'OPEN FOR CONSULTATION' VERSION

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ALL ATTACHMENTS ARE BY NATURE CONFIDENTIAL[1]

Rotterdam, August 22, 2022

Re: Comment of EURANIMI in relation to the submission of the Defence Committee

Dear Case Team,

On behalf of EURANIMI, we hereby comment in relation to the submission of the Defence Committee dated 27 July 2022 (t22.004408).[2]

1 PREAMBLE

1.1 It has been more than five years since Commission Implementing Regulation (EU) 2017/141 of 26 January 2017 came into force. In 2016, for reasons developed further in this document, the unrelated importers have barely participated in this investigation. Many of them, mostly stockholding distributors, have meanwhile formed and joined an association: EURANIMI. Their individual hindsight on the consequences of the EC's decision concluding this 2016-investigation, prompts them to collectively offer suggestions aiming at, on one hand, preserving the legitimate request of the Union producers to remain protected against unfair competition from abroad, while simultaneously and on the other hand, restoring the competitiveness of both the importers and the EU downstream manufacturing in the supply of fittings produced according to American standards. Such fittings produced according to American standards are intrinsically NOT European products and are in essence destined to be mounted on global-operated projects (worldwide uniformity of standards) or re-exported outside the Union.

1.2 As we shall develop further in this document, these American-standard fittings are only marginally produced/offered by the Union producers. They nevertheless represent a

[1] The attachments are provided on a confidential basis to the Commission for the purpose of the investigation and are not susceptible of public disclosure.
[2] The Power of Attorney for the legal representation of EURANIMI is included in attachment 1.

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1.2 As we shall develop further in this document, these American-standard fittings are only marginally produced/offered by the Union producers. They nevertheless represent a substantial portion of the business volume of the European stockholding distribution and their customers, the EU downstream manufacturing industry.

1.3 The difference between fittings produced according to European standards and American standards can somehow be compared to the difference between cars with the steering wheel positioned on the right or on the left hand side. Both types may have similar visual aspects, they nevertheless are destined to very different markets. Hereafter, we shall demonstrate that in the case of stainless steel butt-welding fittings, also the production process according to each standard contains significant differences.

1.4 In the context of the EC's investigation on the possible prolongation of the anti-dumping measures applicable to imports of certain stainless steel tube and pipe butt-welding fittings originating in the People's Republic of China and Taiwan, the EURANIMI-member-companies composing the working-group concerned by this investigation, designated some of their members to form a delegation to be heard by the EC-team on behalf of their group. This delegation was composed of one EU producer & distributor of stainless steel fittings and nine importing stockholding distributor. It was heard by the Commission on March 3, 2022.

The content of this hearing was summarized in a "post-hearing memo", t22.002425 dated March 21 and published on TRON on March 31 (ATTACHMENT 2). This memo had been jointly issued by several stockholding distributors AND one Union producer. Its content had therefore been carefully weighed to meet the interests of both sides: producer and importers. Since the disclosing of this memo, has not led to the publication of any contestation issued by the other Union producers, EURANIMI had taken it for granted that the balanced explanations contained in this memo were unanimously accepted.

It is therefore deeply regrettable that the reply of the Union producers t22.002425 dated April 20 was not published on TRON until July 29, 2022 (ATTACHMENT 3). Had the members of EURANIMI known in time that the Union producers are contesting the content of this memo, the members of EURANIMI could have ordered an independent study to demonstrate the reality of the stainless steel fittings market in much more detail.

Due to the unfortunate delay of the publication of the observations made by the Defence Committee of the Union producers, such technical demonstration had now to be issued in a hurry, at one of the worst thinkable periods of the year, when most of the executives concerned have no other choice but to cooperate on the issuance of this document from their holiday place.

1.5 In this document we shall:

1.5.1 Comment on the study that allegedly demonstrates the 'existence of the production' and the availability from EU sources of EN/DIN and ASME/ANSI fittings in the European Union submission of the Defence Committee dated 27 July 2022 (t22.004408, ATTACHMENT 4).

1.5.2 Comment on the statement made by the Defence Committee (t22.004408) that the Commission's assessment in Implementing Regulation (EU) 2017/141 of 26 January 2017 is 'still relevant' for the current expiry review.

1.5.3 Explain the main technical differences between American (ASTM) and European (EN) fittings.

1.5.4 Comment the observations made by the Defence Committee related to the importers' input

2 COMMENT ON THE "DEFCOM STUDY" (t22.004408)

The members of EURANIMI wish to make a few observations on the "Study EU BWF ANSI availability" issued by the Defence Committee and that should demonstrate the availability of all types (elbows, tees, reducers, and caps?) in size-range, quality, and quantity of ANSI butt-welding fittings.

2.1 Why are ASME/ANSI end caps not included in the competitors' landscape?

We understand that the applicants acknowledge that these types of fittings are not produced in the EU, as corroborated by the recent declining of offers our members received from OSTP, Erne Fittings and Rohrbogen.

2.2 Why are the names of all the EU producers concerned by this study not shared with other interested parties?

In our view, sharing the names of these companies would not have caused them prejudice. On the contrary, should these companies truly be able to produce ASME/ANSI fittings as is being claimed by this study, it would have been helpful to importers, such as our members, to identify those few Union producers as potential suppliers.

2.3 It is utterly impossible for EURANIMI's members to review the competitors' landscape BWF Europe without an open version showing standards and size range.

Based on our attachments 5,6 and 7 mentioned further in this letter and containing offers issued by the applicants to EURANIMI's members, we are seriously questioning the ability and the willingness of the Union producers to supply in practice a sufficiently wide range of ASME/ANSI fittings.

2.4 The Union importers have the impression that the prices quoted by the Union producers for ASTM/ANSI fittings, do not represent a viable economic operation, because the Union producers are focussed on manufacturing EN/DIN-fittings and do generally not manufacture ASTM/ANSI fittings.

3 COMMENTS ON TODAY's RELEVANCE OF THE COMMISSION'S FINDINGS OF 2017 (t22.004408)

We comment on the statement of the Defence Committee that Commission's assessment in Implementing Regulation (EU) 2017/141 of 26 January 2017 is 'still relevant' for the current expiry review. In our opinion, some conclusions expressed in the assessment of 2017 need context or are simply false.

3.1 Commission Implementing Regulation (EU) 2017/141 of 26 January 2017 shows that at the time of the initial investigation, very summary exchanges have taken place on the subject of the difference - regarding both the products themselves AND their market - of stainless steel butt welding fittings produced according to different standards EN/DIN vs ASME/ANSI.
This very short chapter was concluded in recital 60 with "***In absence of any further comments*** *regarding the product standards, the claim that product concerned and like product should have been separately analysed based on ASME/ANSI and EN/DIN standard was rejected.*"

Recital 18 indeed clarifies that at the time, in 2017, long before the founding of EURANIMI, only 3 unrelated importers participated in the general investigation, while recital 57 specifies that only ONE of them made observations regarding this issue, but refrained from elaborating further on this matter: "*The Commission also notes that despite specific requests made to the cooperating importer, the Commission did not receive any evidence demonstrating that the like product and the product concerned are not in competition.*"

3.2 The above clearly shows that an in-depth discussion on the distinction between both standards never took place and, due to lack of participation of sufficient unrelated importers, such debate never could have taken place.

4 UNABILITY/UNWILLINGNESS OF UNION INDUSTRY TO OFFER INQUIRED ASTM-MATERIAL

4.1 Based on some offers made by OSTP, Erne Fittings and Rohrbogen disclosed in attachments (5,6 and 7) , it becomes clear that, in contrast to what the Defence Committee states, only a relatively small portion of the inquired ASTM/ANSI fittings are in practice made available to the EU market by the Union producers.

4.2 In attachment 5 Company A shares with the Commission their inquiries for ASTM/ANSI fittings and the offers they received from OSTP, Erne Fittings and Rohrbogen.

4.3 In attachment 6 Company B shares with the Commission inquires and offers from OSTP and Erne Fittings.

4.4 In attachment 7 Company C shares with the Commission a request of ASTM/ANSI fittings and the offer they received from OSTP.

5 MAIN TECHNICAL DIFFERENCES BETWEEN AMERICAN AND EUROPEAN STANDARDS (t22.004408)

5.1 EXPLANATION OF THE DIFFERENT STANDARD AND JARGON

- ASTM A403 is the norm, the standard for the butt weld fittings (chemical / mechanical values and production values); base material according ASTM A312 on which they control the values according A403.
- ASME B16.9 norm for sizes and tolerances.
- The EN norms are as follow:
  - EN 10253-3/4 is the norm for the European butt-weld fittings (chemical / mechanical values); Base material welded according EN10217-7 and seamless according EN10216-5.
  - ISO 1127 is the norm for the European tolerances.
  - EN grades are indicated as 1.4307 and 1.4404 (this is originated from the old German "Werkstoff" numbers)
- Like in the Taric code is mentioned "equivalent" of the AISI (...) so in general this means e.g. 304L / 1.4307 is "equivalent" but does not mean it's exactly the same. AISI = American Iron and Steel Institute is mentioned in the current Tariff code. ANSI is "jargon" for all inch size products. AISI is a general norm, when we talk about grades like 304L and 316L they are mentioned like AISI 304L and AISI 316L. ANSI is used in industry jargon for fittings with an inch designation, seamless or welded. This discussion concerns the differences between the ASTM A403 (American) and EN10253-3/4 (European) standard.

5.2 FITTINGS ACCORDING ASTM A403 REQUIRE A HEAT TREATMENT AND ACCORDING EN10253-4 DO NOT REQUIRE HEAT TREATMENT.

Fittings according to EN 10253-4 do not need a heat treatment and fittings according to A403/A403M do need a heat treatment, so this means that the producer for A403 need to have a furnace to carry out these heat treatments.

Because this is a very expensive part in the production the EU producers are not going to carry out this step because the EU fitting norm does not require this step.

This is a significant difference because annealing the fittings you can guarantee that all the Chrome-carbides are going into solution (please see phrase out of the norm on the next page).

treatments. The heat-treat procedure, except for those grades listed in 6.2, shall consist of solution annealing the fittings at the temperatures listed for each grade in Table 4 until the chromium carbides go into solution, and then cooling at a sufficient rate to prevent reprecipitation.

6.2 A solution annealing temperature above 1950 °F [1065 °C] may impair the resistance to intergranular corrosion after subsequent exposure to sensitizing conditions in 321, 321H, 347, and 347H. When specified by the purchaser a lower temperature stabilizing treatment or a second solution anneal shall be used subsequent to the initial high-temperature solution anneal (see Supplementary Requirement S2).

6.3 All welding shall be done prior to heat treatment.

6.4 Fittings machined directly from solution-annealed forgings and bar stock need not be annealed again.

7. Chemical Composition

7.1 The chemical composition of each cast or heat used shall be determined and shall conform to the requirements of

TABLE 4 Heat Treatment

Grade WP[A]	Grade CR[A]	UNS Designation	Solution Anneal Temperature, min °F [°C][B]	Quench Media
WPXM-19	CRXM-19	S20910	1900 [1040]	water or other rapid cool
WP20CB	CR20CB	N08020	1700–1850 [927–1010]	water or other rapid cool
WP6XN	CR6XN	N08367	2025 [1107]	water or other rapid cool
WP700	CR700	N08700	2025–2100 [1107–1150]	water or other rapid cool
WPNIC	CRNIC	N08800	1800–1900 [983–1038][C]	water or other rapid cool
WPNIC10	CRNIC10	N08810	2100–2150 [1147–1177][C]	water or other rapid cool
WPNIC11	CRNIC11	N08811	2100–2150 [1147–1177][C]	water or other rapid cool
WP904L	CR904L	N08904	1985–2100 [1085–1150]	water or other rapid cool
WP1925	CR1925	N08925	1800–1900 [983–1038]	water or other rapid cool
WP1925N	CR1925N	N08926	2150 [1177]	water or other rapid cool
WP304	CR304	S30400	1900 [1040]	water or other rapid cool
WP304L	CR304L	S30403	1900 [1040]	water or other rapid cool
WP304H	CR304H	S30409	1900 [1040]	water or other rapid cool
WP304N	CR304N	S30451	1900 [1040]	water or other rapid cool
WP304LN	CR304LN	S30453	1900 [1040]	water or other rapid cool
WP309	CR309	S30900	1900 [1040]	water or other rapid cool
WP310S	CR310S	S31008	1900 [1040]	water or other rapid cool
WP310H	CR310H	S31009	1900 [1040]	water or other rapid cool
WPS31254	CR31254	S31254	2100 [1150]	water or other rapid cool
WPS31266	CRS31266	S31266	2100 [1150]	water or other rapid cool
WP316	CR316	S31600	1900 [1040]	water or other rapid cool
WP316L	CR316L	S31603	1900 [1040]	water or other rapid cool
WP316H	CR316H	S31609	1900 [1040]	water or other rapid cool
WP316N	CR316N	S31651	1900 [1040]	water or other rapid cool
WP316LN	CR316LN	S31653	1900 [1040]	water or other rapid cool
WP317	CR317	S31700	1900 [1040]	water or other rapid cool
WP317L	CR317L	S31703	1900 [1040]	water or other rapid cool
WPS31725	CRS31725	S31725	1900 [1040]	water or other rapid cool
WPS31726	CRS31726	S31726	1900 [1040]	water or other rapid cool
WPS31727	CRS31727	S31727	1975–2155 [1080–1180]	water or other rapid cool
WPS31730	CRS31730	S31730	1900 [1040]	water or other rapid cool
WPS32053	CRS32053	S32053	1975–2155 [1080–1180]	water or other rapid cool
WP321	CR321	S32100	1900 [1040]	water or other rapid cool
WP321H	CR321H	S32109	1925 [1050]	water or other rapid cool
WPS33228	CRS33228	S33228	2050–2160 [1120–1180]	water or other rapid cool
WPS34565	CRS34565	S34565	2050–2140 [1120–1170]	water or other rapid cool
WP347	CR347	S34700	1900 [1040]	water or other rapid cool
WP347H	CR347H	S34709	1925 [1050]	water or other rapid cool
WP347LN	CR347LN	S34751	1900 [1040]	water or other rapid cool
WPS34752	CRS34752	S34752	1940-2140 [1060-1170]	water or other rapid cool
WP348	CR348	S34800	1900 [1040]	water or other rapid cool
WP348H	CR348H	S34809	1925 [1050]	water or other rapid cool
WPS38815	CRS38815	S38815	1950 [1065]	water or other rapid cool

[A] Naming system developed and applied by ASTM International.
[B] Where a range of temperature is not listed, the single value shown shall be the minimum required temperature.
[C] Heat Treatment is highly dependent on intended service temperature; consult material manufacturer for specific heat treatments for end use temperature.

The EN 10253-4 norm is telling us that heat treatment is not required.

8.2.3 Heat treatment

8.2.3.1 Cold forming

Fittings, produced from solution annealed and quenched or stabilised materials using cold forming as manufacturing method, do not require heat treatment afterwards, if in the case of austenitic steels with required minimum values for elongation $A_5 > 30$ %, a 15 % level of cold deformation is not exceeded on the base material or if evidence is supplied that there is a minimum post cold-forming residual elongation A_5 of 15 %. In any case, the post cold-forming residual elongation shall be at least 14 %.

If heat treatment still will be demanded, this shall be agreed at the time of enquiry and order.

5.3 CURVATURE RADIUS

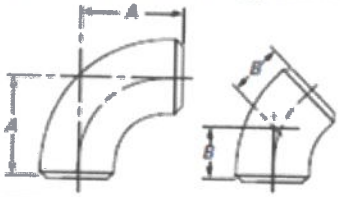
EN10253-3 defines standard curvature radiuses as 2D / 3D / 5D where Radius is a multiple of the diameter of the fitting.

AMSE B16.9 defines standard curvature radiuses as short and long radius but they also have a 3D elbow that has a different meaning: 3D means that the centre-to-end length is equal to 3 times the diameter, it is different from the curvature radius.

e.g. the radius for small sizes are different 21.3 mm is 28 mm in EU norm and 38 mm in US.

AMSE B16.9 extract:

Table 6 Dimensions of 3D Elbows



Nominal Pipe Size (NPS)	Outside Diameter at Bevel	Center-to-End	
		90-deg Elbows, A	45-deg Elbows, B
¾	26.7	57	24
1	33.4	76	31
1¼	42.2	95	39
1½	48.3	114	47
2	60.3	152	63
2½	73.0	190	79
3	88.9	229	95
3½	101.6	267	111
4	114.3	305	127
5	141.3	381	157
6	168.3	457	189
8	219.1	610	252
10	273.0	762	316
12	323.8	914	376

EN10253-4 extract:

Annex A
(normative)

Structural dimensions of fittings

The structural dimensions of fittings listed in Table A.1, Table A.2, Table A.5 and Table A.7 are based on ISO 5251 and ISO 3419.

Table A.1 — Below is structural dimensions for elbows with bending radius 2D, 3D and 5D listed

DN	*D* mm	2D			3D			5D
		F mm	*C* mm	*B* mm	*F* mm	*C* mm	*B* mm	*F* mm
15	21,3	25	50	36	28	56	38	45
20	26,9	25	50	39	29	58	43	57
25	33,7	28	56	42	38	76	55	72
32	42,4	32	64	53	48	96	69	93
40	48,3	38	76	62	57	114	81	108
50	60,3	51	102	81	76	152	106	135
65	76,1	63	127	102	95	190	133	175
80	88,9	76	152	121	114	228	159	205
100	114,3	102	203	159	152	304	209	270
125	139,7	127	254	197	190	380	260	330
150	168,3	152	305	237	229	458	313	390
200	219,1	203	406	313	305	610	414	510
250	273,0	254	508	391	381	762	518	650
300	323,9	305	610	467	457	914	619	775
350	355,6	356	711	533	533	1066	711	850
400	406,4	406	813	610	610	1220	813	970
450	457,0	457	914	686	686	1372	914	1122
500	508,0	508	1016	762	762	1524	1016	1245
600	610,0	610	1220	914	914	1828	1219	1524
700	711,0	711	1422	1066	1067	2134	1422	1778
800	813,0	813	1626	1220	1219	2438	1625	2033
900	914,0	914	1828	1371	1372	2744	1829	2285
1000	1016,0	1016	2032	1524	1524	3048	2032	2540

5.4 MANUFACTURING TOLERANCES

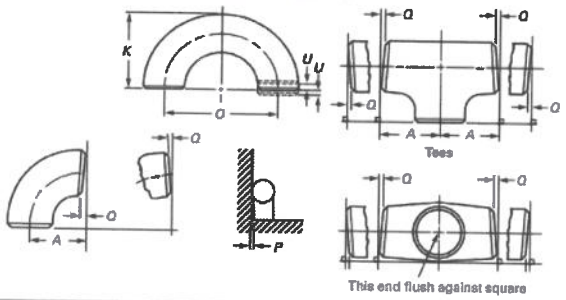
When it comes to tolerances, ASME B16.9 offers general tolerances whereas EN10253-4 specifies different classes of tolerances (D2/D3/D4) based on the pipes classes of tolerances on diameter and thicknesses (D1/D2/D3/D4 - T1/T2/T3/T4).

Values for tolerances are different and implies that though overall manufacturing process is the same, there are specificities to comply with these tolerances.

(please see the next page)

ASME B16.9 extract:

Table 11-1 Tolerances



Nominal Pipe Size (NPS)	DN	All Fittings [Notes (1) and (2)]: Outside Diameter at Bevel, *D*, mm (in.) [Notes (3) and (4)]	All Fittings [Notes (1) and (2)]: Inside Diameter at End, mm (in.) [Notes (3) and (5)]	Center-to-End Dimensions, mm (in.): 90-deg and 45-deg Long and Short Radius Elbows and Tees, *A, B, C, M*	Center-to-End Dimensions, mm (in.): 3D Radius Elbows, *A, B*	Overall Length of Reducers and Lap Joint Stub Ends, *F, H*, mm (in.)	Overall Length of Caps, *E*, mm (in.)	180-deg Returns: Center-to-Center Dimension, *O*, mm (in.)	180-deg Returns: Back-to-Face Dimension, *K*, mm (in.)	180-deg Returns: Alignment of Ends, *U*, mm (in.)
½ to 2½	15 to 65	+1.6, −0.8 (+0.06, −0.03)	0.8 (0.03)	2 (0.06)	3 (0.09)	2 (0.06)	3 (0.12)	6 (0.25)	6 (0.25)	1 (0.03)
3 to 3½	80 to 90	1.6 (0.06)	1.6 (0.06)	2 (0.06)	3 (0.09)	2 (0.06)	3 (0.12)	6 (0.25)	6 (0.25)	1 (0.03)
4	100	1.6 (0.06)	1.6 (0.06)	2 (0.06)	3 (0.09)	2 (0.06)	3 (0.12)	6 (0.25)	6 (0.25)	1 (0.03)
5 to 8	125 to 200	+2.4, −1.6 (+0.09, −0.06)	1.6 (0.06)	2 (0.06)	3 (0.09)	2 (0.06)	6 (0.25)	6 (0.25)	6 (0.25)	1 (0.03)
10 to 18	250 to 450	+4.0, −3.2 (+0.16, −0.12)	3.2 (0.12)	2 (0.09)	3 (0.12)	2 (0.09)	6 (0.25)	10 (0.38)	6 (0.25)	2 (0.06)
20 to 24	500 to 600	+6.4, −4.8 (+0.25, −0.19)	4.8 (0.19)	2 (0.09)	3 (0.12)	2 (0.09)	6 (0.25)	10 (0.38)	6 (0.25)	2 (0.06)
26 to 30	650 to 750	+6.4, −4.8 (+0.25, −0.19)	4.8 (0.19)	3 (0.12)	6 (0.25)	5 (0.19)	10 (0.38)	...	...	...
32 to 48	800 to 1 200	+6.4, −4.8 (+0.25, −0.19)	4.8 (0.19)	5 (0.19)	6 (0.38)	5 (0.19)	10 (0.38)	...	...	...

Nominal Pipe Size (NPS)	DN	Lap Joint Stub Ends [Note (6)]: Outside Diameter of Lap, *G*, mm (in.)	Lap Joint Stub Ends [Note (6)]: Fillet Radius of Lap, *R*, mm (in.)	Lap Joint Stub Ends [Note (6)]: Lap Thickness, mm (in.)	Nominal Pipe Size (NPS)	DN	Angularity Tolerances, mm (in.): Off Angle, *Q*	Angularity Tolerances, mm (in.): Off Plane, *P*
½ to 2½	15 to 65	+0, −1 (+0, −0.03)	+0, −1 (+0, −0.03)	+1.6, −0 (+0.06, −0)	½ to 4	15 to 100	1 (0.03)	2 (0.06)
3 to 3½	80 to 90	+0, −1 (+0, −0.03)	+0, −1 (+0, −0.03)	+1.6, −0 (+0.06, −0)	5 to 8	125 to 200	2 (0.06)	4 (0.12)
4	100	+0, −1 (+0, −0.03)	+0, −2 (+0, −0.06)	+1.6, −0 (+0.06, −0)	10 to 12	250 to 300	3 (0.09)	5 (0.19)
5 to 8	125 to 200	+0, −1 (+0, −0.03)	+0, −2 (+0, −0.06)	+1.6, −0 (+0.06, −0)	14 to 16	350 to 400	3 (0.09)	6 (0.25)

ASME B16.9-2018

Table 11-1 Tolerances (Cont'd)

Nominal Pipe Size (NPS)	DN	Lap Joint Stub Ends [Note (6)]: Outside Diameter of Lap, *G*, mm (in.)	Lap Joint Stub Ends [Note (6)]: Fillet Radius of Lap, *R*, mm (in.)	Lap Joint Stub Ends [Note (6)]: Lap Thickness, mm (in.)	Nominal Pipe Size (NPS)	DN	Angularity Tolerances, mm (in.): Off Angle, *Q*	Angularity Tolerances, mm (in.): Off Plane, *P*
10 to 18	250 to 450	+0, −2 (+0, −0.06)	+0, −2 (+0, −0.06)	+3.2, −0 (+0.12, −0)	18 to 24	450 to 600	4 (0.12)	10 (0.38)
20 to 24	500 to 600	+0, −2 (+0, −0.06)	+0, −2 (+0, −0.06)	+3.2, −0 (+0.12, −0)	26 to 30	650 to 750	5 (0.19)	10 (0.38)
26 to 30	650 to 750	...	...	...	32 to 42	800 to 1 050	5 (0.19)	13 (0.50)
32 to 48	800 to 1 200	...	...	...	44 to 48	1 100 to 1 200	5 (0.19)	19 (0.75)

GENERAL NOTE: Tolerances are equal plus and minus except as noted.

NOTES:
(1) The inside diameter and the nominal wall thicknesses at ends are to be specified by the purchaser.
(2) A minimum wall thickness of 87.5% applies unless the purchaser specifies a different wall thickness tolerance. See Figure 8-1, Note (1)(a).
(3) Out-of-round is the sum of absolute values of plus and minus tolerances.
(4) This tolerance may not apply in localized areas of formed fittings where increased wall thickness is required to meet design requirements of para. 2.2.
(5) Unless otherwise specified by the purchaser, these tolerances apply to the nominal inside diameter, which equals the difference between the nominal outside diameter and twice the nominal wall thickness.
(6) See Table 6.1-9 for limiting dimensions of outside diameter of barrel.

ASME B

EN10253-4 extract:

Table 8 — Tolerances on diameter *D/ID*

Tolerance on *D/ID*	
EN Tolerance class	Permissible deviation
D2	± 1,0 % or ± 0,5 mm whichever is the greater
D3[a]	± 0,75 % or ± 0,3 mm whichever is the greater
D4[a]	± 0,5 % or ± 0,1 mm whichever is the greater

[a] **Option 13:** *The fittings may be ordered with tolerance classes D3 or D4.*

11.2.2 Out of roundness

The out-of-roundness (0) shall be calculated using the following equation:

$$0 = \frac{D_{max} - D_{min}}{D} 100 \quad (1)$$

where

0 = out-of-roundness, in percentage;

D_{max} = maximum outside diameter D measured in the same plane, in millimetres;

D_{min} = minimum outside diameter measured in the same plane, in millimetres;

D = specified outside diameter, in millimetres.

For fittings of outside diameter $D \leq 406{,}4$ mm, out-of-roundness, shall be included in the limits of the diameter tolerances. Measurement shall be performed at the welding ends.

For fittings of outside diameter $D > 406{,}4$ mm and with D/T less than or equal to 100, out-of-roundness shall not exceed 2 %.

For fittings with a D/T ratio > 100 the values for out-of-roundness shall be agreed at the time of enquiry and order.

For elbows, the out–of–roundness on the body of the fitting shall not exceed 4 %.

11.2.3 Wall thickness tolerances at the welding ends

The wall thickness at the welding ends of fittings covered by this European Standard shall be within the tolerance limits given in Table 9. The minus tolerances apply also to the wall thickness at the body of the fitting.

Table 9 — Tolerances on wall thickness *T*

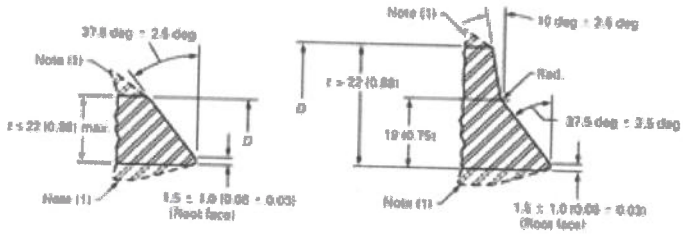
Diameter (*D*)	Wall thickness (*T*)	Permissible deviation	
		Minus	Plus
$D \leq 610$	all	- 12,5 %	+ 15 %
$D > 610$	≤ 10 mm	- 0,35 mm	+ 15 %
	> 10 mm	- 0,50 mm	+ 15 %

5.5 FINISHING OF THE FITTINGS - BEVELING

Bevelling is clearly stated in the ASTM fittings whereas it is not required by EN10253-3 and left as option (14) to be discussed between buyer and seller.

ASME B16.9 extract:

Table 6-1 Welding Bevels and Root Face



(a) Plain Bevel (b) Compound Bevel

Nominal Wall Thickness, *t*, mm (in.)	End Preparation
Less than *x* (Note (2))	Cut square or slightly chamfer, at manufacturer's option (not illustrated)
x to 22 (0.88), inclusive (Note (2))	Plain bevel as in illustration (a) above
More than 22 (0.88)	Compound bevel as in illustration (b) above

GENERAL NOTE: In the illustrations, dimensions in parentheses are in inches; other dimensions are in millimeters.

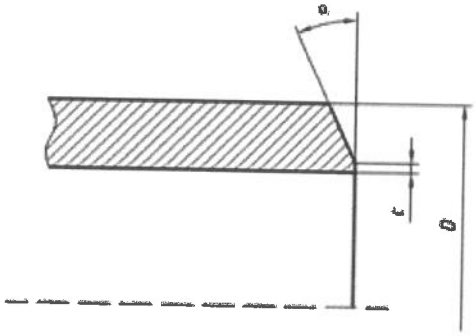
NOTES:
(1) See paragraph 6 and Figure 6-1 for transition contours.
(2) *x* = 5 mm (0.19 in.) for carbon steel or ferritic alloy steel and 3 mm (0.12 in.) for austenitic steel or nonferrous alloys.

EN10253-4 extract:

11.3 Performance of the end bevelling

Fittings shall be delivered with square cut ends. The ends shall be free from excessive burrs.

Option 14: Fittings with wall thickness ≥ 3,2 mm shall be delivered with bevelled ends (see Figure 14). The bevel shall have an angle α of (30 $^{+5}_{0}$)° with a root face C of 1,6 mm ± 0,8 mm, except that for wall thickness greater than 20 mm, an agreed alternative bevel may be specified



Key

α angle
C root face
D outside diameter

Figure 14— Fitting end bevel

5.6 OTHER DIFFERENCES

5.6.1 There are (slightly) differences between 304L and 1.4307 Cr 304L = 18%-20% 1.4307 Cr = 17.5%-19.5% also 316L Cr = 16%-18% and 1.4404 Cr is 16.5%-18.5% so these are not interchangeable (please see attachment 8. The chemical composition differences on important (and expensive) parts regarding the amount of Nickel and Chrome. That's why the American and European fittings are not interchangeable and so clients ask specific for ASTM or EN fittings. This we can prove with inquiries and orders from Union importers such as the inquiry and estimate as enclosed in attachment 9.

5.6.2 Also in mechanical values are (small) differences. See also attached certificates (attachment 10).

6 INPUT FROM IMPORTERS

6.1 In their submissions related to the R758 expiry review case, their letter of 20 April 2022 (t22.002425) and 15 February 2022 (t22.001287) and in their input linked to the R777 investigation (observation on Paul Meijering Metalen's post-hearing submission of 27 July 2022 (t22.004407) the "Defcom" seems to be systematically questioning the right of EURANIMI to share its opinion with the Commission while dismissing as inappropriate the relevant technical arguments expressed by the association formed by the Union producers' own customers. In their letter dated April 20, (t22.002425 NCF date 29/07/2022) the Defence Committee observes *that no party came forward as unrelated importer in this proceeding*. We regret that, in this investigation, the Defence Committee seems to attach much more importance to details of a strictly legal nature than to the technical substance of the investigation.

Undoubtedly for reasons of ignorance of the EC investigation procedures and the fact that these investigations are perceived as a debate among lawyers rather than between market insiders, most SMEs are reluctant to participate in such EC-investigations. Very few of them can afford spending the necessary amount of executive-time on top of the heavy fees of specialized attorneys. The potential individual benefit that such unrelated importers could obtain in return to such important efforts would definitely not be in proportion to the one the Union producers could expect from such proceedings.

6.2 At this date, the Union producers do no longer ignore the identity of most of the companies and groups that have chosen to express their voice together via their European association, EURANIMI: these individual companies and European groups count among the main customers of the Applicants. The very strong commercial ties between these EU-distributors and their European proximity-suppliers is obviously the reason why the members of EURANIMI do not wish to raise individual concerns, but rather chose to express them collectively.

7 REQUEST FOR INFORMATION AT PROVISIONAL STAGE

7.1 With this writing, EURANIMI as the representative association for Union importers request information on the planned imposition of provisional duties based on Article 19a of 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 (codification).

8 CONCLUSION

8.1 The members of EURANIMI unanimously state that they highly appreciate and cherish their contacts and the important business flow that they conduct with the Union producers. These groups and individual companies are conscious of the vulnerable position of Union producers regarding the competition from mainly Asian producers. EN/DIN fittings are the primary market of the Union producers and the members of EURANIMI fully agree that the Union producers should be protected against unfair competition.

8.2 In the best interests of the European market and their common customers, the members of EURANIMI who enjoy daily open and friendly contacts with their European suppliers, encourage the Union producers to, in the future, consider an equally open dialogue with them, to seek solutions among market insiders, rather than to have a regulation imposed by the European authorities, on the basis of arguments that - for reasons explained above - are mostly solely developed by the Union producers themselves.

8.3 In this document, EURANIMI has endeavoured to demonstrate that fittings are either produced according to European standards or according to American standards and that the overlapping zone is relatively small. Even if in some cases, at the initial stage of a new project, there would be no barrier to use either standard anywhere in the Union[3], the object and the purpose of this investigation is not to promote the use of European standards above American ones but solely to protect the Union Industry against unfair practices from abroad.

8.4 As demonstrated above, in the Union interest (ref. article 21 of Regulation (EU) 2016/1036)), it should be recognized by the European Commission that the Union production is relatively marginal in terms of real production and effective offer of ASTM/ANSI type fittings and that an adequate and fair solution can only be found if this reality is thoroughly taken into consideration by the Commission.

8.5 Failing which, downstream manufacturers supplying their customers in- or outside the EU with equipment mounted with ASTM/ASME fittings or supplying non-EU customers with replacement ASTM/ASME fittings will lose their competitiveness towards non-EU suppliers that have access to the full range of these fittings at much lower prices.

EURANIMI and the Union importers remains at the Commission's disposal for any additional information.

Sincerely,

Roelof Andringa

Jefke Daems

[3] Commission Implementing Regulation (EU) 2017/141 of 26 January 2017 recital (55) *Third, both product types are in competition to each other. Whereas it is true that for certain projects, the specifications will require the use of EN/DIN or ASME/ANSI, at the point in time at which the engineers decide on the choice of the standard, both specifications compete. This is witnessed by the fact that the use of EN/DIN and ASME/ANSI standards differs between Member States based on historical patterns, but there is no barrier for new projects to use either standard everywhere in the Union.*