

Trade (Dumping and Countervailing Duties) Act 1988

APPLICATION FOR AN INVESTIGATION TO IMPOSE ANTI-DUMPING DUTIES AGAINST FROZEN POTATO PRODUCTS FROM BELGIUM AND THE NETHERLANDS

August 2020

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1. Introduction

Executive Summary

This application is made on behalf of an industry that is unconcentrated and usually highly contested. Four of the five New Zealand producers (constituting almost xx% [figure] of total production) support the application; [and the fifth does not oppose it]. All those New Zealand producers compete vigorously with each other; and are further constrained by threat of imports. It concerns the threat of material injury to the New Zealand Frozen Potato Industry from dumped frozen potato products originating from Belgium and the Netherlands. Frozen potato products have been imported from Belgium and the Netherlands for a number of years but a significant change of circumstance as a result of the Covid-19 pandemic has resulted in reduced demand for frozen potato products globally, which has resulted in increased available inventories in Belgium and the Netherlands.

This has impacted the frozen potato supply chain of these industries significantly leading to government intervention in Belgium and the Netherlands to assist the industry to mitigate surplus potato raw material. This in turn is being taken advantage of by the frozen potato producers, who are buying raw material at less than 20% of prior market value.

The available inventories and support being received by the industry in Belgium and the Netherlands poses a threat of material injury to the NZ industry and an anti-dumping remedy is required to prevent material injury. The threat is arising from a change in circumstances which is clearly foreseen and imminent. Specifically, there is convincing reason to believe that there will be, in the coming months, increased importation of frozen potatoes from the Netherlands and Belgium at dumped prices with dumping margins increasing as export prices decline.

There are already strong indications increased imports will be shipped to New Zealand in the wake of the downturn in European markets caused by Covid-19 and an associated glut of frozen potato products that need to find a market to make room for the 2020 harvest. This situation is being exacerbated by the ongoing provision of government support to the industry in Europe which allows production to continue.

To provide further context, xx% [figure] of the NZ market for frozen potato products is food service ("hospitality channels") rather than retail. This is significant given that the food service sector has been one of the most affected by Covid-19 and will be so long as countries and regions face resurgence and re-imposition of lock downs. As long as New Zealand maintains relatively low infection rates and trading restrictions on hospitality channels are relatively light and temporary, our market will therefore be especially attractive compared to other export destinations.

Historically, we have seen imports increase significantly following declining export prices. Evidence is available which shows that export prices have collapsed over the past months to a far greater extent than previously. This in turn will lead to significant increase in exports to New Zealand, which in the absence of a trade remedy, will lead to the destruction and closure of the New Zealand Frozen Potato industry.

The forecasted increased imports at dumped prices will cause a threat of material injury to the New Zealand potato industry in the following ways:

- Exporters will have the opportunity to increase export volumes further at lower prices due to current inventory surpluses. In addition, this is being aided by the Covid-19 related government support in the Netherlands and Belgium.

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- Increased imports of frozen fries and wedges at dumped prices will lead to price undercutting, significant price depression, and price suppression, leading to a forecast decline in sales and profits and a threat to the medium to long term stability of the New Zealand potato industry.
- Frozen fries and wedges from the Belgium and the Netherlands are already sold in New Zealand. Therefore existing commercial arrangements and market access exists so it is highly probable that importers will take advantage of cheaper export prices from the Netherlands and Belgium to pass on price savings to the New Zealand market in an effort to increase volume and take market share.

The WTO Anti-Dumping Agreement requires that a threat of injury be based on facts, not merely on allegations, conjecture or remote possibility. Far from being a case of speculation that if imports are cheaper, consumers will buy more imports, the impact of Covid-19 on food service products globally is undisputed fact. As explained above, xx%[figure] of the New Zealand market for frozen potato products is food service (hospitality). This sector has effectively been shut down by government intervention in many markets; and even as economies begin to open, bounce-back will not be swift. One only has to look at the impact of the dearth of tourism globally to see that the hospitality sector will be impacted, and that as a result there must inevitably be a big stockpile of product that is so overwhelmingly concentrated in the sector and has nowhere else to go.

Provisional Duties

In the wake of a clearly foreseeable and imminent change in circumstances which is creating a situation in which dumping will cause material injury, the application of provisional anti-dumping duties is requested, as it is both necessary and appropriate. As is noted at points in this application, the expected further increases owe much to Covid-19 related subsidisation of Dutch and Belgian potatoes, and decreased export prices. While, as in many situations, there is overlap between anti-dumping, subsidisation, and increased imports, **the core of the threat facing the New Zealand industry is a change of circumstances leading to increased capacity of, and incentive for, Dutch and Belgian exporters with surplus inventories leading to increased imports of frozen potato products at dumped prices.** As such, an application for anti-dumping duties and of provisional anti-dumping duties is the appropriate course of action to take.

Grounds for Application

Potatoes New Zealand (PNZ) applies for the initiation of an investigation pursuant to the Trade (Anti-dumping and Countervailing) Act 1988. Specifically, it seeks the imposition of provisional anti-dumping duties and anti-dumping duties to address the threat of material injury to the New Zealand potato industry being caused by a change of circumstances leading to increased imports of frozen potato products at dumped prices originating from Belgium and the Netherlands.

This application is made on the grounds that if the dumped imports are allowed to continue to enter the New Zealand market without the imposition of provisional anti-dumping duties and anti-dumping duties, the New Zealand potato industry will suffer material injury through:

- price undercutting;
- price depression; and
- price suppression,

resulting in:

- a decline in sales,

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- a decline in profits and return on investments,

Longer term impacts of the impairment will be:

- a decline in output and sales,
- a decline in market share,
- a decline in profits and return on investments,
- a decline in utilization of production capacity; and
- adverse effects upon cash flow, inventories, employment, and growth.

Evidence is provided in this application which demonstrates sufficient grounds for an investigation into whether increased dumped imports are causing a threat of material injury.

2. Interested Parties

The Applicant

The applicant is Potatoes New Zealand Inc. (PNZ). PNZ is the industry association representing the interests of the New Zealand potato industry. PNZ became incorporated in 2012 (Incorporated Society Number 2559200).

Potatoes New Zealand
Level 4
Co-operative Bank House
20 Ballance Street
Wellington
New Zealand

Telephone: 0800 399 674

Contact: Chris Claridge (Chief Executive)
Email: chris.claridge@potatoesnz.co.nz

Any queries in regard to this application should be directed to Simon Crampton. For the purposes of the review PNZ is being represented by Simon Crampton, an independent consultant.

e-simoncrampton@xtra.co.nz
p-021730384

The applicants accounting year ends 31st March

The NZ industry produces a range of frozen potato products including frozen fries, wedges and hash browns for sale in the retail and hospitality sectors of the New Zealand market.

3. New Zealand Producers

The industry is unusual in that it is unconcentrated comprising 5 New Zealand producers. It is usually highly contested with those producers competing vigorously with each other and further constrained by threat of imports.

Domestic Producers

McCain Foods (NZ) Limited
1440 Omahu Road
Twyford 4175
Hastings
0800 858 511
Financial Year End xxxxxx[*date*]

Talleys Group Limited
P.O. Box 5
Motueka
03 528 2800
Financial Year End xxxxxx[*date*]

Mr Chips
8 Pukekiwiriki Place
East Tamaki
Auckland 2013
09 274 7598
Financial Year End xxxxxx[*date*]

Makikihi Fries
5 Makikihi Beach Road
Makikihi 7978
03 689 5879
Financial Year End xxxxxx[*date*]

The producers above account for 88% of the industry in New Zealand, which is well above the collective output support levels mandated by statute. The fact that the applicant industry comprises a number of New Zealand producers does not mean that the applications should be subject to closer scrutiny. These producers produce ranges of frozen potato fries and wedges.

There is a fifth producer who is not a member of PNZ and therefore not represented by PNZ. Their details are:

Fresher Foods,
68 Cryers Road,
East Tamaki,
Auckland 2013,
09 274 9801

The New Zealand Producers (NZ Producers) are referenced as a data source across tables in the application. Where this is referenced this is data from the four producers who support the application; McCains, Talleys, Mr Chips and Makikihi Fries.

4. Like Goods

The imported goods are described as:

Frozen potato fries and wedges falling under tariff code 2004100000

The industry produces, as part of its frozen potato product range, frozen fries and wedges.

The goods are currently classified under tariff item and statistical key 2004100000 of the Tariff of New Zealand. PNZ would also assume that under this tariff item are various other frozen potato products including; hashbrowns, mashed potato, potato pom poms\balls, gratins amongst others.

Like Goods Considerations

In identifying like goods, the applicant has used the Ministry's framework in order to determine what goods produced in New Zealand are like goods to the imports.

- (a) Method of manufacture.
- (b) Physical characteristics.
- (c) End use.
- (d) Marketing and distribution channels
- (e) Substitution.

Method of Manufacture

The method of manufacture for the domestically produced goods and the imported goods is the same with potato raw material being washed, peeled (not all), cut, fried, frozen and then packed.

Physical Characteristics

The New Zealand industry produces frozen fries and wedges. The frozen fries and wedges are packaged in either poly bags or cardboard boxes. These frozen fries and wedges are extremely similar, if not identical, to frozen fries and wedges imported from Belgium and the Netherlands currently. In a blind taste test, consumers would not be able to distinguish which was produced in New Zealand and which was produced in Belgium and the Netherlands.

End Use

The New Zealand industry produces frozen fries and wedges for retail and hospitality/food service sale in New Zealand. These frozen fries and wedges have the same function and application as imported frozen fries and wedges, being consumed throughout the foodservice/hospitality industry and by consumers at home.

Marketing and Distribution

The distribution channels, customers and means of advertising are similar for the New Zealand produced frozen fries and wedges and imported frozen fries and wedges.

Evidence is available as Appendix 7, showing a trade presenter for imported product competing with New Zealand produced product. Trade presenters are a common tool for selling in new products, or exceptional deals. Given the imported product uses the same means and channels as New Zealand products suggests the marketing and distribution channels are one and the same and reinforces the end use is also the same.

Substitution

The frozen fries and potatoes produced by the New Zealand industry, if imported into New Zealand, would be classified under the same tariff item and statistical key in the Customs tariff. (Tariff item 2004100000).

Pricing

The frozen potato products produced by New Zealand producers compete at the same price point as the imported frozen potato products. This level of competition is the industries ex-warehouse wholesale price versus the imported ex-wharf cost of imports.

Conclusions Relating to Like Goods

In summary, the frozen fries and wedges manufactured in New Zealand by the producers have the same or similar method of manufacture, physical characteristics, end use, marketing and distribution considerations and tariff classification. There is sufficient evidence for the purposes of an investigation that the frozen fries and wedges produced by the industry are like goods to the imported goods to warrant an investigation.

Evidence is provided in this application, Appendix 11.7, of imported product being directly substituted for New Zealand product proving how similar the imported product is to New Zealand product in terms of End Use, Physical Characteristics and Marketing and Distribution.

New Zealand Market

A summary of the New Zealand market is available in Table 2 below.

Table 2: New Zealand Market

	Tonnes
Total NZ Production	xxxxx
Total NZ Imports	18,855
Total New Zealand Market	xxxxx
Hospitality Channels	xxxxx
Retail Channel	xxxxx

Source: Table 1, Table 3, IRI Retail Scan Data

IRI Retail Scan Data is retail scanned sales for Woolworths, New World and Pak n Save supermarkets for year ending December 2019. The Hospitality Channels data is calculated by subtracting the retail sales from the Total New Zealand Market where total NZ Sales is the sales data provided by the NZ Producers. The NZ Produced Sales data is for year end June 2020 as provided by the NZ industry.

5. Allegedly Dumped Imports

The allegedly dumped imports originate from Belgium and the Netherlands. Evidence of country of origin of frozen potato products available for sale in NZ supermarkets such as xxxxxxxxxxxxxxxxxxxx[customer sensitive information] of frozen fries further supports this assertion.

[customer sensitive images]

Imports for the last 12 months ending April 2020 are available in Table 3 below.

Table 3: Annual Imports of Frozen Potato

Country	Quantity (KG)	Cost including insurance and freight (NZ\$)	Value for duty (NZ\$)	VFD/KG (NZ\$/KG)	Share
Australia	7,607,322	13,827,323	12,930,668	1.70	40.3%
Austria	6,720	16,964	15,058	2.24	0.0%
Belgium	2,165,911	3,951,504	3,584,071	1.65	11.5%
Canada	471,780	1,517,873	1,370,567	2.91	2.5%
China, People's Republic of	189,777	501,468	465,669	2.45	1.0%
Columbia	168	3,781	3,096	18.43	0.0%
France	2,394	21,364	19,409	8.11	0.0%
Germany	7,213	24,815	24,173	3.35	0.0%
India	966,943	1,785,465	1,609,339	1.66	5.1%
Japan	60	809	646	10.77	0.0%
Korea, Republic of	519	11,335	10,816	20.84	0.0%
Lithuania	50	186	177	3.54	0.0%
Netherlands	2,847,867	4,848,774	4,338,240	1.52	15.1%
New Zealand	284,610	440,112	437,411	1.54	1.5%
South Africa	47,694	195,126	182,211	3.82	0.3%
Spain	34,144	95,862	95,622	2.80	0.2%
Taiwan	749	3,118	2,968	3.96	0.0%
Tonga	90	83	65	0.72	0.0%
United Kingdom	396	8,982	7,267	18.35	0.0%
United States	4,220,205	8,941,874	7,630,658	1.81	22.4%
Total	18,854,612	36,196,818	32,728,131	1.74	100.0%

Source: NZ Statistics Infoshare Data 2004100000 year ending April 2020

Infoshare is Statistics NZ online interface for extracting New Zealand trade statistics, available here: <http://archive.stats.govt.nz/infoshare/>

Imports from Belgium and the Netherlands represent 26.6% of total imports and therefore the test for negligibility is met.

This application is based on threat of material injury. The evidence available to PNZ shows that there has been a significant change in circumstances due to Covid-19 – namely, a high likelihood of substantially increased imports – which will cause a situation in which dumping will result in material injury to domestic industry, unless urgent action is taken. This change in circumstances is clearly foreseeable and imminent based on:

- The capacity and existing inventories of like goods and raw materials available in Belgium and the Netherlands
- Evidence of collapsing export prices which in the past has led to increased imports
- The government support the industry in Belgium and the Netherlands is receiving which when passed on will result in continued production, leading to surpluses and lower export prices

Evidence of the level of support the industries in Belgium and the Netherlands is available.

- Reference to Belgium support available on European Commission website https://ec.europa.eu/commission/presscorner/detail/en/mex_20_1415
- Reference to Dutch support available on European Commission website https://ec.europa.eu/commission/presscorner/detail/en/ip_20_839
- Further evidence in this link on how to apply to access Dutch support <https://business.gov.nl/subsidy/compensation-horticulture-and-floriculture-hit-corona-crisis/>

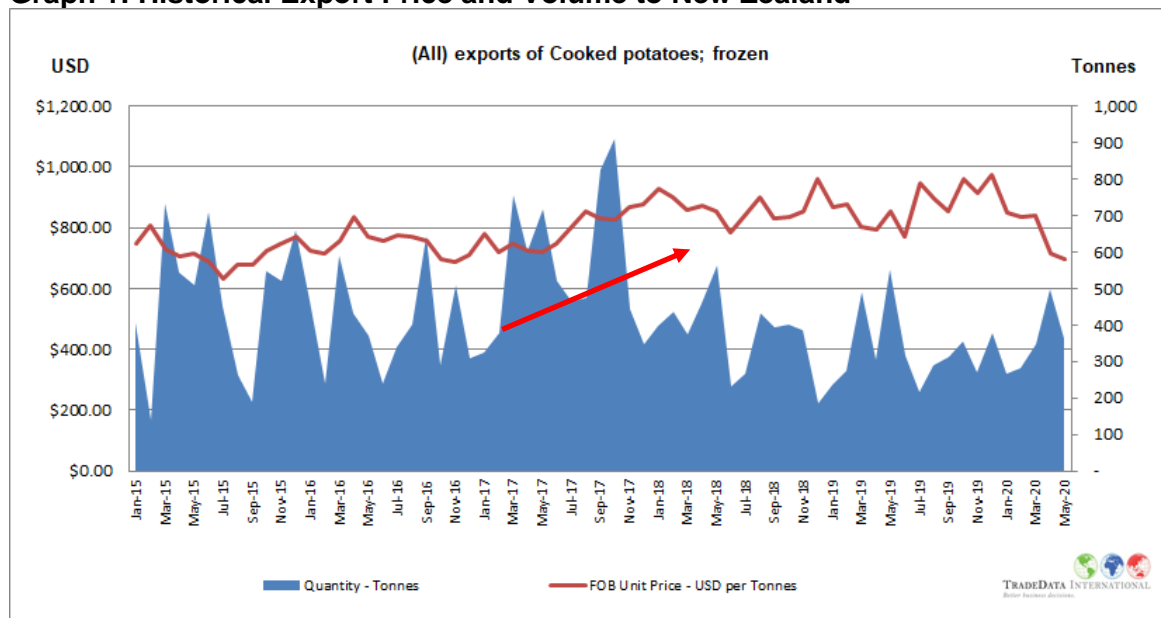
This support, compounded with the effects of reduced demand due to Covid-19 has had the effect of decimating the value of the raw material needed to produce frozen fries and wedges, namely potatoes. Evidence of this is available in Appendix 11.8, page 15, graph of 'Belgian early potato prices in €/tonne by weeks of the year' showing price now versus prior years.

Change in Circumstances Leading to Increase in Exports

The New Zealand Infoshare database has a time lag of up to nearly 8 weeks which means product could currently be in transit or even be in New Zealand warehouses to turn the threat of material injury into reality. An analysis of exports can provide insights into future trends in import data.

Recent prices of exports of frozen fries and wedges falling under EU tariff key 20041010 shows that the price has collapsed to levels not seen since November 2016. The low prices in 2016 caused significant increases in exports to New Zealand as can be seen in Graph 1.

Graph 1: Historical Export Price and Volume to New Zealand



Source: TradeData International Ltd.

The collapse in price in the most recent period has been at a significantly faster rate than what we have seen previously. Comparing May 2020 with 6 months prior a 24% decrease. We can see that once the export price is attractive enough, (see for example, from November 2016 in Graph 1 where the price had decreased 10% from 6 months prior), imports into New Zealand will increase. While threat of imports generally operates as a competitive constraint on New Zealand producers, exporters and importers use the unfair advantage of the dumped prices to increase market share in New Zealand. The difference

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in circumstances from 2016/17 to today is the sudden and profound impact of Covid-19 on hospitality industries globally resulting in a contraction in demand for exports from Belgium and the Netherlands resulting in vast surpluses of frozen fries and wedges available for export. Evidence available in section 7 estimates these surpluses are between 204,606 and 231,000 tonnes, compared to New Zealand monthly average production of xxxx[production figure] tonnes for the New Zealand market. The impact of Covid-19 is a very significant difference. Whereas in 2016/17, the New Zealand industry was able to reach a state of equilibrium, the likely import numbers we are looking at over the coming months would not allow for the same outcome. Rather, all reasonable projections suggest that the industry would be decimated.

Further evidence that imports are likely to increase and that global demand has contracted is available through an analysis of exports to New Zealand and to other global markets from the Netherlands and Belgium for the month of April and May where this data is available. What this shows is:

- Exports to New Zealand are 101% versus one year ago
- Exports to top 3 global markets 54% versus one year ago
- Exports to top 6 global markets 67% versus one year ago
- Exports to top 10 global markets 63% versus one year ago
-

Note these top 3/6/10 global markets are all markets outside of EU. Export data for May for the EU is not available at this time. This demonstrates that relative to the rest of world, imports to New Zealand are significantly higher. What this highlights is that New Zealand is a highly attractive market and it is likely this will continue with the surpluses now available in the Netherlands and Belgium. In other words, if exports to the top 3 global markets were only 54% in April and May versus one year ago, this leaves a lot of product needing to find a market, between 204,606 and 231,000 tonnes from section 7 analysis. Given that exports to New Zealand were, in relative terms, already well above those other markets for April and May, we can logically expect those export numbers to rise as New Zealand is a viable market for the surplus.

This analysis is available as Appendix 11.10 and is also heavily influenced by exports to the United States of America (USA). The USA is the one market that has shown significant growth over this period as Belgium and the Netherlands sell some of the surpluses to this market. The potato industry in the USA has noticed this also and is similarly concerned and calling for similar actions, reference here:

<https://www.frozenfoodsbiz.com/us-potato-industry-calls-for-tariff-hike-on-frozen-fry-imports-from-eu/>

These reductions in exports for other markets are due to the global impacts of Covid-19, in particular the hospitality industries in most countries closing resulting in significantly lower demand. What this means is that inventories exist in Belgium and the Netherlands that now must be sold. It is also significant to recognise statements from the World Health Organisation that the Covid-19 pandemic is accelerating in other markets which will further suppress demand and increase inventory surpluses. References available:

https://www.nzherald.co.nz/world/news/article.cfm?c_id=2&objectid=12341473
<https://www.youtube.com/watch?v=n1OV86I-CEU>

Exporters

PNZ is not aware specifically of which producers in Belgium are exporting to New Zealand but a simple google search found the following producers who have the capacity to export:

<https://www.belgianpotatoproducts.com/en/find-a-supplier>

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Importers

PNZ and the producers it represents do not import any frozen potato products from Belgium. The Ministry with access to customs data will be able to identify the current importers from Belgium.

It is known that the following New Zealand companies do import frozen potato products from Belgium and the Netherlands:

- Foodstuffs New Zealand
- Woolworths New Zealand
- Bidfood New Zealand
- Kraft Heinz

Using this data gives an export price in Table 5 below.

Table 5: Belgium Export Price Year End April 2020

Value for duty (USD)		1,869,273,171
Volume (Tonnes)		2,462,545
VFD/KG		0.76
Currency Conversion (Euro)	0.9020	0.68
Freight to port	0.11	0.11
ex-Factory Euro/KG		0.57

Source: Appendix 10.3 TradeData, Appendix 10.2

This is the export price that will be used in the dumping analysis. Being a larger sample to all markets at more refined tariff codes it will be more representative of the like goods produced by the New Zealand industry. This data source and method has been accepted by the Ministry in previous investigations.

The same analysis is also conducted for the Netherlands with the calculation based on Infoshare data in Table 6 below.

Table 6: Netherlands Export Price Year End April 2020

Value for duty (NZD)		4,338,240
Volume (KG)		2,847,867
VFD/KG		1.52
Currency Conversion (Euro)	0.5788	0.88
Freight to port	0.11	0.11
ex-Factory Euro/KG		0.77

Source: Appendix 10.1 Statistics NZ (Infoshare), Appendix 10.2

Analysing the 12 months it is apparent that the value for duty per kilogram varies from month to month with variations from \$1.31 to \$1.74 over the 12 months. Again, this could be due to the mix of products being imported.

The analysis using TradeData is below in Table 7.

Table 7: Netherlands Export Price Year End April 2020

Value for duty (USD)		1,453,762,331
Volume (Tonnes)		1,611,821
VFD/KG		0.90
Currency Conversion (Euro)	0.9020	0.81
Freight to port	0.11	0.11
ex-Factory Euro/KG		0.70

Source: Appendix 10.3 TradeData, Appendix 10.2

This is the export price that will be used in dumping analysis. Being a larger sample to all markets at a more refined tariff code it will be more representative of the like goods, additionally this data source and method has been accepted by the Ministry in previous investigations.

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products from Belgium and the Netherlands will cause material injury to the New Zealand industry.

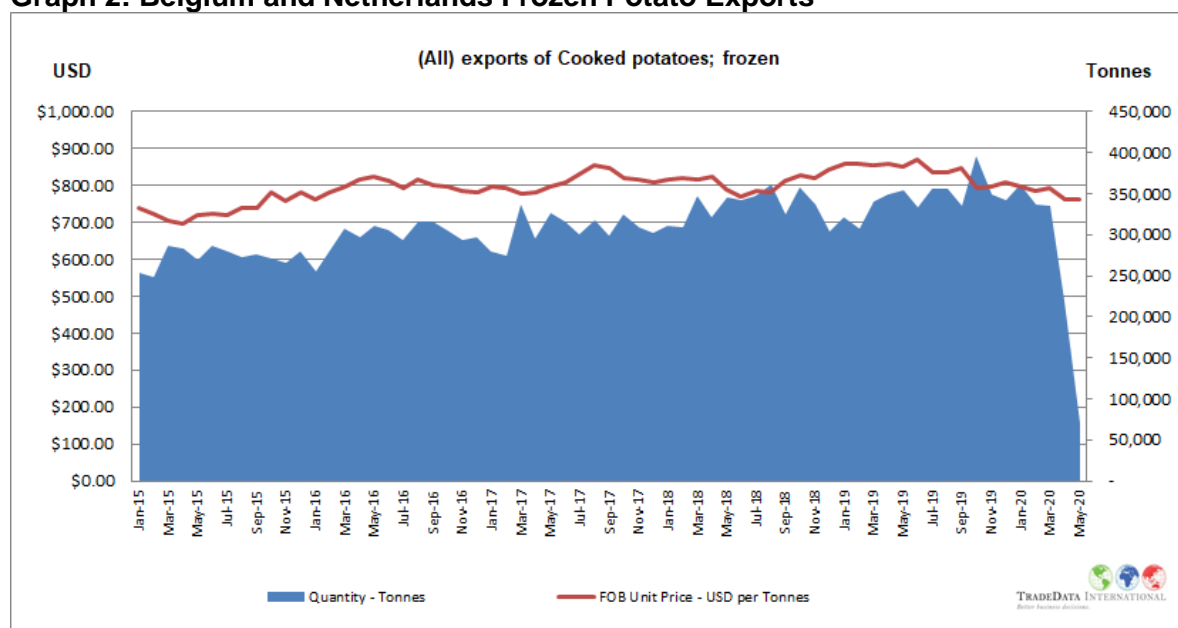
7. Evidence of Material Injury

Exports from Belgium and the Netherlands

This application is based on the threat of material injury. As such it is important to understand exports, available inventories and capacity of the exporting countries.

Belgium and the Netherlands are significant exporters of frozen potato products. On average they export 350,000 tonnes of frozen fries and wedges per month combined. (which compares to an average monthly production of xxx[x] tonnes in New Zealand for the New Zealand market). Evidence of this is available in Graph 2 below. Note data for May 2020 incomplete.

Graph 2: Belgium and Netherlands Frozen Potato Exports



Source: TradeData International Ltd.

What is evident also from this chart is that the export price has been trending down over the last 12 months. Note, not all export volumes for the month of May are available at this time as mentioned in the section 5 analysis. But from the section 5 analysis showing that the major export countries that have published data have taken 54-67% of volume versus year ago last two months, extrapolating this for all markets would mean there is, at the lower end of projections, 33% (100% - 67%) surplus of 2 months x 350,000 tonnes, or 231,000 tonnes surplus inventory available.

To support this, an analysis can be made between releases of export data for all countries as a crosscheck.

An alternate analysis based on analysing the month of March between March and April releases of March export data, with April's release of data having the complete data set for March, shows a surplus of 60,559 tonnes.

Applying the same logic, analysing the month of April between April and May releases of April export data, with April's release of data having the complete data set for April, shows a surplus of 144,047 tonnes.

Total combined surplus from reduced export demand for months of April\May of 204,606 tonnes.

Available surpluses of between 204,606 and 231,000 tonnes are significant, available and a threat to the New Zealand industry. March, April and Mays TradeData is available as Appendix 3. The analysis to derive the 204,606 tonnes is available below as Table 13.

Table 13: TradeData Export Data Releases Comparison

Export Tonnes	March	April
March Data Release	129,519	
April Data Release	337,372	81,588
March Delta	207,853	
Projected April Release		289,441
Average Exports		350,000
Surplus Inventory		60,559
Export Tonnes	April	May
April Data Release	81,588	
May Data Release	218,537	69,004
April Delta	136,950	
Projected May Release		205,953
Average Exports		350,000
Surplus Inventory		144,047
Total April\May Surplus		204,606

Source: TradeData

To put it into context, the lower estimate of 204,606 tonnes surplus is more than 12 months sales of the entire New Zealand market. The average monthly production in New Zealand is only xxxx[production figure] tonnes for the New Zealand market. Even if a small percentage of the Dutch and Belgian surplus was to be exported to New Zealand at dumped prices, the impact on the New Zealand industry would be significant. There is supporting evidence for this in the experience of other industries. In particular, it has been shown in other anti-dumping investigations for food (Preserved Peaches from Spain 2011, Preserved Peaches from China 2006), that it only takes a relatively small volume of imports to cause injurious price effects and material injury. There is no reason to expect the outcome to be any different in the potato industry. To the contrary, the outcome is likely to be worse given the disparity between surpluses available in the Netherlands and Belgium, and New Zealand production figures.

Other information available to PNZ shows a huge surplus of 1.75 million tonnes of potato raw material available created by the Covid 19 crisis. (Netherlands 1,000,000 tonnes and Belgium 750,000 tonnes) – (see links below). It is recognised that the European industry is investigating alternative channels to alleviate these surpluses, for example in production of biofuel. Evidence available to PNZ would indicate, however, that these alternative channels do not have a requirement for all of these potatoes, even at no cost. These alternate industries already had raw material in their own supply chains planned for consumption within them before the surplus of potatoes became apparent. Furthermore, the impact of Covid-19 means that these alternate channels will have their own surpluses in their supply chains to manage. These facts suggest that the most likely scenario is that the potato raw material will still be used in its original industry, namely frozen potato processing. Evidence of these surpluses is provided in the following links. Note quote in

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second link that processors are continuing to process until they have no storage capacity left which is further evidence that very high inventories and capacity exists.

<https://www.npr.org/sections/coronavirus-live-updates/2020/05/03/848214754/belgians-urged-to-eat-more-fries-to-help-potato-farmers-amid-pandemic-related-ql>

<https://www.dutchnews.nl/news/2020/03/the-dutch-have-potato-mountain-now-snack-bars-are-closed/>

The World Potato Market Report, Appendix 10.5, of 16.06.2020 is evidence of this surplus of raw potatoes already being used in processing. It shows potato processors purchasing potatoes from the free-buy market at prices of 0-30 Euro/Tonne compared to contract prices of 160-165 Euro per tonne. The fact that potato processors are buying additional free-buy material above and beyond contracted material would indicate the processors are taking advantage of this situation. The cost advantage of this lower priced raw material will mean that exporters will be able to pass on savings to generate more export demand to reduce their surpluses.

In these uncertain times due to Covid-19 it is also likely that producers operating at 70-100% in Belgium and the Netherlands will further exacerbate inventory surpluses. With infection rates of Covid-19 still increasing in many significant markets including the Americas and the Middle East, as well as phased exits from lockdowns due to Covid-19 in many global markets, demand for frozen potato is still going to be lower than pre Covid-19 with social distancing requirements reducing capacity in hospitality industries globally.

Material Injury

Material injury to the New Zealand industry is likely to be caused in various ways depending on how each producer chooses to react once further dumped imports arrive in the country. The most likely scenarios are:

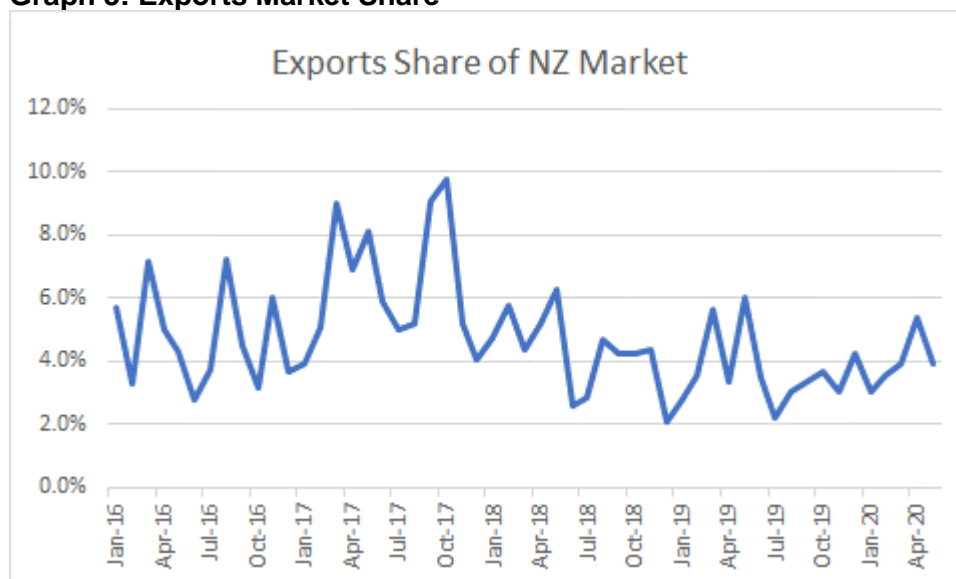
- Loss of market share and increased inventories with increased imports taking market share
- Price undercutting, price depression and price suppression leading to a loss of profits for the industry as the industry competes with dumped imported product
- Longer term effects of a reduction in utilisation of production capacity leading to reduced employment levels within the industry.
- Producers exiting the industry

Each of these is analysed in more detail below.

Loss of Market Share

Graph 3 shows the sudden and significant rate market share gained in 2017 from increased imports from Belgium and the Netherlands. As discussed above, the current collapse in export prices is greater than that seen in late 2016. The price decrease in late 2016 led to an increase of imports in 2017. With the greater price collapse now, combined with reduced global demand due to Covid-19, and associated significant surplus inventories, it is expected there will be a far greater volume of exports to New Zealand in coming months.

Graph 3: Exports Market Share



Source: IRI Scan Data, Table 1, TradeData International Pty.

If this approach was taken, the extra market share, would result in increased inventories for the New Zealand industry in the short term but result in reduced annual demand on the New Zealand industry in the long term which would mean lower production and a reduction in potato growing with some growers having to diversify into other crops. This diversification would lead to lower production of raw potatoes for processing, as well as lower seed potato demand which in turn would be planned for which would make increasing production back to current levels difficult.

The full impact of increased exports may not be immediate. For the purposes of this injury analysis it has been assumed that the New Zealand industry would need to compete on price to sell existing inventories in the next 12 months. The reason for this is that the present crop is planted and existing supply arrangements (i.e. from growers to producers) will endure for some time. Further, it is widely known that the New Zealand industry is applying for trade remedies and provisional measures to defend itself against dumped exports which may have the effect of dampening demand from these exports in the short term while the application is reviewed. Therefore, the injury analysis is based on more significant increases occurring from January 2021 and the full economic impact on New Zealand industry becoming apparent then.

Price Undercutting

The point at which the imported frozen potato products compete with the New Zealand industry is ex-wharf. This ex-wharf price needs to be compared with the New Zealand industries ex-warehouse price for a price undercutting analysis to take place. This analysis is available as Table 14 below

Table 14: Current Price Undercutting Analysis

Producer	Ex-Warehouse Price/KG	Imported Price/KG	Undercutting/KG	Undercutting %
McCains	xxxx	xxxx	xxxx	xxxx
Talleys	xxxx	xxxx	xxxx	xxxx
Mr Chips	xxxx	xxxx	xxxx	xxxx
Makikihi Fries	xxxx	xxxx	xxxx	xxxx
Total NZ Industry	xxxx	xxxx	xxxx	26.7%

Source: NZ Producers, TradeData

Economic Impact

The current economic performance of the industry is in Table 18 below.

Table 18: Current Industry Financial Performance

	McCains	Talleys	Mr Chips	Makikihi Fries	Total
Output Tonnes	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Sales Tonnes NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Sales Revenue NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Cost of Goods NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Gross Profit NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Selling and Administration Costs NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
EBIT NZ					
Per KG	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Sales Revenue NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Cost of Goods NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Gross Profit NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Selling and Administration Costs NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
EBIT NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx

Source: NZ Producers

The forecasted economic performance in the absence of anti-dumping duties is in Table 19 below. This forecast assumes the increased imports at dumped prices will be sold from January to June 2021. This is due to the fact that currently PNZ has an application for a trade remedies investigation in progress which to a degree acts as a deterrent currently given provisional measures may be put in place.

Table 19: Industry Financial Forecast without Anti-Dumping Duty

	McCains	Talleys	Mr Chips	Makikihi Fries	Total
Output Tonnes	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Sales Tonnes NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Sales Revenue NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Cost of Goods NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Gross Profit NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Selling and Administration Costs NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
EBIT NZ					
Per KG	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Sales Revenue NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Cost of Goods NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Gross Profit NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Selling and Administration Costs NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
EBIT NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx

Source: NZ Producers, Table 14

A further forecast is provided with the full extent of the forecast price undercutting in effect in Table 20 below.

Table 20: Industry Financial Forecast without Anti-Dumping Duty

	McCains	Talleys	Mr Chips	Makikihi Fries	Total
Output Tonnes	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Sales Tonnes NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Sales Revenue NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Cost of Goods NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Gross Profit NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Selling and Administration Costs NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
EBIT NZ					
Per KG	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Sales Revenue NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Cost of Goods NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Gross Profit NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Selling and Administration Costs NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
EBIT NZ	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx

Source: NZ Producers, Table 15

Tables 18 through 20 show the price undercutting leading to price depression and suppression leading to a decline in revenue and profits or material injury.

Losses to this extent would make producing frozen fries and wedges untenable in New Zealand. Post June 2021 the Producers would exit the industry.

Loss of Sales Revenue and Profit

A summary of the loss of sales revenue and EBIT is available in Table 21 below.

Table 21: Loss of Sales Revenue and EBIT

	McCains	Talleys	Mr Chips	Makikihi Fries	Total
Loss of Sales Revenue	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Loss of EBIT	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Loss of Sales Revenue % of Current	xxxxx	xxxxx	xxxxx	xxxxx	13%
Loss of EBIT % of Current	xxxxx	xxxxx	xxxxx	xxxxx	83%

Source: Table 18, Table 19

A further forecast is shown in Table 22 with the full effect of the current Belgium and the Netherlands support driving cost of raw material and export price down.

Table 22: Loss of Sales Revenue and EBIT

	McCains	Talleys	Mr Chips	Makikihi Fries	Total
Loss of Sales Revenue	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Loss of EBIT	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Loss of Sales Revenue % of Current	xxxxx	xxxxx	xxxxx	xxxxx	24%
Loss of EBIT % of Current	xxxxx	xxxxx	xxxxx	xxxxx	149%

Source: Table 18, Table 20

Such a loss of sales revenue would give rise to substantial productive and allocative inefficiency for New Zealand producers, which would cause long term damage and disruption to the New Zealand potato industry. Producers exiting would exit the industry in New Zealand post June 2021 and growers would diversify into other crops. With the disappearance of local producers and growers, local demand would rapidly exceed supply;

In the absence of a trade remedies investigation, or anti-dumping duties not being put in place, employment post June 2021 reduces to nil with the NZ Producers exiting the industry.

Use of Production Capacity

A summary of production capacity of the industry is available in Table 25 below.

Table 25: Industry Production Capacity Summary

	McCains	Talleys	Mr Chips	Makikihi Fries	Total
Production Capacity (tonnes)	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx
Utilisation %	xxxxx	xxxxx	xxxxx	xxxxx	xxxxx

Source: NZ Producers

Forecasted production capacity utilisation levels for the next 12 months is assumed to be the same as the past 12 months given:

- The frozen fries and wedges market is mature
- The industry works through the application process which is currently acting as a potential deterrent for exporters and importers, especially with provisional measures requested.

In the absence of a trade remedies investigation, or anti-dumping duties not being put in place, production capacity utilisation post June 2021 reduces to nil with the NZ Producers exiting the industry.

Productivity

Productivity, that is production per employee, will be impacted negatively if the viability of the industry is put into question.

Forecasted productivity for the next 12 months is assumed to be the same as the past 12 months given:

- The frozen fries and wedges market is mature
- The industry works through the application process which is currently acting as a potential deterrent for exporters and importers, especially with provisional measures requested.

In the absence of a trade remedies investigation, or anti-dumping duties not being put in place, productivity post June 2021 reduces to nil with the NZ Producers exiting the industry.

8. Other Causes of Injury

Like Goods not Sold at Dumped Prices

The New Zealand industry is unconcentrated and usually highly contested, with threat of imports providing further constraint but without suppressing price. PNZ is not aware of any injury being caused through fairly traded products.

Contraction in Demand or Changes in the Patterns of Consumption

The industry has suffered short term reduction in demand due to New Zealand Covid-19 lockdown restrictions which it is now working its way out of. The purpose of this application is to ensure this demand is not reduced even further with the threat of substantially increased imports from Belgium and the Netherlands at significantly dumped prices.

Restrictive Trade Practices of; and Competition Between, Overseas and New Zealand Producers

The New Zealand frozen potato industry is competitive and have not been subject to investigation by the Commerce Commission.

PNZ is not aware of any further restrictive trade practices currently affecting the New Zealand industry.

Developments in Technology

PNZ does not believe that there is any evidence of a technology development relevant to the consideration of material injury.

PNZ is of the understanding that the New Zealand industries method of producing frozen products is similar to that of other producers.

Export Performance and Productivity of the New Zealand Producer

The potato industry exports a significant volume of frozen fries to Australia, Asia and the Pacific Islands. These exports measure 75,952 tonnes by volume generating \$99 million revenue for the New Zealand economy. This is available as Appendix 11.6.

Imports by the Industry

Of the four producers who support the application xxxxxxxx[importer] imports some product from xx[sources]. In the last year 12 months this has been xxxx[figure] tonnes from xxxxxx[source] and xxxx[figure] tonnes from the xxxxxx[source] at a total value of xxxxxxxx[figure].

9. Causal Link

The significant elements of the causal link are:

- Frozen potato products are being exported at dumped prices
- Increased and available inventories, the significant change in circumstance, caused by Covid-19 which has had an effect of:
 - Reducing frozen potato demand globally as hospitality industries are shut during lockdowns and operating at lower capacity due to social distancing requirements
 - Reduced demand has led to surpluses of frozen potato inventory and potato raw material in Belgium and the Netherlands
 - Intervention (support) measures have been put in place in Belgium and the Netherlands to assist the industry by mitigating the impact of Covid-19 induced surpluses
- There is evidence of surplus inventory of frozen potato products available in the Netherlands and Belgium which will result in substantially increased import volumes.
- There is evidence to suggest surplus capacity exists with producers currently intent to keep producing frozen potato products until they run out of storage.
- There is evidence that government support for the industries in Belgium and the Netherlands, is being taken advantage of, with producers buying low priced raw material from the free-buy market, which will result in further export price reductions, increasing dumping margins.
- There is evidence to suggest the import volume will grow and accelerate relative to current imports

The forecast substantial increase in volume of the imports along with the downward price pressure from the dumped imports will result in price undercutting, price depression and price suppression resulting in a loss of sales and profits for the New Zealand industry.

Therefore, the threat of material injury exists and is caused by a reduction in demand leading to increased inventories and capacity of frozen potato products in Belgium and the Netherlands, which are being exported at dumped prices.

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10. Confirmation of Application

I apply, on behalf of Potatoes New Zealand Inc., for the initiation of an investigation for anti-dumping duties applicable to *Frozen potato fries and wedges falling under tariff code 2004100000* from Belgium and the Netherlands.

In support of this application I attach positive evidence of:

- i. Dumping, in the form of export price being significantly lower than normal value;
- ii. The likely threat of material injury to the industry from the dumped imports; and
- iii. The causal link between dumped goods and threat of material injury

Potatoes New Zealand Inc. makes this application as the industry association representing the interests of the New Zealand potato industry and is supported by producers making up more than 50% of like goods for domestic consumption.

Signed



Name Simon Crampton

Date 30th August 2020

11. APPENDICES

1. Infoshare Import Data
2. Exchange Rates (x-rates.com)
3. TradeData International Pty. Ltd. Export Data *[cOnfidential]*
4. Belgium and Netherland Retail Prices
5. World Potato Market Report 16.06.2020 *[cOnfidential]*
6. New Zealand Industry Exports
7. Detailed Market Intelligence *[cOnfidential]*
8. World Potato Market Report 11.08.2020 *[cOnfidential]*
9. World Potato Market Report 09.06.2020 *[cOnfidential]*
10. Exports to Top 10 non EU Countries *[cOnfidential]*

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Appendix 11.1 – Infoshare Import Data

Harmonised Trade - Imports (Monthly)											
Belgium				Netherlands							
Vegetable preparations; potatoes, prepared or preserved otherwise than by vinegar or acetic acid, frozen				Vegetable preparations; potatoes, prepared or preserved otherwise than by vinegar or acetic acid, frozen							
	Quantity	Cost including insurance and freight	Value for duty	Quantity	Cost including insurance and freight	Value for duty		Quantity	Cost including insurance and freight	Value for duty	
2018M12	76,902	165,267	148,581	271,977	400,657	353,967		348,879	565,924	502,548	
2019M01	87,540	151,509	133,512	311,116	456,081	398,209		398,656	607,590	531,721	
2019M02	42,771	106,736	96,768	56,056	99,520	89,572		98,827	206,256	186,340	
2019M03	190,939	341,732	304,151	204,790	380,589	345,285		395,729	722,321	649,436	
2019M04	108,055	219,795	196,997	302,988	499,870	449,190		411,043	719,665	646,187	
2019M05	405,754	582,969	512,455	203,744	327,567	291,023		609,498	910,536	803,478	
2019M06	229,680	339,304	302,819	263,660	392,249	345,896		493,340	731,553	648,715	
2019M07	220,678	397,498	358,726	175,140	323,265	291,105		395,818	720,763	649,831	
2019M08	240,410	369,523	327,872	172,656	331,362	299,616		413,066	700,885	627,488	
2019M09	139,407	303,728	276,538	347,452	622,274	554,881		486,859	926,002	831,419	
2019M10	118,311	230,673	213,690	146,251	273,109	243,947		264,562	503,782	457,637	
2019M11	120,595	211,226	194,772	256,987	426,571	380,375		377,582	637,797	575,147	
2019M12	132,680	247,640	223,751	318,190	585,136	528,129		450,870	832,776	751,880	
2020M01	170,639	338,161	309,529	135,166	256,383	231,885		305,805	594,544	541,414	
2020M02	89,787	246,701	227,463	364,450	574,917	509,288		454,237	821,618	736,751	
2020M03	203,694	466,350	432,699	221,999	350,973	314,630		425,693	817,323	747,329	
2020M04	94,276	217,731	203,757	242,172	384,968	347,465		336,448	602,699	551,222	
								5,013,778	8,800,278	7,922,311	
									1.76	1.58	
Table information:											
Units:											
Cost including insurance and freight: Dollars, Magnitude = Units (in 1s)											
Quantity: Number, Magnitude = Units (in 1s)											
Value for duty: Dollars, Magnitude = Units (in 1s)											
Footnotes:											
Quantity unit:											
Code 2004100000: Kgms											
Data is provisional for the three most recently released months.											
Aggregated Harmonised System (HS) codes may include confidential 10 digit codes, in which case the summed data will exclude the confidential value(s).											
All dollar values are in New Zealand dollars unless otherwise stated.											
For more information, please see www.stats.govt.nz/trade											
Symbols:											
.. figure not available											
C: Confidential											
E: Early Estimate											
P: Provisional											
R: Revised											
S: Suppressed											
N: No applicable data can be displayed											
Status flags are not displayed											
Table reference:											
TIM001C											
Last updated:											
Cost including insurance and freight: 26 May 2020 10:45am											
Quantity: 26 May 2020 10:45am											
Value for duty: 26 May 2020 10:45am											
Source: Statistics New Zealand											
Contact: Information Centre											
Telephone: 0508 525 525											
Email: info@stats.govt.nz											

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Appendix 11.2 – Exchange Rates (x-rates.com)

	NZD:Euro		NZD:USD		USD:Euro
May-19	0.5868		0.6567		0.8935
Jun-19	0.5839		0.6594		0.8854
Jul-19	0.5953		0.6682		0.8909
Aug-19	0.5784		0.6440		0.898
Sep-19	0.5753		0.6339		0.9075
Oct-19	0.5733		0.6336		0.9048
Nov-19	0.5784		0.6395		0.9043
Dec-19	0.5934		0.6590		0.9005
Jan-20	0.5960		0.6620		0.9003
Feb-20	0.5860		0.6398		0.9159
Mar-20	0.5464		0.6049		0.9034
Apr-20	0.5523		0.6004		0.9199
May-20	0.5571		0.6083		0.9158
avg M19-A20	0.5788		0.6418		0.9020

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Appendix 11.4 – Belgium Domestic Prices (excel workbook provides screen shots)

Retailer	Product	Weight	Price	Price/
Delhaize	McCain Four Special Classic Oven Fries	0.600	3.05	5.08
Delhaize	Lutosa Belgian Oven Fries	0.600	3.15	5.25
Delhaize	Lutosa Belgian Fries	1.000	2.85	2.85
Delhaize	McCain Shoestring (Alumettes)	0.600	3.45	5.75
Delhaize	McCain Wide (Breed)	0.600	3.45	5.75
Delhaize	Delhaize Maxi Pak	2.500	2.29	0.92
Delhaize	Delhaize Fines (Fijne)	1.000	0.95	0.95
Delhaize	Delhaize Fries	1.000	1.09	1.09
Delhaize	365 Fries	2.000	1.55	0.78
Delhaize	365 Shoestring	1.000	0.75	0.75
Delhaize	McCain Shoestring (Alumettes)	1.000	3.15	3.15
Delhaize	McCain Traditional	1.000	3.39	3.39
Delhaize	Delhaize Steak Fries	1.000	2.49	2.49
Delhaize	Lutosa Oven Fries	0.600	3.15	5.25
Delhaize	McCain Dippers	0.650	4.05	6.23
Delhaize	McCain Belgian	1.000	4.25	4.25
Delhaize	McCain Airfryer	0.500	3.15	6.30
Delhaize	McCain Traditional	2.000	4.19	2.10
Delhaize	McCain Home Fries	1.000	3.29	3.29
Albert Heijn	AH Oven Fries	0.750	0.70	0.93
Albert Heijn	AH French Fries	0.750	1.49	1.99
Albert Heijn	McCain Special Oven Fries	0.600	2.99	4.98
Albert Heijn	Aviko Fries	1.000	1.79	1.79
Albert Heijn	AH Flemish Fries	0.750	0.75	1.00
Albert Heijn	AH Basic Fries	1.000	0.65	0.65
Albert Heijn	AH Basic Fries	2.500	1.59	0.64
Albert Heijn	AH Airfryer Fries	0.600	1.99	3.32
Intermarche	McCain Home Fries	1.000	3.29	3.29
Intermarche	Lutosa Belgian Fries	1.000	2.70	2.70
Intermarche	Lutosa Steak Fries	1.000	3.99	3.99
Intermarche	Mondy Fries	2.500	1.79	0.72
Intermarche	McCain Tradional	1.000	3.29	3.29
Intermarche	McCain Tradional	2.000	4.06	2.03
Intermarche	McCain Oven Classic	0.600	3.06	5.10
Intermarche	Bouton d'Or Fries	2.500	2.19	0.88
Intermarche	Bouton d'Or Fries	1.000	1.09	1.09
Intermarche	Bouton d'Or Fries Four	0.750	2.69	3.59
Intermarche	Saint Eloi Fries	2.500	3.99	1.60
Intermarche	McCain Belgian	1.000	4.10	4.10
Intermarche	Bouton d'Or Fries Shoestring Four (Alume	0.750	2.49	3.32
Intermarche	Bouton d'Or Fries Shoestring (Alumettes)	1.000	0.99	0.99
Albert Heijn	AH Wedges	0.600	1.99	3.32
				2.88

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Appendix 11.4 – Netherlands Domestic Prices (excel workbook provides screen shots)

Retailer	Product	Weight	Price	Price/l
Albert Heijn	AH Basic Frites	2.500	1.99	0.80
Albert Heijn	AH Airfryer Fries	0.600	1.69	2.82
Albert Heijn	Aviko Pomme Frites	1.000	1.79	1.79
Albert Heijn	AH Ribel Frites	0.750	0.89	1.19
Albert Heijn	AH Oven Frites	0.750	1.04	1.39
Albert Heijn	Aviko Pomme Frites	2.500	3.79	1.52
Albert Heijn	Aviko French Fries	0.750	1.55	2.07
Albert Heijn	Beyerlander Airfryer Fries	0.500	2.19	4.38
Albert Heijn	Aviko French Fries	1.000	2.19	2.19
Albert Heijn	AH Basic Frites	1.000	1.12	1.12
Albert Heijn	Beyerlander Oven Fries	0.600	2.46	4.10
Albert Heijn	AH Flemish Fries	0.750	1.42	1.89
Albert Heijn	Aviko Airfryer Thin Fries	0.750	2.19	2.92
Albert Heijn	AH Basic Frites	1.000	1.19	1.19
Albert Heijn	Aviko Airfryer Thick Fries	0.750	2.35	3.13
Albert Heijn	Aviko Skinny Fries	0.600	2.25	3.75
Albert Heijn	Leon & Leon Fries	0.500	1.99	3.98
Albert Heijn	Aviko Race Original Fries	0.600	2.19	3.65
Albert Heijn	McCain Airfryer Shoestrings	0.500	2.89	5.78
Albert Heijn	McCain Golden Long Fries	0.750	2.56	3.41
Albert Heijn	McCain Four Special Oven Fries	0.600	3.07	5.12
Dirk	de Beste Pommes Frites	1.000	1.05	1.05
Dirk	de Beste Mini Frites	1.000	0.99	0.99
Dirk	Aviko Pommes Frites	1.000	1.55	1.55
Dirk	Aviko Franse Frites	1.000	1.89	1.89
Dirk	Lekke Verse Frites	0.700	0.99	1.41
Dirk	de Beste Flemish Frites	0.750	1.08	1.44
Dirk	Aviko Pommes Frites	2.500	3.49	1.40
Dirk	Aviko Skinny Fries	0.600	2.12	3.53
Dirk	Lamb Weston Rustic Fries	0.750	1.99	2.65
Dirk	Lamb Weston Skin On Fries	0.750	1.99	2.65
Dirk	de Beste Oven Fries	0.750	0.99	1.32
Jumbo	Jumbo Vlamme Frites	1.000	1.65	1.65
Jumbo	Jumbo Oven Frites	2.500	1.99	0.80
Jumbo	Jumbo Oven Frites	1.000	1.36	1.36
Jumbo	Jumbo Franse Frites	1.000	1.90	1.90
Jumbo	Jumbo Frites	1.000	1.08	1.08
Jumbo	Aviko Pomme Frites	2.500	3.75	1.50
Jumbo	Aviko Franse Frites	1.000	2.05	2.05
Jumbo	Aviko Vlaamse Oven Fries	0.750	2.08	2.77
Jumbo	Jumbo Crinkle Frites	1.000	1.18	1.18
Jumbo	Beyerlander Airfryer Fries	0.500	1.98	3.96
				2.69

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Appendix 11.6 – NZ Industry Exports Year to April 2020

	Vegetable preparations; potatoes, prepared or preserved otherwise than by vinegar or acetic acid, frozen	
	Quantity	Free on board
Anguilla	14,640	20,477
Australia	45,322,539	57,199,642
China, People's Republic of	1,352,139	1,545,587
Cook Islands	237,356	378,212
Fiji	868,857	1,190,782
French Polynesia	940,139	1,899,506
Hong Kong (Special Administrative R	234,045	402,217
Indonesia	1,339,674	1,553,489
Japan	2,130,925	3,737,161
Korea, Republic of	122,040	232,121
Laos	14,160	28,994
Malaysia	3,761,130	4,688,073
Mauritius	3,600	5,872
Myanmar	3,360	5,967
New Caledonia	556,733	965,771
Niue	14,036	33,826
Norfolk Island	14,726	27,850
Pakistan	30,000	58,915
Papua New Guinea	1,549,167	1,922,559
Philippines	7,621,540	9,537,845
Portugal	1,000	2,007
Samoa	491,686	669,423
Samoa, American	16,515	22,288
Singapore	410,820	600,942
Solomon Islands	44,490	78,702
Taiwan	1,840,682	2,925,710
Thailand	5,981,701	7,973,721
Tonga	234,770	330,131
Vanuatu	403,171	530,453
Viet Nam	396,171	478,515
Total	75,951,812	99,046,758