



***RC International Trade Consultants***

*Specialists in Canadian Anti-dumping and Countervailing Laws*

**SUBMITTED ELECTRONICALLY**

**Non- Confidential Version**

May 30, 2024  
Sima Registry and Disclosure Unit  
Trade and Anti-Dumping Programs Directorate  
Canada Border Services Agency  
100 Metcalfe Street, 11<sup>th</sup> Floor  
Ottawa, Ontario K1A 0L8

Dear Sir or Madam

**Re: Request for a Normal Value Review - CSWP 2 – Carbon Steel Welded Pipe**

**ATTACHMENT 1** is an authorization letter appointing RC International Trade Consultants (RCITC) as Counsel to Thai Premium Pipe Co., Ltd. (TPP), Thailand.

On behalf of our client, TPP, I am formally requesting the Canada Border Services Agency (CBSA) to initiate an exporter-specific normal values review for the CSWP 2 enforcement of the Canadian International Trade Tribunal's (CITT) order issued on October 15, 2018, in Expiry Review No. RR-2017-005, regarding the dumping of certain carbon steel welded pipe from the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu (Chinese Taipei), India, Oman, South Korea, Thailand, and the United Arab Emirates, as per the Special Import Measures Act (SIMA).

This request is made under the provisions outlined in paragraph 2 of Memorandum D14-1-8, which states:

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2. Re-investigations and normal value reviews are administrative proceedings conducted to update values; establish values for new products or models subject to the measures in force; and establish values for exporters that do not currently have values.

TPP is an exporter of CSWP to Canada but does not have normal values. During [REDACTED], the company exported [REDACTED] shipments of CSWP to [REDACTED]. Proof of exportation is contained in **confidential ATTACHMENTS 2 & 3.**

Because TPP did not have normal values at the time of importation, the liability for SIMA duties would have been determined under a Ministerial specification and subject to an anti-dumping duty equal to 54.2% of the export price.

In the circumstances, since TPP, a company committed to fair trade practices, does not have normal values for its Carbon Steel Welded Pipe (CSWP) produced in Thailand, the company is seeking to establish normal values so that it can continue to participate in the Canadian CSWP market at fairly traded prices without harming the domestic CSWP industry.

TPP, located at 45 Moo 2 Chaimongkol, Muang Samut Sakhon, Samut Sakhon province, 74000 Thailand, was established in July 2002 as a limited liability company (**ATTACHMENT 4**).

TPP manufactures steel pipes and tubes [REDACTED]. The company's major export markets are [REDACTED], where it markets its CSWP at fairly traded prices.

TPP is one of the leading ERW steel pipe manufacturers in Thailand. The company offers steel pipes of different international standards in round, square, and rectangular shapes and made-to-order ones, such as cut-to-length and anti-oxidant coating.

TPP can produce pipe sizes ranging from 15.0 mm outside diameter through 165.0 mm and Wall Thicknesses up to 6.0 mm to ASTM, AS, BS, EN, and JIS standards. Specifically, TPP produces CSWP to [REDACTED].

Further information on the company and its products is in the company's brochure in **ATTACHMENT 5**.

In closing, we would appreciate it if our request for an exporter-specific normal value review for TPP was initiated promptly. Normal values issued as a result of such a review would reflect current market conditions and enable TPP to export its CSWP at fairly traded prices, therefore causing no harm to the Canadian Industry.

Yours truly

A handwritten signature in black ink, appearing to read 'Richard Chung', with a stylized flourish at the end.

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