



ANKARA DEMİR VE DEMİR DIŐI
METALLER
İHRACATÇILARI BİRLİĐİ

Sayı: 21704200-TİM.OAİB.11.ARG7.2026/191-9598
Konu: AB/Çelik Halat ve Kablo Anti Damping Soruőturması

Ankara, 28/09/2026

Sayın Üyemiz,

Ticaret BakanlıĐından alınan bir yazıda ifade edildiĐi üzere, Avrupa BirliĐi (AB) tarafından ölkemizin yanı sıra Hindistan ve Tayland menőeli belirli “çelik halat ve kabloların” (certain steel wire ropes and cables) (AB gümrük sınıflandırmasında ex 7312 10 81, ex 7312 10 83, ex 7312 10 85, ex 7312 10 89 ve ex 7312 10 98 CN gümrük tarife pozisyonları altında yer alan) ithalatına karőı 24 Eylül 2026 tarihinde bir anti-damping soruőturması baőlatılmış olup; açılıő bildiriminin bir örneĐi ekte yer almaktadır. Ayrıca, bahse konu açılıő bildirimine, AB Resmî Gazetesi’nin sayfasında aőaĐıdaki baĐlantıdan ulaőılabilmektedir.

BaĐlantı: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C_202604914

BilindiĐi üzere, yerli sanayilerin, üretimini gerçekteőtirdikleri benzer veya doğrudan rakip mal konumundaki bir ürün grubunun ithalatı nedeniyle uğradıklarını iddia ettikleri maddi zararı önlemek için ölkeler, ticaret politikası önlemlerine baővurabilmekte ve mevcut gümrük vergilerinin üzerine ek yükümlölükler getirebilmektedirler. Bahse konu zarar olgusu, ilgili ürün ihracatçılarının, ithalatçı ölkede pazarında iç piyasalarından farklı fiyat politikaları izlemelerinden, yani dumping uygulamalarından kaynaklanabilmektedir. Bu itibarla, bahse konu anti-damping soruőturması çerçevesinde ölkemiz menőeli “çelik halat ve kabloların” ithalatının dumpingli olup olmadığı, ayrıca bu süreçte dumpingli olduĐu iddia edilen ölkemiz menőeli ilgili ürün ithalatının AB yerli üretimi üzerinde bir zarara yol açıp açmadıĐı deĐerlendirilecek olup; soruőturma otoritesi tarafından bu hususlarda müspet karar verilmesi halinde ölkemiz firmalarına anti dumping önlemi tatbik edilmesine hükmedilmesi olasılık dahilindedir.

Bu çerçevede, bahsi geçen açılıő bildiriminin “2. Product under investigation” baőlıĐı altında soruőturma konusu ürünler tanımlanmış olup; burada tanımlanan ürün yelpazesine iliőkin yapılacak yorumların 10 gün içerisinde Komisyon’a iletilmesi gerekmektedir.

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TİM TÜRKİYE





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İhracatçı soru formlarına <https://tron.trade.ec.europa.eu/investigations/case-view?caseId=2812> adresinden ulaőılabilmektedir. Örnekleme formlarının, Komisyon tarafından incelenmesinin ardından ihracatçılara örneklemeye seğılip seğılmedikleri bildirilecek olup; bildirimin ardından örneklemeye seğılen ihracatçıların 30 gün içerisinde soru formu yanıtlarını Komisyon’a iletmesi beklenmektedir. Örneklemeye itirazların olması halinde, Komisyon’un örnekleme kararını bildirmesinden 3 gün içerisinde bu itirazlar Komisyon’a yapılabilecektir. Őikâyet (zarar ve nedensellik bağına dair hususlar da dahil olmak üzere) veya soruőturmanın açılmasına ilişkin görüş bildirmek isteyen tarafların ise soruőturma açılıő tarihinden itibaren 37 gün içerisinde görüşlerini Komisyon’a iletmesi gerekmektedir. Ayrıca, soruőturmanın açılmasına ilişkin bir dinleme toplantısı talebi varsa; bu talebin, açılıő bildiriminin yayımı tarihinden itibaren 15 gün içerisinde Komisyon’a bildirilmesi gerekmektedir.

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Diğer taraftan, firmalarımızın Türkiye İhracatçılar Meclisi tarafından düzenlenen “Ticaret Politikası Önlemleri Soruőurmaları ve Genelleőtirilmiş Tercihler Sistemi Uygulamaları Kapsamında Firmalarca Alınacak Avukatlık ve/veya Danışmanlık Hizmeti Harcamalarının Desteklenmesine İliőkin Uygulama Usul ve Esasları”nı incelemesinde fayda mütalaa edilmektedir.

Anılan soruőturmaya ilişkin olarak önümüzdeki dönemde izlenecek yol haritasının belirlenmesi amacıyla bir toplantı tertip edilmesi yönündeki taleplerin Birliğimiz adresine (demir@oaib.org.tr) en geç 1 Ekim 2026 tarihine kadar bildirilmesi gerekmektedir.

Bilgilerini rica ederim.

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Ek: Kamuya Açık Őikâyet Metni

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Steel ropes and cables from India, Thailand and Türkiye
Complaint under Article 5 of the Regulation 2016/1036

by

European Federation of Steel Wire Rope Industries (“EWRIS”)



Open Version

lodged on 7 August 2026

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1. Executive summary

1. The European Federation of Steel Wire Rope Industries (“EWRIS” or “Complainant”), on behalf of its EU members requests the European Commission (“Commission”) initiate an anti-dumping (“AD”) investigation on imports of certain steel wire ropes and cables (“SRC” or “products concerned”) from the Republic of India (“India”), the Kingdom of Thailand (“Thailand”) and the Republic of T rkiye (“T rkiye”) pursuant to Article 5 of the Basic Regulation¹ (the “Complaint”).
2. SRCs are mainly used for heavy lifting and as support for large static structures such as bridges and stadium roofs. The EU is a highly attractive market because it is one of the largest in the world and home to essentially all SRC user industries, including fishing, maritime, shipbuilding, oil and gas, mining, forestry, aerial transport, automotive, civil engineering, construction and elevators.
3. Third country SRC producers have repeatedly assaulted the EU market with dumped imports. Over the last 25 years, the EU has imposed AD and anti-circumvention (“AC”) duties on SRC imports from *inter alia* China, Hungary, India, Mexico, Poland, South Africa and Ukraine²; Moldova³; Morocco⁴; and South Korea,⁵ and Czechia, Russia, Thailand and T rkiye.⁶
4. The AD measures on imports of SRC from China (and the related AC measures on imports from Morocco and South Korea) were last extended in June 2024.⁷ The initial AD measures on imports of SRC from Thailand and T rkiye were discontinued in 2007, and the measures on

¹ 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, OJ 2016 L 176/21.

² Regulation 1796/1999 of 12 August 1999 imposing a definitive anti-dumping duty, and collecting definitively the provisional duty imposed, on imports of steel ropes and cables originating in the People’s Republic of China, Hungary, India, Mexico, Poland, South Africa and Ukraine and terminating the anti-dumping proceeding in respect of imports originating in the Republic of Korea, OJ 1999 L 217/1.

³ Council Regulation (EC) No 760/2004 of 22 April 2004 extending the definitive anti-dumping duty imposed by Regulation (EC) No 1796/1999 on imports of steel ropes and cables originating, *inter alia*, in Ukraine to imports of steel ropes and cables consigned from Moldova, whether declared as originating in Moldova or not, OJ 2004 L 120/1.

⁴ Council Regulation (EC) No 1886/2004 of 25 October 2004 extending the definitive anti-dumping duty imposed by Council Regulation (EC) No 1796/1999 on imports of steel ropes and cables originating, *inter alia*, in the People’s Republic of China to imports of steel ropes and cables consigned from Morocco, whether declared as originating in Morocco or not, and terminating the investigation in respect of imports from one Moroccan exporter, OJ 2004 L 328/1.

⁵ Implementing Regulation of the Council (EU) No 400/2010 of 26 April 2010 extending the definitive anti-dumping duty imposed by Regulation (EC) No 1858/2005 on imports of steel ropes and cables originating, *inter alia*, in the People’s Republic of China to imports of steel ropes and cables consigned from the Republic of Korea, whether declared as originating in the Republic of Korea or not, and terminating the investigation in respect of imports consigned from Malaysia, OJ 2010 L 117/1.

⁶ Council Implementing Regulation (EU) No 1342/2013 of 12 December 2013 repealing the anti-dumping measures on imports of certain iron or steel ropes and cables originating in the Russian Federation following an expiry review pursuant to Article 11(2) of Regulation (EC) No 1225/2009.

⁷ See Commission Implementing Regulation (EU) 2024/1666 of 6 June 2024 imposing a definitive anti-dumping duty on imports of steel ropes and cables originating in the People’s Republic of China as extended to imports of steel ropes and cables consigned from Morocco and the Republic of Korea, whether declared as originating in these countries or not, following an expiry review pursuant to Article 11(2) of Regulation (EU) 2016/1036 of the European Parliament and of the Council.

imports from India were discontinued in 2010, based on the finding that the exporting producers had ceased their unfair market behaviour.⁸

5. However, in recent years, the situation with regard to imports from these three countries has changed significantly. Indian, Thai and Turkish producers have resumed the export of increasing volumes of highly dumped and undercutting SRC to the EU market, and have thereby been causing material injury to the EU industry.
6. The situation has been getting worse and now needs urgent attention. In line with the EU’s 2025 Metals and Steel Action Plan,⁹ the Complainant therefore asks the Commission to initiate an AD investigation with a view to imposing AD measures in order to re-establish a level playing field on the EU market.

2. Interested parties

7. This Complaint is brought by EWRIS on behalf of its EU SRC-producing members which represent more than 50% of the total EU production of SRC (POA attached as **Annex 1**). Industry support for the Complaint thus meets the standing requirement of Article 5(4) of the Basic Regulation. **Annex 2** contains a list of the known EU producers and indicates the companies supporting this Complaint. The calculation of the support for the Complaint is attached as **Annex 3**.
8. The contact details of the known exporting producers in India, Thailand and T rkiye are attached as **Annex 4**. The known importers are listed in **Annex 5**. There are several hundred users of SRC in the EU. **Annex 6** lists the largest EU users with their contact details.

3. Period examined in this Complaint

9. The investigation period (“IP”) used in this Complaint to assess dumping, undercutting and underselling is the calendar year 2025. The performance of the EU industry is assessed for the calendar years 2022 to the IP (“period under consideration”).
10. Because of the exceptional market situation caused by the global COVID measures and the post-COVID market developments, as described paragraph 59, the Complaint also refers to 2019 data, where appropriate, to provide a more complete overview of the overall evolution of the imports from the subject countries and other market trends.

4. The product concerned and the like product

11. This Complaint concerns imports of the product concerned, as further described in this section, from the subject countries, whether imported by the exporting producers directly or via related or unrelated intermediate parties in the EU or third countries.

⁸ See Council Regulation (EC) No 1279/2007 of 30 October 2007 imposing a definitive anti-dumping duty on certain iron or steel ropes and cables originating in the Russian Federation, and repealing the anti-dumping measures on imports of certain iron or steel ropes and cables originating in Thailand and Turkey, recital 209. See Notice of the expiry of certain anti-dumping measures, 2010/C 311/07, OJ C 311, 16 November 2010, pages 16-16. AD measures against several other countries have also been discontinued over the years.

⁹ The Plan underlines the importance of trade defence measures in the metals and steel industry, and confirms that the Commission “stands ready to make use of the trade defence instruments”.

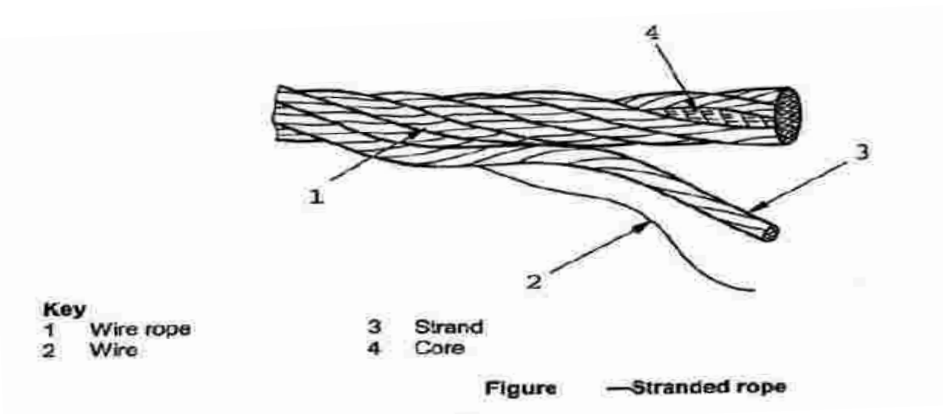
4.1. Product definition and classification

12. The product concerned is steel ropes and cables, including locked coil ropes, excluding ropes and cables of stainless steel, with a maximum cross-sectional dimension exceeding 3 mm and originating in India, Thailand and Türkiye.¹⁰ The product concerned falls under CN codes ex 7312 1081, ex 7312 1083, ex 7312 1085, ex 7312 1089 and ex 7312 1098.¹¹
13. There are presently no *ad valorem* customs duties applicable to SRC products originating in India, Thailand and Türkiye.

4.2. Manufacturing process, product characteristics and uses

14. SRC are generally round in cross-section but may also be rectangular. SRC may be cut to length or fitted (with hooks, rings) and may be covered with plastic.
15. SRC are composed of wires¹² formed to strands,¹³ and wrapped around a core.

Figure 1 – Components of a SRC



Source: Complainant

16. The manufacturing process of SRC includes the following main steps:
 - **Stranding:** Steel wires (the main raw material) are assembled together to form a strand by laying several wires helically in the same direction in one or more layers around a centre. Each strand consists of a number of wires closely twisted together in different geometric patterns or formations¹⁴;

¹⁰ The product concerned has remained unchanged since the original investigation. See Regulation 1796/1999, recitals 4-8; Regulation 1858/2005, recital 18; Regulation 2018/607, recital 27; Regulation 102/2012, recital 19.

¹¹ TARIC codes 7312 10 81 12, 7312 10 81 13, 7312 10 81 19, 7312 10 83 12, 7312 10 83 13, 7312 10 83 19, 7312 10 85 12, 7312 10 85 13, 7312 10 85 19, 7312 10 89 12, 7312 10 89 13, 7312 10 89 19, 7312 10 98 12, 7312 10 98 13 and 7312 10 98 19.

¹² CN codes 7217 1090 and 7217 2090.

¹³ CN codes 7312 1061, 7312 1065, and 7312 1069.

¹⁴ Common stranding patterns are e.g. the “standard”, “seal”, “filler” or “warrington” patterns.

- **Closing:** Several strands are then assembled around a core. The core can be of fibre (“FC”)¹⁵, steel (independent wire steel core (“IWRC”) or wire strand core (“WSC”)), a combination of fibre and steel, or for certain applications of other materials (e.g. hemp).
 - **Coating:** SRC can be used in uncoated form (referred to as bright) or galvanised¹⁶, i.e. zinc-coated.
 - **Packing:** SRC are usually wired lengthwise around wooden or steel reels for transport. They may however also be sold in coils (i.e. without a reel).
17. Depending on user requirements, a wire rope is described by several or all of the following characteristics: length, diameter, whether it is pre-formed¹⁷, the number of strands and the nominal number of wires per strand, the finish, and the grade of steel.
18. SRCs are mainly used (i) for heavy lifting (e.g. in mineshafts, fishing vessels, cranes, elevators, cable cars such as ski lifts), and (ii) as support for large static structures such as bridges and stadium roofs. SRC are broadly categorised as either general-purpose ropes or special purpose ropes that are tailored to the needs of a specific industry sector, such as fishing, maritime, shipbuilding, oil and gas, mining, forestry, aerial transport, automotive, civil engineering, construction and elevators. General and special purpose ropes are all produced from the same raw materials and the same production processes.¹⁸ While the latter are produced with a specific use in mind (for instance, salt water use in the maritime sector) there is generally a significant level of (price-sensitive) substitutability in those industries where SRC are used as “consumables” (e.g. ropes for cranes, fishing equipment) rather than structural parts (e.g. bridges, cable cars).
19. Sample brochures showing the product characteristics and different uses are attached as **Annex 7**.¹⁹

4.3. The like product

20. The product concerned produced in India, Thailand or T rkiye (whether sold in India, Thailand or T rkiye, or exported to the EU) and the product produced by the Union industry (and sold in the EU), have the same basic physical, technical and chemical characteristics, as well as the same uses.²⁰

¹⁵ Fibre cores can be made of natural (usually sisal) or synthetic (usually in polypropylene) materials.

¹⁶ The coating can be applied on the final rope but also on the strand bundles and even on individual strands. In the former case, the galvanisation occurs after thermal treatment and before the final processing stage.

¹⁷ Pre-formed means that the strands have been twisted slightly already before they are put together in the rope. This can also be done for the wires when making strands.

¹⁸ See **Annex 8**, Production process worldwide.

¹⁹ The Complainant provides as examples brochures from EU SRC producers that were among the companies sampled in previous investigations of imports of SRC from China (R793 and R655).

²⁰ See also Regulation 1796/1999, recitals 9-12, Regulation 1858/2005, recitals 19-20, Regulation 102/2012, recital 20, Regulation 2018/607, recital 27, Regulation 2024/1666, recitals 39-40. See also **Annex 8**, Production process worldwide. See also General Court, judgment of 17 December 2010, *EWRIA and Others v Commission*, case T-369/08, ECLI:EU:T:2010:549, paragraphs 76 and following. The Court rejected the claim that the Commission committed a manifest error of assessment in not differentiating between general and special purpose ropes in the investigation.

21. Therefore, EU-produced SRC are like products to the product concerned produced in the subject countries within the meaning Article 1(4) of the Basic Regulation.

5. The SRC industries and markets globally and in the subject countries

5.1. Global demand and capacities

22. SRC is produced in many countries worldwide. Besides India, Thailand, T rkiye and the EU, there are significant production capacities in Argentina, Brazil, Canada, China Egypt, Iran, Japan, Korea, Mexico, Russia, Saudi Arabia, the United Kingdom (“UK”), and the United States (“US”).²¹
23. During the IP, global production capacities were approximately 8.3 million MT and global demand was at approximately 4.8 million MT.²²

5.2. Indian SRC market

24. There are approximately 16 known large Indian SRC producers, including Bharat Wire Ropes Ltd (“Bharat” or “BWR”), Bedmutha Industries Ltd (“Bedmutha”), Bansal Wire Industries (“Bansal”), Tata Steel and Usha Martin Ltd. (“Usha Martin”).²³
25. To the Complainant’s best knowledge, the Indian SRC industry is active in essentially all market segments, providing both general-purpose and special-purpose SRC to several industries, including construction and engineering, oil and gas, mining and shipping.²⁴
26. Domestic production capacities in India were approximately 290,000 MT in the IP.²⁵ Domestic demand was approximately 147,000 MT, and total exports were around 73,000 MT.²⁶ Indian overcapacities²⁷ and spare capacities²⁸ of approximately 143,000 MT and 71,000 MT represent more than 85% and 42% respectively of total EU demand in the IP, 168,000 MT.²⁹
27. Many large Indian producers have increased their production capacities in recent years. For example, Global Wires India, part of the Tata Steel Group, has been significantly expanding its SRC production capacities in recent years, aiming to double production capacities by 2030.³⁰ Bharat built a second production facility in Chalisgaon in a record time of only eighteen months

²¹ See **Annex 9**, List of third country SRC producers.

²² See **Annex 11**, Maia Research report (TH, IN) / (TH, TU), pages 30 and 32.

²³ See **Annex 4**, List of known exporting producers.

²⁴ See **Annex 13**, Market Research – Indian Steel Wire Rope Market, page 4.

²⁵ See **Annex 11**, Maia Research report (TH, IN), page 41.

²⁶ See **Annex 11**, Maia Research report (TH, IN), page 43, **Annex 12**, Indian export statistics.

²⁷ Overcapacities are calculated as the difference between Indian production capacities and Indian domestic demand. We assume that Indian demand is supplied essentially exclusively by Indian production.

²⁸ Spare (or excess) capacities are calculated as the difference between Indian production capacities, Indian domestic demand and Indian global exports.

²⁹ See **Annex 10**, Global, Indian and Thai SRC markets.

³⁰ See **Annex 13**, Market Research – Indian Steel Wire Rope Market, page 5.

in 2016.³¹ The new facility increased the group’s overall capacity by 66,000 MT, to around 75,000 MT.³² In 2024, BWR added equipment which will improve the utilisation of existing capacities. The company is also planning to expand capacities,³³ despite the fact that it is currently running at merely 60% capacity utilisation.³⁴ The Government of India (“GOI”) supports increases to local SRC production capacity through *inter alia* investment incentives and subsidy programs.³⁵

28. Given the already significant overcapacities, the capacity increases of the Indian industry have no justification based on (an increase in) domestic demand. Rather, they were made to target export markets, in particular the EU.³⁶ Approximately 25% of Indian SRC production is exported.³⁷
29. For most Indian producers, such as Usha Martin and Bansal, the EU is their main export destination.³⁸ Indeed, Usha Martin generates 51% of their revenues from international sales³⁹ and one of their main export destinations is Europe.⁴⁰ BWR sells close to 80% of its products to over 55 countries worldwide.⁴¹
30. This is also confirmed by Indian export statistics, as shown in Table 1.

Table 1 – India’s global SRC exports (volume in MT)

Partner	2022	2023	2024	IP
EU	26,524	25,450	24,791	28,992
United Arab Emirates	7,976	11,061	10,748	12,737
United States	7,753	5,857	5,645	9,125
Singapore	6,587	7,196	7,655	5,683
Nepal	4,937	4,390	1,736	2,148
United Kingdom	2,840	3,596	3,049	2,148
Saudi Arabia	175	1,140	2,930	1,588
Australia	1,121	1,161	945	1,061
China	1,920	1,118	1,238	630
Mexico	673	744	1,231	501
World	70,234	71,141	68,279	72,764

Source: **Annex 12**, Indian export statistics

³¹ See **Annex 14**, Information about Bharat (expansion Chalisgon).

³² See **Annex 14**, Information about Bharat (capacity).

³³ See **Annex 14**, Information about Bharat (Transcript Earnings Call FY24), page 17.

³⁴ See **Annex 14**, Information about Bharat (Transcript Earnings Call FY24), page 4.

³⁵ See **Annex 13**, Market Research – Indian Steel Wire Rope Market, pages 3-4; **Annex 14**, BWR Earnings call transcript, pages 8-10.

³⁶ See also **Annex 11**, Maia Research report (TH, IN), pages 43-51. See also **Annex 13**, Market Research – Indian Steel Wire Rope Market, page 6.

³⁷ See **Annex 13**, Market Research – Indian Steel Wire Rope Market, page 7.

³⁸ See **Annex 14**, Information about Usha Martin (presentation), page 6. See also **Annex 14**, Information about Bansal (website), page 2.

³⁹ See **Annex 15** Information about Usha Martin (global presence).

⁴⁰ See **Annex 15**, Information about Usha Siam (website), page 6.

⁴¹ See **Annex 14**, Information about Bharat (Transcript Earnings Call FY24), pages 11, 22 and 24.

31. The EU market was by far the primary export destination for Indian SRC producers during the period under consideration. The strong penetration of the EU market began essentially in 2022. In 2019, EU exports from India were merely 15,000 MT.⁴² In 2022, exports started to increase sharply to over 26,500 MT and peaked at almost 29,000 MT in the IP. This was an increase of 91% compared to 2019 pre-COVID volumes and by 9% compared to 2022. In the IP, 40% of all Indian SRC exports were made to the EU market.⁴³ Other large export markets for Indian exporting producers include the United Arab Emirates (“UAE”), the US and Singapore.
32. As shown in Table 2, FOB export prices to the EU were among the lowest of all major export destinations, and below the average Indian export price throughout the entire period under consideration. Also FOB sales prices to EU customers have decreased significantly, nearly 14%, since 2022.

Table 2 – India’s global SRC exports (FOB price in €/MT)

Partner	2022	2023	2024	IP
EU27	1,745	1,626	1,456	1,508
United Arab Emirates	1,771	1,645	1,540	1,442
United States	2,006	2,568	1,965	1,937
Singapore	1,798	1,959	1,649	1,639
Nepal	1,484	1,825	2,123	1,892
United Kingdom	2,089	2,323	2,070	1,695
Saudi Arabia	2,601	2,013	1,619	1,717
Australia	2,481	2,310	2,126	2,177
China	1,972	2,813	2,859	1,849
Mexico	1,846	1,629	1,490	1,401
World	1,834	1,867	1,691	1,647

Source: **Annex 12**, Indian export statistics

5.3. Thai SRC market

33. There are two known SRC producers in Thailand, Usha Siam Steel Industries PLC (“Usha Siam”) and Taymax Wire Rope Industry Corp. Co., Ltd. (“Taymax”).⁴⁴ Usha Siam is Thailand’s leading SRC manufacturer with headquarters in Bangkok, two factories in Pathumthani, and a global sales network.⁴⁵ Usha Siam is a subsidiary owned over 95% by Usha Martin, the largest Indian SRC producer.⁴⁶
34. To the Complainant’s best knowledge, the Thai SRC industry is active in essentially all (main) market segments, providing both general-purpose and special-purpose SRC to several industries, including construction and engineering, oil and gas, mining and shipping.⁴⁷

⁴² See **Annex 12**, Indian export statistics.

⁴³ See **Annex 12**, Indian export statistics.

⁴⁴ See **Annex 4**, List of known exporting producers. See also **Annex 11**, Maia Research report (TH, IN) / (TH, TU), pages 38-40.

⁴⁵ See **Annex 15**, Information about Usha Siam (website), pages 5-6.

⁴⁶ See **Annex 15**, Information about Usha Martin (subsidiaries). See also Section 5.2.

⁴⁷ See **Annex 7**, Brochure Usha Siam Thailand, page 4, **Annex 15**, Information about Usha Siam (website).

35. In the IP, domestic production capacities in Thailand were approximately 60,000 MT and consumption was approximately 57,000 MT.⁴⁸ While there do not appear to be major overcapacities in Thailand, the domestic producers appear to be heavily export-oriented,⁴⁹ leaving the supply of the domestic market to imports.⁵⁰ Indeed, domestic production in Thailand in the IP was approximately 37,000 MT, of which almost half (approximately 18,500 MT) was exported to the EU.⁵¹

5.4. Turkish SRC market

36. There are at least six Turkish SRC producers:  elik Halat Ve Tel Sanayi A.S. (  elik Halat ), Has Celik Ve Halat San. Tic. A.S. (  as Celik ), Koskerler Celik Halat Ve Mak. San. Tic. A.S. (  oskerler ), Cokysar Tel (  okysar ), Erciyes  elik Halat (  erciyes ) and  ahinler  elik Halat A. . (  ahinler ).⁵²
37. Domestic production capacities in T rkiye were approximately 125,000 MT in the IP.⁵³ Domestic demand was approximately 45,000 MT, and total exports were around 35,000 MT.⁵⁴ Turkish overcapacities⁵⁵ and spare capacities⁵⁶ of approximately 80,000 MT and 45,000 MT represent 47% and 27% respectively of EU demand in the IP (168,000 MT).⁵⁷ Turkish exporting producer Cokyasar has increased its production capacity in 2022 by opening a second factory and doubled its galvanising capacities in 2026 Q1.⁵⁸
38. Many Turkish exporters are strongly export-oriented and target the EU as their main export market. Several Turkish producers such as Celik Halat⁵⁹ and Hascelik⁶⁰ export to all EU Member States and have sales entities in the EU focussing on sales and marketing its products on the EU market.⁶¹
39. This is also confirmed by Turkish export statistics, as shown in Table 3.

⁴⁸ See **Annex 11**, Maia Research report (TH, IN) / (TH, TU), pages 36-38.

⁴⁹ See **Annex 15**, Information about Taymax (website).

⁵⁰ The Thai nomenclature does not have customs codes covering exclusively the product concerned. The Complainant is therefore unable to provide specific information about the import/export volumes of SRC to/from Thailand.

⁵¹ See **Annex 17**, Eurostat import data, **Annex 18**, Article 14(6) import data.

⁵² See **Annex 4**, List of known exporting producers.

⁵³ See **Annex 11**, Maia Research report (TH, TU), page 41.

⁵⁴ See **Annex 11**, Maia Research report (TH, TU), page 43, **Annex 12**, Turkish export statistics.

⁵⁵ Overcapacities are calculated as the difference between Indian production capacities and Indian domestic demand. We assume that Indian demand is supplied essentially exclusively by Indian production.

⁵⁶ Spare (or excess) capacities are calculated as the difference between Indian production capacities, Indian domestic demand and Indian global exports.

⁵⁷ See **Annex 10**, Global, Indian and Thai SRC markets.

⁵⁸ See **Annex 16**, Information about Cokyasar (capacity increase), **Annex 16**, Information about Cokyasar (galvanizing investment).

⁵⁹ See **Annex 16**, Information about Celik Halat (website) (1), page 2, **Annex 16**, Information about Celik Halat (website) (2), pages 2-3, **Annex 16**, Information about Celik Halat (AR 2025 Q1), page 6.

⁶⁰ See **Annex 16**, Information about Hascelik (website) (1), **Annex 16**, Information about Hascelik (website) (2).

⁶¹ See **Annex 16**, Information about Celik Halat (website) (1), **Annex 16**, Information about Celik Halat (website) (2), **Annex 16**, Information about Celik Halat (AR 2025 Q1), page 6.

Table 3 – T rkiye’s global SRC exports (volume in MT)

Partner	2022	2023	2024	IP
EU27	25,520	16,035	22,026	24,154
United States	4,251	1,700	2,670	3,434
Egypt	471	1,078	1,207	1,190
United Kingdom	1,123	669	602	709
Canada	938	481	387	603
World	36,848	24,545	31,506	34,934

Source: **Annex 12**, Turkish export statistics

40. The EU market was by far the primary export destination for Turkish SRC producers during the period under consideration. EU imports from T rkiye decreased in 2023 from exceptionally high volumes in 2022. In 2024, import volumes rebounded and they again reached 2022 levels in the IP. Over the period under consideration, 65-70% of all Turkish SRC exports were consistently destined for the EU market.⁶² Other export markets for Indian exporting producers include the US and Egypt, and are significantly smaller than the EU.
41. As shown in Table 4, the EU is an attractive destination for export sales, with the highest FOB export prices of the 5 biggest export destinations in terms of volume. Also FOB sales prices to EU customers have decreased significantly since 2022, from approximately €1,950 in 2022 to approximately €1,650/MT in the IP.

Table 4 – T rkiye’s global SRC exports (FOB price in €/MT)

Partner	2022	2023	2024	IP
EU27	1,943	2,027	1,683	1,658
United States	2,062	1,862	1,449	1,448
Egypt	1,970	1,698	1,492	1,282
United Kingdom	1,732	1,808	1,722	1,647
Canada	2,235	2,052	1,722	1,549
World	1,995	2,056	1,707	1,666

Source: **Annex 12**, Turkish export statistics

6. Dumping

6.1. India

42. The Complainant established dumping in accordance with Article 2(11) of the Basic Regulation by comparing the normal value (“NV”) with the export price to the first independent customer in the EU.
43. To establish the NV, the Complainant made best efforts to collect prices of domestic SRC sales of the Indian industry (**Annex 20**). In addition, and to ensure that the collected prices were representative, the Complainant also constructed the NV based on publicly available information on the SRC production costs in India.
44. For that purpose, the Complainant based the prices of raw materials and input materials on national import statistics published by the Indian Department of Commerce. Electricity prices

⁶² See **Annex 12**, Indian export statistics.

were established based on information for businesses from Global Petrol Prices. Labour costs were established based on publicly available data on average wages published by World Salaries. Sales, general and administrative (“SG&A”) costs and profits were based on information obtained from financial statements of a domestic Indian SRC producer. The calculations, together with all sources and a detailed description of the methodology used to construct the normal value, the sources of all costs, and detailed calculations are grouped together in **Annex 21**.

45. The Indian SRC EU export prices were based on (i) Eurostat import prices (**Annex 17**), (ii) Article 14(6) import data (**Annex 18**), (iii) export prices published by the Indian Ministry of Commerce and Industry (**Annex 11**)⁶³, and (iv) quotations and other price offers for the IP, which the Complainant’s members obtained via market intelligence (**Annex 19**).
46. The dumping calculations were made by comparing the Indian (constructed) NV with export prices to the EU and show above *de minimis* dumping margins of up to 134%. The detailed calculations are set out in **Annex 24**.

6.2. Thailand

47. The Complainant established dumping in accordance with Article 2(11) of the Basic Regulation by comparing the NV with the export price to the first independent customer in the EU.
48. To establish the NV, the Complainant made best efforts to collect prices of domestic SRC sales of the Thai industry (**Annex 20**). In addition, and to ensure that the collected prices were representative, the Complainant also constructed the NV based on publicly available information on the SRC production costs in Thailand.
49. For that purpose, the Complainant based prices of raw materials and input materials on national import statistics published by Thai Customs. Electricity prices were established based on information for businesses from Global Petrol Prices. Labour costs were established based on publicly available data on average wages published by World Salaries. SG&A costs and profits were based on information obtained from financial statements of a domestic producer in Thailand. The calculations, together with all sources and a detailed description of the methodology used to construct the normal value, and the sources of all costs, are grouped together in **Annex 21**.
50. The Thai SRC EU export prices were based on (i) Eurostat import prices (**Annex 17**) and (ii) Article 14(6) import data (**Annex 18**), and (iii) quotations and other price offers for the IP, which the Complainant obtained via market intelligence (**Annex 19**).
51. The dumping calculations were made by comparing the Thai (constructed) NV with export prices to the EU and show above *de minimis* dumping margins of up to 102%. The detailed calculations are set out in **Annex 24**.

⁶³ Prices of exports of SRC from India into the EU reported by India under customs codes 7312 1010 (“Wire Ropes, Black”), 7312 1020 (“Wire Ropes, Galvanised”), 7312 1030 (“Stranded Wire”) and 7312 1090 (“Others, e.g. transmission belting”).

6.3. T rkiye

52. The Complainant established dumping in accordance with Article 2(11) of the Basic Regulation by comparing the NV with the export price to the first independent customer in the EU.
53. Based on the most recent available information, the majority of the known Turkish producers are loss-making.⁶⁴ Therefore, the Complainant did not rely on domestic prices for the purpose of the dumping calculations, but instead constructed the NV based on publicly available information on the SRC production costs in T rkiye.
54. For that purpose, the Complainant based prices of raw materials and input materials on national import statistics published by Turkstat. Electricity prices were established based on information for businesses from Eurostat. Labour costs were established based on publicly available data on average wages published by World Salaries. SG&A costs were based on information obtained from financial statements of a domestic producer in T rkiye. As that producer was not profitable, the Complainant used the lowest profitability from the other subject countries, i.e. Thailand. The calculations, together with all sources and a detailed description of the methodology used to construct the normal value, and the sources of all costs, are grouped together in **Annex 21**.
55. The Turkish SRC EU export prices were based on (i) Eurostat import prices (**Annex 17**), (ii) Article 14(6) import data (**Annex 18**) and (iii) Turkstat export prices (**Annex 12**).
56. The dumping calculations were made by comparing the Thai (constructed) NV with export prices to the EU and show above *de minimis* dumping margins of up to 82%. The detailed calculations are set out in **Annex 24**.

7. Material injury

7.1. Introduction

57. The EU SRC market is attractive for third country exporters due to its size and variety of downstream industries.⁶⁵ It has one of the largest industries for SRC and future growth potential. The EU market is home to a wide range of SRC user industries, including fishing, maritime, shipbuilding, oil and gas, mining, forestry, aerial transport, automotive, civil engineering, construction and elevators. In addition, it is more attractive for large conglomerates like Usha Martin / Usha Siam to increase exports to a single market than to several smaller markets, given that selling to large customers in the same region can reduce shipping, logistics and organisational costs, and can also ensure a certain level of capacity utilisation of SRC plant.⁶⁶
58. The EU SRC producers are not opposed to healthy and fair competition from third country producers. However, over the last 25 years, third country SRC producers have repeatedly assaulted the EU market with dumped exports. For several years, the EU had therefore imposed and maintained AD and AC measures on SRC imports from more than 10 countries, including the countries subject to this Complaint.⁶⁷ In 2007 and 2010, the EU terminated the AD measures

⁶⁴ See **Annex 16**, Information about Celik Halat (Steelorbis), **Annex 16**, Information about Cokyasar (EMIS), **Annex 16**, Information about Erciyes (EMIS), **Annex 16**, Information about Has Celik (EMIS).

⁶⁵ See further Section 7.2.

⁶⁶ See Regulation 2024/1666, recitals 202-204.

⁶⁷ See paragraph 3.

imposed on imports from India, Thailand, and T rkiye, based on the finding that the exporting producers had (temporarily) ceased their unfair market behaviour. Currently, the EU maintains AD measures against imports from China, as extended to imports consigned from Morocco and South Korea.⁶⁸

59. After the termination of the AD measures on imports of SRC from India, Thailand and T rkiye, imports from those countries re-increased somewhat, but overall remained stable at (mostly) low volumes. Between 2019 and 2021, import volume were on average 38,000 MT/year.⁶⁹ However, in 2022, imports from those countries surged to more than 52,000 MT.⁷⁰ Already during the COVID lockdowns in 2020 and 2021, Indian, Thai and Turkish producers managed to maintain a rather strong presence on the EU market (approximately 24%) despite global trade restrictions.⁷¹ In 2022, when the lockdown measures had mostly been removed (except for China), imports from the subject countries (and other sources) aggressively penetrated the EU market (reaching 30% market share), as downstream industries needed to source SRC not only for actual use in their downstream activities, but also to re-fill depleted stocks.
60. Subsequently, the war in Ukraine, and rising energy prices led to a drop in demand and an economic slowdown in the EU and globally. In this difficult economic situation, imports from the subject countries maintained and increased their (absolute and relative) presence on the EU market by systematically lowering their prices. Moreover, the exporting producers from the subject countries widened their product offering and started to compete at unfair prices in all market segments, from general purpose ropes to specialty ropes for e.g. elevators, industrial and maritime applications.
61. With this aggressive and unfair market behaviour, imports from the subject countries took significant market share from the EU industry, and started to cause material injury to EU producers, as confirmed by the Commission's findings in the last expiry review of the AD measures on imports from China.⁷² The injury reached the point that in 2024 the EU industry had already become loss-making.⁷³ By the IP, imports from the subject countries had more than 1/3 of the EU market.⁷⁴
62. This unfair competition poses an existential threat to the survival of the EU SRC industry. The Complainant therefore asks the Commission, in line with the 2025 EU's Metals and Steel Action Plan,⁷⁵ to impose AD measures on SRC imports from the subject countries to restore a level playing field on the EU market.

7.2. Consumption and market shares

63. Table 5 shows the consumption of SRC in the EU over the period under consideration. The EU industry's sales comprise the sales of producers supporting this Complaint and sales made by

⁶⁸ See Regulation 2024/1666.

⁶⁹ See **Annex 17**, Eurostat import data and **Annex 27**, EU consumption, for the development of import volumes and market shares between 2019 and 2021.

⁷⁰ See **Annex 17**, Eurostat import data.

⁷¹ See **Annex 27**, EU consumption.

⁷² See Regulation 2024/1666, recital 194.

⁷³ See further section 7.4.

⁷⁴ See **Annex 27**, EU consumption.

⁷⁵ See **Annex 22**, Metals and Steel Action Plan, page 11.

other known EU producers. For the non-supporters, the Complainant provides best estimates based on market intelligence.⁷⁶ The Complaint therefore covers 100% of (known) EU27 SRC production. Import volumes are based on import data at TARIC level which the Complainant obtained from the Commission through a request under Article 14(6) of the Basic Regulation.

64. Because of the exceptional market situation caused by COVID measures worldwide, as described in paragraph 59, it is necessary and appropriate to consider EU market developments since 2019 (rather than looking only at the last three years).⁷⁷

Table 5 – EU SRC demand (volume in MT)

EU demand (MT)	2022	2023	2024	IP
Total sales of the EU industry	78,603	74,441	65,616	69,594
Imports from the subject countries	52,623	40,589	52,591	57,373
Imports from India	20,975	18,920	19,695	23,918
Imports from Thailand	12,559	10,355	15,517	14,869
Imports from T�rkiye	19,089	11,313	17,379	18,586
Other imports	61,985	52,087	55,756	58,124
Apparent consumption	174,122	155,803	156,584	166,505

Source: **Annex 27**, EU consumption

65. EU SRC consumption in 2022 was exceptionally high due to increased activities in user industries post-COVID, and the fact that customers wanted to rebuild their inventories which had been depleted due to the supply chain disruptions in 2020 and 2021.⁷⁸ Subsequently, in 2023 and 2024, demand dropped back to pre-COVID levels.⁷⁹ In the IP, demand increased somewhat to around 166,000 MT.
66. EU sales of the EU industry decreased by more than 4,000 MT between 2022 and 2023 in line with the overall drop in demand. In 2023 and 2024, EU sales of the EU industry continued to decrease further, by another 9,000 MT, despite stabilising demand. In the IP, the EU industry had increased sales but not to the same extent as the rebound in demand between 2024 and the IP. The result was a further drop in market share. The negative trends were clearly caused by the increasing and predatorily priced imports from the subject countries.
67. Indeed, between 2022 and 2023, imports from the subject countries decreased from 52,000 MT to 40,000 MT, which was only slightly higher than the average imports volumes of approximately 38,000 MT/year in the period 2019-2021. In 2024, imports re-increased to 2022 levels and continued increasing in the IP. Overall, imports from the subject countries increased by 9% between 2022 and the IP.
68. Imports from other countries decreased by 6% between 2022 and the IP. Looking at the evolution since 2019,⁸⁰ third country imports decreased slightly (by 2%) from approximately 59,000 MT to 58,000 MT.

⁷⁶ See **Annex 26**, Capacities of EU SRC producers.

⁷⁷ Table 5 and Table 6 include EU consumption and market shares for the period under consideration. An overview of consumption from 2019 to the IP is contained in **Annex 27**.

⁷⁸ See Section 7.1.

⁷⁹ See **Annex 27**, EU consumption.

⁸⁰ See **Annex 27**, EU consumption.

69. Table 6 shows how imports from the subject countries took market share from the EU industry during the period under consideration.

Table 6 – EU market shares

EU demand (%)	2022	2023	2024	IP
Total sales of the EU industry	45.1%	47.8%	41.9%	41.8%
Imports from the subject countries	30.2%	26.1%	33.6%	34.5%
Imports from India	12.0%	12.1%	12.6%	14.4%
Imports from Thailand	7.2%	6.6%	9.9%	8.9%
Imports from T�rkiye	11.0%	7.3%	11.1%	11.2%
Other imports	35.6%	33.4%	35.6%	34.9%

Source: **Annex 27**, EU consumption

70. Between 2019 and 2021, the EU industry had approximately 50% of the EU market.⁸¹ In 2022, the EU industry's market share dropped to 45%, as imports, including those from the subject countries, increased significantly.⁸² In 2023, the EU industry was able to regain some market share, but that gain was quickly wiped out in 2024 as exporting producers in the subject countries aggressively undercut EU producer prices (explained below).
71. Overall, between 2023 and the IP, the exporting producers from the subject countries increased their EU market share by more than 8 percentage points in three years. This increase was at the expense of the EU industry, whose market share continued dropping to just below 42% in the IP.
72. In sum, given the rather stable market share of third country imports, it is clear that the increase in imports from the subject countries injured the EU industry and not other imports. Due to the pressure of the imports from the subject countries in the IP, the EU industry was unable to maintain market share in line with the increase in demand.

7.3. Indian, Thai and Turkish import prices and price undercutting and underselling

73. During the period under consideration, producers from the subject countries sold SRC to the EU at extremely low prices that suppressed and depressed prices on the EU market.
74. This is seen clearly from a comparison of the import prices in Eurostat (**Annex 17**) with the average prices of the EU industry (**Annex 29**). Table 8 compares Indian, Thai, Turkish and EU prices of SRC on the EU market during the four quarters of the IP.

⁸¹ See **Annex 27**, EU consumption.

⁸² See paragraph 59.

Table 7 – Indian, Thai, Turkish and EU prices of SRC

Exporter vs EU industry prices (�/MT)		2025 Q1	2025 Q2	2025 Q3	2025 Q4
India	Eurostat CIF	1,564	1,574	1,507	1,515
	Art. 14(6) CIF	1,534	1,560	1,503	1,505
	Export data FOB	1,452	1,529	1,402	1,438
	Price quotes CIF	2,393	1,590	NA	1,927
Thailand	Eurostat CIF	1,517	1,630	1,424	1,628
	Art. 14(6) CIF	1,461	1,557	1,587	1,591
	Price quotes CIF	1,897	NA	NA	1,906
T�rkiye	Eurostat CIF	1,802	1,741	1,720	1,723
	Art. 14(6) CIF	1,752	1,662	1,704	1,688
	Export data FOB	1,675	1,670	1,625	1,638
EU industry	Performance data	4,922	4,510	4,696	4,941
	Sample invoices EXW	5,404	5,601	5,826	5,879

Source: **Annex 17**, Eurostat import data, **Annex 18**, Art. 14(6) import data, **Annex 12**, Indian export statistics, **Annex 19**, Price quotes, **Annex 29**, EU industry performance indicators, **Annex 30**, EU industry sample invoices

75. The undercutting⁸³ and underselling⁸⁴ calculations compare the EU industry’s ex-works (“EXW”) domestic sales prices and target prices respectively, with the respective Indian and Thai export prices at landed level.
76. Indian and Thai EU export prices of SRC have been established based on Eurostat import data (**Annex 17**), Article 14(6) import data (**Annex 18**), export data⁸⁵ (**Annex 12**) and price quotes from exporting producers (**Annex 19**). EU prices have been established based on average EU sales prices reported in the performance data tables of the companies supporting the Complaint (**Annex 29**) and their sample invoices to EU customers (**Annex 30**). The target price is based on the EU industry’s cost of production plus a very conservative target profit of 6%, which is the minimum target profit established by Article 7(2c) of the Basic Regulation.
77. Calculations with quarterly breakdowns for the IP are attached as **Annex 32**, and show undercutting and underselling margins of up to 73% and 243% for India, up to 72% and 238% for Thailand, and up to 70% and 207% for T rkiye. In addition, the Complainant also provides undercutting calculations for various product groups and types (diameter, general purpose ropes and certain constructions). The calculations show that the Indian, Thai and Turkish prices undercut the EU industry prices not only on an aggregate basis, but also for each product group and type.

7.4. Performance of the EU industry

78. Table 8 shows the performance of the EU industry during the period under consideration. Capacities, production, capacity utilisation, EU and export sales volumes, and employment are

⁸³ Undercutting calculations compare the Chinese price on the EU market with the EU sales price of the EU industry.

⁸⁴ Underselling calculations compare the Chinese EU price on the EU market with the price the EU industry should be able to generate in the absence of dumped imports.

⁸⁵ As discussed above, the Complainant did not rely on export statistics for Thailand.

macro data, covering 100% of the known EU producers.⁸⁶ The remaining micro indicators are based on the data of the companies supporting this Complaint.

Table 8 – EU industry performance indicators

Performance indicator	2022	2023	2024	IP
Capacity (MT)	222,938	223,203	210,021	210,513
Production (MT)	136,568	131,388	114,729	124,887
Utilisation rate (%)	61%	59%	55%	59%
EU sales (MT)	78,603	74,441	65,616	69,594
EU sales prices unrel (�/MT)	4,831	5,160	5,017	4,756
Export sales (MT)	70,627	72,721	63,644	71,126
Export sales prices unrel (�/MT)	4,688	4,953	4,600	4,719
Cost of production (�/MT)	4,632	5,118	5,055	4,942
Profitability (%)	4.1%	0.8%	-0.8%	-3.9%
Employment (FTE)	3,120	3,133	2,981	2,877
Investments (million �)	9.6	10.1	6.6	9.1
Stocks (MT)	25,367	24,731	21,771	21,747

Source: **Annex 28**, Macro indicators, **Annex 29**, EU industry performance indicators

79. Over the period under consideration, the EU industry experienced a substantial drop in all performance indicators, which was directly related to the increase in dumped and undercutting imports of SRC from the subject countries.
80. EU production **capacities** decreased over the period under consideration. At the end of 2023, one EU producer closed its EU SRC production plant,⁸⁷ leading to a drop in production capacities in the EU. Other producers have reduced their production capacities since the last expiry review of the AD measures on imports from China.
81. **Production, capacity utilisation and EU27 sales volumes** show a downward trend between 2022 and the IP. Production volumes decreased by 9%, whereas EU sales decreased by 11%, as the EU industry was attempting to sell stocks which were at elevated levels in 2022. In the IP, production and EU27 sales re-increased slightly but remained below the levels of 2022-2023. **Export sales** remained relatively stable between 2022 and the IP, with a decrease in 2024.
82. Between 2022 and 2023, the EU SRC industry was able to increase **EU sales prices** and **export sales prices** as **production costs** (mainly energy costs) increased. However, between 2023 and the IP, the EU industry was forced to lower its prices more than its production costs decreased.
83. Accordingly, while the EU industry was **profitable** in 2022 and 2023, profitability was below the 5% target profit for this industry set out in previous investigations,⁸⁸ as well as below the minimum 6% target profit set out in Article 7(2c) of the Basic Regulation. Under the pressure of the dumped and undercutting imports from the subject countries, the EU industry has been **loss-making** since 2024.

⁸⁶ The capacities of non-cooperating EU producers are estimated based on market intelligence. The production volume of non-cooperating EU producers is calculated by multiplying the estimated capacities by the capacity utilisation of the cooperating producers. Sales, exports, and employment of non-cooperating EU producers are calculated by multiplying the production to sales / exports / employment ratios of the cooperating producers by the production volume of the non-cooperating producers. See **Annex 28**, Macro data.

⁸⁷ See **Annex 31**, Bridon-Bekaert to close wire rope plant.

⁸⁸ See Regulation 2018/607, recital 162.

84. **Employment** and **stocks** decreased over the period under consideration. **Investments** fluctuated over the period under consideration, and decreased overall by 6% between 2022 and the IP. These investments were made primarily for maintenance and repair, as well as environmental standard compliance upgrades.
85. The performance data clearly show that the EU industry has been materially injured by predatory SRC imports from the subject countries.

7.5. Conclusion

86. In sum, over the period under consideration, the EU SRC industry faced a strong increase of unfairly traded SRC imports from India, Thailand and T rkiye. With highly dumped and undercutting prices, SRC producers from the subject countries gained substantial market share at the expense of the EU SRC industry. They forced EU producers into an unsustainable loss-making position and even forced one EU producer out of the market.⁸⁹ There is therefore an urgent need for the Commission to act and impose AD duties on imports of SRC from the subject countries to level the playing field on the EU market.

8. Causation

87. As shown in Section 6.3, the EU industry's performance declined substantially at the same time as the increase in highly dumped and undercutting imports of SRC from the subject countries. As explained below, the injury of the EU industry is caused by unfair competition from these imports. There are no other factors that break that causal link.

8.1. Imports from India, Thailand and T rkiye

88. Since 2019, dumped imports of SRC from the subject countries increased in volume by 50%, from approximately 38,000 MT to 57,000 MT.⁹⁰ Prices of Indian, Thai and Turkish SRC imports have been systematically and substantially lower than the prices, and even the cost of production, of the EU industry.⁹¹ Import prices also decreased significantly over the period under consideration.⁹² This depressed and suppressed EU market prices and heavily undercut the EU SRC industry's prices.⁹³ With their aggressive behaviour, producers from the subject countries took significant market share from the EU industry.⁹⁴
89. As a result, the EU industry's performance deteriorated significantly, marked by decreasing sales/export volumes and culminating in losses in 2024, which continued in the IP.

⁸⁹ See **Annex 31**, Bridon-Bekaert to close wire rope plant.

⁹⁰ See Section 7.2, **Annex 27**, EU consumption.

⁹¹ See Section 7.3.

⁹² See **Annex 17**, Eurostat import data, **Annex 18**, Art. 14(6) import data.

⁹³ See Section 7.3, **Annex 32**, UC/US calculations.

⁹⁴ See Section 7.2, **Annex 27**, EU consumption.

8.2. Other factors

90. There were no other factors during the period under consideration that materially injured the EU SRC industry, and could therefore have broken the causal link between SRC imports from the subject countries and the material injury suffered by the EU industry.

a. Export performance of the EU industry

91. The injury suffered by the EU industry is not caused by changes in the export performance of the EU producers. The EU industry’s export sales increased slightly between 2022 and 2023, decreased subsequently by more than 10% in 2024, and returned to 2022 levels in the IP.⁹⁵ The EU industry also lost market share in third countries to unfairly competing exporting producers from *inter alia* the subject countries (and China).⁹⁶ Because of that unfair competition, the EU industry’s export prices were pushed down, especially after 2023, and the EU industry could not sell at a profit during most years.
92. In other words, producers in the subject countries (and China) have not only injured the EU industry on the EU market, but also on export markets.
93. The export performance of the EU industry is therefore not a separate factor capable of breaking the causal link between the imports from the subject countries and the material injury suffered by the EU industry. Rather it confirms how aggressively the producers in the subject countries act on global markets.

b. Imports from third countries

94. According to Eurostat and Article 14(6) data, besides the subject countries, China, Malaysia, South Korea, the UK and Vietnam have major exports of SRC to the EU.⁹⁷ Table 9 shows data regarding imports from these countries during the period under consideration.

⁹⁵ See Table 8, **Annex 29**, EU industry performance indicators.

⁹⁶ See **Annex 27**, EU consumption.

⁹⁷ See **Annex 18**, Art. 14(6) import data.

Table 9 – Imports from countries other than the subject countries

Country	Indicator	2022	2023	2024	IP
China	Volume (MT)	1,634	2,146	2,035	3,043
	Price (�/MT)	2,465	1,793	1,890	1,616
	% of imports	2%	3%	2%	3%
Malaysia	Volume (MT)	4,261	3,320	4,603	4,769
	Price (�/MT)	2,321	2,180	2,134	1,901
	% of imports	4%	4%	5%	5%
South Korea	Volume (MT)	22,037	19,857	17,784	19,281
	Price (�/MT)	2,621	2,683	2,535	2,585
	% of imports	23%	24%	20%	20%
UK	Volume (MT)	3,318	4,734	4,438	2,830
	Price (�/MT)	3,607	3,909	3,833	4,737
	% of imports	3%	6%	5%	3%
Vietnam	Volume (MT)	3,531	5,065	4,881	3,799
	Price (�/MT)	2,786	2,583	2,420	2,540
	% of imports	4%	6%	5%	4%

Source: **Annex 18**, Article 14(6) data

95. EU imports of SRC from **China** have been subject to AD duties since 1999.⁹⁸ During the last expiry review, the Commission found that in 2022 imports from China had not caused injury to the EU industry, but that there was a high likelihood that Chinese exporting producers would increase dumped SRC exports at prices undercutting the EU industry should the AD measures on SRC imports from China lapse.⁹⁹ Following those findings, Chinese producers doubled export volumes to more than 3,000 MT in the IP, while at the same time dropping CIF prices significantly from around  2,500/MT in 2022 to  1,600/MT in the IP. However, imports from China represented only around 2-3% of total EU imports in those years, and those imports were subject to a 60.4% AD duty. SRC imports from China therefore did not break the causal link between injury to the EU industry and imports from the subject countries.
96. Import volumes of SRC from **Malaysia** fluctuated over the period under consideration, with a significant drop in 2023. Import prices decreased over the period under consideration, from  2,300/MT in 2022, to  2,100/MT in 2023 and 2024, to  1,900/MT in the IP. Overall, imports from Malaysia had a share of imports of approximately 4-5% and that share remained stable over the period under consideration. Considering the low volume and stable import share, SRC imports from Malaysia cannot have broken the causal link between the injury to the EU industry and imports from the subject countries. However, the Complainant is closely monitoring imports from Malaysia and reserves the right to take additional actions should EU imports from Malaysia increase at decreased prices.
97. There are three known SRC producers in **South Korea**, Kis Wire, DSR Wire and Young Heung Iron & Steel.¹⁰⁰ In the last expiry review of the AD measures on imports from China, the Commission confirmed that the imports from South Korea were from exporting producers exempted from the AC measures.¹⁰¹ Imports from South Korea decreased between 2022 and 2024, and re-increased in the IP. Overall, South Korea's share of total imports dropped from

⁹⁸ See Regulation 1796/1999. The AD measures were last extended in 2024, see Regulation 2024/1666.

⁹⁹ See Regulation 2024/1666, recital 194.

¹⁰⁰ See **Annex 9**, List of known third country producers.

¹⁰¹ See Regulation 2024/1666, recital 155.

23% in 2021 to 20% in the IP. EU sales prices of South Korean producers decreased slightly from around €2,620/MT in 2022 to €2,580/MT in the IP. South Korea’s import prices are the highest of all non-European imports, but remain far below the prices of the EU industry. However, considering all factors together, the stagnating import volume, the loss in import and market share, the high prices and the AC measures¹⁰², it is most reasonable to conclude that imports from South Korea did not break the causal link between the EU industry’s injury and the imports from the subject countries.

98. There are two known **UK** producers, Brunton Shaw UK and Bridon-Bekaert UK. SRC imports from the UK have increased between 2022 and 2023, remained at high levels in 2024, and subsequently decreased in the IP, both in absolute terms and in terms of share of imports. The average prices of imports from the UK have increased significantly between 2024 and the IP. Considering the low and stable volumes and the high prices, SRC imports from the UK cannot have broken the causal link between injury to the EU industry and imports from the subject countries.
99. Imports from **Vietnam** were also very limited during the period under consideration. Imports increased between 2022 and 2023 from approximately 3,500 MT to 5,000 MT and decreased subsequently to around 3,800 MT in the IP. Prices remained stable at around €2,400-2,600/MT between 2023 and the IP, down from a peak of almost €2,800/MT in 2022, and have been higher than the average import prices throughout the period under consideration. Considering the low and since 2023 decreasing import volumes and the higher price levels as compared to the imports from the subject countries, SRC imports from Vietnam cannot have broken the causal link between injury to the EU industry and imports from the subject countries.
100. In sum, EU SRC imports from countries other than India, Thailand and T rkiye did not break the causal link between the injury to the EU industry and the dumped and undercutting imports from the subject countries. The Complainant is, however, carefully monitoring third-country imports and will consider further action as appropriate.

8.3. Conclusion

101. In sum, there are no factors that broke the causal link between the material injury of the EU industry and the dumped imports from India, Thailand and T rkiye.

9. Union interest

102. The imposition of AD measures on the product concerned is in the overall Union interest.
103. First, the **EU SRC industry** clearly has an interest in the imposition of AD measures to restore a level playing field on the EU market. Indeed, the imposition of AD measures would allow the EU industry to recover from the material injury caused by the dumped imports from the subject countries and prevent a further worsening of the situation of the EU industry.
104. The imposition of AD measures would also not be against the interest of any other EU parties.
105. The **upstream EU producers and suppliers** of steel and wires would benefit from the AD measures as the EU SRC industry is an important part of the value chain.

¹⁰² See Regulation 400/2010.

106. **Unrelated importers** have ample supply sources from producers inside and outside the EU. As confirmed in previous investigations of SRC imports from China, the AD measures do not negatively affect their interest.¹⁰³
107. Similarly, several **EU users** have emphasised in previous AD investigations related to SRC that they do not suffer negative consequences from the AD measures as several other supply sources are available to them. For many users, the cost of SRC is marginal in comparison to the total cost of production of their products.¹⁰⁴ EU users also benefit from the product developments by, services from and cooperation with the EU SRC industry. Therefore, the imposition of the AD measures would also not be against the interests of EU users. In any event, any inconveniences (e.g. in having to change supply sources) can certainly not outweigh the EU industry’s interest in the restoration of a level playing field on the EU market. Moreover, AD measures would not prevent users from sourcing SRC from Indian and Thai suppliers at fair and non-dumped prices.
108. In sum, the imposition of AD measures is in the overall EU interest.

10. Conclusion

109. For the reasons set out above, the Complainant respectfully requests that the Commission initiate an AD investigation pursuant to Article 5 of the Basic Regulation and conclude the investigation as swiftly as reasonably possible with the imposition of AD measures on imports of SRC from India, Thailand and T rkiye.

¹⁰³ See Regulation 2018/607, recital 173, Regulation 102/2012, recitals 129-130, Regulation 2024/1666, recital 221.

¹⁰⁴ See Regulation 2018/607, recitals 174-175, Regulation 102/2012, recitals 131-132.

Certification

The undersigned certifies that the information in this Complaint is complete and accurate, to the best of their knowledge, and that she is authorised to represent the Complainant.

The undersigned declares that she is submitting to the Commission information and/or data which is subject to third party copyrights for which she will request specific permission from the copyright holder(s) explicitly allowing the Commission (i) to use the information and data for the purpose of this trade defence proceeding and (ii) to provide the information and/or data to interested parties to this investigation. In the meantime, the undersigned provides a meaningful summary of the copyrighted information. She also declares that all the other information and data submitted for the purpose of this investigation are free from copyrights.

Sabine Wagner,

Secretary-General, EWRIS