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Case Study

China's Anti-Dumping Investigation on Pork Imports from Europe: A Calibrated Retaliation

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Abstract

This case study explores China's ongoing retaliation against the EU through an anti-dumping investigation of EU pork, after the EU conducted an anti-subsidy investigation into Chinese-produced electric vehicles (EVs). China's pork probe aimed to sway key EU Council votes on EV tariffs, targeting Spain as the largest pork exporter—especially of offal, which is difficult to export elsewhere. Furthermore, China considered Spain particularly vulnerable to its influence because of its ambition to receive investment from China into green technology sectors, including EV and battery factories. We find this case instructive, as a continuation of China's policy to pit the economic interests of EU Member States against one another, with negative consequences for the EU's overall leverage. A policy recommendation to be drawn from this case study is for the EU to build internal protection against Member States playing against EU-level interests in trade and investment.

Keywords: Economic statecraft, economic coercion, trade retaliation, anti-dumping, trade defense instruments, geoeconomics, European Union, China
JEL Classification: F13, F51, F52

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1. Introduction

Context and stakes

In September 2023, the European Commission initiated a probe into China's distortive subsidization of its increasingly dominant electric vehicle (EV) sector, applying provisional duties in June 2024, and definitive duties in October 2024 (Grieger 2023; EU Commission 2024). In response to the EU's provisional duties, China embarked on several anti-dumping investigations against the EU, first of pork, then dairy products, and accelerated a previous investigation into dumped EU brandy and cognac. While China formally justified the investigation as a trade-remedy proceeding, this case study interprets its timing, sectoral targeting, and diplomatic context as indicative of a broader strategy of calibrated economic retaliation. The anti-dumping investigation into EU pork and pork byproducts was launched on June 17, the very next week after the EU applied provisional duties on Chinese EVs, raising immediate concerns of retaliation or, to put it mildly, a tit-for-tat dynamic (MOFCOM 2024). This article focuses on China's anti-dumping investigation into EU pork because it opened the door to other cases and because of its targeted nature. The sequence of this case study is as follows. Part 2 traces the sequence of events leading up to China's retaliation and the mechanics of its unfolding actions. Part 3 explores China's choice of pork as the subject of an anti-dumping investigation, Part 4 examines lobbying, and Part 5 gauges political and commercial impacts.

2. Sequence and Mechanics of Chinese Retaliation

China's anti-dumping investigation into European pork was widely perceived as retaliation against the EU's investigation into EVs produced in China. Therefore, we first examine the trigger of China's retaliation, then China's targeted reaction, thereby contextualizing the dynamics at play between the two parties and the consequences – intended or unintended – of China's retaliatory investigations. See Table 1 for key events leading up to China's retaliatory investigation against the EU.

Trigger: EU anti-subsidy measures against Chinese EVs

In September 2023, EU Commission President Ursula von der Leyen announced an anti-subsidy probe into China's EV sector, claiming that global markets had been "flooded" by Chinese EVs whose price had been kept artificially low (von der Leyen 2023). Provisional duties – namely countervailing duties – were applied to Chinese EVs in June 2024 after the year-long investigation concluded that Chinese EV producers benefited from extensive subsidies distorting competition in the EU auto market. The Commission's investigation relied on cooperation from Chinese

EV producers to determine the extent of their subsidization, and investigators were met with varying degrees of forthrightness from EV firms.

TABLE 1. Timeline of events

Date	Event	Significance
September 13, 2023	EU launches anti-subsidy probe into Chinese EV sector.	To China, this is the casus belli for retaliation.
June 12, 2024	EU reaches provisional conclusions on unfair Chinese state subsidies for EVs.	Chinese EVs subject to between 17%–38% duties on top of 10% import duty.
June 17, 2024	China MOFCOM launches anti-dumping probe into EU pork	Perceived as tit-for-tat retaliation.
October 29, 2024	EU imposes definitive tariffs on Chinese EVs.	Disunity among Member States came to the fore during voting process.
November 6, 2024	China lodges dispute complaint against EU at the WTO for EV tariffs.	Both China and EU claim to respect WTO rules and abide by its decisions.
June 10, 2025	China MOFCOM extends anti-dumping probe into EU pork until December 2025.	Extends Chinese leverage over trade discussions with EU.

Note: The timeline identifies selected events most relevant to the case analysis and is not intended to be exhaustive. The "Significance" column reflects the authors' interpretation of each event's relevance to the EU–China trade dispute.

Source: Authors' compilation and analysis based on official documents and sources cited in the article.

In the EU, countervailing and anti-dumping duties are implemented according to a two-stage process. The European Commission can impose provisional countervailing duties lasting up to four months during an investigation into alleged subsidies or dumping. However, converting these into definitive measures, which normally remain for five years, requires a formal decision from the EU Council, where Member States vote under a qualified-majority-like rule. Only a blocking majority representing at least 55% of Member States and 65% of the EU population can prevent a measure from being adopted. This mechanism ensures that trade defence measures with longer-lasting effects carry both executive and political backing.

3. China's Response: Anti-Dumping Investigation into EU Pork – A Perfect Retaliatory Tool

Just days after the EU imposed provisional duties, China's Ministry of Commerce announced an anti-dumping probe into EU pork and pork by-products (including fresh/frozen meat, and offal). The investigation followed a complaint from the state-owned China Animal Agriculture Association Group, alleging dumping margins above 60%, provoking substantial economic losses among Chinese producers. The investigation covered pork products dumped in 2023 and was initially carried out over a year, before being extended for an additional six months, to December 2025 (MOFCOM 2025). China has yet to impose provisional duties based on preliminary findings, but reserves the right to act in the future. While officially justified as combating deflation (He 2025), state-linked outlets framed the probe as retaliation against EU EV tariffs. State-sponsored media outlet *The Global Times* highlighted that the move followed on the heels of EU EV tariffs and framed it as a protective response (Wang and Qi 2024). It noted that MOFCOM's emphasis that China "will resolutely take all necessary measures to firmly defend the legitimate rights and interests of Chinese companies".

China's main pork suppliers are Spain, Brazil, the US, Denmark, and Canada. Figure 1 illustrates that these five countries made up the lion's share of China's pork imports since at least 2021, and Brazil's share has increased substantially, briefly

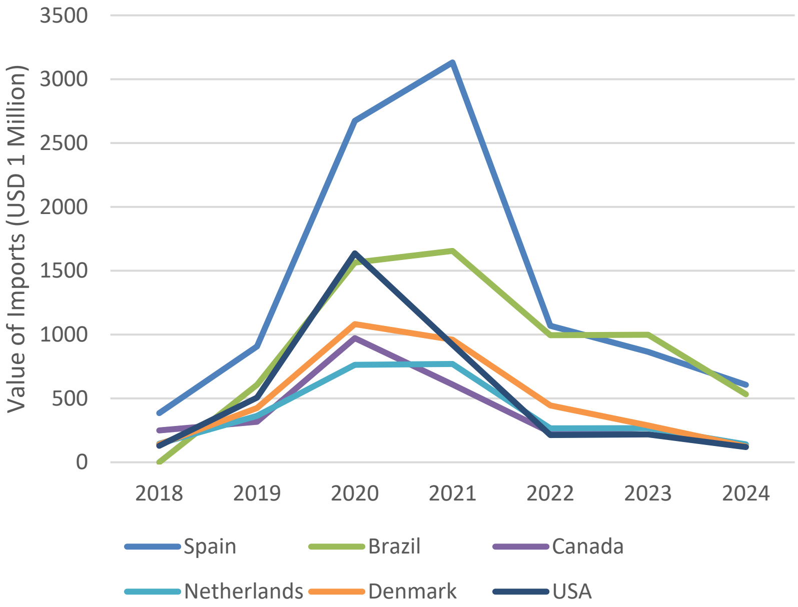

FIGURE 1. China Top Pork Meat Import Sources (2018–2024)

Source: Authors' visualization based on UN Comtrade data.

overtaking Spain in 2023. However, Figure 2 illustrates that imports of pork offal – delicacies such as snout, ear, and tongue – are primarily sourced from the US, followed by Spain and, to a lesser extent, the Netherlands, Denmark, and France. Together, EU countries supplied over 50% of China's pork imports in 2023, worth over EUR 2.2 billion, and China consumed over 67% of Spain's pork offal exports. This dynamic makes European pig farmers vulnerable to trade disputes with China, particularly for pork offal, which has relatively few consumers worldwide. While China has yet to impose countervailing duties to protect its market from alleged EU dumping of pork, Figure 3 illustrates that EU pork has steadily fallen as a share of China's total pork imports, while Figure 4 illustrates that Chinese offal imports have remained more consistent since 2018. Critically, China's anti-dumping investigation was announced on the heels of large-scale farmer protests across Europe, where tractors swarmed Madrid and other European capitals in March 2024 over shrinking profits, heavy costs, and burdensome regulations (Chislett 2024). As one of the EU's largest pork meat and offal exporters, Spain was key to China's retaliatory strategy. Spain had voted in support of tariffs against Chinese EVs in an interim vote at the EU Council held on July 16, 2024, and as the fourth most populous country in Europe, it holds significant sway in the creation of China's hoped-for blocking majority in the Council voting process.

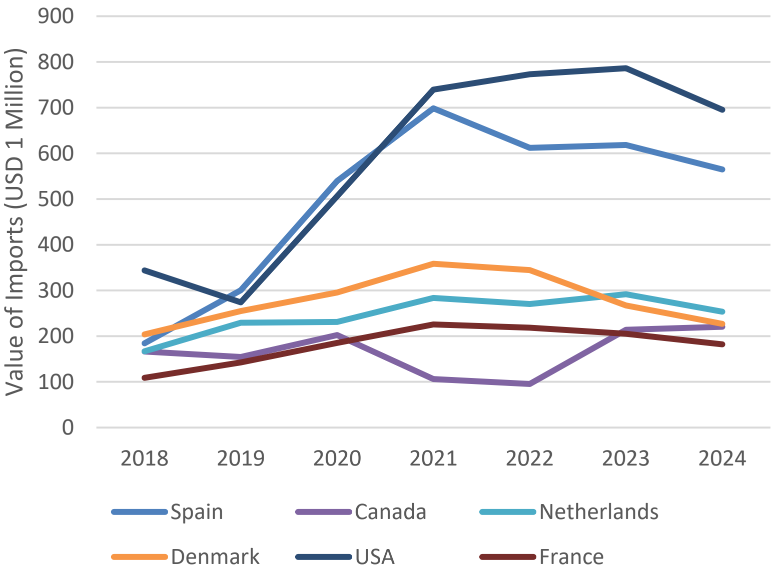

FIGURE 2. China Top Pork Offal Import Sources (2018–2020)

Source: Authors' visualization based on UN Comtrade data.

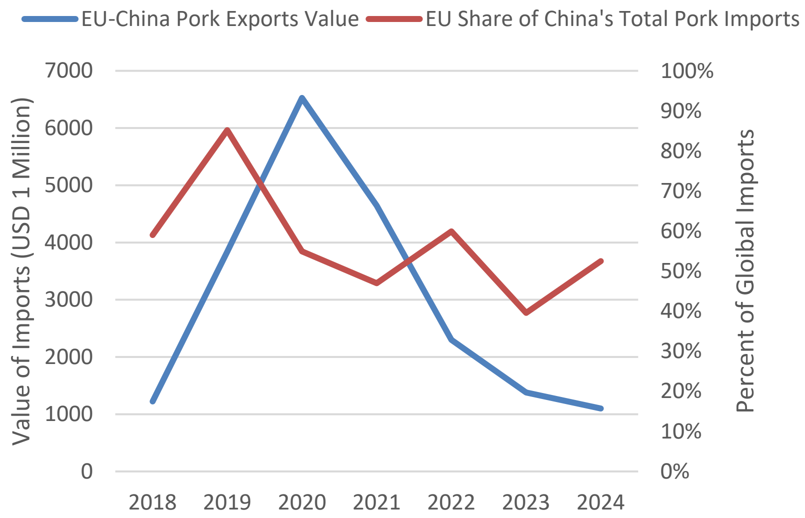

FIGURE 3. China's pork imports from the EU and EU share of China's total pork imports, 2018–2024

Note: The EU share of China's total pork imports is shown on the right-hand axis.

Source: Authors' visualization based on UN Comtrade data.

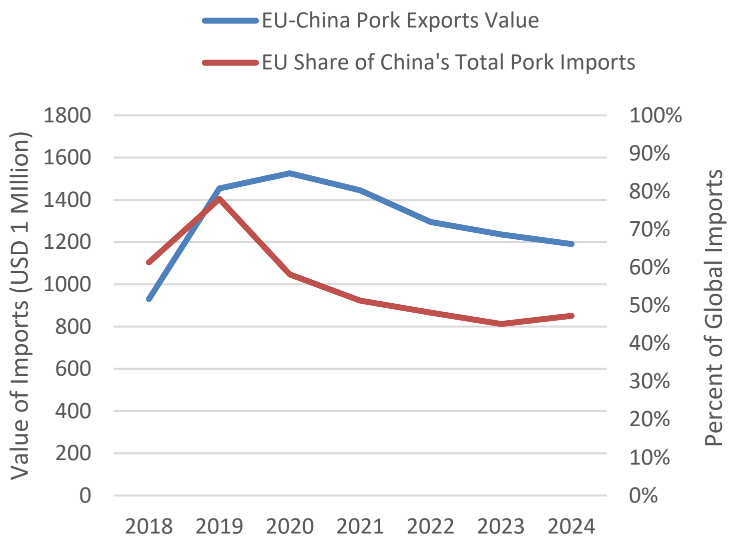

FIGURE 4. China's pork offal imports from the EU and EU share of China's total pork offal imports, 2018–2024

Note: The EU share of China's total pork offal imports is shown on the right-hand axis.

Source: Authors' visualization based on UN Comtrade data.

Not only is Spain an influential vote in the EU Council, but it is also an economic juggernaut among peers with low economic growth. The EU's largest economies of Germany, France and Italy are either in recession or growing no more than 1.2% per year. Spain, on the other hand, grew 3.2% in 2024 and is a large recipient of Chinese Foreign Direct Investment (FDI). Greenfield investments from China's CATL battery maker are planned in Zaragoza, while Chinese green hydrogen maker Hygreen is set to partner with Spanish firm Coxabengoa for expanded green hydrogen production (Hygreen Energy 2024; CATL 2024). In the context of a sensitive agricultural sector, promised Chinese investment, and procedural influence on EU policymaking, Spain was a perfect pressure point. While China knew that Germany would vote against EV duties as its own China-made autos would suffer, Spain needed to be swayed. Table 2 presents potential impacts of Chinese retaliation, which remain ex-ante as tariffs have not yet been imposed.

TABLE 2. Potential (Ex-Ante) Impacts of Chinese Retaliation

Sector	Potential Impact
EU-China Pork Exports	EUR 2.2 billion (2023)
Spain-China Pork Offal Exports	EUR 530 million (2023)
Spanish FDI from China	EUR 6.2 billion (planned)
Total Retaliatory Capacity	EUR 8.930 billion

Source: Authors' compilation based on sources cited in the article.

Broader Escalation: Dairy, Brandy and More

In August 2024, China initiated another anti-subsidy investigation, this time into EU dairy products, thereby escalating the trade tit-for-tat beyond pork and into sectors significant to the economies of France, the Netherlands, and Germany. In the same month, China also published preliminary results from a previous anti-dumping investigation into EU brandy, finding that EU brandy had dumping margins of 30.6% to 39% (China Trade Remedies Information 2024). A tariff-like system was consequently imposed in October 2024. Finally, China's MOFCOM heard opinions and suggestions from industry and academic experts on tariffs for autos with large-displacement engines – such as luxury German autos (MOFCOM 2024), stoking fears that Chinese retaliation may expand even further.

European voting signals and China's further actions

In July 2024, shortly after the European Commission imposed provisional countervailing duties on Chinese EVs, it conducted a non-binding advisory vote among

EU Member States to assess political support for definitive tariffs. This voluntary vote was not legally required but served as a gauge of the EU's internal unity. The outcome revealed a split: 12 Member States supported the tariffs, including France, Italy, and Spain, while 4 opposed them and 11 abstained, including Germany – a key auto maker whose cars manufactured in China would suffer from tariffs (Roberts 2024). The advisory vote highlighted concerns about the potential impact on European auto industries and signalled that while there was significant backing for trade defence measures, the Commission lacked unanimity.

Results influenced both the Commission's strategy and broader political dynamics. The vote provided leverage in negotiations with China by demonstrating partial EU unity while leaving room for diplomatic engagement. Meanwhile, divisions fueled media narratives about EU discord and intensified lobbying efforts from automotive stakeholders and from China.

4. Lobbying

Lobbying was an essential part of China's strategy to influence the EU Council's final vote on EV tariffs. EU governments and companies did their own lobbying, sometimes in response to China's retaliation and, in some cases, because of the impact EV tariffs would have on their business producing EVs in China. This section explores two strands of lobbying against EV tariffs, namely Chinese and EU lobbying.

Chinese lobbying

Before the EU Council's final vote in October 2024, China intensified its lobbying efforts to oppose EV tariffs through targeted diplomatic engagement. Notably, on September 17, 2024, Chinese Minister of Commerce Wang Wentao visited Berlin and Brussels, meeting with German Economy Minister Robert Habeck and European Commission officials to express Beijing's strong opposition (MOFCOM 2024). Wang warned that such tariffs could provoke retaliatory actions, citing China's own anti-dumping investigation launched in June 2024 into EU pork imports as a countermeasure. China also conducted outreach to individual Member States, hoping to drive a wedge within the EU and delay or weaken decision-making. More generally, the number of actors involved in China's lobbying on this specific case was very large, in line with the importance of the case, namely the first ad-hoc tariffs imposed by the EU, with many other cases under investigation. Tables 3 and Table 4 list the central actors involved in the EU's investigation against Chinese EVs, Chinese retaliation, and lobbying.

TABLE 3. Institutional Actors

Actor	Significance
China Ministry of Commerce (MOFCOM)	Institution conducting anti-dumping probes.
China Ministry of Foreign Affairs (MOFA)	Main interlocutor for international affairs.
EU Commission	Executive body launching anti-subsidy probe.
EU Council	Member States' ministers voting on tariffs.
Directorate General for Trade and Economic Security (DG Trade)	Institution conducting anti-subsidy probe.
World Trade Organization (WTO)	International mediator of trade.
Verband der Automobilindustrie (VDA)	Lobby group for German auto industry.
China Animal Agriculture Association Group	China state-owned interest group for animal husbandry.
Spanish Inter-Professional Agri-Food Organization for White Pork	Lobby group for Spanish pork producers.
Danish Agriculture & Food Council	Lobby group for Danish pork producers.

Note: The table identifies selected institutional actors most relevant to the case analysis and is not intended as an exhaustive institutional mapping.

Source: Authors' compilation and analysis based on official institutional sources and sources cited in the article.

European lobbying

After the announcement of China's anti-dumping investigation into EU pork, Spanish and Danish associations of pork producers issued statements warning of their significant exposure to China (DAFC 2024; Interporc 2024). In the coming months, a flurry of diplomatic consultations unfolded. Just before voting on definitive tariffs for Chinese EVs, Spanish President Pedro Sánchez met Chinese President Xi Jinping in Beijing and stated that a trade war must be avoided (MOFA 2024).

German automakers lobbied against tariffs, citing risks to supply chains, costs, and competitiveness. Working closely with the German government, they argued that tariffs would disrupt EU-China trade, hinder EV adoption, and jeopardize climate goals. Through industry associations like the Verband der Automobilindustrie (VDA) and public campaigns, they highlighted potential job losses and investment slowdowns within Europe, advocating for open trade and international cooperation on green technologies (VDA 2024).

TABLE 4. Individual Actors

Actor	Affiliation	Position
Ursula von der Leyen	European Commission and European People's Party	Commission President and EPP Vice President (ex officio)
Xi Jinping	Chinese Government and Chinese Communist Party (CCP)	President and CCP General Secretary
Pedro Sánchez	Spanish Government and Socialist Workers' Party	President and Party General Secretary
Zhao Leji	Chinese Government and Chinese Communist Party (CCP)	Congress Standing Committee Chairman and Politburo Standing Committee Chairman
Han Zheng	Chinese Government and Chinese Communist Party (CCP)	Vice President and Politburo Standing Committee Member
Wang Wentao	Chinese Government and Chinese Communist Party (CCP)	Minister of Commerce and Central Committee Member

Note: Positions refer to roles held during the period examined in the article. The table identifies selected individuals most relevant to the case analysis and is not intended as exhaustive.

Source: Authors' compilation based on official biographies, institutional records, and sources cited in the article.

5. Outcomes and Impacts

Between the July 2024 advisory vote and the October definitive Council vote on Chinese EV tariffs, several factors prompted a shift in Member States' positions. The non-binding advisory vote reflected initial hesitations, with several countries abstaining over economic and diplomatic concerns. In the ensuing months, the European Commission intensified diplomatic outreach, providing detailed impact assessments and assurances aimed at addressing concerns about supply chain disruptions and competitiveness. Simultaneously, mounting pressure from key industries and political stakeholders underscored the need to protect EU manufacturers from unfair subsidies, bolstering support for definitive measures.

The total vote tallies on the tariffs' advisory motion were confidential, and only a few country positions were publicized. While this makes comparison to the full vote tallies of the advisory motion impossible, certain positions are noteworthy. Most importantly, Spain shifted from supporting duties in the advisory vote to abstaining from the definitive motion, while Germany shifted from abstention to voting against tariffs (Tosiani 2024).

Rippling effects

After the definitive vote, China continued deploying significant diplomatic resources to reach a compromise before they took effect. In a last-ditch effort, China proposed a minimum sale price, which the European Commission rejected. Technical talks continued for a "price undertaking" mechanism, and throughout, Beijing paired legal and trade actions with political outreach, leveraging allies within the EU while pressing for a resolution that would soften or reverse the new duties.

Diplomatic actions continued even after tariffs took effect, particularly vis-à-vis Spain. In fact, the Chairman of China's Politburo Standing Committee, Zhao Leji, visited Madrid on November 23, to seek a solution which the Spanish government supported. President Sánchez returned to Beijing in April 2025, barely six months after his last visit, and returned with a number of protocols signed, including expanded access to China's market for pork, cherries, and fast-tracked access to the export licenses for China's rare earths. Finally, Vice President Han Zheng visited Madrid only two months later to sign several agreements in green energy and investment. These included a USD 4.1 billion joint venture between CATL and Stellantis on an EV battery factory in Zaragoza, a EUR 2.5 billion deal for green hydrogen projects in Andalusia, and a smaller USD 75 million deal for an automated, solar-powered car terminal at the Port of Barcelona. Han's visit coincided with a six-month postponement of a contentious Chinese anti-dumping inquiry into EU pork – a relief for Spain.

Beyond targeted diplomatic efforts, China challenged EU tariffs on other fronts. It lodged a formal complaint with the World Trade Organization, arguing that EU duties violate trade rules (WTO 2024), and imposed a tariff-adjacent system of security deposits for EU brandy and cognac (MOFCOM 2024). Meanwhile, the investigation on dairy products was recently extended to February 2026. Furthermore, several Chinese EV makers, including SAIC, BYD, and Geely, as well as European manufacturers producing in China like BMW, filed legal challenges before the Court of Justice of the EU, disputing both subsidy calculations and injury findings used to justify tariffs (Blenkinsop 2025).

6. Policy Recommendations and Conclusions

EU-China EV talks are ongoing, and the extension of China's anti-dumping probe has synchronized negotiation timelines such that they will likely play out in relation to one another. While analysts believe a wholesale reduction in EV tariffs is unlikely, China might leverage anti-dumping probes like pork, dairy, and brandy to move from punitive tariffs collected by the EU to voluntary price undertakings where China sets an EV price floor in consultation with the Commission.

Broadly, this case illustrates the growing risk of Chinese retaliation against the EU. Its anti-dumping probe into EU pork is a surgically precise measure to influence

Spain's position on EV tariffs. On one hand, China threatens a stick over Spain's sensitive agricultural sector, while presenting a carrot of green-tech investment in the other.

Following completion of this manuscript, China issued its final determination in the anti-dumping investigation into EU pork imports in December 2025, imposing definitive duties of 4.9% to 19.8% for five years, substantially below earlier preliminary rates. China also finalised anti-dumping measures on EU brandy imports, with duties of 27.7% to 34.9%, while accepting price undertakings that allow qualifying producers, including major groups such as Pernod Ricard, Hennessy/Moët Hennessy and Rémy Cointreau, to avoid duties where agreed minimum-price conditions are met. In February 2026, China also issued its final determination in the countervailing investigation into EU dairy products, imposing duties of 7.4% to 11.7% for five years. Taken together, these developments reinforce the interpretation advanced in this case study: namely, that the pork investigation functioned not only as a trade-remedy proceeding, but also as part of a broader strategy of calibrated economic leverage in the wider negotiations over EU measures on Chinese EVs. Rather than maximising economic disruption, the measures appear to have exerted targeted pressure on politically influential Member States and firms while remaining below the threshold likely to trigger a unified EU response.

A crucial insight from this case is how fault-lines between EU Member States can be readily exploited, leaving the EU policymaking process fundamentally vulnerable. China's latest trade probes continue a pattern of using anti-dumping and anti-subsidy laws as geopolitical tools rather than technical trade remedies, and the EU remains inadequately prepared to respond.

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