



SG 2021 ER

OTTAWA, September 9, 2021

STATEMENT OF REASONS

Concerning an expiry review determination
under paragraph 76.03(7)(a) of the *Special Import Measures Act* respecting

THE DUMPING AND SUBSIDIZING OF STEEL GRATING FROM CHINA

DECISION

On August 26, 2021, pursuant to paragraph 76.03(7)(a) of the *Special Import Measures Act*, the Canada Border Services Agency determined that the expiry of the order made by the Canadian International Trade Tribunal on April 18, 2016, in Expiry Review No. RR-2015-001:

- i. is likely to result in the continuation or resumption of dumping of certain steel grating originating in or exported from China; and
- ii. is likely to result in the continuation or resumption of subsidizing of certain steel grating originating in or exported from China.

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EXECUTIVE SUMMARY

[1] On March 29, 2021, the Canadian International Trade Tribunal (CITT), pursuant to subsection 76.03(3) of the *Special Import Measures Act* (SIMA), initiated an expiry review of its order made on April 18, 2016, in Expiry Review No. RR-2015-001, concerning the dumping and subsidizing of certain steel grating originating in or exported from China.

[2] As a result of the CITT's notice, on March 30, 2021, the Canada Border Services Agency (CBSA) initiated an expiry review investigation to determine, pursuant to paragraph 76.03(7)(a) of SIMA, whether the expiry of the order is likely to result in the continuation or resumption of dumping and/or subsidizing of the subject goods.

[3] The CBSA received responses to its Canadian Producer Expiry Review Questionnaire (ERQ) from Borden Metal Products (Canada) Ltd. (Borden Gratings)¹ and Fisher & Ludlow Ltd. (Fisher & Ludlow)², major producers of steel grating in Canada. The submissions made by Borden Gratings and Fisher & Ludlow included information supporting their position that continued or resumed dumping and subsidizing of steel grating from China is likely if the CITT's order is rescinded.

[4] The CBSA did not receive any responses to the Importer ERQ or the Exporter ERQ. The CBSA also did not receive a response to the Foreign Government ERQ from the Government of China (GOC).

[5] Fisher & Ludlow provided a case brief³ to the CBSA in support of its position that continued or resumed dumping and subsidizing of steel grating from China is likely if the CITT's order is rescinded. No other party provided a case brief to the CBSA and no party provided a reply submission in response to the Fisher & Ludlow case brief.

¹ Exhibit 13 (PRO) & 14 (NC) - Partial response to expiry review questionnaire (ERQ) from Borden Metal Products (Canada) Ltd.

² Exhibit 16 (PRO) & 17 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L").

³ Exhibit 24 (PRO) & 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L").

[6] Analysis of information on the administrative record indicates a likelihood of continued or resumed dumping into Canada of certain steel grating originating in or exported from China should the CITT's order be rescinded. This analysis relied upon the following factors:

- continued dumping of certain steel grating while the CITT order was in effect and the inability of Chinese exporters to compete at non-dumped prices
- production capacity and export-orientation of steel grating producers in China
- decline of Canadian oil and gas, construction and manufacturing sectors leading to decreased demand for steel grating
- continued weakening in domestic demand for steel in China leading to an increasing reliance on export markets
- anti-dumping measures concerning Chinese steel grating in the United States and Turkey

[7] In addition, analysis of information on the administrative record indicates a likelihood of continued or resumed subsidizing of certain steel grating originating in or exported from China should the CITT's order be rescinded. This analysis relied upon the following factors:

- continued subsidizing of steel grating while the order was in effect
- current countervailing measures concerning Chinese steel grating in the U.S. and other Chinese steel products in Canada

[8] For the forgoing reasons, the CBSA, having considered the relevant information on the record, determined on August 26, 2021, pursuant to paragraph 76.03(7)(a) of SIMA that the expiry of the order in respect of certain steel grating originating in or exported from China is likely to result in:

- the continuation or resumption of dumping of the goods into Canada; and
- the continuation or resumption of subsidizing of the goods exported to Canada.

BACKGROUND

[9] On September 20, 2010, following a complaint filed by Fisher & Ludlow, the CBSA initiated an investigation regarding the dumping and subsidizing of metal bar grating of carbon, alloy or stainless steel originating in or exported from China. The complaint was supported by Borden Gratings.

[10] On March 21, 2011, the CBSA made final determinations of dumping and subsidizing concerning these goods.

[11] On April 19, 2011, the CITT issued an injury finding in Inquiry No. NQ-2010-002 respecting carbon steel bar grating and alloy steel bar grating from China. At that time, the CITT also found that the volume of dumped and subsidized stainless steel grating was negligible and terminated its inquiry regarding those goods.

[12] On July 14, 2015, the CBSA concluded a re-investigation to update the normal values, export prices, and amounts of subsidy of certain steel grating from China. Neither the exporters nor the GOC participated in the re-investigation. Imports of subject goods from all exporters are therefore subject to a ministerial specification pursuant to subsection 29(1) of SIMA, which specifies that the normal value shall be determined based on the export price plus an amount equal to 85% of that export price, resulting in anti-dumping duties equal to 85% of the export price. Imports of subject goods from all exporters are also subject to countervailing duties equal to 13,064 Renminbi per metric tonne, in accordance with the ministerial specification made under subsection 30.4(2) of SIMA.

[13] On June 23, 2015, the CITT issued a notice concerning the expiry of its finding, which was scheduled to occur on April 18, 2016. Based on the information filed during the expiry process, the CITT decided that a review of the finding was warranted. On August 12, 2015, pursuant to subsection 76.03(3) of SIMA, the CITT gave notice and initiated an expiry review of its finding made on April 19, 2011.

[14] On April 18, 2016, the CITT continued its finding in respect of the dumping and subsidizing of steel grating originating or exported from China.

[15] On February 5, 2021, the CITT issued a notice concerning the expiry of its order, which was scheduled to occur on April 17, 2021. Based on the information filed during the expiry process, the CITT decided that a review of the order was warranted. On March 29, 2021, pursuant to subsection 76.03(3) of SIMA, the CITT gave notice and initiated an expiry review of its order made on April 18, 2016.

[16] On March 30, 2021, the CBSA commenced an expiry review investigation to determine whether the expiry of the order is likely to result in continued or resumed dumping and/or subsidizing of the goods from China.

PRODUCT DEFINITION

[17] The goods subject to this expiry review investigation are defined as:

“Carbon steel bar grating and alloy steel bar grating, consisting of load-bearing pieces and cross pieces, produced as standard grating or heavy-duty grating, in panel form, whether galvanized, painted, coated, clad or plated, originating in or exported from the People’s Republic of China.”

[18] The subject goods can be referred to as “metal bar grating”, “steel grating” or simply “bar grating”. The goods are sold in “panel” or “mat” form, produced as either standard bar grating or heavy-duty bar grating. Standard bar grating is manufactured in Canada according to American National Standards Institute (ANSI) and National Association of Architectural Metal Manufacturers (NAAMM) MBG 531 specifications with maximum bearing bar thickness of 3/16 inches (4.76 millimeters (mm)). Heavy duty bar grating is made according to ANSI/NAAMM MGB 532 specifications with maximum bearing bar thickness of 3/8 inches (9.53 mm).

[19] The “mats” or “panels” are typically made in standardized sizes and the most common panel size is 3 feet (.91 meters) wide by 24 feet (7.32 meters) long. In accordance with the ANSI/NAAMM specifications referred to, the size of the bearing bars usually ranges from 1/8”(3.18 mm) thickness and 3/4”(19.05 mm) in depth (width) to 3/8”(9.53 mm) thickness and 5”(127 mm) in depth (width), depending on the load requirements.

[20] In addition to ANSI/NAAMM specifications, the subject goods may be produced to other recognized standards, such as Chinese, U.K. and Australian specifications.

[21] The subject goods may be imported and sold even if not made or certified to the ANSI/NAAMM or other recognized standards. Non-certified product includes secondary material or other kinds of “non-spec” grating. These goods lack the requisite mill tests or other proof of compliance with international standards.

[22] The subject goods do not include: (1) expanded metal grating comprised of a single piece or coil of sheet or thin plate steel that has been slit and expanded and not consisting of welding or joining of multiple pieces of steel; and (2) plank-type safety grating comprised of a single piece or coil of sheet or thin plate steel, typically in thickness of 10 to 18 gauge, pierced and cold formed and without welding or joining of multiple pieces of steel.

[23] Subject goods produced by different manufacturing processes (welding, hydraulic pressing or riveting) are fully interchangeable. Hydraulically-produced or riveting-produced gratings are substitutable in every respect for grating produced by welding processes and vice-versa. They have the same or comparable physical and mechanical properties in accordance with the international standards and specifications described earlier.

[24] Subject goods have a multitude of load-bearing end uses, including industrial flooring, walkways, mezzanines, stairways, trenches, highway signs platforms and fire escapes. Primary markets are large-scale oil production structures and systems, electric power generating plants, steel mills, cement plants, saw mills, pulp and paper mills, mining, automotive plants and other industrial facilities. Although primarily used in large industrial projects, commercial and residential applications for these goods are also commonplace.

CLASSIFICATION OF IMPORTS

[25] Steel grating is normally imported into Canada under the following Harmonized System (HS) classification numbers:

7308.90.00.10	7308.90.00.40	7308.90.00.95
7308.90.00.20	7308.90.00.50	7308.90.00.96
7308.90.00.30	7308.90.00.60	7308.90.00.99

[26] This listing of tariff classification numbers is for convenience of reference only. The tariff classification number provided may include goods that are not subject goods and subject goods may be imported into Canada under tariff classification numbers other than those provided. Refer to the product definition for authoritative details regarding the subject goods.

PERIOD OF REVIEW

[27] The period of review (POR) for the CBSA's expiry review investigation is January 1, 2018, to December 31, 2020.

CANADIAN INDUSTRY

[28] The Canadian industry for steel grating is comprised of Borden Metal Products (Canada) Ltd. and Fisher & Ludlow Ltd.

Borden Metal Products (Canada) Ltd.

[29] Borden Gratings has been involved in the manufacture of pressure locked and riveted grating gratings at its plant in Beeton, Ontario since 1955. Borden Gratings has shifted its focus to fabricating grating as opposed to manufacturing grating.⁴

Fisher & Ludlow Ltd.

[30] Fisher & Ludlow was established in 1954 as a grating manufacturer in Burlington, Ontario. The company was purchased by Harris Steel in 1976. In March 2007, Harris Steel was purchased by Nucor Corporation. Its Wetaskiwin, Alberta plant produces standard grating.⁵

CANADIAN MARKET

[31] The imports of certain steel grating during the POR are presented in **Table 1** below. The CBSA cannot release specific quantitative data respecting the value and volume of Canadian production of steel grating sold for domestic consumption as it would lead to the disclosure of confidential information.

Table 1
Imports of Steel Grating During the POR⁶
(Value in \$)

Source	2018	2019	2020
	Value	Value	Value
China	671,924	3,292,490	3,956,050
All Other Countries	1,202,908	2,380,907	999,636
Total Imports	1,874,832	5,673,397	4,955,686

⁴ Exhibit 14 (NC) - Response to expiry review questionnaire (ERQ) from Borden Metal Products (Canada) Ltd., Question Q8.

⁵ Exhibit 17 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q8.

⁶ Exhibit 22 (NC) - CBSA import and compliance statistics for the period of review - Day 50.

[32] The import data collected by the CBSA does not reflect standard reporting for quantities. As such, importers may report volume in a number of different units of measurement. In light of the wide variety of products included in the product definition, the import quantities shown on the CBSA import documents were often expressed in different units of measure, such as metric tonnes, number of pieces, etc. Accordingly, the CBSA data could not be used to calculate total volume or perform any meaningful calculations of unit value.

Canadian Production

[33] The Canadian producers' share of the apparent Canadian market decreased over each year of the POR.

Imports

[34] Information on imports of steel grating from various countries is detailed in Table 1 above.

[35] The total imports of subject goods from China in terms of value increased as a percent of the total value of the apparent Canadian market over each year of the POR. Over the same period, Canadian production dropped, showing that the Chinese imports have been gaining market share to the detriment of Canadian production. Imports from other countries grew from 2018 to 2019 before returning to lower levels in 2020.

ENFORCEMENT DATA

[36] In the enforcement of the CITT's order during the POR, as detailed in **Table 2** below, the total amount of anti-dumping and countervailing duty collected on subject imports from China was approximately CAD \$1.6 million. By comparison, the value for duty of all subject imports from China during the POR was approximately CAD \$7.9 million.⁷

Table 2
Enforcement data for the period of review⁸

	2018	2019	2020	POR
Value for Duty of Subject Goods	\$671,924	\$3,292,490	\$3,956,050	\$7,920,464
SIMA Duty Assessed	\$0	\$553,767	\$1,084,484	\$1,638,251

⁷ Exhibit 22 (NC) - CBSA import and compliance statistics for the period of review - Day 50.

⁸ Ibid.

PARTIES TO THE PROCEEDINGS

[37] On March 30, 2021, a notice concerning the initiation of the expiry review investigation and the ERQs were sent to the known Canadian producers, importers and exporters. The GOC was also sent an ERQ relating to subsidy.

[38] The ERQs requested information relevant to the CBSA's consideration of the expiry review factors, as listed in subsection 37.2(1) of the *Special Import Measures Regulations* (SIMR).

[39] Borden Gratings and Fisher & Ludlow participated in the expiry review investigation and responded to the producer ERQ. Additional documents were also filed on behalf of Fisher & Ludlow prior to the closing of the record.⁹

[40] Fisher & Ludlow provided a case brief¹⁰ to the CBSA in support of its position that continued or resumed dumping and subsidizing of certain steel grating from China is likely if the CITT's order is rescinded.

[41] No importer or exporter provided a response to the CBSA's ERQs or otherwise participated in the expiry review.

[42] The GOC did not provide a response to the CBSA's ERQ nor did it submit a case brief or reply submission.

INFORMATION CONSIDERED BY THE CBSA

Administrative Record

[43] The information considered by the CBSA for purposes of this expiry review investigation is contained in the administrative record. The administrative record includes the information on the CBSA's exhibit listing, which is comprised of the CITT's administrative record relating to the initiation of the expiry review, the CBSA's exhibits and information submitted by interested parties, including information which the interested parties feel is relevant to the decision as to whether dumping and subsidizing are likely to continue or resume, if the CITT's order is allowed to expire. This information may consist of expert analysts' reports, excerpts from trade magazines and newspapers, orders and findings issued by authorities of Canada or of a country other than Canada, documents from international trade organizations such as the World Trade Organization and responses to the ERQs submitted by the Canadian producers, exporters, importers and governments.

⁹ Exhibit 19 (PRO) & 20 (NC) - Additional information to the response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L").

¹⁰ Exhibit 24 (PRO) & 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L").

[44] For purposes of an expiry review investigation, the CBSA sets a date after which no new information submitted by interested parties will be placed on the administrative record or considered as part of the CBSA's investigation. This is referred to as the "closing of the record date." This allows participants time to prepare their case briefs and reply submissions based on the information that is on the administrative record as of the closing of the record date. For this investigation, the administrative record closed on May 19, 2021.

POSITION OF THE PARTIES – DUMPING

Parties Contending that Continued or Resumed Dumping is Likely

[45] Fisher & Ludlow made representations through its ERQ response as well as in its case brief in support of its position that the dumping of certain steel grating from China is likely to continue or resume should the CITT's order be rescinded. Consequently, Fisher & Ludlow argue that the anti-dumping measures should remain in place.

[46] The main arguments made by the Canadian producers can be summarized as follows:

- substantial steel grating capacity of producers in China
- decline in the Canadian oil and gas, construction and manufacturing sectors in Western Canada
- continued weakening in domestic demand for steel grating in China leading to an increasing reliance on export markets
- anti-dumping measures concerning Chinese steel grating in the United States and other Chinese steel products in Canada

Substantial steel grating capacity of producers in China

[47] Fisher & Ludlow contends that the capacity of Chinese steel grating producers exceeds the size of the Canadian market.¹¹

[48] Fisher & Ludlow provided website sources which demonstrate that a large number of Chinese producers and exporters offer a wide range of steel grating for export sale¹²:

- www.made-in-china.com reveals a total of 593 Chinese steel grating manufacturers and suppliers. Narrowing the search down to "standard steel grating" turns up a list of 405 Chinese grating manufacturers and suppliers.
- www.alibaba.com lists hundreds of additional Chinese grating producers and suppliers.
- www.globalsources.com shows 58 Chinese steel grating manufacturers and suppliers.

¹¹ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 13.

¹² Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 20.

[49] Fisher & Ludlow stated that the large number of Chinese steel grating producers and exporters, as well as their large scale of production, would easily overwhelm the Canadian industry should the order expire.¹³

[50] Listed below are several examples of Chinese steel grating producers and their corresponding annual production capacities¹⁴ provided by Fisher & Ludlow:

- Ningbo Jiulong Machinery Manufacturing Co., Ltd. – 100,000 tons
- Shanghai Klemp Metal Products Co., Ltd. – 15,000 tons
- Yantai Xinke Steel Structure Co., Ltd. – 50,000 tons
- Yantai Wanjie New Materials Co., Ltd. – 20,000 tons
- Wuxi Royce Grating Machinery Manufacturing Co., Ltd. – 60,000 tons

[51] Fisher & Ludlow argued that the Canadian market size is miniscule in comparison with Chinese steel grating production capacity.¹⁵ In its injury finding in 2010, the United States International Trade Commission (USITC) estimated total Chinese steel grating capacity at over 2 million short tons - or 1.8 million metric tonnes per annum.¹⁶

Decline of Canadian oil and gas, construction and manufacturing sectors in Western Canada

[52] Fisher & Ludlow observed that the demand for steel grating in Canada has declined in the past five years due to poor economic conditions and changes in demand for oil and gas in Western Canada during the same time period. In 2020, Western Canada's demand for steel grating dropped more than 30% due to low oil prices and reduced construction and infrastructure spending.¹⁷

[53] Fisher & Ludlow contends that the Canadian oil sector has been in crisis since the collapse of oil prices began in 2014-2015 and that the COVID-19 pandemic has exacerbated this situation. The COVID-19 pandemic resulted in numerous layoffs, closures, and restrictions on travel, which impacted the global demand for oil. These circumstances have caused oil and gas sector companies to cut costs, created an imperative to source low-cost materials for existing projects, deferred or reduced capital expenditures, increased the sale of assets, and/or have given rise to cancellation of pipeline projects.¹⁸

[54] The slowdown in the oil and gas industry, measured in terms of capital spending and construction projects, affects the demand for steel grating in Canada. In this environment, domestic producers of steel grating are particularly vulnerable to low-priced import competition as capital projects seek to reduce their material costs for commodity construction materials such as steel grating.¹⁹

¹³ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 20.

¹⁴ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 13.

¹⁵ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 14.

¹⁶ Exhibit 16 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q28.

¹⁷ Exhibit 16 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q22.

¹⁸ Exhibit 16 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q23.

¹⁹ Ibid.

[55] The strength of the manufacturing sector also impacts the demand for steel grating - Canada's manufacturing sector was on a decline at the end of 2019 and the pandemic only worsened the decline in the performance of this sector. Manufacturing sales dropped in Q4 2020. Capital expenditures in non-residential construction and machinery and equipment were down 9.5% from 2019. All non-residential sectors reported declines in December 2020, and most notably in connection with steel grating was a decline in the industrial sector of 24.4%. The decrease in capital spending and construction has negatively affected the demand for steel grating.²⁰

Continued weakening in domestic demand for steel grating in China

[56] Fisher & Ludlow referred to the evidence on the record concerning demand conditions in China. China's domestic consumption accounted for only 55% of its GDP in 2019 and 54.3% in 2020. In Q2 2019, China's economic growth slowed to a 27 year low at 6.2%.²¹

[57] Demand in the commercial and industrial construction sectors in China can be used as a proxy for local steel grating demand because steel grating is a construction input. In March 2020, GlobalData projected construction sector growth for North-East Asia in 2020 to slow to 1.0% and to -1.2% for South and South-East Asia.²²

[58] As a result of COVID-19, as of September 2020, China's building industry was expected to record a period of negative to low growth over the next eight quarters.²³ The slow growth in the building and construction industry in China and other Asian markets will likely reduce demand for steel grating in China.

Anti-dumping measures concerning Chinese steel grating in the United States and other Chinese steel products in Canada

[59] Fisher & Ludlow submitted information regarding USITC's extension of its order in the five-year sunset review concerning steel grating from China on May 7, 2021. The USITC found that the revocation of the orders would likely lead to a "significant volume of subject imports that would likely significantly undersell the domestic like product, leading subject imports to gain market share and/or have price-depressing or suppressing effects on the domestic like product." Fisher & Ludlow claims that the order provides evidence that Chinese steel grating exporters continue to exhibit a propensity to sell dumped goods in North American markets.²⁴

²⁰ Exhibit 16 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q23.

²¹ Exhibit 16 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q29.

²² Ibid.

²³ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 19.

²⁴ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., paras. 24-25.

[60] Fisher & Ludlow also listed several other recent anti-dumping orders on Chinese steel products from Canada,²⁵ such as:

- Fabricated Industrial Steel Components
- Sucker Rods
- Steel Piling Pipe
- Hot-Rolled Steel Plate 3
- Carbon Steel Welded Pipe
- Concrete Reinforcing Bar

[61] Fisher & Ludlow states that these cases demonstrate “that the Canadian market remains an attractive market for dumped [...] steel products and is further evidence that Chinese producers and exporters will continue to resort to dumped pricing to capture market share despite various trade remedy orders.”²⁶

Parties Contending That Continued or Resumed Dumping is Unlikely

[62] None of the parties contended that continued or resumed dumping of subject goods from China is unlikely should the CITT’s order expire.

CONSIDERATION AND ANALYSIS - DUMPING

[63] In making a determination under paragraph 76.03(7)(a) of SIMA whether the expiry of the order is likely to result in the continuation or resumption of dumping of the goods, the CBSA may consider factors identified in subsection 37.2(1) of the SIMR, as well as any other factors relevant in the circumstances.

[64] Guided by the aforementioned factors and having considered the information on the administrative record, the following list represents a summary of the factors analyzed by the CBSA in conducting this expiry review investigation with respect to dumping:

- continued dumping of certain steel grating while the CITT order was in effect and the inability of Chinese exporters to compete at non-dumped prices
- production capacity and export-orientation of steel grating producers in China
- decline of Canadian oil and gas, construction and manufacturing sectors leading to decreased demand for steel grating
- continued weakening in domestic demand for steel in China leading to an increasing reliance on export markets
- anti-dumping measures concerning Chinese steel grating in the United States and Turkey

[65] As mentioned earlier in this report, the CBSA received ERQ responses from two Canadian producers. One of the responding Canadian producers, Fisher & Ludlow, also submitted supplementary information prior to the closing of the record. Case briefs were also

²⁵ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 45.

²⁶ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 46.

filed on behalf of Fisher & Ludlow. The CBSA did not receive ERQ responses from any importers, exporters or producers of subject goods or from the GOC. The CBSA relied on the ERQ responses and information submitted by these parties, as well as the other information on the administrative record for purposes of this expiry review investigation.

Continued dumping of certain steel grating while the CITT order was in effect and the inability of Chinese exporters to compete at non-dumped prices

[66] Information on anti-dumping duties collected during the POR is presented in the *Enforcement Data* section. Importations of certain steel grating from China have resulted in the assessment of anti-dumping and countervailing duties of approximately 1.6 million dollars on 100% of the subject goods imported into Canada from China during the POR.²⁷

[67] Although imports of subject goods into Canada have declined substantially since anti-dumping duties were first imposed, low volumes continued to be imported during the POR. The value of subject goods from China represents a relatively small proportion of the total Canadian market during the POR. The small volume of imports since the anti-dumping duties of 85% of the export price were imposed is an indicator that Chinese steel grating cannot be sold in the Canadian market at non-dumped prices. It is also an indication that exporters in China have a continued interest in the Canadian market.

[68] On July 14, 2015, the CBSA concluded a re-investigation to update the normal values, export prices, and amounts of subsidy of certain steel grating from China. Neither the exporters nor the GOC participated in the re-investigation. Imports of subject goods from all exporters are therefore subject to a ministerial specification pursuant to subsection 29(1) of SIMA, which specifies that the normal value shall be determined based on the export price plus an amount equal to 85% of that export price, resulting in anti-dumping duties equal to 85% of the export price. The lack of exporter participation suggests that there was no incentive to provide information to the CBSA as the exporters are unable to sell to Canadian importers at non-dumped prices.

Production Capacity and export-orientation of steel grating producers in China

[69] There are a large number of steel grating producers in China. Information on the record identifies website sources listing hundreds of producers and exporters that offer a wide range of steel grating for export sale.

[70] The record also contains information on the production capacities of steel grating producers in China. For example, Ningbo Jiulong Machinery Manufacturing Co. Ltd.'s production capacity for steel grating is 100,000 tons²⁸ and exports approximately half of its production to destinations such as North America.²⁹ Yantai Xinke Steel Structure Co. Ltd., a

²⁷ Exhibit 22 (NC) - CBSA import and compliance statistics for the period of review - Day 50.

²⁸ Exhibit 15 (NC) - Articles, reports and CBSA research, page 15.

²⁹ Ibid.

large producer of steel grating in China with an annual capacity of 50,000 tons,³⁰ lists America as one of its main export markets.³¹ Wuxi Royce Grating Machinery Manufacturing Co., Ltd. produces 60,000 tons of steel grating annually, 70% of which is exported.³² Shanghai Klemp Metal Products Co., Ltd.'s production capacity for steel grating is 15,000 tons annually and approximately 70% of production is exported.³³ Lastly, Yantai Wanjie New Materials Co., Ltd., with its 20,000 ton steel grating production capacity, exports its production to many countries.³⁴

[71] The steel overcapacity situation in China has been well documented in economic reports and recent trade remedy cases. In the OCTG I Expiry Review decision issued in December 2020, the Tribunal recognized that “the perennial excess global steel capacity, largely attributable to massive production in China, remains an important issue overhanging the Canadian and global steel markets [...] Excess capacity creates significant incentive for Chinese producers to pursue export sales, at low prices, in order to maintain high capacity utilization.” China's steel production and inventories reached record highs in the first half of 2020. Despite the pandemic, by December 2020, China was on track to reach 1 billion tons of steel production in 2020, exceeding 2019's production record of 996.3 million tons. The noted increase in capacity was undertaken despite the slowing global demand for steel caused by COVID-19, an important contributor to global steel overcapacity in general.³⁵

Decline of Canadian oil and gas, construction and manufacturing sectors leading to decreased demand for steel grating

[72] The health of the oil and gas sector in Canada is important to the demand for steel grating because of the sector's size and substantial requirements for industrial physical infrastructure. With the price of oil hitting record lows in 2020, many Canadian oil and gas companies (customers of steel grating) reduced their capital spending (e.g., Suncor, Pembina Pipeline Corporation, Enerplus Corporation, Vermilion Energy Inc, Husky Energy Inc. Crescent Point Energy Corp., Cenovus Energy Inc., and TC Energy).³⁶

[73] Although the Canadian oil and gas pricing is expected to recover and capital spending to accordingly increase in 2021, it is important to note that the total estimated investment in 2020 (\$24 billion) was the lowest in more than a decade and market demand for steel grating remains low. Oil and gas customers will remain price sensitive while they recover and will be inclined to prefer low priced commodity materials for their infrastructure projects.³⁷ Any increase in demand will very likely be met by increased import supply from China absent trade remedies.

[74] Additionally, the COVID-19 pandemic limited the demand for steel grating due to government lockdowns and the decline in construction projects and production activities of end-

³⁰ Exhibit 15 (NC) - Articles, reports and CBSA research, page 17.

³¹ Ibid.

³² Exhibit 15 (NC) - Articles, reports and CBSA research, page 20.

³³ Exhibit 15 (NC) - Articles, reports and CBSA research, page 25.

³⁴ Exhibit 18 (NC) - Articles, reports and CBSA research #2, page 20.

³⁵ Exhibit 16 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q28.

³⁶ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 31.

³⁷ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 32.

use industries.³⁸ COVID-19 also negatively impacted global supply chains, manufacturing, delivery schedules, and sales of various goods.

[75] According to TD Economics, Canada's manufacturing sector has been on a decline since the end of 2019 and conditions were worsened by pandemic. Scotiabank Economics notes that manufacturing sales decreased in the fourth quarter of 2020. In December 2020, Statistics Canada reported that non-residential investment remained at \$4.4 billion for the third consecutive month and industrial investment was down 0.2%. The total value of building permits declined 2.3% in 2020 and the non-residential sector posted the largest decline since 2009, down 17% to \$33.8 billion. All non-residential sectors reported declines in December 2020, including a decline in the industrial sector of 24.4% which is closely linked to the steel grating market. Overall, the non-residential sectors fell a total of 10.8% to \$2.7 billion.³⁹ As a result of these disruptions, the growth prospects for the steel grating market are limited.

[76] These negative changes in market conditions in Canada have led to decreased demand for steel grating and increased downward pressure on the price of steel grating. As steel grating is a fully substitutable commodity product that competes mainly on the basis of price,⁴⁰ Canadian oil and gas, construction and manufacturing companies would be incentivized to purchase from the lowest-priced suppliers of steel grating. This could potentially lead to resumed dumping of certain steel grating.

Continued weakening in domestic demand for steel in China leading to an increasing reliance on export markets

[77] Chinese steel grating producers look to export markets when local demand for steel grating is weak. Demand in the commercial and industrial construction sectors in China can be used as a proxy for local steel grating demand because steel grating is a construction input.

[78] As noted by Fisher & Ludlow, in March 2020, GlobalData projected construction sector growth for North-East Asia in 2020 to slow to 1.0%, and to -1.2% for South and South-East Asia with South and South-East Asian growth being closely tied to China's demand. The slow growth in the building and construction industry in China and other Asian markets will likely reduce demand for steel grating in China and other proximate markets, forcing Chinese steel grating producers to turn to other international markets, including Canada, as homes for their products.⁴¹

[79] As Chinese demand slows, steel output in China has increased to extraordinary levels. China's share of global crude steel output rose to 57.5% over January to November of 2020, compared to 53.3% for the entire year of 2019 according to World Steel Association data.⁴² For every month since April 2020, China's crude steel production recorded on-year growth. Over January to November 2020, China produced 961 million tonnes of crude steel, up 5.5% annually.

³⁸ Exhibit 15 (NC) - Articles, reports and CBSA research, page 10.

³⁹ Exhibit 16 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q23.

⁴⁰ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 22.

⁴¹ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), paras. 18-19.

⁴² Exhibit 15 (NC) - Articles, reports and CBSA research, page 39.

At the same time, the total steel output worldwide dropped by 1.3% annually to 1.7 billion tonnes, with the output from 63 countries and regions (excluding China) dropping 9.2% annually.⁴³

[80] The weakening domestic demand combined with the large production capacity and an export-oriented philosophy suggests that steel grating producers would increase their efforts to export steel grating.

Anti-dumping measures concerning Chinese steel grating in the U.S. and Turkey

[81] As noted by Fisher & Ludlow, the U.S. and Turkey currently have anti-dumping measures in place on steel grating from China.

[82] In the U.S., anti-dumping duties have been imposed on Chinese steel grating imports since 2010.⁴⁴ Due to Canada's close proximity to the U.S., Chinese steel grating exports can easily be diverted to Canada.

[83] The USITC recently extended its order in the five-year sunset review concerning steel grating from China on May 7, 2021.⁴⁵

[84] The USITC found that the revocation of the orders would likely lead to a "significant volume of subject imports that would likely significantly undersell the domestic like product, leading subject imports to gain market share and/or have price-depressing or suppressing effects on the domestic like product." It further noted that "subject imports' significant volume and price effects would consequently likely have a significant adverse effect on the domestic industry's production, capacity utilization, shipments, employment, and profitability."⁴⁶

[85] With the continuation of the U.S. measures and the steady decline of steel grating imports into the U.S. from 2015 to 2019, Canada is exposed to diversion risk for available volumes of Chinese steel grating.⁴⁷

[86] Additionally, the U.S. continues to maintain a 25% duty on a diversity of steel products from China under Section 301 of the *Trade Act of 1974*, including steel grating.⁴⁸

[87] Turkey also imposed a safeguard on products imported under tariff subheading 7308.90 in 2018, under which steel grating is classified. A result of this safeguard would be incentive for Chinese producers to direct exports to the U.S. Both countries' trade measures against steel

⁴³ Ibid.

⁴⁴ Exhibit 23 (NC) - Additional information submitted by counsel for Ludlow & Fisher regarding the USITC publication 5195 concerning certain steel grating from China., page 12.

⁴⁵ Exhibit 19 (PRO) - Additional information to the response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L")., Attachment Q29-2.

⁴⁶ Exhibit 23 (NC) - Additional information submitted by counsel for Ludlow & Fisher regarding the USITC publication 5195 concerning certain steel grating from China., page 31.

⁴⁷ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 28.

⁴⁸ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 27.

grating would cause an elevated risk of diversion of steel grating to the Canadian market in the absence of the current order.⁴⁹

Determination Regarding Likelihood of Continued or Resumed Dumping

[88] Based on the information on the record in respect of: the continued dumping of certain steel grating while the CITT order was in effect and the inability for Chinese exporters to compete at non-dumped prices; the production capacity and export-orientation of steel grating producers in China; the decline of Canadian oil and gas, construction and manufacturing sectors leading to decreased demand for steel grating; the continued weakening in domestic demand for steel in China leading to an increasing reliance on export markets; and the anti-dumping measures concerning Chinese steel grating in the U.S. and Turkey, the CBSA determined that the expiry of the order is likely to result in the continuation or resumption of dumping of steel grating, originating in or exported from China, into Canada.

POSITION OF THE PARTIES - SUBSIDIZING

Parties Contending that Continued or Resumed Subsidizing is Likely

[89] Fisher & Ludlow made representations through its ERQ response as well as in its case brief in support of its position that subsidizing from China is likely to continue or resume in the event the present order is rescinded. Consequently, Fisher & Ludlow argues that the countervailing measures should remain in place.

[90] The main factors identified by Fisher & Ludlow can be summarized as follows:

- continued subsidizing while the order was in effect
- current countervailing measures concerning Chinese steel grating in the U.S. and other Chinese steel products in Canada

Continued subsidizing while the order was in effect

[91] Fisher & Ludlow argued that the nature of the Chinese subsidies supports its position on the likelihood of continued subsidizing of Chinese steel grating. It claimed that Chinese steel grating manufacturers continue to benefit from the subsidy programs identified in the CBSA's original steel grating investigation in 2010.⁵⁰

[92] Fisher & Ludlow also alleged that Chinese steel grating producers received subsidies that were investigated by the CBSA in past cases (e.g., Welded Large Diameter Carbon and Alloy Steel Line Pipe, Fabricated Industrial Steel Components, Sucker Rods, Cold-rolled Steel and Corrosion-Resistant Steel Sheet 2).⁵¹

⁴⁹ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 29.

⁵⁰ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 8.

⁵¹ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 9.

[93] Fisher & Ludlow asserted that these programs continue to provide significant benefits to producers of subject goods who exported to and expressed continued interest in the Canadian market during the POR, allowing them to maintain price advantages over the Canadian industry.

Current countervailing measures concerning Chinese steel grating in the U.S. and other Chinese steel products in Canada

[94] Fisher & Ludlow also notes that steel grating from China is currently subject to countervailing duties in the U.S.⁵² They also provided evidence of several countervailing measures on other Chinese steel products in Canada.

[95] In January 2021, the U.S. Department of Commerce determined that the twelve countervailable programs found in their original investigation on steel grating from China continue to exist and be used.⁵³

[96] Fisher & Ludlow indicated that the CBSA had determined that extensive Chinese subsidies are in place for producers of a wide range of other downstream steel products.⁵⁴ Examples since the last steel grating expiry review include CBSA's determinations of subsidizing of Chinese exports in Fabricated Industrial Steel Components, Sucker Rods, Steel Piling Pipe, Hot-Rolled Steel Plate 3, Carbon Steel Welded Pipe and Concrete Reinforcing Bar, among other steel product cases. Fisher & Ludlow believes that these programs are available to the Chinese steel grating industry as well,⁵⁵ and that the expiration of the current order would result in the continuance of steel grating exports to Canada at subsidized prices.⁵⁶

[97] Fisher & Ludlow states, "as many of China's steel sector subsidy programs are not product specific, it is likely beyond doubt that steel grating producers also continue to benefit from a number of the same programs described in [other steel] cases."⁵⁷

[98] Lastly, other expiry reviews for various steel products from China have been initiated since the last steel grating order. In all of those cases, the CBSA determined that the expiry of those findings/orders would likely result in the continuation or resumption of subsidizing of the goods. Fisher & Ludlow contends that this demonstrates the attractiveness of the Canadian market for subsidized steel products and is further evidence that Chinese producers and exporters will continue to resort to subsidized pricing to capture market share despite various trade remedies.⁵⁸

⁵² Exhibit 23 (NC) - Additional information submitted by counsel for Ludlow & Fisher regarding the USITC publication 5195 concerning certain steel grating from China., page 12.

⁵³ Exhibit 18 (NC) - Articles, reports and CBSA research #2, page 17.

⁵⁴ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 9.

⁵⁵ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 45.

⁵⁶ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 46.

⁵⁷ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 9.

⁵⁸ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L")., para. 46.

Parties Contending that Continued or Resumed Subsidizing is Unlikely

[99] None of the parties contended that continued or resumed subsidizing of subject goods from China is unlikely should the CITT's order expire.

CONSIDERATION AND ANALYSIS - SUBSIDIZING

[100] In making a determination under paragraph 76.03(7)(a) of SIMA whether the expiry of the order in respect of goods from China is likely to result in the continuation or resumption of subsidizing of these goods, the CBSA may consider factors identified in subsection 37.2(1) of the SIMR, as well as any other factors relevant in the circumstances.

[101] No exporters or importers provided a response to the ERQ, nor did they file case briefs or reply submissions. Likewise, the GOC did not provide a response to the ERQ, nor did the GOC provide a case brief or reply submission.

[102] In the absence of participation from exporters, importers or the GOC, the CBSA relied on other information in assessing the likelihood of continued or resumed subsidization should the CITT's order be rescinded.

[103] Guided by the aforementioned factors and having considered the information on the administrative record, the following list represents a summary of the factors analyzed by the CBSA in conducting this expiry review investigation with respect to subsidization:

- continued subsidizing of steel grating while the order was in effect
- current countervailing measures concerning Chinese steel grating in the U.S. and other Chinese steel products in Canada

Continued subsidizing of steel grating while the order was in effect

[104] In light of the lack of participation from Chinese producers and exporters of subject goods and the lack of participation by the GOC in the most recent re-investigation, the CBSA relied on information from the original subsidy investigation in assessing the likelihood of continued or resumed subsidization should the CITT order be rescinded.

[105] During the original subsidy investigation in 2010, 62 potential subsidy programs were investigated and 3 of these subsidy programs were determined to have conferred benefits to the cooperative exporters. Expressed as a percentage of export price, the amounts of subsidy determined by the CBSA for the cooperative exporters ranged from 9.45% to 12.58%.

[106] A list of the programs that were used by cooperative exporters at the time of the final determination is as follows:

- Export Assistance Grant
- Award of Taxpayers in Yanghang Industrial Park
- Input Materials Provided by Government at Less than Fair Market Value

[107] It was found that 100% of the goods exported from China were subsidized. The weighted average amount of subsidy, expressed as a percentage of the export price, was equal to 174.99%. The amounts of subsidy found for cooperative exporters ranged from 543 to 632 Renminbi (RMB) per metric tonne (MT). The amount of subsidy for all other exporters was determined to be equal to 13,064 RMB per MT, as determined according to a Ministerial specification pursuant to subsection 30.4(2) of SIMA.

[108] Detailed descriptions of the programs and explanations as to why they were regarded as countervailable subsidies are contained in the CBSA's Statement of Reasons issued at the final determination.

[109] While the order was in place, Chinese steel grating producers have maintained presence in the Canadian market through exports as can be seen in **Table 1**.

[110] Information on countervailing duties collected during the POR is presented in the "Case Enforcement" section. Importations of certain steel grating from China have resulted in the assessment of anti-dumping and countervailing duties of approximately 1.6 million dollars.⁵⁹ All subject goods imported into Canada during the POR were assessed countervailing duties.

Current countervailing measures concerning Chinese steel grating in the U.S. and other Chinese steel products in Canada

[111] On May 7, 2021, the USITC determined in its second sunset review of the U.S. steel grating order that revoking the order on imports of steel grating from China would likely lead to a continuation or recurrence of subsidization. In the U.S. Department of Commerce's January 2021 decision, it determined that countervailable subsidy programs in China continue to exist and are used to support steel grating production.⁶⁰

[112] Furthermore, the number of Canadian countervailing measures presently in place against the Chinese steel products demonstrates the GOC's continued commitment to providing subsidies to Chinese companies operating in the steel industry, including steel grating producers.

[113] For example, in Fabricated Industrial Steel Components, the CBSA found 158 potential subsidy programs, while in Sucker Rods, the CBSA identified 22 potential subsidy programs, some of which may also apply to steel grating.

[114] Additionally, several recent expiry review investigations of other steel products from China have also resulted in conclusions of the likelihood of continued or resumed subsidization.

[115] In Pup Joints, the CBSA concluded that the existence of steel-related countervailing measures against products from China would indicate that the Government of China "placed a great deal of importance on its steel industry and subsidized it accordingly."⁶¹

⁵⁹ Exhibit 22 (NC) - CBSA import and compliance statistics for the period of review - Day 50.

⁶⁰ Exhibit 25 (NC) - Case brief filed on behalf of Fisher & Ludlow ("F&L"), para. 10.

⁶¹ Exhibit 16 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q29.

[116] In Steel Piling Pipe, the CBSA similarly found that the Government of China continued to be involved in the steel industry and influenced this industry through programs determined by CBSA to be countervailable subsidies.⁶²

[117] More recently in OCTG 1, the CBSA found that continued subsidization was likely in light of numerous subsidy (trade remedy) measures imposed by Canada and the U.S. concerning steel tubular products from China.⁶³ It is likely that Chinese producers and exporters of steel grating also continue to benefit from these countervailable subsidy programs.

Determination Regarding Likelihood of Continued or Resumed Subsidizing

[118] Based on the information on the administrative record in respect of the continued subsidizing while the order was in effect and the countervailing measures against steel grating in the U.S. and other Chinese steel products in Canada, the CBSA determined that the expiry of the order is likely to result in the continuation or resumption of subsidizing of certain steel grating originating in or exported from China.

CONCLUSION

[119] For the purpose of making a determination in this expiry review investigation, the CBSA conducted its analysis within the scope of the factors found under subsection 37.2(1) of the SIMR and considering any other factors relevant in the circumstances. Based on the foregoing analysis of pertinent factors and consideration of information on the record, on August 26, 2021, the CBSA made a determination pursuant to paragraph 76.03(7)(a) of SIMA that the expiry of the order made by the CITT on April 18, 2016, in Expiry Review No. RR-2015-001, in respect of certain steel grating originating in or exported from China:

- i. is likely to result in the continuation or resumption of dumping of the goods into Canada; and
- ii. is likely to result in the continuation or resumption of subsidizing of the goods exported to Canada.

⁶² Exhibit 16 (NC) - Response to expiry review questionnaire (ERQ) from Fisher & Ludlow ("F&L"), Question Q29.

⁶³ Ibid.

FUTURE ACTION

[120] The CITT has now initiated its expiry review to determine whether the continued or resumed dumping and subsidizing are likely to result in injury. The CITT's Expiry Review schedule indicates that it will make its decision by February 2, 2022.

[121] If the CITT determines that the expiry of the order with respect to the goods is likely to result in injury, the order will be continued in respect of those goods, with or without amendment. If this is the case, the CBSA will continue to levy anti-dumping and/or countervailing duties on dumped and/or subsidized importations of the subject goods.

[122] If the CITT determines that the expiry of the order with respect to the goods is not likely to result in injury, the order will be rescinded in respect of those goods. Anti-dumping and/or countervailing duties would then no longer be levied on importations of the subject goods, and any anti-dumping and/or countervailing duties paid in respect of goods that were released after the date that the order was scheduled to expire will be returned to the importer.

INFORMATION

[123] For further information, please contact the officer listed below:

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