did not devaluate the overall conclusion that Russian imports of yellow peas had a depressing effect on the prices in the Chinese market that was confirmed by the statistical evidence, including by import statistics in other third country markets. The fact that single markets did not follow the overall trend of import prices is thus not sufficient to devaluate the conclusion that global price trends are influenced by the effect of Russian yellow pea exports. Finally, both, in Taiwan and the USA, the price per kg of yellow pea was in line with international prices in markets with marginal to no presence of Russian yellow peas imports, and significantly higher than Russian import prices of yellow peas into China, confirming the depressing effect of Russian yellow pea prices on international prices. This claim was therefore rejected.

(43) In its comments on the final disclosure, Shuangta Group insisted that the Commission had failed to take into account conflicting evidence regarding Taiwan and the United States, and subsequently had failed to address Shuangta's claim that Canadian prices remained stable in markets where Russian imports were marginal or absent.

(44) The Commission noted that between 2022-S1 and the IP, import prices into the US increased significantly, contradicting the claim made by Shuangta Group. While prices into Taiwan did decrease, they did so by 2 %, far from the 15 % price drop observed in China. This claim was therefore rejected.

(45) Third, Shuangta Group claimed that the conclusions reached in recitals (209) to (218) of the provisional Regulation would be inconsistent with Article 2(6a) of the basic Regulation. In particular, Shuangta Group argued that the Commission had failed to establish any substantial government intervention affecting the import price of Canadian yellow peas into China and to assess other elements that could have affected said prices; that the Commission's stance that import prices into China cannot be considered as not distorted may not be used to presume distortion on the absence of any proof to support such alleged distortion; that the sales trends of yellow peas in China resulted from external, market-driven developments, rather than any form of substantial government driven development; and that the Commission's approach in this case is violating the principle of legal certainty on its interpretation of article 2(6a) of the basic Regulation.

(46) On Shuangta Group's claim that the Commission failed to establish any government intervention on prices of Canadian yellow pea prices in line with Article Art 2(6a) of the basic Regulation, the Commission recalled that the Commission is not obliged to establish such a government intervention. In line with its legal obligations imposed by Article 2(6a)(a) of the basic Regulation, the Commission has established the existence of significant distortions in China in the provisional regulation (section 3.2.1). When such distortions are established for a country concerned, according to Article 2(6a)(a) of the basic Regulation, domestic costs may be used '*only to the extent that they are positively established not to be distorted, on the basis of accurate and appropriate evidence*'. The Commission found that the Union sanctions on imports of yellow pea from Russia, severely altered the pattern of trade and price trends of yellow peas in China thereby distorting them. Shuangta Group, on the other hand, provided no evidence capable of altering that conclusion or otherwise allowing the Commission to positively establish that the costs in question were not distorted.

(47) In the light of the above the Commission confirmed that given the specific situation of the Chinese yellow pea market caused by the Russians imports at below normal market prices having depressing effect on the price of yellow peas in China, the import prices of yellow pea from all other origins into China cannot be considered as not distorted. Therefore, in accordance with Article 2(6)(a) of the basic Regulation, it was not appropriate to use the purchase price of yellow peas reported by the sampled exporting producers when constructing the normal value. The claims to use actual purchase prices for imported peas were therefore rejected.

(48) Following these findings, Shuangta's claim that the higher purchase price of yellow peas sourced from domestic traders when compared to its imports of yellow peas, raised in recital (23), was evidence of the lack of distortions on yellow pea prices in the domestic market was rejected.

(49) Fourth, Shuangta Group claimed that the volume of imports of yellow peas into Brazil during the investigation period would have been very limited when compared to Shuangta Group's own purchases. Therefore, Shuangta Group's purchase price would much better reflect the conditions of large purchasers and should be used as the source for the benchmark price of yellow peas.

(50) As explained in recitals above, the Commission considered that the import prices of yellow pea from all other origins into China cannot be considered as not distorted and that the purchase price of yellow peas reported by the sampled exporting producers could not be used when constructing the normal value. The claim that the volume of imports of yellow peas into Brazil during the investigation period are limited in comparison to Shuangta Group's own purchases does not demonstrate that the import prices in Brazil are unrepresentative nor unreliable. Therefore, Shuangta Group's claim that its own purchase prices should be used as the source for the benchmark price of yellow peas was rejected.

(51) Sanjia Group seconded Shuangta Group's claim that the Commission had failed to analyse other elements that could have affected import prices of yellow peas into China and suggested that the lower prices on the Chinese market may be caused by the strong bargaining power deriving from high demand. To this end, Sanjia Group pointed out that import prices into China were below international prices even before Russian yellow peas began entering the Chinese market. Finally, Sanjia Group pointed out that the prices of Canadian yellow peas into China were comparable to the prices into other markets, contradicting the Commission's conclusion that prices of Canada's exports to China would be depressed.

(52) In its comments to the final disclosure, Shuangta Group contested the Commission's decision not to accept the purchase prices reported by Shuangta Group and claimed that it was contrary to Article 2(6a) of the basic Regulation. Shuangta Group argued that the Commission had failed to explain how Article 2(6a) concerning domestic prices and costs had been extended to imported inputs and argued that the legal standard applied in the case at hand was contrary to the one adopted in the anti-dumping case concerning import of tyres from China ('tyres case') ([10]).

(53) At the outset the Commission notes that Article 2(6a)(a) of the basic Regulation concerns rejection of 'domestic prices and costs in the exporting country' in cases of significant distortions. In such cases, domestic costs may be used 'only to the extent that they are positively established not to be distorted'. The price of peas incurred by the exporting producers in China is a 'domestic cost' within the meaning of Article 2(6a)(a), regardless of the origin of the peas.

(54) The Commission noted that each case has to be assessed on its own merits and that the specific circumstances of both investigations were different. In the tyres case, the question was whether Russian imports of rubber and other raw materials had an impact on general import prices of these raw materials into Türkiye, which was being assessed as a possible representative country in that specific case. This analysis did not find enough evidence suggesting that import prices originating in Russia were affecting all other import prices into Türkiye to reject the selection of Türkiye as a representative country. In fact, in the tyres case it was found that despite the presence of Russian imports in the Turkish market, average import prices were similar to import prices in markets unaffected by Russian imports. In the present case, the Commission has presented the appropriate evidence showing the effect of the massive entry of yellow pea originating in Russia on the import prices into China. This evidence also shows that import prices into China were lower than import prices into countries unaffected by Russian imports of yellow peas. Given that the material evidence and resulting findings in both cases were clearly different, the claim was dismissed.

(55) As regards Sanjia Group's claims on the elements affecting import prices of yellow peas into China, the Commission recalled the findings set out in recital (47), according to which import prices into China decoupled from broader international price trends once Russian yellow peas entered massively the Chinese market. Therefore, the Commission considered that the arguments raised by Sanjia Group did not call into question the conclusion that Russian yellow pea imports had a depressing effect on yellow pea prices in China. Sanjia Group did not bring any evidence about the bargaining power effect in China. This aspect of the claim was considered as unsubstantiated. These claims were therefore rejected.

([10]) Commission Implementing Regulation (EU) 2026/1540 of 6 July 2026 imposing a definitive anti-dumping duty on imports of new pneumatic tyres, of rubber, of a kind used in motor cars, buses or lorries with a load index exceeding 121 ('tyres') originating in the People's Republic of China (OJ L, 2026/1540, 7.7.2026, ELI: http://data.europa.eu/eli/reg_impl/2026/1540/oj).

(56) Moreover, Sanjia Group claimed that the benchmark price based on import prices of yellow peas into Brazil, as established in the Note, could be distorted given that it was significantly above global average import prices, and requested the Commission to investigate whether any adjustments would be required.

(57) Regarding Sanjia Group's claim that import prices of yellow peas into Brazil were largely above international prices and may need to be adjusted for accuracy, the Commission considered that the import prices, as reported in the note and the provisional Regulation were nonetheless in line with international prices in markets with marginal or no presence of Russian yellow peas imports. This claim was therefore rejected.

(58) In its comments on final disclosure, Sanjia Group reiterated that the import prices of yellow pea into Brazil were unrepresentative of undistorted international prices, and that the resulting benchmark deviated from fair international benchmark prices. Sanjia claimed that, given that a 17 % price difference had been enough to consider import prices into China as decoupled from international market, in reference to the findings in recital (32), import prices into Brazil, which were 37 % above global import prices of yellow pea excluding those of Russian origin, should also be considered as decoupled, and therefore not representative.

(59) The benchmark price stated in the note is a duty-paid price, composed of the import price of yellow peas into Brazil, plus the applicable import duties, therefore the comparison made by Sanjia Group was based on erroneous assumptions. In any case, as explained in recital (33), what prevents the Commission from considering import prices of yellow peas from all origins into China as undistorted is the fact that they have been subject to downwards pressure exerted by the massive entry of Russian yellow pea after the imposition of duties in the Union, which effectively closed the Union market to Russian yellow pea, not solely the fact that prices are low. Therefore, the claim was dismissed.

(60) Finally, the complainant argued that the 57 % price premium that the Commission applied to the benchmark for organic pea , as it has been established in recitals (203) – (208) of the provisional Regulation, would not be representative of the price difference between conventional and organic peas, and provided publicly available information indicating that the price of organic yellow peas was at least 150 % higher than the price of conventional yellow peas, claiming that the 57 % premium significantly underestimated organic yellow pea prices, leading to an understatement of the constructed normal value.

(61) Regarding the benchmark for organic yellow pea the Commission noted that the information provided by the complainant following provisional disclosure related to a period after the investigation period, or was only partially overlapping with it, and applied exclusively to Canadian yellow pea. This information could therefore not devaluate the findings of the Commission in this regard, and consequently the Commission confirmed, based on the information available, the provisional conclusions that a price premium of 57 % for organic pea was reasonable and appropriate. The Commission thus rejected the claim made in this regard.

Clean Pea (Organic and conventional)

(62) Following provisional disclosure, the complainant expressed its concerns about the confidential nature of the benchmarks for clean pea and clean organic pea, claiming that is prevented them from meaningfully assessing the adjustments made to reach these benchmarks.

(63) The benchmark for clean peas was only applied in the case of Shuangta Group and based on company specific confidential data on sourcing of its raw materials that could not be disclosed. To construct the benchmark for clean pea (organic and conventional) the Commission used the corresponding benchmarks for yellow pea or organic yellow pea, where appropriate and adjusted it by adding the undistorted costs of the screening operation. To this end, the Commission added to the value of yellow pea the undistorted labour and energy cost as well as the selling, general and administrative ('SG & A') costs and profit margins of the producer producing a similar product in the representative country, as identified during the investigation.

(64) Shuangta Group contested the level of SG & A cost and profit margins used to construct the benchmark of clean pea. These claims have been summarized and addressed in recitals (98) to (100) below.

(65) In the absence of any other comments with regard to the benchmark of yellow peas and organic yellow pea, the findings in recitals (203) to (218) of the provisional Regulation are confirmed.

Defoaming agents

(66) In the absence of comments, the Commission confirmed the conclusion reached in recitals (219) to (224) of the provisional Regulation.

Pea Fiber

(67) Following provisional disclosure, the complainant re-iterated that pea fiber was to be treated as a co-product of pea protein, and not as a by-product, arguing that including pea fiber in the list of by-products would artificially reduce the production cost of pea protein.

(68) As explained in recitals (225) to (227) of the provisional Regulation, the inclusion of 'pea fiber' in by-products was based on the information provided by the exporting producers in their questionnaire reply. The by-products reported did, however, not always have consistent technical names or descriptions that were widely used across the board. Thus, in this specific case, the exporting producers had identified 'pea fiber' as a by-product in their reply, while the investigation revealed that characteristics of this by-product corresponded in fact to pea residue, classified under HS6 code 230250 'Bran, sharps and other residues, whether or not in the form of pellets, derived from the sifting, milling or other working of leguminous plants'. Therefore, the initially reported 'pea fiber' was treated as a by-product, pea residue, in this investigation and the claim made in this regard was rejected.

(69) In the absence of any other comments concerning pea fiber, recitals (225) to (227) of the provisional Regulation are confirmed.

By-Products

(70) Following provisional disclosure, Shuangta Group objected to the classification of bad-quality pea and half-peas that were removed during the screening process as by-products, and claimed that despite being rejected, they were identical to cleaned peas, and as such, should be subject to the same benchmark price or, at least, to the benchmark for uncleaned yellow peas. The company pointed to its own records, which showed the per unit cost of non-qualifying peas (whole and split) was only slightly below the average purchase price of qualifying peas.

(71) Regarding Shuangta Group's claim that peas rejected during the screening process should be subject to the same benchmark as those used in the further production process of pea protein, the Commission noted that the investigation revealed that the company itself treated yellow pea by-products (whole and split) as bad-quality pea that were not further processed into pea protein, and therefore this claim was rejected.

(72) Moreover, Shuangta Group's claim that in its internal records the per-unit cost of non-qualifying pea was only slightly below the purchase price of qualifying peas was found not to be relevant, given the significant distortions in place, as detailed in recitals (78) to (175) and (212) to (218) in the provisional Regulation and as confirmed at definitive stage in recital (65), that rendered costs in China unreliable.

(73) The complainant requested the Commission to provide additional explanations regarding the classification of by-products.

(74) Regarding the complainants' request for clarification on the classification of by-products, the Commission considered that based on the information in the file, all by-products reported by the exporting producers could be categorized as pea residue regardless of their physical shape (powder, brans, shells, fragmented peas, etc).

(75) In the absence of any other comments regarding the benchmark for by-products, the conclusions in recitals (228) to (230) of the provisional Regulation are confirmed.

(76) Following the final disclosure, Shuangta Group reiterated its claims regarding by-products, but did not bring new arguments or evidence other than those already provided in its comments on the provisional Regulation and requested the Commission to reconsider its assessment in this regard. The Commission's assessment remained unchanged and claims were rejected.

Other factors of production (labour, electricity, natural gas, steam and water)

(77) In the absence of comments, the Commission confirmed the conclusion reached in recitals (231) to (238) of the provisional Regulation.

3.2.4.2. Manufacturing overhead costs, SG & A costs and profits

(78) In the absence of comments, the Commission confirmed the conclusion reached in recitals (239) to (247) of the provisional Regulation

Calculation

(79) Following the provisional disclosure, Shuangta Group requested clarification on the application of Article 18 of the basic Regulation with regard to the determination of its dumping margin claiming that this would ensure the company to fully exercise its procedural rights, such as to request the intervention of the Hearing Officer.

(80) By letter of 9 February 2026, prior to the provisional disclosure, the Commission informed Shuangta Group of the possible application of Article 18 of the basic Regulation. Subsequently, Shuangta Group requested the intervention of the Hearing Officer noting that having a copy of the mission report was needed to properly respond to the Commission's allegations. The Hearing Officer recommended the service to (i) disclose, as per its standard practice, the mission report promptly, and (ii) offer Shuangta Group an opportunity to make further comments, also on the basis of the mission report, at a hearing with the service. As soon as the report was finalised, the service followed the recommendations and provided the mission report on 19 February 2026. Following the comments on the provisional disclosure, the Commission provided additional information that was previously erroneously omitted, clarifying the application of facts available within the meaning of Article 18 and granted Shuangta Group an additional time to comment thereon.

(81) The Commission therefore considers that at no point during the investigation the company was prevented from exercising its procedural right and the claims made in this regard were rejected.

(82) Shuangta Group in its comments to the provisional disclosure reiterated their claim that the Commission did not clearly state whether Article 18 of the basic Regulation has been used.

(83) Shuangta Group also re-iterated that the Commission did also not specify the reason for which Article 18 of the basic Regulation was used. In this regard Shuangta Group alleged that Article 18 of the basic Regulation could not be used as a legal basis to change historically used cost allocations arguing that the sole legal basis for changing cost allocations would be Article 2(5) of the basic Regulation. Shuangta Group argued further that since the issue identified was merely linked to the determination of the ownership of the pea but not the quantity and value of cleaned pea used in the production process, the cost allocation method was not affected by it as such and therefore, could not have been subject to the application of Article 18 of the basic Regulation. Finally, according to Shuangta Group, the application of Article 18 of the basic Regulation which concerned the transfer of ownership of yellow pea being unverifiable by the Commission, should only apply to purchases of yellow peas that were transferred for further processing to the related company as other channels were not affected.

(84) The Commission considered that it was apparent not only from recitals (254) to (258) of the provisional Regulation but also from the Specific Disclosure, that *'the Commission partially relied on facts available within the meaning of Article 18 of the basic Regulation'*. This claim was therefore rejected.

(85) Furthermore, the Commission reiterates that it was unable to trace the ownership of purchased raw materials—yellow pea. Therefore, the Commission was unable to verify the volume of yellow pea sold or transferred to the related processing company and whether there was a transfer of ownership of yellow pea from Shuangta to the related processing company. As a consequence, Shuangta was not able to provide any evidence that would have confirmed that the related processing company was entitled to sell the processed product (clean pea) back to Shuangta at a price covering raw material costs and a processing fee.

(86) Since the Commission was unable to verify the transfer of ownership of the yellow pea and the title on which the related processing company came into possession of these raw materials, the value —not only of the raw materials but also of the clean pea— could not be verified. Thus, the Commission applied Article 18 of the basic Regulation and based its findings on the first verifiable step in the production process, namely the further processing of clean pea. For this purpose, the Commission resorted to the input volume of clean pea used for the production of pea protein.

(87) Moreover, the investigation has shown that for the allocation of yellow pea to the production costs of the product under investigation, Shuangta Group used an allocation key based on the value of clean pea. The Commission, as already explained in recitals (256) to (258) of the provisional Regulation, the Specific Disclosure and recitals (85) to (86) above, could only rely on the quantities of clean pea. In the absence of reliable values in the allocation formula, the Commission analysed the data available and resorted to an alternative methodology. For these reasons, and for the reasons set out in recitals (84) to (86) above the Commission rejected Shuangta Group's cost allocation method and used facts available instead. The claims made in this regard were therefore rejected.

(88) Regarding Shuangta Group's claim that the application of facts available within the meaning of Article 18 of the basic Regulation should only apply to the yellow pea purchased by the Shuangta and then transferred to its related processing company, the Commission noted that the related processing company obtained yellow pea from both, Shuangta (under an unknown title) and from domestic traders, and that there was therefore no clear separation between these two products. Shuangta Group was not able to present any evidence that would allow the Commission to clearly link yellow pea purchased from domestic traders with subsequent sales of clean pea from the related processing company to Shuangta. Therefore, the values of each of these products could not be identified and verified and the Commission therefore considered the value of the entire clean pea reported by the company unreliable.

(89) Thus, Shuangta Group's claims regarding the unjustified application of Article 18 were rejected.

(90) Shuangta Group further claimed that the rejection of the company's historical cost allocation method was not justified and in violation of Article 2(5) of the basic Regulation. In its comments to the provisional disclosure, Shuangta Group reiterated its arguments made prior to the provisional disclosure. In addition, they claimed that their historically used allocation method had been verified by the Commission as well as all necessary data concerning the quantity of clean pea used for production of pea protein. Therefore, it would not have been appropriate to change the historically used allocation method. Shuangta Group also claimed that the Commission did not question the cost allocation method or requested any further information in this regard, prior to the Commission letter of 9 February 2026 where it informed the company of the potential use of Article 18 of the basic Regulation.

(91) The Commission provided findings and reasoning regarding the rejection of the cost allocation method used by the company not only in its letter of 9 February 2026, but also in recitals (252) to (257) of the provisional Regulation and in more detailed in confidential specific disclosure document as described in recitals (79) to (80). The Commission considered therefore that it had preserved Shuangta Group's all procedural rights under the basic Regulation and had informed in a timely and comprehensive manner the company about the possible application of facts available. This claim was therefore rejected.

(92) Shuangta Group also claimed that the Commission's determination that its allocation method resulted in high profitability of the product concerned and the allocation of losses to the main production line, was in contradiction with data provided by Shuangta Group following provisional disclosure. However, the Commission's findings were based on the information provided by the company during the verification visit. Therefore, the Commission considered all evidence and information available during the investigation and concluded on that basis that the cost allocation method used by the company has to be rejected. The information provided following provisional disclosure could not be verified anymore. Therefore, the Commission's findings in this regard were confirmed, and Shuangta Group's claims on the replacement of the cost allocation method rejected.

(93) Shuangta Group, in the event the Commission applied the alternative allocation method, claimed that the Commission should base the calculation of the ratio of pea protein in the total production of all products based on the turnover of 2024 and 2025, since they coincide with the investigation period. Alternatively, if years outside the investigation period are taken into account, the company claimed that the entire period from 2021 to 2025 should be considered.

(94) However, the Commission used data from 2023 and 2024 because the audited financial statements were available at the time of the verification and was therefore considered the most appropriate. The data pertaining to the years 2024 and 2025 were only submitted following the provisional disclosure and could not be verified anymore. Therefore, this claim was rejected.

(95) Shuangta Group further argued that SG & A costs and profit should only be applied for constructing the benchmark for clean pea in cases where the yellow peas were processed by the related processing company. In particular, Shuangta Group argued that since the application of Article 18 of the basic Regulation concerned only the ownership of the yellow pea transferred to the related processing company, the Commission should not add any SG & A costs and profit for the processing activities carried out by Shuangta Group itself without involving the related processing company, when constructing the benchmark for clean pea.

(96) The Commission recalled that it was unable to verify the transfer of ownership of the yellow pea between the related companies, and thus unable to confirm the volume of yellow pea retained by Shuangta, on the one hand, and the volume of yellow pea transferred to the related processing company on the other hand. The Commission based its findings therefore on the volume of clean pea used as an input for the production of the product concerned across the board. For this reason, the claim was rejected.

(97) Moreover, the Shuangta Group did not report any labour cost for the processing activities carried out by it ([11]). This is based on detailed confidential cost data provided during the investigation and verified during the on-spot verification. During the verification visit, the company confirmed that the cost of employees for this activity was covered by the related processing company ([12]). Therefore, constructing the benchmark of clean pea by adding SG & A costs and profit was warranted, and the claim was rejected.

(98) Finally, Shuangta Group claimed a number of calculation errors with an alleged impact on SG & A costs used when constructing the benchmark of clean pea, the value of by-products and also claimed a partial double counting of consumables.

(99) First Shuangta Group claimed that, in any event, the SG & A costs and profit used for constructing the benchmark of clean pea was too high, considering the limited processing functions of the related processing company. Shuangta Group argued that the SG & A costs and profit of Caramuru Alimentos S.A., the producer of soy protein in the representative country ([13]), that was used for the construction of the benchmark, was not representative for a processing company, which conducts merely the screening of the pea and suggested to use no more than 6,89 %.

([11]) Information contained in verification exhibit VE-23.
([12]) Information contained in mission report point 4.3.1 'Cost Allocation'.
([13]) See recital (194) of the Provisional Regulation.

(100) The screening and cleaning of the main raw material (yellow pea) and the further processing of the clean pea into pea protein is part of the one and same production process. Thus, the Commission found that the SG & A costs and profit of an integrated producer is appropriate for the whole process, including the screening activity. Since the SG & A costs and profit of soy protein producers are from the same industry sector to which the related processor belongs, the use of the SG & A costs and profit of the company in the representative country was considered appropriate when constructing the benchmark for clean pea, because it reflected the costs borne by companies operating in the same sector. In addition, Shuangta Group did not offer any evidence that would support the claims made nor did it identify any company in the representative country that was merely involved in screening processes, and which had readily available financial data. Therefore, all claims in this regard were rejected.

(101) Second, Shuangta Group alleged that by-products of organic pea protein, after the change in the allocation method, were understated. They argued that since the quantity of clean pea allocated to the product concerned increased, the same should be reflected in the by-products. The Commission accepted this claim and applied the average volume output of by product per unit of raw material, organic pea, used to the allocation of by-product consumption.

(102) Third, Shuangta Group argued that since the Commission calculated the consumption based on the average consumption per kilogram of the finished product, there was no need to count pea protein reused as an input for some of the other finished product concerned. The company claimed that part of the consumables should therefore be excluded from the total value of consumables.

(103) The Commission noted that the claimed double-counted values were not included in the materials reported under consumables. Moreover, the volumes of pea protein reused for production were deducted from the total volume of the finished products. Therefore, the Commission was unable to identify double-counted volumes based on the data provided by the company, and the claim was rejected.

(104) Following the final disclosure, Shuangta Group reiterated its position on the change of the allocation method for the purpose of establishing the consumption of the input materials. Shuangta Group stated that from the final disclosure documents it appeared that the Commission considered Article 18, and not Article 2(5) of the basic Regulation, to be the legal basis for rejecting Shuangta Group's historically used allocation method. According to Shuangta Group, Article 18 of the basic Regulation does, however, not justify the rejection of the method historically used by the company. Shuangta Group further claimed that there was no clear indication of which necessary information was missing which prevented the Commission from applying the methodology used by the company to allocate the consumption of input materials. Shuangta Group also argued that it had provided *extensive documentary evidence* concerning the transfers of ownership of yellow peas to the related company. Moreover, according to Shuangta Group, the Commission itself confirmed that it possessed all the necessary data, which could be used and that it could rely on volumes of clean pea purchased. Finally, Shuangta Group claimed that the Commission's objection was not the absence of the necessary information to disregard the allocation method used by the company, but rather the disagreement with the allocation method which has been considered to produce unreasonable results. According to Shuangta Group rejection of the allocation method falls outside the scope of Article 18.

(105) The Commission already addressed all above claims in recitals (252) to (258) of the provisional Regulation, as well as in the specific provisional disclosure document and further in the recitals (82)-(97) above and in the specific final disclosure document. Shuangta Group did not provide any novel argumentation to its claims, therefore the Commission confirmed its findings and conclusion.

(106) In particular, as explained already in recitals (83)-(87) the traceability of the ownership of the yellow pea and the clean pea obtained from it (including the price paid) was not verifiable, and consequently the corresponding value could not be verified. Since the company based their allocation key on the value of the cleaned peas, this information was considered necessary within the meaning of Article 18(1) of the basic Regulation. The Commission relied thus on the volumes of clean pea used for the production of the products that could be verified. Shuangta Group's alleged *extensive documentary evidence,* did not contain any proof confirming the transfer of ownership of the yellow pea, what was already addressed in recital (257) of the provisional Regulation and in detail in point (9) of the specific provisional disclosure document. Likewise, Shuangta Group has not provided any further evidence that would contradict these findings. The claim that they had provided extensive documentary evidence proving the transfer of the ownership of yellow pea is therefore rejected.

(107) Lastly, as already set out in recitals (257) – (258) of the provisional Regulation and in detail in point 12 of the specific provisional disclosure document, the Commission considered that the costs allocation method used by the company was based on data that could not be verified and was therefore considered unreliable. In any event, the change of the allocation method was also warranted because the method used by the company resulted in unrepresentative financial results, as explained in recital (92) and point 2 of the specific final disclosure document.

(108) Shuangta Group, in their comments to the final disclosure, also claimed that even if the Commission lawfully resorted to facts available, the Commission should have used only these facts available to fill the identified gap in the information obtained from the company and not to replace the cost allocation methodology, or specific keys used which goes beyond the scope of missing information.

(109) The Commission substituted the necessary information with data that were at its disposal, mainly supplied by the company itself (volume of clean pea, turnover) and other facts available, such as the cost allocation methodology widely used in the industry, in compliance with Article 18 of the basic Regulation. This claim was therefore rejected.

(110) For these reasons, and in the absence of any new arguments or evidence beyond those already provided in its comments on the provisional disclosure, the claims in this regard were rejected.

3.3. **Export price**

(111) In the absence of comments on the determination of the export price, the Commission confirmed its conclusions in recitals (260) and (261) of the provisional Regulation.

3.4. **Comparison**

(112) In the absence of comments on the section 3.4. on comparison, the Commission confirmed its conclusions in recitals (262) to (267) of the provisional Regulation.

3.5. **Dumping margins**

(113) Following provisional disclosure, the complainant questioned the reduction of the dumping margin as compared to the pre-disclosure within the meaning of Article 19a of the basic Regulation. In light of the Commission's findings that Shuangta's cost allocation method was not reliable, the complainant raised concerns on the downward revision of Shuangta's margin and urged the Commission to reconsider it.

(114) As set out in recital (403) of the provisional Regulation, the Commission revised Shuangta Group's dumping margin based on comments received concerning specific calculation errors following pre-disclosure that were found warranted. Since the revision of the calculation was based on the confidential data, it could not be disclosed to all interested parties. The complainant's claim was therefore rejected.

(115) Based on the above, the definitive dumping margin for Shuangta Group was revised. As a consequence, also the dumping margin applicable to all other imports originating in China (non-cooperating exporting producers) was revised, as it was set at the level of the cooperating sampled individually examined company with the highest dumping margin. On this basis, the definitive weighted average dumping margins expressed as a percentage of the cost, insurance and freight ('CIF') Union frontier price, duty unpaid, are as follows:

Company	Dumping margin (%)
Sanjia Group	40,5
Shuangta Group	67,1
Other cooperating companies	40,5
All other imports originating in the People's Republic of China	67,1

(116) In the absence of any other comments regarding the dumping margins, the remaining recitals (268) to (274) of the provisional Regulation are confirmed.

4. **INJURY**

4.1. Definition of the Union industry and Union production

(117) In the absence of comments on the determination of the relevant Union industry and Union production, the Commission confirmed its conclusions in recitals (275) and (276) of the provisional Regulation.

4.2. Union consumption

(118) CFNA claimed that it could not provide meaningful comments on the volume of imports from third countries other than China for the investigation period as the Commission has not disclosed how that volume had been calculated.

(119) The Commission fully disclosed how it had established the volume of imports from third countries other than China for all years of the period considered, including the investigation period. Recitals (278) and (280) of the provisional Regulation explained that it specifically asked the complainant to provide such data in their macro-questionnaire reply, and that the complainant used the same method used in the complaint, also for the investigation period. Tables 2 and 12 of the provisional Regulation, giving the figures for consumption and for imports from third countries, also made clear that the figure came from the verified reply to the macro-questionnaire. The open version of the reply to the macro-questionnaire, which included a section explaining the methodology, was available to interested parties in the open file.

(120) For these reasons, the Commission rejected the claim.

(121) CFNA also claimed that the Commission's determination of Union consumption, and consequently market shares, was wrong due to flaws in the determination of the volume of imports from third countries other than China. This in turn would have a direct impact on the whole injury determination.

(122) Concretely, CFNA disagreed with the Commission's decision to use the figures provided by the complainant. Regarding imports from the US, CFNA claimed that the methodology used by the complainant to select the US states where pea protein plants are allegedly located and then assume that all exports from those states to the EU under certain tariff codes consist of pea protein had not been supported by evidence. Regarding other third countries, CFNA considered that the complainant provided no supporting evidence regarding the countries with pea protein production and the reason to exclude Argentina. CFNA also claimed that if the Commission had rejected the method used in the complaint to estimate the volume of imports from China into the Union by applying the percentages derived from the 2024 US antidumping investigation on pea protein, it could not accept the same methodology to determine the imports from Canada, Australia and India.

(123) The Commission explained in recital (278) of the provisional Regulation that all the CN codes under which pea protein was classified for customs purposes in the Union included also other products so there were no available import statistics pertaining specifically to the product under investigation, a fact that CNFA itself admitted in its submissions on initiation as explained in recital (10) of the provisional Regulation, also regarding imports from the PRC.

(124) For that reason, and given that the information gathered from Member States customs authorities following the Commission's specific request for assistance was not granular enough, the Commission established the volume of imports from other third countries into the Union on the basis of the figures provided by the complainant absent any other information as explained in recital (284) of the provisional Regulation.

(125) This was in contrast to the establishment of the volume of imports from China, for which the Commission had other figures at its disposal, namely data from CFNA itself, that could be cross-checked against other information gathered in the investigation, such as sampling forms and verified information from exporting producers, as explained in recital (282) of the provisional Regulation.

(126) Throughout the investigation, and unlike the complainant, neither CFNA nor any other interested party provided any methodology to establish import volumes and prices for imports into the Union from countries other than the PRC. Nor did CFNA or any other interested party provide concrete evidence or figures that would put into question that the figures used by the Commission were the best available to establish import volumes and prices from third countries.

(127) Following definitive disclosure, CFNA reiterated the claims described in recitals (121) and (122) but did not bring new arguments or evidence other than those already provided in its comments on the provisional Regulation. It also claimed that the Commission, as investigating Authority, had failed to base its determination on positive evidence involving objective examination by relying on speculative estimates then shifting the burden to interested parties to provide a methodology to disprove them. It finally claimed that if the Commission had concluded that Chinese imports as provided by the complainant were overestimated, the same assumption should hold for third country imports.

(128) As explained in recitals (123) to (126) above, the Commission based its determination on the best available evidence for this investigation. It did so after an objective examination of all information available and having sought information from other sources such as the Member States Customs Authorities. No interested party, including CFNA, provided any evidence that could put the conclusion in recital (126) into question.

(129) For these reasons, the Commission rejected the claim.

(130) In the absence of other comments, the Commission confirmed its conclusions in recitals (277) to (286) of the provisional Regulation.

4.3. **Imports from the country concerned**

4.3.1. *Volume and market share of the imports from the country concerned*

(131) The complainant claimed that the methodology for determining the volume of imports of pea protein from China underestimated the actual volume of imports of the product concerned during the period considered. It claimed that there was a risk that the volume did not capture the imports from Chinese exporting producers that did not cooperate in the investigation and that are not represented by CFNA, or imports made through Chinese traders. In addition, it referred to several independent market and industry sources that indicate import volumes significantly higher. The complainant also stated that the low volume of Chinese imports in 2024 and the investigation period was puzzling given the imposition of anti-dumping and countervailing duties on imports of Chinese pea protein by the US and Canada in 2024, which made it highly likely that a substantial share of those volumes to North America would have been redirected to the Union.

(132) As explained in recital (282) of the provisional Regulation and recital (125) above, even though the data from CFNA might not include all imports, the Commission could cross-check them against other information gathered in the investigation, including information that was verified on-spot such as the volumes exported by the two sampled exporting producers, and found that both datasets were consistent. Therefore, such data constituted the most accurate data available for the determination of the volume of imports from China into the Union.

(133) The complainant's claim did not provide any evidence that could put into question the Commission's determination of the volume of imports from China into the Union. The complainant provided no evidence of exports from other exporting producers or Chinese traders. The claim that the volumes were higher since the imposition of anti-dumping and countervailing duties on imports of Chinese pea protein by the US and Canada in 2024 was equally unsupported by evidence, being a simple assumption.

(134) Of the three independent market and industry sources the complainant referred to, and for which the reports and evidence were made available only to the Commission for confidentiality reasons, two of them did not provide any methodology or explanation of how they arrived at the final figure nor quoted their sources. The third one explained the data used to arrive at an approximate figure but did not quote any source or provided such data. None of the three provided any information for years 2022 and 2023. Two of them provided estimates for year 2024, one differing significantly from the other, while the remaining one did not even mention the period for the estimation.

(135) For these reasons, the Commission rejected the claim.

(136) CFNA claimed that imports from China into the Union did not exhibit a sustained and significant increase in absolute terms or relative to consumption when the entire period considered is examined. According to CFNA, the 2023 increase could not, taken in isolation, be described as a significant increase with the meaning of Article 3(3) of the basic Regulation. CFNA reiterated this claim following definitive disclosure but did not bring new arguments or evidence other than those already provided in its comments on the provisional Regulation.

(137) Huel claimed that there was no significant increase in imports from China into the Union within the meaning of Article 3(3) of the basic Regulation. It noted that the volume of imports from China into the Union had been declining sharply since 2023 and explained that it was insufficient to rely solely on an end-point-to-end-point analysis and that due consideration must also be given to intervening trends. It also observed that the overall 23 % increase of Chinese imports must be juxtaposed with the increase in Union consumption of approximately 27 % over the same period.

(138) The Commission analysed the evolution of imports from China in recitals (287) to (290) of the provisional Regulation. The analysis covered the full period considered, both in terms of volume and market share and fully described the trends across the period considered. Imports of pea protein from China increased overall by 23 % in the period considered. Despite the decrease from 2023 onwards, comparing other years with 2022 would show higher increases, namely 121 % in 2023, and 77 % in 2024. Therefore, there was a significant increase of imports in absolute terms. In terms of market share, that put this increase in volumes relative to consumption, the Commission analysis made clear that the market share of Chinese imports decreased from 2022 to the investigation period, but compared to 2022, it increased by 58 % in 2023, and 32 % in 2024. For such years, there were therefore significant increases relative to consumption.

(139) Moreover, Article 3(3) of the basic Regulation provides that consideration shall be given to whether there has been a significant increase in dumped imports, either in absolute terms or relative to production or consumption in the Union, to then establish factors to be examined regarding the effect of the dumped imports on domestic prices, to then set out that no one or more of those factors can necessarily give decisive guidance. It follows that it is not necessary that imports increase both in absolute and relative terms all years of the period considered and that the determination of injury cannot be put into question based on that factor alone. For these reasons, the Commission rejected these claims.

(140) In the absence of further comments, the Commission confirmed its conclusions in recitals (287) to (290) of the provisional Regulation.

4.4. **Prices of the imports from the country concerned and price undercutting**

(141) CFNA claimed that there was an inconsistency and lack of clarity regarding the Commission's analysis of the price effect of the dumped imports. Concretely, it was not clear to CFNA whether the over 35 % undercutting margin and the over 70 % to 130 % underselling established at provisional stage related to the same comparison against actual Union sales prices, and how the two sets of figures could be reconciled given that the sampled exporters were said to represent more than 70 % of all Chinese imports and were therefore price-representative according to the Commission. CFNA requested an explanation from the Commission and claimed that in the absence of such explanation interested parties would be unable to verify the correctness of the undercutting and injury elimination calculations.

(142) The provisional Regulation, in recitals (294) and (295), made clear that the undercutting calculation compared the import prices of the Chinese sampled exporting producers to the sales prices of the sampled Union producers per product type. In recitals (296) and (297) it referred to section 6.1, which in turn explained that underselling compared the import prices of the Chinese sampled exporting producers to the non-injurious price of the sampled Union producers per product type, and that the latter was based on the cost of production of those Union producers plus target profit, not on the selling price of the Union industry.

(143) The Commission's conclusion that, given that the sampled exporting producers represented more than 70 % of all imports from China into the Union in any given year of the period considered, was not related to undercutting or the injury margin specifically but to the determination of Chinese import prices as explained in recital (291) of the provisional regulation. In any event, given that they also represented over 70 % of the volume of imports from China into the Union in the investigation period, the undercutting and injury elimination level of those two producers could be considered representative for all import prices from China.

(144) Finally, those calculations were based on verified data, at product type level, from both the sampled Union producers and the sampled exporting producers. The calculations were disclosed to those parties, and none of them claimed that they were not correct or that they could not understand them.

(145) On this basis, the Commission confirmed that there was no inconsistency or lack of clarity in the provisional Regulation.

(146) CFNA claimed that the Commission's finding of price undercutting was inconsistent with Articles 3.1 and 3.2 of the World Trade Organisation ('WTO') Anti-dumping Agreement ('ADA'), Articles 3(2) and 3(3) of the basic Regulation as well as relevant WTO Dispute Settlement Body Reports ([14]) because it was confined to the investigation period.

(147) The Commission noted that neither Articles 3.1 and 3.2 of the ADA, nor Articles 3(2) and 3(3) of the basic Regulation require an undercutting analysis at product-type level for all years of the period considered and that the findings of the WTO rulings CFNA referred to addressed different situations that were not applicable to this case. In any case, the Commission's determination was fully compliant with both rulings.

(148) In Appellate Body Report WT/DS454/AB/R China – HP-SSST (Japan/EU), the Appellate Body did not rule that undercutting at product-type level must be established for all years of the period considered. Rather, it ruled that Article 3.2 of the ADA required a dynamic assessment of price developments and trends in the relationship between the prices of the dumped imports and those of domestic like products over the duration of the period of investigation.

(149) In dispute settlement WT/DS578/R Morocco - Definitive AD measures on school exercise books, the Panel addressed a different factual situation where the price of imports was higher than the price of the domestic product in some years of the period considered and the investigating authority disregarded price trends and focussed only on a comparison between a single constructed price of the domestic product and the price of the imported product ([15]).

(150) In contrast to the situations in those disputes, and in compliance with the basic Regulation and the ADA, the Commission's undercutting analysis in the current investigation did not rely on a 'constructed price' and the Commission fully analysed price trends throughout the period considered. The Commission established undercutting for the investigation period at product-type level in recitals (294) and (295) of the provisional Regulation. The Commission also examined the trends and interactions between domestic and import prices over the period considered in recital (296) of the provisional Regulation. That examination showed that the average price of imports from China was below the selling price of the sampled Union producers throughout the period considered. Such analysis and conclusion were fully in line with the basic Regulation, the WTO ADA, and the rulings that CFNA referred to.

(151) On those grounds, the Commission rejected the claim.

([14]) Concretely, CFNA referred to the Appellate Body Reports, China – HP-SSST (Japan/EU), paras. 5.160-5.161 (https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/WT/DS/454ABR.pdf&Open=True). and Panel Report, Morocco – Definitive AD Measures on Exercise Books (Tunisia), paras. 7.217 and 7.222. (https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/WT/DS/578R.pdf&Open=True).

([15]) Panel Report, Morocco – Definitive AD Measures on Exercise Books (Tunisia), paras. 7.214 and 7.220 (https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/WT/DS/578R.pdf&Open=True).

(152) CFNA claimed that the Commission had failed to sufficiently demonstrate price depression or suppression in the sense of Article 3(3) of the basic Regulation and Article 3.2 of the ADA. Concretely, it claimed that the Commission inferred price depression and suppression from the analysis of import prices, domestic prices, and the cost of production of the Union industry and did not answer key questions as by how much prices were allegedly lowered or kept from increasing because of Chinese import prices and whether and to what extent Union prices moved in line with Union costs, rather than Chinese import prices. CFNA also claimed that the Commission did not establish, on the basis of positive evidence, significant price undercutting, price depression or price suppression caused by Chinese imports over the entire period considered.

(153) In support of this claim, CFNA argued that the movement of Union prices over the period considered was driven primarily by production costs and Union consumption, not by Chinese import prices. According to CFNA, this was confirmed because the Union's sales prices followed patterns similar to the Union's cost of production and Union consumption.

(154) First, the Commission noted that neither Article 3.2 of the ADA nor 3(3) of the basic Regulation require a quantification of price depression or suppression.

(155) Second, the Commission's findings on undercutting, price depression and suppression were based on positive evidence, namely on data from both the sampled Union producers and the sampled exporting producers, for all years of the period considered and at product-type level for the investigation period, that were verified on-spot. The weighted average undercutting margin found by the Commission was over 35 % and the injury elimination levels were from 70 % to 130 %, while the average price of imports from China into the Union was significantly below the sales price and cost of production of the Union industry. No interested party challenged these data. CFNA's claim that no 'significant' price undercutting, price depression or suppression was established was clearly wrong given the findings of the investigation.

(156) Finally, as explained in section 4 on injury and section 5 on causation of the provisional Regulation, the investigation established that Chinese imports were significant in terms of volume throughout the period considered, that the average price of imports from China was below both the selling price and the cost of production of the sampled Union producers throughout the period considered, that Union prices and the profitability of the Union industry in the Union market decreased in the period considered, and that imports from other third countries were of a much smaller magnitude than Chinese imports and made at significantly higher prices than imports from China. Neither CFNA nor any other interested party have provided any evidence that the Commission's determination of those indicators was wrong, or of any factor other than the dumped imports from China that would have forced the Union industry to lower its prices below its cost of production.

(157) CFNA's claim that the movement of Union prices over the period considered was driven primarily by production costs and Union consumption and not by Chinese import prices was baseless. If the Union prices were driven primarily by the Union industry's production costs, then the Union industry would have set prices higher than these costs allowing for viable profitability.

(158) It follows that it was the imports from China that depressed the Union industry's prices in the Union market and prevented price increases that would otherwise have occurred; indeed, absent the dumped imports, no other factor could have prevented the Union industry from increasing their prices to profitable levels. Therefore, the investigation positively established that it was the price level of the dumped imports from China that caused price depression and suppression.

(159) On this basis, the Commission rejected the claims.

(160) In the absence of further comments, the Commission confirmed its conclusions in recitals (291) to (297) of the provisional Regulation.

4.5. **Economic situation of the Union industry**

(161) No interested party challenged the indicators established by the Commission in the provisional Regulation as such. The claims on the volume of imports from third countries from CFNA and on the volume of imports from China from the complainant, that could put into question the establishment of market shares, were rejected above in recitals (123) to (125) and (132) and (133) respectively. Therefore, the Commission confirmed recitals (298) to (328) of the provisional Regulation.

4.6. **Conclusion on injury**

(162) CFNA and Huel claimed that a stable production capacity did not in itself demonstrate material injury.

(163) CFNA claimed that the figures on employment and productivity cannot be read as a proof of injury but rather to a situation where Union producers are maintaining their workforce in anticipation of future growth in a still-expanding market. Huel claimed that an industry that is expanding its workforce, in a period of contracting demand, cannot be characterised as suffering material injury.

(164) CFNA disagreed with the Commission's conclusion that the Union industry is suffering material injury because, taking into account that Union consumption increased by 27 % throughout the period considered, the sales volume of the Union industry increased on a yearly basis and the Union industry lost only 3 % of market share over the period considered, coinciding with the increase in market share of third countries other than China. Huel explained that according to the General Court in *Hubei Xinyegang Steel Co. Ltd* ([16]), the limited decrease in market share experienced by the Union industry is insufficient to demonstrate that the Union industry was in a vulnerable situation at the end of the investigation period.

(165) CFNA claimed that the Commission did not assess the impact of labour costs on the Union industry's situation and prices.

(166) CFNA noted that the improvement of the net cash flow throughout the period considered was not an indicator of an industry suffering material injury. Huel indicated that this demonstrates that this will allow the Union industry to increase its future investments.

(167) Following definitive disclosure, CFNA claimed that the Commission had placed excessive weight on negative indicators while dismissing or downplaying positive indicators that contradicted its finding of material injury. Concretely, CFNA pointed again to the increase in volume of Union sales, the market shares of the Union industry throughout the period considered despite their decrease, the stability of production capacity and employment, the evolution of productivity and the improvement of cash flow. It claimed that these positive indicators examined together would reveal a situation where the industry, despite facing competition, remained sound and fundamentally healthy throughout the period considered.

(168) In line with Article 3 of the basic Regulation, the Commission's conclusion on injury in recital (332) of the provisional Regulation was based on an evaluation of all relevant economic factors and indices having a bearing on the state of the industry, with not one or more of those factors necessarily giving decisive guidance. On that basis, the Commission concluded that the Union industry suffered material injury both in terms of volume and financially for the reasons explained in recitals (329) to (331) of the provisional Regulation. None of the claims on the provisional Regulation or following definitive disclosure could put into question these findings and, hence, the Commission's conclusion on injury. These recitals of the provisional Regulation clearly showed that the Commission did not conclude that the Union industry was suffering material injury only because it lost 3 % market share, that such decrease in itself was sufficient to demonstrate material injury, or that labour costs or a stable production capacity or the evolution of cash flow, employment or productivity, on their own, demonstrated or not material injury. The assessment carried out by the Commission of all the relevant economic factors clearly showed

([16]) Case T-528/09 *Hubei Xinyegang Steel Co. Ltd v Council of the European Union* [2014] ECLI:EU:T:2014:35, para 61, available at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62009TJ0528.

an industry losing market shares on its growing domestic market, despite the increase in sales in terms of volume, and significantly decreasing its sales price and becoming loss making. Those findings showed a clearly injurious picture. While the Commission's analysis was based on an evaluation of all relevant economic factors and indices having a bearing on the state of the industry, the claims of CFNA and Huel ignored key facts for the injury determination like the decrease of prices and the profitability of the Union industry.

(169) For these reasons, the Commission rejected these claims.

(170) Huel claimed that the provisional Regulation misrepresented the evolution of Union consumption during the period considered because, after the initial growth, Union consumption has been declining. Huel claimed that, even with respect to the initial period of growth, the Commission did not adequately examine the reasons why the Union industry allegedly did not fully capture the growth as it failed to take into consideration certain factors that, however, Huel only provided to the Commission on a confidential basis.

(171) Recitals (285) and (286) of the provisional Regulation provided the evolution of consumption across the period considered, without any misrepresentation. Regarding the reasons why the Union industry did not fully capture the growth, as explained in recital (329) of the provisional Regulation, the investigation established that in the period considered, despite an increase of 27 % in demand, the Union industry experienced a decrease in production and production capacity, its employment and capacity remained constant, and its sales in the Union market increased but at a slower pace than consumption. Consequently, the market share of the Union industry decreased from 59 % in 2022 to 56 % in the investigation period. No interested party provided any evidence challenging these figures, that were the grounds on which the Commission concluded that the Union industry was not able to fully benefit from the growing consumption.

(172) Regarding the factors brought forward by Huel that would explain why the Union industry lost sales and market shares, Huel did not furnish a non-confidential summary of that information at all as required by Article 19(2) of the basic Regulation. Therefore, the Commission disregarded it.

(173) For these reasons, the Commission rejected the claim.

(174) In the absence of further comments, the Commission confirmed its conclusions in recitals (329) to (332) of the provisional Regulation.

5. **CAUSATION**

5.1. **Effects of the dumped imports**

(175) CFNA and Huel claimed that in the provisional Regulation the Commission's analysis essentially rested on a simple reiteration of worsening Union indicators and the presence of Chinese imports, without establishing that Chinese imports constitute the explanatory force behind those negative developments. They claimed that imports from China did not show a sustained and significant increase and did not gain market share at the expense of the Union industry and that the small loss of market share by the Union industry coincides with an increase in the market share of imports from countries other than China. They also claimed that the negative trends in some indicators persisted or even deepened when Chinese import volumes and market shares were declining or when the Union industry's export performance deteriorated, and that some of them were already low before Chinese imports began to increase.

(176) CFNA claimed that the Union sales prices were not related to Chinese import prices, but rather to production costs and Union consumption. CFNA further claimed that the Commission did not provide a separate assessment of factors affecting prices as required by Article 3(5) of the basic Regulation.

(177) Huel indicated that the decline in sales prices of the Union pea protein from 2023 onwards is consistent with the corresponding reduction in costs over the same period.

(178) CFNA claimed that the deterioration of the Union industry's profit margin in the investigation period could not be attributed to Chinese imports as there was no correlation between the fluctuation of the profitability and the volume of imports. CFNA and Huel both claimed that the Union industry's profit margin was already low before Chinese imports increased in 2023 and that the decline of the profit margin was caused by the deterioration of the export performance combined with a sharp increase in production costs.

(179) Following definitive disclosure, CFNA reiterated the claims described in recitals (175) to (178) but did not bring new arguments or evidence other than those already provided in its comments on the provisional Regulation. It simply stated again that, in terms of volume, if Chinese imports were the explanatory force behind the injury, they should have gained lasting market share at the expense of the Union industry and that, in terms of prices, there was no stable negative correlation between Chinese prices and Union prices that would suggest that Chinese imports prevented Union price increases.

(180) CFNA also claimed that the Commission did not establish, on the basis of positive evidence, significant price undercutting, price depression or price suppression caused by Chinese imports over the entire period considered.

(181) The claims on undercutting, price depression and suppression were rejected in recitals (154) to (159).

(182) The same recitals, as well as recital (337) of the provisional Regulation, explain the reasons why, given the facts, the Commission considered that the only explanatory force for the deterioration of the financial situation of the Union industry, including the decline of Union's prices in the Union market to levels below their cost of production and the consequent evolution of their profitability from already low levels at the beginning of the period considered to losses from 2023 onwards, was the price pressure from the dumped imports. No interested party provided evidence of any other factor that could have forced the Union industry to decrease their prices to such levels.

(183) Regarding the claim that some indicators showed negative developments when Chinese import volumes and market shares were declining or when the export performance of the Union industry deteriorated and that some of them were already low before Chinese imports began to increase, the Commission explained in recital (338) of the provisional regulation that the significant share of imports from the People's Republic of China at low, dumped prices caused injury to the Union industry in all years of the period considered. Regarding the export performance of the Union industry, the Commission concluded in recital (348) of the provisional Regulation that it contributed to the injury suffered by the Union industry but did not attenuate the causal link between the material injury suffered by the Union industry and the dumped Chinese imports. These imports gained market share in the Union at the expense of the Union industry at the beginning of the period considered and forced the Union industry to lower its prices in the Union throughout the period considered, leading it to a loss-making situation. Such conclusions were fully grounded on the evidence gathered in the investigation.

(184) Concretely, in each year of the period considered, Chinese dumped imports were significant in terms of volume, the average price at which they entered the Union was below both the selling price and the cost of production of the sampled Union producers, and imports from other third countries were of a much smaller magnitude than Chinese imports and made at significantly higher prices than imports from China.

(185) Consequently, the dumped imports from China were the explanatory force for the loss of market share of the Union industry from 2022 to 2024 and for its unsustainable financial situation in the Union market, that deteriorated in the period considered. Absent the dumped imports at such prices, there would have been no reason for the Union industry to lose sales or sell at a low profitability or at a loss in the Union market. Neither CFNA nor Huel provided any evidence showing otherwise.

(186) Regarding the evolution of the market shares of imports from China and the Union industry, the investigation established that the Union industry recovered some of its market share in the investigation period, but it also established that from 2022 to 2024 the volume of imports from China into the Union increased by 77 %, significantly outpacing both the 34 % increase in consumption and the 13 % increase of Union sales in the same period. The gains in market share by the dumped Chinese imports were at the expense of the Union industry. Indeed, from 2022 to 2023 the increase in market share of China from 30,5 % to 48,3 % was mirrored by a decrease in the market share of the Union industry from 58,5 % to 43,8 %, and a similar pattern took place from 2023 to 2024, where the market share of China decreased but still remained 10 percentage points higher than in 2022.

(187) Moreover, the Commission's conclusion on the effect of dumped imports was not based on volume effects in isolation, but on volume and price effects and the relation between both. The parallel reverse evolution of the market shares of China and the Union industry in the Union market in fact reinforced the conclusion that the dumped imports were the only explanatory force for the injury suffered by the Union industry. Due to the dumped imports from China the Union industry could not make viable profits throughout the period considered and, to avoid further losing market share, had to decrease its prices below its cost of production and sell at a loss from 2023 until the end of the investigation period.

(188) For these reasons, the Commission rejected these claims.

(189) CFNA claimed that the drop in investments occurred mainly between 2022 and 2023, at a time when Chinese imports were increasing but when the Union industry also faced exceptional cost increase and a sharp decline in exports. The fall continued from 2023 to the investigation period even though Chinese import volumes and market shares were decreasing, suggesting that investment decisions were driven primarily by internal financial constraints and risk assessments, not by Chinese imports. CFNA claimed that the return on investments was already negative at the start of the period considered, showing a long-standing structural problem of the Union industry rather than a new phenomenon caused by Chinese imports. CFNA also claimed that the mixed picture of the Union industry regarding the ability to raise capital shows that the difficulties stem mainly from the historical financial position and business strategies of individual companies.

(190) All these claims were not backed by any evidence. For these reasons, the Commission rejected them.

(191) In the absence of further comments, the Commission confirmed its conclusions in recitals (334) to (338) of the provisional Regulation.

5.2. **Effects of other factors**

5.2.1. *Imports from third countries*

(192) CFNA and Huel disagreed with the Commission's conclusion that imports from other countries did not contribute to the injury suffered by the Union industry because they were lower in volume than the imports from China. They claimed that the overall loss of Union industry market share is matched by the overall gain of imports from countries other than China. Huel specifically pointed at the imports from the US as the main reason of the Union industry's market share loss.

(193) Those claims were based on an end-point to end-point analysis, putting all the weight on the fact that in the period considered the market share of the Union industry decreased from 59 % to 56 % while that of third countries other than China increased from 11 % to 14 %. Such claim ignored the evolution of the imports from third countries across the years, their quantities and prices, and did not put such factors in relation to others. This in contrast to the Commission's analysis in recitals (341) to (343) of the provisional Regulation, that showed that the imports from third countries were of much less magnitude in terms of volume than Chinese imports and were made at prices that could not have caused injury to the Union industry. This would also apply to imports from the US seen on their own. For these reasons, the Commission rejected the claim.

(194) In the absence of further comments, the Commission confirmed its conclusions in recitals (339) to (343) of the provisional Regulation.

5.2.2. *Export performance of the Union industry*

(195) CFNA and Huel claimed that the Commission did not attribute sufficient weight to the export performance of the Union industry as a cause of injury. CFNA considered that the Commission failed to conduct a separate and objective analysis of that contribution and Huel indicated that the Commission did not explain why the negative implications of the drop in exports by the Union industry are insufficient to attenuate the causal link. CFNA argued that the fall in exports in 2023 is a major driver of lower production, lower capacity utilisation, higher inventories and weaker profitability.

(196) CFNA also claimed, more broadly, that the decrease in production of the Union industry cannot be attributed to Chinese imports due to the sharp increase in production costs, the significant drop in exports and the unexplained closure of one production site between 2022 and 2023 and because imports from China into the Union declined between 2023 and the investigation period.

(197) The Commission acknowledged that the export performance of the Union industry contributed to the injury suffered by the Union industry. However, on the basis of the elements on file, the Commission found that it did not attenuate the causal link between the injury and the dumped imports from China as explained in recital (348) of the provisional Regulation.

(198) The provisional Regulation showed that the decrease of production or the increase of stocks could not be attributed to export performance alone. Indeed, as evidenced by Tables 3, 5 and 10 of the provisional Regulation, the biggest decrease in production (-17 %) and biggest increase of stocks (+19 %) took place from 2022 to 2023, the year in which Chinese imports registered the biggest increase (+121 %). After 2023, Chinese imports declined year-on-year, although they remained at levels that were always significant and above those of 2022 in terms of volume, and the Union industry's level of production and stocks remained at similar levels as those of 2023. The correlation between the level of imports and the production and stocks of the Union industry was clear throughout the period considered. Therefore, Chinese imports were also a cause for such developments, including the closure of one production site between 2022 and 2023, a consequence of declining production rather than a cause. CFNA did not provide any evidence proving otherwise, it merely claimed in general that the export performance was a major driver for such developments.

(199) Also, the injurious financial situation of the Union industry was due to the price effects of the dumped imports in the Union market, which were unrelated to the export performance. For the reasons explained in recitals (156), (158) and (184) above, Chinese imports were the only reason why the Union industry had to sell pea protein at a low profitability or at a loss in the Union market.

(200) Following definitive disclosure, CFNA reiterated the claims described in recitals (195) and (196) but did not bring new arguments or evidence other than those already provided in its comments on the provisional Regulation. CFNA also claimed that the Commission's conclusion in recital (199) is unsupported by evidence and that the Commission failed to explain how it reconciled this finding with its acknowledgment that export performance contributed to the injury.

(201) The conclusion in recital (199) was fully grounded on the data gathered in the investigation regarding the financial situation of the Union industry only in the Union market, based on verified data, such as its sales prices and profitability only in the Union market, that did not relate to the performance of the Union industry in its export markets.

(202) For these reasons, the Commission rejected these claims.

(203) In the absence of further comments, the Commission confirmed its conclusions in recitals (344) to (348) of the provisional Regulation.

5.2.3. *Evolution of consumption*

(204) In the absence of further comments, the Commission confirmed its conclusions in recital (349) of the provisional Regulation.

5.2.4. *Evolution of the cost of production due to increases in raw material and energy costs.*

(205) CFNA and Huel disagreed with the conclusion that the increases in the cost of energy and peas could not have contributed to the material injury suffered by the Union industry. They claimed that the Commission did not separate and distinguish the injurious effects of these factors from any alleged effects of dumped imports from China. CFNA also claimed that the Commission's assertion that absent the significant price pressure from dumped imports throughout the period considered, the Union industry could have passed these cost increases to their customers, was speculative and not based on positive evidence.

(206) Following definitive disclosure, CFNA reiterated the claim described in recital (205) but did not bring new arguments or evidence other than those already provided in its comments on the provisional Regulation.

(207) The claim regarding increases in the cost of energy and peas had already been brought at initiation by CFNA and was addressed in recitals (350) to (352) of the provisional Regulation. Neither Huel not CNFA provided any new evidence that would change the conclusion in those recitals. Also, for the reasons explained in recitals (156), (158) and (184) above, Chinese imports were the only reason why the Union industry had to sell pea protein at a low profitability or at a loss in the Union market. Indeed, no interested party has provided any evidence of a factor other than the Chinese imports that would have prevented the Union industry to pass these cost increases to their customers. On these grounds, the Commission rejected the claim.

(208) In the absence of further comments, the Commission confirmed its conclusions in recitals (350) to (352) of the provisional Regulation.

5.2.5. *Other factors*

(209) Huel claimed that the losses of the Union industry are attributable to its structural lack of competitiveness as well as the factors that Huel only provided in confidentiality to the Commission as explained in recital (170) above, rather than to the impact of the imports from China and that such lack of competitiveness of the Union industry was one of the known factors that the Commission is required to assess pursuant to Article 3(7) of the basic Regulation.

(210) The claim on lack of competitiveness was a mere assertion of a general nature not backed by any evidence. As regards the other factors, shared only with the Commission and not put on the open file, the claim based on them was already rejected for the reasons outlined in recitals (171) and (172) above. On these grounds, the Commission rejected the claims.

5.3. **Conclusion on causation**

(211) Following definitive disclosure, CFNA referred to the Commission's own findings in the investigation on Soy Protein from China ([17]). CFNA claimed that the Commission terminated that proceeding after finding that an increase in the cost of the main raw material, alongside an 8 % decrease in demand, was enough to break the causal link, while in the present investigation the cost increases were even more dramatic, and while demand grew, the Union industry faced a simultaneous collapse in its export market. According to CFNA, the Commission should draw the same conclusions in this case, namely that cost increases and other factors, rather than dumped imports, were the cause of the Union industry's difficulties.

([17]) Commission Decision (2012/343/EU) of 27 June 2012 terminating the anti-dumping proceeding concerning imports of certain concentrated soy protein products originating in the People's Republic of China (OJ L 168, 28.6.2012, p. 38. ELI: http://data.europa.eu/eli/dec/2012/343/oj).

(212) The Commission first noted that each case must be assessed on its own merits. Nevertheless, the facts established in the investigation on soy protein were different to those established in the current investigation. In the soy protein investigation, the situation of the Union industry was not one of material injury, while a contraction in demand and the volatility of the soy bean market were found as factors creating injury ([18]). By contrast, the current investigation established material injury, and neither demand in the Union market, which increased by 27 %, nor the cost of production of the Union industry, that despite fluctuations overall decreased as explained in recitals (350) to (352) of the provisional regulation, were found to have caused any injury. The export performance of the Union industry was analysed in section 5.2.2.

(213) In the absence of further comments on causation, the Commission confirmed its conclusions in recitals (353) to (355) of the provisional Regulation.

6. **LEVEL OF MEASURES**

(214) The complainant claimed that the Commission should evaluate whether the lesser duty rule should be removed because of raw material distortions affecting the product concerned.

(215) As the margins adequate to remove injury are higher than the dumping margins, the Commission did not need to address this claim.

(216) The complainant also stated that the level of the dumping duties had been set in the provisional Regulation at a level significantly below the injury margin, warning that the duties may therefore be insufficient to fully remove the injurious effects caused by the dumped imports.

(217) In line with Article 7(2) of the basic Regulation, the amount of the provisional anti-dumping duty shall not exceed the margin of dumping as provisionally established. Likewise, Article 9(4) of the basic Regulation sets out that the amount of the anti-dumping duty shall not exceed the margin of dumping established. This claim was therefore rejected.

(218) In the absence of further comments, the Commission confirmed its conclusions in recitals (356) and (357) of the provisional Regulation.

6.1. **Injury margin**

(219) In the absence of comments, the Commission confirmed its conclusions in recitals (358) to (370) of the provisional Regulation.

(220) Following the changes to the dumping margins explained in recitals (113) to (116) above, the definitive dumping and injury margins are as follows:

Country	Company	Dumping margin (%)	Injury margin (%)
People’s Republic of China	Sanjia Group	40,5	81,9
	Shuangta Group	67,1	130,8
	Other cooperating companies	40,5	81,9
	All other imports originating in the People’s Republic of China	67,1	130,8

([18]) Commission Decision (2012/343/EU), recitals (139) and (147) to (167).

6.2. Conclusion on the level of measures

(221) Following the above assessment, definitive anti-dumping duties should be set as below in accordance with Article 9(4) of the basic Regulation:

Country	Company	Definitive anti-dumping duty
People's Republic of China	Sanjia Group	40,5 %
	Shuangta Group	67,1 %
	Other cooperating companies	40,5 %
	All other imports originating in the People's Republic of China	67,1 %

7. UNION INTEREST

7.1. Interest of the Union industry

(222) In the absence of comments, the Commission confirmed its conclusions in recitals (373) to (377) of the provisional Regulation.

7.2. Interest of upstream suppliers

(223) On 2 July 2026, the French Federation of Oilseed and Protein Crop Producers ('FOP') registered as an interested party and supported the imposition of definitive antidumping duties on imports of pea protein from China. FOP claimed that the increasing volume of dumped imports of pea protein from China has negatively affected the entire pea protein value chain in the Union by exerting downward pressure on crop prices and undermining the profitability of farmers. FOP also claimed that the development of European crop production is essential to ensure a fair income for producers, support the EU's environmental objectives, secure the supply of local, traceable and high-quality raw materials to downstream value chains, and reduce the Union's dependence on protein imports.

(224) In the absence of further comments, the Commission confirmed its conclusions in recitals (378) to (380) of the provisional Regulation.

7.3. Interest of unrelated importers

(225) Following the pre-disclosure of provisional findings pursuant to Article 19a of the basic Regulation, an unrelated importer of the product under investigation registered as interested party. The company indicated its willingness to submit data to the Commission and was consequently invited to complete the relevant questionnaire. However, no response was received.

(226) In the absence of comments, the Commission confirmed its conclusions in recitals (381) to (384) of the provisional Regulation.

7.4. Interest of users and consumers

(227) As mentioned in recital (7), Huel submitted a reply to the questionnaire for users of the product under investigation on 13 May 2026. Despite this being late in the proceeding, the Commission analysed the questionnaire reply and requested additional information.

(228) According to the information provided, Huel uses pea protein as a raw material to produce some of its products. In the investigation period, pea protein accounted for [1-4] % of the total cost of production of these products, which in turn generated [15-25] % of total company turnover. Therefore, the impact of the anti-dumping duties would be very limited on this user as pea protein did not make up for a significant share of their costs.

(229) On 13 July 2026, KremsChem Austria GmbH, a user of pea protein, registered as interested party in the investigation and expressed opposition to the measures, explaining the reasons only to the Commission within its interested party status request and without providing a non-confidential version. On 7 August 2026, the company requested an exemption from the anti-dumping duties for pea protein isolates from China used in industrial research and bio-based resin production, alleging that there was no technically equivalent alternative in the Union or elsewhere. The company did not provide any evidence to back its claim and all its submissions were received after the statutory deadlines. On this basis, the Commission dismissed its comments.

(230) In the absence of further comments, the Commission confirmed its conclusions in recitals (385) to (388) of the provisional Regulation that users would not be disproportionally affected by the imposition of the measures.

7.5. **Conclusion on Union interest**

(231) The complainant supported the Commission's conclusion that the imposition of measures was in the Union interest. It expressed its views that robust anti-dumping measures are necessary to preserve a resilient and diversified supply base within the Union.

(232) CFNA claimed that the conclusions in the provisional Regulation, in light of the absence of cooperation from importers or users, were not based on positive evidence and did not amount to a genuine balancing of interest as required by Article 21 of the basic Regulation, not being possible to clearly conclude that the overall effect of the measures would be positive for the Union economy as a whole. CFNA noted that imposing high anti-dumping duties on a widely used upstream ingredient would necessarily increase costs and/or reduce margins in the downstream value chain, even if the impact per consumer basket would be small in absolute terms. Huel considered that the interest of users and consumers weighed strongly against the imposition of definitive anti-dumping measures also for the same reasons only provided in confidentiality to the Commission as explained in recital (170).

(233) As mentioned in recitals (381) and (385) of the provisional Regulation, users and importers did not cooperate with the investigation at provisional stage. In the definitive stage of the investigation, only one user submitted information. On that basis the Commission concluded that users would not be disproportionally affected by the imposition of the measures as explained in recitals (227) to (230). It follows that the conclusion that the investigation did not reveal that measures would have disproportionate negative effects on importers and users, while it would be in the interest of suppliers and certainly of the Union industry, remained valid. Neither CFNA nor Huel provided any evidence that would put such conclusions into question. Regarding the reasons Huel provided confidentially, the same reasons to reject those in injury and causation, outlined in recitals (171) and (172), applied to Union interest. On this basis, the Commission rejected the claims.

(234) In the absence of further comments, the Commission confirmed its conclusions in recitals (389) to (391) of the provisional Regulation.

8. **DEFINITIVE ANTI-DUMPING MEASURES**

8.1. **Definitive measures**

(235) In view of the conclusions reached with regard to dumping, injury, causation, level of measures and Union interest, and in accordance with Article 9(4) of the basic Regulation, definitive anti-dumping measures should be imposed in order to prevent further injury being caused to the Union industry by the dumped imports of the product concerned.

(236) On the basis of the above, the definitive anti-dumping duty rates, expressed on the CIF Union border price, customs duty unpaid, should be as follows:

Country	Company	Dumping margin (%)	Injury margin (%)	Definitive anti-dumping duty (%)
People's Republic of China	Sanjia Group	40,5	81,9	40,5
	Shuangta Group	67,1	130,8	67,1
	Other cooperating companies	40,5	81,9	40,5
	All other imports originating in the People's Republic of China	67,1	130,8	67,1

(237) The individual company anti-dumping duty rates specified in this Regulation were established on the basis of the findings of this investigation. Therefore, they reflect the situation found during this investigation in respect to these companies. These duty rates are thus exclusively applicable to imports of the product under investigation originating in the country concerned and produced by the named legal entities. Imports of the product concerned manufactured by any other company not specifically mentioned in the operative part of this Regulation, including entities related to those specifically mentioned, cannot benefit from these rates and should be subject to the duty rate applicable to 'all other imports originating in the People's Republic of China'.

(238) A company may request the application of these individual anti-dumping duty rates if it changes subsequently the name of its entity. The request must be addressed to the Commission ([19]). The request must contain all the relevant information enabling to demonstrate that the change does not affect the right of the company to benefit from the duty rate which applies to it. If the change of name of the company does not affect its right to benefit from the duty rate which applies to it, a regulation about the change of name will be published in the *Official Journal of the European Union*.

(239) To minimise the risks of circumvention due to the difference in duty rates, special measures are needed to ensure the proper application of the individual anti-dumping duties. The application of individual anti-dumping duties is only applicable upon presentation of a valid commercial invoice to the customs authorities of the Member States. The invoice must conform to the requirements set out in Article 1(3) of this Regulation. Until such invoice is presented, imports should be subject to the anti-dumping duty applicable to 'all other imports originating in the People's Republic of China'.

(240) While presentation of this invoice is necessary for the customs authorities of the Member States to apply the individual rates of anti-dumping duty to imports, it is not the only element to be taken into account by the customs authorities. Indeed, even if presented with an invoice meeting all the requirements set out in Article 1(3) of this Regulation, the customs authorities of Member States should carry out their usual checks and may, like in all other cases, require additional documents (shipping documents, etc.) for the purpose of verifying the accuracy of the particulars contained in the declaration and ensure that the subsequent application of the rate of duty is justified, in compliance with customs law.

(241) Should the exports by one of the companies benefiting from lower individual duty rates increase significantly in volume, in particular after the imposition of the measures concerned, such an increase in volume could be considered as constituting in itself a change in the pattern of trade due to the imposition of measures within the meaning of Article 13(1) of the basic Regulation. In such circumstances, an anti-circumvention investigation may be initiated, provided that the conditions for doing so are met. This investigation may, *inter alia*, examine the need for the removal of individual duty rate(s) and the consequent imposition of a country-wide duty.

([19]) Email: TRADE-TDI-REQUESTS@ec.europa.eu, European Commission, Directorate-General for Trade and Economic Security, Directorate G, Rue de la Loi/Wetstraat 170, 1040 Bruxelles/Brussel, BELGIQUE/BELGIË. Mention the number of this regulation and the case number (AD737) in the request.

(242) To ensure a proper enforcement of the anti-dumping duties, the anti-dumping duty for all other imports originating in the People's Republic of China should apply not only to the non-cooperating exporting producers in this investigation, but also to the producers which did not have exports to the Union during the investigation period.

(243) Exporting producers that did not export the product concerned to the Union during the investigation period should be able to request the Commission to be made subject to the anti-dumping duty rate for cooperating companies not included in the sample. The Commission should grant such request provided that three conditions are met. The new exporting producer would have to demonstrate that: (i) it did not export the product concerned to the Union during the IP; (ii) it is not related to an exporting producer that did so; and (iii) has exported the product concerned thereafter or has entered into an irrevocable contractual obligation to do so in substantial quantities.

8.2. **Definitive collection of the provisional duties**

(244) In view of the dumping margins found and given the level of the injury caused to the Union industry, the amounts secured by way of provisional anti-dumping duties imposed by the provisional Regulation, should be definitively collected up to the levels established under the present Regulation.

8.3. **Retroactive collection**

(245) As mentioned in section 1.2. above, the Commission made imports of the product concerned subject to registration.

(246) During the definitive stage of the investigation, the Commission analysed the data collected in the context of the registration to determine whether the criteria under Article 10(4) of the basic Regulation were met for the retroactive collection of definitive duties.

(247) The Commission's analysis showed no further substantial rise in imports in addition to the level of imports which caused injury during the investigation period, as prescribed by Article 10(4)(d) of the basic Regulation. The monthly average import volume of the product concerned during the investigation period was 954 tonnes, while the monthly average import volume during the period from the month following the initiation of this investigation until the last full month preceding the imposition of provisional measures (September 2025 – March 2026) was 826 tonnes ([20]).The monthly average import volume during the period from the month following the initiation of this investigation up to and including the month in which provisional measures were imposed (September 2025 – April 2026) was 795 tonnes ([21]). Therefore, the Commission concluded that the conditions for retroactive collection of definitive duties were not met.

9. **FINAL PROVISION**

(248) In view of Article 109 of Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council ([22]), when an amount is to be reimbursed following a judgment of the Court of Justice of the European Union, the interest to be paid should be the rate applied by the European Central Bank to its principal refinancing operations, as published in the C series of the *Official Journal of the European Union* on the first calendar day of each month.

(249) The measures provided for in this regulation are in accordance with the opinion of the Committee established by Article 15(1) of the basic Regulation,

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([20]) Source: 14(6) database.
([21]) Source: 14(6) database.
([22]) Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (OJ L, 2024/2509, 26.9.2024, ELI: http://data.europa.eu/eli/reg/2024/2509/oj).

HAS ADOPTED THIS REGULATION:

Article 1

1. A definitive anti-dumping duty is imposed on imports of high protein content pea protein, which contains more than 65 percent protein on a dry weight basis, encompassing all types of pea protein derived from peas (including, but not limited to, yellow field peas and green field peas), in all physical forms (including solid (e.g. powder) and liquid (solution) forms), whether textured or not, currently falling under the following CN and TARIC codes and the TARIC additional codes listed in paragraph 2 and in the Annex to this Regulation:

ex 3504 00 90 (TARIC code 3504 00 90 91),

ex 2106 10 20 (TARIC code 2106 10 20 40),

ex 2106 10 80 (TARIC codes 2106 10 80 31, 2106 10 80 39 and 2106 10 80 71),

ex 2106 90 92 (TARIC code 2106 90 92 75),

ex 2303 10 90 (TARIC code 2303 10 90 10),

ex 2309 10 11, ex 2309 10 13, ex 2309 10 15, ex 2309 10 19, ex 2309 10 31, ex 2309 10 33, ex 2309 10 39, ex 2309 10 51, ex 2309 10 53, ex 2309 10 59, ex 2309 10 70, ex 2309 10 90, ex 2309 90 10, and ex 2309 90 20,

ex 2309 90 31 (TARIC codes 2309 90 31 12, 2309 90 31 14, 2309 90 31 17, 2309 90 31 19, 2309 90 31 30, 2309 90 31 81 and 2309 90 31 91),

ex 2309 90 33, ex 2309 90 35, ex 2309 90 39, ex 2309 90 41, ex 2309 90 43, ex 2309 90 49, ex 2309 90 51, ex 2309 90 53, ex 2309 90 59, ex 2309 90 70, and ex 2309 90 91,

ex 2309 90 96 (TARIC codes 2309 90 96 31, 2309 90 96 39, 2309 90 96 91 and 2309 90 96 95) and originating in the People's Republic of China.

2. The rates of the definitive anti-dumping duty applicable to the net, free-at-Union-frontier price, before duty, of the products described in paragraph 1 and produced by the companies listed below, shall be as follows:

Country of origin	Company	Definitive anti-dumping duty	TARIC additional code
People's Republic of China	Sanjia Group: — Jiujiang Tiantai Food Co., Ltd. — Yantai Oriental Protein Tech Co., Ltd	40,5 %	88BQ
	Yantai Shuangta Food Co. Ltd.	67,1 %	88BR
	Other cooperating companies listed in Annex	40,5 %	See Annex
	All other imports originating in the People's Republic of China	67,1 %	88ZZ

3. The application of the individual duty rates specified for the companies mentioned in paragraph 2 shall be conditional upon presentation to the Member States' customs authorities of a valid commercial invoice, on which shall appear a declaration dated and signed by an official of the entity issuing such invoice, identified by his/her name and function, drafted as follows: '*I, the undersigned, certify that the (volume in tonnes) of pea protein sold for export to the European Union covered by this invoice was manufactured by (company name and address) (TARIC additional code) in the People's Republic of China. I declare that the information provided in this invoice is complete and correct.*' Until such invoice is presented, the duty applicable to all other imports originating in the People's Republic of China shall apply.

4. Unless otherwise specified, the provisions in force concerning customs duties shall apply.

Article 2

The amounts secured by way of the provisional anti-dumping duty under Implementing Regulation (EU) 2026/916 imposing a provisional anti-dumping duty on imports of pea protein originating in the People's Republic of China shall be definitively collected. The amounts secured in excess of the definitive rates of the anti-dumping duty shall be released.

Article 3

Article 1(2) may be amended to add new exporting producers from the People's Republic of China and make them subject to the appropriate weighted average anti-dumping duty rate for cooperating companies not included in the sample. A new exporting producer shall provide evidence that:

(a) it did not export the goods described in Article 1(1) during the period of investigation (1 July 2024 to 30 June 2025);

(b) it is not related to an exporter or producer subject to the measures imposed by this Regulation, and which could have cooperated in the original investigation; and

(c) it has either actually exported the product concerned or has entered into an irrevocable contractual obligation to export a significant quantity to the Union after the end of the period of investigation.

Article 4

This Regulation shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, 24 September 2026.

For the Commission
The President
Ursula VON DER LEYEN

ANNEX

Other cooperating exporting producers not sampled

Country	Name	TARIC additional code
People's Republic of China	Anhui Wanshen Biotechnology Co., Ltd.	88BS
	Jianyuan Group: — HENGYUAN BIOTECHNOLOGY CO., LTD., — JIANYUAN INTERNATIONAL CO., LTD.	88BT
	Linyi Yuwang Vegetable Protein Co., Ltd.	88BU
	SHANDONG FURUN BIOTECHNOLOGY CO., LTD	88BV
	SHANDONG HUA-THAI FOODPRODUCTS CO., LTD.	88BW
	Shandong Jindu Talin Foods Co.,Ltd.	88BX
	YANTAI T.FULL BIOTECH CO.,LTD.	88BY
	Yosin Biotechnology (Yantai) Co., Ltd.	88BZ
	ZHAOYUAN XIRIBEN FOOD STUFF CO., LTD	88CA