



2025/2153

23.10.2025

COMMISSION IMPLEMENTING REGULATION (EU) 2025/2153

of 22 October 2025

imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of screws without heads originating in the People's Republic of China, and levying the definitive anti-dumping duty on the registered imports of screws without heads originating in the People's Republic of China

THE EUROPEAN COMMISSION,

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

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

Whereas:

1. PROCEDURE

1.1. Initiation

- (1) On 17 October 2024, the European Commission ('the Commission') initiated an anti-dumping investigation with regard to imports of screws without heads ('screws') originating in People's Republic of China ('China') on the basis of Article 5 of the basic Regulation. It published a Notice of Initiation in the Official Journal of the European Union ⁽²⁾ ('the Notice of Initiation').
- (2) The Commission initiated the investigation following a complaint lodged on 2 September 2024 by the European Industrial Fasteners Institute ('the complainant' or 'EIFI'). The complaint was made on behalf of the Union industry of screws without heads in the sense of Article 5(4) of the basic Regulation. The complaint contained evidence of dumping and of resulting material injury that was sufficient to justify the initiation of the investigation.

1.2. Registration

- (3) The Commission made imports of the product concerned subject to registration by Commission Implementing Regulation (EU) 2025/141 ⁽³⁾ ('the registration Regulation').

1.3. Provisional measures

- (4) In accordance with Article 19a of the basic Regulation, on 19 May 2025, the Commission provided parties with a summary of the proposed duties and details about the calculation of the dumping margins and the margins adequate to remove the injury to the Union industry. Interested parties were invited to comment on the accuracy of the calculations within three working days. No comments on the accuracy of the calculations were received.
- (5) On 16 June 2025, the Commission imposed provisional anti-dumping duties on imports of screws without heads originating in the People's Republic of China by Commission Implementing Regulation (EU) 2025/1189 ⁽⁴⁾ ('the provisional Regulation').

⁽¹⁾ OJ L 176, 30.6.2016, p. 21, ELI: <http://data.europa.eu/eli/reg/2016/1036/oj>.

⁽²⁾ OJ C, C/2024/6209, 17.10.2024, ELI: <http://data.europa.eu/eli/C/2024/6209/oj>.

⁽³⁾ Commission Implementing Regulation (EU) 2025/141 of 29 January 2025 making imports of screws without heads originating in the People's Republic of China subject to registration (OJ L, 2025/141, 30.1.2025, ELI: http://data.europa.eu/eli/reg_impl/2025/141/oj).

⁽⁴⁾ Commission Implementing Regulation (EU) 2025/1189 of 13 June 2025 imposing provisional anti dumping duties on imports of screws without heads originating in the People's Republic of China (OJ L, 2025/1189, 16.6.2025, ELI: http://data.europa.eu/eli/reg_impl/2025/1189/oj).

1.4. Subsequent procedure

- (6) Following the imposition of provisional measures, the following parties filed comments on the provisional findings within the deadline provided by Article 2(1) of the provisional Regulation:
- the Chinese sampled exporting producers Zhejiang Junyue Standard Part Co., Ltd. ('Junyue'), Chinafar group ('Chinafar') and Brother group;
 - importer Pretec AB;
 - importer Kohlhage Fasteners GmbH and Co. ('Kohlhage');
 - steel supplier association EUROFER;
 - European Fastener Distributors Association ('EFDA');
 - The European Industrial Fasteners Institute ('EIFI' or 'the complainant').
- (7) The parties who so requested were granted an opportunity to be heard. A hearing took place with importer Pretec AB.
- (8) The Commission continued to seek and verify all the information it deemed necessary for its definitive findings. When reaching its definitive findings, the Commission considered the comments submitted by interested parties and revised its provisional conclusions where appropriate.
- (9) The Commission informed all interested parties of the essential facts and considerations, on the basis of which it intended to impose a definitive anti-dumping duty on imports of screws without heads originating in the People's Republic of China ('definitive disclosure'). All parties were granted a period within which they could make comments on the definitive disclosure. The parties who so requested were granted an opportunity to be heard. A hearing took place with EIFI and EFDA.

1.5. Claims on initiation

- (10) No claims were received concerning the initiation. Therefore, the conclusion from recital 6 of the provisional Regulation was confirmed.

1.6. Sampling

- (11) Following provisional disclosure, EIFI argued that not all Chinese exporting producers that came forward in the sampling exercise were genuine producers of headless screws.
- (12) While the Commission had already excluded some of the companies which came forward and found not to be genuine exporting producers from the list annexed to the provisional Regulation, it conducted additional checks in reply to EIFI's submission. The Commission asked all cooperating Chinese companies to provide their business license and articles of association, and, where necessary, additional evidence, showing that they were genuine exporting producers of the product concerned. The companies that did not reply were informed that the Commission considered the failure to reply as non-cooperation in accordance with Article 18 of the basic Regulation. The list of cooperating exporting producers was revised accordingly.
- (13) No further comments were received concerning sampling. Therefore, the conclusions from recitals 7 to 16 of the provisional Regulation were confirmed.

1.7. Investigation period and period considered

- (14) The investigation of dumping and injury covered the period from 1 July 2023 to 30 June 2024 ('the investigation period'). The examination of trends relevant for the assessment of injury covered the period from 1 January 2021 to the end of the investigation period ('the period considered').

2. PRODUCT CONCERNED AND LIKE PRODUCT

- (15) The product under investigation is screws and bolts, whether or not with their nuts and washers, without heads, of iron or steel other than stainless steel, regardless of tensile strength, excluding coach screws and other wood screws, screw hooks and screw rings, self-tapping screws, and screws and bolts for fixing railway track construction material.
- (16) The product concerned is the product under investigation originating in the People's Republic of China, currently falling under CN codes 7318 15 42 and 7318 15 48.

2.1. Claims regarding product scope

- (17) An importer, Pretec AB, argued that hot dip galvanised structural infrastructure rods ('SIRs') of 5,8-metre lengths should be excluded from the product scope of this investigation as they constituted a distinct product due to:
- distinct chemical, physical, and technical characteristics in comparison to other screws, particularly due to their thick zinc coating (45-215 µm) from hot dip galvanisation, which provides superior corrosion resistance compared to electrolytic plating (5-20 µm) and is essential for Nordic climates;
 - SIRs of 5,8-metre lengths are uniquely suited for large infrastructure projects (e.g., bridges, buildings) requiring long-term durability, unlike smaller screws used in household or industrial applications;
 - No Union producer can supply hot dip galvanised SIRs of 5,8-metre lengths demanded in Nordic markets (C3–C5 corrosivity categories), necessitating imports.
- (18) The Commission noted that, indeed, regarding the chemical and physical distinctions, hot dip galvanisation creates a thicker zinc coating (45-215 µm) compared to electrolytic plating (5-20 µm). However, the thickness of galvanisation and length of SIRs were considered to reflect a product's specific application falling then within the same product definition, rather than a different product.
- (19) As for the technical and end-use claims, the Commission found that SIRs were used in the same sectors as other headless screws, notably the construction sector and were therefore in direct competition with other headless screws in this sector.
- (20) Moreover, evidence provided by EIFI demonstrate existing production capabilities of zinc coating between 100 000 and 300 000 MT/year and production of rods up to 6 meters between 50 000 and 150 000 MT/year in the Union. The Commission found that there are other production methods available of protecting steel from corrosion in especially Nordic climates.
- (21) The claim to exclude hot dip galvanised structural infrastructure rods of 5,8-metre lengths was therefore rejected.
- (22) Following definitive disclosure, Pretec submitted that the Commission had not properly considered the full scope of scientific, technical, and regulatory evidence provided by Pretec, supporting the distinct nature of SIRs and that the Commission should therefore reconsider and grant Pretec's request for the exclusion of SIRs. The absence of viable alternatives in the Union and the flawed rationale for product classification further justify excluding SIRs from the scope.
- (23) In particular, Pretec claimed that:
- There are factual scientific and technical distinctions, such as hot-dip galvanization of SIRs, which creates a metallurgical bond between zinc and steel, forming a durable alloy coating with dual corrosion protection (barrier and cathodic) that electrolytic plating cannot replicate. This process fundamentally alters the steel's properties, making SIRs structurally and functionally distinct from other coated products. SIRs used in Nordic infrastructure must meet stringent technical standards (e.g., EN ISO 898-1) for impact strength (27 Joules at – 20 °C) and corrosion resistance in harsh environments (C3–C5 corrosivity classes), which are unmet by electrolytic alternatives.

- SIRs fall under regulatory and market specificity, since they are governed by distinct ISO standards (e.g., ISO 10684, 1461) for corrosion protection and mechanical properties, unlike the standards for small screws or electrolytic plating referenced in the complaint. Also, the Nordic infrastructure projects (e.g., bridges, tunnels) require hot dip galvanized or stainless-steel SIRs due to binding technical specifications from state-owned entities (e.g., Vattenfall, Svenska Kraftnät) and industry frameworks like AMA Anläggning. Electrolytic alternatives are explicitly excluded from these projects.
 - SIRs are non-interchangeable with smaller headless screws due to differences in size, load-bearing capacity, and technical requirements. They compete with stainless steel SIRs (excluded from the investigation), not electrolytic products.
 - Despite the Union industry's claims of sufficient Union production capacity, no Union supplier can produce hot dip galvanized SIRs meeting ISO standards for length, functionality, and corrosion resistance. Market evidence, including Pretec's 20-year import history and supplier confirmations, validates this technical and commercial gap.
 - The Commission failed to address critical factors defining SIRs' uniqueness, such as metallurgical bonding, steel quality, and compliance with ISO/EN standards. It also incorrectly equated SIRs with other products based on shared customs codes, ignoring their distinct specifications and end-uses.
- (24) The Commission noted that, when defining the product under investigation, the complaint explicitly addressed corrosion-protective coatings, including hot dip galvanization, as relevant to products used in outdoor construction, bridges and utility structures exposed to harsh environments such as moisture, salt, and extreme weather. The complaint further acknowledged that SIRs, despite their specific galvanization process, are functionally and technically aligned with the products covered by this investigation.
- (25) The Commission emphasized that the complaint incorporated various standards (ISO, EN, DIN) defining mechanical and material specifications for steel screws, including ISO 898, which governs mechanical properties of the steel. While Pretec highlighted ISO standards like ISO 10684 and ISO 1461 for SIRs, these do not establish a separate product category. A distinct ISO standard merely reflects that SIRs may represent a non-standardized variant of headless screws, not a fundamentally different product for the purposes of this investigation. The Commission further observed that Pretec's reliance on technical requirements such as impact strength (27 Joules at – 20 °C) and compliance with corrosivity classes C3–C5 aligns with the broader scope of the investigation, as these criteria are consistent with the general principles of corrosion resistance and mechanical performance outlined in the complaint.
- (26) The product scope of this investigation encompassed threaded rods and headless screws, including those designed for specialized applications, provided they share overlapping physical, technical, and functional characteristics. The existence of binding technical specifications for specific projects (e.g., AMA Anläggning, requirements from Vattenfall and Svenska Kraftnät) did not negate the interchangeability of SIRs with other headless screws when they meet equivalent performance criteria. The Commission further noted that while SIRs may compete with stainless steel products in certain applications, the complaint explicitly addresses such competition, and the exclusion of stainless steel from the investigation does not justify the exclusion of SIRs.
- (27) The Commission acknowledged Pretec's assertion that SIRs are non-interchangeable with smaller headless screws due to differences in size, load-bearing capacity, and technical requirements. However, screws, regardless of size, often adhere to standard engineering principles and can serve similar mechanical roles (e.g., load bearing, fastening) across applications if they meet appropriate strength and safety criteria. The Commission did not find evidence that SIRs' technical specifications render them categorically non-interchangeable with other products within the scope. Furthermore, while Pretec claimed that Union producers lack the capacity to supply SIRs meeting ISO standards, the complaint's annexes and further submissions confirmed the existence of Union production capacity for hot dip galvanized threaded rods, meeting ISO standards and of larger lengths.

- (28) In light of the considerations outlined above, the Commission concluded that Pretec's request for the exclusion of SIRs from the scope of this investigation is without merit and therefore rejected. The product scope, as defined in the complaint and its annexes ⁽⁵⁾, encompasses SIRs due to their overlapping technical, functional, and regulatory characteristics with other headless screws.
- (29) Following the imposition of provisional measures, EIFI requested the Commission to include threaded rods imported under TARIC code 7308 90 98 90 ⁽⁶⁾ and used for anchor bolt cages to the product scope of the investigation, since these anchor bolt cages were misclassified. According to EIFI, misclassification would allow undue imports of Chinese threaded rods and would undermine the anti-dumping measures. According to EIFI, an anchor bolt cage is made up of primarily of high-strength bolts (classified under TARIC code 7318 15 48 90), two steel plates (foundation and distribution plates), nuts, washers, and other minor components, which are currently being imported unassembled. The use of the code 7308 90 98 90 to classify anchor bolt cages which are made with threaded rods would therefore be incorrect, since the rods mentioned in the description of the code are not elements of connection (such as threaded rods), but rather simple unthreaded bars.
- (30) The product scope was defined in the Notice of initiation. Anchor bolt cages were not covered by the complaint and therefore no evidence of dumping and resulting injury justifying an investigation has been provided by the Union industry. The argument was therefore rejected.
- (31) Following the definitive disclosure, EIFI asserted that duties should be applied pro rata to the share of threaded rods included in products imported under CN 7308 90 98 (anchor bolt cages), as these threaded rods fall within the scope of the investigation. EIFI clarified that anchor bolt cages, primarily composed of threaded rods, are required to be classified under CN 7308 90 98 under the existing Binding Tariff Information ⁽⁷⁾. Consequently, the party provided evidence that threaded rods account for the majority of the anchor cage's weight and value.
- (32) Alternatively, EIFI argued that the Commission allegedly erred in denying the request to expand the product scope to include CN 7308 90 98, which should therefore be incorporated into the anti-dumping measures. To support this, the party cited the anti-dumping investigation on sacks and bags ⁽⁸⁾, where products classified under CN codes not initially targeted in the relevant notice of initiation were later included in the scope of the proceeding.
- (33) Threaded rods assembled in anchor bolt cages were not defined within the scope of the complaint as products subject to this investigation. As such, the Union industry did not submit any evidence of dumping or injury sufficient to justify initiating an investigation into the threaded rods assembled in the anchor bolt cages. Furthermore, all interested parties were required to submit information regarding the product scope within 10 days of the Notice of Initiation's publication. No such request was submitted by the deadline, and no evidence was provided to demonstrate that threaded rods in anchor bolt cages should fall within the product description outlined in the complaint. Consequently, these threaded rods were not included in the scope of the investigation, and no information (including the import volumes and prices from the country concerned, market shares, all other relevant injury indicators, downstream use and situation of such users, etc.) was collected and analysed regarding them. While the party referred to the sacks and bags investigation ⁽⁹⁾, where products not initially targeted were later included due to meeting the product description, this case was found to be different. In the current investigation, the threaded rods in anchor bolt cages did not satisfy the product description provided in the complaint and was therefore not covered by this investigation. The claim of the party was thus rejected.

⁽⁵⁾ TRON file no. t24.008386 of 09/10/2024.

⁽⁶⁾ TARIC Code 7308 90 98 90 'Structures (excluding prefabricated buildings of heading 9406 and parts of structures (for example, bridges and bridge-sections, lock-gates, towers, lattice masts, roofs, roofing frameworks, doors and windows and their frames and thresholds for doors, shutters, balustrades, pillars and columns), of iron or steel; plates, rods, angles, shapes, sections, tubes and the like, prepared for use in structures, of iron or steel'.

⁽⁷⁾ BTI Reference: ESBTIESBTI2024SOL550, at https://ec.europa.eu/taxation_customs/dds2/ebti/ebti_home.jsp?Lang=en.

⁽⁸⁾ Council Regulation (EC) No 1950/97 of 6 October 1997 imposing a definitive anti-dumping duty on imports of sacks and bags made of polyethylene or polypropylene originating in India, Indonesia and Thailand and collecting definitively the provisional duty imposed (OJ L 276, 9. 10. 97, p. 1, ELI: <http://data.europa.eu/eli/reg/1997/1950/oj>) and Council Regulation (EC) No 2003/97 of 13 October 1997 imposing a definitive anti-dumping duty on imports of woven polyolefin sacks and bags originating in the People's Republic of China (OJ L 284, 16.10.1997, p. 1, ELI: <http://data.europa.eu/eli/reg/1997/2003/oj>).

⁽⁹⁾ Council Regulation (EC) No 1950/97 of 6 October 1997 imposing a definitive anti-dumping duty on imports of sacks and bags made of polyethylene or polypropylene originating in India, Indonesia and Thailand and collecting definitively the provisional duty imposed (OJ L 276, 9.10.97, p.1., ELI: <http://data.europa.eu/eli/reg/1997/1950/oj>).

- (34) An importer (Kohlhage) requested the Commission to consider the distinction between different products and production methods, arguing that certain products require additional steps, such as drawing of wire, cold forming of the bolt, partially threading the bolt, machining custom features on the bolt, as well as plating with zinc iron. These products are produced at significantly higher costs compared to the investigated threaded rods and studs, despite being classified under the same customs code. The importer argued that such products should be excluded from the product scope, claimed that the Commission did not provide a comparison calculation or evidence of dumping for these distinct product types.
- (35) The fact that a product can be produced using different manufacturing processes is not inherently relevant to defining the scope of a product under investigation. In this case, the additional production steps cited by the importer were already outlined in the original complaint. Furthermore, the investigation confirmed that the imported products share similar physical and technical characteristics, and basic end uses. Specific features distinguishing the products under investigation (e.g. coating and other variations) are already accounted for in the product types reported by sampled exporting producers, for which dumping margins are calculated.
- (36) Moreover, the Commission made a comparison between product types at the level of product control number (PCN), which included the main characteristics per product type and would therefore distinguish between differences relevant to cost and price of the various product types.
- (37) Therefore, there is no justification for excluding product types produced at significantly higher costs from the investigation. This claim was consequently rejected.

3. DUMPING

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

- (38) The Commission received no comments on the procedure for determining the normal value in this case under Article 2(6a) of the basic Regulation.
- (39) The Commission's provisional findings in recitals 32 to 44 of the provisional Regulation are therefore confirmed.

3.1.1. Existence of significant distortions

- (40) In the absence of any comments, the findings in Section 3.2.1 of the provisional Regulation are confirmed.

3.1.2. Representative country

- (41) Following publication of the provisional Regulation, Chinafar Group, Junyue, Brother Group and EFDA reiterated their claims that Malaysia should have been selected as a representative country instead of Thailand, maintaining that i) the Malaysian import data were more reliable than the Thai import data, and that ii) the identified Malaysian companies were more reliable, and representative compared to Thailand's. The detailed claims are set out in sections 3.1.3 to 3.1.8 below.
- (42) Brother Group and EFTA also maintained that, had the Commission carried out an assessment of the level and environmental protection, this would have shown that Thailand's record was less favourable than that of Malaysia.
- (43) Since the Commission selected Thailand as the appropriate representative country, there was no need to carry out such an assessment in accordance with the last sentence of Article 2(6a)(a) first indent of the basic Regulation.
- (44) Based on the above, the Commission's provisional findings in recitals 90 to 149 are therefore confirmed.

3.1.3. *Raw materials*

- (45) On the quality of import data of the factors of production, Chinafar Group, Junyue, Brother Group and EFDA repeated the same arguments submitted after publication of the two notes to the file on the sources for the determination of the normal value, arguing that the quality of readily available import data per HS code for Thailand was not of a higher quality than for Malaysia and that Malaysia should be selected as a representative country instead. The parties did not bring forward new evidence nor arguments to support its claims and therefore the reasons and conclusions in recitals 97 to 145 of the provisional Regulation were confirmed and the submissions rejected.
- (46) Brother Group and Junyue argued that the representative country should not be selected on the basis that it is the largest importing country of the main factors of production in terms of quantity amongst all potential countries.
- (47) The Commission based its selection of the representative country on a balanced assessment of the existence of relevant readily available data for the main raw materials, which was set out in recitals 106 to 109 of the provisional Regulation. The Commission did not only consider the absolute volume of the imports, but also the existence of imports from China and countries listed in Annex I to Regulation (EU) 2015/755 of the European Parliament and of the Council ⁽¹⁰⁾ and their impact on the average import price. Therefore, the claim was rejected.
- (48) Furthermore, Brother Group argued that the fact that the import price of raw materials from other sources into a country was similar to the import price from China is not in itself conclusive that that price is influenced by Chinese imports. As all these factors of production are commodity steel materials widely traded on the global market, it is common that the import prices into various countries or regions are similar and comparable.
- (49) To avoid the impact of Chinese significant distortions in a potential representative country, the Commission considered the possible effects of Chinese imports into the potential representative country. One of the elements that is taken into account is the similarity of import prices from other sources than China. However, this is not a stand-alone criterion but has to be seen in combination with all other facts of the case. The Commission dismissed the claim.
- (50) Following the definitive disclosure, Brother Group and Junyue reiterated that the Commission's choice of the representative country was based on a selective reading of the import statistics and on an overreliance on the import volume criterion. This claim was already addressed in the recitals 47-49 above and no new arguments or evidence was submitted. Therefore, this claim was rejected.
- (51) Chinafar Group claimed that the factor of production imported under HS code 7213 91 should be the primary consideration in selecting the representative country, as this was the main raw material used in the production of the product under investigation. Chinafar Group contended that Malaysia should be used as the representative country, since imports from China under HS code 7213 91 accounted for 30 % of Thailand's total imports of this factor of production, while they represented only 9 % of Malaysia's total imports.
- (52) As mentioned in recital 126 of the provisional Regulation, for HS code 7213 91 the total imports from undistorted sources were significant in all three countries initially selected, with Thailand having the highest absolute quantities of imports from countries other than China and countries listed in Annex I to Regulation (EU) 2015/755. For this HS code, the average import price from other sources in both Thailand and Türkiye was about 2 % higher than the import price from China and the countries listed in Annex I to Regulation (EU) 2015/755, while the average import price from other sources into Malaysia was 5 % lower than the price from China and the countries listed in Annex I to Regulation (EU) 2015/755.

⁽¹⁰⁾ Regulation (EU) 2015/755 of the European Parliament and of the Council of 29 April 2015 on common rules for imports from certain third countries (OJ L 123, 19.5.2015, p. 33, ELI: <http://data.europa.eu/eli/reg/2015/755/oj>).

- (53) Based on the significant volume of imports from undistorted sources and the limited impact of the imports from China and countries listed in Annex I to Regulation (EU) 2015/755 on the average import price, the Commission considered Thailand as a reliable and representative benchmark for this factor of production. The claim was therefore dismissed.
- (54) Following publication of the provisional Regulation, Chinafar Group, Junyue, Brother Group and EFDA reiterated their claims that, should Thailand be maintained as a representative country, Malaysia should be used as the benchmark country for some of the raw materials and in any event the Japanese-sourced imports to Thailand should be excluded due to the fact that these consist of special automotive-grade products which are not representative for the construction of the normal value of the product under investigation.
- (55) Brother Group and EFDA claimed that the import prices to Thailand of the factors of production classifiable under HS codes 7213 99 and 7214 99 were unreliable, due to the high proportion and high-priced imports from Japan, and therefore Malaysia, or alternatively Türkiye, should be used as a benchmark country. Brother Group further argued that the import price for HS code 7213 99 was significantly higher than that of HS 7213 91, despite the fact the two factors of production differed only for the cross-section diameter of the rods, and significantly higher than that of HS code 7227 90, which was an alloy steel. Based on common industrial knowledge, alloy steel would typically be more expensive than non-alloy steel. Brother Group and EFDA reached similar conclusions for HS code 7214 99 when compared with HS code 7228 30.
- (56) First, the Commission already explained in recitals 132 to 134 of the provisional Regulation why it did not consider appropriate to exclude Japanese-sourced imports from the calculation of the benchmark. Even if some of the sampled exporting producers might not have produced or sold special grade screws, the Commission confirmed its provisional finding that none of the parties brought evidence of the scale of Japanese imports to Thailand of raw materials destined for the production of non-standard screws for specialised sectors, which would justify the exclusion of these imports from the raw materials benchmarks.
- (57) Second, the Commission noted that prices between different HS codes could not be considered directly comparable because of the product mix within these codes. As an example, the difference in import price between HS codes 7213 91 and 7213 99 was not limited to the cross-section diameter but was also attributable to a higher carbon content and the presence of alloying elements in HS code 7213 99.
- (58) The fact that under a customs code some raw materials were of a better and therefore more expensive grade was not sufficient to put in question the reliability of the benchmark.
- (59) After the definitive disclosure, Brother Group, Junyue and EFDA reiterated that the benchmarks for certain steel raw materials were influenced by the high prices of imports from Japan into Thailand intended for the production of non-standard special grade screws for specialized sectors.
- (60) They argued that this was corroborated by the statistics disclosed by the Commission itself, showing that a significant portion of these raw materials originating from Japan had price levels substantially higher than those from other countries, and by the significant presence of Japanese-owned fastener manufacturers in Thailand.
- (61) Brother Group also submitted that the Chinese exporting producers of the product under investigation did not require these extremely expensive raw materials as they were not specifically supplying high-end applications, such as those in the automotive industry or the oil and gas sector.
- (62) The Commission already set out in recitals 132 to 134 of the provisional Regulation the reasons why it decided to include Japanese imports in the calculation of the raw materials benchmarks and no new arguments or evidence were brought forward in this respect. The Commission in fact found that both standard and special grade screws could be used in specialized sectors, in particular the automotive sector, and in any case the investigation covered both standard and non-standard screws. Moreover, while statistics on overall imports from Japan were available, no substantive evidence was submitted of the specific presence of specialized grade steel in standard or non-standard screws.

- (63) The Commission also noted that several Chinese exporting producers that submitted their business licence and their Article of Association had production of fasteners for the automotive sector within their business scope. Likewise, among the sampled exporting producers, there was production of high strength threaded rods for specialized sectors, such as offshore oil fields and oil pipelines, ship equipment and maintenance, and construction engineering.
- (64) Brother Group contested the Commission's assertion that the difference in import price between HS codes 7213 91 and 7213 99 was not solely due to the cross-section diameter but was also attributable to a higher carbon content and the presence of alloying elements in HS code 7213 99.
- (65) Brother Group argued that if the alleged carbon content or alloying elements did exist and were responsible for the significantly higher price of the product mix under 7213 99, this alone would make the product mix unrepresentative of the material type that the Chinese producers typically used.
- (66) The Commission's finding was based on evidence collected during the verification visits at the premises of the sampled Chinese exporting producers, more specifically on steel certificates indicating the chemical composition of the different raw materials used by the Chinese exporting producers. The analysis of the certificates showed that there were differences between the steel raw materials in terms of carbon content and presence of alloying elements.
- (67) The claims were therefore rejected and in the absence of other comments, the findings in recitals 153 to 163 of the provisional Regulation are confirmed.

3.1.4. *Labour*

- (68) Following publication of the provisional Regulation, Chinafar reiterated its claim that the benchmark for labour should be calculated on basis of annual labour cost in the representative country divided by the number of annual hours worked at Chinafar and not in the representative country.
- (69) The Commission explained in the recital 169 of the provisional Regulation the rationale behind the calculation of the benchmark of labour and why it rejected the approach proposed by Chinafar. However, Chinafar did not provide any additional arguments or evidence to support its claim. The claim is therefore rejected.
- (70) In the absence of other comments, the findings in recitals 165 to 169 of the provisional Regulation are confirmed.

3.1.5. *Electricity*

- (71) Following publication of the provisional Regulation Brother group and EFDA claimed that the undistorted cost of electricity had been wrongly calculated. They claimed that the Commission had (i) wrongly applied energy adjustment charge as an upward adjustment index instead of adding its absolute value to the base charge, (ii) wrongly classified flat tariff period as a peak period and (iii) double counted the service charge and demand charges.
- (72) After assessing the claims, the Commission accepted two of them, namely the claims concerning (i) the application of energy adjustment charge and (iii) the double counting of the service charge and demand charges. Accordingly, the Commission revised the electricity benchmark.
- (73) The Commission rejected the claim that the classification of the flat tariff period as peak tariff period was wrong. In fact, Chinese producers reported their electricity consumption in five different tariff categories: general, flat, peak, low and high. However, there are only two different tariff categories for electricity in the representative country depending on the time of the consumption: peak and off-peak. In its classification, the Commission noted that the average flat rate reported by the Chinese producers was more similar to peak rates and thus used the peak tariffs in the representative country as benchmark for consumption reported as general, flat, peak and high and used the off-peak tariff as benchmark for consumption reported as low. Brother group did not submit any evidence supporting the claim that the flat consumption should be considered as off-peak instead of peak consumption. Therefore, it was deemed more appropriate to classify the flat tariff as a peak rate.

3.1.6. *Natural gas*

- (74) In the absence of any comments, the findings in recital 175 of the provisional Regulation are confirmed.

3.1.7. *By-products*

- (75) In the absence of any comments, the findings in recital 176 of the provisional Regulation are confirmed.

3.1.8. *SG&A and profits*

- (76) Following publication of the provisional Regulation, Chinafar Group, Junyue, Brother Group and EFDA repeated that the identified Malaysian companies were more reliable, and representative compared to Thailand's.
- (77) Regarding the representativity of the Malaysian companies, the Commission already explained in recitals 143 and 144 of the provisional Regulation why it did not consider two out of the three Malaysian companies as more reliable and representative benchmarks than the Thai companies.
- (78) Following the imposition of provisional measures, Brother Group, Junyue and Chinafar Group claimed that the Commission made a mistake in disqualifying Malaysian company Tong Herr Fasteners Co. Sdn. Bhd. ('Tong Herr') as a suitable company. Junyue contended that Tong Herr's income statement showed that the company was profitable in 2024, while Brother Group asserted that the Commission could rely only on one of the two financial years overlapping with the investigation period.
- (79) The Commission noted that Junyue submitted the corporate income statement for Tong Herr Resources Bhd., rather than for Tong Herr, the group's division manufacturing fasteners. As a result, this information could not be used as evidence to demonstrate that the division was profitable in 2024.
- (80) The claim that the identified Malaysian companies were more reliable and representative compared to Thailand's was therefore rejected.
- (81) Following publication of the provisional Regulation, Chinafar Group, Junyue, Brother Group, and EFDA claimed that the Thai benchmark for SG&A and profits was unreasonably high because the Commission relied on only two companies, Sanwa Iron (Thailand) Company Ltd. and Thai Meira Co, Ltd, and because this sample was affected by the excessive profit margin of the latter, which was not representative of the normal profit level in the fasteners manufacturing sector.
- (82) Chinafar Group and Junyue reiterated their comments made at provisional stage that this unrepresentative high profit because Thai Meira's business model focused on manufacturing specialised, high-end fasteners. They also submitted that only a small share of Thai Meira's production was represented by screws without heads, and this rendered the company inadequate for the calculation of the benchmark for SG&A and profit.
- (83) First, the Commission already explained in recital 139 of the provisional Regulation that there was no evidence that the profitability of sales in specialised sectors was higher than the sales to other sectors.
- (84) Second, the Commission could not identify any companies that produced exclusively the product under investigation and consequently had to resort to companies producing a wider range of products, including the product under investigation. This applied to Thai Meira and to all other producers both in Thailand and in Malaysia. The fact that Thai Meira produced other products than the product under investigation did not undermine its suitability as representative company for the determination of a benchmark for profits and SG&A. The claim was rejected.
- (85) Chinafar Group argued that the Thai company S.J. Screws Co. Ltd. was considered a representative company in a previous anti-dumping investigation on certain iron or steel fasteners, which is a similar product to the product concerned.

- (86) The investigation period in the investigation on certain iron or steel fasteners originating in China was 1 July 2019 to 30 June 2020. Any findings in that case preceded the period considered in the current investigation. The Commission found in the current investigation that S.J. Screws Co. Ltd. was a trader, rather than a producer of the product under investigation and could therefore not be considered for the determination of a benchmark for SG&A and profit.
- (87) Chinafar Group, Junyue, Brother Group and EFDA claimed that the Commission should at least increase the number of Thai companies included in the pool of companies used for the SG&A and profit calculation in order to increase its representativity and reliability.
- (88) Junyue submitted readily available information of additional 19 Thai companies obtained from the Thai Government's Department of Business Development Data Warehouse database ⁽¹¹⁾, which provided publicly available information on companies in Thailand.
- (89) Brother Group and EFDA proposed to include two additional companies: Tycoon Worldwide Group and Thaisin Metal Industries Co., Ltd.
- (90) EFDA and Chinafar Group requested the Commission to reconsider the five companies already identified in recital 140 of the provisional Regulation. They contested the Commission's decision to exclude these companies based on their low profit level. In their view, this decision was arbitrary and unjustified.
- (91) After analysing the readily available financial data of the companies proposed by the Chinese exporters, the Commission accepted the claim as regards increasing the number of Thai companies to be included in the pool of companies to be used for the SG&A and profit calculation. As a result, the Commission included three additional companies, Thaisin Metal Industries Co., Ltd., Boonsan Fastener Limited Partnership, Yahata Fastener Thai Co., Ltd., which complied with the same criteria used to select Sanwa Iron (Thailand) Company Ltd. and Thai Meira Co, Ltd.
- (92) The Commission did not consider the other companies proposed by Junyue for the following reasons:
- (1) In the Orbis database, they were identified as wholesale and retail traders ⁽¹²⁾.
 - (2) Their weighted average profit over 2023 and 2024 showed a loss or no profit ⁽¹³⁾.
 - (3) They showed abnormal SG&A levels (from 58 % to 89 %) ⁽¹⁴⁾.
 - (4) Based on their website, they did not produce the product under investigation ⁽¹⁵⁾.
- (93) The Commission confirmed the decision not to include Tycoon Worldwide Group, since its weighted average profit over 2023 and 2024 showed a loss.
- (94) The Commission confirmed its decision to exclude the five companies identified in recital 140 of the provisional Regulation, on the basis of their low profit level (0,35 % to 1,31 %), which was considered not to be a reasonable level of profit under Article 2(6a)(a) of the basic Regulation, considering that they were operating near break-even point.
- (95) As a result, SG&A, expressed as a percentage of the Costs of Goods Sold ("COGS") and applied to the undistorted costs of production, increased from 8 % to 9,6 %. The profit expressed as a percentage of the COGS and applied to the undistorted costs of production decreased from 21,2 % to 14,8 %.

⁽¹¹⁾ <https://datawarehouse.dbd.go.th/index>, last consulted 23 July 2025.

⁽¹²⁾ Bangkok Fastener and Supply Co., Ltd., Bee Fastener Co., Ltd., Clarendon Specialty Fasteners and S. J. Screwthai Company Limited.

⁽¹³⁾ Hitech Fastener Manufacture (Thailand) Co. Ltd., Mkt Fastener (Thailand) Company Limited, Tong Heer Fasteners (Thailand) Company Limited, Ty Union Fasteners Company Limited and Bangkok Fastening Company Limited.

⁽¹⁴⁾ IT Fasteners Limited Partnership, S.K.M. Fasteners Co., Ltd.

⁽¹⁵⁾ Taiyo Fastener (Thailand) Co., Ltd, Topy Fasteners (Thailand) Ltd., Sangthong Salakphan Company Limited, Thai Mongkol Fasteners Company Limited and Mongkol Fasteners & Parts Co., Ltd.

- (96) Following the definitive disclosure, Brother Group and Junyue reiterated the claim that the identified Malaysian companies were more reliable and representative than those from Thailand. They both disagreed with the Commission's decision to disqualify Tong Herr. Brother Group submitted the 2024 income statement of this company showing a positive weighted average profit over 2023 and 2024. Junyue also claimed that the Commission completely ignored the two other Malaysian companies, Chin Well and Sanwa Iron (Malaysia), in its analysis.
- (97) The Commission found that the income statements for Tong Herr both in 2023 and 2024 included a certain amount of other income, namely of income other than sales revenue. The Commission's practice is not to consider this income component when calculating profit and SG&A ratios. Carving out the other income from the calculation would result in a loss for both years.
- (98) The Commission set out the reasons in recital 144 of the provisional Regulation why it did not consider Chin Well more reliable and representative for determining the SG&A and profit ratios than the Thai companies.
- (99) While Sanwa Iron (Malaysia) could be considered a suitable company, the Commission concluded that the broader pool of Thai companies set out in recital 91 provided a more reliable and representative dataset than the Malaysian companies.
- (100) The claims were therefore rejected.
- (101) Brother Group and EFDA disagreed with the Commission's decision to exclude certain companies on the ground that they did not produce the product under investigation. These companies manufactured products in the broader category of fasteners; moreover, none of the selected companies produced exclusively the product under investigation but also a wide range of products.
- (102) Junyue also contended that the exclusion of certain companies on an individual basis was without merit. Junyue's submission at provisional stage was based on aggregated figures representing the Thai fasteners industry as a whole. Junyue argued that any anomalies, such as low profit levels or excessively high SG&A ratios were balanced out through the aggregation of data.
- (103) Furthermore, Junyue maintained that the Commission did not provide adequate justification for excluding companies based on the Orbis database or their websites, as the General Disclosure Document (GDD) lacked supporting evidence for this decision.
- (104) First, the Commission observed that using aggregated industry data did not eliminate the necessity of conducting an individual assessment of each company's specific production and financial situation relative to the product under investigation, since this data was available. This individual assessment was essential for determining whether a company was suitable to be included in the pool of companies for the determination of profit and SG&A ratios.
- (105) Second, the information from the Orbis database was readily available, and similar data could also be obtained from the readily available Thai Data Warehouse database. Additionally, information obtained from the websites⁽¹⁶⁾ related to the companies excluded from the selection, according to point 4 of recital 92 of this Regulation, were also readily available and were not conclusive of production of the product under investigation. For the company Mongkol Fasteners & Parts Co., Ltd.⁽¹⁷⁾, the Commission could not conclude from the available information that it was a genuine producer.
- (106) Therefore, the Commission concluded that interested parties had access to the necessary evidence. Furthermore, Junyue did not bring forward any argument that would change the findings of the Commission in recitals 91 to 95.

⁽¹⁶⁾ <https://www.topy.co.th/> (last consulted 16.9.2025).
<https://www.xn--72ca6basbt6cwa6f4b1a8owe.com/> (last consulted 16.9.2025).
<https://www.thaimongkol.com> (last consulted 16.9.2025).
<https://th.nc-net.com/company/101653/> (last consulted 16.9.2025).

⁽¹⁷⁾ บริษัท มงคลฟาสเทนเนอร์สแอนด์พาร์ทส์ จำกัด | Ban Bo Thong | Facebook (last consulted 16.9.2025).

(107) The claims were therefore rejected.

3.2. Export price

(108) Following publication of the provisional Regulation, EIFI submitted comments where it agreed with the methodology applied by the Commission to establish the dumping margins. EIFI however also claimed that after the investigation period, the export prices of the Chinese exporting producer have decreased and requested that post investigation period data should be used to reassess the dumping margins.

(109) The Commission disagrees with this view. As stipulated in Article 6(1) of the basic Regulation, the investigation must cover both dumping and injury and they must be investigated simultaneously and, for the purpose of a representative finding, an investigation period must be selected. The third subparagraph of the same Article further states that information relating to a period subsequent to the investigation period should, normally, not be taken into account. It should also be noted that prices normally vary upward or downward after the investigation period. Therefore, prices variations alone are not sufficient as such to justify looking at post-investigation period data. Absent any particular reason why in this case the Commission should depart from the general rule of Article 6(1) and take into account post-investigation period data, EIFI's request was found unwarranted. Therefore, this claim was rejected.

(110) Following definitive disclosure, EIFI reiterated its comments claiming that the proposed anti-dumping duties do not reflect the level of dumping and should be reassessed based on import volumes and prices from a period subsequent to the investigation period. EIFI also claimed that the Commission did not comply with Article 6(1) of the basic Regulation by not assessing the data relating to the post investigation period for the determination of the level of the anti-dumping duties.

(111) The Commission disagreed with this view for the reasons already explained in recital 109 above. In addition, the level of dumping is established for each investigated exporting producer individually, by comparing its individual normal value with its export prices. Therefore, information submitted by EIFI concerning general fluctuations of the export prices without any detailed information regarding the sampled exporting producers' export prices, let alone their normal values, during the post-investigation period, would in any event be insufficient to reassess their dumping margins. Therefore, this claim was rejected.

3.3. Comparison

(112) Following publication of the provisional Regulation Junyue reiterated its claim that the methodology used by the Commission to establish the SG&A ratio results in unfair comparison between the normal value and the export price because the Commission did not deduct allowances such as bank charges, credit cost sea freight and sea insurance in the constructed SG&A ratio, while it deducted such costs from the calculation of Junyue's export price. Also, Chinafar supported this claim with similar arguments.

(113) Albeit Junyue also explained why it disagreed with the Commissions reasoning explained in the recitals 190-194 of the provisional Regulation, neither Junyue nor Chinafar did not provide any additional evidence to support their claims, notably there was no evidence showing that the SG & A costs of the Thai companies concerned included transport expenses for the delivery to customers.

(114) The Commission maintained that the normal value was established at the ex-works level of trade by using costs of production together with amounts for SG & A and for profit, which were considered to be reasonable for that level of trade. Therefore, no adjustments were necessary to net the normal value back to the ex-works level. Therefore, these claims are rejected and the recitals 188 and 193 to 197 of the provisional Regulation are confirmed.

(115) Following definitive disclosure, Junyue reiterated its claim concerning the comparison between its normal value and the export price. Junyue further claimed that the Commission should bear the burden of proving that the constructed benchmarks for normal value are established at the ex-works level of trade. This claim was essentially the same as already made following the Second Note and addressed in the recitals 190-194 of the provisional Regulation and no new arguments or evidence was submitted. Therefore, this claim was rejected.

3.4. Dumping margins

- (116) As described in recitals 72 and 91, following claims from interested parties, the Commission revised the dumping margins.
- (117) The definitive dumping margins expressed as a percentage of the cost, insurance and freight (CIF) Union frontier price, duty unpaid, are as follows:

Company	Definitive dumping margin (%)
Zhejiang Junyue Standard Part Co., Ltd.	54,7
Brother Group: — Jiaxing High-enter Fasteners Co., Ltd. — Zhejiang Morgan Brother Technology Co., Ltd. — Jiaxing Brother Standard Part Co., Ltd	57,1
Chinafar Group: — Jiaxing Chinafar Standard Parts Co., Ltd. — Jiangsu Zhe Fasteners Co., Ltd.	72,3
Other cooperating companies listed in Annex	59,8
All other companies	72,3

- (118) For the cooperating exporting producers outside the sample, the Commission calculated the weighted average dumping margin for the sampled exporting producers, in accordance with Article 9(6) of the basic Regulation.
- (119) As set out in recital 203 of the provisional Regulation, the level of cooperation was high. On this basis, the Commission found it appropriate to establish the dumping margin for non-cooperating exporting producers at the level of the cooperating sampled individually examined company with the highest dumping margin.

4. INJURY

4.1. Definition of the Union industry and Union production

- (120) No comments were received concerning definition of the Union industry and Union production. Therefore, the conclusions from recital 205 to 206 of provisional Regulation were confirmed.

4.2. Union consumption

- (121) No comments were received concerning Union consumption. Therefore, the conclusions from recital 207 to 209 of provisional Regulation were confirmed.

4.3. Imports from the country concerned

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

- (122) No comments were received concerning the volume and market share of the imports from the country concerned. Therefore, the conclusions from recitals 210 to 213 of provisional Regulation were confirmed.

4.3.2. Prices of the imports from the country concerned: price undercutting and price suppression

- (123) Chinafar Group contended that the sampled companies' low capacity utilization artificially inflated unit production costs (due to fixed cost allocation) and resulted in disproportionately high underselling margins. Chinafar therefore requested to recalculate the capacity utilization in accordance with industry-standard methodologies to address these concerns.

- (124) The Commission noted that underselling margins are based on the data of the three sampled companies, where fixed costs account for less than 30 % of total production costs. This proportion of fixed costs as a share of total production costs may even be considered low in relation to industry norms and data from the sector related to the product concerned. The claim that low-capacity utilization 'artificially inflates' costs was therefore unfounded, as the fixed cost allocation used for calculating underselling margins remains within acceptable parameters. The claim was therefore rejected.
- (125) No other comments were received concerning the prices of the imports from the country concerned, price undercutting and price suppression. Therefore, the conclusions from recitals 214 to 219 of provisional Regulation were confirmed.

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

- (126) No comments were received concerning the economic situation of the Union industry. Therefore, the conclusions from recitals 220 to 254 of provisional Regulation were confirmed.

5. CAUSATION

- (127) One importer, Kohlhage, contended that the Union industry faces challenges from external pressures (geopolitical tensions, sanctions, and trade barriers) and internal policy failures (insufficient productivity-enhancing measures), which have driven up inflation and production costs. It argued that anti-dumping duties on the product would not address these systemic issues and could further depress productivity in sectors reliant on imported goods, worsening inflation.
- (128) However, as stated in recital 274 of the provisional Regulation, the argument that anti-dumping measures hinder the Union industry's ability to adjust prices to cost increases is unfounded. Without dumped imports exerting downward price pressure, the Union industry could independently respond to market conditions. The claim lacked further evidence to demonstrate how anti-dumping duties would worsen productivity or inflation in the downstream sectors. Therefore, the argument was rejected.
- (129) No further comments were received concerning the causation. Therefore, the conclusions from recital 255 to 275 of provisional Regulation were confirmed.

6. LEVEL OF MEASURES

6.1. **Injury margin**

- (130) EIFI argued that the level of the provisional duties did not sufficiently address the seriousness of the injury caused by the dumped imports and did not limit the significant increase in dumped imports, which continued to exert pressure on the Union industry following the initiation of the investigation, shown by an upward trend in import volumes and a downward trend in average import prices. EIFI therefore requested a reassessment of the level of duties to fully account for these changes post-IP and to update the dumping calculation by comparing post-IP Chinese CIF prices and price offers with the constructed normal value, to determine whether the dumping margin as calculated for the IP remains appropriate under more recent market conditions.
- (131) As stated by EIFI itself, information relating to a period subsequent to the investigation period should normally not be taken into account, pursuant to Article 6(1), third subparagraph of the basic Regulation. The sole fluctuation in import volumes and prices after the investigation period did not constitute a circumstance such as making the proposed anti-dumping duty manifestly inappropriate, especially since the increase in import volumes from China also after the investigation period was assessed for the retroactive collection of definitive duties, as set out in section 8.3 below.

(132) The Commission therefore rejected the claim.

(133) No further comments were received concerning the level of measures. Therefore, the conclusions from recitals 276 to 284 of the provisional Regulation were confirmed.

(134) Therefore, the final dumping margin level and injury elimination level for the cooperating exporting producers and all other companies is as follows:

Company	Definitive anti-dumping margin (%)	Definitive injury margin (%)
Zhejiang Junyue Standard Part Co., Ltd.	54,7	196
Brother Group: — Jiaxing High-enter Fasteners Co., Ltd. — Zhejiang Morgan Brother Technology Co., Ltd. — Jiaxing Brother Standard Part Co., Ltd	57,1	211
Chinafar Group: — Jiaxing Chinafar Standard Parts Co., Ltd. — Jiangsu Zhe Fasteners Co., Ltd.	72,3	237
Other cooperating companies listed in Annex	59,8	212
All other companies	72,3	237

(135) The injury elimination level for 'other cooperating companies' and for 'all other imports originating in country concerned' is defined in the same manner as the dumping margin for these companies and imports, as set out in recital 118.

(136) As set out in recital 203 of the provisional Regulation, the level of cooperation was high. On this basis, the Commission found it appropriate to establish the dumping margin and injury elimination level for non-cooperating exporting producers at the level of the cooperating sampled individually examined company with the highest dumping margin and injury elimination level, respectively.

(137) Following definitive disclosure, EIFI claimed that 17 companies listed in the Annex should have not been considered as cooperating because these companies provided the supplementary documents requested by the Commission on 19 June 2025 late or incomplete.

(138) The Commission examined the submissions and noted that even though some of the submissions were received after the initially set deadline of 26 June 2025, the delays or deficiencies were not so significant that these companies could not be considered cooperating. Therefore, this claim was rejected.

(139) Following definitive disclosure, three additional Chinese exporting producers provided the requested supplementary documents. The Commission examined the submissions and decided to include the companies in the Annex. The Commission disclosed the amended Annex on 16 September 2025. No comments were received.

6.2. Conclusion on the level of measures

- (140) Following the above assessment, definitive anti-dumping duties should be set as below in accordance with Article 7(2) of the basic Regulation:

Company	Definitive anti-dumping margin (%)	Definitive injury margin (%)	Definitive anti-dumping duty (%)
Zhejiang Junyue Standard Part Co., Ltd.	54,7	196	54,7
Brother Group: — Jiaxing High-enter Fasteners Co., Ltd. — Zhejiang Morgan Brother Technology Co., Ltd. — Jiaxing Brother Standard Part Co., Ltd	57,1	211	57,1
Chinafar Group: — Jiaxing Chinafar Standard Parts Co., Ltd. — Jiangsu Zhe Fasteners Co., Ltd.	72,3	237	72,3
Other cooperating companies listed in Annex	59,8	212	59,8
All other companies	72,3	237	72,3

7. UNION INTEREST

7.1. Interest of suppliers to the Union industry, unrelated importers and users

- (141) Following provisional disclosure, European Steel Association EUROFER, representing suppliers of the wire rod steel substrate used in the production of screws, supported the imposition of the measures.
- (142) Additionally, EIFI presented several support letters from various entities in the upstream and downstream industries supporting the imposition of measures.
- (143) An importer, Prettec AB, argued that imposing anti-dumping duties would harm Nordic importers and end-users due to a lack of Union alternatives for hot dip galvanised SIRs of 5,8-metre lengths, raising costs and threatening infrastructure projects.
- (144) The Commission noted that imports from non-Chinese third countries already accounted for 13 % of the market during the IP, while the anti-dumping measures aim to restore fair competition, not ban Chinese imports, by also ensuring that alternatives remain available. Moreover, as provided in recital 19, the evidence from EIFI confirmed that the Union producers have the capacity to produce hot dip galvanised SIRs of size up to 6 meters, as well as to apply zinc coatings and other corrosion-protection methods, directly contradicting Prettec's claims of unavailability. These factors demonstrate that viable alternatives exist, mitigating potential market disruptions.

7.2. Conclusion on Union interest

- (145) No other comments were received concerning the Union interest. Therefore, the conclusions on the Union interest of the provisional Regulation were confirmed.

8. DEFINITIVE ANTI-DUMPING MEASURES

8.1. Definitive measures

- (146) In view of the conclusions reached with regard to dumping, injury, causation, level of measures and Union interest, and in accordance with Article 9(4) of the basic Regulation, definitive anti-dumping measures should be imposed in order to prevent further injury being caused to the Union industry by the dumped imports of the product concerned.
- (147) On the basis of the above, the definitive anti-dumping duty rates, expressed on the CIF Union border price, customs duty unpaid, should be as follows:

Company	Definitive anti-dumping duty (%)
Zhejiang Junyue Standard Part Co., Ltd.	54,7
Brother Group: — Jiaxing High-enter Fasteners Co., Ltd. — Zhejiang Morgan Brother Technology Co., Ltd. — Jiaxing Brother Standard Part Co., Ltd	57,1
Chinafar Group: — Jiaxing Chinafar Standard Parts Co., Ltd. — Jiangsu Zhe Fasteners Co., Ltd.	72,3
Other cooperating companies listed in Annex	59,8
All other companies	72,3

- (148) The individual company anti-dumping duty rates specified in this Regulation were established on the basis of the findings of this investigation. Therefore, they reflect the situation found during this investigation in respect to these companies. These duty rates are thus exclusively applicable to imports of the product under investigation originating in the country concerned and produced by the named legal entities. Imports of the product concerned manufactured by any other company not specifically mentioned in the operative part of this Regulation, including entities related to those specifically mentioned, cannot benefit from these rates and should be subject to the duty rate applicable to 'all other companies'.
- (149) A company may request the application of these individual anti-dumping duty rates if it changes subsequently the name of its entity. The request must be addressed to the Commission ⁽¹⁸⁾. The request must contain all the relevant information enabling to demonstrate that the change does not affect the right of the company to benefit from the duty rate which applies to it. If the change of name of the company does not affect its right to benefit from the duty rate which applies to it, a regulation about the change of name will be published in the *Official Journal of the European Union*.
- (150) To minimise the risks of circumvention due to the difference in duty rates, special measures are needed to ensure the proper application of the individual anti-dumping duties. The application of individual anti-dumping duties is only applicable upon presentation of a valid commercial invoice to the customs authorities of the Member States. The invoice must conform to the requirements set out in Article 1(3) of this Regulation. Until such invoice is presented, imports should be subject to the anti-dumping duty applicable to 'all other companies'.
- (151) While presentation of this invoice is necessary for the customs authorities of the Member States to apply the individual rates of anti-dumping duty to imports, it is not the only element to be taken into account by the customs authorities. Indeed, even if presented with an invoice meeting all the requirements set out in Article 1(3) of this Regulation, the customs authorities of Member States should carry out their usual checks and may, like in all other cases, require additional documents (shipping documents, etc.) for the purpose of verifying the accuracy of the particulars contained in the declaration and ensure that the subsequent application of the rate of duty is justified, in compliance with customs law.

⁽¹⁸⁾ Email: TRADE-TDI-NAME-CHANGE-REQUESTS@ec.europa.eu; European Commission, Directorate-General for Trade, Directorate G, Wetstraat 170 Rue de la Loi, 1040 Brussels, Belgium.

- (152) Should the exports by one of the companies benefiting from lower individual duty rates increase significantly in volume, in particular after the imposition of the measures concerned, such an increase in volume could be considered as constituting in itself a change in the pattern of trade due to the imposition of measures within the meaning of Article 13(1) of the basic Regulation. In such circumstances, an anti-circumvention investigation may be initiated, provided that the conditions for doing so are met. This investigation may, *inter alia*, examine the need for the removal of individual duty rate(s) and the consequent imposition of a country-wide duty.
- (153) To ensure a proper enforcement of the anti-dumping duties, the anti-dumping duty for all other companies should apply not only to the non-cooperating exporting producers in this investigation, but also to the producers which did not have exports to the Union during the investigation period.
- (154) Exporting producers that did not export the product concerned to the Union during the investigation period should be able to request the Commission to be made subject to the anti-dumping duty rate for cooperating companies not included in the sample. The Commission should grant such request provided that three conditions are met. The new exporting producer would have to demonstrate that: (i) it did not export the product concerned to the Union during the IP; (ii) it is not related to an exporting producer that did so; and (iii) has exported the product concerned thereafter or has entered into an irrevocable contractual obligation to do so in substantial quantities.

8.2. Definitive collection of the provisional duties

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

8.3. Retroactivity

- (156) As mentioned in section 1.2, the Commission made imports of the product under investigation subject to registration.
- (157) During the definitive stage of the investigation, the data collected in the context of the registration was assessed. The Commission analysed whether the criteria under Article 10(4) of the basic Regulation were met for the retroactive collection of definitive duties.
- (158) The criteria for whether duties can be collected during the period of registration are set out in Article 10(4) of the basic Regulation.
- (159) The condition in Article 10(4)(a) of the basic Regulation is fulfilled as imports were registered following the registration Regulation, then in accordance with Article 14(5) of the basic Regulation.
- (160) The importers have been given an opportunity for comment in accordance Article 10(4)(b) of the basic Regulation following the publication of the registration Regulation as well as the publication of the provisional Regulation.
- (161) No interested parties expressed their opposition to the registration. However, comments from EFDA and EIFI were received on the possible retroactive imposition of duties. EIFI indicated its agreement in collecting duties during the period of registration.
- (162) Pursuant to Article 10(4)(c) of the basic Regulation, there needs to be 'a history of dumping over an extended period, or the importer was aware of, or should have been aware of, the dumping as regards the extent of the dumping and the injury alleged or found'. In the present case, the Commission considered that the importers were aware, or should have been aware of, the dumping as regards the extent of the dumping and the injury alleged or found since the date of initiation of the investigation.
- (163) Indeed, the Notice of Initiation and the non-confidential version of the complaint contained a number of statements and items of evidence supporting and stating the extent of the dumping and injury alleged, for instance in Section 3 and 4 of the Notice of Initiation, and Section B and C.5 of the non-confidential version of the complaint. Consequently, the Commission considered that the importers and users were aware, or should have been aware, of the alleged dumping practices, the extent thereof and the alleged injury.

- (164) EFDA however argued that Union importers had no historical basis to anticipate anti-dumping measures against headless screws, as the goods in question typically require a lead time for the production and delivery of the product concerned of up to six months. For instance, imports arriving in Europe between January - March 2025 were ordered as early as July 2024, prior to the initiation of the investigation. The Commission observed that no substantiated evidence on the file of this investigation confirmed a lead time of up to six months for such imports, rendering the argument speculative and unsupported by factual data. The argument was therefore dismissed.
- (165) Furthermore, pursuant to Article 10(4)(d) of the basic Regulation, there needs to be 'a further substantial rise in imports in addition to the level of imports which caused injury during the investigation period' that in light of its timing and volume and other circumstances are likely to seriously undermine the remedial effect of the definitive duties.
- (166) The Commission's analysis showed a further substantial rise in imports in addition to the level of imports which caused injury during the investigation period, as prescribed by Article 10(4)(d) of the basic Regulation.
- (167) For this analysis, the Commission compared the monthly average import volumes of the product concerned during the investigation period with the average monthly import volumes and prices after initiation (during the period from November 2024 to June 2025), distinguishing between (i) the first full months following the initiation of the investigation up to the last full month when the registration took place (November 2024 to January 2025) and (ii) the first full months following the initiation of the investigation up to the last full month when provisional measures were adopted (November 2024 to June 2025).

Table 1

Imports of headless screws from China

	Average tonnes per month	Average Price (EUR/tonne)
Investigation period (July 2023 to June 2024)	9 360	1 213
Investigation period (November 2023 to January 2024)	8 768	1 141
Investigation period (November 2023 to June 2024)	8 978	1 199
Investigation period (February to June 2024)	9 105	1 233
Post-investigation period (November 2024 to January 2025)	13 458	1 109
Post-investigation period (November 2024 to June 2025)	13 427	1 104
Post-investigation period (February to June 2025)	13 408	1 101

Source: Surveillance 3 database (*).

(*) Extract of 7.7.2025.

- (168) The average monthly import volume from China during the investigation period was 9 360 tonnes. The average monthly import volume from China in the period starting in the first full month after publication of the Notice of initiation of the investigation in the Official Journal of the European Union and ending in the last full month up to the last full month when the registration took place (November 2024 to January 2025) was 13 458 tonnes, 44 % higher than in the investigation period. When comparing the imports after the investigation period with the same months during the investigation period (i.e. November 2023 to January 2024, with a monthly average import volume of 8 768 tonnes), to avoid any differences in seasonality, the change in monthly average is even higher at an increase of 53 %.

- (169) The same trend can be seen when comparing the imports during the investigation period with the period following the initiation of the case up to the last full month when provisional measures were adopted.
- (170) The average monthly import volume from China in the period starting in the first full month after publication of the Notice of initiation of the investigation in the Official Journal of the European Union and ending in the last full month preceding the imposition of provisional measures (November 2024 to June 2025) was 13 427 tonnes, 43 % higher than in the investigation period. When comparing the imports after the investigation period with the same months during the investigation period (i.e. November 2023 to June 2024, with a monthly average import volume of 8 978 tonnes), the increase in monthly average is 50 %.
- (171) Therefore, the Commission concluded that there was a substantial increase in imports volumes after initiation.
- (172) EFDA argued that the observed increase in import volumes during the early months of 2025, particularly in January and February, aligns with normal seasonal patterns in the industry, as companies typically reduce stock levels in November and December for year-end inventory management and subsequently replenish supplies in the first months of the year. This fluctuation is unrelated to the anti-dumping investigation and instead reflects routine market behaviour. The Commission however rejected the argument, since it also compared identical periods during and post-IP, in particular the early months of each year and therefore the seasonal effects were reflected in the comparison.
- (173) EFDA argued that the IP saw unusually low import volumes due to post-pandemic excess stock in the Union warehouses, driven by supply chain disruptions and delayed shipments that led to stockpiling. The subsequent increase in imports after the IP reflects a market correction as inventories return to typical levels, rather than an abnormal trend. The Commission dismissed the argument, since, as noted in recital 212 of the provisional regulation, the import volumes increased during the IP in relation to 2023 despite demand in the Union remaining low during the IP.
- (174) Moreover, the Commission noted that the average price of imports decreased following the initiation of the investigation. When comparing (i) the first full months following the initiation of the investigation up to the last full month when the registration took place with the average price in the IP, a decrease of 8,6 % in price is shown from 1 213 EUR/tonne to 1 109 EUR/tonne, and when comparing (ii) the first full months following the initiation of the investigation up to the last full month when provisional measures were adopted with the average price in the IP, a decrease of 9 % in price is found (from 1 213 EUR/tonne to 1 104 EUR/tonne).
- (175) In view of the foregoing the Commission could conclude that the rise of imports was likely to seriously undermine the remedial effect of the definitive anti-dumping duty to be applied, within the meaning of Article 10(4)(d) of the basic Regulation.
- (176) Consequently, the Commission concluded that all the conditions for retroactive collection are met. A definitive anti-dumping duty should therefore be levied on the product concerned, which was made subject to registration by Implementing Regulation (EU) 2025/141.
- (177) The level of the duty to be collected retroactively should be set at the level of the definitive duty included in Article 1(2) below.
- (178) Following the definitive disclosure, EFDA, supported by Junyue and Chinafar Groups, challenged the retroactive application of duties under Article 10(4)(c) of the basic Regulation, arguing that the conditions for retroactive imposition were not satisfied as there was no evidence of sustained dumping over an extended period for the product under investigation. Therefore, importers were neither aware of the alleged dumping nor the extent of the injury claimed, particularly given the product's explicit exclusion from the prior anti-dumping investigation on certain iron or steel fasteners ⁽¹⁹⁾.

⁽¹⁹⁾ Commission Implementing Regulation (EU) 2022/191 of 16 February 2022 imposing a definitive anti-dumping duty on imports of certain iron or steel fasteners originating in the People's Republic of China (OJ L 36, 17.2.2022, pp. 1. ELI: http://data.europa.eu/eli/reg_impl/2022/191/oj).

- (179) EFDA emphasized that most importers are small and medium-sized enterprises ('SMEs') with limited capacity to independently assess dumping risks. These entities typically operate under the assumption that imported products are fairly priced, and it would be unreasonable to expect SMEs to proactively take precautionary measures against dumping for products not previously subject to anti-dumping scrutiny, as well as to penalize them. The surge in imports following the investigation's initiation was primarily due to supply chain lead times, lasting up to eight months between the order's issuance and customs clearance, rather than intentional circumvention. Therefore, they claimed that imports to the Union in January to March 2025 were ordered as early as May to July 2024. They noted that the lead times should be taken into account when analysing the necessity of the retroactive application of duties in other investigations ⁽²⁰⁾.
- (180) EFDA also highlighted that import volumes of the product under investigation began to decline from February 2025, signalling a return to normalized trade flows. Alongside, import prices have steadily increased, indicating that market conditions are naturally readjusting. These developments, they contended, further undermined the justification for retroactive duties.
- (181) EIFI disputed the claim of six-month lead times between order placement and customs clearance, providing information for shorter lead times in 2024. It argued that the 153-day gap between the investigation's initiation (17 October 2024) and the beginning of the retroactive anti-dumping duty application (19 March 2025) meant that orders for imports subject to duties were placed after the initiation of the investigation, when importers were aware of the alleged dumping and injury. EIFI emphasized that the trend in imports showed a sharp rise in Chinese imports of screws without heads starting in July 2024 (12 694-22 584 tonnes/month), compared to pre-July 2023 levels (6 510-11 449 tonnes/month). This trend indicated market awareness of the impending anti-dumping complaint, with importers front-loading shipments to avoid duties. EIFI further asserted that importers knowingly assumed the risk of retroactive duties despite this awareness and now seek to evade liability by citing speculative lead times.
- (182) EIFI also disputed claims that the surge in Chinese imports in 2024-2025 reflected post-pandemic stock adjustments or seasonal patterns, arguing it stemmed from market anticipation of the anti-dumping complaint. The 109 % year-on-year increase in the first quarter 2025 and a sustained price decline (1 302 €/tonne in 2023 to 1 093 €/tonne by mid-2025) contested assertions of temporary or cyclical behaviour. EIFI emphasized that the surge and pricing trends correlated with the upcoming investigation, invalidating alternative explanations and underscoring the need for retroactive duties to address predatory imports.
- (183) The Commission recalled that Article 10(4)(d) of the basic Regulation refers to 'imports' and not 'orders' that are likely to seriously undermine the remedial effect of the definitive anti-dumping duty to be applied. These imports must be assessed for their timing, volume, and potential to undermine the remedial effect of anti-dumping duties. Article 10(4)(c) hinges on importer awareness of dumping, but stresses that retroactive duties are not punitive. Instead, their purpose is to preserve the effectiveness of anti-dumping measures by addressing imports that, as a whole, risk undermining their remedial impact. The assessment under Article 10(4)(d) prioritizes the objective effect of import volumes and market dynamics over individual importers' subjective intentions or lead times ⁽²¹⁾.
- (184) In the current investigation, the Commission acknowledged that several months may have elapsed between the order and the import date. It reviewed the evidence submitted by the parties regarding supply chain lead times for the product under investigation but largely rejected it as unsubstantiated or incomplete. Key deficiencies included missing orders and/or corresponding invoices followed by customs documentation in certain cases. Additionally, some importers providing information failed to cooperate with this investigation, leaving their total import volumes to the Union unknown. Consequently, the information submitted by the cooperating importers represented less than 5 % of total imports of the product under investigation to the Union during the investigation period. Therefore, in addition to being essentially irrelevant in view of the principles recalled in recital 183, the Commission did not consider the data sufficiently representative to assume that all other importers were in the similar situation.

⁽²⁰⁾ E.g. in Commission Implementing Regulation (EU) 2025/45 of 8 January 2025 imposing a definitive anti-dumping duty and definitely collecting the provisional duty imposed on imports of mobile access equipment originating in the People's Republic of China (OJ L, 2025/45, 9.1.2025, ELI: http://data.europa.eu/eli/reg_impl/2025/45/oj).

⁽²¹⁾ On this point, the Commission refers to Judgment of 8 May 2019, *Stemcor London Ltd and Samac Steel Supplies Ltd v European Commission*, Case T-749/16, ECLI:EU:T:2019:310.

- (185) In view of the Commission's analysis of substantial rise in imports after the investigation period, it considered that, while some of the deliveries from November 2024 to February 2025 could partially be due to pre-investigation orders placed before October 2024, this explanation was insufficient to account for the sustained surge in imports, which amounted to a 47 % increase from February to June 2025 compared to the same period in 2024. Additionally, the Commission observed an 11 % decrease in the average import price of the product during February-June 2025 compared to February-June 2024, a trend inconsistent with EFDA's assertion of market normalization. This price decline, combined with the surge in import volumes, directly undermined the parties' argument that trade flows had naturally readjusted after February 2025.
- (186) Furthermore, EFDA's claim that imports to the Union in January-March 2025 were ordered as early as May-July 2024 was found incorrect upon analysis of the average import price. If the claim was accurate, the average import price in January-March 2025 (1 057 EUR/tonne) should have aligned with the price range of May-July 2024 (1 218 EUR/tonne) or earlier, but instead was 13 % lower.
- (187) The Commission rejected the parties' argument regarding the exclusion of the product under investigation from the prior anti-dumping investigation on certain iron or steel fasteners, as irrelevant to the current proceeding. Under established practice and Article 10(4)(c) of the Basic Regulation, each investigation is confined to the product scope defined in the complaint. The absence of screws or bolts in the prior complaint did not negate the current investigation's validity, as the scope of any proceeding is determined solely by the specific allegations and evidence presented in the complaint at issue. Furthermore, the Commission emphasized that the industries producing screws without heads and those producing other iron or steel fasteners are distinct in terms of production processes, market functions, and injury. The parties' reliance on the prior exclusion is therefore misplaced, as it conflated unrelated investigations with different product scopes. This argument was accordingly dismissed as factually and legally unsubstantiated.
- (188) Considering the above, the Commission concluded that the retroactive application of duties is justified, as the evidence demonstrated that the surge in imports and the timing of deliveries could not be reconciled with lead times and the conditions for retroactive imposition under Article 10(4)(c) of the Basic Regulation have been satisfied.
- (189) Pursuant to Article 10(4) of the basic Regulation, the retroactive application of the duty is levied from 19 March 2025.

9. FINAL PROVISION

- (190) In view of Article 109 of Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council ⁽²²⁾, when an amount is to be reimbursed following a judgment of the Court of Justice of the European Union, the interest to be paid should be the rate applied by the European Central Bank to its principal refinancing operations, as published in the C series of the *Official Journal of the European Union* on the first calendar day of each month.
- (191) The measures provided for in this regulation are in accordance with the opinion of the Committee established by Article 15(1) of Regulation (EU) 2016/1036,

HAS ADOPTED THIS REGULATION:

Article 1

1. A definitive anti-dumping duty is imposed on imports of screws and bolts, whether or not with their nuts and washers, without heads, of iron or steel other than stainless steel, regardless of tensile strength, excluding coach screws and other wood screws, screw hooks and screw rings, self-tapping screws, and screws and bolts for fixing railway track construction material, currently falling under CN codes 7318 15 42 and 7318 15 48 and originating in the People's Republic of China.

⁽²²⁾ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast) (OJ L, 2024/2509, 26.9.2024, ELI: <http://data.europa.eu/eli/reg/2024/2509/oj>).

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

Company	Definitive anti-dumping duty (%)	TARIC additional code
Zhejiang Junyue Standard Part Co., Ltd.	54,7	89ML
Brother Group: — Jiaxing High-enter Fasteners Co., Ltd. — Zhejiang Morgan Brother Technology Co., Ltd. — Jiaxing Brother Standard Part Co., Ltd	57,1	89MM
Chinafar Group: — Jiaxing Chinafar Standard Parts Co., Ltd. — Jiangsu Zhe Fasteners Co., Ltd.	72,3	89MN
Other cooperating companies listed in Annex	59,8	See Annex
All other companies	72,3	8 999

3. The application of the individual duty rates specified for the companies mentioned in paragraph 2 shall be conditional upon presentation to the Member States' customs authorities of a valid commercial invoice, on which shall appear a declaration dated and signed by an official of the entity issuing such invoice, identified by name and function, drafted as follows: *'I, the undersigned, certify that the tonnes of screws without heads sold for export to the European Union covered by this invoice was manufactured by (company name and address) (TARIC additional code) in the People's Republic of China. I declare that the information provided in this invoice is complete and correct.'* Until such invoice is presented, the duty applicable to all other companies shall apply.

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

Article 2

The amounts secured by way of the provisional anti-dumping duty under Commission Implementing Regulation (EU) 2025/1189 of 13 June 2025 imposing a provisional anti-dumping duty on imports of screws without heads originating in the People's Republic of China shall be definitively collected. The amounts secured in excess of the definitive rates of the anti-dumping duty shall be released.

Article 3

A definitive anti-dumping duty is imposed on imports of screws and bolts, whether or not with their nuts and washers, without heads, of iron or steel other than stainless steel, regardless of tensile strength, excluding coach screws and other wood screws, screw hooks and screw rings, self-tapping screws, and screws and bolts for fixing railway track construction material, currently falling under CN codes 7318 15 42 and 7318 15 48 and originating in the People's Republic of China, which were registered under Implementing Regulation (EU) 2025/141 at the rates set out in Article 1(2). The duty is applicable as from 19 March 2025.

Article 4

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

- (a) it did not export the goods described in Article 1(1) during the period of investigation (1 July 2023 to 30 June 2024);
- (b) it is not related to an exporter or producer subject to the measures imposed by this Regulation, and which could have cooperated in the original investigation; and
- (c) it has either actually exported the product concerned or has entered into an irrevocable contractual obligation to export a significant quantity to the Union after the end of the period of investigation.

Article 5

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

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

Done at Brussels, 22 October 2025.

For the Commission
The President
Ursula VON DER LEYEN

ANNEX

Chinese cooperating exporting producers not sampled

Name	TARIC additional code
ANHUI GOODLINK FASTENER CO., Ltd.	89MO
CELO Suzhou Precision Fasteners Co., Ltd.	89MP
CHANGZHOU MIKI HARDWARE TECHNOLOGY CO., Ltd.	89MQ
Cixi Jinmao Fastener Co., Ltd.	89MR
Eagle Metalware Co., Ltd.	89MT
EVERGREEN (ZHEJIANG) INTELLIGENT MANUFACTURING CO., Ltd.	89MW
FASTWELL METAL PRODUCTS CO., Ltd.	89MX
HAI YAN MACHINERY CO., Ltd.	89MZ
Haining Xinxing Fasteners Co., Ltd.	89NB
Haining Zhongheng Metal Products Co., Ltd.	89NC
HAIYAN LONGCHENG STANDARD PARTS CO., Ltd.	89ND
HAIYAN BOLT CO., Ltd.	89NE
Haiyan C&F Fittings Co., Ltd.	89NF
Haiyan Jiamei Hardware Manufacturing and Tech. Co., Ltd.	89NG
HAIYAN JINNIU FASTENERS CO., Ltd.	89NH
HAIYAN LONGSHENG HARDWARE CO., Ltd.	89NI
Haiyan Wancheng Fasteners Co., Ltd.	89NJ
Haiyan Wandefu Precision Hardware Co., Ltd.	89NK
Haiyan Xingang Standard Parts Co., Ltd.	89NL
Haiyan Xinyuan Technology Co., Ltd.	89NN
Haiyan Xinyue Electrical Appliances Co., Ltd.	89NO
HAIYAN YINGJIE FASTENER CO., Ltd.	89NP
Haiyan Yuanzhong Hardware Co., Ltd.	89NR
Handan Changfa Fastener Manufacturing Co., Ltd.	89NS
Handan City Daoning Fastener Manufacturing Co., Ltd.	89NT
Handan Haosheng Fastener Co., Ltd.	89NV
HANDAN MINGXIN METAL PRODUCTS CO., Ltd.	89NX
HANDAN TONGHE FASTENER MANUFACTURE CO., Ltd.	89NY
Handan Xiaojun Fastener Manufacturing Co., Ltd.	89NZ
Handan Xingbang Fastener Co., Ltd.	89OA
Handan Yaofeng Fastener Manufacturing Co., Ltd.	89OB
Handan Yongnian Hongji Machinery Parts Co., Ltd.	89OC
Handan Zhonglong Fastener Manufacturing Co., Ltd.	89OD
Hebei Chengyi Engineering Materials Co., Ltd.	89OE
Hebei Fuao Fastener Manufacturing Co., Ltd.	89OF
Hebei Goodfix Industrial Co., Ltd.	89OG

Name	TARIC additional code
HEBEI YUETONG FASTENERS MANUFACTURING CO., Ltd.	89OI
Jiangsu Hengyue Hardware Co., Ltd.	89OJ
JIANGSU LIRUNYOU MACHINERY TECHNOLOGY CO., Ltd.	89OK
JIASHAN SANXIN FASTENER Co., Ltd.	89OM
Jiashan Tianyang Fastener Co., Ltd	89ON
JIASHAN WEIJIE HARDWARE CO., Ltd.	89OO
Jiaxing Aerotec Precision Co., Ltd.	89OP
JIAXING BROTHER UNITED FASTENER CO., Ltd.	89OQ
JIAXING CHUANGLI HARDWARE CO., Ltd.	89OR
JIAXING EXCELLENT FASTENER CO., Ltd.	89OS
JIAXING GOOD METAL TECHNOLOGY CO., Ltd.	89OT
JIAXING HONGJIAN TECHNOLOGY CO., Ltd.	89OU
JIAXING JIAWEI MACHINERY TECHNOLOGY COMPANY, Ltd.	89OV
JIAXING JINYU FASTENER FACTORY, Ltd.	89OW
Jiaxing Jiuli Precision Manufacturing Co., Ltd.	89OX
Jiaxing Julong Hardware Technology Co., Ltd.	89OY
JIAXING KINFAST HARDWARE CO., Ltd.	89OZ
JIAXING LONGFIX FASTENERS CO., Ltd.	89PA
JIASHAN PAILONG METAL PRODUCTS CO., LTD.	89XE
JIAXING RISEN HARDWARE CO., Ltd.	89PC
JIAXING SUNFAST METAL CO., Ltd.	89PD
JIAXING YIDA NEW MATERIAL TECHNOLOGY CO., Ltd.	89PE
Jinan Star Fastener Co., Ltd.	89PF
JOYSTART AUTOMOTIVE PARTS CO., Ltd.	89PG
Langxi Longwei Metal Technology Co., Ltd.	89PH
Langxi Mingfeng Fasteners Co.,Ltd	89XF
Lianyungang Jinyu Hardware Co., Ltd.	89PI
LIANYUNGANG PINGXIN FASTENER COMPANY LIMITED	89PJ
Lianyungang Xincheng hardware Co., Ltd.	89PK
LYG Dragonscrew Co., Ltd.	89PL
MIANXUAN FASTENERS CO., Ltd.	89PM
NEDSCHROEF FASTENERS (KUNSHAN) CO., Ltd.	89PN
Ningbo Da Zhi Machine Technology CO., Ltd.	89PO
Ningbo Jinding Fastening Piece CO., Ltd.	89PR
NINGBO LEMNA PRODUCT TECHNOLOGY CO., Ltd.	89PS
Ningbo Sardis Hardware Products Co., Ltd.	89PT
NINGBO YINZHOU HAIYUN METAL PRODUCTS CO., Ltd.	89PV
Ningbo Zhenghai Yongding Fastener Co., Ltd.	89PW
NINGBO ZHENHAI DINGLI FASTENER SCREW CO., Ltd.	89PX

Name	TARIC additional code
Ningbo Zhongjiang High Strength Bolts Co., Ltd.	89PY
OK TECH CO., Ltd.	89PZ
PINGHU DRAGON FASTENER CO., Ltd.	89QA
QIFENG PRECISION INDUSTRY SCI-TECH CORP.	89QC
Qingdao Super Star Tools Co., Ltd.	89QD
QINGDAO VANKU INDUSTRY GROUP	89QE
QINGDAO XINHUA HARDWARE PRODUCTS CO., Ltd.	89QF
SHANGHAI FIRM METAL CO., Ltd.	89QG
Shanghai Kingpluse Industry Co., Ltd.	89QH
Shanghai Moutain Industries Co., Ltd.	89QJ
SHANGHAI ROMAX HARDWARE CO., Ltd.	89QK
SHANGRAO CITY YIWEN FASTENER CO., LIMITED	89QL
Suzhou YNK Fastener Co., Ltd.	89QM
T&Y Hardware Industry Co., Ltd.	89QN
TAISHAN DONYI HARDWARE CO., Ltd.	89QO
TANDL INDUSTRY CO., Ltd.	89QP
Xingtai Mindu Industrial Co. Ltd.	89QQ
Yongnian Country Tianbang Fasteners Co., Ltd.	89QR
Zhejiang Cooper Turner Beck Green Energy Co., Ltd.	89QT
Zhejiang Donghe Machinery Technology Corporation Limited	89QV
ZHEJIANG EXCELLENT INDUSTRIES CO., Ltd.	89QW
Zhejiang Haixun Precision Technology Co., Ltd.	89QX
ZHEJIANG HYSTRON AUTO PARTS CO., Ltd.	89QY
ZHEJIANG NEW SHENGDA FASTENER CO., Ltd.	89QZ