

appendix

Chloroprene rubber anti-dumping expiry review

The basic facts on which the award is based

1. The original anti-dumping measures

On May 10, 2005, the Ministry of Commerce issued Announcement No. 23 of 2005,

Decided to impose anti-dumping on imports of neoprene originating in Japan, the United States and the European Union

tax, the implementation period is 5 years. Among them, the Japanese corporate tax rate is 2%-151%, and the US corporate tax rate is 2%-151%.

The corporate tax rate is 151%, and the EU corporate tax rate is 11%-151%.

On August 24, 2010, the Ministry of Commerce issued Announcement No. 49 of 2010,

It was decided that starting from August 28, 2010, imported neoprene rubber originating in Japan

The applicable anti-dumping tax rate adjustment is: Japan Denki Chemical Industry Co., Ltd.

9.9%, Toso Co., Ltd. 10.2%, Showa Denko Co., Ltd. 20.8%, etc.

His Japanese company 43.9%.

On May 10, 2010, the Ministry of Commerce issued Announcement No. 25 of 2010,

Decided to carry out the first inspection on imported neoprene originating in Japan, the United States and the European Union

Anti-dumping expiry review case investigation. On May 9, 2011, the Ministry of Commerce released

Announcement No. 21 of 2011, it was decided that from May 10, 2011, according to the

Announcement No. 23 of 2005 and Announcement No. 49 of 2010 of the Ministry of Foreign Affairs of the People's Republic of China

Imports of neoprene from Japan, the United States and the European Union continue to impose anti-dumping duties, implement

The term is 5 years.

On July 26, 2013, the Ministry of Commerce issued Announcement No. 45 of 2013,

It has been decided that starting from July 26, 2013, the

The anti-dumping tax rate applicable to the imported neoprene rubber of the company was adjusted to 20.8%.

On December 25, 2015, the Ministry of Commerce issued Announcement No. 68 of 2015,

The decision was made by Denka Corporation (Denka Corporation) from December 25, 2015

Company Limited) inherited Denki Chemical Industry Co., Ltd. (DENKI

KAGAKU KOGYO KABUSHIKI KAISHA) on neoprene anti-dumping measures

The applicable 20.8% anti-dumping duty rate and other rights and obligations. Japan

DENKI KAGAKU KOGYO KABUSHIKI

The products under investigation exported to China under the name of KAISHA are applicable to neoprene anti-dumping

The 43.9% anti-dumping tax rate applicable to "other Japanese companies" in the dumping measures.

On November 9, 2016, the Ministry of Commerce issued Announcement No. 62 of 2016,

Decision by ARLANXEO Germany GmbH since November 9, 2016

(ARLANXEO Deutschland GmbH) successor to LANXESS Germany GmbH

(LANXESS Deutschland GmbH) in neoprene anti-dumping measures

Applicable 11% anti-dumping duty rate and other rights and obligations. Responsibility to LANXESS Germany

Co., Ltd. (LANXESS Deutschland GmbH) name exported to China

The products under investigation are applicable to "other EU companies" in the anti-dumping measures of neoprene rubber

The applicable anti-dumping duty rate of 151%.

On May 9, 2016, the Ministry of Commerce issued Announcement No. 18 of 2016, deciding

Imports originating in Japan, the United States and the European Union are scheduled to start from May 10, 2016

Chloroprene is conducting the second anti-dumping expiry review investigation. May 9, 2017

The Ministry of Commerce issued Announcement No. 19 of 2017, deciding that effective from May 10, 2017

Since then, according to the Ministry of Commerce Announcement No. 23 of 2005, Announcement No. 49 of 2010, Announcement No. 21 of 2011, Announcement No. 45 of 2013, Announcement No. 68 of 2015 Announcement and Announcement No. 62 of 2016, on the origin of Japan, the United States and the European Union Imported chloroprene rubber will continue to be subject to anti-dumping duties for a period of 5 years.

On January 29, 2021, the Ministry of Commerce issued Announcement No. 3 of 2021. In 2020

After the end of the Brexit transition period on December 31, trade previously imposed on the EU

The relief measures continue to apply to the EU and the UK for an unchanged period; after that date

For the new trade remedy investigation and review case initiated by the EU, the UK will no longer be regarded as the

Processed by EU Member States.

## 2. Investigation procedure

### (1) Case filing and notification.

#### 1. File a case.

On March 8, 2022, the Ministry of Commerce received a notification from Shanxi Huojiachang Chemical Synthetic Rubber Co., Ltd.

Co., Ltd. and Shanna Synthetic Rubber Co., Ltd. represent China's neoprene rubber production

The application for expiry review of anti-dumping measures submitted by the industry. The applicant contends that if the final

Anti-dumping measures against imports of neoprene originating in Japan, the United States and the European Union

Chinese dumping may continue or reoccur, and damage to Chinese industries may

Can continue or reoccur, request the Ministry of Commerce to review the origin of Japan, the United States and the European Union

Conduct final review investigation of imported chloroprene rubber, and maintain

Anti-dumping measures imposed on imports of neoprene by the United States and the European Union. Considering the UK

The actual situation of chloroprene rubber, the applicant did not

Apply for expiry review of the anti-dumping measures applicable to rubber.

Investigative agency's claim on the applicant's qualifications and application, and related supporting materials

The materials have been reviewed and the applicant and the application form are considered to be in compliance with Article 1 of the Anti-dumping Regulations.

Article 11, Article 13, Article 14, Article 15, Article 17 and Article 4

Article 18.

According to the review results, the investigation agency issued an announcement on May 9, 2022,

Deciding on the anti-corruption measures applicable to imports of neoprene originating in Japan, the United States and the European Union

Dumping measures are subject to expiry review investigations. From May 10, 2022, the original

The anti-dumping measures applicable to imports of neoprene produced in the UK have been terminated. this time

The dumping investigation period for review is from January 1, 2021 to December 31, 2021.

The industrial damage investigation period is from January 1, 2017 to December 31, 2021.

## 2. Notification of case filing.

On April 29, 2022, the investigating agency notified the Japanese embassy in China, the U.S.

The embassy in China and the EU delegation in China have officially received the

Submitted application for final review investigation. On May 9, 2022, the investigation agency released

Anti-dumping Applicable to Imports of Neoprene Originating in Japan, the United States and the European Union

Measures to carry out the final review investigation of the announcement, to the Japanese embassy in China, the United States

The embassy in China and the EU delegation in China provided the announcement of filing the case and the publicity of the application

open version. On the same day, the investigative agency notified the applicant of the case and the relevant

off the business.

## 3. Public information.

In the announcement of filing the case, the investigation agency informed the interested parties that they could

Download from the website of the Trade Remedy Bureau of the Ministry of Commerce or go to the Trade Remedy Open Letter of the Ministry of Commerce

In the information review room, you can check the public version of the relevant information of this anti-dumping review investigation.

On the day of filing the case, the investigation agency checked through the Ministry of Commerce's trade remedy public information The office released the public version of the application submitted by the applicant in this case, and posted the electronic version on the website of the Ministry of Commerce.

(2) Register to participate in the survey.

Within the stipulated time limit, the EU delegation to China, the Japanese manufacturer NEC Co., Ltd., EU manufacturer ARLANXEO Germany GmbH, domestic manufacturer Shanxi Huochang Chemical Synthetic Rubber Co., Ltd. and Shanna Synthetic Rubber Co., Ltd.

The company registers with the investigation agency to participate in the final review investigation according to the requirements of the case filing announcement. Checked and submitted relevant materials in the "Reference Format for Registering to Participate in the Survey".

(3) Distributing questionnaires and collecting answers.

On June 8, 2022, the investigation agency issued a The "Questionnaire for Foreign Exporters or Manufacturers", "Questionnaire for Domestic Producers" Volume" and "Domestic Importer Questionnaire". The investigation agency will distribute the questionnaire The electronic version of the knowledge and questionnaire is published on the website of the Ministry of Commerce, and any interested parties can View and download the questionnaire for this case from the website of the Ministry of Commerce. On the same day, the investigating agency also Through the "Trade Remedy Investigation Information Platform" (<https://etrb.mofcom.gov.cn>) distributed the questionnaire notice and questionnaire.

Within the stipulated deadline, EU manufacturer ARLANXEO Germany GmbH submitted Application for extension of submission of questionnaire answers has been granted. After review, the investigation agency agreed to the Enterprises postpone the submission of questionnaire answers.

As of the deadline for submitting the questionnaire, EU manufacturers ARLANXEO Germany GmbH,

Domestic producers Shanxi Huochanghua Synthetic Rubber Co., Ltd. and Shanna Synthetic Rubber Co., Ltd. Adhesive Co., Ltd. submitted the answers to the questionnaire to the investigating authority.

(4) Receive comments from interested parties.

On August 25, 2022, ARLANXEO Germany GmbH submitted to the investigating authority Submitted the "Alanxin Kode Co., Ltd. requests the Ministry of Commerce of China to terminate the import of neoprene products Anti-dumping measures or termination of anti-dumping duties on imports of neoprene originating in the EU Opinions on Dumping Duty.

On December 2, 2022, the applicant submitted the "About ARLANXEO Germany Co., Ltd. < request the Chinese Ministry of Commerce to terminate the anti-dumping of imported neoprene products Anti-dumping measures or termination of anti-dumping duties on imports of neoprene originating in the EU Submissions > Comments.

On January 17, 2023, the applicant filed the Neoprene Anti-dumping Period The applicant of the final review case concerning <Application> China's export of chloroprene rubber from the United States to China Supplementary material on product dumping.

(5) On-site verification.

In order to understand the status of China's neoprene rubber industry, verify the submissions submitted by Chinese manufacturers The completeness, authenticity and accuracy of the materials, according to the Second Anti-dumping Regulations Ten articles stipulate that from March 21 to March 23, 2023, the investigation agency Synthetic Rubber Co., Ltd. conducted an on-site inspection. After the on-site inspection, The inspected enterprise submitted supplementary materials to the investigation agency.

(6) Public information.

According to the provisions of Article 23 of the Anti-dumping Regulations, the investigation authority has

All public materials of this case received and produced during the investigation are published in the "Trade Rescue Economic Survey Information Platform" (<https://etrb.mofcom.gov.cn>), and

Send it to the Trade Remedy Public Information Review Office of the Ministry of Commerce in a timely manner. All interested parties can

To search, browse, extract, and copy relevant public information.

### 3. Review product range

The product scope of the expiry review of the anti-dumping measures is the original anti-dumping measures.

Applicable products are the same as those published in the Ministry of Commerce Announcement No. 23 of 2005

Consistent.

### 4. Possibility of continued or recurring dumping

European Union

Arlanxeo Deutschland GmbH registered to participate in the investigation within the stipulated time

and submitted questionnaire responses. Other EU producers and exporters did not participate

survey, and no questionnaire responses were submitted. The applicant provided the investigation agency with the European

Relevant data and evidential materials of the neoprene rubber industry in China.

### 1. Dumping investigation situation.

The investigation agency determined in Announcement No. 23 of 2005 that the

There is dumping of chloroprene rubber, and the dumping margin is 11%-151%. In 2011 the investigating agency

Announcement No. 21 of 2017 and Announcement No. 19 of 2017 decided that the

Union's neoprene continues to implement anti-dumping measures. Neoprene anti-dumping measures implemented

During the implementation period, disinterested parties claimed the dumping of neoprene originating in the EU and

The dumping margin changes.

ARLANXEO DE GERMANY GmbH

(1) Normal value.

The investigation agency reviewed the models of the company's investigated products and similar products

Divide the situation. In the answer sheet, the company claimed that the products under investigation were not divided into models. Tried

The investigation agency decided to accept the company's claim on model division.

The investigating authority examined the company's sales in the EU. Upon review,

During the dumping investigation period, the company's domestic sales volume of similar products accounted for

The proportion of export sales of the product under investigation exceeds 5%, which is in line with the determination of normal value

Basic quantity requirements. During the dumping investigation period, the company claimed that similar products in the EU

Products are all sold directly to unaffiliated end users and unaffiliated traders. investigation machine

The relevant decision relies on the company's total intra-EU sales as the basis for determining normal value

foundation.

The investigating authority reviewed the production cost and expense data submitted by the company. close

Based on the production cost, after review, the investigation agency determined that the company's production cost data

It can reasonably reflect the production situation of the company, and it is decided to accept it. About sales fee

expenses, management expenses and financial expenses, the investigation agency found after review, first, the table

6-6, Table 6-7, and Table 6-8 are incomplete, and they have not filled in the investigation period and China

Allocation data related to market sales and market sales in third countries (regions)

relevant data. In addition, Table 6-8 "Financial and Other Expenses Allocation Details" is also

Data related to sales in the domestic market is not filled in. Second, regarding Table 6-6, Table 6-7,

The data in Table 6-8 has been filled in, but the company did not specify the detailed items of each expense as required

The calculation process for the purpose, without explaining the reasons for the proposed allocation method and providing supporting documents

pieces. When the relevant expenses are apportioned to similar domestic (regional) products of the product under investigation,



The apportionment results include other products outside the scope of the product under investigation. Third, public

The company did not answer the questionnaire in Chinese, but the company answered in English and

Chinese translation not provided. Therefore, the investigation agency believes that the company's questionnaire filled

The data cannot reasonably reflect the specific cost of the product under investigation and similar products

In this situation, it was decided to adopt the method of apportionment according to the proportion of sales revenue to determine the products under investigation and

Specific cost data for similar products.

Based on the above-mentioned adjusted and recalculated cost data, the investigation authority,

A test was carried out to see if the company's similar products were sold below cost in the EU. through

Review, during the dumping investigation period, the number of domestic sales of similar products of the company below cost

The volume accounts for more than 20% of the total domestic sales of similar products. According to the Anti

According to Article 4 of the Dumping Regulations, the investigation agency decides to exclude the dumping below the cost

Intra-EU sales for sale are used as the basis for determining normal value.

(2) Export price.

The investigation agency reviewed the company's export and sales of the products under investigation to China.

condition. During the dumping investigation period, the company exported to China through various channels.

sales to non-affiliated customers in China; second, through a customs office located in a third country

export to non-affiliated customers in China; thirdly, through a company located in China

Affiliated traders export to non-affiliated customers in China.

According to Article 5 of the Anti-dumping Regulations, the investigation agency decided to

A sales method that uses the sales price between a company and an unaffiliated customer as the

Basis for determining the export price; for the second mode of sale, third country customs

The sales price between the affiliated traders and the Chinese non-affiliated customers is used to determine the export

price basis; for the third sales method, the Chinese affiliated traders and

The sales price between non-affiliated customers in China is used as the basis for determining the export price.

(3) Adjustment items.

According to Article 6 of the Anti-dumping Regulations, for fair and reasonable comparison,

The investigation agency carried out one by one the adjustment items affecting the price comparability of the company.

review.

about normal value.

After review, the investigation agency decided to accept the company's claims of kickbacks, inland transportation, etc.

Output - Adjustment items such as factory/warehouse to customer, credit charges, etc.

With regard to commissions, the company respondents claimed that the sales and commissions provided to domestic affiliates

Marketing services pay commissions. After review, as stated in the company's answer sheet, the dumping investigation

During the inspection period, all similar products of the company in the EU were directly sold to unrelated end users.

Accounts and non-affiliated traders, there is no associated sales. At the same time, the answer sheet did not

Claim to provide any supporting documentation. Therefore, the investigation agency decided to adjust the company's commission

The whole claim is not accepted.

about export prices.

After review, the investigation agency decided to accept the company's claims of kickbacks, international shipments, etc.

Transportation fee, credit fee, China inland freight - port to warehouse, pre-sale storage fee

Use, China inland freight - from warehouse to non-related customers, factory loading and unloading charges, import

Customs duties, anti-dumping duties, import declaration fees, commissions, affiliated trader profits

Run.

The company did not report adjustment items such as indirect expenses of related traders.

The associated traders also failed to report operating and financial, production cost and related expense information,

Therefore, in accordance with the provisions of Article 21 of the Anti-dumping Regulations, the investigation authority

Use the facts obtained and the best information available to determine the relationship between related traders

pick up fee. Combined with the responding company's answers, the investigation agency

The relevant data of China Co., Ltd. supplemented the indirect costs of related traders.

charge adjustment.

(4) Regarding the CIF price (CIF price).

After review, the investigation agency decided to accept the CIF price data of the company.

The investigation agency determined that during the review investigation period, after adjusting the sales conditions

ARLANXEO Germany Limited

There is dumping of neoprene rubber exported by the company to China.

Other EU companies

On May 9, 2022, the investigation agency initiated this final review investigation. when

On the 1st, the investigation agency notified the EU delegation in China and the production listed in the application

merchants and exporters, and publish the announcement on the website of the Ministry of Commerce, any interest

All related parties can check the announcement of the filing of this case on the website of the Ministry of Commerce. After filing the case, call

The investigation agency gives each interested party 20 days to register to participate in the investigation period, and

The interested parties shall be notified of the case filing within a reasonable time. After the case is filed, the investigation

The agency will post the questionnaire on the website of the Ministry of Commerce, and any interested parties can

View and download the questionnaire for this case from the website of the Ministry of Commerce.

The investigation agency has tried its best to notify all interested parties, and has done its best to

Dali reminded all interested parties of the consequences of not cooperating with the investigation. For tune

Companies that have fulfilled their notification obligations but failed to provide necessary information to cooperate with the investigation,

According to the provisions of Article 21 of the "Anti-dumping Regulations", the investigation agency makes a comparative analysis

Based on the information obtained during the investigation, it was determined that the relevant

The situation is the best information available, and based on this, it is determined that other EU companies export to China

Mouth of neoprene exists dumping.

To sum up, the investigation agency determined that during the review period of the dumping investigation, the origin

There is dumping of imported neoprene in the EU.

2. The dependence of EU neoprene on the international market.

The applicant in this case provided the "Global and Japan, the United States, the European Union neoprene

Production, consumption and sales prices", including EU capacity, output, consumption, etc.,

According to EU Customs Statistics provides EU total export data, according to China Customs Statistics

provided relevant data on China's neoprene imports from the EU, and submitted relevant

related evidence. Arlanxeo Deutschland GmbH asserts in comments that it is an EU

The only manufacturer of the product under investigation, filled in the company's production capacity, output and exports

data. Other EU producers and exporters did not cooperate with the investigation and did not submit the investigation

The questionnaire answers also do not provide information on the overall situation of the neoprene market in the EU.

The investigating authority examined the applicant and ARLANXEO Germany GmbH submitted

Data and evidence material related to the EU Neoprene market situation for . Investigator attention

Noting that ARLANXEO Germany GmbH asserts that it is the only product under investigation in the EU

Product manufacturer, the company's production capacity and output are the total production capacity and total output of chloroprene rubber in the EU

quantity. The investigating authority decided to accept the company's data as the EU's total neoprene production

Energy and total production data. Regarding EU neoprene demand data, ARLANXEO

German limited company citing the total EU requirements provided by the applicant in the comments

Quantitative analysis of the EU market situation, no disagreement on the above content,

The investigation agency decided to accept the EU demand data for chloroprene rubber provided by the applicant.

Regarding EU neoprene export data, Arlanxeo Deutschland GmbH hosts

Zhang, Arlanxeo Deutschland GmbH exports 90% of neoprene rubber to China

According to the customs statistics of the People's Republic of China, the number of neoprene rubber exported from the EU to China in the same period

most of the amount. Therefore, ARLANXEO has reason to believe that its dumping investigation period

The export of chloroprene rubber to China can represent the EU neoprene rubber in the same period

Exports to China. Accordingly, ARLANXEO denies the Chinese self-identification provided by the applicant.

The accuracy of data related to EU imports of neoprene. Allxin

Based on the total export volume data, analyze the EU neoprene export situation.

The applicant submits a comment arguing that, in the present case, although Arlanxeo Germany has Ltd. is the only neoprene producer in the EU, but the EU participates as a whole

In contrast to the survey, Arlanxeo Deutschland GmbH's import and export statistics cannot be made

Statistics for the European Union. The total export volume of neoprene in the EU provided by the applicant

According to the data related to China's import of chloroprene rubber from the EU, the

Customs and China Customs statistics are accurate and authoritative.

The investigation agency believes after review that, first, in this final review investigation,

The EU is involved in the investigation as a whole, although ARLANXEO Germany has

Ltd. is the only neoprene producer in the EU, but due to Arlanxeo statistics

The company's export data does not include other export channels of neoprene in the EU.

Therefore, the export data of ARLANXEO as a company cannot completely and accurately reflect the

The overall export situation of the Union. Second, the EU neoprene total output provided by the applicant

The export data and EU neoprene export data to China come from the EU sea respectively.

Customs data and Chinese customs data are accurate and authoritative. Third, Aaron

ST said its data came from its accounting system, but did not provide any supporting evidence and

Evidence. In summary, the investigation agency decided to accept the export data provided by the applicant

And based on this to analyze the EU neoprene export situation and the EU neoprene in China competition in the domestic market.

Arlanxeo Deutschland GmbH proposed that due to the involvement of the company's business secrets, the application Please keep the relevant EU market situation data you provide confidential. After review by the investigating agency, It was decided to use interval analysis for data involving confidential information.

(1) Capacity, output and idle capacity.

From 2017 to 2021, the EU's neoprene production capacity remains unchanged, both 50,000-70,000 tons; the output in the same period was 40,000-50,000 tons, 35,000-45,000 tons, 33,000-43,000 tons 10,000 tons, 34,000-44,000 tons, and 34,000-44,000 tons, showing a downward trend overall. During this period During the period, there was a large amount of idle production capacity (capacity reduction) in EU neoprene rubber, in 2017 From 2021 to 2021, they are 10,000-20,000 tons, 12,000-22,000 tons, 15,000-25,000 tons, 25,000-35,000 tons and 15,000-25,000 tons, the overall upward trend, idle capacity The proportion of total production capacity is 23.43%, 27.45%, 30.92%, 46.54% and 28.88%. The data shows that the EU has a strong neoprene production capacity, The overall idle capacity is on the rise.

(2) Market demand for chloroprene rubber in EU.

From 2017 to 2021, the demand for neoprene in the EU is 5.03 10,000 tons, 50,200 tons, 50,600 tons, 46,000 tons and 46,800 tons, overall A downward trend. The data shows that the demand for neoprene in the market in the EU region It has shrunk, and the ability to digest the capacity of neoprene in the EU has weakened, and the capacity to digest Increasing reliance on international markets outside the EU region.

(3) EU neoprene export situation.

From 2017 to 2021, the export volume of EU neoprene is 4.46

10,000 tons, 40,800 tons, 40,200 tons, 34,600 tons and 42,400 tons, overall

A slight decline, the export volume accounted for more than 90% of the output. as shown by data,

More than 90% of the production of chloroprene rubber in the EU needs to be exported, and the export has been

It is an important sales method of neoprene in the EU.

The above data show that during the implementation of anti-dumping measures, the EU chloroprene rubber stocks

In terms of larger production capacity and idle capacity, idle capacity is generally on the rise.

The market demand in the EU region is on a downward trend, and its capacity to absorb capacity is limited.

High degree of dependence on the international market.

### 3. Competition situation of EU neoprene in Chinese market.

According to the statistics of the Customs of the People's Republic of China, from 2017 to 2021,

The quantity of neoprene rubber imported by China from the EU is 4806.96 tons, 3712.62 tons

Ton, 3094.77 ton, 3907.76 ton, 4493.64 ton, the overall fluctuating decline

trend, accounting for 22.83% and 22.83% of China's total imported neoprene

18.44%, 19.54%, 24.90% and 25.31%, showing an overall upward trend. Resented

Affected by the dumping measures, the amount of neoprene imported by China from the EU has decreased, but

EU neoprene continues to export to China, during the review period of industrial damage investigation

It also accounts for a large proportion of China's total imports.

China is the world's largest neoprene consumer market. submitted by the applicant

According to the data, from 2017 to 2021, China's neoprene market demand is

46,800 tons, 64,100 tons, 56,800 tons, 59,700 tons and 66,100 tons

tons, with a cumulative increase of 41.24%, accounting for 17.02% of the global market demand

rose to 23.86%. For EU neoprene producers, the Chinese market has a strong

The attractiveness is its important target market. In China's neoprene market, the

The market competition between imported products and similar domestic products is fierce, and the price factor is the  
One of the important means of war. If anti-dumping measures are lifted, in order to maintain its  
Market share, EU neoprene may continue to be exported to China by way of dumping.

The above evidence shows that there is a large production capacity of chloroprene rubber in the EU, and the domestic  
Insufficient market demand, increased excess capacity, and dependence on the international market  
high. China has always been an important target market for EU exports.

In the case of anti-dumping measures, there is still dumping of EU chloroprene rubber exports to China,

Further evidence that EU producers are still adopting this low-price pricing strategy to absorb their

Overcapacity, competing for market share in China. In the Chinese market, neoprene market

There are many competitors in the market, there is no substantial difference between products, and price is an important determinant.

Therefore, if the anti-dumping measures are terminated, EU producers are likely to absorb their large

The volume needs to rely on export production capacity, and continue to export to China through dumping pricing.

ARLANXEO DE GERMANY GROUP submits comments for 2017-2021

During the year, the EU's low-price exports to other third countries (regions) accounted for its total exports

The proportions of the quantity are 83.3%, 70.0%, 74.7%, 86.7% and 89.1% respectively. Europe

The EU's exports to third countries (regions) increased, indicating that the export of neoprene to China was relatively

The reduced part is transferred to the third country (region) market. In addition, third countries (land

region) market price is close to the Chinese market price, compared with the third country (region)

As far as the market is concerned, the price in the Chinese market has not shown any substantial attractiveness.

Applicant submits comments arguing that EU neoprene is not effective in other third countries

An increase in the proportion of low-price exports in (regions) to export volume does not necessarily mean low prices

Exports increased. In 2017, the European Union's neoprene rubber was sold to third countries (regions) at low prices

The proportion of export volume to its total export volume is 83.3%, and it will be 86.7% in 2020, accounting for



The proportion increases, but in 2020, regardless of the low-price export volume to third countries (regions)

Still, the total export volume is lower than the export volume in 2017. If anti-dumping measures are terminated,

The EU neoprene will inevitably continue to expand its exports to the Chinese market, and to third countries

There is a great possibility that the export of the (regional) market will turn to China.

After review, the investigation agency believes that there is a relatively large production capacity in the EU neoprene market.

The ratio of idle production capacity to total production capacity rose from 23.43% to 28.88%, and the export volume

The proportion of production has always been higher than 90%, and the international market is its main sales market

market, the EU's export price of neoprene to China and the EU's export price to third countries (regions)

The convergence of export prices does not prove that the Chinese market is not attractive. in anti-dumping measures

Under the constraints of the EU, from 2017 to 2021, the EU's exports to China accounted for

The proportions of the amount are 10.78%, 9.11%, 7.70%, 11.28% and 10.61%, respectively,

Although there was a decrease at the beginning of the damage investigation period, it began to increase again at the end of the period and did not

There was a marked reduction. At the same time, from 2017 to 2021, from the EU Chloroprene

The proportion of rubber imports in China's total imports rose from 22.83% to 25.31%.

The EU is China's main source of neoprene imports, and exports to China still have

The dumping just shows that China is the world's largest neoprene consumer market,

It is very attractive to EU producers and exporters. If anti-dumping measures are terminated

In order to gain market share in China and absorb the spare capacity in the EU, EU manufacturers,

The exporter is likely to continue exporting to China in the form of dumping, therefore, the investigating authority

Decided not to accept the above claims of ARLANXEO Germany GmbH.

##### 5. Domestic similar products and domestic industry

###### (1) Identification of similar domestic products.

The investigation agency determined in Announcement No. 14 of 2022 that the anti-dumping period

The scope of products under investigation in the final review is the scope of products to which the original anti-dumping measures are applicable.

It is consistent with the product range announced in the 2005 Announcement No. 23 of the Ministry of Commerce.

The investigation agency determined in Announcement No. 23 of 2005 that China's domestic industry

The neoprene produced and the imported neoprene originating in Japan, the United States and the European Union are similar products.

The information submitted by the applicant shows that in this review investigation, the

Imported neoprene in Japan, the United States and the European Union vs. neoprene produced by domestic industry

In terms of physical properties, production process and main raw materials, downstream uses, and sales

Channels and customer groups have not undergone substantial changes. no stake

The parties disagreed on this.

According to Article 12 of the "Anti-dumping Regulations", the investigation agency determined that the Chinese

Neoprene produced by the domestic industry in China and imported from Japan, the United States and the European Union

Mouth neoprene is the same product.

(2) Identification of domestic industries.

According to Article 11 of the Anti-dumping Regulations, the domestic industry refers to the

all producers of similar products in the country, or their total

Producers of the major part of the total output.

In this case, the applicants Shanxi Huochangchang Chemical Synthetic Rubber Co., Ltd. and Shanna

Synthetic Rubber LLC Submits Domestic Producer Investigation to Investigating Authority

Questionnaire. The survey questionnaire shows that the applicant enterprises in 2017, 2018,

The combined output in 2019, 2020 and 2021 accounted for 20% of the total domestic production of similar products

The proportion of the amount is 100%. According to the provisions of Article 11 of the "Anti-dumping Regulations", the investigation

The investigation agency determined that during the investigation period of this final review, Huo's parents in Shanxi, who responded to the questionnaire,

Total of Chemical Synthetic Rubber Co., Ltd. and Shanna Synthetic Rubber Co., Ltd.

Production constitutes China's domestic chloroprene rubber in this anti-dumping expiry review investigation

Industry, its data can represent the situation of China's domestic industry. During the investigation, no

Stakeholders provide comments on this.

6. The possibility of the damage continuing or reoccurring

According to the provisions of Article 51 of the "Anti-dumping Regulations", the investigation agency shall

If the original anti-dumping measures are terminated, the damage to China's domestic industry continues or recurs

Possibilities were examined.

(1) Domestic industry status.

In this anti-dumping expiry review investigation, according to the "Anti-dumping Regulations"

Articles 7 and 8, the investigation agency shall damage the investigation period of the expiry review of anti-dumping

The relevant economic factors and indicators of China's domestic chloroprene rubber industry were investigated.

Since the relevant data comes from Shanxi Huochangchang Chemical Synthetic Rubber Co., Ltd. and Shanxi

The two companies of Nasyn Rubber Co., Ltd. responded to the questionnaires, and the data of the enterprises in the questionnaires involved

The company's business secrets, if the above data are disclosed to the outside world, it will cause serious damage to the company.

Negative Effects. According to the application of the enterprise, the investigation agency decided to keep the relevant data confidential

The treatment is disclosed in a combination of range and percentage, range method

The actual value of the processed data may be at any level in the range announced by the investigation agency.

flat. See the attached table for details.

1. Demand.

From 2017 to 2021, the demand of China's domestic neoprene industry is respectively

46,800 tons, 64,100 tons, 56,800 tons, 59,700 tons and 66,100 tons

Ton. Among them, 2018 increased by 36.75% compared with 2017; 2019 compared with 2018

decreased by 11.34%; 2020 increased by 5.11% compared to 2019; 2021

An increase of 10.73% over 2020. During the damage investigation period, China's neoprene

Demand is generally on the rise. In 2021, there will be an increase of 41.24% compared to 2017.

## 2. Capacity.

From 2017 to 2021, the production capacity of similar products in the domestic industry will be 2.4-3.0

10,000 tons, 51,000-64,000 tons, 53,000-67,000 tons, 54,000-68,000 tons and 56,000-7.0 tons

tons. Among them, 2018 increased by 112.53% compared with 2017; 2019 compared with 2018

An increase of 4.38% in 2020; an increase of 0.54% in 2020 compared to 2019;

An increase of 3.33% over 2020. During the damage investigation period, similar products in the domestic industry

Production capacity is on the rise, with an increase of 130.77% in 2021 compared to 2017.

## 3. Yield.

From 2017 to 2021, the output of similar products in the domestic industry is

24,000-30,000 tons, 41,000-52,000 tons, 38,000-47,000 tons, 41-52,000 tons

and 47,000-60,000 tons. Among them, 2018 increased by 69.99% compared with 2017; 2019

Compared with 2018, it decreased by 8.09%; in 2020, it increased by 8.98% compared with 2019;

2021 is an increase of 15.64% over 2020. During the damage investigation period, the domestic industry

The output of similar products is generally on the rise, and will increase by 2021 compared to 2017

96.72%

## 4. Sales volume.

From 2017 to 2021, the sales volume of similar products in the domestic industry is

22,000-29,000 tons, 39,000-49,000 tons, 36,000-45,000 tons, 39-49,000 tons

and 43,000-54,000 tons. Among them, 2018 increased by 70.37% compared with 2017; 2019

Compared with 2018, it decreased by 6.77%; in 2020, it increased by 7.44% compared with 2019;

2021 is an increase of 9.87% over 2020. During the damage investigation period, the domestic industry

The sales volume of similar products is generally on the rise, and will increase in 2021 compared to 2017

87.21%

#### 5. Market share.

From 2017 to 2021, the market shares of similar products in the domestic industry are

48%-61%, 61%-76%, 63%-79%, 65%-81%, and 64%-80%. Of which 2018

An increase of 10-20 percentage points over 2017; an increase of 2019 over 2018

increased by 2-8 percentage points; in 2020 an increase of 1-6 percentage points compared to 2019;

In 2021, it will be 0-5 percentage points lower than in 2020. During the damage investigation period, the state

The market share of similar products in the domestic industry is generally on the rise. In 2021, compared with 2017

Annual growth of 15-25 percent.

#### 6. Sales price.

From 2017 to 2021, the sales prices of similar products in the domestic industry are

22300-27500 yuan/ton, 24300-30100 yuan/ton, 22300-27500 yuan/ton

tons, 21600-26700 yuan/ton and 24500-30300 yuan/ton. Of which in 2018

An increase of 9.21% compared to 2017; a decrease of 8.02% in 2019 compared to 2018;

In 2020, it will be 3.22% lower than in 2019; in 2021, it will be higher than in 2020

13.32%. During the damage investigation period, the sales prices of similar products in the domestic industry showed an overall trend of

An upward trend, with an increase of 10.18% in 2021 compared to 2017.

#### 7. Sales revenue.

From 2017 to 2021, the sales revenue of similar products in the domestic industry is

570-710 million yuan, 1.06-1.32 billion yuan, 910-1.14 billion yuan, 950-11.8 billion yuan

100 million yuan and 1.18-1.47 billion yuan. Among them, 2018 increased by 86.06% compared with 2017;

In 2019, it decreased by 14.25% compared to 2018; in 2020, it increased compared to 2019 3.98%; 2021 is an increase of 24.51% compared to 2020. During the damage investigation period, The sales revenue of similar products in the domestic industry is generally on the rise. In 2021, compared with 2017 An annual increase of 106.50%.

#### 8. Profit before tax.

From 2017 to 2021, the pre-tax profits of similar products in the domestic industry are (-800)-(-600) ten thousand yuan, 12-14 million yuan, (-21000)-(-19000) Ten thousand yuan, (-11000)-(-9000) ten thousand yuan and (-9000)-(-7000 million) ten thousand Yuan. Among them, both 2017 and 2019-2021 were losses; 2018 and 2017 Compared with 2018, from loss to profit; in 2019, compared with 2018, from profit to profit is a loss; in 2020, compared with 2019, the loss will decrease by 51.79%; in 2021 Compared with 2020, the loss has been reduced by 17.60%. During the damage investigation period, the domestic The pre-tax profit of similar products in the industry fluctuates sharply. , losses increased substantially.

#### 9. Return on investment.

From 2017 to 2021, the investment yields of similar products in the domestic industry are respectively (-0.5%)-(-0.3%), 0.6%-0.8%, (-13.0%)-(-10.5%), (-6.6%)-(-5.3%), (-5.4%)-(-4.3%). Among them, in 2017, From 2019 to 2021, the value will be negative, and in 2018, compared with 2017, it will turn losses into profits; In 2019, it turned negative again; in 2020, compared with 2019, the loss decreased by 5-10% percentage points; in 2021 compared with 2020, losses will be reduced by 0-5 percentage points. During the damage investigation period, the return on investment of similar products in the domestic industry fluctuated sharply Compared with 2017, the loss in 2021 will increase by 0-5 percentage points.

10. Operating rate.

From 2017 to 2021, the operating rates of similar products in the domestic industry are 90%-105%, 71%-89%, 62%-78%, 68%-85%, and 76%-95%. In 2018, it was 15-25 percentage points lower than in 2017; in 2019, compared with 2018 decreased by 5-15 percentage points in 2020; increased by 0-10 percentage points in 2020 compared with 2019 percentage points; 2021 will be 5-15 percentage points higher than 2020. damage investigation

During the period, the start of production of similar products in the domestic industry fell first and then rose, showing an overall decline

In 2021, it will be 10-20 percentage points lower than in 2017.

11. Employment figures.

From 2017 to 2021, the number of employees of similar products in the domestic industry is 1000-1400 people, 1300-1600 people, 1200-1500 people, 1100-1400 people and 1100-1400 people. Among them, 2018 increased by 23.06% compared with 2017; 2019 9.37% less than 2018; 8.93% less in 2020 than 2019; 2021 is 0.43% less than 2020. During the damage investigation period, the domestic industry

A slight increase in like-for-like employment overall, with more jobs in 2021 than in 2017

1.14%

12. Labor productivity.

From 2017 to 2021, the labor productivity of similar products in the domestic industry is 20-27 tons/year/person, 28-35 tons/year/person, 30-37 tons/year/person, 37-46 tons/year/person and 44-55 tons/year/person. Among them, 2018 increased compared with 2017 38.14%; 2019 is 1.41% lower than 2018; 2020 is 2019 lower

An increase of 19.66%; 2021 is an increase of 16.14% over 2020. damage investigation

During the period, the labor productivity of similar products in the domestic industry has generally shown an upward trend. In 2021

Compared with 2017, it has increased by 94.73%.

#### 13. Per capita salary.

From 2017 to 2021, the per capita employment of similar products in the domestic industry

The capital is 47,000-58,000 yuan/year/person, 53,000-65,000 yuan/year/person, 5.8-7.2 yuan

10,000 yuan/year/person, 64,000-79,000 yuan/year/person, and 69,000-86,000 yuan/year/person.

Among them, 2018 increased by 10.75% compared with 2017; 2019 increased by 2018

increased by 14.50%; 2020 increased by 9.52% compared to 2019; 2021 compared to 2020

An annual increase of 9.93%. During the damage investigation period, the per capita labor force of similar products in the domestic industry

Investment is on the rise, with an increase of 52.75% in 2021 compared to 2017.

#### 14. Ending inventory.

From 2017 to 2021, the ending inventory of similar products in the domestic industry is

280-350 tons, 670-840 tons, 980-1200 tons, 2400-2900 tons and

6300-7000 tons. Among them, 2018 increased by 138.31% compared with 2017; 2019

An increase of 46.74% over 2018; an increase of 143.42% in 2020 over 2019;

2021 is an increase of 153.56% over 2020. During the damage investigation period, the domestic

The ending inventory of similar products in the industry continued to increase.

#### 15. Cash flow from operating activities.

From 2017 to 2021, cash flow from operating activities of similar products in the domestic industry

The amount is 110-140 million yuan, 49-62 million yuan, (-3800)-

(-2600) million, (-6000)-(-4800) million and (-5800)-(-4500)

ten thousand yuan. Among them, the cash inflow in 2018 decreased by 55.48% compared with 2017;

Annual operating cash flow turned into net outflow; net cash outflow in 2020 will increase compared with 2019

An increase of 74.89%; the net cash outflow in 2021 will be 5.06% lower than that in 2020.



During the damage investigation period, the cash flow from operating activities of similar products in the domestic industry showed huge

In a fluctuating state, the overall trend is downward, from the net inflow at the beginning of the period to the net outflow at the end of the period.

16. Investment and financing capabilities.

During the investigation period, there was no evidence showing the investment and financing capabilities of similar products in the domestic industry

Adversely affected by dumped imports.

The investigation agency has analyzed the above-mentioned economic factors and indicators of the domestic industry,

Relevant data and evidence show that during the implementation of anti-dumping measures, the domestic industry

A certain degree of recovery and development has been obtained. During the damage investigation period, domestic chloroprene rubber

The demand, production capacity, and output of the rubber industry have all increased, and the sales of similar products have also increased

Trend, market share growth, sales price rebounded, sales revenue increased,

Per capita wages increased, and the number of employed people and labor productivity also increased.

After investigation, the demand for chloroprene rubber in China showed an overall growth trend during the damage investigation period.

In 2021, compared with 2017, the growth rate will reach 41.24%.

The production capacity of products will increase accordingly, which will increase by 130.77% in 2021 compared with 2017, but still

Lower than the domestic demand level of neoprene. Domestic production of similar products compared to 2021

In 2017, the cumulative growth rate was 96.72%, which was lower than the growth rate of production capacity, and the overall operating rate

In 2021, compared with 2017, it will decrease by 10-20 percentage points.

The production capacity of similar products in the domestic industry has not been effectively utilized. During the same period, domestic sales

Both sales volume and market share showed an increasing trend, among which, the domestic sales volume in the investigation period

The end of the period increased by 87.21% compared with the beginning of the period, but it was still lower than the increase in production, and the inventory at the end of the period increased significantly.

Increase. The sales volume of similar products in the domestic industry has increased, and the price is in the damage investigation period.

At the end of the period, it increased by 10.18% compared with the beginning of the period, driving the total sales revenue of similar products in the domestic industry.

body presents an increasing trend. During the damage investigation period, the pre-tax

Both profits and investment yields fluctuated considerably. With sales in 2018

and price growth, pre-tax profit and return on investment of similar products in the domestic industry

From negative to positive, but due to the decline in sales volume and prices in 2019, pre-tax profit showed a decline again.

In a state of substantial losses, although the profit before tax in 2020-2021 has rebounded, it is still

At a loss level, the return on investment is also negative, and a large amount of domestic industry investment

Funds cannot be effectively recovered. At the same time, the business activities of similar products in the domestic industry

Cash flow also fluctuates greatly, and the cash flow from operating activities in 2017-2018

Both are net inflows, and began to decline sharply in 2018, and both in 2019-2021

Net outflows, domestic industry profitability and financial status are unstable and fragile

status.

(2) The possible impact of the dumping of imported products on the domestic industry.

The investigation agency determined in the No. 23 Announcement of 2005 that it originated in Japan,

Imported neoprene in the US and EU compared with similar products produced by China's domestic industry

The competition conditions between products are basically the same. In this review investigation, there is no stake

The parties put forward different opinions on this, and there is no evidence to show that the above-mentioned competition conditions

Significant changes have taken place. Therefore, the investigative agencies are assessing the

When dumping the import quantity and import price of imported products, the Japanese, American and European

alliances and to be considered.

1. The possibility of a substantial increase in the volume of dumped imports.

According to the data submitted by the applicant, from 2017 to 2021, the

The dumped imports of Japan, the United States and the EU were 20,700 tons and 19,200 tons respectively.

10,000 tons, 15,600 tons, 15,300 tons and 17,400 tons, compared with 2017 in 2018

An annual decrease of 7.25%, 18.78% in 2019 compared to 2018, 2020 compared to 2019

An annual decrease of 1.97%, and an increase of 13.82% in 2021 compared to 2020.

Dumped imports accounted for China's domestic market share from 2017 to 2021

They are 44.23%, 29.95%, 27.46%, 25.62% and 26.32% respectively. 2018

The year-on-year decrease of 14.28 percentage points compared with 2017, and the decrease of 2019 compared with 2018

2.49 percentage points, 1.84 percentage points lower in 2020 than in 2019, 2021

An increase of 0.7 percentage points year-on-year compared with 2020.

From 2017 to 2021, the amount of dumped imports accounted for China's total domestic imports

The proportions of mouth volume were 98.40%, 95.48%, 98.56%, 97.52% and 98.11%,

The average ratio is as high as 97.6%, accounting for the vast majority of China's imports.

Data show that during the damage investigation period, the volume of dumped imports was

From 2017 to 2020, it will continue to decline, and in 2021, it will increase by 13.82% year-on-year.

The same trend is also seen in the share of imported products in the Chinese market. This shows that, in anti-tilt

Under the effect of the cancellation measures, the manufacturers and exporters in Japan, the United States and the European Union are hurting

During the investigation period, the behavior of exporting a large amount of the products under investigation to China by way of dumping was obtained.

Contained to a certain extent, but the number of dumped imports reappeared at the end of the investigation period

growth trend.

Combined Neoprene in Japan, U.S. and EU, 2017-2021

The capacity is 260,000-280,000 tons; the output is 190,000-210,000 tons, 190-210,000 tons,

180,000-200,000 tons, 150,000-170,000 tons and 170,000-190,000 tons; idle capacity is 5-7 tons respectively

10,000 tons, 50,000 to 70,000 tons, 60,000 to 80,000 tons, 90,000 to 110,000 tons, and 70,000 to 90,000 tons; demand

113,200 tons, 119,600 tons, 131,000 tons, 105,600 tons and

111,500 tons. The data show that during the damage investigation period, Japan, the United States and the European Union

The production capacity is huge and remains relatively stable, and the idle production capacity at the end of the damage investigation period is relatively large and

It showed an overall growth trend, with an increase of 26.03% at the end of the period compared with the beginning of the period. In 2017,

The idle production capacity in 2019-2021 is higher than China's domestic demand in the same period; while Japan,

The combined demand of the United States and the European Union is insufficient, and the overall trend is a fluctuating decline, that is, a large amount of

Production capacity needs to rely on the export market to digest.

China is the world's largest neoprene consumer market. 2017 to 2021

In 2009, the demand in the Chinese market showed an increasing trend, with a cumulative increase of 41.24%. in Japan,

With a large amount of spare capacity in the United States and the European Union, the growing demand for China

The Chinese market has the potential for neoprene producers and exporters in Japan, the United States and the European Union

Strong appeal is its important target market. The survey results showed that in the

In the face of anti-dumping measures, Japanese, US and EU producers are still dumping

Export neoprene to China by way of sales. Therefore, if anti-dumping measures are terminated,

In order to absorb its idle capacity, it relies heavily on export markets from Japan, the United States and

Neoprene from the European Union may continue to enter the Chinese market at dumping prices. at the same time,

With the termination of anti-dumping measures, the above-mentioned dumped imports are likely to be sold at lower prices.

If the country enters the Chinese market, the volume of dumped imports may increase substantially.

2. The possible impact of dumping imported products on the price of similar products in the domestic industry

Influence.

The investigation agency determined in the No. 23 Announcement of 2005 that it originated in Japan,

Neoprene in the United States and the European Union has had a significant impact on similar products in the domestic industry

inhibition.

In this reexamination, the applicant claims that the product under investigation is not the same as the domestic similar product

The physical and chemical properties of the product, production process, product use, sales

Channels and customer groups, product substitutability, consumer and producer evaluation, etc.

The surfaces are basically the same, there is no substantive difference, and they are similar and comparable, Can replace each other and have a competitive relationship. In this review investigation, no favorable Interested parties submit comments on this, and there is no evidence that the above conditions have occurred Variety.

Chlorine imports originating in Japan, the United States and the European Union from 2017 to 2021

The average import price of butadiene rubber is 4234.68 US dollars / ton, 4776.21 US dollars /ton, \$4798.3/ton, \$4528.49/ton and \$4687.09/ton.

Among them, the increase in 2018 was 12.79% compared with 2017, and the increase in 2019 was higher than that in 2018.

Increased by 0.46%, in 2020 decreased by 5.62% compared with 2019, in 2021 compared with 2020

Up 3.50%. Import price in RMB adjusted by current exchange rate and import tariff

The prices are respectively 30711.06 yuan/ton, 33947.29 yuan/ton, 35574.37 yuan/ton

ton, 33588.11 yuan/ton and 32505.18 yuan/ton. Among them, compared with 2017 in 2018

An annual increase of 10.54%, an increase of 4.79% in 2019 over 2018, and an increase of 2020 over 2019

The annual decrease is 5.58%, and in 2021 it is 3.22% lower than in 2020. During the damage investigation period,

The prices of dumped imported products rose first and then fell, showing an overall upward trend. In 2021

An increase of 5.84% over 2017.

From 2017 to 2021, the prices of similar products in the domestic industry are

22300-27500 yuan/ton, 24300-30100 yuan/ton, 22300-27500 yuan/ton

tons, 21600-26700 yuan/ton and 24500-30300 yuan/ton. Among them, 2018

An increase of 9.21% compared with 2017, a decrease of 8.02% in 2019 compared with 2018, and a decrease of 8.02% in 2020

Compared with 2019, it will decrease by 3.22%, and in 2021, it will increase by 13.32% compared with 2020. damage

During the hazard investigation period, the prices of similar domestic products fluctuated significantly, with a slight overall growth, 10.18% in 2021 compared to 2017.

The investigation agency believes that the chloroprene rubber market is a fully competitive market, and the imported

There is no substantial difference between products, imported products and similar products in the domestic industry,

Price is one of the important means for it to compete in the Chinese market. Available evidence suggests that

The price of dumped imported products and the price of similar products in the domestic industry are within the damage investigation period.

The trend of domestic changes is generally consistent, with a certain degree of linkage, and the dumping of imported products

The price is always higher than the price of similar products in the domestic industry, and both appeared in 2018

Significant rise, 2019-2021 after price volatility, damage survey period end prices

The average increase was higher than that at the beginning of the damage investigation period.

Therefore, the dumped imported product is different from the domestic industry in terms of physical characteristics and

Chemical properties, production process, product use, sales channels and customer groups,

Product substitutability, consumer and producer evaluation, etc. are basically the same.

There are mutual competitions in China's domestic market, and the competition conditions are basically the same.

same. After review, the investigation agency believes that there is no evidence to show that the current and future

The above competition conditions will change in a period of time, and the price factor is dumped imports

An important means for products to compete for market share with similar products in the domestic industry. in implementation

In case of anti-dumping measures, Japanese, US and EU producers, exporters

Neoprene is still exported to the Chinese market by way of dumping. Therefore, if terminated

Anti-dumping measures, manufacturers and exporters in Japan, the United States and the European Union are trying to digest their

A large amount of idle production capacity is likely to continue or re-use dumping methods to further obtain

gain the Chinese market, and may have an adverse impact on the prices of similar products in the domestic industry.

(3) Comments from interested parties.

1. Regarding the possibility of the damage continuing or reoccurring.

Arlanxeo Germany GmbH asserts in its comments that the applicant provided

11 of the 15 economic indicators in the survey showed that China's domestic industry is rebounding.

Continuous growth and development during the period of dumping measures, the domestic industry does not exist due to imports

Substantial damage caused by the product under investigation.

The applicant claims that the import of the product under investigation is very dependent on the Chinese market, and the

The Chinese market has huge influence; during the implementation of anti-dumping measures, the domestic industry

Some of the key economic indicators of products performed poorly, showing that they are suffering from import adjustments.

investigation of product dumping damage; anti-dumping expiry review investigation is to cancel the anti-dumping

Possibility of continuation or reoccurrence of damage to domestic industry after cancellation measures.

The investigation agency believes that the anti-dumping expiry review investigation is to investigate if

Cancellation of anti-dumping measures, dumping and damage is likely to continue or reoccur. No.

First, as mentioned earlier, under the relief of anti-dumping measures, the domestic industry does receive

A certain degree of recovery and development. However, during the damage investigation period of this review, the state

The output growth of similar products in the domestic industry is lower than the growth rate of production capacity, and the operating rate is generally in the

The downward trend, the production capacity has not been effectively utilized, the inventory at the end of the period has increased significantly, and the pre-tax

Both profits and investment yields have fallen sharply, and cash flow from operating activities has fluctuated greatly.

It will be a net outflow in 2019-2021. The situation in the domestic industry shows that its production

The operating and financial conditions are still unstable, and the ability to resist risks is relatively weak.

There is no evidence that these factors will change in the future. Second, the relevant evidence table

It shows that the neoprene producers and exporters in Japan, the United States and the European Union have strong

export capacity, and the idle capacity is relatively large, showing a growing trend, the products available for export

It can account for a relatively high proportion of total production capacity and has a strong ability to expand exports. third,

The Chinese market is an important target market for chloroprene rubber in Japan, the United States and the European Union.

The demand is on the rise, and the Chinese market is interested in the production of neoprene from Japan, the United States and the European Union.

Producers and exporters have a strong appeal. During the damage investigation period, in the

In the case of dumping measures, neoprene producers in Japan, the United States and the European Union and

Exporters are still exporting to the Chinese market by way of dumping, and account for China's total imports

almost the entire share of the volume exported, it is reasonably foreseeable that if anti-dumping measures were lifted

measures, the volume of dumped imports may increase substantially. Fourth, if the anti-dumping is terminated

Dumping measures, which can release capacity at any time, and may continue to obtain

In China's domestic market, the quantity of dumped imported products may increase substantially, leading to

Deterioration in the profitability and financial condition of domestic industries.

## 2. Regarding the influence of other factors.

Arlanxeo Deutschland GmbH argues in its review that, from the perspective of causality

From a perspective, even if the applicant's individual economic indicators have declined during the anti-dumping measures

The decline is also attributed to factors other than imports of the products under investigation, such as

Environmental issues, the temporary adjustment phase of the production period, the impact of the new crown pneumonia epidemic, and

And the self-adjustment of the price of similar domestic products.

The claimant asserts that ARLANXEO DE GERMANY GROUP denies that the domestic industry is concerned with

the causal relationship between the poor performance of the economic indicators and the import of the product under investigation, and

It is untenable to attribute the cause to factors other than the import of the product under investigation

foot. The main environmental protection investment of the domestic industry occurs in the project construction stage, and the damage adjustment

During the investigation period, the investment was small and did not have a major impact on the company's profits; Shanxi Huojia

During the relocation stage of Changhua Company, the original customers were not lost, and the original inventory continued to be sold.

And the device adopts mature technology and equipment to achieve the design in a relatively short period of time

load, and achieved long-term operation; the company exaggerated the impact of the new crown pneumonia epidemic on the country

The influence of the domestic industry, the influence of the market on domestic indicators is the main factor;



Prices of such products are passively adjusted rather than self-adjusted.

The investigation agency believes that the anti-dumping expiry review investigation is to investigate if

Cancellation of anti-dumping measures, dumping and damage is likely to continue or reoccur. No.

1. During the damage investigation period, the environmental protection costs of domestic industries accounted for 1% of the total sales of similar products

The proportion of business costs remained stable at between 2% and 8%.

Now the cost of environmental protection has increased significantly, and the expenditure on environmental protection has not had a substantial impact on the profitability of the enterprise.

sexual influence. Second, the relocation of the old equipment of Shanxi Huo Changchang Chemical Co., Ltd.

The original sales channels and markets, the amortization expenses are within a reasonable limit, and the company's economic indicators

The trend of most of the indicators in the bid is better than those not affected by the factors of the production period

Another applicant company, Shanna Synthetic Rubber Co., Ltd., regarding the factors of the production period for the company

The claim of negative impact is not established. Third, Arlanxeo Germany GmbH

Claims about the decline in China's domestic industrial economic indicators caused by the new crown pneumonia epidemic

Lack of supporting evidence. From the data point of view, the domestic industrial economic indicators in 2019

The loss in 2020-2021 is more serious than that in 2020-2021 after the new crown epidemic, and the domestic industry situation

worse. Fourth, Arlanxeo Germany Co., Ltd.'s domestic prices of similar products

The claim of self-adjustment of personality lacks supporting evidence. As mentioned earlier, Chinese neoprene

The rubber market is a fully competitive market, and price is an important means of market competition.

The prices of similar domestic products and import prices of chloroprene rubber during the damage investigation period were all equal.

The overall trend is upward, and the changes of the two have a strong linkage. Fifth, its

Other factors may have a certain impact on the production and operation of China's domestic industries, but they do not

It cannot be denied that China's domestic industry is still unstable in production and operation, and its ability to resist risks

weaker state. If the anti-dumping measures are terminated, originating in Japan, the United States and the European Union

of dumped imports may continue or re-dump to obtain Chinese domestic

market, the volume of dumped imports may increase significantly and have a negative impact on China's domestic production

The price of similar products in the industry will be adversely affected.

3. Regarding the public interest.

Arlanxeo Deutschland GmbH argues in its comments that the continuation of the

Taking anti-dumping measures against the investigated products will have a negative impact on China's domestic neoprene rubber industry and downstream

adverse impact on the industry, and taking measures would be contrary to the public interest.

The applicant claims that the domestic chloroprene rubber production enterprises stand in favor of the whole

The height of the development of the upstream and downstream industrial chains, planning and adjustment of production and operation strategies

In terms of product supply, quality improvement, variety improvement, resource protection and price maintenance

Great efforts have been made in protection, and the development of downstream enterprises has been supported to the greatest extent, forming a

It has become a development pattern of harmony, win-win and mutual benefit.

After review, the investigation agency believes that, first, ARLANXEO Germany Co., Ltd.

In its comments, it is pointed out that the continued imposition of anti-dumping duties is not in line with the Chinese public opinion.

Claims of interests, but did not submit relevant evidentiary materials to prove their claims. No.

Second, the implementation of anti-dumping measures is not to prohibit the import of the product under investigation, but to correct

Unfair trade practices caused by dumping imported products, the investigation shows that if the

Anti-dumping measures against imports of neoprene originating in Japan, the United States and the European Union

Chinese dumping may continue or reoccur, and exports to China may be substantial

The increase will further have a negative impact on the prices of similar products in the domestic industry.

Injury suffered by domestic industry may continue or recur. continue with findings

Taking anti-dumping measures will help maintain a fair trade environment and stabilize the domestic market

Market order, let the price return to a normal and fair level, is conducive to the Chinese industry

and the recovery and development of related industrial chains are in line with the long-term interests of downstream enterprises.

Attachment: Data Sheet for Expiry Review Case of Chloroprene Anti-dumping

attached

Chloroprene rubber anti-dumping expiry review case data table 2017-2018 China's total output of the

(10,000 tons)	project (10,000 tons) 2.4-3.0	change rate demand	2019	2020	2021
change rate of imports of products under investigation (10,000 tons) change		4.1-5.2	3.8-4.7	4.1-5.2	4.7-6.0
rate of	-	69.99%	-8.09%	8.98%	15.64%
products under investigation	4.68	6.41	5.68	5.97	6.61
imports Price	-	36.75%	-11.34%	5.11%	10.73%
(US\$/ton) Rate of change RMB price of the product under investigation	2.07	1.92	1.56	1.53	1.74
(yuan/ton) Rate of change 44.24% market share of the product	4234.68	4776.21	4798.3	4528.49	4687.09
under	-	12.79%	0.46%	-5.62%	3.50%
investigation Change (percentage point) Capacity (10,000 tons)	30711.06	33947.29	35574.37	33588.11	32505.18
Rate of change	-	10.54%	4.79%	-5.58%	-3.22%
Operating rate		30.01%	27.49%	25.64%	26.36%
	-	-14.23%	-2.52%	-1.85%	0.72%
	2.4-3.0	5.1-6.4	5.3-6.7	5.4-6.8	5.6-7.0
	-	112.53%	4.38%	0.54%	3.33%
	90%-105%	71%-89%	62%-78%	68%-85%	76%-95%
Change (percentage points)	-	ÿ-25ÿ-ÿ-15ÿ	ÿ-15ÿ-ÿ-5ÿ	0-10	5-15
Domestic sales volume (10,000 tons) 2.2-2.9 Change		3.9-4.9	3.6-4.5	3.9-4.9	4.3-5.4
rate	-	70.37%	-6.77%	7.44%	9.87%
48%-61% market share of similar products Change		61%-76%	63%-79%	65%-81%	64%-80%
(percentage point)	-	10-20	2-8	1-6	(-5)-0
Sales price (yuan/ton)	22300-27500 24300-30100 22300-27500			21600-26700	24500-30300
Change rate	-	9.21%	-8.02%	-3.22%	13.32%
Sales revenue (100 million yuan)	5.7-7.1	10.6-13.2	9.1-11.4	9.5-11.8	11.8-14.7
Change rate		86.06%	-14.25%	3.98%	24.51%
Pre-tax profit (10,000 yuan)	(-800)-(-600) 1200-1400		(-21000)-(-19000)	(-11000)-(-9000)	(-9000)-(-7000)
rate of change	-	-	-	reduction 51.79%	reduction 17.60%
return on investment	(-0.5)%-(-0.3)%	0.6%-0.8%	(-13.0)%-(-10.5)%	(-6.6)%-(-5.3)%	(-5.4)%-(-4.3)%

Change (percentage	-	-	-	5-10	0-5
points) Net cash flow (10,000 yuan)	11000-14000	4900-6200	(-3800)-(-2 600)	(-6000)- (-4800)	(-5800)-(-45 00)
rate of change	-	-55.38%	-	Cash outflow increased by	Cash outflow decreased by 5.06%
Ending inventory (tons)	280-350	670-840	980-1200	74.89% 2400-2900	6300-7000
Change	-	138.31%	46.74%	143.42%	153.56%
rate Number of employees (person)	1000-1400 Change	1300-1600	1200-1500	1100-1400	1100-1400
rate Per	-	23.06%	-9.37%	-8.93%	-0.43%
capita salary (10,000 yuan/year/ person)	4.7-5.8	5.3-6.5	5.8-7.2	6.4-7.9	6.9-8.6
Change rate Labor productivity (ton/ year/person)	20-27	28-35	30-37	37-46	44-55
Change rate	-	38.14%	1.41%	19.66%	16.14%