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EXECUTIVE SUMMARY OF THE ANTI-DUMPING COMPLAINT CONCERNING IMPORTS OF STEEL WIND TOWERS (“SWT”) FROM THE PEOPLE REPUBLIC OF CHINA

1. PRODUCT CONCERNED

Representative product:

The product concerned is steel wind towers (“SWT”) id est certain utility scale wind towers, whether or not tapered, and sections thereof, whether assembled or not, whether or not including an embedded tower foundation section, whether or not joined with nacelles or rotor blades, and that are designed to support the nacelle and rotor blades for use in wind turbines that have electrical power generation capacities – either in onshore or offshore applications – equal to or in excess of 1.00 megawatt (MW) and with a minimum height of 50 meters measured from the base of the tower to the bottom of the nacelle (i.e. where the top of the tower and nacelle are joined) when fully assembled.

A wind tower section consists of steel plates rolled into cylindrical or conical shapes and welded together (or otherwise attached) to form a steel shell, whether or not coated, end-finished or painted, irrespective of treatment or method of manufacture, and with or without flanges, doors, or internal or external components (e.g., flooring/decking, ladders, lifts, electrical junction boxes, electrical cabling, conduit, cable harness for nacelle generator, interior lighting, tool and storage lockers) attached to the wind tower section.

Wind turbines’ maximum heights can easily reach 140 meters, and steel wind towers exceeding 165 meters height are also being developed and built.

The typical SWT product concerned is composed of 3 to 7 sections, most commonly of 4 sections.

The CN codes concerned are:

- **CN 7308 20 00** - Towers and lattice masts. This code applies to wind towers when imported as a tower or tower sections(s) –i.e. to complete wind towers, where sections are assembled, or not assembled wind towers, i.e. where sections are not assembled. This is the relevant code for the product concerned.
- **CN 7308 90 98 – Other**. This code should also be included in the product scope. In fact, this code applies for steel tower sections, including inter alia sections with doors, whether assembled or disassembled, provided there aren’t enough in a shipment to be judged to be a complete tower.
- **CN 8502 31 00 - Generating sets, wind-powered**. According to the information provided by the complainants and supporters, steel wind towers are also imported in the EU from the People’s Republic of China under this code. It is therefore important that the investigation also factors products falling under this CN. It is observed that the products

falling under CN 8502 31 00 are being investigated by the competent authorities in the U.S.A. and Mexico.

2. CASE SUMMARY

Standing: This complaint is brought by the European Wind Tower Association A.I.S.B.L (“EWTA”) on behalf of 6 complainants who are European Union producers of SWT products, which represent the overwhelming majority (circa 60%) of SWT production in the EU.

Dumping: The complaint provides information on Turkish Constructed Normal Value and People’s Republic of China’s Export Prices.

The application presents evidence that Chinese exports are dumped on the EU market at substantial levels which vary between 43% and 62%, depending on the type of SWT. The average dumping margin for SWT is 55% during 2019.

Injury and causation: The European Union’s SWT Industry is suffering present material injury, which is due to the dumped subject imports. The injury resulted from a combination of a surge in subject import volumes from the People’s Republic of China and very low import prices, which undercut EU producers. The pressure by imports from the People’s Republic of China left EU producers no choice but to also drop their prices so as not to have plants idle and try to stay competitive. As a result, pressure by dumped imports led to price suppression, which drove the industry into losses in recent financial quarters. EU producers’ production and sales also suffered as several EU SWT producers went bankrupt in the period from 2016 to the investigation period.

Union interest: The complaint demonstrates that non-imposition of measures will hurt the Union industry, which will continue to suffer material injury by reason of the subject imports. The imposition of commensurate anti-dumping measures should not prevent imports from the People’s Republic of China from entering the EU and will have a minimal impact on downstream users’ costs.

3. Interested parties

3.1. *Complainants in the EU:*

The applicant is the European Wind Tower Association A.I.S.B.L (“EWTA”) on behalf of the following six European Union producers of SWT:

ASM Industries S.A.

GRI Renewable Industries S.L.

Tecnoaranda S.L.

Valmont SM A/S

Welcon A/S

Windar Renovables S.L.

3.2. Exporting Producers in the People's Republic of China:

People Republic of China - Steel wind towers exporting producers
Chengxi Shipyard
Nanjing Jiangbiao
Jiangsu Shenshan WPE
Zhongshan WPE (Lianyungang)
Titan Wind
AVIC Hongbo WPE
Beiche Tongli Steel Structure
Shandong Zhongkai H.I.
Qingdao Wuxiao Group
Qingdao Tianneng EPEM
Qingdao Haoyu H.I.
Shandong Idris WPTE
Shanghai Taisheng WPE (TSP)
Gezhouba Neimenggu WP
Liaoning Dajin H.I.
Liaoning Huayuan WPEM
Suizhong ZhongCheng WTM
Jilin Tianhe Wind Power
Harbin Hongguang Boiler Group
NingQiang Group
Hebei Hesheng EEP
Jiangsu Baolong WTM
Jusco Guazhou Great Wall EPE
Gansu Keyao Electric Power
CRRC Tongli Steel
CS Wind
Dajin Heavy Industry

Fuchuan Yifan

Jiangsu Haili

Whuhan Huadan Steel Structure

Qingdao Greef New Energy Equipment Co., Ltd.

Luoyang Bota Heavy Industry Machinery Equipment Co., Ltd

Qingdao Yuxi Wind Power Equipment Co., Ltd

Wuxi Ferra Mechanical & Electric Technology (FME) Co., Ltd

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