



European Commission
Directorate General for Trade
Directorate H
Office: N105 04/092
1049 Bruxelles Belgique

**Letter to the European Commission
National Associations (NAs) and companies members of NAs**

Brussels, March 2009

AD - 545 Anti-dumping proceeding concerning imports of certain continuous filament glass fiber products originating in the People's Republic of China

Dear Sirs,

Following the notice of initiation of anti-dumping proceedings concerning imports of certain continuous filament glass fiber products from China, published on the 17th December 2009 in the Official Journal of the EU, our [*national association/company*] feels compelled to react.

While the short deadline for users to express their opinion on this investigation passed (25 January 2010), we feel that is essential to still provide our comments on such a significant matter for our industry, with the aim of presenting a full picture and support the ongoing investigation.

[Description of the national association representation and activities of its members/ description of the company's activities]

Our [*Association/company*] is very concerned about the anti-dumping proceedings concerning certain continuous filament glass fiber products from China, following allegations lodged by the European Glass Fiber Producers Association (APFE).

In our view the complaint seems unreasonable and is a reaction of the European glass fiber producers to retain their share market as result of a normal increase of global business competition. It is our assessment that imposing any measures will out pass the negative effects this measures will have on employment, ongoing and future technological developments.

Anti-dumping measures will significantly affect the composite production and the actors involved in the chain

Please acknowledge our following reasoning:

- We fear that the introduction of anti-dumping measures due to allegations from European glass fibre producers will have significant, negative consequences for our [*member companies/our company*], as well as for the whole European industry and the European Community.
- The use of glass fibre from China is a natural consequence of global business developments, and in order to retain production, our [*member companies/company*] find it necessary to buy parts of the glass fiber used from outside Europe, i.e China. Furthermore, imports from China are also having an effect on the significant price level of glass fibre, which the European industry has had to pay in the past.

[Additional remarks from national association/company]

- If anti - dumping measures are to be imposed in the near future, the competitiveness will deteriorate due to high prices to produce composite products.
- The use of glass fiber products from China by our [*member companies/company*] is a consequence of high level quality standards and lack of availability in some cases on the European market. Also a change back to other products would be of considerable cost to re-qualify already approved products or not approved by our customers.

The table below provides information about the products under investigation and the difference (if any) in quality and availability based on [*our member companies assessment/our company experience*].



	Characteristics of the product produced in the Union	Characteristics of the product imported from China	Characteristics of the product imported from third countries	Quantify the value of the difference and substantiate
Chopped glass fibre strands (grade 1)				
Chopped glass fibre strands (grade 2)				
Glass fibre rovings				
Slivers and yarns of glass fibre filaments				
Mats made of glass fibre filaments				

- Potential anti-dumping duties will see an increase in the price of both components and the finished glass-fiber reinforced products. The increase will be closely linked to the value of the anti-dumping duties. Further on, this price increases will unbalance the free global business market and will act as a barrier between producers inside the EU and the rest of the world.
- This development will push our industry towards relocation to countries outside Europe, including US, India and China, due to very high competitive labor production costs.
- The dramatic effects underlined above for our industry will further affect other industries in terms of employment and future investments. Many current jobs will be lost and the potential to create jobs related to research and product development in renewable energies and other energy- efficient products for the transport, building & construction, consumer goods, aerospace, sports & leisure, electrical and electronics sectors will be inexistent.
- Within EuCIA, the European Composites Industry Association, more than 100.000 jobs are involved directly in the composite industry. A reduction of 3-5% of workforce is to be expected if anti-dumping measures are to be imposed.
- The table below provides an estimation of the effects of anti-dumping measures on the employment based on [our *member companies' response/ company*].

	2009	2010/11*	2012 – 2014 (estimated)*
Number of employees			

**Estimated number of employees if anti-dumping measures are to be imposed*

Furthermore, our industry will be long term affected in terms of the use of glass-fibre reinforced plastics materials. The shift from traditional materials such as steel and aluminium to composite materials will be hard to maintain in the future at the expense of its excellent qualities and low energy use credentials.

[Conclusion remarks from national association/company members]

We would appreciate, if the European Commission will investigate very careful the case and will consider the negative effects on our industry and individual businesses.

In case there are further questions, please do not hesitate to contact the below mentioned person.

Name/ position

Contact details /signature

Place of the national association /company representative