



HARMONIZED SYSTEM  
REVIEW SUB-COMMITTEE

NR0126E1  
(+ Annex)

-  
22<sup>nd</sup> Session  
-

O. Eng.

Brussels, 2 August 2000.

## AMENDMENT OF THE EXPLANATORY NOTE TO HEADING 40.10

(Item III.A.2 on Agenda)

### Reference documents :

41.558	(RSC/16)	NR0074B1	(RSC/21)
41.580	Annexes A/5 and D/4 (RSC/16 - Report)	NR0101E2	Annexes B/1 (paragraphs 11 to 14) and E/1 (RSC/21 - Report)
41.920	Annex A/1 (RSC/17 - Report)		
42.100	Annexes F/1, N/1 and N/2 (HSC/21 - Report)	NC0250E2	Annexes F/1 (paragraphs 20 to 23) and L/7 (HSC/25 - Report)
NR0054B1	(RSC/20)		
NR0072E2	Annexes C (paragraph 40) and D/7 (RSC/20 - Report)	NR0108E1	(RSC/22)

### I. BACKGROUND

1. After preparation of Doc. NR0108E1, the Secretariat received a submission from Canada on 7 July 2000 in respect of amendments of the Explanatory Note to heading 40.10. The Canadian submission is reproduced in the Annex to this document.

### II. SECRETARIAT COMMENTS

2. The Canadian submission explains the background of the question and analyses the question concerning belts having both longitudinal and transverse grooves using diagrams. Canada has also indicated their concerns and made a proposal with comments for further consideration and examples of V-belts.
3. According to Canada's concerns indicated in paragraphs 26 to 28 of the submission, Canada now feels that the text they proposed, currently found in square brackets in the Secretariat's old proposal as set out in the Annex to Doc. NR0108E1, incorrectly describes a V-ribbed belt with transverse grooves. Canada is now of the view that such belts with longitudinal and also transversal grooves should fall within the category of those V-belts that are not V-ribbed.

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4. As indicated in paragraph 11 of Doc. NR0108E1, the Secretariat holds the view that those belts with longitudinal and also transversal grooves would still be covered by the ISO 1081 definition for V-ribbed belts, since they are longitudinally ribbed. However, since Canada's new view seems to involve a classification issue, in the context of the subheadings of heading 40.10 in the 2002 version of the HS, the Sub-Committee is invited to take a decision as to whether this is a matter should again be referred to the Harmonized System Committee.
5. While suggesting the adoption of the proposal made by the United States at the 21<sup>st</sup> Session of the Review Sub-Committee (see paragraphs 12 and 29 of the submission), Canada has also expressed concerns about referring specifically to longitudinal and transverse grooves and proposes as an alternative to replace "Grooves" at the beginning of the first sentence in the present antepenultimate paragraph with "Regardless of orientation, grooves". Therefore, the paragraph would read as follows :

"Regardless of orientation, grooves (whether moulded or cut) in V-belts or belting reduce bending stress and help dissipate the heat from rapid flexing; this is especially important on drives where the belts run over small sheaves at high speeds. [These grooves, which are present in only certain types of V-belts or V-belting, do not affect classification.]"
6. In this connection, the Secretariat would point out that the last sentence of this paragraph seems to contradict Canada's concerns indicated in paragraph 3 above and has therefore placed this sentence in square brackets.

### III. CONCLUSION

7. The Sub-Committee is invited to take account of the submission of Canada as set out in the Annex to this document and the Secretariat's comments (paragraphs 2 to 6 above) when examining Doc. NR0108E1.

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**Canadian Submission: Amendment of the Explanatory Note to heading 40.10**

**I - Background**

1. In 2002 specific provisions will be made for “V-ribbed” endless transmission belts (new subheadings 4010.31 and 4010.33) separate from other V-belts.
2. The existing Explanatory Note to heading 40.10 (page 639, fourth paragraph) describes V-belts as those having a trapezoidal cross-section (see Section VI for examples of V-Belts).
3. The note explains that V-belts may have, in cross-section, a single trapezoidal shape, trapezoidal shapes on opposite sides or two or more trapezoidal shapes on the same side; diagrams are provided for each example.
4. The sixth, and antepenultimate paragraph, of that Explanatory Note discusses the function of the grooves in V-belts and states that such grooves do not affect classification.
5. The International Standards Organization describes a V-ribbed belt as “...an endless belt with a longitudinally ribbed traction surface which engages and grips, by friction, pulley grooves of similar shape” [ISO 1081].
6. V-ribbed belts are formed either by binding together two or more V-belts or by the introduction of longitudinal grooves (whether moulded or cut) into a V-belt. In both cases, the result is a belt with continuous longitudinal ribs.
7. The Review Sub-Committee, at its 16<sup>th</sup> Session, asked the Secretariat to prepare a proposal to insert a description of V-ribbed belts, excerpted from ISO 1081, in the Explanatory Note to heading 40.10.
8. The Review Sub-Committee, at the 17<sup>th</sup> Session, accepted the Secretariat’s proposal that the antepenultimate paragraph of the Explanatory Note to heading 40.10 be replaced by the following :

A V-ribbed belt is an endless belt with a longitudinally ribbed traction surface which engages and grips, by friction, pulley grooves of similar shape. The grooves (whether moulded or cut) in V-ribbed belts or belting reduce bending stress and help dissipate the heat from rapid flexing; this is especially important on drives where the belts run over small sheaves at high speeds.

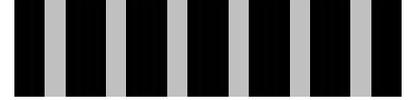
9. At the 21<sup>st</sup> Session of the Harmonized System Committee, Canada presented a sample of a V-ribbed belt with transverse grooves. We questioned whether the proposed amendment to Explanatory Note 40.10 made provision for such goods and suggested that “(and possibly also transversally)” be added following “longitudinally” in the proposed amendment. The Committee agreed to place the text in square brackets for consideration at the next session.
10. At the 20<sup>th</sup> Session of the Review Sub-Committee the United States proposed alternative wording to replace the antepenultimate paragraph. The Sub-Committee agreed to place both texts in square brackets for discussion at its next session.
11. At the 21<sup>st</sup> Session of the Review Sub-Committee, the United States advised that trade circles had confirmed the existence of transversally ribbed V-belts. They also stated that example (C), on page 639 of the current Explanatory Note to heading 40.10, represents a type of ribbed V-belt.
12. With a view to simplifying the amendments to the Explanatory Note the United States presented an alternative to their previous proposal. It suggested the existing Explanatory Note be modified by inserting “(V-ribbed belts)” following the text in the existing example (C) and replacing “Grooves” with “Longitudinal or transverse grooves” at the beginning of the first sentence of the antepenultimate paragraph.
13. The Sub-Committee agreed to delete the initial proposal by the United States, and to submit to the Harmonized System Committee two alternatives; namely, the Secretariat text (maintaining “and possibly also transversally” in square brackets) and the revised United States proposal.
14. At the 25<sup>th</sup> Session of the Harmonized System Committee the issue was discussed and it was agreed to send the question to the review Sub-Committee for further consideration.

## **II - Analysis**

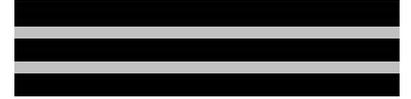
15. Canada agrees with the position of the United States delegate at the 21<sup>st</sup> Session of the Review Sub-Committee that example (C) describes V-ribbed belts.
16. Trade circles have confirmed that V-ribbed transmission belts, as well as some other V-belts, may have transverse grooves.
17. Use of the terms “rib(s)” or “ribbed” can cause confusion in describing goods.
18. The term “rib” is defined as a long raised piece often of stronger or thicker material across a surface (The Concise Oxford).

NOTE : The perspective in all the diagrams that follow is from above the traction surface of the belt; raised surfaces are shown in black and grooves are shown in grey.

19. A V-belt with transverse “ribs” has a regular pattern of raised surfaces resulting from the grooves.

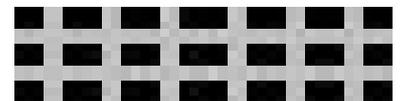


20. A V-ribbed belt of the type described by example (C) in the existing Explanatory note to heading 40.10 has raised surfaces running longitudinally, resulting from the corresponding grooves.

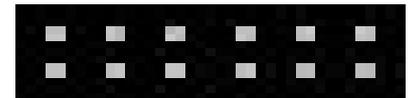


21. Difficulty arises when trying to describe belts, such as that presented by Canada at the 21<sup>st</sup> Session of the Harmonized System Committee (see paragraph 8 above).

22. The addition of transverse grooves to a V-ribbed belt (paragraph 20 above) produces a belt with a pattern of raised rectangles as the longitudinal ribs are broken by the transverse grooves. In cross-section it would be recognizable as a V-ribbed belt as the longitudinal grooves remain unaltered.



23. The addition of transverse ribs to a V-ribbed belt (paragraph 20 above) produces a flat belt with a pattern of depressions (shown in grey). In cross-section it would be more akin to a V-belt, with a pattern of molded or cut depressions, as the longitudinal grooves are blocked at regular intervals by the transverse ribs.



24. The text in square brackets in the Secretariat proposal describes belts of the type described in paragraph 23 (immediately above). The goods intended to be described are those of the type described in paragraph 22 (second above).

25. Belts of the type presented by Canada at the 21<sup>st</sup> Session of the Harmonized System Committee can be described as having both longitudinal and transverse grooves but cannot, as we suggested at that time, be properly described as having both longitudinal and transverse ribs.

### **III - Concerns**

26. The Secretariat’s proposed amendment to the antepenultimate paragraph of the Explanatory Note refers only to V-ribbed belts. It makes no provision for other V-belts (i.e., “non-ribbed”) which may also have transverse grooves.

27. Canada now feels that the text we proposed, currently found in square brackets in the Secretariat’s proposed amendment, incorrectly describes a V-ribbed belt with transverse grooves (see paragraphs 21 to 24 above).

28. Because the Secretariat's proposed amendment includes no reference to the existing example (C), it could reasonably be interpreted that belts of the type shown in that example are not V-ribbed belts. This ambiguity could lead to classification errors.

#### **IV - Proposal**

29. Canada suggests adoption of the proposal made by the United States at the 21<sup>st</sup> Session of the Review Sub-Committee (see paragraph 12 above).
30. Those minimal changes properly describe V-ribbed belts, address the question of transverse grooves in all V-belts and retain the overall integrity of the description of V-belts.
31. In the alternative, the Secretariat's proposed amendment must be modified to better describe the goods, to extend the description of the grooves to all V-belts and to take into consideration the existing example (C).

**V - For further consideration**

32. Synchronous belts are being produced with helical grooves (diagonal grooves starting at each edge and meeting in the middle).

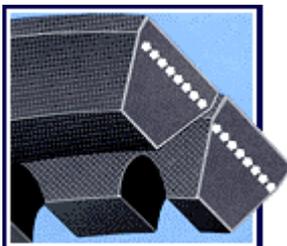


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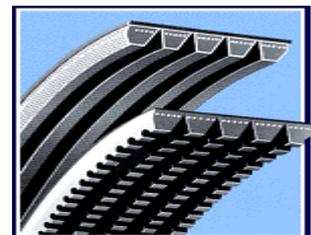
33. We have been unable to determine whether this style of grooves will be used with V-belts any time soon, if ever.
34. However, both the proposed amendments under consideration refer specifically to longitudinal and transverse grooves; therefore, they would not apply to a V-belt with any pattern of grooves other than longitudinal and transverse.
35. An alternative would be to replace “Grooves” at the beginning of the first sentence in the existing antepenultimate paragraph with “Regardless of orientation, grooves” rather than making reference to any specific directions or patterns.

**VI - Examples of V-belts**



**V-Belts**

Standard & Transversely Grooved



**V-Ribbed Belts**

Standard & Transversely Grooved