



Delivered by Email

Date: 8/5/2020

Non-confidential version

Mr. Aaron Maidment
Industrial Products Division
Trade and Anti-dumping Programs Directorate
Canada Border Services Agency
222 Queen Street, 9th Floor
Ottawa, ON K1A 0L8

Dear Mr. Maidment:

Subject: Saha Thai Steel Pipe - certain carbon steel welded pipe originating in or exported from Chinese Taipei, the Republic of India, the Sultanate of Oman, the Republic of Korea, and Thailand

This is a request that CBSA initiate a company-specific review of normal values for Saha Thai Steel Pipe. The existing normal values issued by CBSA were issued in 2013 and in 2017 (respecting certain products subject to an importer request for re-determination).

The normal values in effect do not represent current pricing and costs in the Thai domestic market and pricing to our customers in Canada. Having been in effect for seven years for some products, the current normal values are in need of revision.

In support of our request, we submit on a confidential basis:

- Confidential SahaThai NV request data.xlsx

This spreadsheet contains two tabs:

- Thai-Cdn pricing by quarter
- NVs in effect

**[The spreadsheet (including the tabs) was submitted on a confidential basis only. The data contained in the spreadsheet includes confidential pricing and costing information and specific normal values in effect for our company. We consider the information contained in the spreadsheet commercially sensitive. Release of such information could provide advantage to the company's competitors to the*

*financial detriment of Saha Thai Steel Pipe. We provide a non-confidential summary of the information provided in the spreadsheet.] **

In the **Thai-Cdn pricing by quarter tab**, the company presents data comparing company average domestic and Canadian pricing and costs by quarter during the 2017-2019 period on a confidential basis. Since Q-4 2018, average Canadian pricing exceeded average domestic pricing significantly. During the same period, our unit production costs declined consistently in each quarter, which is consistent with general steel price and cost reductions worldwide. It also reflected an ability to sell at or above normal values in effect during the period. As pricing/costs decline, our customers have resisted pricing based on the current normal values in effect.

In the **NVs in Effect tab**, the company presents the normal values in effect on a product-by-product basis and the effective date of issuance of these values. The normal values in effect since 2017 reflect those specific products included in the importer's request for determination. The CBSA refused to update the normal values of all Saha Thai's subject products during the 2017 review, but restricted the review to only those subject products in the sale subject to the specific request for re-determination.

Review of the normal values issued in 2013 against the normal values issued as a result of the request for re-determination in 2017 reveal just how out of date the 2013 normal values are. Average normal values in effect that were issued in 2013 were **[normal value information deleted] ** while normal values in effect that were issued in 2017 averaged **[normal value information deleted] **. This is a significant difference.

We have also included our current costs and Canadian pricing on a product basis. While costs of the 2013 and 2017 products are similar, the normal values in effect for the 2013 products result in uncompetitive pricing. Current Canadian pricing of the 2017 products exceed the existing normal values for these products.

We believe the foregoing demonstrates a reasonable need to conduct a company-specific normal value review. Should additional information be required to support our request for a re-investigation, we would be pleased to submit any information you consider necessary.

Yours truly,



Methita Rachrongmuang
Saha Thai Steel Pipe

cc: Andy Bradley – Bradley Trade Consulting