

## Observations by Silvery Dragon Prestressed Materials Co. Ltd Tianjin and its subsidiaries (Silvery Dragon) on the Statement of Essential Facts by the Trade Remedies Investigations Directorate (TRID) of the Department for International Trade (DIT) in Transition review TD0003 – certain pre-and-post-stressing wire and strands (PSC Wire and Strands) originating in the People’s Republic of China (China)

### Introduction and Summary

1. This document is submitted by Silvery Dragon in response to the invitation from the TRID to comment on its Statement of Essential Facts of 1 April 2021 and its intention to recommend a preliminary determination that the current anti-dumping measures imposed on PSC wire and strands originating in China be revoked.
2. As an overseas exporter of the goods subject to review from China, Silvery Dragon wishes to support the realistic approach taken by the TRID and its intended preliminary decision following the transition review TD0003.
3. Silvery Dragon also welcomes the position taken by the UK Industry to withdraw their interest in maintaining the measures and thereby save the time and resources of the TRID and all other parties participating in the present transition review procedure.

### The Statement of Essential Facts and Recommendation

4. Silvery Dragon agrees with the interpretation, and application, of the relevant rules in the UK Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (D&S Regulations) by the TRID. It also believes that its conclusions and intended preliminary recommendation comply with those rules. In particular, it is acknowledged that the TRID :
  - considered specifically under Regulation 99A(1)(a) and (1)(b) of the D&S Regulations:
    - whether the application of the anti-dumping amount is necessary or sufficient to offset the dumping of the relevant goods in the UK market; and
    - whether injury to the UK industry in the relevant goods would occur if the anti-dumping amount were no longer applied to those goods.
  - considered, based on the UK industry’s withdrawal of interest in maintaining the measure, under 99A(1)(b), that injury would not occur to the UK industry if the measure was no longer applied.
  - considered under 99A(1)(a) that the measure is sufficient to offset the dumping, but that they did not have sufficient information or data that would allow them to draw a conclusion as to whether the measure is necessary to offset dumping.
  - May also consider under 99A(2) of the D&S Regulations:
    - whether it is appropriate to recalculate the anti-dumping amount;

- whether the goods or the description of the goods to which the anti-dumping amount applies should be varied;
  - whether to reassess the dumping margin;
  - and whether to reassess the anti-dumping amount adequate to remove the injury to the UK industry.
- did not consider it necessary to do any of the tests under 99A(2) because of the outcome of the tests under 99A(1).
5. It is on this basis, and following the analysis of the evidence available, TRID intends to recommend a preliminary decision following the transition review under Regulation 100(1) of the D&S Regulations to revoke the anti-dumping measure.

### Submissions by Silvery Dragon

6. It is clear that there have been no significant imports of the goods subject to review from China, during the Period of Investigation (the “POI”), nor during the period for the injury assessment.
7. The evidence provided by Silvery Dragon, in its Exporter Questionnaire Response, clearly demonstrates that it has no plans to increase the capacity in the future.
8. The withdrawal by the only UK producer is entirely consistent with the indications available that there is no risk of occurrence of injury to the UK Industry.
9. It is not necessary for the TRID to address the UK Economic Interest Test because the TRID intends to recommend a preliminary determination that the measures should be revoked.
10. In conclusion, Silvery Dragon supports TRID’s recommendation that the current anti-dumping measures imposed on PSC wire and strands originating in China be revoked.