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NON-CONFIDENTIAL

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SIMA Registry and Disclosure Unit
Trade and Anti-Dumping Programs Directorate
Canada Border Services Agency
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Re: Imex Canada Inc., submission regarding Tenaris Canada's request for re-investigation of OCTG 1 and Seamless Casing anti-dumping findings ex China.

Imex Canada Inc as an importer of the subject goods ex China strongly opposes the request for reinvestigation of OCTG1 and Seamless Casing anti-dumping findings ex China.

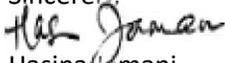
Tenaris once again seeks to instrumentalize CBSA to create an anti-competitive OCTG market in Canada.

As can be seen from the last five-year trade data online, (see attachment 1), the single largest exporter of products categorized under HS730429 to Canada is the Tenaris Group of companies. Except for the year 2022, the Tenaris Group of Companies was the largest competitor to the Canadian domestic industry, not China. The Tenaris Group of Companies exports said products (HS730429) to Canada from its facilities in Argentina, Brazil, Mexico, USA, Italy, etc.

The Tenaris Group of Companies "carved out" an overwhelming (anti-competitive) dominance of the Canadian OCTG market with their exports to Canada and their domestic production.

Pipe Logix reflects the market prices in North America and was chosen as a benchmark as such by CBSA with encouragement from Tenaris. Now that the pricing has moved lower (which is a typical market trend), reflected by Pipe Logix, Tenaris suddenly sees its overdominance of the Canadian OCTG market threatened and seeks to instrumentalize CBSA to manipulate the market to Tenaris's benefit, by limiting competition from China.

We hope CBSA will strongly take into consideration our opposition to Tenaris' representation to re-investigate OCTG1 and Seamless Casing anti-dumping findings ex-China.

Sincerely,

Hasina Samani
VP Operations

Encl: Attachment 01