



SIMA Registry and Disclosure Unit
Trade and Anti-dumping Programs Directorate
Canada Border Services Agency
100 Metcalfe Street, 11th Floor
Ottawa, Ontario K1A 0L8
Canada

**Centre de dépôt et de communication des
documents de la LMSI**
Direction des programmes commerciaux et
antidumping
Agence des services frontaliers du Canada
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Submission received electronically

Soumission reçu électroniquement

Submission Date /
Date de soumission

August 18, 2023

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NON-CONFIDENTIAL

18 August 2023

VIA EMAIL

Canada Border Services Agency
Anti-dumping and Countervailing Directorate
100 Metcalfe Street, 11th Floor
Ottawa, ON
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Dear Sirs/Mesdames:

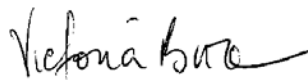
Re: Carbon Steel Welded Pipe – Borusan Mannesmann Boru – Request for Normal
Value Review

I write on behalf of Borusan Mannesmann Boru (“BMB”) to request that CBSA initiate a review of normal values for carbon steel welded pipe (“CSWP”). Current normal values, which were determined on 10 May 2023 were based on BMB’s costs or production during a period of investigation ending in November/December 2021.

On average, hot-rolled coil (“HRC”) makes up 85% of the total cost of production of CSWP. Data published by SteelOrbis indicate that HRC prices declined approximately [] between November/December 2021 and July 2023 (See Attachment 1). Similarly, BMB’s purchase prices of domestic HRC have declined approximately [] over the same period (see Attachment 2). Both Attachments show that HRC prices have decreased significantly since the period over which current normal values were determined. Normal values currently in place do not reflect market conditions and, in effect, represent the imposition of duties in excess of the margin of dumping of goods that might be exported at this time contrary to Article 9.3 of the WTO Antidumping Agreement and in excess of the duties that may be imposed under Section 3 of the *Special Import Measures Act*.

BMB would be pleased to provide any additional information that CBSA may require to ensure that the measures currently in place are in accordance with Canadian legislation and Canada’s obligations under the trade agreements.

Yours very truly,



Victoria Bazan

ATTACHMENT 1

SteelOrbis HRC Selling Prices

(subject to copyright)

ATTACHMENT 2

BMB Domestic HRC Purchase Prices

Contains confidential information the disclosure of which would be prejudicial to BMB