



MEDIA BACKGROUND NOTE

Background information for journalists covering the European Commission's anti-circumvention investigation

1. What has happened?

The European Commission opened a formal anti-circumvention investigation after concluding that evidence submitted on behalf of the vast majority of the European plywood industry justified opening a formal investigation. This decision follows the Commission's own assessment of that evidence.

The investigation has also been opened with unusual speed. Coming just eight months after the imposition of definitive anti-dumping duties, it is understood to be the fastest anti-circumvention investigation initiated by the European Commission following the adoption of definitive anti-dumping measures.

2. Why has the Commission acted?

During the original anti-dumping investigation the Commission identified the risk that Chinese exporters might attempt to avoid future duties through cosmetic product changes. It therefore in an unprecedented step introduced dedicated customs monitoring arrangements of the suspected circumventing product before the definitive duties entered into force. Information gathered through that monitoring has now contributed directly to today's investigation.

3. What is the alleged circumvention?

According to the industry's submission, some exporters added an ultra-thin softwood veneer to hardwood plywood - sometimes only 0.05 mm thick, around half the thickness of ordinary office paper solely in order to change the customs's codes and thus avoid, i.e. circumvent, the EU's duties¹.

4. Why is this important?

The Commission concluded in November 2025 that Chinese hardwood plywood had been dumped on the EU market, resulting in definitive anti-dumping duties approaching 90%. If those measures could be avoided through a paper-thin veneer, the effectiveness of EU trade defence rules would be undermined.

5. What changes today?

Products previously monitored and now covered by, the investigation become subject to customs registration immediately. If circumvention is confirmed by the Commission's investigation, then the existing duties may be extended to those products and collected retroactively from the date registration began.

¹ Under Article 13(1)(a) of the Basic Anti-Dumping Regulation (Regulation (EU) 2016/1036), a product modification to change customs classification, where it does not alter the product's essential characteristics, commercial use or performance, constitutes a recognised form of circumvention.



Facts at a glance

0.05 mm	Thickness of some veneers identified.
3,800%	Increase in imports of the modified product.
86.8%	Existing anti-dumping duties approaching 90%.
Immediate	Customs registration starts today.
Retroactive	Unquestionable duty liability of 86.8% if circumvention is confirmed retroactive to the date customs registration first began.
US precedent	Similar practice previously addressed by US authorities and found.

How the Alleged Circumvention Works

Hardwood plywood manufactured in China



Ultra-thin softwood veneers added on top of hardwood plywood (typically 0.05–0.30 mm)



Product declared under a different customs classification



Commission anticipated the risk and introduced detailed customs monitoring at all EU entry points during the original investigation



Monitoring data + industry evidence supported opening today's anti-circumvention investigation



Customs registration now applies immediately



If circumvention is confirmed, existing duties of 86.8% may be extended to the modified product and collected retroactively from the date registration of the import began