



## Contributor Anti-Dumping Questionnaire

### Transition review of anti-dumping measures

#### Case TD0001: Certain welded tubes and pipes of iron or non-alloy steel originating in the Republic of Belarus, the People's Republic of China and the Russian Federation

Case reference number:	TD0001
Period of Investigation (POI):	1 January 2019 to 31 December 2019
Injury period:	1 January 2016 to 31 December 2019
Deadline for response:	27 April 2020
Contact details:	Maria Lopez, TD0001@traderemedies.gov.uk
Completed on behalf of:	<b>CHINA CHAMBER OF INTERNATIONAL COMMERCE</b>



## SECTION A: General information

### Identity and contact details

- Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Name (point of contact):	[Confidential Treatment Requested – Personal Information]
Address:	No.2, Huapichang Hutong, Xicheng District, Beijing 100035, China
Telephone No:	[Confidential Treatment Requested – Contact Information]
Email:	[Confidential Treatment Requested – Contact Information]
Website:	<a href="http://www.ccoic.cn/">http://www.ccoic.cn/</a>
Legal name of organisation:	China Chamber of International Commerce
Legal structure (e.g. professional association, corporation, partnership, sole trader, limited company):	Professional association
Position in the organisation:	Legal Representative
Year of establishment:	1988
Other operating names:	None

- If you are representing a company, please also fill in the information below:

Company registration number:	[Confidential Treatment Requested – Business Proprietary Information]
Place of registration:	No.2, Huapichang Hutong, Xicheng District, Beijing 100035, China

- Please explain in the box below what is your interest in this review (e.g. you a consumer of an end product that is made using the like good and/or good subject to review).

On behalf of Chinese producers and exporters involved in the subject-referenced investigation, CHINA CHAMBER OF INTERNATIONAL COMMERCE (CCOIC) would like to respectfully request registries to the subject-referenced investigation, serves as consultant, legally supports international trade through co-operation with international organizations and authorities, assists members with protection of their rights abroad (trade lobbying), legal support.



## SECTION B: Information relevant to this review

For each question that follows, please provide any information you feel is relevant to this review, providing supporting evidence where appropriate. If you do not have such information, please state so in your answer:

1. Please provide any information regarding the goods subject to review you might consider relevant to this transition review:

None

Appendix reference:

2. Please explain if you consider that the existing anti-dumping measures for the goods subject to review are necessary or sufficient to offset dumping.

We would like to draw attention of the Ministry to the fact that the current measures has implemented for nearly 20 years. With the protection of high anti-dumping duties, Chinese Product has rarely entered the EU market, even a few products has entered the UK market.

In addition, we kindly ask the Ministry to take into consideration the influence of current measures, it not only has an effect on the existing market, but will also affect the UK's downstream industries in the long-term global procurement of the products involved.

Especially during the period 2015-2019, major changes have taken place in the international steel market, and the prices of Welded Pipes have also undergone great changes. At same time, the UK market as a single market also needs to be evaluated separately, so these tax rate changes are not compatible with existing anti-dumping duties.

In the past 20 years, the domestic industry in the United Kingdom has been establish a good market size and channels, and there is no need to implement anti-dumping measures. On the contrary, as a single market, if the UK continues to prevent Chinese products from entering the UK market to participate in competition, it may lead to the monopoly of the British industry. Therefore, British companies participating in international competition will contribute to the healthy development of the industry.

Appendix reference:



3. Please provide any information which you think could assist the assessment of the likelihood of dumping occurring if the existing anti-dumping measures for the goods subject to review no longer applied.

CCOIC believes that withdrawing the current measures will not result in dumping.

According to EUROSTAT statistics (Figure 1), from 2010 to 2019, the import price of Chinese products is not directly related to the taxation. The reason why the unit price of imports varies greatly, is related to the changes in the prices of steel raw materials in the world. Since China's steel production capacity accounts for 51% of the world's steel production capacity, which means China's raw material price level is already close to that of world steel products. The price of China's steel raw materials is already sufficient to affect the world steel product prices.

Due to the Chinese government has actively carried out policies such as environmental protection governance and capacity reduction after the world's steel surplus in 2015, the price of China's steel raw materials has changed rapidly.

Until 2016, the satisfaction of China's domestic market prices and domestic downstream demand were much higher than those of the international market. From 2016 to 2017, the huge domestic profits of welded pipe products led to the reluctance of Chinese companies to export. Therefore, China's welded pipe export prices have skyrocketed and the number of exports has declined.

With the transition from 2018 to 2019, the price of steel pipe have basically returned to normal levels. This phenomenon shows that the export price of Chinese products changes with the change of raw material prices, and changes with the changes in China's domestic market and international market demand.

After Brexit, as a new overseas market, is generally not in great demand in the UK domestic market. It is neither necessary for dumping nor likely to have excessive market opportunities. Therefore, Chinese companies will adjust the export prices in consideration of the needs and profits of the UK market, and its unlikely to seize the market at prices lower than normal. This is also the reason why Chinese companies have not involved in dumping defenses and entrusted industry defenses in this response one of the reasons.

Welded pipes are the main material for infrastructure construction. Therefore, large-scale welded pipes are required by size construction. With the impact of 2019-nCoV in the global economy, China's new economic stimulus policy also highlights the need to increase domestic new infrastructure and expand domestic demand. Therefore, in the next 2-3 years, domestic demand in China will expand.

In terms of exports, China's welded pipe export areas are mainly Asia, its accounting for about 60% of total exports, followed by Africa and South America. In 2019, China exported 2.533 million tons of welded pipes to the countries along the Belt and Road,



accounting for 59.5% of the total exports, and 1.37 million tons of welded pipes to ASEAN countries, accounting for 34.6% of the total exports.

It can be seen that the EU and the UK are not the main export destinations for Chinese welded pipes (Figures 2 and 3). Chinese companies are also unlikely to have excess capacity or large inventories to dump the British market.

Appendix reference: Figure 1-3

4. Please provide any relevant information if you consider that there would be injury to the UK industry if the existing anti-dumping measures for the goods subject to review no longer applied.

CCOIC believes that the withdrawal of existing measures will not cause damage to the British industry.

According to Figure 4, the UK imports from China from 2010 to 2019 are minimal, but the UK imports from countries outside of the EU are still relatively large. It reached nearly 18,000 tons in 2015, and reached more than 10,000 tons in 2019.

The main competitors for Chinese companies importing are not British companies, but importers from third countries. We believe that if anti-dumping duties are abolished, while the product quality of Chinese companies is good and the sales price has an advantage, we will form a competitive relationship with imports from third countries. This will also enrich the variety and specifications of the British domestic market, but will not affect the British local companies.

Appendix reference: Figure 4

5. Please provide any information you might consider relevant regarding the economic effects on the UK of the existing anti-dumping measures for the goods subject to review.

CCOIC believes that Chinese welded pipe products are mainly used to meet domestic demand which also have high and profitable domestic product prices.

The global outbreak of the 2019-nCoV has added uncertainty to the demand for welded pipes. At the same time, the economic growth of emerging countries and economies still has greater momentum. As mentioned above, the export regions of Chinese welded pipe products are Asian, African and Latin American countries.

Appendix reference:



6. Please provide any other information you consider relevant to this review:

In recent years, thanks to the supply-side reform of the Chinese steel industry and the elimination of backward production capacity, the profitability of China's steel products has steadily increased.

Due to the increase in demand for steel in real estate, infrastructure and other fields, it can be seen that China's domestic demand is very strong, so steel products are mainly used to meet domestic demand, and exports are shifting year by year. As a small variety in the steel field, the export volume of welded pipes will inevitably also drop significantly.

According to customs data, exports of welded pipes showed a downward trend year after year after reaching 1427.7 seconds earlier in 2016. In 2018, the decline was the most obvious. The previous export of welded pipe was only 395.4 inches, followed by a decrease of 67.2%. The total exports of welded pipes in 2019 was same as in 2018.

Appendix reference:



Appendix

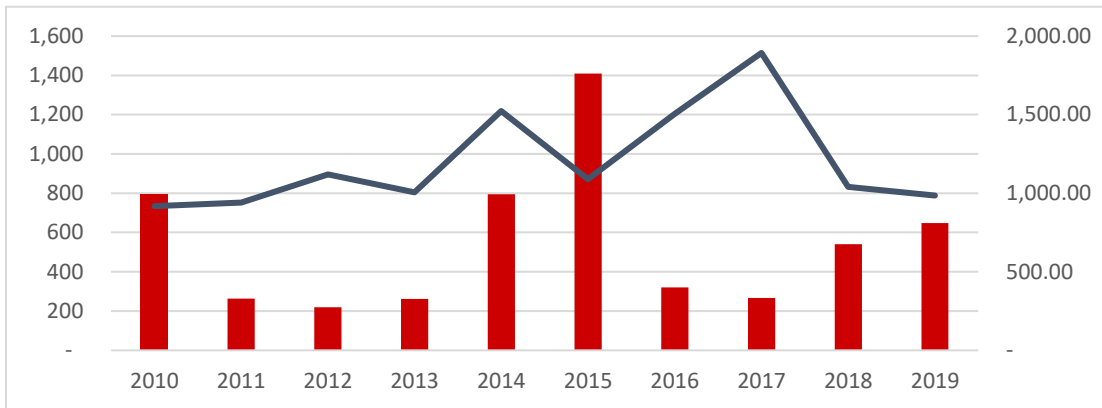


Figure 1: EUROSTAT

2018-2019 China's exports and rankings of welded pipes to various continents (Unit: tons)

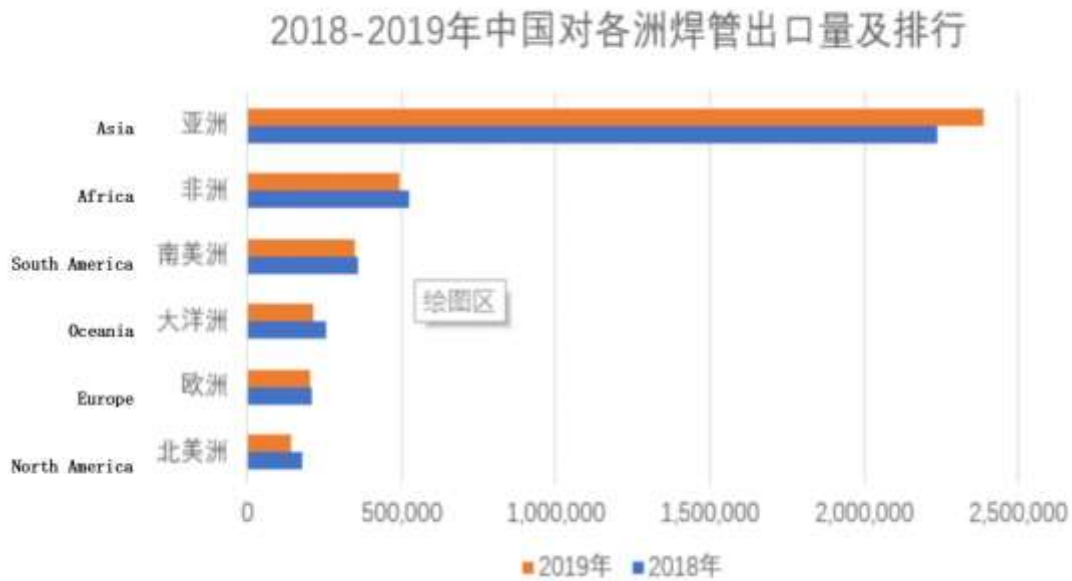
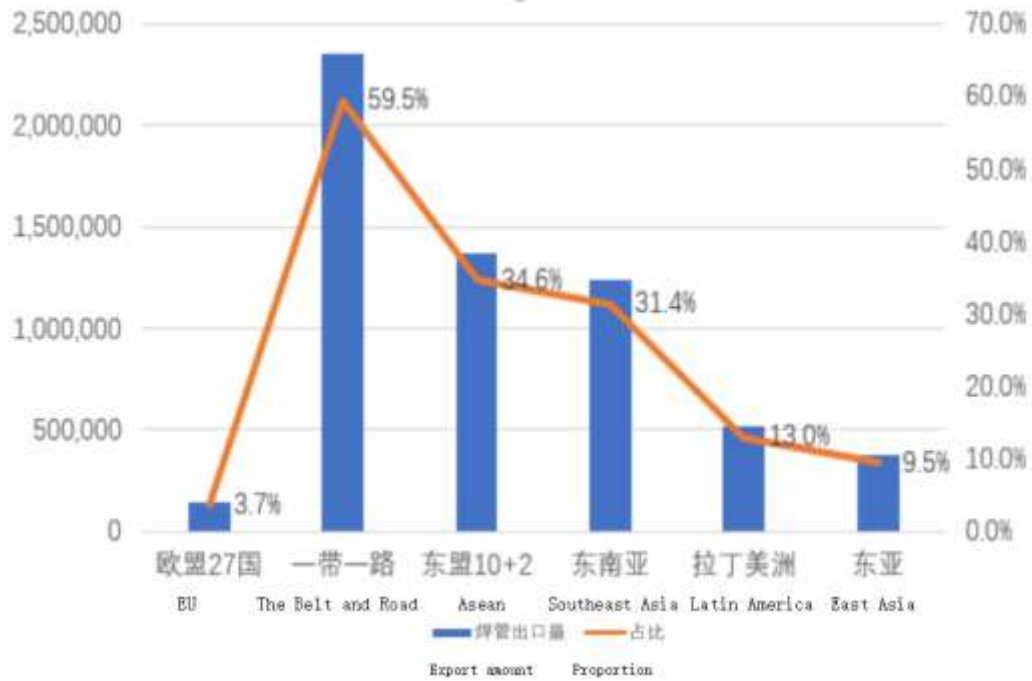


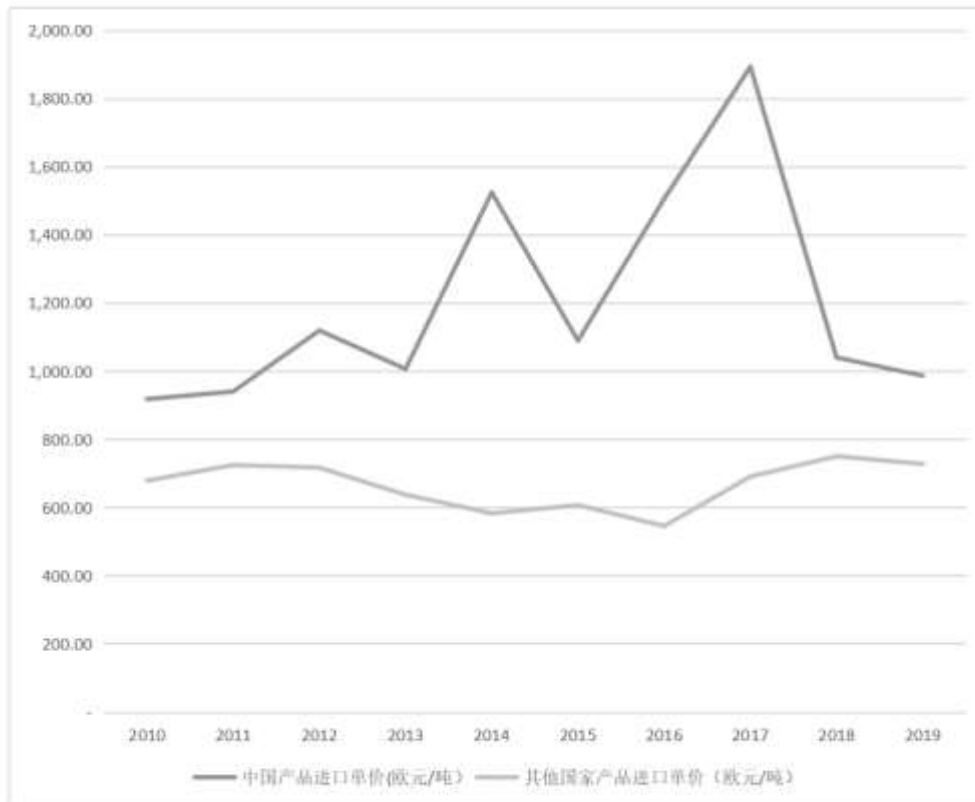
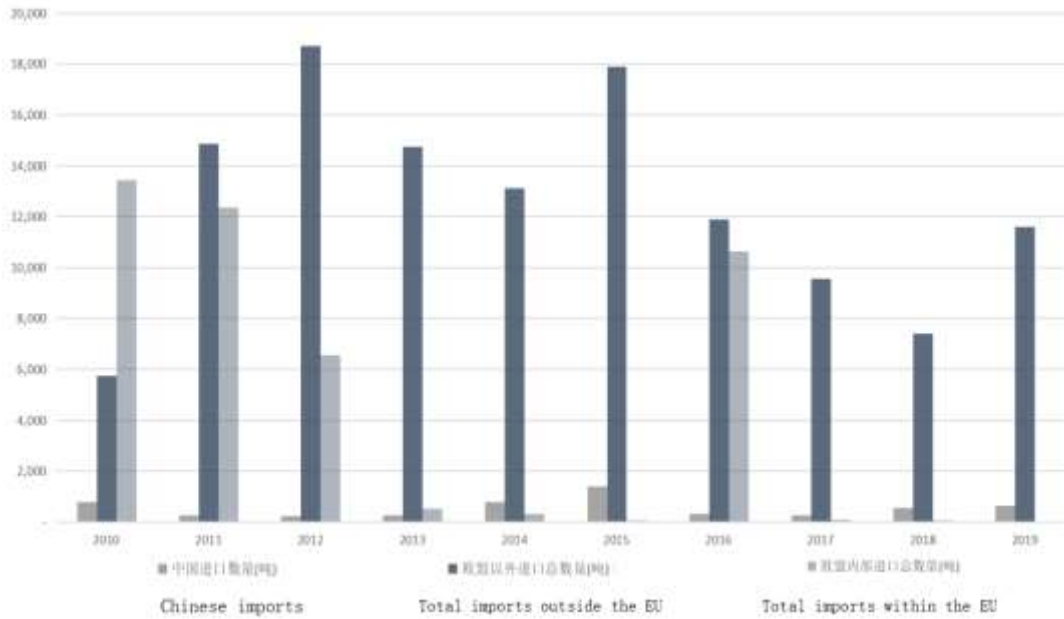
Figure 2: 2018-2019 China's export volume and rankings of welded pipes to various continents



Figure

3: 2019 China's export volume and proportion of welded pipes to major economies  
(Unit: Ton,%)





Unit price of imported Chinese products

Unit price of imports from other countries

Figure 4: EUROSTAT



## Declaration

By signing this declaration, you agree that all information supplied in this questionnaire is complete and correct to the best of your knowledge and belief and understand that the information submitted may be subject to verification by TRID.

Organisation's name: China Chamber of International Commerce  
Company registration number (if applicable): [Confidential Treatment Requested – Business Proprietary Information]

26 April 2020

Date



Organisation's Stamp

Signature of authorised official

[Confidential Treatment Requested  
– Personal Information]  
Legal Representative

Name and title of authorised official