



July 29, 2016

Mr. Rand McNally  
Manager, Programs Branch  
Trade and Anti-dumping Programs Directorate  
222 Queen Street, 9<sup>th</sup> Floor  
Ottawa, ON K1A 0L8

Dear Mr. McNally:

**Re: Certain Fabricated Industrial Steel Components**

I am the President & CEO of the Canadian Institute of Steel Construction (“CISC”) and have held this position since 2009. My responsibilities are for the leadership and strategic direction of the CISC and our industry. I report to the CISC Board of Directors.

I have been in the structural steel industry for 31 years. My past experience includes:

- estimator and project manager for a steel fabricator
- steel, welding and coating inspector (consultant)
- welding engineering consultant
- welding certification manager for Canadian Welding Bureau involved in Canadian and international company certification
- general manager for ISO Registrar (CWB Group) accredited by Standards Council of Canada (SCC)
- general manager for weld education division (CWB Group)
- VP Business Development for CWB Group

I am currently active in the following:

- Fabrication Chair for ISO TC167 WG 3 (Steel and Aluminum Structures)
- Chair for CSA G40.20/.21 (Construction Steels)
- Canadian Delegate to ASTM A01 (Steels)
- Canadian Delegate to ASTM F16 (Bolts and fasteners)
- Canadian Delegate to IIW (International Institute of Welding)

The CISC is Canada’s voice for the steel construction industry, providing leadership in design and construction efficiency, quality and innovation. The CISC promotes the use and benefits of steel in construction, adds value to the construction and design community and supports the needs of the membership and industry through education and training, research and development, industry codes and standards, certification, and advocacy. Our membership and associates consist of all stakeholders in the

Canadian steel construction industry including steel fabricators, steel mills, erectors, detailers, steel service centres, suppliers, engineers, contractors, unions, students and professors.

I am writing this letter in support of the complaint being filed by Supreme Group (“**Supreme**”), Waiward Steel LP (“**Waiward**”), and Supermetal Structures Inc. (“**Supermetal**”) (collectively, “**the Complainants**”) regarding the dumping and subsidization of Certain Fabricated Industrial Steel Components (“**FISC**”) in Canada.

This Complaint is supported by MacDougall Steel Erectors Inc., MQM Quality Manufacturing Ltd., Ocean Steel and Construction Ltd., and Walters Inc. To my knowledge, the following other companies may also produce FISC in Canada:

ADF Group Inc., 300, Henry-Bessemer, Terrebonne, Quebec J6Y 1T3;

Burnco Mfg Inc., 40 Citron Ct, Vaughan, ON L4K;

Canam Group Inc., 270 Chemin du Tremblay, Boucherville, QC J4B 5X9

Coastal Metals Ltd., 430 Industrial St, Beresford, NB E8K 2C2;

Beauce Atlas Steel Fabricators, 600, 1re Avenue, Parc industriel, Sainte-Marie de Beauce, Québec, G6E 1B5;

IWL Steel Fabricators LP, 817 50 St E, Saskatoon, SK S7K 3Y5;

Proco Constructions Inc., 516 route 172, Saint-Nazaire, QC G0W 2V0;

Saskarc Fabrication, 2 Marconi Road – P.O. Box 990 Oxbow, Saskatchewan Canada S0C 2B0;

Structures G B Ltée, 105 Industrielle-Et-Commerciale, Rimouski, QC G5M 1A8 (the “**Other Producers**”).

There are no statistics on the volume or value of FISC production in Canada or the Canadian FISC market. However, in my capacity as President & CEO of CISC, I have detailed knowledge of the Canadian FISC market and Canadian FISC producers and I am in a position to provide an informed estimate as to the size of the Canadian market for FISC. I estimate that the Complainants and MacDougall Steel Erectors Inc., Ocean Steel and Construction Ltd., and Walters Inc. represent approximately 80% of Canadian FISC production for 2013 through the first-quarter of 2016. It follows that that Other Producers and MQM Quality Manufacturing Ltd. represented approximately 20% of Canadian FISC production.

Yours truly,



Edward Whalen, P.Eng.  
President & CEO