

1200 New Hampshire Avenue, NW  
Suite 725-B  
Washington, DC 20036

Tel: 202 483-0070  
Fax: 202 483-0092  
www.barnesrichardson.com

100 William Street, Suite 305  
New York, NY 10038  
Tel: 212 725-0200  
Fax: 212 889-4135

303 East Wacker Drive  
Suite 1020  
Chicago, IL 60601  
Tel: 312 565-2000  
Fax: 312 565-1782

June 26, 2020

## **Petitions Summary – Twist Ties from China**

### **I. INTRODUCTION**

This memorandum summarizes the Petitions by Bedford Industries, Inc., filed on June 26, 2020, with the U.S. Department of Commerce and the U.S. International Trade Commission, for the Imposition of Antidumping and Countervailing Duties on Twist Ties from China.

### **II. SCOPE OF THE INVESTIGATION**

The merchandise covered by these investigations consists of twist ties, which are thin, bendable ties for closing containers, such as bags, bundle items, or identifying objects. A twist tie is comprised of one or more metal wires encased in a covering material, which allows the tie to retain its shape and bind against itself. The metal wire in a twist tie is typically stainless or galvanized steel and typically measures between the gauges of 19 (.0410" diameter) and 31 (.0132") (American Standard Wire Gauge). A twist tie usually has a width between .075" and 1" in the cross-machine direction (width of the tie - measurement perpendicular with the wire); a thickness between .015" and .045" over the wire or other metal; and a thickness between .002" and .020" in areas without wire or other metal. Twist ties are commonly available individually in

pre-cut lengths (“singles”), wound in large spools to be cut later by machine or hand, or in perforated sheets of spooled or single twist ties that are later slit by machine or by hand (“gangs”).

The covering material of a twist tie may be paper (metallic or plain), plastic, or polyethylene, and can be dyed in a variety of colors with or without printing. A twist tie may have the same covering material on both sides or one side of paper and one side of plastic. When comprised of two sides of paper, the paper material is bound together with an adhesive or plastic. A twist tie also may have a tag or label attached to it or a pre-applied adhesive attached to it.

The scope includes ties used for television cable, computer cords, other appliances and household ties, all of which are manufactured by Petitioner. Twist ties without metal wire also are covered in the scope. An all plastic tie contains a plastic core as well as a plastic covering (the wing) over the core, just like paper and/or plastic in a metal tie. The scope does not include products with wire and plastic material (e.g., pipe cleaners used in craft activities, wire bristle brushes), or plastic “zip” ties.

The twist tie dimensions included within the scope definition cover the majority of the unfair competition encountered by the Petitioner from the subject countries. Petitioner’s intention is that the scope would cover the importation of twist ties alone (and would not include when the twist ties are imported within a packaging for an item such as a cable television or a box of garbage bags).

### **III. U.S. TARIFF CLASSIFICATION**

Twist ties are imported into the United States under Harmonized Tariff System of the United States (“HTSUS”) subheadings 8309.90.0000 and 5609.00.3000. Subject merchandise may also enter under HTSUS subheadings 3906.90.2000, 3920.51.5000, 3923.90.0080, 3926.90.9990,

4811.59.6000, 4821.10.4000, 4821.90.2000, and 4823.90.8600. These HTSUS subheadings are provided for reference only. The written description of the scope of the investigations is dispositive.

#### **IV. PETITIONER**

Bedford Industries, Inc.

1659 Rowe Ave Worthington, Minnesota 56187

Telephone: 1(507) 376-4136

Facsimile: 1 (507) 376-8297

Website: <https://www.bedford.com/bendable>

The Petitioner Bedford Industries, Inc. is a company that produces the domestic like product in the United States. Accordingly, the Petitioner is a domestic interested party within the meaning of 19 U.S.C. § 1677(9) and 19 C.F.R. § 351.102(b). The Petitioner accounts for the majority of twist ties produced in the United States.

#### **V. NAMED PRODUCERS/EXPORTERS**

Please contact our office for a list of Chinese Producers and Exporters of Twisted Ties.

#### **VI. NAMED IMPORTERS**

Please contact our office for a list of U.S. Importers of Twisted Ties.

#### **VII. ALLEGED DUMPING MARGIN**

67.92%

### **VIII. ALLEGED SUBSIDIES**

- The 12th Five-Year Plan for National Economic and Social Development of the People's Republic of China
- The 13th Five-Year Plan for Economic and Social Development of the People's Republic of China (2016-2020)
- The 12th Five-Year Plan (2011-2015) of Guangdong Province
- Zhejiang Province's "Report on the Work of the Government"