



Department for
International Trade

Trade Remedies
Investigations
Directorate
21-23 Valpy Street
Reading
RG1 1AF

[Address redacted]

21 July 2020

Dear [Name redacted],

RE: TD0001 – Welded Tubes and Pipes from, inter alia, Belarus – response to letter dated 1st July 2020.

Thank you for your letter dated the 1st of July 2020.

We note the further explanations you have provided to explain why your client has not been able to provide the information we requested in our questionnaire and subsequent deficiency notices.

After considering all the information you have provided on behalf of your client to date, we are unable to assess them as being cooperative.

The reasons for this are as follows:

- We do not regard our requests for cost and domestic sales data to be overly burdensome for your client. You have informed us that one reason submitting this data would be problematic for your client is that data of this type was not prepared during the European Commission's investigations. Whilst familiarity with the preparation of such data may have assisted your client, we would expect such data to be readily available from management accounts and financial statements.
- No meaningful quantitative data or documentary evidence has been provided regarding the [Confidential information redacted] caused by the COVID-19 pandemic. Furthermore, your client has not demonstrated the extent to which [Confidential information redacted] have affected their ability to provide the

information requested. In these circumstances we are not satisfied that your client has acted in the best of their ability.

Your client is now being treated as non-cooperative. Accordingly, we will use facts available where necessary to overcome the absence of information required for a determination. These facts available may or may not include information already submitted by your client, as well as information from secondary sources.

The use of information and facts available from secondary sources is governed by regulation 47 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019.

Yours sincerely,

Alex Uden

Lead Investigator