

Beijing, China
April 8, 2021

Comments on the Statement of Essential Facts regarding Transition Review TD0003 on Certain Pre- and Post-stressing Wires and Wire Strands of Non-alloy Steel (PSC Wires and Strands) originating in the People's Republic of China

Dear Investigator,

We recall the Statement of Essential Facts (the "SEF") published on the Trade Remedy Service on April 1, 2021 concerning the executive summary and intended preliminary decision related to this transition review, in which TRID stated that it intended to recommend a preliminary decision to revoke the anti-dumping amount.

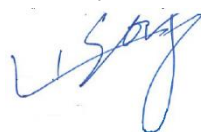
According to the SEF, TRID confirms the facts that the UK industry has withdrawn their interest in maintaining the measure and the information provided by the UK industry was not verifiable. As a consequence, there was no evidence, or any other information presented to prove the injury would occur if the anti-dumping amount was no longer applied.

Under 99A(1)(b) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the "D&S Regulations"), TRID must consider "whether injury to the UK industry in the relevant goods would occur if the anti-dumping amount or the countervailing amount were no longer applied to those goods". However, as aforementioned, the occurrence of injury is not supported by any evidence in this transition review.

Since 99C of the D&S Regulations stipulates that Part 4 may be applied to a transition review, the determination of injury should constitute the basis of TRID's decision to maintain or revoke the anti-dumping amount.

Following the above, since occurrence of injury is not proved by any evidence and the UK industry has withdrawn their interest in maintaining the measure, we consider there is no basis for the measure to apply. We appreciated TRID's intention to recommend revocation of the anti-dumping amount and respectfully request the anti-dumping amount to be finally revoked according to 100(1), 100(2) and 100B of the D&S Regulations.

Sincerely,



Lei Song
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