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UK Department for International Trade
Trade Remedies Investigations Directorate

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RE: Request of information: Transition Review of the anti-dumping measures applicable to imports of certain welded pipes and tubes from Russia, Belarus and China

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Thank you for your feedback on our comments submitted on 17 November 2020. We very much appreciate that you note our arguments on the grounds for initiating the review.

We also want to pay your attention to section III of our comments. This information can be easily checked and shows that there are actually no grounds to impose the measure on Russian producers since the Russian product was not imported to the UK neither long before the original EU investigation period nor during the application of the measure.

As for your additional questions regarding the information provided by the Russian side in section V of the comments we kindly provide you the following answers:

A copy of the unaltered source data you used from Metal Expert for the consumption and production of tubes used in the construction sector data (tables 2 and 3), including an explanation of how the end use of the tubes was identified.

A copy of the source data we used from Metal Expert as well as its translation to English is enclosed ([Exhibit 1](#)¹).

¹ Both Exhibit 1 and Exhibit 2 are confidential.

A definition of the category “shaped tube” used in the production and consumption figures.

‘Shaped tube’ is also known as hollow sections. Its production process includes deformation of a round tube after welding in order to get square, rectangular, oval etc. tubes.

The diameter range of the “small and medium diameter” tubes reported in the production and consumptions figures.

10-165mm

An explanation of the production and consumption figures provided in this section. Are they actual production and consumption? If so, do you have any further figures that relate to capacity, in particular the presence or absence of unused capacity?

The production and consumption figures provided by Metal Expert are actual. We do not have any further figures that relate to capacity since official Russian statistics on steel tube product categories is not detailed enough.

The data and method used by Russian producers to estimate that the cost of delivery from Russia to the UK accounts for 30% of the Russian WTP price on the UK market. Please include a breakdown of the type of costs this estimate includes (such as insurance and taxes) and details of any quotes or market intelligence used.

Please see the data in [Exhibit 2](#).

The units for the data in table 4.

Units for the data provided in table 4 are thousands of tonnes.

An explanation of the categories used in table 4. Is the “CIS Countries” tab inclusive of the figures for Belarus and Kazakhstan and does the figure reported for “All Countries” include CIS countries?

Russian exports to “CIS Countries” includes export to Azerbaijan, Armenia, Belarus, Kazakhstan, Kyrgyz Republic, Moldova, Tajikistan, Turkmenistan, Uzbekistan and Ukraine. The figure reported for “All Countries” includes CIS countries.

Please contact us if you have any questions regarding this submission or require any additional information.

Kind regards,

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