



COMMISSION IMPLEMENTING REGULATION (EU) 2026/244

of 3 February 2026

imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of high-pressure seamless steel cylinders originating in 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 ⁽¹⁾ ('the basic Regulation'), and in particular Article 9(4) thereof,

Whereas:

1. PROCEDURE

1.1. Initiation

- (1) On 6 December 2024, the European Commission ('the Commission') initiated an anti-dumping investigation with regard to imports of high-pressure seamless steel cylinders ('HPSC') originating in the People's Republic of China ('the country concerned') 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 24 October 2024 by five companies, Cylinders Holding a.s., Dalmine S.p.A. (Tenaris), Eurocylinder Systems AG, Faber Industrie S.p.A., and Worthington Cylinders GmbH ('the complainants'). The complaint was made by the Union industry of high-pressure seamless steel cylinders 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) 2025/531 ⁽³⁾ ('the registration Regulation').

1.3. Provisional measures

- (4) In accordance with Article 19a of the basic Regulation, on 11 July 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. One sampled exporting producer submitted comments relating to the calculation of the export price and CIF values used for the calculation of its dumping margin. After analysis, these comments were accepted, and the dumping margins were corrected accordingly.
- (5) On 5 August 2025, the Commission imposed provisional anti-dumping duties on imports of high-pressure seamless steel cylinders originating in People's Republic of China by Commission Implementing Regulation (EU) 2025/1711 ⁽⁴⁾ ('the provisional Regulation').

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

⁽²⁾ Notice of initiation of an anti-dumping proceeding concerning imports of high-pressure seamless steel cylinders originating in the People's Republic of China (OJ C, C/2024/7403, 6.12.2024, ELI: <http://data.europa.eu/eli/C/2024/7403/oj>).

⁽³⁾ Commission Implementing Regulation (EU) 2025/531 of 24 March 2025 making imports of high-pressure seamless steel cylinders originating in the People's Republic of China subject to registration (OJ L, 2025/531, 25.3.2025, ELI: http://data.europa.eu/eli/reg_impl/2025/531/oj).

⁽⁴⁾ Commission Implementing Regulation (EU) 2025/1711 of 4 August 2025 imposing a provisional anti-dumping duty on imports of high-pressure seamless steel cylinders originating in the People's Republic of China (OJ L, 2025/1711, 5.8.2025, ELI: http://data.europa.eu/eli/reg_impl/2025/1711/oj).

1.4. Subsequent procedure

- (6) Following the disclosure of the essential facts and considerations on the basis of which the provisional anti-dumping duty was imposed ('provisional disclosure'), Leebucc (Tianjin) Hydraulics Equipment Co., Ltd. (an unrelated trader in the People's Republic of China), two sampled exporting producers in the People's Republic of China: Tianjin Tianhai High Pressure Container Corp., Ltd. ('Tianjin Tianhai') and Zhejiang Winner Fire Fighting Equipment Co., Ltd., ('Zhejiang Winner'), the European Cylinder Manufacturer Association (the 'complainants') and two companies users of the product under investigation: Widmann Gase GmbH and Hydac Technology GmbH filed written submissions making their views known on the provisional findings within the deadline provided by Article 2(1) of the provisional Regulation.
- (7) The parties who so requested were granted an opportunity to be heard. Hearings took place with Tianjin Tianhai and the Shaoxing Ruiying High Pressure Vessel Co., Ltd. ('Ruiying'), which is a Swedish Chinese joint venture producing seamless cylinders for CO₂ extinguishers and high-pressure gas cylinders. Additionally, further to the request of Tianjin Tianhai, a hearing was held with the European Committee of the Manufacturers of Fire Protection Equipment and Fire Fighting Vehicles ('EUROFEU') and the Bundesverband Technischer Brandschutz ('BVFA') two associations representing European fire safety and firefighting equipment manufacturers.
- (8) The Commission continued to seek and verify all the information it deemed necessary for its final 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 high-pressure seamless steel cylinders originating in People's Republic of China ('final disclosure'). All parties were granted a period within which they could make comments on the final disclosure.

1.5. Claims on initiation

- (10) In the absence of comments concerning initiation, recitals 1 to 2 of the provisional Regulation were confirmed.

1.6. Sampling

- (11) Following the publication of the provisional Regulation, an exporting producer, Shaoxing Ruiying High Pressure Vessel Co., Ltd. ('Ruiying') claimed an individual examination under Article 17(3) of the basic Regulation. This request was rejected on the ground that first, Ruiying did not provide a reply to the sampling form and second, this claim was introduced well beyond the 30 days of the date of notification of the sample set out in the in the Notice of Initiation.
- (12) In the absence of comments regarding the sampling of Union producers and exporting producers, recitals 6 to 15 of the provisional Regulation were confirmed.

1.7. Questionnaire replies and verification visits

- (13) In the absence of comments concerning the questionnaire replies and verification visits, recitals 16 to 19 of the provisional Regulation were confirmed.

1.8. Investigation period and period considered

- (14) As stated in Section 1.6. of the provisional Regulation, the investigation of dumping and injury covered the period from 1 October 2023 to 30 September 2024 ('the investigation period' or 'IP'). 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').
- (15) In the absence of comments concerning the investigation period and period considered, recital 20 of the provisional Regulation was confirmed.

2. PRODUCT CONCERNED AND LIKE PRODUCT

2.1. Product under investigation

- (16) As set out in recitals 21 to 23 of the provisional Regulation, the product under investigation are empty high-pressure seamless steel cylinders ('HPSC'), including empty HPSC used in fire extinguishers, for compressed or liquefied gas, of steel, of all diameters and volume capacities, whether or not threaded, regardless of internal coating or plating, regardless of external finishing and shape, whether or not with a gas bladder inserted, regardless of the cylinders' fitting with a valve, neck ring, foot ring or piping, whether or not fastened together to form a bundle.
- (17) Non-refillable cylinders of capacities up to and including 120 ml, covered by European standard EN 16509:2014 and/or UN-number 2037 assigned by the United Nations Committee of Experts on the Transport of Dangerous Goods, are excluded from the product scope.
- (18) To prevent any misunderstanding in the context of this procedure, it is hereby clarified that any reference to 'fire extinguishers' shall be understood as referring to empty HPSC intended for use in fire extinguishers.

2.2. Product concerned

- (19) As set out in recital 24 of the provisional Regulation, the product concerned is high-pressure seamless cylinders for compressed or liquefied gas, of steel, originating in the People's Republic of China ('the product concerned').
- (20) As indicated in the provisional Regulation, the Commission clarified that the scope covers empty but not filled fire extinguishers. For empty fire extinguishers meeting the product definition, specific TARIC codes (8424 10 00 11 and 8424 10 00 21) were included for their identification and monitoring.
- (21) After provisional measures were imposed, the Commission identified a potential issue concerning the classification of certain HPSC imported as components of fire extinguishers or machineries, under CN codes 8424 90 80 and 8479 90 70 respectively. Because these codes are basket codes covering multiple products, the Commission had to make an estimation to evaluate the potential volume of HPSC imports falling under them.
- (22) However, to prevent circumvention of the anti-dumping measures, the Commission proposes to create specific TARIC codes under these headings to ensure that HPSC cannot be imported under these broad basket codes without being subject to the measures, thereby securing the effectiveness of the anti-dumping measures.
- (23) The CN and TARIC codes covering the scope of this investigation, which are given for information only and without prejudice to a subsequent change in the tariff classification, are the following: CN codes ex 7311 00 11, ex 7311 00 13, ex 7311 00 19, ex 7311 00 30, ex 8424 10 00, ex 8424 90 80 and ex 8479 90 70 (TARIC codes 7311 00 11 15, 7311 00 11 80, 7311 00 13 15, 7311 00 13 80, 7311 00 19 15, 7311 00 19 80, 7311 00 30 15, 7311 00 30 80, 8424 10 00 11, 8424 10 00 21, 8424 90 80 60 and 8479 90 70 60).

2.3. Like product

- (24) In recitals 25 to 26 of the provisional Regulation, the Commission provisionally concluded that the product concerned, the product produced and sold on the domestic market of the PRC; and the product under investigation produced and sold in the Union by the Union industry were therefore like products within the meaning of Article 1(4) of the basic Regulation. In the absence of comments, the provisional conclusions were confirmed.

2.4. Claims regarding the product scope

2.4.1. Claim to exclude 'accumulator shells'

- (25) Accumulator shells are components of hydraulic bladder accumulators used in hydraulic machinery and power units. Besides the HPSC, which can be sourced in the Union or imported, most other components, such as rubber bladders and fluid or gas ports, are produced and assembled in the Union.
- (26) Following provisional disclosure, the cooperating non-sampled exporter Leebucc (Tianjin) Hydraulics Equipment Co., Ltd., ('Leebucc'), and a supporting importer Hydac Technology GmbH, claimed that the product definition in the Notice of Initiation lacked sufficient precision, resulting in the erroneous inclusion of accumulator shells. It alleged that accumulator shells have distinct characteristics, additional components, and different end uses compared with HPSC. It referred to the treatment of fire extinguishers and the Commission's approach in the biodiesel case ⁽⁹⁾ as precedents supporting their exclusion, arguing that accumulator shells are semi-finished products that cannot circulate freely in the Union market and that comparing them with finished HPSC would distort proper price comparison.
- (27) The Commission noted however that accumulator shells are covered by the product definition and separately identified in the product control numbers ('PCN') used for the dumping and injury analysis. The Commission also noted that the presence of additional parts or specifications, or the application of different technical norms depending on end-use, does not alter the basic physical, chemical, or technical characteristics of the product.
- (28) In addition, the Commission rejected the analogy with fire extinguishers, which, although subject to distinct technical standards, were not excluded from the HPSC investigation either.
- (29) Analogies with the bicycle and biodiesel cases were also dismissed. Unlike those cases, accumulator shells and other HPSC are an integral part of one single investigation and share the same fundamental characteristics, whereas Sustainable Aviation Fuel in the biodiesel case for instance had different distinct basic characteristics notably from a chemical point of view.
- (30) Furthermore, regarding the claims that accumulator shells are 'unfinished' and not freely circulating in the market, the Commission confirmed that the product scope is determined by inherent product characteristics rather than market perception or the presence of additional specifications. The product definition covers cylinders regardless of threading, internal coating, external finishing, or shape, and cylinders meeting these criteria are fully in-scope.
- (31) It was further noted that market considerations, including market share of a product or the number of suppliers, are not decisive for defining the product scope. The small market share of accumulator shells and the limited number of Union suppliers do not alter the fact that they are integral part of HPSC.
- (32) On this basis, the Commission concluded that the arguments raised by Leebucc and the supporting importer do not warrant any change to the product scope. The claims for exclusion of accumulator shells were therefore rejected.

2.4.2. Request of surveillance measures on filled HPSC including fire extinguishers

- (33) The complainants claimed that following the exclusion of filled fire extinguishers from the product scope and despite the Commission explanations outlined in recital 36 of the provisional Regulation that 'considering the particularly costly and cumbersome safety and security requirements applicable to the intercontinental transport of highly hazardous goods such as filled high-pressure seamless cylinders, the alleged risks of circumvention were found to be limited', there was still a risk of avoiding the payments of anti-dumping duties by importing HPSC declared as filled or filled with a non-hazardous substance other than a mixture of gas so as to render their transport safe.

⁽⁹⁾ Recitals 42 to 57 of Commission Implementing Regulation (EU) 2024/2163 of 14 August 2024 imposing a provisional anti-dumping duty on imports of biodiesel originating in the People's Republic of China (OJ L, 2024/2163, 16.8.2024, ELI: http://data.europa.eu/eli/reg_impl/2024/2163/oj).

- (34) Therefore, the complainants invited the Commission to make sure that imports of filled HPSC were subject to surveillance measures and be identified separately from other HPSC imported under CN code 8424 10 00.
- (35) In this respect, the Commission noted that to distinguish between empty and filled fire extinguishers, two dedicated TARIC codes (8424 10 00 11 and 8424 10 00 21) were created. This ensures that empty fire extinguishers are separately identified, monitored, and subject to the applicable anti-dumping duties, preventing any risk of circumvention through misdeclaration.
- (36) Moreover, under Union customs classification rules, and in particular General Interpretative Rule 5(b) (GIR 5(b)), packing materials or containers presented with goods are classified with the goods only if they are of a kind normally used for packing and not suitable for repetitive use. However, where a cylinder which can be refilled many times, already contains gas, the cylinder and its contents are classified separately: the cylinder falls under CN code 7311 00, while the gas is classified under its respective CN code.
- (37) As a result, any attempt to import filled cylinders to circumvent measures on empty cylinders would not succeed, because the importation of filled cylinders is legally and administratively distinct from the empty cylinders subject to the anti-dumping duties. The measures, together with the applicable TARIC codes (8424 10 00 11 and 8424 10 00 21), ensure that empty cylinders are properly identified and monitored.
- (38) Following final disclosure, the complainants, sought a re-wording of recitals 36 and 37, considering that it was too vague to ensure the uniform application of duties across Member States. In particular they requested an explicit reference to the fact that the duties apply to all HPSC, including those imported filled.
- (39) The Commission recalled that the product concerned by the investigation and the resulting measures is limited to empty HPSC, as defined in the product scope. Filled HPSC do not fall within this scope, as they are downstream products that were not subject to the investigation. The wording of recitals 36 and 37 therefore appropriately reflected the scope of the product under investigation and the duties should apply only to empty HPSC. The claim was therefore rejected.
- (40) With regard to the suggestion made by the complainants to add the sentence at the end recital 36 above: 'the same principles apply to cylinders imported under other customs codes, including under heading 8424 10', the Commission clarified that, in the case of fire extinguishers made with HPSC, the classification is determined by the essential function and characteristics of the fire extinguisher as a whole (General Interpretative Rule 1 (GIR 1)). Fire extinguishers are classified in heading 8424 whether filled or not and the whole appliance (containing cylinder as its component) cannot be considered a packaging or container. Accordingly, General Interpretative Rule 5 (GIR 5) does not apply. The suggested amendment was therefore not considered justified as the fire extinguisher made of a cylinder and its content are in this case classified together under a single CN code.
- (41) The Commission noted that as indicated above in recital 35, to distinguish between empty and filled fire extinguishers, dedicated TARIC codes (8424 10 00 11 and 8424 10 00 21) had been created to ensure that empty fire extinguishers are separately identified and subject to the applicable anti-dumping duties. In addition, TARIC code 8424 90 80 60 was introduced to cover empty high-pressure steel cylinders used in fire extinguishers when declared as parts.

2.4.3. *Claim to exclude 'empty fire extinguishers'*

- (42) Zhejiang Winner claimed that the empty fire extinguishers covered by TARIC codes 8424 10 00 11 and 8424 10 00 21 and empty fillable or refillable high-pressure seamless steel cylinders covered by the CN codes 7311 00 11, 7311 00 13, 7311 00 19, and 7311 00 30 were distinct products belonging to separate sectors, with different uses, having their separate markets, having different physical characteristics and functions in different industries, which thus required a separate injury assessment.

- (43) Ruiying, claimed that empty fire extinguishers should be excluded from the scope of the Commission's investigation. Should empty fire extinguishers be part of the scope, Ruiying argued that a separate assessment and injury calculation should be carried out to reflect the distinction between the empty seamless cylinders and empty fire extinguishers.
- (44) Ruiying reiterated that fire extinguishers:
- are subject to specific technical standards and EU Directives (among other things, being subject to specific marking and colouring requirements);
 - are certified as being compliant with these standards and Directives at the manufacturing stage, making it economically inefficient to subsequently repurpose them for other uses;
 - have distinct uses compared to other HPSC; and
 - have a fundamentally different market compared to other HPSC, reflected in the differences in distribution channels.
- (45) In its reply to the submission made after provisional disclosure, the complainants disagreed with the claim that HPSC and empty fire extinguishers were two fundamentally distinct types of products and disagreed that a separate injury assessment should be conducted for each sector individually, arguing instead that both fall within the same product scope and share comparable physical, technical, and/or chemical characteristics, warranting a single, integrated injury analysis.
- (46) The Commission concluded in recital 28 of the provisional Regulation that the scope of this investigation was subject to the definition of the product under investigation as contained in Section 2 of the Notice of Initiation. Consequently, empty fire extinguishers that shared the same physical and chemical characteristics as high-pressure seamless cylinders were considered to fall within the scope of the product under investigation.
- (47) Finally, Ruiying argued that the inclusion of empty fire extinguishers within the product scope was not in the Union interest, as the Union was reliant on Chinese imports and had insufficient capacity to adapt to reduced supply from China. In recital 31 of the provisional Regulation however, it was already mentioned that the complainants submitted that filled or charged fire extinguishers were most likely composed predominantly of welded cylinders or of other non-steel cylinders and fell therefore outside the scope of the investigation.
- (48) The claims regarding the need for a separate injury assessment and existing production capacities of empty fire extinguishers in the Union are further addressed in Sections 4 and 7 below.

2.4.4. *Risks of circumvention*

- (49) Ruiying claimed that HPSC imported as empty fire extinguishers are not easily substitutable with HPSC destined for other uses and therefore, there was no risk of circumvention if they were to be excluded from the product scope. EUROFEU and BVFA claimed that converting HPSC destined to the firefighting industry to be used for another gas for instance, would be technically complex, as well as very costly and would necessitate a complete reassessment by a Notified Body. Any change of use would require the HPSC to be stripped and repainted in another colour, which is a costly process. It should be noted that HPSC imported in the Union are transported by sea and those to be used as portable fire extinguishers inside the Union are normally painted before shipment in RAL 3000 ('fire red') to distinguish them from other HPSC. If unpainted or otherwise protected prior to shipment, HPSC would arrive corroded in the Union.

- (50) Therefore, EUROFEU and BVFA argued that in line with ISO 137697 ⁽⁶⁾, importers could instruct manufacturers to add a mark indicating that the cylinder is intended exclusively for firefighting purposes by adding the mark 'FOR FIREFIGHTING USE ONLY'. Accordingly, the antidumping duties would only apply to 'generic' cylinders imported without this specified application. The change of the existing TARIC Codes by including this mark: 'FOR FIREFIGHTING USE ONLY' could therefore provide an effective means to prevent circumvention through substantial transformation within the Union.
- (51) The complainants argued that unfilled HPSC fire extinguishers clearly fall within the scope of the investigation, and that distinguishing them from HPSC based on use or customs code was unwarranted. They claimed that repainting HPSC was a routine and cost-effective process when performed in dedicated facilities. Furthermore, simple alterations, like replacing a 'lever valve' used in portable HPSC fire extinguishers with a standard HPSC valve was straightforward, and there was nothing to prevent the removed valves from being sent back to the countries concerned for reuse in a circular system to circumvent the measures.
- (52) As mentioned in recital 46 above, the Commission considered that empty fire extinguishers and high-pressure seamless cylinders shared the same physical and chemical basic characteristics and the specific marking and colouring requirements, as well other certification requirements, could be conveniently modified after the import according to their final destination use.
- (53) After final disclosure, ANIMA, a user, and Eurofeu, a user association of HPSC for fire extinguishers, requested the inclusion of filled HPSC used in fire extinguishers in the definitive anti-dumping measures, arguing that the exclusion would increase imports of filled products and undermine the effectiveness of the measure. They stated that applying the duty only to empty cylinders would place Union fire extinguisher assemblers at a disadvantage, as they would face higher input costs while competing against duty-free filled products, thereby creating perverse incentives to relocate value-added assembly outside the Union and weakening the Union industrial base. ANIMA and Eurofeu further argued that excluding filled products would create a clear risk of circumvention, since Chinese exporters could ship filled cylinders duty-free and subsequently empty them or sell them within the Union. They also raised safety concerns, noting that imported filled products may use non-EU valves of lower quality. They concluded that including both empty and filled HPSC and fire extinguishers in the measure was necessary to ensure effective protection of the Union market and maintain fair competition for Union users.
- (54) The Commission considered the concerns raised regarding potential circumvention of measures through the importation of filled fire extinguishers using HPSC. The Commission noted however, that the scope of this investigation was limited to empty HPSC as clarified in the Note to the file of 6 March 2025 ⁽⁷⁾ and that filled HPSC or filled fire extinguishers are downstream or further processed products that are not subject to the investigation, and no findings of dumping or injury exist for these products. Hence, the Commission cannot consider any extension of the measures beyond the product scope as suggested by ANIMA and Eurofeu. The Commission also noted that, should sufficient evidence emerge of circumvention of the measures imposed by this Regulation within the meaning of Article 13 of the basic Regulation, that provision could be used to address such circumvention.
- (55) The Commission also noted that because of the distinction in the TARIC between empty and full fire extinguisher it will be possible to identify changes in the quantities and price of empty and full fire extinguishers.

2.5. Conclusion

- (56) In the absence of any other comments with respect to the product scope, the Commission confirmed the conclusions set out in recitals 27 and 42 of the provisional Regulation.

⁽⁶⁾ Clause 4.3 (Arrangement of stamp marking), Table 1 (Stamp markings), position 23, optional stamp markings are permitted.

⁽⁷⁾ t25.003143.

3. DUMPING

- (57) Following provisional disclosure, the Commission received comments from Tianjin Tianhai, Zhejiang Winner and the complainants on the provisional dumping findings.

3.1. Existence of significant distortions

- (58) The details of the existence of significant distortions were set out in Section 3.3 of the provisional Regulation. In the absence of comments on the existence of significant distortions within the meaning of Article 2(6)(a) and (b) of the basic Regulation in the steel sector in the People's Republic of China, the Commission confirms its findings in this respect as elaborated in section 3.3 of the provisional Regulation.

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

- (59) In recital 149 of the provisional Regulation, the Commission stated that, in order to construct the normal value in accordance with Article 2(6)(a) of the basic Regulation, it would use Global Trade Atlas ('GTA') to establish the undistorted cost of most of the factors of production, notably the raw materials. In addition, the Commission stated that it would use the Turkish Statistical Institute ⁽⁸⁾ for establishing undistorted costs of labour and the electricity tariff tables based on electricity bills published by the Energy Market Regulatory Authority (EMRA) ⁽⁹⁾ as well as the price of gas for industrial users in Türkiye as published by the Turkish Statistical Institute ⁽¹⁰⁾.
- (60) Zhejiang Winner once more contested the choice of Türkiye as a representative country after provisional disclosure. Their claims are addressed in Section 3.3.1.

3.3. Normal value

3.3.1. Representative country

- (61) Following provisional disclosure, Zhejiang Winner reiterated its comments already mentioned in recital 123 of the provisional Regulation, that Türkiye having imposed anti-dumping duties on imports of certain seamless steel pipes (including product under HS codes 7304 39 and 7304 59) since 2016 and renewed them for an additional five years in 2022, these measures were having a distorting effect on market prices. Zhejiang Winner claimed that consequently Turkish domestic and import price levels were therefore considered as unreliable in order to establish a normal value and argued again in favour of using Colombia as a representative country.
- (62) With regard to Colombia, which was proposed by Zhejiang Winner as a possible representative country, the Commission noted that, similarly to the People's Republic of China, this country falls under the category of 'upper middle income' countries according to the classification of World Bank.
- (63) However, the company identified by Zhejiang Winner, Ternium S.A. ⁽¹¹⁾, a listed company manufacturing steel products in Colombia was not suitable insofar as there was no evidence available demonstrating that the output of this company was close to the product under investigation. Furthermore, the Commission noted that this company operated in a related but different sector (NACE 24) from the product under investigation. Finally, Zhejiang Winner provided financial statements covering the whole Ternium group and not specifically Ternium Colombia S.A.S.
- (64) On this basis, the Commission considered that Zhejiang Winner had not demonstrated that Colombia was a more appropriate representative country than Türkiye.
- (65) The Commission therefore confirmed the conclusions included in the Second Note that Colombia could not be considered as an appropriate representative country.

⁽⁸⁾ <https://data.tuik.gov.tr/Bulten/Index?p=Structure-of-Earnings-Statistics-2022-49750&dil=2>.

⁽⁹⁾ <https://www.epdk.gov.tr/Detay/Icerik/3-0-39/kurul-kararlari> (→ Press releases → select Electricity electricity market board decisions).

⁽¹⁰⁾ <http://www.turkstat.gov.tr> (→ Press releases → select Natural Gas prices).

⁽¹¹⁾ <https://www.ternium.com/es/hecho-con-acero>.

3.3.2. Determination of the cost of labour

- (66) Following the imposition of provisional measures, the complainants argued that the Commission did not explain how it had defined the cost of labour and which adjustments were made to reflect the reality of the cost of labour based on Turkish statistics.
- (67) Given the difference in the cost of labour presented by the complainants in their comments to the Second note on Factors of Production and the figures used by the Commission in the provisional Regulation, the complainants requested the Commission to revise the calculation accordingly. In this regard, the Commission should consider the latest available information regarding actual weekly working hours and monthly average labour cost by economic activity and not the 2022 'Monthly average paid hours, gross wages and earnings by economic activity' as outlined in the Second Note⁽¹²⁾. The Complainants also noted that the employers' costs for social security and unemployment fund contributions were underestimated in Türkiye, as the total employers' insurance liability out of total labour costs stood at 22,75 % only.
- (68) As indicated in recital 133 of the provisional Regulation, the values of the benchmark for labour cost were based on the hourly average labour costs for 2022 for the economic activity 'Manufacture of basic metals' NACE code 24 according to NACE Rev.2 classification further adjusted for inflation using the domestic consumer price index⁽¹³⁾ to reflect the costs for the investigation period. Therefore, there were no further adjustments made to the cost of labour.
- (69) The Commission confirmed its intention to use the adjusted statistics published by the Turkish Statistical Institute⁽¹⁴⁾ for the Sector 'Manufacture of basic metals', as mentioned in recital 67, as it provided a reliable statistical source for this factor instead of Eurostat figures, which were deemed by the Union industry to be more reliable than statistics published by the Turkish Statistical Institute. Nonetheless, the complainants did not bring forward any valid reason after the provisional Regulation that could change this approach.
- (70) Furthermore, the complainants argued that their comments regarding the methodology for calculating the manufacturing overheads in the construction of the normal value had not been taken into account by the Commission. The complainants argued that the Commission would be in breach of Article 2(6)(a) of the basic Regulation by using the exporting producers' own percentage of overheads based on cost items affected by significant distortions. The complainants requested the Commission to reexamine this point by using alternative calculation methods which could lead to a more accurate representation of actual overhead costs.
- (71) The methodology to determine the manufacturing overheads was explained in recital 132 of the provisional Regulation. Since manufacturing overheads were not separately identified in the available profit and loss account figures and were deemed to be included in the cost of goods sold, the value for manufacturing overheads was based on the sampled exporting producer's specific data and applied on the 're-calculated' undistorted cost of manufacturing, as per standard practice in such cases. The complainants did not provide any alternative approach which could be used instead.

3.3.3. Benchmark used for alloy and non-alloy steel tubes

- (72) Tianjin Tianhai claimed that the use of the Global Trade Atlas ('GTA') led to an unreasonable outcome for certain factors of production ('FOPs'). This exporting producer Tianjin Tianhai argued that the Commission should adjust the benchmark for the two types of seamless steel tubes for manufacturing high-pressure seamless steel cylinders to take into account the different chemical composition and resulting relative prices. It claimed in this regard that the unit price found in 'GTA' and used by the Commission for the two types of seamless alloy and non-alloy steel tubes, the latter being almost two times less expensive than the former could not reflect both the 'intrinsic properties of the alloy/non-alloy steel and commercial pricing principles within the steel industry. Such irrationality has led to a severe overestimation of Tianhai's normal value, consequently leading to unnecessary distortion of determination of the dumping margin'.

⁽¹²⁾ AD724_HPSC_2nd Note on sources for the determination of the normal value (t25.003184).

⁽¹³⁾ TurkStat, Labour cost indices, 2009-2024 [2021 = 100] / (<https://data.tuik.gov.tr/Bulten/Index?p=Labour-Input-Indices-Quarter-I-January-March,-2024-53682&dil=2>).

⁽¹⁴⁾ <https://data.tuik.gov.tr/Bulten/Index?p=Structure-of-Earnings-Statistics-2022-49750&dil=2>.

- (73) Tianjin Tianhai noted that the two tariff codes selected by the Commission for determining the non-alloy steel benchmark price (HS codes 7304 39 82 90 and 7304 39 83 90), although differentiating by outer diameter, covered a very broad range of products and included high-priced non-cylinder tube products such as high-pressure boiler tubes used for boiler rooms in large buildings. It also noted that the benchmark for non-alloy steel tube (7304 39) was higher than that for alloy steel tube (7304 59) which was illogical.
- (74) Consequently, Tianjin Tianhai considered that the benchmark prices adopted by the Commission from the two non-alloy steel HS codes were distorted by high-priced products contained and proposed two methods to correct what it considered to be a wrongly inflated average import price under these HS codes.
- (75) Tianjin Tianhai first proposed to adjust the benchmark price for non-alloy steel based on the currently determined benchmark price for alloy steel, utilizing the ratio derived from the weighted average prices under the respective 6-digit HS codes (7304 59 for alloy, 7304 39 for non-alloy).
- (76) Alternatively, it proposed to adjust the benchmark price for non-alloy tube based on the currently determined benchmark price for alloy tube, applying the ratio between the non-alloy tube production cost and the alloy tube production cost as reported in Tianjin Tianhai's actual production cost data as verified by the Commission.
- (77) The Commission concurred with Tianjin Tianhai that, considering the objective difference of price between the two types of seamless alloy and non-alloy steel, it would not be logic to use a benchmark price for non-alloy steel tube that would be higher than for alloy steel tube.
- (78) The Commission accepted the claim and recalculated the normal value for the company using the ratio at the 6-digit level approach as proposed by Tianhai Tianjin in recital 75, which resulted in its decrease.
- (79) As demonstrated in Section 3.3 of the provisional Regulation, Chinese production costs are distorted. Hence, the Commission did not consider that using a method based on Tianjin Tianhai costs was appropriate. The Commission therefore considered that Tianjin Tianhai's method of using the ratio derived from the weighted average prices under the respective 6-digit HS codes (7304 59 for alloy, 7304 39 for non-alloy) at the 6-digit level approach to adjust the benchmark for non-alloy steel tubes as presented in Table 1 of the provisional Regulation was appropriate.
- (80) The Commission therefore revised the benchmark for non-alloy steel tube (HS code 7304 39) to 5 850 CNY/tonne.
- (81) Following final disclosure, the complainants first claimed that the adjustment to the provisional benchmark for non-alloy steel tube was not justified arguing that the provisional benchmark for alloy steel could have already been undervalued due to product mix issues and urged the Commission to revert to the original benchmark value.
- (82) The complainants also argued that, if adjustments were to be performed, the Commission should use the 'adequate' customs codes for alloy steel tube and that code 7304 59 30 was not appropriate. In this regard, it referred to the complaint and certain industry standards for the production of HPSCs relating to the chemical composition of the steel tubes used for the manufacturing of HPSC. Besides, the complainants argued that the Commission should rely on more specific customs code to calculate the corresponding benchmarks for alloy and non-alloy steel tubes depending on their respective diameters.
- (83) Should the Commission not rely on these specific customs code and perform an adjustment to the provisional benchmark for non-alloy steel, the complainants also argued that the Commission should base such adjustment on international benchmark prices for seamless pipes and tubes over the IP (Preston Pipes) and proposed various alternatives in this regard.

- (84) In the same respect, Zhejiang Winner also claimed that the adjustment methodology was unreasonable and referred to the respective different share of alloy / non alloy steel tubes used for the production of HPSC contained in the HS codes import volume used to calculate the contested adjustment. In this respect it claimed that the Commission should revert to the benchmark established at provisional stage.
- (85) In this regard, the Commission noted that interested parties were already given two opportunities to comment on the benchmarks used to calculate normal value: once following the publication of the Second Note on 7 March 2025 and once following the imposition of provisional measures on 5 August 2025. These interested parties did not use these opportunities to submit comments on the very same proposed or used benchmarks. No comments were received either after BTIC submitted its comments on the provisional measures.
- (86) On the substance, the Commission considered that the adjustments proposed by the complainants could not be accepted as they were based on an international benchmarks that were disconnected from the selected representative country and therefore from the source of the relevant FOP that was to be adjusted.
- (87) As for the claim by Zhejiang Winner, the Commission did not consider that the share of tubes, whether made of alloy or non-alloy steel, actually should be a determining factor as the purpose of the adjustment was to establish a ratio between alloy and non-alloy steel tubes to reflect market reality and price differences normally observed between the two steel tube types. More specifically, the Commission relied on a larger volume of imports in the two HS codes and compared the corresponding unit price to calculate the basis for the adjustment between the two steel tube types. As Zhejiang Winner did not propose any alternative method to adjust the benchmark of alloy steel tubes, which was overstated, the Commission decided to maintain the methodology suggested by BTIC and to reject Zhejiang Winner's claim.
- (88) Zhejiang Winner also argued that the downward adjustment for the non-alloy steel benchmark was unwarranted as it was based on the wrong presumption that the benchmark for alloy steel tube should be higher than for non-alloy steel tube. In this regard, it argued that other elements such as yield strength and tensile strength also have a significant impact on market prices.
- (89) Zhejiang Winner also claimed that the underlying reason suggested by BTIC for performing an adjustment and reference to a Turkish seamless tube anti-dumping investigation ⁽¹⁵⁾ covering an investigation period from 2018 to 2020 was not appropriate as the investigation period of this proceeding did not overlap. Besides, the Zhejiang Winner claimed that the Commission did not rely on positive evidence and objective examination to perform such adjustment.
- (90) The Commission disagreed with Zhejiang Winner and referred to international benchmark prices such as Preston Pipes which confirm the existence of a price differential between non-alloy and alloy steel tube. The Commission also noted that, although prices in the PRC market are distorted, the information submitted by the sampled exporting producers and verified by the Commission also revealed the existence of such price differential between alloy and non-alloy steel tube, justifying the adjustment performed by the Commission. On this basis, the Commission considered that it relied on positive evidence and performed an objective assessment of the facts. As for the reference to the Turkish investigation, the Commission did not rely primarily on such element to accept BTIC's claim but rather on market knowledge and the price differential observed between the benchmarks calculated for alloy and non-alloy steel tubes. Consequently, these comments were rejected.
- (91) Zhejiang Winner also noted that alloy steel tubes are indispensable and used in most types of cylinders due to the high pressure that the HPSC must withstand. Zhejiang Winner also explained that there are various views concerning the classification of manganese steel and that it should be classified as alloy steel if the manganese content is more than 1,65 %. In the absence of more specific claims, the Commission took note of the submission and took no further action.

⁽¹⁵⁾ See İTHALATTA HAKSIZ REKABETİN ÖNLENMESİNE İLİŞKİN TEBLİĞ (TEBLİĞ No 2022/19).

3.4. Calculation

3.4.1. Normal Value

- (92) On the basis of the above, the Commission constructed the normal value per product type on the ex-works level of trade in accordance with Article 2(6)(a) of the basic Regulation, as described in recitals 165 to 170 of the provisional Regulation.

3.4.2. Export price

- (93) The sampled exporting producers exported to the Union either directly to independent customers or through domestic related companies acting as traders.
- (94) In both cases, the export price was the price actually paid or payable for the product concerned when sold for export to the Union, in accordance with Article 2(8) of the basic Regulation.

3.5. Comparison

- (95) At provisional stage, the Commission made adjustments for commissions under Article 2(10)(i) of the basic Regulation for the related trader of Zhejiang Winner and Tianjin Tianhai by deducting the SG&A costs of the related traders and a notional profit of 5 %.
- (96) Tianjin Tianhai disagreed with the adjustment made by the Commission under Article 2(10)(i) of the basic Regulation for the related trader by deducting the SG&A costs of the related traders and a notional profit of 5 % ⁽¹⁶⁾ warranted by a contract between the exporting producer and its related trader, Beijing Tianhai Industry Co., Ltd., showing the existence of arbitration clause in case of conflict between the two. Tianjin Tianhai considered that the Commission should evaluate the functions and role of the related trader more broadly by considering all the relevant factors and not limit its analysis to one single point in the contract.
- (97) In this regard, Tianjin Tianhai raised the following points:
- The related trader only purchased the product concerned from producers within the group.
 - Despite the fact that there is a contractual relationship between the producer and the related trader, the Commission should nonetheless examine the functions and the role to be fulfilled by the related trader in the framework of their daily business operations and structure setup and more specifically whether:
 - (a) there is a competing relationship between the two entities;
 - (b) the related trader never purchased and sold the products produced by other producers;
 - (c) the legal entity enjoyed discretion and freedom to develop business on its own initiative without paying attention to the shared common interest and commercial strategies;
 - (d) the producer and the related trader had competing relationship or pursue their own designed business goals.

⁽¹⁶⁾ Recital 177 of the provisional Regulation: 'The 5 % notional profit, was in line with the profit deducted in other recent steel cases concerning products integrating steel inputs in the absence of cooperation of unrelated importers' such as Commission Implementing Regulation (EU) 2024/1915 of 11 July 2024 imposing a provisional anti-dumping duty on imports of mobile access equipment originating in the People's Republic of China (OJ L, 2024/1915, 12.7.2024, ELI: http://data.europa.eu/eli/reg_impl/2024/1915/oj) (see recital 252).

- (98) Finally, Tianjin Tianhai used as an analogy, a previous case⁽¹⁷⁾, whereby, the Commission established that two independent legal entities can be considered as ‘a group’, despite their independent legal entities and competing commercial activities. By analogy, it claimed that the mere existence of a contractual relationship and/or of an arbitration clause should not automatically lead to a conclusion they are not entities within the same economic group. Furthermore, in this case, Tianjin Tianhai claimed that since both the producer and the related trader were operating in a concerted manner, sharing a common business objective and commercial targets, there could be no conflict of interest within the Group.
- (99) Finally, Tianjin Tianhai referred to a ruling of the Court of Justice⁽¹⁸⁾ of 25 June 2015, in which, an applicant⁽¹⁹⁾ put forward, *inter alia*, a plea in law composed of two parts:
- First, it submitted that the existence of a single economic entity between the applicant and a subsidiary of a *related trading company* through which it was selling the product concerned in the Union should have been recognised. According to the applicant, its existence precluded the application of Article 2(10)(i) of the basic Regulation.
 - Secondly, it submitted that no evidence had been provided that the *related trading company* carried out functions similar to those of an agent working on a commission basis.
- (100) The Court found that in paragraph 51 that ‘in order to determine whether a company carries out the functions of an internal export sales department within a group, the institutions should examine the overall functions carried out by that company in the marketing and export of the product concerned as well as of other products, both within the group and in its relations with independent third party producers’. Consequently, Tianjin Tianhai considered that the mere existence of an ‘arbitration clause’ would not be consistent with the aforementioned ruling of the Court and invited the Commission to revise its provisional conclusions.
- (101) However, in paragraph 61 of the same ruling, the Court considered that the existence of a written contract constituted a relevant factor for the purposes of determining whether two entities were forming a single economic entity. In the case at hand, the existence of such a sales contract between Tianjin Tianhai and Beijing Tianhai, which included an arbitration clause as mentioned in recital 177 of the provisional Regulation would constitute further evidence demonstrating that the relationship between the applicant and its related company was organised on the basis of normal commercial conditions.
- (102) This assessment was further substantiated by the presence in the same sales contracts between Tianjin Tianhai and Beijing Tianhai which were collected during the on-spot verification visit of various clauses such as penalties to be paid in case of delayed delivery, refusal of the delivery for quality reasons, conditions of transfer of ownership of the goods and detailed payment conditions between Tianjin Tianhai and Beijing Tianhai. Other elements such as the fact that the related trader only partially owned the producer and the absence of any sales exclusivity clause whereby Beijing Tianhai was free to source the product under investigation from any supplier, were further elements allowing to concluded that both companies were not forming a single economic entity.
- (103) The investigation revealed that Beijing Tianhai was directly negotiating the sales prices with the final Union unrelated customers. Furthermore, following the sales, any amount paid by the final customer which exceeded the initial sales price agreed between Tianjin Tianhai and Beijing Tianhai could be kept by Beijing Tianhai or if not, Tianjin Tianhai would receive the difference with the initial agreed price. In addition, both Tianjin Tianhai and Beijing Tianhai were involved in domestic sales of the product under investigation. The claim that the Commission should not deduct an amount for constructed commission under Article 2(10)(i) of the basic Regulation was therefore rejected.

⁽¹⁷⁾ Commission Implementing Regulation (EU) 2025/1151 of 11 June 2025 imposing a definitive anti-dumping duty on imports of vanillin originating in the People's Republic of China (OJ L, 2025/1151, 12.6.2025, ELI: http://data.europa.eu/eli/reg_impl/2025/1151/oj).

⁽¹⁸⁾ Case T-26/12, *PT Musim Mas v Council*, ECLI:EU:T:2015:437.

⁽¹⁹⁾ PT Perindustrian dan Perdagangan Musim Semi Mas is a company established in Medan (Indonesia).

- (104) The method described in recital 173 to 177 of the provisional Regulation regarding the adjustments made under Article 2(10)(i) of the basic Regulation for the related trader of Zhejiang Winner and Tianjin Tianhai by deducting a constructed commission based on the SG&A costs of the related traders and a notional profit of 5 % remain valid.

3.6. Dumping margins

- (105) As described in recitals 72 to 91, following a claim from Tianjin Tianhai, the Commission revised the benchmark used for non-alloy steel tube whereby the normal value of products containing such factor of production was adjusted downward.
- (106) Following those changes in the level of the dumping margin for the two sampled companies, the Commission recalculated the dumping margin applicable to other cooperating companies based on the duty applicable to the two sampled companies. For all other companies, the Commission based its calculation on a representative volume of export sales to the Union, of one exporting producer, relating to two models with the highest dumping margins accounting for over 5 % of the exported volume of this exporting producer.
- (107) 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 (%)
Tianjin Tianhai High Pressure Container Corp., Ltd	57,7
Jiangsu Tianhai Special Equipment Co., Ltd	
Kuancheng Tianhai Pressure Container Co., Ltd.	
Zhejiang Winner Fire Fighting Equipment Co., Ltd.	59,7
Other cooperating companies listed in the Annex	58,9
All other companies	90,3

4. INJURY

4.1. Definition of the Union industry and Union production

- (108) Following provisional disclosure, Zhejiang Winner questioned the representativeness of the Union industry, arguing that the absence of key fire-extinguisher producers means that the industry, composed solely of HPSC producers, was not representative of the whole sector. According to Zhejiang Winner, since empty fire extinguishers are considered a like product, their producers should be included under Article 4(1) of the basic Regulation. Zhejiang Winner contended that this omission undermines the representativeness of the Union industry and submits that the Commission should either exclude empty fire extinguishers from the product scope or include their producers at the definitive stage to ensure a complete and accurate injury assessment.
- (109) The Commission did not share the view that the Union industry lacks representativeness due to the absence of producers of fire extinguishers. Only empty fire extinguishers falling within the scope of the product definition are considered part of the product scope. Complete, filled fire extinguishers are not covered by the current product scope. Accordingly, only producers of high-pressure seamless cylinders, including those intended for use in fire extinguishers, are relevant for the definition of the Union industry.

- (110) HPSC are an essential input for the fire extinguisher industry. However, the fire extinguisher industry itself does not manufacture HPSC and acts only as a downstream user, producing filled fire extinguishers from pre-manufactured HPSC. HPSC are manufactured, tested, and certified as standalone high-pressure cylinders for multiple applications, including but not limited to fire extinguishers. The fire extinguisher industry purchases these cylinders, fills them with extinguishing agent, assembles the final product, and sells them to the market. Treating HPSC and fire extinguishers as separate products for the injury assessment is equivalent to ignoring the integrated supply chain and the relationship between these distinct economic operators. Hence, the Commission considered that the composition of the Union industry, consisting of HPSC producers, remained appropriate for assessing injury for the sector concerned.
- (111) The sampled producers of HPSC accounted for more than 40 % of the estimated total production and sales of the like product in the Union, demonstrating that the sample was sufficiently representative of the Union industry.
- (112) The Commission therefore rejected Zhejiang Winner's claim, as HPSC for fire extinguishers and HPSC for other uses are, in fact, a single like product; therefore, no distinction is needed for the purposes of assessing the representativeness of the Union industry.
- (113) In the absence of any other comments with respect to the Union Industry, the Commission confirmed the conclusions set out in recitals 187 and 188 of the provisional Regulation

4.2. Union consumption

- (114) Zhejiang Winner also stated that the injury analysis was flawed because it focused solely on HPSC and omitted empty fire extinguishers, despite their explicit inclusion as like product. Zhejiang Winner noted that, under Article 3(2) of the basic Regulation, injury must be assessed on the basis of an objective examination of all relevant evidence, including both the effects of dumped imports on prices and their impact on the Union industry.
- (115) Zhejiang Winner further stated that no data were provided on empty fire extinguishers regarding consumption, production, sales, market share or imports during the period considered. Zhejiang Winner emphasized that this omission rendered the injury assessment incomplete and inaccurate.
- (116) The Commission recalled, as explained in recital 196 of the provisional Regulation, that empty fire extinguishers were not ignored but that the statistical assessment could only be performed at the definitive stage because at that stage import data were available for only three months outside the investigation period and were expressed in kilograms rather than in pieces, making the provisional data too limited and unrepresentative for a meaningful assessment.
- (117) The Commission did not consider that a segmented analysis for empty fire extinguishers was warranted. Hence the Commission relied on the production and sales data, that included all types of HPSC including empty fire extinguishers which were provided by the Union industry and duly verified by the Commission, to assess the impact of Chinese dumped imports on the overall economic situation of the Union industry as far as the product under investigation is concerned.
- (118) As statistics on empty fire extinguishers concerning TARIC 8424 10 00 11 and 8424 10 00 21 became available after the provisional stage, they were fully incorporated into the definitive evaluation, also as indicated in recital 21 above, an estimation of the potential volume of HPSC imports falling under CN codes 8424 90 80 and 8479 90 70 was included (see recital 125 below for the methodology used).

- (119) After including statistics on HPSC used for empty fire extinguishers, Union consumption developed as follows:

Table 1

Union consumption (unit/pieces)

	2021	2022	2023	Investigation period
Total Union consumption	6 318 530	7 417 559	6 394 357	7 220 019
<i>Index</i>	100	117	101	114

Source: Macro-questionnaire, Union Producer data, Eurostat.

- (120) After the update of consumption data, the assessment of consumption remained unchanged from the provisional determination. Following strong growth in 2022 and a subsequent drop caused by stockpiling due to elements such as risk of supply shortages in the context of COVID-19 or unexpected consumer behaviour, Union consumption increased by 14 % over the period considered.
- (121) Empty fire extinguishers accounted for slightly less than 2 % of total Chinese imports under the relevant TARIC codes during the investigation period. Consequently, the limited treatment of statistics for empty fire extinguishers at the provisional stage did not distort the overall injury assessment, as the substantial majority of imports and their impact on the Union industry had already been captured.
- (122) On the basis of the above, these claims were rejected and the overall conclusions drawn at provisional stage were confirmed.

4.3. Imports from the country concerned

4.3.1. Imports in volume from the country concerned

- (123) Regarding import data, Zhejiang Winner indicated that the absence of statistical information under TARIC codes 8424 10 00 11 and 8424 10 00 21 was due to the fact that these codes were introduced only in March 2025. Historical data under previous codes (8424 10 00 10 and 8424 10 00 90) showed that imports of empty fire extinguishers from China represented 21 % of total Union imports during the investigation period, contrary to the provisional finding of 2 %.
- (124) The Commission acknowledged that TARIC codes for HPSC used in empty fire extinguishers were introduced only after registration in March 2025, i.e., after the investigation period. However, the historical CN codes cited by Zhejiang Winner (8424 10 00 10 and 8424 10 00 90) were generic codes for fire extinguishers, whether or not charged, and did not distinguish empty fire extinguishers covered by the product definition from other types of fire extinguishers not covered by the product definition such as filled fire extinguishers. As a result, the figures derived from these historical codes would highly overstate the imports of the product concerned and could therefore not be relied upon for the purposes of assessing imports of the product concerned during the investigation period.
- (125) In the absence of precise import data in pieces (available only in weight) for the investigation period, the Commission estimated imports of the product concerned as follows. First, the share of the specific empty fire extinguishers under investigation (TARIC codes 8424 10 00 11 and 8424 10 00 12) was calculated within the total volume of the broader CN code 8424 10 00, which functioned as an ex-code, for the period March to August 2025. This proportion was then applied to the total imports recorded under the ex-code during the investigation period to estimate the total volume of the product concerned. The same proportion was applied to CN codes 8424 90 80 and 8479 90 70, under which cylinders are imported as components and which function as basket codes. The resulting total weight was converted into units using the average weight per piece of the product most frequently sold by the

sampled exporting producers. The methodology was applied to all importing countries and to imports in value, with the corresponding average price per piece calculated accordingly. These volumes were subsequently added to those already identified at the provisional stage. This approach allowed the Commission to derive a consistent and reliable estimate of import quantities, providing a sound basis for assessing the impact of the imports on the Union industry.

- (126) Based on the methodology described above, the Commission estimated the quantity of imports of the product concerned from the People's Republic of China during the investigation period as follows:

Table 2

Import quantity and market share

	2021	2022	2023	Investigation period
Quantity of imports from the PRC (unit/pieces)	3 822 064	4 801 030	4 191 986	5 038 241
<i>Index</i>	<i>100</i>	<i>126</i>	<i>110</i>	<i>132</i>
Market share (%)	60	65	66	70

Source: Eurostat.

- (127) Following the inclusion of the new data on HPSC used in empty fire extinguishers and HPSC imported as parts, the definitive assessment of the evolution of imports from the PRC remained consistent with the provisional assessment. Imports from the PRC showed a strong upward trend both in absolute quantities and market share, with China holding a dominant position of 70 % of the Union market in the investigation period.
- (128) No other comments were received concerning imports from the country concerned. Therefore, the conclusions from recitals 192 to 200 of provisional Regulation were confirmed.

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

- (129) In accordance with the methodology applied to the estimated import volumes (see recital 125), the Commission recalculated the weighted average import price of the products originating in the country concerned. The development of this revised average import price over the period considered is presented below:

Table 3

Import prices (EUR/ piece)

	2021	2022	2023	Investigation period
China	16,08	15,78	14,83	12,02
<i>Index</i>	<i>100</i>	<i>98</i>	<i>92</i>	<i>75</i>

Source: Eurostat.

- (130) The average import price of products originating in the PRC was found to be higher than that established in the provisional findings. Nevertheless, the overall price trend remained consistent with the provisional assessment. Accordingly, the conclusions set out in recitals 201 to 207 of the provisional Regulation were confirmed.

- (131) Further to final disclosure, Zhejiang Winner argued that the Commission's injury analysis was flawed. It claimed that the methodology used to estimate the consumption of empty fire-extinguisher for the investigation period suffered from temporal inconsistency, as the Commission applied an import ratio derived from data collected after that period (March–August 2025), which allegedly undermined methodological soundness. Zhejiang Winner further asserted that the conversion of import volumes in weight into units was flawed, as the Commission used an average weight per unit based on the most frequently sold product rather than a weighted average across all relevant product types and CN/TARIC codes. Given that empty fire extinguishers form a material part of the product scope, Zhejiang Winner contended that these alleged flaws compromised the reliability of the overall injury determination. It requested the Commission to revise its estimation methodology and to disclose the detailed conversion factors used.
- (132) The Commission considered that the claim ignored the purpose of the statistical estimates used in the injury analysis. The estimation of the imported volume of empty fire extinguishers are not intended to establish precise absolute volumes, but to assess the evolution of imports of HPSC in the Union during the period considered. In this context, the use of estimates was both appropriate and necessary. Where the product scope does not correspond to 'full' CN codes, estimations based on the best information available allow the Commission to assess how imports developed on the Union market. The relevant question for the injury analysis is whether the observed trend points to injury for the Union industry.
- (133) In the absence of precise data, it was considered that the use of a ratio derived from closely adjacent periods and an average-weight conversion provides a reasonable and coherent basis for assessing market developments. Zhejiang Winner did not demonstrate that any alleged imprecision would distort the trend analysis or alter the overall injury picture. In the absence of evidence of significant market disruption or structural change, the approximations used are sufficient to capture the evolution of the market. Zhejiang Winner did not provide any alternative calculation in this regard. Moreover, the injury determination is based on a comprehensive set of indicators, of which the estimated volumes of empty fire extinguishers represent only one element.
- (134) The Commission also clarified that the reference in the final disclosure to the use of the 'most frequently sold' was incorrect. In the analysis, the Commission relied on the full set of sales data reported by the sampled exporting producers, which was applied consistently across the period concerned to establish the relevant conversion factor. The estimate was therefore not to base on a single product, but on the overall product mix observed in the sample. Considering the confidentiality of the data of the two sampled exporting producers used, the Commission could not disclose the detailed conversion factors used.
- (135) Accordingly, the methodology applied remains objective and appropriate for the purpose of assessing import trends on the basis of the best information available. The use of estimates does not undermine the reliability of the injury analysis, enabling the Commission to form a sound understanding of market evolution in the absence of import data covering only the product scope of the investigation, and the assessment of trends and conclusions of the injury analysis remained therefore unchanged.

4.4. Economic situation of the Union industry

- (136) As indicated in recital 21, the Commission identified at a later stage of the procedure certain types of HPSC that are imported as 'parts of other goods', for which no statistics were available, and were thus not included in the macroeconomic analysis. This distinction, however, is not relevant for the microeconomic assessment. For the purposes of the injury analysis, all types of HPSC forming part of the product concerned were examined comprehensively. The microeconomic indicators were assessed on the basis of the entire product concerned as produced and sold by the sampled Union producers, including HPSC that are parts of other goods. Accordingly, the inclusion of these HPSC does not affect the validity or representativeness of the sample, which continues to reflect the situation of the Union industry as a whole.

- (137) Given that consumption has slightly increased, the market shares of the Union industry were recalculated. Table 6 of the provisional Regulation is revised as follow:

Table 6

Market share Union industry

	2021	2022	2023	IP
Market share (%)	30	25	23	21

Source: Macro and sampled Union producers questionnaire replies.'

- (138) As it was already the case in the provisional regulation, the market share of Union producers continued on a persistent downward path. It declined from 30 % in 2021 to 25 % in 2022, fell further to 23 % in 2023, and reached only 21 % in the IP. This year-on-year erosion in market share reflects the Union industry's progressively diminishing presence in its own market.
- (139) In the absence of comments with respect to the economic situation of the Union industry, the Commission confirmed its conclusions set out in recitals 208 to 245 of the provisional Regulation.

4.5. Conclusion on injury

- (140) The Commission confirmed that the Union industry was appropriately defined and sufficiently representative, that the incorporation of definitive data on HPSC used in fire extinguishers and as parts did not change the trends established at the provisional stage, and that the methodology used to estimate imports was sound in the absence of precise data for the investigation period. The updated analysis showed substantial increases in both the volume and market share of imports from the country concerned, accompanied by a significant price decline, while no new evidence indicated any change to the assessment of the Union industry's economic situation. Consequently, the conclusions in the provisional Regulation in recitals 246 to 250 are confirmed.

5. CAUSATION

- (141) Several exporting producers questioned the causal link between the imports of the product concerned from China and the injury allegedly suffered by the Union industry.
- (142) Ruiying argued that its exports under CN code starting with 7311 only started in 2025 and involved minimal volumes, which were insufficient to cause injury. Zhejiang Winner contended that some of its product control numbers (PCNs) did not correspond to any PCN produced by the Union industry, suggesting that these imports could not have contributed to the injury, and implying the non-existence of production of empty fire extinguishers in the Union.
- (143) The Commission determined that these claims lacked factual basis. Pursuant to Article 4(1) of the basic Regulation, the assessment of injury is based on the overall effect of dumped imports on the Union industry, taking into account total import volumes, prices, and market trends over the investigation period. The analysis does not focus on individual exporters or isolated PCNs but rather on the aggregate impact of all dumped imports. The absence of PCNs matching, accounting for 37 % of the cases, does not imply that the Union industry did not produce comparable products, nor does it negate the impact of the dumped imports on the situation of the Union industry. PCNs may differ due to variations in technical specifications, sizes, or product variants; however, they fall within the same product scope and compete in the same markets. Likewise, the late start and relatively small volume of Ruiying's imports do not eliminate the cumulative effect of Chinese imports during the period considered. Even imports commencing later in the period can contribute to injury through price suppression, market displacement, or anticipation effects, which negatively affected Union producers' sales, pricing strategies, and profitability.

- (144) The Commission noted that, although only 63 % of the PCNs of the sampled Chinese exporting producers matched those of the sampled Union producers, the vast majority of Chinese imports corresponded to PCNs produced by the Union industry, demonstrating a substantial overlap in product types. This confirmed that most dumped imports were directly competing with the models manufactured by the Union industry. The use of PCN ensures like-with-like comparisons, meaning that HPSC are only compared with products sharing the same key characteristics, such as capacity, pressure rating, steel type, and certification, thereby guaranteeing that the assessment of injury and dumping is accurate, representative, and reflective of actual market competition. The proportion of unmatched PCNs (37 % of unmatching) reflects differences in product variants or specialised niche products and does not indicate a lack of production capacity or capability on the part of the Union industry to manufacture the full range of HPSC.
- (145) Zhejiang Winner and Ruiying also argued that other factors, including fluctuations in raw material, energy, and labour costs, competition from third-country imports, and changes in Union consumption – were the primary drivers of the Union industry's economic difficulties.
- (146) The Commission disagreed with this assertion and reconfirmed its conclusions set out in recitals 251 to 268 of the provisional Regulation, in which it also examined other factors, including fluctuations in raw material, energy, and labour costs, competition from third-country imports, and changes in Union consumption.
- (147) While unit production costs increased over the period considered, reflecting higher raw material, energy, and labour expenses, the Union industry was unable to pass these cost increases on to customers due to the sustained price pressure from dumped Chinese imports. The partial decrease in costs observed during the IP did not materially improve the financial situation of Union producers whereby rising costs alone cannot account for the significant deterioration in profitability. On the contrary, the significant decrease in average import prices clearly lead to a deterioration of the economic situation of the Union industry.
- (148) Similarly, imports from other third countries during the period considered were largely stable or even declined, and their market shares did not increase in any way that could have materially harmed the Union industry. Operators from these countries focused on maintaining existing market positions rather than aggressively expand their presence on the Union market. While import prices from third countries were occasionally lower than in previous years, the import volume at stake was insufficient to break or even attenuate the causal link.
- (149) Union consumption grew by approximately 15 % over the period considered. Despite this expansion in demand, the Union industry experienced marked losses in production and sales, further demonstrating that changes in overall consumption could not explain the injury suffered or attenuate the causal link.
- (150) Accordingly, the Commission concluded that these arguments are unfounded and that the dumped imports from China were the main cause of injury to the Union industry. Taken together, the timing, magnitude, and pattern of the Union industry's economic decline align closely with the surge in dumped imports from China, confirming that these imports were the primary and decisive cause of the material injury suffered by the Union industry.

6. LEVEL OF MEASURES

- (151) To determine the level of the measures, the Commission examined whether a duty lower than the margin of dumping would be sufficient to remove the injury caused by dumped imports to the Union industry.
- (152) In the present case, the complainant alleged the existence of raw material distortions within the meaning of Article 7(2a) of the basic Regulation. As set out in recitals 286 to 293 of the provisional Regulation, the Commission provisionally concluded that the conditions for the application of Article 7(2a) were fulfilled. Since no interested party submitted comments contesting these findings, the Commission confirmed its conclusions regarding the existence of raw material distortions within the meaning of Article 7(2a) of the basic Regulation.

6.1. Examination of the margin adequate to remove the injury to the Union industry

6.1.1. General comment on the use of pieces in the injury analysis at provisional stage

- (153) Zhejiang Winner claimed that the use of 'pieces' as the unit of measurement distorted the calculation of the injury margin because its small portable fire extinguishers are not comparable in size or weight to larger industrial high-pressure seamless cylinders (HPSC). It therefore suggested that the analysis should be based on weight rather than on units.
- (154) This claim was rejected. In the ordinary course of trade, empty high-pressure seamless cylinders are sold, invoiced, and priced per unit, not by weight. The market does not value HPSC according to their mass, but rather according to a range of technical and commercial parameters, including the steel grade, design pressure, manufacturing precision, surface treatment, threading, valve configuration, and required certifications (such as PED or TPED). These characteristics determine the HPSC's performance, compliance, and market value far more directly than its weight.
- (155) Furthermore, the PCNs used in the investigation already capture the key physical and technical features of the HPSC, including capacity, pressure tolerance, steel type, and intended use. This granularity ensures that like is compared with like within each PCN, and that differences in size, application, or design are appropriately reflected in the comparison.
- (156) However, for completeness, the Commission also carried out a comparison in weight per PCN between Chinese and Union products. This analysis confirmed that Chinese exported HPSC were generally heavier than comparable Union-produced ones. Accordingly, if the analysis were based on weight, it would in fact result in higher injury margins.
- (157) The use of 'pieces' as the unit of measurement therefore remained methodologically sound and representative of market realities while the use of PCNs ensured a robust like-for-like comparison between products.

6.1.2. Injury margin

- (158) The Commission notes that clerical errors were identified in the provisional Regulation, specifically in the tables in recitals 282 and 309. In particular, the underselling margin for BTIC should have read 21 % instead of 48 % and the underselling margin for other cooperating companies should have been 175,4 %. These corrections were indicated in the cover letter (AD724 Disclosure Letter) sent to all parties and filed in the open case file.
- (159) In recitals 273 to 283 of the provisional Regulation, the Commission set out the methodology used to establish the margins adequate to remove the injury suffered by the Union industry. As no comments were received concerning the determination of the underselling margin, the Commission confirmed its conclusions and methodology as set out in those recitals.

6.1.3. Comparison between dumping margin and underselling margin

- (160) In accordance with Article 7(2) of the basic Regulation, the Commission first examined whether the margin of dumping provisionally established would be higher than the margin adequate to remove the injury to the Union industry. To this effect, the Commission compared the weighted average import price of the cooperating exporting producers with the target price of the Union industry. The result of these calculations is shown in the table below:

Company	Dumping margin (%)	Underselling margin (%)
Winner Group	59,7	283,6
BTIC Group	57,7	21
Other cooperating companies	58,9	175,4
All other imports originating in country concerned	90,3	322,8

- (161) In accordance Article 7(2a) of the basic Regulation, the Commission concluded in the provisional Regulation that the appropriate level to remove injury should be the dumping margin.
- (162) Since the underselling margin for exporting producer BTIC Group was lower than the dumping margin, the Commission assessed whether there were distortions on raw materials with regard to the product concerned, pursuant to Article 7(2a) of the basic Regulation

6.2. Raw material distortions

- (163) In the absence of comments concerning raw material distortions, recitals 287 to 294 of the provisional Regulation were confirmed.

6.2.1. Union interest under Article 7(2b) of the basic Regulation

- (164) The BTIC Group argued that the Commission should have applied the lesser duty rule, noting that the injury margin established at 21 % was considerably lower than their provisional dumping margin of 90,3 %. According to the company, this indicated that a duty based on the injury margin would be sufficient to remove the injury suffered by the Union industry. It further claimed that a duty based on the full dumping margin would effectively exclude the company from the Union market and provide excessive protection to the Union industry, potentially creating a dominant position to the detriment of downstream users. BTIC also contended that the non-application of the lesser duty rule under Article 7(2a) of the basic Regulation should not be automatic, even in cases where raw material distortions are found, referring to other investigations, such as that concerning hot-rolled stainless steel from China, where the Commission applied the lesser duty rule despite similar claims.
- (165) The Commission carefully assessed these arguments and found them to be unfounded. As established in recitals 287 to 294 of the provisional Regulation, the Commission provisionally determined, and now confirms, that the conditions for the application of Article 7(2a) of the basic Regulation were met. The investigation demonstrated the existence of significant distortions affecting the costs and prices of key raw materials used in the production of HPSC in China. In such circumstances, Article 7(2a) of the basic Regulation provides that the lesser duty rule shall not be applied, as these distortions prevent market forces from operating normally and thus undermine the reliability of price and cost comparisons.
- (166) Pursuant to Article 7(2b) of the basic Regulation, the Commission has actively sought information from interested parties in order to determine whether a duty lower than the margin of dumping would be sufficient to remove injury. In doing so, the Commission has considered all pertinent information, including spare capacities in the exporting country, competition for raw materials, and the effects on the supply chains of Union companies.
- (167) However, in the absence of cooperation from users or importers, and in accordance with Article 7(2b) of the basic Regulation, the Commission has concluded that it is in the Union's interest to apply paragraph 7(2a).
- (168) The Commission further rejected the assertion that a duty corresponding to the dumping margin would provide excessive protection or distort competition in favour of the Union industry. The purpose of anti-dumping measures is to re-establish fair trading conditions and remove the injurious effects of dumped imports, not to confer an advantage on the Union industry. Applying the full dumping margin ensures that the identified distortions are properly neutralised and that competition in the Union market is restored on a fair and sustainable basis.
- (169) Finally, the Commission noted that the reference made by BTIC to other investigations, such as hot-rolled stainless steel from China, is not relevant. Each investigation is based on its own facts and market circumstances. In the present case, the evidence of state-induced raw material distortions warranted the non-application of the lesser duty rule in accordance with Article 7(2a) of the basic Regulation.

- (170) On this basis, the Commission concluded that the conditions for disapplying the lesser duty rule were met and therefore confirmed that definitive measures should be based on the full dumping margins established for the cooperating exporting producers.
- (171) In the absence of any other comment concerning Union interest under Article 7(2b), recitals 295 to 308 of the provisional Regulation were confirmed.

6.2.2. Conclusion on Union interest under Article 7(2b) of the basic Regulation

- (172) Considering the above, the Commission confirmed the conclusions in recital 308 of the provisional Regulation that there were no compelling reasons to come to the conclusion that it was not in the Union interest to impose measures on imports of HPSC originating in the PRC.

6.3. Conclusion on the level of measures

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

Country	Company	Definitive anti-dumping duty (%)
People's Republic of China	BTIC Group	57,7
People's Republic of China	Winner Group	59,7
People's Republic of China	Other cooperating companies	58,9
People's Republic of China	All other imports originating in the People's Republic of China	90,3

7. UNION INTEREST

7.1. Interest of users, consumers or suppliers.

- (174) EUROFEU argued that the imposition of anti-dumping duties on HPSC would not be in the Union interest. It claimed that the measures would jeopardise the security of supply, lead to excessive cost increases for downstream users, and create disruptions due to lengthy certification procedures required when changing suppliers.
- (175) The Commission carefully examined these claims and found them to be unfounded. The investigation established that there are no indications of a risk to the security of supply. Union producers possess the technical capability and are willing to allocate capacity to the fire-protection segment once fair market conditions are restored. The current lack of domestic sourcing by the fire protection sector results primarily from the price depression caused by dumped imports from China, which discouraged Union production over time.
- (176) Furthermore, the Commission observed that the size of the HPSC market for fire-extinguisher applications had been overstated. Figures provided by interested parties included welded and aluminium cylinders, which are outside the product scope of this investigation. The relevant segment covered by the investigation therefore represents only a limited share of total demand. In addition, several third countries, such as the United States, India, Turkey, South Korea, and the United Arab Emirates were found to have sufficient spare capacity to supply the Union market at fair prices if required. Experience also shows that Chinese exports to the Union have continued even after the imposition of duties in comparable cases, albeit at non-injurious price levels.

- (177) While the imposition of duties may entail cost increases for downstream users, this burden was considered proportionate to the benefits of restoring fair competition, securing reliable supply, and enabling Union producers to regain sustainable production and market share.
- (178) On this basis, the Commission concluded that the adoption of definitive measures would not endanger the security of supply but would instead restore fair competition and strengthen the resilience of the Union industry. The arguments put forward by EUROFEU were therefore rejected.
- (179) Following final disclosure, HYDAC submitted an end use exemption request, claiming that its bladder accumulator shells are distinct from other HPSC products, not readily interchangeable, and insufficiently available in the Union market.
- (180) HYDAC argued that its shells are partly custom-made, adapted to specific operating conditions, with customized valves, coatings, and materials, and that assembly, testing, and documentation add significant value. It further noted compliance with international standards including PED, ASME, SELO, DNV, and Lloyds Register. HYDAC further claimed that its shells are not interchangeable due to unique drawings, part numbers, and customized assembly and interfaces. HYDAC also asserted limited availability in the Union, citing unsuccessful sourcing attempts, low supplier capacity, and reliance on non-EU producers.
- (181) At the outset, the Commission noted that HYDAC did not provide a sufficiently detailed description of the products for which it claimed an end use exemption.
- (182) The Commission also noted that, while the shells of HYDRAC as described by the company involve customization and additional processing, they do not alter the fundamental physical, technical, or functional characteristics of the shells, which remain standard pressure vessels containing a bladder for hydraulic energy storage. Such features, while affecting customization and added value, do not change the essential characteristics of the shells and do not prevent substitution with other HPSC products and thus do not restrict sourcing from alternative sources. In this regard, the Commission noted that the company did not submit a questionnaire reply and that its cooperation was limited to the submission of comments that were not supported by evidence demonstrating the alleged unavailability of such products on the Union market. The investigation revealed *a contrario* that the products at stake were manufactured by the Union industry.
- (183) In light of the above, the Commission concluded that the end use exemption submitted by HYDAC was incomplete as far as the product to be covered is concerned and that its claim regarding lack of availability was unsubstantiated. The end use exemption request was therefore rejected.

7.2. Conclusion on Union interest

- (184) In the absence of any further comments regarding Union interest, the Commission confirmed its provisional conclusions set out in recitals 310 to 324 of the provisional Regulation and definitively concluded that the imposition of anti-dumping duties on HPSC imported from China is warranted and not against the Union interest.

8. DEFINITIVE ANTI-DUMPING MEASURES

8.1. Definitive measures

- (185) 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.

- (186) 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:

Country	Company	Dumping margin (%)	Underselling margin (%)	Definitive anti-dumping duty (%)
People's Republic of China	BTIC Group	57,7	21	57,7
People's Republic of China	Winner Group	59,7	283,6	59,7
People's Republic of China	Other cooperating companies	58,9	175,4	58,9
People's Republic of China	All other imports originating in country concerned	90,3	322,8	90,3

- (187) 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 imports originating in People's Republic of China'.
- (188) 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 ⁽²⁰⁾. 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*.
- (189) 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 imports originating in People's Republic of China'.
- (190) 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.
- (191) 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.

⁽²⁰⁾ Email: TRADE-TDI-NAME-CHANGE-REQUESTS@ec.europa.eu; European Commission, Directorate-General for Trade, Directorate G, Rue de la Loi/Wetstraat 170, 1040 Bruxelles/Brussel, BELGIQUE/BELGIË.

- (192) To ensure a proper enforcement of the anti-dumping duties, the anti-dumping duty for all other imports originating in the People's Republic of China 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.
- (193) 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.
- (194) Statistics of HPSC frequently expressed in number of pieces. However, there is no such supplementary unit for HPSC specified for all specific CN codes applicable for the product concerned in the Combined Nomenclature laid down in Annex I to Council Regulation (EEC) No 2658/87 ⁽²¹⁾. It is therefore necessary to provide that not only the weight in kg or tonnes but also the number of pieces for the imports of the product concerned must be entered in the declaration for release for free circulation. Pieces should be indicated for CN and TARIC codes.

8.2. Definitive collection of the provisional duties

- (195) 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. Retroactive collection

- (196) As mentioned in section 1.2, the Commission made imports of the product under investigation subject to registration.
- (197) 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.
- (198) The Commission's analysis showed no 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. For this analysis, the Commission compared the monthly average import volumes of the product concerned during the investigation period with the monthly average import volumes during the period from the month following the initiation of this investigation until the last full month preceding the imposition of provisional measures. Also, when comparing the monthly average import volumes of the product concerned during the investigation period with the monthly average import volumes during the period from the month following the initiation of this investigation (i.e. 6 December 2024) until the last full month preceding the imposition of provisional measures (i.e. July 2025), no further substantial increase could be observed:

	Monthly average import volume in pieces in the IP	Monthly average import volume in pieces in the period December 2024 to July 2025
The PRC	444 456,92	314 786,38

⁽²¹⁾ Council Regulation (EEC) No 2658/87 of 23 July 1987 on the tariff and statistical nomenclature and on the Common Customs Tariff (OJ L 256, 7.9.1987, p. 1, ELI: <http://data.europa.eu/eli/reg/1987/2658/oj>).

9. FINAL PROVISION

- (199) 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.
- (200) 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 high-pressure seamless cylinders for compressed or liquefied gas, of steel, of all diameters and volume capacities, whether or not threaded, regardless of internal coating or plating, regardless of external finishing and shape, whether or not with a gas bladder inserted, regardless of the cylinders' fitting with a valve, neck ring, foot ring or piping, whether or not fastened together to form a bundle,, currently falling under CN codes ex 7311 00 11, ex 7311 00 13, ex 7311 00 19, ex 7311 00 30, ex 8424 10 00, ex 8424 90 80 and ex 8479 90 70 (TARIC codes 7311 00 11 15, 7311 00 11 80, 7311 00 13 15, 7311 00 13 80, 7311 00 19 15, 7311 00 19 80, 7311 00 30 15, 7311 00 30 80, 8424 10 00 11, 8424 10 00 21, 8424 90 80 60 and 8479 90 70 60) and originating in the People's Republic of China.

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:

Country of origin	Company	Definitive anti-dumping duty (%)	TARIC additional code
The People's Republic of China	Zhejiang Winner Fire Fighting Equipment Co., Ltd.	59,7	89TF
The People's Republic of China	Tianjin Tianhai High Pressure Container Corp., Ltd Jiangsu Tianhai Special Equipment Co., Ltd Kuancheng Tianhai Pressure Container Co., Ltd.	57,7	89TG
The People's Republic of China	Other cooperating companies listed in Annex	58,9	See Annex
The People's Republic of China	All other imports originating in The People's Republic of China	90,3	8999

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 (volume in unit we are using) of (product concerned) sold for export to the European Union covered by this invoice was manufactured by (company name and address) (TARIC additional code) in [country concerned]. I declare that the information provided in this invoice is complete and correct.' Until such invoice is presented, the duty applicable to all other imports originating in the People's Republic of China shall apply.

⁽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 (OJ L, 2024/2509, 26.9.2024, ELI: <http://data.europa.eu/eli/reg/2024/2509/oj>).

4. Where a declaration for release for free circulation is presented in respect of the product referred to in paragraph 1, irrespective of its origin, the pieces of the products imported shall be entered in the relevant field of that declaration if another supplementary unit is not already defined for a specific CN code and accordingly for TARIC codes by the provisions of Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff.
5. Member States shall, on a monthly basis, inform the Commission of the number of pieces imported under CN/TARIC codes as in paragraph 1.
6. 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 Implementing Regulation (EU) 2025/1711 shall be definitively collected. The amounts secured in excess of the definitive rates of the anti-dumping duty shall be released.

Article 3

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 October 2023 to 30 September 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 4

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, 3 February 2026.

For the Commission
The President
Ursula VON DER LEYEN

ANNEX

Cooperating exporting producers originating in the People's Republic of China not sampled

Country	Name	TARIC additional code
PRC	Anhui Clean Energy Co. Ltd.	89TH
PRC	Chasing Technology (Changxing) Co., Ltd	89TI
PRC	Jiangsu Minsheng Heavy Industry Co.,Ltd.	89TJ
PRC	Leebucc (Tianjin) Hydraulics Equipment Co., Ltd.	89TK
PRC	Shandong Hongsheng Pressure Vessel Co., Ltd.	89TL
PRC	Shandong Huachen High Pressure Vessel Group Co., Ltd	89TM
PRC	Shandong Huachen High Pressure Vessel Group Dezhou Co., Ltd.	89TN
PRC	Shandong Yongan Special Equipment Co., Ltd	89TO
PRC	Shaoxing Reach Fire Fighting Equipment Co., Ltd.	89TP
PRC	Sinoma Science & Technology (Chengdu) Co., Ltd.	89TQ
PRC	Sinoma Science & Technology (Jiujiang) Co., Ltd.	89TR
PRC	Sinoma Science & Technology (Suzhou) Co., Ltd.	89TS
PRC	Zhejiang Jindun Pressure Vessel Co., Ltd.	89TT
PRC	Zhejiang Rein Hytec Co.,Ltd.	89TU
PRC	Zhejiang Super Power Fire Fighting Equipment Co., Ltd.	89TV
PRC	Zhuolu High Pressure Vessel Co.,Ltd.	89TW