



OTTAWA, July 25, 2025

CISP 2025 IN

STATEMENT OF REASONS

Concerning the initiation of the investigations into the alleged dumping and subsidizing of

CAST IRON SOIL PIPE ORIGINATING IN OR EXPORTED FROM CHINA

DECISIONS

Pursuant to subsection 31(1) of the *Special Import Measures Act*, the Canada Border Services Agency initiated investigations on July 11, 2025, respecting the alleged injurious dumping and subsidizing of cast iron soil pipe originating in or exported from the People's Republic of China.

Cet *Énoncé des motifs* est également disponible en français.
This *Statement of Reasons* is also available in French.

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SUMMARY

[1] On May 22, 2025, the Canada Border Services Agency (CBSA) received a written complaint from Canada Pipe Company ULC, d/b/a Bibby-Ste-Croix (Ste-Croix, Quebec) (hereinafter, the complainant) alleging that imports of cast iron soil pipe (CISP) originating in or exported from the People's Republic of China (China) are being injuriously dumped and subsidized.

[2] On June 12, 2025, pursuant to paragraph 32(1)(a) of the *Special Import Measures Act* (SIMA), the CBSA informed the complainant that the complaint was properly documented. On June 20, 2025, the CBSA informed the Government of China that a properly documented complaint had been filed. At that time, the Government of China was provided with a non-confidential version of the subsidy complaint and was invited for consultations pursuant to Article 13.1 of the *Agreement on Subsidies and Countervailing Measures*, prior to the initiation of the subsidy investigation. The CBSA did not receive any request for consultations.

[3] The complainant provided evidence to support the allegations that CISP from China has been dumped and subsidized, as well as evidence that discloses a reasonable indication that the dumping and subsidizing have caused injury or are threatening to cause injury to the Canadian industry producing like goods.

[4] On July 11, 2025, pursuant to subsection 31(1) of SIMA, the CBSA initiated investigations respecting the dumping and subsidizing of CISP from China.

INTERESTED PARTIES

Complainant

[5] The name and address of the complainant is as follows:

Canada Pipe Company ULC, d/b/a Bibby-Ste-Croix
6200 Rue Principale
Ste-Croix (Québec)
G0S 2H0

Other Producers

[6] The complainant stated that they are the only producer of CISP in Canada.¹ The CBSA did its own supplementary research, but could not identify any other producers in Canada.

¹ Exhibit 2 – CISP Complaint (NC), para. 8

Trade Union

[7] The complainant identified Syndicat des travailleurs et travailleuses de Bibby Sainte-Croix – CSN, as the trade union that represents members employed for the complainant.²

Exporters

[8] The CBSA identified 41 potential exporters and/or producers of the subject goods from CBSA import documentation and from information submitted in the complaint. All of the potential exporters were asked to respond to the CBSA's Dumping Request for Information (RFI), Subsidy RFI and Section 20 RFI.

Importers

[9] The CBSA identified 28 potential importers of the subject goods from CBSA import documentation and from information submitted in the complaint. All of the potential importers were asked to respond to the CBSA's Importer RFI.

Government

[10] Upon initiation of the investigations, the Government of China was sent the CBSA's Government Subsidy RFI and Government Section 20 RFI.

[11] For the purposes of the investigations, the Government of China refers to all levels of government, i.e., federal, central, provincial/state, regional, municipal, city, township, village, local, legislative, administrative or judicial, singular, collective, elected or appointed. It also includes any person, agency, enterprise, or institution acting for, on behalf of, or under the authority of, or under the authority of any law passed by, the government of that country or that provincial, state or municipal or other local or regional government.

² Exhibit 2 – CISP Complaint (NC), para. 11

PRODUCT INFORMATION

DEFINITION

[12] For the purpose of these investigations, subject goods are defined as:

Cast iron soil pipe originating in or exported from the People's Republic of China, whether finished or unfinished, regardless of industry or proprietary specifications, and regardless of wall thickness, length, surface finish, end finish, or stenciling, having a nominal outside diameter from 1.5 inches to 18 inches. Cast iron soil pipe is non-malleable iron pipe of various designs and sizes, including but not limited to both hubless and hub and spigot cast iron soil pipe.

For greater certainty, the product definition includes all pipe meeting the physical description set forth above, whether or not produced according to a particular standard or specification.

ADDITIONAL PRODUCT INFORMATION³

[13] CISP is a non-malleable cast iron pipe produced in a variety of sizes and used as a component for sanitary and storm drain, waste, and vent piping. CISP may be called “soil pipe”, “drainage pipe” or simply “pipe” and is used in residential, commercial, and industrial construction, as well as public buildings such as schools and hospitals. Additionally, CISP may be used for storm drainage from roofs, yards, areaways, and courts.

[14] CISP is classified as either hub and spigot pipe or hubless pipe. CISP is generally distinguished from other types of non-malleable cast iron pipe by the manner in which it is connected to cast iron soil pipe fittings. Hub and spigot pipe has hubs into which the spigot (plain end) of another pipe or of a fitting is inserted. The joint is sealed with a compression gasket or molten lead and oakum. Hubless pipe is manufactured without a hub and is joined to a fitting or another pipe using a hubless coupling that fits over the ends of the pipe and fitting or the ends of the pipes and is tightened to seal the joint.

[15] In Canada, CISP is governed by Canadian Standards Association (CSA) specification B70, while in the United States, CISP is governed by Cast Iron Soil Pipe Institute (CISPI) 301 as well as American Society for Testing and Materials (ASTM) A888 and A74 standards.

³ Exhibit 2 – CISP Complaint (NC), paras. 12-15

[16] There are four types of cast iron: (1) gray cast iron (*i.e.*: CISP, non-malleable cast iron); (2) white cast iron; (3) ductile cast iron; and (4) malleable cast iron. Gray iron contains interconnected graphite flakes which form during solidification of the iron. Non-malleable cast iron does not include ductile iron, white cast iron, or malleable iron, which are all different products sold for different uses at different price points. Ductile cast iron (also referred to as ductile iron) contains graphite that occurs as spheroids owing to the addition of a small amount of magnesium to the molten iron and malleable cast iron contains graphite which occurs as irregularly shaped nodules as a result of heat treatment after the castings are formed. The form in which the graphite occurs in the cast iron determines a range of properties in the cast iron. Ductile cast iron is typically used for pressurized water transmission and is sold at higher prices compared to gray cast iron due to higher costs of production. Notably, it can be downward substitutable in applications that require gray cast iron or CISP, although the opposite is not possible as gray cast iron is non-malleable. White cast iron derives its name from its silvery or white appearance. White cast iron has a brittle and hard cementite microcrystalline structure.

PRODUCTION PROCESS⁴

[17] CISP is manufactured by melting scrap iron (or pig iron and/or iron ore) and alloys in a cupola furnace and casting the metal into the desired shapes.⁵ The first step in producing CISP is to screen all scrap metal for radiation and to remove any contaminated materials. The scrap metal is then transferred to a storage area until it is time to melt the metal in the cupola furnace. In a vertically erected, cylindrical cupola furnace, an initial layer of coke is ignited and then the scrap and alloys, coke, and limestone (which helps remove coke ash and other impurities), are loaded in alternating layers. Alloys added to the melt include ferrosilicon and ferromanganese, among others, although alloys only account for around 1 to 2 percent of the total volume of metal. Tuyeres (nozzles) inject combustion air or blast air heated up to 600 degrees Fahrenheit into the furnace. As the initial inputs are reduced, additional scrap, coke, and limestone are added to the furnace, resulting in a melting process that is usually continuous. The molten metal is discharged through a tap hole near the bottom of the furnace and is stored in a holding furnace.

[18] The molten metal from the cupola furnace is cast into CISP in spinners using centrifugal casting. In the centrifugal pipe casting process, molten metal transported from the cupola furnace is added to a metal mold. The ends of the mold are then sealed. The mold is rotated on a horizontal axis to create a centrifugal force while the molten metal is added to the mold. The centrifugal force causes the molten metal to spread uniformly onto the mold's inner surface to the desired dimensions of the pipe. The molten iron is allowed to cool inside the rotating mold until the iron solidifies, at which point the pipe is removed from the mold and moved to the foundry's cleaning and finishing department.

⁴ Exhibit 2 – CISP Complaint (NC), paras. 13, 17-19, 48

⁵ Producers of CISP may use a different “recipe” of the main raw material inputs (pig iron, coke and scrap) to achieve the desired product.

[19] Cleaning the CISP after it is removed from the molds involves removing burrs and sharp edges on the ends of the pipe. After the CISP is cleaned, it is inspected and tested before it receives any finishing it might need. For example, CISP may be finished with an asphaltic coating, applied by dipping the pipe into a bath of coating material.

CLASSIFICATION OF IMPORTS

[20] The allegedly dumped and subsidized goods are normally imported under the following tariff classification numbers:

7303.00.00.10

7303.00.00.90

[21] The listing of tariff classification numbers is for convenience of reference only. The tariff classification numbers include non-subject goods. Also, subject goods may fall under tariff classification numbers that are not listed. Refer to the product definition for authoritative details regarding the subject goods.

LIKE GOODS AND CLASS OF GOODS⁶

[22] Subsection 2(1) of SIMA defines “like goods” in relation to any other goods as “... (a) goods that are identical in all respects to the other goods, or (b) in the absence of any such goods, goods the uses and other characteristics of which closely resemble those of the other goods.” In considering the issue of like goods, the Canadian International Trade Tribunal (CITT) typically looks at a number of factors, including the physical characteristics of the goods, their market characteristics, and whether the domestic goods fulfill the same customer needs as the subject goods.

[23] With respect to the domestically produced CISP, the complainant states that they are capable of producing goods that are either identical to or directly competitive with the CISP products included in the scope of the complaint. The complaint submits that domestically produced CISP and CISP imported from China have the same general inputs and methods of manufacturing, the same market characteristics and fulfill the same customer needs.

[24] For the purposes of this analysis, like goods consist of domestically produced CISP described in the product definition.

[25] After considering questions of use, physical characteristics and all other relevant factors, the CBSA is of the opinion that subject goods and like goods constitute only one class of goods.

⁶ Exhibit 2 – CISP Complaint (NC), paras. 27-33

THE CANADIAN INDUSTRY

DOMESTIC PRODUCERS

[26] Besides the complainant, there are no other known producers of CISP in Canada.

ESTIMATES OF DOMESTIC PRODUCTION⁷

[27] The complaint includes the annual production of like goods for the complainant from January 1, 2021 through March 31, 2025. As the complainant is the only producer in Canada, the complainant accounts for 100% of the production of CISP in Canada.

STANDING

[28] Pursuant to subsection 31(2) of SIMA, the following conditions must be met in order for an investigation to be initiated:

- (a) the complaint is supported by domestic producers whose production represents more than 50% of the total production of like goods by those domestic producers who express either support for or opposition to the complaint, and
- (b) the production of the domestic producers who support the complaint represents 25% or more of the total production of like goods by the domestic industry.

[29] Based on an analysis of information provided in the complaint, as well as the information gathered by the CBSA, the CBSA is satisfied that the standing requirements of subsection 31(2) of SIMA have been met.

THE CANADIAN MARKET

[30] The complainant, using Statistics Canada Import Data⁸, estimated the total volume and value of imports of CISP from China and all other countries from January 1, 2021 to March 31, 2025.

[31] The CBSA conducted its own independent review of imports of CISP from the CBSA's Facility Information Retrieval Management (FIRM) database using the tariff classification numbers under which the subject goods are imported from China and all other countries. In addition, the CBSA reviewed its Accelerated Commercial Release Operations Support System (ACROSS) data to correct any errors and remove non-subject imports.

[32] Detailed information regarding the sales from domestic production by the complainant as well as volume of imports of subject goods cannot be divulged for confidentiality reasons. However, the CBSA has prepared the following tables to show the estimated import share of subject goods in Canada.

⁷ Exhibit 2 - CISP Complaint (NC), paras. 8

⁸ Exhibit 2 – CISP Complaint (NC), Non-Confidential Exhibit 8-03

**Table 1:
CBSA’s Estimate of CISP Import Volumes**

	2021	2022	2023	2024	Q1 2024	Q1 2025
China	37%	45%	75%	80%	73%	58%
Other	63%	55%	25%	20%	27%	42%
Total	100%	100%	100%	100%	100%	100%

[33] The CBSA will continue to gather and analyze information on the volume of imports during the Period of Investigation (POI) of April 1, 2024 to March 31, 2025 as part of the preliminary phase of the dumping and subsidy investigations and will refine these estimates.

EVIDENCE OF DUMPING

[34] The complainant alleged that the subject goods from China have been injuriously dumped into Canada. Dumping occurs when the normal value of the goods exceeds the export price to importers in Canada.

[35] Normal values are generally based on the domestic selling price of like goods in the country of export where competitive market conditions exist or as the aggregate of the cost of production of the goods, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits.

[36] The complainant alleged that the CISP sector in China may not be operating under competitive market conditions and as such, the domestic market for CISP may not be relied upon for the purpose of determining normal values. Accordingly, the complainant submitted that normal values should be determined under section 20 of SIMA.

[37] The export price of goods sold to importers in Canada is generally the lesser of the exporter’s selling price and the importer’s purchase price, less all costs, charges and expenses resulting from the exportation of the goods.

[38] Estimates of normal values and export prices by both the complainant and the CBSA are discussed below.

[39] The complainant calculated a margin of dumping for the period of April 1, 2024 to March 31, 2025. The information available made it possible for the CBSA to calculate normal values and export prices for the period of April 1, 2024 to March 31, 2025.

SECTION 20 ALLEGATIONS

[40] Section 20 is a provision of SIMA that may be applied to determine the normal value of goods in a dumping investigation where certain conditions prevail in the domestic market of the exporting country. In the case of a prescribed country under paragraph 20(1)(a) of SIMA, it is applied where, in the opinion of the CBSA, the government of that country substantially determines domestic prices and there is sufficient reason to believe that the domestic prices are not substantially the same as they would be in a competitive market.⁹

[41] The provisions of section 20 are applied on a sector basis rather than on the country as a whole. The CBSA initiates dumping investigations on the presumption that section 20 is not applicable to the sector under investigation unless there is information that suggests otherwise.

[42] A section 20 inquiry refers to the process whereby the CBSA collects information from various sources in order to form an opinion as to whether the conditions described under subsection 20(1) of SIMA exist with respect to the sector under investigation. Before initiating an inquiry under section 20, the CBSA must first analyze the information submitted in the complaint and the evidence it has gathered independently to determine if it is sufficient to warrant the initiation of an inquiry.

[43] The complainant alleges that the conditions described in section 20 of SIMA prevail in the iron pipe sector in China, including the CISP sector. That is, the complainant alleges that this sector in China does not operate under competitive market conditions and consequently, the domestic prices of cast iron soil pipe established in China would not be reliable for determining normal values.¹⁰

[44] The complainant provided a variety of evidence to support the claim that the Government of China substantially determines domestic prices of CISP and that the prices are substantially different than they would be in a competitive market. Specifically, the complainant cited specific policies implemented by the Government of China, and provided evidence of state ownership and subsidization in the iron pipe sector, including the CISP sector.

[45] The CBSA has reviewed the information provided in the complaint and conducted its own research. Based on this information, the CBSA believes that there is reasonable evidence to support an inquiry into the allegations that the measures taken by the Government of China substantially influence prices in the iron pipe sector, including the CISP sector, and that the prices are substantially different than they would be in a competitive market.

[46] Consequently, on July 11, 2025, the CBSA included in its investigations, a section 20 inquiry in order to determine whether the conditions set forth in paragraph 20(1)(a) of SIMA prevail in the CISP sector in China.

⁹ China is a prescribed country under Section 17.1 of the *Special Import Measures Regulations*.

¹⁰ Exhibit 2 – CISP Complaint (NC), Annexe A – para. 8

[47] As part of this section 20 inquiry, the CBSA sent section 20 RFIs to all potential producers and exporters of CISP in China, as well as to the Government of China, requesting detailed information related to the CISP sector in China.

[48] In cases where conditions of section 20 exist, pursuant to paragraph 20(1)(c), the normal value can be determined based on profitable selling prices or full costs of production and an amount for profit on goods sold domestically in a surrogate country, to which the conditions described in section 20 of SIMA are not applicable.

[49] For the purposes of obtaining information necessary to calculate normal values pursuant to subparagraph 20(1)(c) of SIMA, the CBSA requested information from producers in surrogate countries. As such, the CBSA requested information from producers in the United States (U.S.), France, and India.

[50] Importers will be requested to provide information on sales of like goods produced in the surrogate countries, in the event that normal values must be determined under paragraph 20(1)(d) of SIMA.

[51] In the event that the CBSA forms an opinion that domestic prices of CISP in China are substantially determined by the government, and there is sufficient reason to believe that the domestic prices are not substantially the same as they would be if they were determined in a competitive market, the normal values of the goods under investigation will be determined, pursuant to paragraph 20(1)(c) of SIMA, where such information is available, on the basis of the domestic selling prices or the aggregate of the cost of production, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits of like goods sold by producers in any country designated by the CBSA and adjusted for price comparability; or, pursuant to paragraph 20(1)(d) of SIMA, where such information is available, on the basis of the selling price in Canada of like goods produced and imported from any country designated by the CBSA and adjusted for price comparability.

[52] For the purposes of initiation, the CBSA has made a conservative estimate of the margin of dumping for China and therefore did not utilize the section 20 methodology.

NORMAL VALUE

Complainant's Estimates of Normal Value

Section 15

[53] The complainant stated that they were able to locate a small amount of Chinese CISP pricing data on e-commerce platforms but indicates that the pricing should not be used for purposes of estimating normal values pursuant to section 15 of SIMA for the following reasons: section 20 conditions exist in China, prices are not representative of ex-works factory pricing, pricing is predominantly for export markets, pricing is provided across models and weights, pricing data available does not provide good coverage over the proposed POI, and prices appear to be below costs.¹¹ As such, the complainant has not estimated normal values pursuant to section 15 of SIMA.

Section 19(b)

[54] The complainant estimated normal values using a constructed cost approach based on the methodology in paragraph 19(b) of SIMA, calculated based on the aggregate of estimates of the cost of production of the subject goods, a reasonable amount for administrative, selling and other costs (SG&A) and a reasonable amount for profits.

[55] The complainant estimated the cost of production of the subject goods from China based on the following methodology.

Complainant's Estimate of Cost of Production

[56] For material costs, the complainant relied on monthly average Chinese pricing¹² for inputs used in the production of CISP, where such information was available through industry publication Fastmarkets; namely: pig iron, hard coking coal, steel scrap, and ferromanganese.¹³ The raw material costs were then adjusted by consumption rates that the complainant calculated using production and consumption information reported publicly by a Chinese CISP producer during the U.S. Department of Commerce 2020 Administrative Review in order to yield total raw material costs for finished CISP, estimated on a monthly basis.¹⁴

[57] For the cost of labour, the complainant used their own weighted average labour costs per tonne for producing CISP, adjusted by a factor based on publicly available data from the International Labour Organization regarding monthly wages in the manufacturing sector. The adjustment was made by calculating the difference between the Canadian labour rate and the labour rate in China for 2022.¹⁵

¹¹ Exhibit 2 – CISP Complaint (NC), paras. 39-40

¹² Note: Fastmarkets pricing data contains a mix of import and domestic pricing

¹³ Exhibit 2 – CISP Complaint (NC), para. 49

¹⁴ Exhibit 2 – CISP Complaint (NC), para. 48, Non-Confidential Exhibits 6-03a & 6-03b

¹⁵ Exhibit 2 – CISP Complaint (NC), paras. 50-51, Non-Confidential Exhibits 6-07 & 6-08

[58] Overhead costs were based on the complainant’s own overhead costs, with an adjustment applied to the indirect labour component of general factory overhead to reflect labour rate differences in China.¹⁶

SG&A, Financial Expenses and Amount for Profit

[59] To estimate a reasonable amount for selling, general and administrative costs (SG&A), financial expenses and profit, the complainant relied on publicly available quarterly financial statements from a ductile pipe producer in China, covering the proposed POI (i.e. Q2 2024 to Q1 2025).¹⁷ The complainant states that they were unable to locate financial statements for any CISP producers in China but submits that ductile pipe is a reasonable proxy as it is a refined version of cast iron pipe and is part of the same general iron pipe sector. The complainant acknowledges that ductile pipe would have higher selling prices but notes that ductile pipe also incurs higher costs, therefore yielding an overall similar profit to CISP. Using this information, the complainant has estimated SG&A, financial expenses and profits as a percentage of the cost of goods sold. The table below includes the specific ratios estimated for China.

**Table 2:
Complainant’s Estimates of SG&A, Financial Expenses and Profits¹⁸**

	China
SG&A	5.1%
Financial Expenses	0.5%
Amount for Profit	1.7%

[60] Based on this methodology described above, the complainant estimated model-specific normal values for a list of benchmark products. However for purposes of estimating a margin of dumping and in light of the nature of the Statistics Canada information available, the complainant has estimated a single average normal value for the proposed POI.¹⁹

Section 20

[61] The complainant submitted that domestic selling prices of CISP in China are substantially influenced by government policies and should not be used in the calculation of normal values since the prices are not reflective of competitive market conditions. However, the complainant did not estimate normal values for exporters in China using the methodology of section 20 based on surrogate country information.

[62] The complainant submitted that the U.S. would be an appropriate surrogate country.²⁰

¹⁶ Exhibit 2 – CISP Complaint (NC), para. 52

¹⁷ Exhibit 2 – CISP Complaint (NC), paras. 53-55, Public Exhibits 6-09, 6-10 & 6-11

¹⁸ Exhibit 2 – CISP Complaint (NC), Non-Confidential Exhibits 6-09, 6-10 & 6-11

¹⁹ Exhibit 2 – CISP Complaint (NC), para. 56-57

²⁰ Exhibit 2 – CISP Complaint (NC) – Annexe A – paras. 99-102

CBSA's Estimate of Normal Value

[63] For the purposes of initiation, the CBSA estimated normal values using a constructed cost approach based on the methodology in paragraph 19(b) of SIMA, calculated based on the aggregate of an estimate of the cost of production of the subject goods, an estimate for a reasonable amount for administrative selling and other costs and an estimate for a reasonable amount for profits.

[64] In estimating normal values for subject goods based on the methodology of paragraph 19(b) of SIMA, the CBSA used the methodology used by the complainant, but making the following adjustments:

- Correction to the other operating expense amount used in the estimation of SG&A in Q4 2024
- Adjustments were made to the raw material costs to reflect updated exchange rate information
- Using information presented in the complaint, adjusted as described, the CBSA has estimated normal values on a quarterly basis for comparison to quarterly export prices

[65] With respect to the complainant's allegations that the conditions of section 20 prevail in the iron pipe sector in China, the CBSA will endeavor to gather additional information from exporters, government, and other relevant sources in order to enable the CBSA to form an opinion as to whether the conditions of section 20 exist in the domestic market for iron pipe products in China.

[66] While the CBSA acknowledges that there is reasonable evidence that the conditions of section 20 exist in the iron pipe sector in China, the CBSA finds the methodology of section 19 to be a conservative and reasonable basis for estimating normal values at this stage.

EXPORT PRICE

Complainant's Estimates of Export Price

[67] The export price of goods sold to an importer in Canada is generally determined in accordance with section 24 of SIMA as being an amount equal to the lesser of the exporter's sale price for the goods and the price at which the importer has purchased or agreed to purchase the goods adjusted by deducting all costs, charges, expenses, and duties and taxes resulting from the exportation of the goods.

[68] The complainant estimated export prices for CISP using Statistics Canada import data for goods imported under tariff classification numbers 7303.00.00.10 and 7303.00.00.90 during the proposed POI.

[69] To calculate the weighted average export price of subject imports, total import values were divided by import volumes and converted to MT to derive a single dollar per MT value.²¹

CBSA's Estimates of Export Price

[70] In order to estimate export prices, the CBSA relied on information available through E-FIRM and ACROSS for the period of April 1, 2024 to March 31, 2025. The CBSA reviewed customs data for goods imported within the tariff classification numbers in which CISP are imported under.

ESTIMATED MARGINS OF DUMPING

[71] For the purposes of the initiation of the investigations, as previously mentioned, the CBSA has estimated a margin of dumping using normal values based on the methodology of section 19 of SIMA.

[72] Based on the normal values estimated under section 19, the CBSA estimated the margin of dumping for subject goods by comparing the estimated normal values with the estimated export prices for the period of April 1, 2024 to March 31, 2025. The CBSA estimates that subject goods from China were dumped by 16.2%, expressed as a percentage of the export price.

EVIDENCE OF SUBSIDIZING

[73] In accordance with section 2 of SIMA, a subsidy exists where there is a financial contribution by a government of a country other than Canada that confers a benefit on persons engaged in the production, manufacture, growth, processing, purchase, distribution, transportation, sale, export or import of goods. A subsidy also exists in respect of any form of income or price support within the meaning of Article XVI of the General Agreement on Tariffs and Trade, 1994, being part of Annex 1A to the World Trade Organization (WTO) Agreement that confers a benefit.

[74] Pursuant to subsection 2(1.6) of SIMA, a financial contribution exists where:

- a. practices of the government involve the direct transfer of funds or liabilities or the contingent transfer of funds or liabilities;
- b. amounts that would otherwise be owing and due to the government are exempted or deducted or amounts that are owing and due to the government are forgiven or not collected;
- c. the government provides goods or services, other than general governmental infrastructure, or purchases goods; or

²¹ Exhibit 2 – CISP Complaint (NC), paras. 63-64, Non-Confidential Exhibit 6-13.

- d. the government permits or directs a non-governmental body to do anything referred to in any of paragraphs (a) to (c) above where the right or obligation to do the thing is normally vested in the government and the manner in which the non-governmental body does the thing does not differ in a meaningful way from the manner in which the government would do it.

[75] A state-owned enterprise (SOE) may be considered to constitute “government” for the purposes of subsection 2(1.6) of SIMA if it possesses, exercises, or is vested with, governmental authority. Without limiting the generality of the foregoing, the CBSA may consider the following factors as indicative of whether the SOE meets this standard: 1) the SOE is granted or vested with authority by statute; 2) the SOE is performing a government function; 3) the SOE is meaningfully controlled by the government; or 4) some combination thereof.

[76] If a subsidy is found to exist, it may be subject to countervailing measures if it is specific. A subsidy is considered to be specific when it is limited, in law or in fact, to a particular enterprise or is a prohibited subsidy. An “enterprise” is defined under SIMA as also including a “group of enterprises, an industry and a group of industries”. Any subsidy which is contingent, in whole or in part, on export performance or on the use of goods that are produced or that originate in the country of export is considered to be a prohibited subsidy and is, therefore, specific according to subsection 2(7.2) of SIMA for the purposes of a subsidy investigation.

[77] In accordance with subsection 2(7.3) of SIMA, notwithstanding that a subsidy is not specific in law, a subsidy may also be considered specific in fact, having regard as to whether:

- there is exclusive use of the subsidy by a limited number of enterprises;
- there is predominant use of the subsidy by a particular enterprise;
- disproportionately large amounts of the subsidy are granted to a limited number of enterprises; and
- the manner in which discretion is exercised by the granting authority indicates that the subsidy is not generally available.

[78] For purposes of a subsidy investigation, the CBSA refers to a subsidy that has been found to be specific as an “actionable subsidy”, meaning that it is countervailable.

SUBSIDY PROGRAMS IN CHINA

[79] In alleging that actionable subsidies were applicable to the subject goods imported from China, the complainant relied on previous findings from the CBSA subsidy investigation, as well as investigations, reviews, and findings from both the USDOC and the European Commission. The complainant also relied on publications issued by the Government of China, and general news articles and publications.

[80] The complainant referred to the CBSA's subsidy investigations regarding Carbon and Alloy Steel Line Pipe, Concrete Reinforcing Bar, Container Chassis, Decorative and Other Non-Structural Plywood, Mattresses, Large Diameter Carbon and Alloy Steel Line Pipe, Oil Country Tubular, Pea Protein, Photovoltaic Modules and Laminates, Seamless Casing, Steel Piling Pipe, Upholstered Domestic Seating, Unitized Wall Modules, and Wind Towers.²² Additionally, the complainant provided other potentially actionable subsidy programs specifically conferred to China's CISP producers based on their own research.²³

[81] The complainant provided a general description of each alleged subsidy program, together with references to the provisions in SIMA, under which the subsidy is alleged to constitute a financial contribution and under which it would be considered to be specific and, therefore, actionable. The complainant alleges that each identified program potentially confers an actionable or prohibited subsidy to producers and exporters of CISP in China. The documents that formed the basis for these allegations were appended to the complaint.²⁴

[82] Given that the complainant's principal evidence with respect to the subsidy programs availability and/or use by CISP producers/exporters in China consists of references to other countervailing investigations by either the CBSA, the USDOC or the European Commission, the CBSA reviewed the relevant public decision documents for these investigations.

[83] As a result, based on the information available, the CBSA identified 29 potentially actionable subsidy programs that may have benefited Chinese producers/exporters of CISP. Many of these are programs the CBSA has already countervailed in respect of previous subsidy investigations concerning goods from China. These programs have been grouped into the following five categories:

- a. Preferential Loans and Loan Guarantees;
- b. Grants and Grant Equivalents;
- c. Preferential Tax Programs;
- d. Relief from Duties and Taxes;
- e. Goods/Services Provided by the Government of China at Less than Fair Market Value

[84] The CBSA's analysis revealed that the alleged subsidy programs constitute potential financial contributions by the Government of China that may have conferred benefits to producers/exporters of CISP. In addition, the programs were further examined and were considered to be potentially specific either in law or in fact within the meaning of subsections 2(7.2) and 2(7.3) of SIMA.

[85] The descriptions of the identified programs to be investigated are found in the Subsidy RFI.

²² Exhibit 2 - CISP Complaint (NC), paras. 78-299

²³ Exhibit 2 - CISP Complaint (NC), paras. 75-260

²⁴ Exhibit 2 - CISP Complaint (NC), Public Exhibits 7-01 to 7-87

[86] If more information becomes available during the investigation process that indicates that some exporters/producers of subject goods may have benefited from any other programs during the POI, the CBSA will request complete information from the Government of China and exporters/producers of subject goods to pursue the investigation of these programs.

CBSA'S CONCLUSION

[87] Sufficient evidence is available to support the allegations that CISP originating in or exported from China have been subsidized. In investigating these programs, the CBSA has requested information from the Government of China, exporters and producers to determine whether exporters/producers of subject goods received benefits under these programs and whether these programs, or any other programs, are actionable subsidies and, therefore, countervailable under SIMA.

ESTIMATED AMOUNT OF SUBSIDY

[88] The complainant was unable to estimate the amounts of subsidy on a program basis for the subject goods imported from China. Instead, the complainant estimated the amount of subsidy as being equal to the difference between the estimated total cost of production and the weighted average export price for Chinese CISP.²⁵

[89] The CBSA estimated the amount of subsidy conferred to exporters of the subject goods from China by comparing the estimated full costs of the subject goods with their total estimated export prices, using the costing and export price methodologies explained in the "Evidence of Dumping" section.

[90] It is the CBSA's understanding that subsidies have the effect of lowering the cost of production of goods which allows exporters to pass-through the subsidy benefits in reducing the selling price of those goods to Canada. Therefore, the CBSA is satisfied that the exporter's ability to sell subject goods to Canada at prices substantially below their estimated costs supports the complainant's allegations that the imported goods are subsidized.

[91] The CBSA's analysis of the information indicates that subject goods imported into Canada during the period of April 1, 2024 to March 31, 2025 were subsidized and that the estimated amount of subsidy is 15.1% of the export price.

EVIDENCE OF INJURY

[92] The complainant alleged that the subject goods have been dumped and subsidized and that such dumping and subsidizing have caused and are threatening to cause material injury to the CISP industry in Canada.

[93] SIMA refers to material injury caused to the domestic producers of like goods in Canada. The CBSA has concluded that CISP produced by the domestic industry are like goods to the subject goods from China.

²⁵ Exhibit 2 - CISP Complaint (NC), paras. 248-250; Non-Confidential Exhibits 6-02 and 6-13.

[94] Given concerns with respect to the confidentiality of the information of the domestic producer, the CBSA is limited in its ability to discuss certain information contained in the complaint.

[95] In support of their allegations, the complainant provided evidence of:

- Increased volume of subject goods imported;
- Price undercutting;
- Price depression and price suppression;
- Adverse impact on market share, production, capacity utilization and inventory levels;
- Adverse impact on financial performance and profitability;
- Adverse impact on employment and wages; and
- Adverse impact on investment²⁶

INCREASED VOLUME OF SUBJECT GOODS IMPORTED

[96] The complainant alleges that imports of subject goods from China have increased on an absolute basis and relative to the complainant's domestic sales. To support their allegations, the complainant provided their estimates of CISP imports from 2021 to Q1 2025, using import data obtained from Statistics Canada.

[97] Based on Statistics Canada, the volume of subject goods imported increased from 3,398 MT in 2021 to 19,507 MT in 2024, representing an increase of 474%. Excluding 2021 as the base year, subject imports still increased by 95% between 2022 and 2024, despite a decrease in the absolute volume in 2023.²⁷ The complainant also notes elevated imports when comparing Q1 2025 to Q1 2024.

[98] The CBSA's analysis of import data supports the allegation of an increase in the import volume of the allegedly dumped and subsidized goods. Based on the CSBA's estimate of imports, from 2022 to 2024, the volume of imported goods from China increased by 77%. At the same time, imports from other countries dropped by 64%. The CBSA acknowledges the complainant's preference to consider a longer period for the injury analysis. In this respect, the CBSA notes a very substantial increase in imports of CISP from China of 244% between 2021 and 2024.

[99] Based on the above, the CBSA finds the complainant's claim of increased import volumes to be reasonable and well supported. The CBSA finds that the injury factor of an increased volume of subject goods is sufficiently supported and linked to the allegedly dumped and subsidized goods.

²⁶ Exhibit 2 – CISP Complaint (NC), paras. 252-292

²⁷ Exhibit 2 – CISP Complaint (NC), paras. 258-259

PRICE UNDERCUTTING

[100] The complainant alleges that subject imports have undercut complainant pricing. In support of this claim, the complainant presented a comparison of weighted average subject import pricing to complainant pricing as well as account specific examples.²⁸

[101] For purposes of comparing import pricing to the complainant's pricing, the complainant has relied on data from Statistics Canada in order to estimate the weighted average import pricing of subject goods from China. According to the complainant, it is reasonable to assume that the Statistics Canada import prices reflect landed prices, inclusive of ocean freight and other costs incurred to move the subject goods from the foreign point of direct shipment to Canada.²⁹

[102] The CBSA has examined the complainant's allegations of price undercutting by comparing the complainant's weighted average price per tonne for CISP to the CBSA's estimated weighted average unit import prices for subject goods. The CBSA's analysis supported the complainant's claims.

[103] Based on the CBSA's analysis of the information contained in the complaint, the CBSA finds the claim of price undercutting to be supported and sufficiently linked to the allegedly dumped and subsidized goods.

PRICE DEPRESSION AND PRICE SUPPRESSION

[104] The complainant submits that the price undercutting discussed above has resulted in price depression and price suppression. To support their claims, the complainant discussed trends in their average selling prices since 2021, submitting that the trends demonstrate price depression caused by subject imports. Further, the complainant referred to their prices and compared them to their costs of goods sold in order to support their claim of price suppression.³⁰

[105] Based on the information presented, the CBSA finds the claims of price depression and price suppression to be well supported and sufficiently linked to the allegedly dumped and subsidized goods.

ADVERSE IMPACT ON MARKET SHARE, PRODUCTION, CAPACITY UTILIZATION AND INVENTORY LEVELS

[106] The complainant alleges that the increasing volumes of dumped and subsidized subject imports have had an adverse impact on market share, production, capacity utilization and inventory levels.³¹

²⁸ Exhibit 2 – CISP Complaint (NC), paras. 265-268, Non-Confidential Exhibit 8-03

²⁹ Exhibit 2 – CISP Complaint (NC), para. 266

³⁰ Exhibit 2 – CISP Complaint (NC), paras. 269-275

³¹ Exhibit 2 – CISP Complaint (NC), paras. 277-279

[107] To support their claim, the complainant discussed market share trends from 2021 to Q1 2025 and provided information concerning their production, capacity utilization and inventory levels for the period of 2021 to Q1 2025.³²

[108] Based on the CBSA's analysis of the complainant's sales, production and capacity utilization information, as well as the CBSA's estimate of imports and market share, the CBSA finds the complainant's allegations of adverse impact on complainant market share, production, capacity utilization and inventory levels to be reasonable and well supported. As such, the CBSA is of the opinion that this injury factor is sufficiently supported and linked to the allegedly dumped and subsidized goods.

ADVERSE IMPACT ON FINANCIAL PERFORMANCE AND PROFITABILITY

[109] The complaint alleges that the dumped and subsidized goods have also had an adverse impact on the financial performance and profitability of the complainant. To support this allegation, the complainant provided a summary of their financial performance from 2021 to Q1 2025.³³

[110] The CBSA has reviewed the complainant's financial results and found that the information contained in the complaint generally establishes a trend of a worsening financial performance, thereby supporting the complainant's allegations of impacted financial performance and profitability.

ADVERSE IMPACT ON EMPLOYMENT, WAGES, AND OPERATIONS

[111] The complainant submits that the volume and price losses to subject imports have adversely effected domestic employment and wages. In support of these allegations, the complainant provided information concerning employment levels and wages.³⁴

[112] The available evidence in the complaint supports the complainant's claims of adverse impact on employment and wages. With respect to the allegation of an adverse impact on operations, the CBSA does not find the claim to be sufficiently explained. As such, absent other information to support a claim of adverse impacts to operations, the CBSA finds that sufficient support has only been provided for the injury factors of adverse impact on employment and wages and that this has reasonably linked to the allegedly dumped and subsidized goods.

³² Exhibit 2 – CISP Complaint (NC), para. 277-279

³³ Exhibit 2 – CISP Complaint (NC), paras. 280-286

³⁴ Exhibit 2 – CISP Complaint (NC), paras. 287-288

ADVERSE IMPACT ON INVESTMENT AND ABILITY TO RAISE CAPITAL

[113] The complainant alleges that the subject imports have put the complainant's investments at risk. Specifically, the complainant notes investments approved by its parent company, McWane, Inc., between 2022 and 2024, and submits that the return on this investment is in jeopardy due to the unfairly priced subject imports from China.³⁵

[114] The available evidence supports the complainant's claim of an adverse effect on existing investments. The CBSA finds that this injury factor is sufficiently supported and reasonably linked to the allegedly dumped and subsidized goods. The CBSA also acknowledges a risk of future investments and future ability to raise capital but, in light of the investments discussed in the complaint, does not find that the complainant has sufficiently demonstrated existing injury in the form of adverse impact on ability to raise capital. The CBSA does, however, recognize a potential threat of injury to exist in this respect.

CBSA'S CONCLUSION - INJURY

[115] Overall, based on the evidence provided in the complaint, and supplementary data available to the CBSA through its own research and customs documentation, the CBSA finds that the evidence discloses a reasonable indication that the dumping and subsidizing of the subject goods from China, have caused injury to the CISP industry in Canada in the form of :

- Increased volume of subject goods imported;
- Price undercutting;
- Price depression and price suppression;
- Adverse impact on market share, production, capacity utilization and inventory levels;
- Adverse impact on financial performance and profitability;
- Adverse impact on employment and wages; and
- Adverse impact on investment.

THREAT OF INJURY

[116] The complainant alleges that the dumped and subsidized goods threaten to cause further material injury to the domestic producers of CISP over the next 12 to 24 months and provided information to support the allegation that imports of subject goods threaten to cause further injury to the Canadian industry.

[117] In light of the CBSA's finding that there is a reasonable indication that the dumping and subsidizing of the subject goods has caused injury, the CBSA will exercise administrative efficiency and not address whether there is a reasonable indication that the dumping and subsidizing of the subject goods is threatening to cause injury.

³⁵ Exhibit 2 – CISP Complaint (NC), paras. 289-290

CAUSAL LINK - DUMPING/SUBSIDIZING AND INJURY/THREAT OF INJURY

[118] The CBSA finds that the complainant has sufficiently linked the injury it has suffered to the alleged dumping and subsidizing of the subject goods imported into Canada. This injury includes increased volume of subject goods imported; price undercutting, price depression and price suppression, adverse impact on market share, production, capacity utilization and inventory levels, adverse impact on financial performance and profitability, adverse impact on employment and wages; and adverse impact on investment.

[119] In summary, the CBSA is of the opinion that the information provided in the complaint has disclosed a reasonable indication that the alleged dumping and subsidizing have caused injury to the Canadian domestic industry.

SCOPE OF THE INVESTIGATIONS

[120] The CBSA is conducting investigations to determine whether the subject goods have been dumped and/or subsidized.

[121] The CBSA has requested information from all potential exporters and importers to determine whether or not subject goods imported into Canada during the POI of April 1, 2024 to March 31, 2025 were dumped and/or subsidized. The information requested will be used to determine the normal values, export prices, margins of dumping, if any. The CBSA also requested information from the Government of China with respect to the possibility that the conditions of section 20 of SIMA exist in the iron pipe sector in China.

[122] The CBSA has also requested information from the Government of China and all potential producers/exporters to determine whether or not subject goods imported into Canada during the POI of April 1, 2024 to March 31, 2025 were subsidized. The information requested will be used to determine the amounts of subsidy, if any.

[123] All parties have been clearly advised of the CBSA's information requirements and the time frames for providing their responses.

FUTURE ACTION

[124] The CITT will conduct a preliminary inquiry to determine whether the evidence discloses a reasonable indication that the alleged dumping and subsidizing of the goods has caused or is threatening to cause injury to the Canadian industry. The CITT must make its decision on or before the 60th day after the date of the initiation of the investigations. If the CITT concludes that the evidence does not disclose a reasonable indication of injury to the Canadian industry, the investigations will be terminated.

[125] If the CITT finds that the evidence discloses a reasonable indication of injury to the Canadian industry and the CBSA's preliminary investigations reveals that the goods have been dumped and/or subsidized, the CBSA will make preliminary determinations of dumping and/or subsidizing within 90 days after the date of the initiation of the investigations, by October 9, 2025. Where circumstances warrant, this period may be extended to 135 days from the date of the initiation of the investigations.

[126] Under section 35 of SIMA, if, at any time before making a preliminary determination, the CBSA is satisfied that the volume of goods of a country is negligible, the investigations will be terminated with respect to goods of that country.

[127] Imports of subject goods released by the CBSA on and after the date of a preliminary determination of dumping and/or subsidizing, other than goods of the same description as goods in respect of which a determination was made that the margin of dumping of, or the amount of subsidy on, the goods is insignificant, may be subject to provisional duty in an amount not greater than the estimated margin of dumping and/or the estimated amount of subsidy on the imported goods.

[128] Should the CBSA make a preliminary determination of dumping and/or subsidizing, the investigation will be continued for the purpose of making a final decision within 90 days after the date of the preliminary determination.

[129] After the preliminary determination, if, in respect of goods of a particular exporter, the CBSA's investigations reveals that imports of the subject goods from that exporter have not been dumped or subsidized, or that the margin of dumping or amount of subsidy is insignificant, the investigation(s) will be terminated in respect of those goods.

[130] If final determinations of dumping and/or subsidizing are made, the CITT will continue its inquiry and hold public hearings into the question of material injury to the Canadian industry. The CITT is required to make a finding with respect to the goods to which the final determinations of dumping and/or subsidizing apply, not later than 120 days after the CBSA's preliminary determinations.

[131] In the event of an injury finding by the CITT, imports of subject goods released by the CBSA after that date will be subject to anti-dumping duty equal to the applicable margin of dumping and countervailing duty equal to the amount of subsidy on the imported goods. Should both anti-dumping and countervailing duties be applicable to subject goods, the amount of any anti-dumping duty may be reduced by the amount that is attributable to an export subsidy.

RETROACTIVE DUTY ON MASSIVE IMPORTATIONS

[132] When the CITT conducts an inquiry concerning injury to the Canadian industry, it may consider if dumped and/or subsidized goods that were imported close to or after the initiation of the investigations constitute massive importations over a relatively short period of time and have caused injury to the Canadian industry.

[133] Should the CITT issue such a finding, anti-dumping and countervailing duties may be imposed retroactively on subject goods imported into Canada and released by the CBSA during the period of 90 days preceding the day of the CBSA making preliminary determinations of dumping and/or subsidizing.

[134] In respect of importations of subsidized goods that have caused injury, however, this provision is only applicable where the CBSA has determined that the whole or any part of the subsidy on the goods is a prohibited subsidy, as explained in the previous “Evidence of subsidizing” section. In such a case, the amount of countervailing duty applied on a retroactive basis will be equal to the amount of subsidy on the goods that is a prohibited subsidy.

UNDERTAKINGS

[135] After a preliminary determination of dumping by the CBSA, other than a preliminary determination in which a determination was made that the margin of dumping of the goods is insignificant, an exporter may submit a written undertaking to revise selling prices to Canada so that the margin of dumping or the injury caused by the dumping is eliminated.

[136] Similarly, after the CBSA has rendered a preliminary determination of subsidizing, a foreign government may submit a written undertaking to eliminate the subsidy on the goods exported or to eliminate the injurious effect of the subsidy, by limiting the amount of the subsidy or the quantity of goods exported to Canada. Alternatively, exporters with the written consent of their government may undertake to revise their selling prices so that the amount of the subsidy or the injurious effect of the subsidy is eliminated.

[137] An acceptable undertaking must account for all or substantially all of the exports to Canada of the dumped or subsidized goods. Interested parties may provide comments regarding the acceptability of undertakings within nine days of the receipt of an undertaking by the CBSA. The CBSA will maintain a list of parties who wish to be notified should an undertaking proposal be received. Those who are interested in being notified should provide their name, telephone number, mailing address and email address to the email address identified in the “Information” section of this document.

[138] If undertakings were to be accepted, the investigation and the collection of provisional duties would be suspended. Notwithstanding the acceptance of an undertaking, an exporter may request that the CBSA’s investigation be completed and that the CITT complete its injury inquiry.

PUBLICATION

[139] Notice of the initiation of these investigations is being published in the Canada Gazette pursuant to subparagraph 34(1)(a)(ii) of SIMA.

INFORMATION

[140] Interested parties are invited to file written submissions presenting facts, arguments, and evidence that they feel are relevant to the alleged dumping and subsidizing. Written submissions should be forwarded to the attention of the SIMA Registry and Disclosure Unit.

[141] To be given consideration in these investigations, all information should be received by the CBSA by November 17, 2025, at noon.

[142] Any information submitted to the CBSA by interested parties concerning these investigations is considered to be public information unless clearly marked “confidential”. Where the submission by an interested party is confidential, a non-confidential version of the submission must be provided at the same time. This non-confidential version will be made available to other interested parties upon request.

[143] Confidential information submitted to the CBSA will be disclosed on written request to independent counsel for parties to these proceedings, subject to conditions to protect the confidentiality of the information. Confidential information may also be released to the CITT, any court in Canada, or a WTO or Canada-United States-Mexico Agreement (CUSMA) dispute settlement panel. Additional information respecting the CBSA’s policy on the disclosure of information under SIMA may be obtained by contacting the CBSA at the email address identified below or by visiting the CBSA’s website.

[144] The schedule of the investigations and a complete listing of all exhibits and information are available on CBSA’s [Dumping and subsidy investigations](#) webpage. The exhibit listing will be updated as new exhibits and information are made available.

[145] This *Statement of Reasons* is available through the CBSA’s website at the address below. For further information, please contact CBSA at:

Email: simaregistry-depotlmsi@cbsa-asfc.gc.ca

Website: www.cbsa-asfc.gc.ca/sima-lmsi

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