



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR TRADE AND ECONOMIC SECURITY

Brussels, 2 June 2025
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Taipei Representative Office
in the European Union
Square de Meeûs 26-27
B-1000 Brussels
By email

Subject: AD711 – Anti-dumping proceeding the imports of Epoxy resins originating in the People’s Republic of China, in the Republic of Korea, Taiwan and Thailand

Dear Sir, / Dear Madam,

The Directorate-General for Trade and Economic Security of the European Commission presents its compliments to the Mission of Taiwan to the European Union and has the honour to refer to the proceeding which the Commission is currently conducting with regard to imports into the European Union of **epoxy resins** originating in the People’s Republic of China, in the Republic of Korea, Taiwan and Thailand which was the subject of letter of 08 May 2025.

The European Commission has the honour to provide the Mission of Taiwan to the European Union with the additional disclosure of the definitive findings. These findings were also disclosed to the interested parties. The deadline for comments is 5 June 2025.

The Directorate-General for Trade and Economic Security of the European Commission takes this opportunity to renew to the Mission of Taiwan to the European Union the assurance of its highest consideration.

The present notification is provided in accordance with Article 5(11) of Regulation (EU) 2016/1036 of the European Parliament and the Council on protection against dumped imports from countries not members of the European Union and with Article 6.1.3 of the Agreement in Implementation of Article VI of the General Agreement on Tariffs and Trade 1994.

Lukas PEJCOCH
Head of Sector

Enclosure: Additional Final Disclosure Document



Annex I – Additional Final Disclosure Document

Following final disclosure on 8 May 2025, several interested parties provided comments which lead to a change in the dumping margin calculated for imports from the People's Republic of China ('China'). This document, which constitutes an additional final disclosure, lists these comments and the consequent changes to the dumping margins for China.

Dumping – China

a. Undistorted costs and benchmarks

Following the final disclosure, Sinochem Group, one of the sampled groups of exporting producers contested the use of the "4.2.3 22kV" voltage level in calculating electricity costs, citing evidence already provided during verification that its exporting producers are connected to the 110kV grid. Sinochem requested a revision to use the "4.2.1: 69 kV and over" voltage level instead.

The Commission accepted this claim and revised the electricity benchmark for the relevant sampled exporting producers accordingly.

Following the final disclosure, Sinochem Group contested the Commission's method of assigning the company specific electricity categories to peak and off-peak consumption and requested to reclassify certain categories.

The Commission accepted this claim and amended the electricity categories, where justified.

Following the final disclosure, Sanmu and Sinochem Group contested that the Commission considered as peak the entire electricity consumption of the companies which did not make a distinction between peak and off-peak consumption. Sanmu argued that there was available public information provided by the Thailand Board of Investment¹ on peak hours. On the other hand, Sinochem proposed to apply the average of peak and off-peak consumption based on the companies of its group which reported this information, to the company which did not report it.

The Commission examined this claim and concurred that, given the continuous 24-hour nature of the production process, it was reasonable to allocate electricity consumption in accordance with the Time-of-Use ("TOU") tariff. The schedule for peak hours under the TOU system is published by the Metropolitan Electricity Authority ("MEA")², which defines peak hours as running from 9:00 AM to 10:00 PM, Monday through Friday. This corresponds to 13 hours per day over five days per week (65 hours in 168 hour week), or approximately 38.7% of the total hours in a week.

Accordingly, for companies that did not provide a breakdown of electricity consumption by time period, the Commission allocated 38.7% of total electricity consumption as peak consumption. This proportion closely aligns with the share of peak consumption reported by companies that submitted detailed consumption data.

Based on these additional comments, the Commission recalculated the benchmark of electricity individually for each exporting producer in China.

The definitive dumping margins expressed as a percentage of the cost, insurance and freight (CIF) Union frontier price, duty unpaid, are as follows:

¹ https://www.boi.go.th/index.php?page=utility_costs

² <https://www.mea.or.th/en/our-services/tariff-calculation/other/-LDELdOY73W3K>

Company	Definitive dumping margin
Jiangsu Sanmu Group Co., Ltd.	17,3%
Sinochem group, consisting of – Jiangsu Ruiheng New Material Technology Co., Ltd. – Nantong Xingchen Synthetic Material Co., Ltd. – Jiangsu Kumho Yangnong Chemical Co., Ltd	33,0%
Other cooperating companies	23,0%
All other imports originating in China	33,0%