

Executive summary of the

**Request for the initiation of an expiry review
concerning anti-dumping measures
against imports of certain ring binder mechanisms
originating in the People's Republic of China**

submitted by BEITEN BURKHARDT
on behalf of the EU industry of ring binder mechanism manufacturers

1. The product

Ring binder mechanisms, or RBM in short, are used for a variety of purposes including software manuals, catalogues and brochures, technical manuals, as well as photo and stamp albums.

Ring binder mechanisms are sold in a large variety of forms which have been evolving over time. However, all ring binder mechanisms fulfil the same purpose, have the same end use and are produced by the same manufacturers in the same production facilities with an identical overall production process.

1.1 Physical and technical characteristics of the product concerned

Ring binder mechanisms consist of at least two steel sheets or wires with at least four half rings made of steel wire fixed on them and which are kept together by a steel cover. They can be opened either by pulling the half rings or with a small steel-made trigger mechanism fixed to the ring binder mechanism. In the European Union mostly 2 and 4 ring mechanisms are sold whereas in the United States mostly large 3 ring binder mechanisms with triggers are sold.

The mechanisms produced in third countries for export to the European Union are the same as those produced in the European Union. This was last confirmed in the anti-circumvention proceeding concluded by [Council Regulation 818/2008](#) which amended the scope of the measures to slightly modified ring binder mechanisms.

Other types of archiving systems are lever arch mechanisms or LAM in short, which do not fall in the scope of the product concerned in this application.

1.2 Customs classification and treatment

Ring binder mechanisms are classified under tariff heading 8305 10 00.

The current most favoured nation customs duty rate is 2.7 percent ad valorem which applies to imports, unless suspended or reduced under the Generalized System of Preferences (GSP).

Additional tariff subheadings were introduced by the anti-dumping measures.

2. Executive summary

This request for the initiation of an expiry review of anti-dumping measures concerns imports of certain ring binder mechanisms originating in the People's Republic of China. It is submitted by the Alliance Ringbuchtechnik GmbH and the Koloman Handler

Fémárugyár Magyarország Kft. The ultimate parent of both is the Ring International Holding AG, Vienna. The applicant accounts for the majority of the European Union production of the like product.

Most other former known EU producers have abandoned production of ring binder mechanisms and either import the products from Asia or have been forced to withdraw from the business completely. The last other Union producer, the Italian company IML Industria Meccanica Lombarda SRL still has a remaining production in Italy.

At the time of the original proceeding, four producers of ring binder mechanisms existed in the then European Community. Despite trade defence measures, these producers continued to suffer from injurious dumping, most notably through circumvention. In the meantime, the Union industry has restructured and only two producers have survived but safeguarded employment not only at their plants but up- and downstream.

At the moment imports of ring binder mechanisms are subject to anti-dumping measures. The scope of the measures was amended by [Council Regulation 818/2008](#) in order to extend the measures to slightly modified ring binder mechanisms.

The measures on exports from China were being circumvented. Therefore, the measures were extended against imports via Vietnam and Laos by [Council Regulation 1208/2004](#) and [Council Regulation 33/2006](#) respectively.

Although circumvention practices concerning shipments via Thailand could not be ascertained, a subsequent investigation on imports of ring binder mechanisms from Thailand led to trade defence measures in 2011 by [Council Regulation 792/2011](#). Thereafter, the Thai “production” site was abandoned by its Chinese investors, and the measures regarding imports from Thailand were allowed to lapse.

Following an expiry review, the measures on imports from China were extended by [Commission Implementing Regulation 2016/703](#).

Regarding the continuation and/or recurrence of dumping and the continuation and/or recurrence of injury to the EU industry, data for the four years 2017 through 2020 were provided in this request.

3. Likelihood of continuation and/ or recurrence of dumping

Despite trade defence measures in force, Chinese exporting producers continue to sell RBM at dumped prices. Against this background and on the basis of the facts set out below, it is highly likely that the Chinese exporting producers would continue selling at dumped prices in the European Union should the existing measures be allowed to lapse.

The Chinese exporting producers continue to manufacture ring binder mechanisms in the People's Republic of China for export to the European Union, which is the largest market for 2, 3 and 4 ring binder mechanisms worldwide. Over the last decades, capacities have been built up in China well beyond domestic demand – supported by the Chinese State notably as regards land or rental costs, energy and steel – for an export-oriented production. The existing production in China of RBM is well below the available capacity, at about half the capacity. Further increases in capacity and output would also pose no problem even in the short term for the product concerned.

The consumption of RBM worldwide is slightly shrinking year on year, and this means that selling on the EU market remains attractive in terms of volume and prices and would become much more attractive without trade defence measures.

Testimonies to the attractiveness of the EU market are also the circumvention operations, from slightly modified products to “country hopping”.

The price level for sales to third countries provides an indication for the likely development of import prices should measures be allowed to lapse.

4. Likelihood of continuation and/ or recurrence of injury

The Union industry has been particularly hit by injurious dumping in the past and would suffer material injury were trade defence measures allowed to lapse. The likely forced reduction of prices would lead not only to undercutting of Union prices but to unprofitable sales. The ensuing losses will in turn endanger the employment opportunities at the Union producers and the very existence of the remaining producers. Upstream and downstream, producers and users will lose customers and choice.

The imports from China, Indonesia and Thailand have been found dumped and injuring the European Union industry. The circumvention operations and the production transfers by Chinese exporting producers from China to sites in other countries like Cambodia, India and Thailand demonstrate that they continue to be strongly interested in selling to the EU markets. Especially the largest producer of Chinese RBMs, World Wide Stationery, has over many years established a well-functioning EU-wide

network of distributors. The termination of the trade defence measures would enable the largest exporting producer to easily and speedily increase its market presence with dumped products.

In any event, there was a likelihood of recurrence of material injury should measures be allowed to lapse.

5. Interested parties

5.1 European Union producers and applicants

5.1.1 Applicant

1. Ring Alliance Ringbuchtechnik GmbH
2. Koloman Handler Fémárugyár Magyarország Kft

Ring International Holding AG, Vienna, is the ultimate parent of both Ring Alliance Ringbuchtechnik GmbH and Koloman Handler Fémárugyár Magyarország Kft.

5.1.2 Other Union producers

IML Industria Meccanica Lombarda SRL

5.2 Chinese exporting producers

- World Wide Stationery
- Wah Hing Stationery Manufactory
- Sure Success
- US Ring Binder Corporation
- JDS
- Paramount
- Chung Tin Group Holdings Ltd
- Anhui Qitian Stationery Mfg Co., Ltd
- GuangZhou GuoHua Stationery and Hardware Co., Ltd
- Guangzhou Weichen Stationery

5.3 Importers and distributors

- PERFECT FOIL BV
- PLANDIURA S.L.
- PANTA Sp z o.o.
- CAVALLINI SRL

5.4 Users

- Primason Produktions GmbH
- Hellyn Kartonnage
- Vinya
- Achilles Präsentationsprodukte GmbH
- Carl Berberich GmbH
- Bodensee Organisation Products GmbH & Co KG
- A.C.I.
- Swedex Hungaria Kft.
- Cardea srl
- Fisadorelli s.r.l.
- Moeskops Graf. Afwerkingsbedrijf B.V.
- Venttri
- Profilskaparen AB
- Plast Petter AB