

REPORT NO.362

**SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON HEXAGON BOLTS AND NUTS
OF IRON OR STEEL ORIGINATING IN OR IMPORTED FROM THE PEOPLE'S REPUBLIC
OF CHINA: FINAL DETERMINATION**

The International Trade Administration Commission of South Africa herewith presents its
Report No. 362: **SUNSET REVIEW OF THE ANTI-DUMPING DUTIES ON HEXAGON
BOLTS AND NUTS OF IRON OR STEEL ORIGINATING IN OR IMPORTED FROM THE
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CHIEF COMMISSIONER

PRETORIA
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1. APPLICATION AND PROCEDURE

- 1.1** This investigation was conducted in accordance with the International Trade Administration Act, 2002, and the International Trade Administration Commission of South Africa Anti-Dumping Regulations (ADR).
- 1.2** ITS Trade (Pty) Ltd lodged the application on behalf of South African Fastener Manufacturers Association (SAFMA). SAFMA represents all the manufacturers in the SACU industry, but in this case it represents CBC Fasteners (Pty) Ltd and Transvaal Pressed Nuts, Bolts & Rivets (Pty) Ltd. The Applicant accounts for 51 per cent of the total SACU production.
- 1.3** The SACU industry consists of the following manufacturers of the subject products: CBC Fasteners (Pty) Ltd, Transvaal Pressed Nuts, Bolts & Rivets (Pty) Ltd, Daltron Forge CC, SA Bolt Manufactures Company (Pty) Ltd and Bolt Corporation (Pty) Ltd.
- 1.4** On 26 June 2009, the Commission notified interested parties through Notice No.902 in Government Gazette No.32333 that unless a substantiated request is made indicating that the expiry of the anti-dumping duties against imports of bolts and nuts originating in or imported from the People's Republic of China (PRC) would likely lead to the continuation or recurrence of dumping and material injury, the anti-dumping duties on the subject products would expire on 02 June 2010.
- 1.5** A sunset review application questionnaire was received from ITS Trade (Pty) Ltd on 02 December 2009. The application was accepted as properly documented on 26 April 2010. The information submitted by the Applicant was verified on 03 and 04 May 2010.
- 1.6** The Commission initiated a sunset review investigation pursuant to Notice No.418 in Government Gazette No.33210, published on 28 May 2010. All known interested parties were notified of the initiation of the investigation and initiation letters were sent to interested parties on 02 June 2010.

- 1.7** One manufacturer of bolts from the PRC, Ningbo Jinding Fastening Piece Company Limited responded to the Commission's exporter questionnaire and the information submitted was verified on 18 to 20 August 2010.
- 1.8** Three SACU importers responded to the investigation namely Bearing Man Group, Shenka Industries and Pro-Tech Fasteners. Bearing Man Group responded fully to the Commission's importer questionnaire and the information submitted was verified on 04 August 2010. All the verified information was considered by the Commission for its final determination.
- 1.9** Shenka Industries CC stated that they did not import the subject product during the period of investigation, but submitted comments. The Commission considered the comments submitted by Shenka Industries CC for its final determination.
- 1.10** The response submitted by Pro-Tech Fasteners was found to be deficient. The information was deficient in that there was no non-confidential version of the response, no electronic response, no details of the imports made during the period of investigation, no information of sales of the imported products, no sworn statement for confidential information that was not summarised and no information on the similarity or differences between the SACU product and the imported product. A deficiency letter was sent out, but the importer did not address the deficiencies. The Commission did not consider the information submitted by Pro-Tech Fasteners for its final determination.
- 1.11** The Commission considered all the other information submitted by interested parties for its final determination. The Commission therefore issued an essential facts letter indicating that it was considering making a final determination that the expiry of the anti-dumping duties on hexagon bolts and nuts originating in or imported from the PRC, excluding bolts manufactured by Ningbo Jinding Piece Company Limited, would likely lead to the continuation of dumping and continuation of material injury.
- 1.12** Comments to the essential facts letter were received from ITS Trade on behalf of the Applicant. Xikhovha Advisory requested an oral hearing on behalf of Ningbo Jinding and Bearing Man Group. The oral hearing was held at the ITAC offices on 09

November 2010. The information presented at the oral hearing and comments received from ITS Trade were considered by the Commission for its final determination.

1.13 After considering all the information and comments received, the Commission made a final determination that:

- The expiry of the anti-dumping duties on nuts would likely lead to the continuation of dumping and material injury to the SACU industry;
- The expiry of the anti-dumping duties on bolts manufactured by Ningbo Jinding Piece Company Limited would not likely lead to the continuation or recurrence of dumping and material injury to the SACU industry; and
- The expiry of the anti-dumping duties on bolts manufactured by all other manufacturers in the PRC would likely lead to the continuation of dumping and material injury to the SACU industry.

2. PRODUCTS, TARIFF CLASSIFICATION AND DUTIES

2.1 IMPORTED PRODUCTS

2.1.1 Description

The subject product is described as hexagon bolts and nuts whether or not in metric or imperial sizes.

2.1.2 Tariff classification

The subject product is classifiable as follows:

Tariff subheading	Description		Rates of duty			
			General	EU	EFTA	SADC
7318.15.43	Other bolts (excluding bolt ends, screw studs and screw studding) with hexagon heads	Kg	10%	2.5%	6.3%	Free
7318.16.90	Other nuts	Kg	10%	2.5%	10%	Free

NOTE: The hexagon bolts are now classifiable under tariff subheading 7318.15.43 and no longer 7318.15.90 which was applicable when the investigation was initiated.

The following anti-dumping duties are applicable to the subject product, hexagon bolts and nuts of iron or steel, classifiable under tariff subheadings 7318.15 and 7318.16, originating in or imported from the PRC:

Tariff heading	Code	Description	Imported from or originating in	Anti-Dumping Duty
7318.15	01.06	Bolts, of iron or steel, with hexagon heads (excluding bolts of stainless steel, bolts fitted with base metal expansion sleeves and bolts identifiable for use solely or principally on aircraft) of a width of 6mm or more but not exceeding 36mm and a length of 10mm or more but not exceeding 400mm, whether or not with their nuts and washers.	PRC	29%
7318.16	01.06	Hexagon nuts, of iron or steel (excluding dome nuts with non-metallic inserts, nuts of stainless steel, nuts identifiable for use solely or principally on aircraft and collared nuts) of a thread diameter of 6mm or more but not exceeding 36mm (excluding self-locking nuts of a thread diameter exceeding 10mm)	PRC	36%

2.2 SACU PRODUCT

2.2.1 Description

The like product is described as hexagon nuts, of iron or steel (excluding dome nuts with non-metallic inserts, nuts of stainless steel, nuts identifiable for use solely or principally on aircraft and collared nuts) of a thread diameter of 6mm or more but not exceeding 36mm (excluding self-locking nuts of a thread diameter exceeding 10mm) and bolts of iron or steel, with hexagon heads (excluding bolts of stainless steel, bolts fitted with base metal expansion sleeves and bolts identifiable for use solely or principally on aircraft), of a width of 6mm or more but not exceeding 36mm and a

length of 10mm or more but not exceeding 400mm, whether or not with their nuts and washers.

2.2.2 Production Process

Hexagon bolts and nuts are produced from steel, undergoing the following processes: spherodising, picking & phosphating, wire drawing, forging, thread rolling, heat treatment, galvanising or packaging and dispatch. The subject products are used in almost all industries in joining materials, such as mining, construction, agriculture, utilities, process industries, automotive industries, general engineering and do it yourself industries.

2.3 LIKE PRODUCT ANALYSIS

	Imported product	SACU product
Raw materials	Hot rolled rods of iron with a thickness not exceeding 14 mm.	Hot rolled rods of iron with a thickness not exceeding 14 mm.
Physical characteristics and appearance	Hexagon nuts, of iron or steel (excluding dome nuts with non-metallic inserts, nuts of stainless steel, nuts identifiable for use solely or principally on aircraft and collared nuts) of a thread diameter of 6mm or more but not exceeding 36mm (excluding self-locking nuts of a thread diameter exceeding 10mm). Bolts of iron or steel, with hexagon heads (excluding bolts of stainless steel, bolts fitted with base metal expansion sleeves and bolts identifiable for use solely or principally on aircraft), of a width of 6mm or more but not exceeding 36mm and a length of 10mm or more but not exceeding 400mm, whether or not with their nuts and washers.	Hexagon nuts, of iron or steel (excluding dome nuts with non-metallic inserts, nuts of stainless steel, nuts identifiable for use solely or principally on aircraft and collared nuts) of a thread diameter of 6mm or more but not exceeding 36mm (excluding self-locking nuts of a thread diameter exceeding 10mm). Bolts of iron or steel, with hexagon heads (excluding bolts of stainless steel, bolts fitted with base metal expansion sleeves and bolts identifiable for use solely or principally on aircraft), of a width of 6mm or more but not exceeding 36mm and a length of 10mm or more but not exceeding 400mm, whether or not with their nuts and washers.

Tariff classification	7318.16.90 and 7319.15.43	7318.16.90 and 7318.15.43
Production process	Inputs (steel), spherodising, Pickling & phosphating, wire drawing, forging, thread rolling, heat treatment, galvanising or packaging and dispatch.	Inputs (steel), spherodising, Pickling & phosphating, wire drawing, forging, thread rolling, heat treatment, galvanising or packaging and dispatch.
Application or end use	The subjects goods are used in almost all industries for joining materials, such as mining, construction, agriculture, utilities, process industries, automotive industries, general engineering and do it yourself industries.	The subjects goods are used in almost all industries for joining materials, such as mining, construction, agriculture, utilities, process industries, automotive industries, general engineering and do it yourself industries.
Substitutability	The SACU product and the imported product are fully substitutable with no process changes.	The SACU product and the imported product are fully substitutable with no process changes.
Any other factors proven to the satisfaction of the Commission to be relevant	None	None

Taking the above into consideration, the Commission made a final determination that the SACU product and the imported product from the PRC are like products, for purposes of comparison, in terms of Section 1 of the ADR.

3. INDUSTRY STANDING

3.1 INDUSRTY STANDING

The information submitted by the Applicant indicated that the production volumes of CBC Fasteners and Transvaal Pressed Nuts Bolts and Rivets constitute 51 percent of the total SACU production volumes and the application was supported by other manufacturers that contribute 44 percent of the SACU total production volumes. The Commission therefore made a final determination that the application can be regarded as being made "by or on behalf of the domestic industry".

4. DUMPING

4.1 METHODOLOGY IN THIS INVESTIGATION

4.2.1 Dumping (Bolts)

Normal value (Ningbo Jinding Piece Company Limited)

Ningbo Jinding Piece Company Limited manufactured and sold bolts in its domestic market during the period of investigation. Eighty-one per cent (81%) of the domestic sales were made at a loss. Therefore in terms of the ADR these sales were not considered to be made in the ordinary course of trade. The normal value was then constructed using the verified cost of production, plus selling, general and administrative costs and profit.

Export price (Ningbo Jinding Piece Company Limited)

Ningbo Jinding Piece Company Limited did not export bolts to SACU during the period of investigation but exported to 22 other countries. It is the Commission's practice to use an export price to a selected third country, if there were no exports to SACU during the period of investigation. In choosing the third country the Commission may consider any relevant factor, including any or all of the following factors, with no one or several of these factors necessarily giving decisive guidance:

- (a) the similarity of the like product used to establish the normal value and the product exported from the country of origin to the third country in terms of the criteria used by the Commission in its like product analysis;
- (b) the similarity in the level of development of the domestic industry in SACU and the third country producing the like product, including but not limited to, the existence and number of domestic producers of the like product; and the domestic market in SACU and the third country in respect of the like product, including but not limited to, the volume of production, consumption, exports and imports of the like product;
- (c) the similarity in the volume of domestic sales of the like product in the country of origin and exports from the country of origin to the third country; and
- (d) sales in the domestic market of the country of origin and in the third country are at the same level of trade.

The Commission used the price of exports to India, as India met all the Commission's criteria for selecting a third country.

The Commission allowed the following adjustments to the export price:

- Rebates;
- Freight and insurance;
- Packaging; and
- Inland freight.

4.2.2 Margin of Dumping

The margin of dumping was calculated to be -11.2 per cent.

Summarised comments of ITS on essential facts

ITS stated that the Commission should be assessing the likelihood of the recurrence of dumping by Ningbo, should the duties be removed. ITS stated that the European Union recently investigated Ningbo and applied significant anti-dumping duties against it and this clearly establishes the fact that the likelihood exists that Ningbo is likely to dump to SACU again. ITS asked if India was chosen because it is the only country where Ningbo was not dumping, as the criteria used by the Commission do not provide the actual factors considered by the Commission in selecting a third country.

Commission's consideration

The fact that an exporter was found by another country to be dumping is not a factor considered by the Commission to indicate likelihood of dumping in the SACU. India was chosen because it met the criteria used by the Commission in choosing a third country for determination of the export price where there were no exports to SACU during the period of investigation. The criteria are described in page 11 of this report.

Comments of Xikhovha Advisory (Xikhovha)

Xikhovha indicated that the Commission should use Australia for the determination of the export price.

Commission's consideration

Xikhovha did not substantiate its recommendation of Australia for determination of the export price. The Commission did not choose Australia as the products exported to Australia are not comparable to the products sold domestically in the PRC. The products exported to Australia are of a diameter of 16mm and above and are only high-dip galvanised (HDG), while the products sold in the PRC include products with a diameter less than 16 mm with different plating.

4.3 Residual dumping (bolts)

The residual dumping margin for all other manufacturers and/or exporters of bolts who did not cooperate in this investigation was determined using the best available information, being the information provided by the Applicant.

4.3.1 Margin of dumping

The margin of dumping was determined to be 55.9 per cent.

4.4 Dumping (Nuts)

Since no manufacturer and/or exporter of nuts from the PRC responded to the Commission's questionnaire, the normal value and the export price for nuts is calculated based on facts available, being the information supplied by the Applicant.

4.4.1 Margin of dumping

The margin of dumping was calculated to be 124.8 per cent.

Summarised comments by Xikhovha

- a) Xikhovha stated that the application was flawed because the dumping allegation appears to have been manipulated to create a dumping margin. It queried the small quantity for the normal value quote and a large quantity for the export price. Xikhovha provided the Commission with a sworn statement from the company which quoted the normal value stating that it does not normally deal in such small quantities.

Commission's consideration

There is no indication of manipulation in the dumping information provided by the Applicant. The Commission's normal value standard for initiation is that:

- the Applicant shall provide a reasonable proof of domestic price in the exporting country such as an invoice, quotes, price list or international publication;
- the date of the proof must be within the period of investigation; and
- if the domestic price is not at the same level of trade as the export price, then the Applicant must indicate reasonable adjustments to bring the price to a comparable level of trade with the export price.

The sworn statement also does not give any indication of manipulation of prices but just states that the manufacturer does not normally deal with such small quantities. The Commission requested a domestic price list or industry prices from the company that provided the quotation to the Applicant to determine if there was any manipulation to the domestic price but the company did not provide this information.

The Commission then compared the export prices of the verified exporter to other countries with the export price provided by the Applicant. It was found that the prices are in the same range. The Commission also determined from the verified exporter's export prices that the lowest export price does not relate to the biggest quantity and the highest price does not relate to the smallest quantity. The difference in prices is mainly caused by the product ranges and the plating of the products and not necessarily the quantities. This was learned at verification.

On the basis of the above, the Commission made a determination that there is no indication of manipulation.

- b) Xikhovha stated that the quote for normal value was obtained on an illegal currency in the PRC.

Commission's consideration

The Applicant asked to be quoted in either Chinese Yuan or US Dollars and the manufacturer quoted in US Dollars. What stands out in the request for the quote is that the goods will be used in the PRC.

- c) Xikhovha stated that the quote was of 22 models out of 300 000 models and it was further reduced to 13 models:

Commission's consideration

The figure of 300 000 models is unfounded as it is not substantiated. The quantity obtained was reduced from 22 to 13 models because it included setscrews which are not the subject products.

- d) Xikhovha stated that adjustments were unsubstantiated and not enough to cover for 17% VAT, wholesale margin, payment cost, transport to wholesaler, warehouse cost, insurance and transport to Shanghai.

Comments of the Applicant

The Applicant stated that it is virtually impossible to know the differences that may affect price comparability between normal value and export price. The Applicant stated that in order to account for differences that may exist, the normal value was adjusted by 20 per cent to bring it to a comparable level with the export price. The Applicant stated that at factory level, quotations are made based on price lists and normally the prices on the price lists are exclusive of VAT, as VAT has no bearing on the price paid by the customer since the customer will claim the VAT back. The Applicant further stated that when dealing with the customer who is not familiar with trading at factory level, the issue of VAT will clearly be specified on the quotes.

The Applicant questioned the legal standing of the sworn statement made by Ms Cathery Zhou because there is no indication that it was made under oath and appears to be made on personal capacity since it does not have a company stamp or on a company letter head or an indication of the capacity

she is acting on. Therefore, the Applicant stated that the Commission should not regard the statement made by Ms Zhou as a sworn statement.

Commission's consideration

The transaction was between the manufacturer and an end-user (the Applicant). It will not have two margins (wholesale and retail) as Xikhovha suggested. Since it is a cash transaction, the adjustment for payment costs is not needed. The goods were to be collected by the buyer, taking away transport to Shanghai. Warehouse cost and insurance differs from company to company, depending on whether the company incurs this expense and can account for it. The Commission normally allows adjustment for warehouse cost and insurance on verified exporters.

The Commission accepted that there is a 17 per cent VAT applicable in the PRC. This was determined on the verification of the responding exporter as its invoices clearly specified that VAT was included in the prices. However the quotation provided by the Applicant did not specify whether VAT is included in the prices. Since the quotation is silent on VAT and the sworn statement is questionable, the Commission decided to disregard the sworn statement made by Ms Cathery Zhou and not make a further adjustment for VAT on the normal value.

- e) Xikhovha stated that ITAC did not verify the dumping information before initiation as it does not appear on the Applicant's verification report.

Commission's consideration

The dumping information would not be verified at the Applicant's premises or appear on the Applicant's verification report. It is not the practice of the Commission to verify the dumping information before initiation but the validity checks are conducted and also dumping information is checked if it meets the requirements of the ADR 23. This was done.

- f) Xikhovha stated that the export quote was undated.

Commission's consideration

The quote was dated 14 September 2009.

- g) Xikhovha stated that it assumes no efforts were made to confirm the accuracy of the information before initiation, as it did not receive any response from the investigators when asked if this was done at the oral hearing.

Commission's consideration

Accuracy checks of the dumping information were conducted.

- h) Xikhovha requested that the essential facts letter be withdrawn in writing by the Commission and replaced with a new essential facts letter following the oral hearing.

Commission's consideration

It was explained to Xikhovha that the essential facts letter should not be construed as the Commission's final determination, as the Commission would still consider comments received from interested parties before making a final determination. It was also explained to Xikhovha that its presentation made on the oral hearing would be considered by the Commission in making its final determination and that a new essential facts letter would be issued if the Commission determines that new facts have emerged that warrant a different finding.

- i) Xikhovha stated that the applicant's proposed residual duty has the potential to be very significant and will be such as to effectively remove all competition from the market, which is not the purpose of anti-dumping duties.

Commission's consideration

Xikhovha is correct to say that anti-dumping duties are not meant to eliminate competition as the purpose is to level the playing field. It is the Commission's practice to impose or not impose specific anti-dumping duties on exporters that fully responded to the questionnaire and, in addition, a duty against the country in question to cater for all other possible manufacturers of the subject products

who might also export to SACU but did not participate in the investigation. This is a general practice of the Commission that applies to all anti-dumping sunset review investigations.

4.5 Conclusion

After considering all the received comments from interested parties, the Commission made a final determination that the expiry of the duties on hexagon bolts and nuts originating in or imported from the PRC, excluding bolts manufactured by Ningbo Jinding Piece Company Limited, would likely lead to the continuation of dumping.

5. MATERIAL INJURY

5.1 DOMESTIC INDUSTRY – MAJOR PROPORTION OF PRODUCTION

The following injury analysis relates to the information of CBC Fasteners and Transvaal Pressed Nuts and Bolts which together constitute 51 percent of the total domestic production of the subject product in the SACU industry.

The Commission made a final determination that the Applicants constitute “a major proportion” of the total production, in accordance with the Anti Dumping Regulations.

5.2 IMPORT VOLUMES AND EFFECT ON PRICES

5.2.1 Import volumes

The following tables show the volume of the allegedly dumped imports of the subject product from 2006 to 2009:

Table 5.2.1 (a): Import volumes (Bolts)

Country	2006 Tons	2007 Tons	2008 Tons	2009 Tons	Estimates of Imports if duty expires
Alleged imports: PRC	4 036	5 832	7 727	9 692	10 282
Other imports	4 028	2 733	2 561	1 202	1 200
Total imports	8 064	8565	10 288	10894	11 482
Alleged imports as % of total imports	50%	68.1%	75.1%	89%	89.5%

Table 5.2.1 (b): Import volumes (Nuts)

Country	2006 Tons	2007 tons	2008 Tons	2009 Tons	Estimates of Imports if duty expires
Alleged imports: PRC	1 217	2 380	2 074	1 836	1 948
Other imports	1 662	1 259	1 484	1 220	1 440
Total imports	2 879	3 639	3 558	3 056	3 388
Alleged imports as % of total imports	42.3%	65.40%	58.30%	60.07%	57.50%

5.2.2 Effects on prices

	2007	2008	2009	Estimate if duty expires 2010
Price depression: Applicant's selling price per (R/Kg):				
Bolts	100	120	164	138
Nuts	100	124	173	139
Price undercutting as a % of the Applicant's selling price:				
- Bolts	100	112	102	117
- Nuts	100	136	113	129
Cost as a% of the selling price:				
Bolts	100	92	91	108
Nuts	100	99	95	95

*This table was indexed due to confidentiality using 2007 as the base years

5.2.2 Economic factors

Material injury indicators	2007	2008	2009	2010 Est.
Applicant's Sales Volumes in the SACU (kg)				
Bolts	100	99	90	63
Nuts	100	107	89	57
Profit margin (Rands):				
Bolts	100	109	100	59
Nuts	100	95	103	80
Output (Kg):				
Bolts	100	93	73	63
Nuts	100	106	89	58
Market share – SACU sales volume:				
Bolts	100	99	90	63
Nuts	100	107	89	57
Market share of other imports				
Bolts	100	79.2	42.3	45.4
Nuts	100	128	128.8	155.1
Market share of alleged dumped imports:				
Bolts	100	118.9	137.6	165.9
Nuts	100	84.8	87.9	111.5
Productivity (Kg)	100	98	75	61
Return on total net assets	100	102	96	-22
Capacity utilization	100	98	75	60
Inventories (Kg)				
Bolts	100	75	78	84
Nuts	100	92	120	140
Employment : Production				
Bolts	100	97	91	77
Nuts	100	126	124	68
Net cash flow (Company)	100	127	60	-63
Wages: production (Rands)				
Bolts	100	100	104	88
Nuts	100	109	119	102

Magnitude of the margin of dumping:	
Bolts	55.9%
Nuts	124.8%

*This table was indexed due to confidentiality using 2007 as the base year, except the magnitude of the margin of dumping.

5.3 Conclusion

The commission made a final determination that the expiry of the anti-dumping duties on hexagon bolts and nuts would likely lead to the continuation of material injury to the SACU industry.

6. Summary of findings

6.1 Continuation or Recurrence of Dumping

The Commission made a final determination that:

- the expiry of the anti-dumping duties on nuts originating in or imported from the PRC would likely lead to the continuation of dumping;
- the expiry of the anti-dumping duties on bolts manufactured by Ningbo Jinding Piece Company Limited would not likely lead to the continuation or recurrence of dumping; and
- the expiry of the anti-dumping duties on bolts manufactured by all other manufacturers in the PRC would likely lead to the continuation of dumping.

6.3 Continuation or Recurrence of Material Injury

The Commission made a final determination that the expiry of the anti-dumping duties on hexagon bolts manufactured by all other manufacturers and nuts originating in or imported from the PRC would likely lead to the continuation of material injury to the SACU industry.

5. Recommendation

The Commission made a final determination that:

- The expiry of the anti-dumping duties on nuts would likely lead to the continuation of dumping and material injury to the SACU industry;
- The expiry of the anti-dumping duties on bolts manufactured by Ningbo Jinding Piece Company Limited would not likely lead to the continuation or recurrence of dumping and material injury to the SACU industry; and
- The expiry of the anti-dumping duties on bolts manufactured by all other manufacturers would likely lead to the continuation of dumping and material injury to the SACU industry.

The Commission therefore decided to recommend to the Minister of Trade and Industry that the anti-dumping duties be imposed as follows:

Tariff heading	Description	Imported from or originating in	Anti-dumping duty
7318.16	hexagon nuts, of iron or steel (excluding dome nuts with non metallic inserts, nuts of stainless steel, nuts identifiable for use solely or principally on aircraft and collared nuts) of thread diameter of 6mm or more but not exceeding 36mm (excluding self locking nuts of a thread diameter exceeding 10mm)	PRC	122.7%
7318.15	bolts of iron or steel with hexagon heads (excluding bolts of stainless steel, bolts fitted with base metal expansion sleeves, bolts identifiable for use solely or principally on aircraft and bolts manufactured by Ningbo Jinding Piece Company Limited), of a width of 6mm or more but not exceeding 36mm and a length of 10mm or more but not exceeding 400mm	PRC	55.4%