

**Comments in the UK Transition Anti-dumping Review No. TD0003
on PSC Wire and Strands from China**

Submitted on behalf of Silvery Dragon

19 February 2021

Silvery Dragon Prestressed Materials Co, Ltd Tianjin and its subsidiaries (hereinafter “Silvery Dragon”), are a group of Chinese exporting producers of PSC Wire and Strands, and are currently subject the anti-dumping measures in the EU following the Commission Implementing Regulation (EU) 2015/865 of 4 June 2015.

Subsequent to the initiation of the UK transition review TD0003, Silvery Dragon registered itself as an interested party and submitted a complete questionnaire response.

On 4 February 2021, a Note to the File was published by the UK Trade Remedies Services (TRS), informing interested parties that the UK industry has withdrawn its interest in maintaining the current measure in the UK. The Note also invited interested parties to submit comments on this issue.

The present document constitutes Silvery Dragon’s principal view on the withdrawal of the interest of the UK producer. Silvery Dragon reserves the right to present further evidence and arguments throughout any of the later stages of this proceeding.

The current transition review (TD0003) and the UK anti-dumping measures on PSC wire and strands from China should be terminated.

Provisions 64 (2) of *The Trade Remedies (Dumping and Subsidization) (EU Exit) Regulations 2019* (the “Dumping and Subsidization Regulations 2019”) provides that (in the context of an original investigation) the TRA may, where it considers it appropriate, terminate an investigation on the request of the applicant UK industry. This provision should apply *mutatis mutandis* to reviews.

In the current review proceeding, the UK producer already confirmed on 27 January 2021 that they no longer have interest in maintaining the measures in the UK. Following

the withdrawal of the interest of the UK producer, there will be no other party who could possibly be interested in the continuation of the measure in the UK. Therefore, termination of the transition review and the current anti-dumping measure will be in the overall interest of the UK.

A similar example can be found in *grain orientated flat-rolled products of electrical steel (GOES)* from China, Japan, Korea, Russia and the U.S.A (AD 608 in the EU). While the anti-dumping measure on GOES was initially maintained in the UK, it has recently been terminated by the TRS due to the fact that there is lack of production of this product in the UK.

Considering that the UK producer of PSC wires and strands has withdrawn its interest, and that the UK TRS applied a similar approach in the *GOES* case, Silvery Dragon believes that it is appropriate to terminate the current review proceeding and the existing measure in the UK. As mentioned above, such termination would also be in the overall economic interest of the UK.

Silvery Dragon wishes to reiterate its intention of full cooperation with the UK TRS throughout the review proceeding. Upon request, Silvery Dragon is willing to provide any additional comments and information to your Services.
