September 21, 2016

CHINA’S WTO COMPLIANCE
DOCKET NO. USTR-2016-0012

VIA ELECTRONIC SUBMISSION

Mr. Edward Gresser
Chair, Trade Policy Staff Committee
Office of the United States Trade Representative
600 Seventeenth Street, NW
Washington, DC 20508

Re:  Comments concerning China’s Compliance with
WTO Commitments (Docket Number USTR-2016-0012)

Dear Mr. Chairman:

The American Wire Producers Association (“AWPA”) appreciates the opportunity to submit these written comments in connection with the Trade Policy Staff Committee’s review of China’s compliance with the commitments it made during its accession to the World Trade Organization (“WTO”) in 2001.¹

The members of the AWPA remain firmly convinced that the United States Government must insist that China abide by its WTO commitments and immediately stop its illegal trade policies and practices on several fronts, including:

(1) Mercantilist export tax and value added tax (“VAT”) rebate schemes which restrict the exportation of basic products from China and promote the exportation of downstream value-added products by China;

(2) Widespread subsidization of Chinese production for export markets by every level of the Chinese governmental system;

(3) Actions of many Chinese manufacturers and exporters to evade applicable antidumping and countervailing duty orders through transshipment, misclassification, falsification of country of origin, and other illegal schemes; and

(4) Currency manipulation which protects and promotes China’s export-driven industries.

American manufacturers of wire and wire products have been seriously and adversely impacted by these WTO-inconsistent practices, making it extremely difficult and often impossible for the U.S. industry to compete with unfairly-traded imports from China.

In addition, we urge that the United States continue to treat China as a nonmarket economy (“NME”) country in the administration of our antidumping (“AD”) and countervailing duty (“CVD”) laws. China has failed to demonstrate that it has achieved market economy status pursuant to the statutory criteria applied by the U.S. Department of Commerce (“Commerce”).

I. BACKGROUND

The AWPA is a trade association which represents companies that collectively produce more than 80 percent of all carbon, alloy, and stainless steel wire and wire products manufactured in the United States. The 88 member companies of the AWPA employ 22,000 workers in over 215 plants and facilities located in 35 states. Sales of these companies exceeded $11 billion in 2015.

American manufacturers of steel wire and wire products are entrepreneurial and committed to maintaining their competitive market position despite heavy import pressure in
their product sectors. They pride themselves on their high productivity and constant reinvestment in the latest technology and equipment, keeping the American wire industry one of the most globally competitive segments of the steel industry. They are equally proud of the thousands of good-paying jobs that they provide to hard-working Americans in hundreds of communities throughout the United States.

The member companies of the AWPA firmly believe that the continued failure by the U.S. Government to halt China’s unfair trade practices—including the Chinese Government’s artificial suppression of the value of the Chinese renminbi, distortion of export patterns through manipulation of China’s export taxes and VAT rebate programs, subsidization of Chinese manufacturers, and evasion of applicable U.S. duties by Chinese exporters—threatens the jobs of thousands of American workers in the domestic wire and wire products industry.

II. **Major Trade Problems with China**

A. **Currency Manipulation**

The Chinese renminbi (“RMB”) or yuan remains significantly undervalued against the U.S. dollar and other major currencies. At the same time, Chinese industries have achieved major increases in production capability and quality, productivity, foreign direct investment, and other factors that would normally be expected to cause a currency to appreciate. China has repeatedly stated that it may be willing to consider restraining its manipulation of the RMB, but the Chinese Government has fallen woefully short of adequately realigning its currency in accordance with free market principles. Our country cannot continue to accept half measures
and token gestures when the U.S. manufacturing sector is suffering so severely as a direct result of the Chinese Government’s deliberate and willful manipulation of its currency.

Under current U.S. law, the Department of the Treasury (“Treasury”) is required to identify countries that manipulate their currencies for purposes of gaining an unfair competitive trade advantage.\(^2\) Treasury has found that certain countries’ currencies are undervalued, but despite overwhelming evidence, Treasury has refused to cite such countries—including China—as currency manipulators.\(^3\) Treasury’s April 2016 report noted that, although China intervened in foreign exchange markets in 2015 and 2016 to support the value of the RMB, “\{m\}ore clarity over exchange rate goals, and \{commitment\} that devaluation will not be used to support growth, would help stabilize the market.”\(^4\)

We respectfully urge the United States Government to identify China as a currency manipulator and initiate the remedial actions provided by law.


\(^4\) U.S. Department of the Treasury, Office of International Affairs: Report to Congress on Foreign Exchange Policies of Major Trading Partners of the United States (April 29, 2016) at 15–17 and 29. Treasury also noted that a policy shift by Chinese authorities resulted in a three-percent depreciation of the RMB against the dollar over a two-day period in August 2015. Id. at 16.
B. BORDER TAX SCHEMES—EXPORT TAXES AND VAT REBATE INCENTIVES

AWPA members and many other American manufacturers must contend with an extraordinary distortion of trade patterns caused by the border tax regime manipulated by the Chinese Government. In violation of its international trade obligations, China has imposed export taxes on carbon steel wire rod while granting VAT rebates on many finished downstream wire products manufactured from wire rod, creating distortions that directly and adversely impact U.S. manufacturers of these downstream products.

The Chinese Government’s use of export taxes and licenses to limit exports of wire rod is a violation of China’s Protocol of Accession to the WTO. At the same time, China’s VAT rebates subsidize the exportation of downstream wire products and severely distort the trade in these products. The imposition of export taxes on wire rod encourages the retention of this basic material input in China, resulting in greater availability and lower input costs for Chinese manufacturers of wire and wire products. Together, these tax and rebate practices favor Chinese industries which export higher value downstream products to the United States and other countries. These clear manipulations of China’s border tax schemes violate the commitments made by the Chinese Government when it joined the WTO.
The specific violations of China’s international obligations are as follows:

1. China’s export taxes on wire rod violate Section 11.3 of China’s Protocol of Accession to the WTO;\(^5\)

2. China’s export licensing requirements on wire rod violate Article XI:1 of the General Agreement on Tariffs and Trade (“GATT”) and Part I, Section 7.2 of China’s Protocol of Accession to the WTO;

3. China’s differential tax scheme is a prohibited export subsidy that violates Article 3 of the Subsidies and Countervailing Measures Agreement, Articles VI and XVI of the GATT, and Part I, Section 10.3 of China’s Protocol of Accession to the WTO;

4. China’s discriminatory, steel-specific border measures are having adverse effects on the interests of the United States and as such also constitute an actionable subsidy under Articles 5 and 6.3 of the Agreement on Subsidies and Countervailing Measures; and

5. China’s differential export tax scheme, export taxes on wire rod, and export licensing requirements for wire rod further nullify or impair benefits of the United States within the meaning of Article XXIII:1(b) of the GATT.

The member companies of the AWPA have worked with U.S. officials to try to address the problems resulting from China’s noncompliance with its obligations under the WTO, starting with participation in the U.S.-China Steel Dialogue which was held in Beijing, China, in October 2008. The Office of the United States Trade Representative (“USTR”) agreed that

\(^5\) World Trade Organization: Accession of the People’s Republic of China, WT/L/432 (November 23, 2001)—“China shall eliminate all taxes and charges applied to exports unless specifically provided for in Annex 6 of this Protocol or applied in conformity with the provisions of Article VIII of the GATT 1994.” Steel wire rod is not listed in Annex 6 as a product subject to export duties.
our industry had a unique story to tell and encouraged the AWPA to become an active participant in this government-industry initiative.

During the October 2008 meeting in Beijing, the Chinese Government acknowledged that a distortion did exist but claimed that it had the right to limit exports of wire rod due to an allegedly adverse impact of increased wire rod production on China’s environment. USTR officials countered that this argument is not plausible because domestic rod production within China was not being reduced as a result of the limits on wire rod exports. Following the Beijing meeting, there was some optimism by both U.S. officials and the AWPA’s representative that the Chinese Government would modify its export tax scheme. However, when the Chinese Government did announce the removal of export taxes on many steel products following the meeting, it did not remove or reduce the export tax on wire rod. Moreover, in 2009, the Chinese Government actually raised the amount of VAT rebates on a number of downstream wire and wire products, including galvanized wire, silicon-manganese wire, and other alloy steel wire—further encouraging the export of these wire products.

It is the AWPA’s position that the Chinese Government’s disparate treatment of wire rod in relation to other steel products undermines any potential legal defense based on environmental concerns. If the Chinese authorities were motivated by such concerns, why did they remove the export taxes on other steel products which present the same environmental concerns and, in fact, are likely to have an even greater adverse impact on the environment than the production of wire rod? Moreover, wire rod continues to be produced in China—it just remains in China,
rather than being available for export. It appears that China’s actions are driven not by concerns about the environment but by a commercial calculation to promote the production and exportation of downstream wire and wire products manufactured from wire rod. These downstream products have higher added values than wire rod, and the Chinese companies that make these downstream products employ large numbers of workers.

The USTR raised these issues in its 2009 Report to Congress on China’s WTO Compliance, stating that “China maintains numerous export restraints that raise serious concerns under WTO rules,” noting that export restraints by the Chinese Government create disadvantages for competing industries in the United States and other countries and that these “widespread” export restraints “can significantly distort trade.” Further, the 2009 Report observed that “China’s economic planners also attempt to manage the export of many intermediate and downstream products, often by raising or lowering the value-added tax (“VAT”) rebate available upon export and sometimes by imposing or retracting export duties.” Following the 2008 Steel Dialogue meeting, mentioned above, the USTR reported that, in December 2008, China responded to the global economic downturn “by seeking to boost its exports through

---


7 Id. at 39.
changes to its VAT export rebate and export duty regimes”—which were intended again to increase exports of downstream steel products.8

The USTR returned to these issues in its 2011 Report to Congress on China’s WTO Compliance, reiterating that:

As in prior years, China maintains numerous export restraints that appear to violate WTO rules, including specific commitments that China made in its Protocol of Accession. These export restraints distort trade in raw materials as well as intermediate and downstream products.9

As the 2011 Report explained:

Typically, the objective of China’s border tax adjustments is to make larger quantities of primary and intermediate products in a particular sector available domestically at lower prices than the rest of the world, giving China’s downstream producers of finished products using these inputs a competitive advantage over foreign producers. To accomplish this objective, China discourages the export of the relevant primary and intermediate products by reducing or eliminating VAT rebates and perhaps also imposing export duties on them, resulting in increased domestic supply and lower domestic prices. China’s downstream producers, in turn, benefit from these lower input prices as well as full VAT rebates on export of their finished products.10

8 Id. at 40.


10 Id. at 39. This is precisely what the Chinese Government has done with respect to steel wire rod, the primary raw material for the production of wire and wire products.
In particular, the 2011 Report addressed the effect of these export restraint schemes on steel wire products:

In some situations, China has also used its border taxes to encourage the export of certain finished products over other finished products within a sector. For example, China reduced or eliminated VAT export rebates in November 2006 and April 2007 and imposed export duties in May and July 2007 and January 2008 on a wide range of semi-finished and finished steel products, seeking to discourage further unneeded creation of production capacity for these products. At the same time, these changes did not target all steel products, and the result was that Chinese steel producers shifted their production to value-added steel products for which full or partial VAT export rebates were still available, particularly wire products and steel pipe and tube products, causing a surge in exports of these products, many of which ended up in the U.S. market.\footnote{\textit{Id. (emphasis supplied).}}

The USTR’s subsequent reports in 2012, 2013, and 2014 reiterated these concerns in almost exactly the same language.\footnote{United States Trade Representative, 2012 \textit{Report to Congress On China’s WTO Compliance} (December 2012) (‘‘2012 Report’’) at 43–44; United States Trade Representative, 2013 \textit{Report to Congress On China’s WTO Compliance} (December 2013) (‘‘2013 Report’’) at 42–43; United States Trade Representative, 2014 \textit{Report to Congress On China’s WTO Compliance} (December 2014) (‘‘2014 Report’’) at 11–12 and 53–54.} Each of these reports noted that such export restraints significantly distort trade by artificially increasing China’s export prices for these inputs but at the same time artificially lowering China’s domestic prices for these inputs, enabling Chinese producers of downstream products to produce lower-priced merchandise for competition in global markets. Thus, Chinese manufacturers of steel wire and wire products benefit from
the artificial restraints on exports of wire rod—the basic input for wire and wire products—to the detriment of the companies and workers in the U.S. wire and wire products industry.

Unfortunately, there appears to have been little progress in eliminating this widespread abuse on the part of the Chinese Government, and American companies and their workers have paid the price for the failure to end these trade-distorting practices. As the 2015 Report recognized:

In some situations, China has also used its border taxes to encourage the export of certain finished products over other finished products within a particular sector. For example, in the past, China has targeted value-added steel products, particularly wire products and steel pipe and tube products, causing a surge in exports of these products, many of which ended up in the U.S. market.13

Echoing its predecessors, the 2015 Report noted:

As in prior years, in 2015, the Chinese government attempted to manage the export of many primary, intermediate and downstream products by raising or lowering the value-added tax rebate available upon export. China sometimes reinforces its objectives by imposing or retracting export duties. These practices have caused tremendous disruption, uncertainty and unfairness in the global markets for some products, particularly downstream products where China is a leading world producer or exporter, such as products made by the steel, aluminum and soda ash industries. These practices, together with other policies, such as excessive government subsidization, also have contributed to severe excess capacity in these same industries.14

---


14 Id. at 13.
Although China purportedly agreed to improve its value-added tax rebate system, the 2015 Report found that, to date: “China has not made any movement toward the adoption of international best practices.”\textsuperscript{15}

The 2015 Report once again noted that the Chinese Government’s objective in manipulating its border tax regime is “to make larger quantities of primary and intermediate products . . . available domestically at lower prices than the rest of the world,” resulting in a competitive advantage for China’s downstream producers of finished products.\textsuperscript{16} The Chinese Government discourages exports of primary and intermediate products by reducing or eliminating VAT rebates and also in some cases by imposing export duties, and at the same time it extends full VAT refunds on exports of the finished products.\textsuperscript{17} This manipulation of border taxes leads to increased domestic supplies of these primary and intermediate inputs at lower prices for Chinese downstream manufacturers that further benefit from VAT rebates when they export.\textsuperscript{18} Thus, as the 2015 Report concluded:

\begin{quote}
China has . . . used its border taxes to encourage the export of certain finished products over other finished products within a particular sector. For example, in the past, China has targeted value-added steel products, \textit{particularly wire products} and steel
\end{quote}

\begin{itemize}
\item \textsuperscript{15} \textit{Id.}
\item \textsuperscript{16} \textit{Id.} at 55.
\item \textsuperscript{17} \textit{Id.}
\item \textsuperscript{18} \textit{Id.}
\end{itemize}
pipe and tube products, causing a surge in exports of these products, many of which ended up in the U.S. market.\textsuperscript{19}

Despite repeated complaints from the United States and other WTO members about the trade-distortive effects of its border tax practices, “China has been unwilling to commit to abandon its trade-distortive export rebates.”\textsuperscript{20} Although China has apparently acknowledged that its eventual goal is to conform its VAT rebate system to WTO norms, it has not yet done so. We respectfully urge the United States Government to continue to press the Chinese Government to abide by its international agreements and achieve this objective.

C. CHINESE GOVERNMENT’S POLICY OF SUBSIDIZATION

The Chinese Government’s continued intervention in its domestic manufacturing sector in ways that promote the creation of excess capacity to produce wire and wire products is of great concern to the AWPA. China’s productive capacity far exceeds its domestic demand for these products. Thus, Chinese manufacturers have a strong incentive to export wire products to the United States at prices far below the market-determined prices of American companies.

In particular, Chinese government bodies at every level—central, provincial, municipal, and local—provide a broad range of subsidies that distort national and international markets and promote the building of excess capacity in the steel sector, including steel wire and

\textsuperscript{19} Id. at 56 (emphasis supplied). See also Exhibit 1.

\textsuperscript{20} 2015 Report at 56.
wire products.\textsuperscript{21} Despite China’s commitment to eliminate all prohibited subsidies by the time of its accession to the WTO, fifteen years later China continues to extend prohibited subsidies to its local industries.\textsuperscript{22} These and other subsidy programs have been subject to numerous countervailing duty investigations by the United States on steel, chemicals, textiles, paper, tires, and other products.\textsuperscript{23}

In several recent countervailing duty investigations involving steel wire and wire products, the U.S. Department of Commerce (“Commerce”) has made final determinations that the Chinese Government has bestowed subsidies on local industries which then exported merchandise to the United States at unfair prices. Specifically, Commerce found countervailing duty margins ranging from 7.85 percent to 264.09 percent on wire shelving for kitchen appliances; countervailing duty margins ranging from 9.42 percent to 45.85 percent on prestressed concrete steel wire strand; and a countervailing duty margin of 62.46 percent on steel wire grating.\textsuperscript{24}

\textsuperscript{21} See id. at 60–64 and 101–104.

\textsuperscript{22} Id. at 60 and 62–63.

\textsuperscript{23} Id. at 63.

\textsuperscript{24} See id. at 63–64. Commerce also found countervailing duty margins ranging from 1.52 percent to 437.11 percent on steel wire decking and from 19.06 percent to 223.27 percent on galvanized steel wire, although the U.S. International Trade Commission made negative injury determinations in those investigations.
The U.S. wire and wire products industry can compete with any manufacturer whose practices are governed by free market principles. We cannot compete, however, with the pervasive and substantial subsidies given by various levels of the Chinese Government to force otherwise noncompetitive products into the U.S. market.

**D. WIDESPREAD SCHEMES TO EVADE APPLICABLE ANTIDUMPING AND COUNTERVAILING DUTIES**

Many export-oriented companies in China have engaged—and continue to engage—in a variety of schemes to evade the collection of applicable antidumping (“AD”) and countervailing (“CVD”) duties by U.S. Customs and Border Protection (“CBP”). These schemes include:

1. **Transshipment of Goods through Third Countries.** Chinese-origin goods subject to AD and/or CVD orders are shipped to a third country which is not subject to such orders. Sales and import documents are falsified to indicate that the third country is the source of the goods, and the goods subsequently enter the United States without the payment of applicable AD and/or CVD duties.

2. **Falsification of the Country of Origin without Transshipment.** This brazen scheme is similar to transshipment except that the goods are shipped directly from China to the United States. Sales and import documents falsely indicate origination in a third country in order to avoid the assessment of applicable AD and/or CVD duties.

3. **Misclassification of Goods Subject to AD and CVD Orders.** The tariff codes and/or descriptions of the goods are falsified to indicate merchandise which is not subject to AD or CVD orders. Again, the goods enter the United States without the payment of applicable AD and/or CVD duties.

4. **Undervaluation of Goods Subject to AD and CVD Orders.** This scheme unlawfully reduces an importer’s liability because AD and CVD duties are
calculated on the reported value of the goods generally on an *ad valorem* (percentage) basis.

(5) **Attribution of Goods to Companies with a Low or No AD/CVD Rate.**

This scheme involves either shipping goods through a Chinese company with an AD/CVD rate which is lower than the Chinese producer’s rate or simply falsifying the documents to reflect the name of a Chinese company with a lower or no AD/CVD rate. In either case, the United States is defrauded of the applicable duties.

U.S. manufacturers have submitted information about such evasion schemes to CBP through the e-Allegation program, as well as in meetings with officials at CBP Headquarters in Washington and CBP’s Center of Excellence and Expertise for Base Metals in Chicago, and in visits with CBP inspectors at the ports.25 For example, the domestic industry which manufactures steel wire garment hangers has submitted 30 e-Allegations to CBP with documentary support, showing transshipment of hangers from China via third countries and misclassification of Chinese hangers as nonsubject merchandise in order to evade the assessment of applicable AD duties.26 In another case, the largest American producer of uncovered innerspring units used in the manufacture of mattresses filed and won

---

25. The enactment of the *Enforce and Protect Act* in 2016 establishes an enhanced procedure for CBP to investigate allegations of AD and CVD evasion, and CBP issued its *Interim Final Regulations* on August 22, 2016. The AWPA expects that this new procedure will result in more effective enforcement of AD and CVD orders on steel wire and wire products.

26. In a 2013 report to Congress, CBP noted that “*p*ort operations targeting wire hangers from China led to the discovery of misclassifications and transshipments of this merchandise at several ports of entry, and a loss of revenue of more than $2 million.” U.S. Customs and Border Protection, *Fiscal Year 2013 Report to Congress, Antidumping and Countervailing Duty Enforcement Actions and Compliance Initiatives: FY 2012* (July 19, 2013) at 5. See also Exhibit 2, which includes several *AD/CVD Update* reports from CBP that identify numerous violations of AD and CVD orders with regard to steel wire garment hangers and nails.
an AD case against China but was deprived of effective relief when imports of Chinese-origin innerspring units were transshipped through Hong Kong to the United States. A report prepared by a private investigator confirmed that there was no evidence of any production of these units in Hong Kong. In addition, during the course of its administrative reviews of AD and CVD orders on products from China, the U.S. Department of Commerce often finds evidence of apparent violations of the trade laws, and it routinely furnishes this information to CBP for further investigation and enforcement action.\textsuperscript{27}

The pervasiveness of these evasion schemes was illustrated by a report prepared in late 2010 by the staff of Senator Ron Wyden (D-OR), who was at that time Chairman of the Trade Subcommittee of the Senate Finance Committee.\textsuperscript{28} The Senator’s staff created a fictitious

\textsuperscript{27} Memorandum to James C. Doyle, Director, Office V, Antidumping and Countervailing Duty Operations, U.S. Department of Commerce, from Julia Hancock, Senior Case Analyst, Office V, Antidumping and Countervailing Duty Operations, U.S. Department of Commerce, regarding Fifth Administrative Review of Certain Steel Threaded Rod from the People’s Republic of China: Respondent Selection (July 10, 2014) at 5 (“To address the misclassification concern raised by Petitioner, . . . the Department will provide to CBP any relevant information, as appropriate, to assist that agency in fulfilling its statutory mission relating to AD/CVD administration and enforcement.”). See also Certain Steel Threaded Rod From the People's Republic of China: Preliminary Results of the First Administrative Review and Preliminary Recission, in Part, 76 Fed. Reg. 26,696 (May 9, 2011) at 26,697 (“The Department referred this matter to CBP for possible further investigation and enforcement action”); Steel Wire Garment Hangers From the People’s Republic of China: Preliminary Results and Preliminary Recission, in Part, of the Second Antidumping Duty Administrative Review, 76 Fed. Reg. 66,903 (October 28, 2011) at 66,905 (“We intend to refer this matter to CBP to investigate whether Jiaxing Xinyue’s entries were entered properly.”); Certain Steel Threaded Rod From the People’s Republic of China: Preliminary Results of Antidumping Duty Administrative Review; 2011-2212, 78 Fed. Reg. 21,101 (April 9, 2013) at 21,102 (“We intend to refer this matter to CBP to investigate whether Jiaxing Xinyue’s entries were entered improperly”).

\textsuperscript{28} Senator Wyden is currently Ranking Member of the Finance Committee.
company and set up a company profile on a Chinese business-to-business website “in order to find companies willing to cheat and evade AD/CVD orders.”

The results were dismaying. In less than two weeks, staff obtained written confirmation from ten Chinese companies that they were willing to engage or assist in illegal evasion schemes in order to avoid the payment of applicable AD and/or CVD duties. These schemes included transshipment of the subject merchandise through third countries and falsification of the country of origin, undervaluation of the merchandise to reduce the amount of AD or CVD duties, minor assembly operations in a third country, and shipping subject merchandise under the name of a Chinese company which had a lower AD or CVD rate.

While the Chinese Government may not be complicit in the execution of these evasion schemes, it does have the means to curtail, if not entirely eliminate, their operation. For example, export documentation submitted to the Chinese Government which shows a country of origin other than China is clear evidence of fraudulent activity, and surging Chinese exports of large quantities of merchandise destined for relatively small markets such as Malaysia or Vietnam are indications that the merchandise is a likely candidate for transshipment. Other irregularities or abnormalities with respect to Chinese exports—particularly of products subject to AD or CVD orders in the United States—raise the prospect


30 Id.
that evasion schemes are at work. Just as the Chinese Government has apparently taken steps to curtail the exportation of counterfeit or otherwise illegal goods to other markets, Chinese authorities can monitor exports to insure that they are in compliance with international trade norms.

E. THE REALITY AND CONTINUATION OF CHINA’S DISTORTIVE TRADE PRACTICES

The cumulative effect of the Chinese Government’s schemes to promote exports of downstream, value-added products—such as steel wire and wire products—while restraining the export of inputs—such as steel wire rod—can be seen in the import statistics of the United States. As Exhibit 1 shows, U.S. imports of wire and wire products from China have surged since China became a member of the WTO in 2001. While the impact of the great recession resulted in a general decline of imports in 2009, the Chinese export machine returned with a vengeance in 2010, and shipments of wire products again reached high levels in 2012, 2013, 2014, and 2015.\(^{31}\) During much of the same time, imports of steel wire rod—the basic input for

\(^{31}\) Certain wire products, such as wire strand, nails, and steel wire garment hangers, did not follow this general trend because the U.S. industries producing these products pursued successful trade actions against Chinese imports under our antidumping and countervailing duty laws. The resulting orders on strand, nails, and hangers had a dampening effect on imports from China—at least temporarily.
wire and wire products—plummeted, largely as the result of the implementation of China’s discriminatory border tax schemes.\textsuperscript{32}

In some instances, the wire products that have flooded into the United States from China are not even consumed in the Chinese home market. For example, although China became the world’s largest producer of steel wire garment hangers, China has virtually no domestic market for garment hangers. Instead, with its vast capacity and predatory pricing schemes, China targeted the U.S. market, and imports of steel wire garment hangers from China nearly destroyed a once-vibrant and competitive American industry, driving seven companies out of business and forcing unemployment on hundreds of American families. When the U.S. hanger industry turned to the U.S. trade laws to redress the imbalance, the effectiveness of

\textsuperscript{32} It should be noted that wire rod imports from China fell dramatically beginning in 2007 despite the fact that the U.S. industry’s antidumping case against wire rod from China failed in early 2006. One would normally expect that, under these circumstances, imports of wire rod from China would continue at historic levels or even increase. However, in 2007—the year following the termination of the antidumping case—imports of Chinese wire rod fell by 56.5 percent. By 2008, imports amounted to 11.8 percent of 2006 levels and fell further to six-tenths of one percent of 2006 levels in 2009. Imports of Chinese wire rod were virtually nonexistent in 2010 and 2011, and imports in 2012 and 2013 remained far below 2008 levels. \textit{See} Exhibit 1. An unintended consequence of the Chinese Government’s manipulation of its border tax regime was the substantial increase of alloy steel wire rod exports from China to the United States in 2012 and 2013. The vast majority of this alloy product was essentially carbon steel wire rod with the addition of trace amounts of boron in order to qualify as an alloy product, eligible for preferential treatment under China’s border tax regime. However, the increasing level of these exports resulted in the U.S. wire rod industry’s filing antidumping and countervailing duty petitions on Chinese carbon and alloy wire rod in January 2014, which resulted in the imposition of antidumping and countervailing duty orders in January 2015. \textit{Carbon and Certain Alloy Steel Wire Rod From the People’s Republic of China: Antidumping Duty Order,} 80 Fed. Reg. 1,015 (January 8, 2015); \textit{Carbon and Certain Alloy Steel Wire Rod From the People’s Republic of China: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order,} 80 Fed. Reg. 1,018 (January 8, 2015).
the antidumping remedy was—and continues to be—undermined by the pervasive falsification of commercial and customs documents, transshipment of Chinese-made hangers through third countries, and other forms of circumvention and duty evasion.

III. RECOMMENDED ACTIONS

A. TRADE STRATEGY

The AWPA respectfully urges the United States to develop a national economic and trade strategy to address effectively and comprehensively the challenges posed by these unfair trade practices of the Chinese Government.

B. CONSTRUCTIVE DIALOGUE WITH ACTION

The AWPA respectfully urges the United States to continue to engage China in constructive dialogue, but at the same time we must use all available means to ensure the effective enforcement of international trade obligations—including China’s Accession Agreement to the WTO and all other WTO trade rules. Many of these recommendations are supported by the U.S.-China Economic and Security Review Commission in its 2011, 2012, 2013, 2014 and 2015 Annual Reports to Congress.33

---

C. **Remedies at the WTO**

The United States should continue aggressively to pursue the enforcement of its rights at the WTO regarding China’s unfair trade practices, including China’s border tax schemes.

D. **Effective Enforcement of Trade Remedies at the Border**

To date, it appears that U.S. Customs and Border Protection (“CBP”) and its sister agency, Immigration and Customs Enforcement (“ICE”), have been overwhelmed by the sheer magnitude of the transshipment and circumvention schemes which have often characterized the response of Chinese exporters and their complicit U.S. importers to the imposition of antidumping and countervailing duty orders. We respectfully urge the USTR, CBP, and ICE to press their counterparts in the Chinese Government for greater cooperation in stopping these illegal activities.

The United States also can take unilateral action consistent with the WTO to deal with the illicit duty evasion schemes of certain Chinese producers and exporters. First, passage of the *Enforce and Protect Act* (“EAPA”)—part of the *Enforcing Orders and Reducing Customs Evasion (ENFORCE) Act*—would enhance the ability of CBP to investigate and take enforcement action against imports which avoid the payment of the applicable AD and CVD duties. By establishing transparency, accountability, and deadlines in CBP’s duty evasion investigations, EAPA will encourage both U.S. manufacturers and U.S. importers to provide information and to cooperate in CBP’s proceedings. Second, the President should direct the U.S. Department of Commerce to exercise its authority to investigate evidence of
transshipment during its administrative reviews and scope inquiries of AD and CVD orders on products from China. The Department of Commerce has the expertise, experience, and authority to conduct on-site audits of foreign producers and exporters in order to verify information regarding the actual country of origin of the merchandise.

E. CONTINUED TREATMENT OF CHINA AS A NONMARKET ECONOMY COUNTRY UNDER U.S. ANTIDUMPING LAW

China’s accession agreement does not automatically confer market economy status (“MES”) on China after the fifteenth anniversary of the agreement in December 2015. Rather, the United States has—and must exercise—the authority to evaluate China’s eligibility for MES, and the AWPA submits that China has not demonstrated that it has met the standards for treatment as a market economy under the U.S. antidumping law.

In a broad sense, the definition of a market economy means that prices for goods are determined through free competition and profit-motivated investment decisions; that production and distribution of goods are determined by supply and demand; and that commercial decisions are made by private businesses and not by governmental authorities. This market economy model is in direct contrast to an economy where the government shapes and ultimately controls costs, prices, wages, investments, and currency values.
U.S. law requires that Commerce consider six criteria in determining whether a nation is a market economy. They are:

(i) The extent to which the currency of the foreign country is convertible into the currency of other countries;

(ii) The extent to which wage rates in the foreign country are determined by free bargaining between labor and management;

(iii) The extent to which joint ventures or other investments by firms of other foreign countries are permitted in the foreign country;

(iv) The extent of government ownership or control of the means of production;

(v) The extent of government control over the allocation of resources and over the price and output decisions of enterprises; and

(vi) Such other factors as the administering authority considers appropriate.

Based on current information available on the Chinese economy, including the 2015 Report as well as determinations by Commerce in recent antidumping and countervailing duty investigations involving products from China, it is clear that China has not achieved MES and should continue to be treated as a nonmarket economy (“NME”) country.

* * *

The AWPA member companies have been losing ground in competition with Chinese producers who have flooded the U.S. market with unprecedented volumes of wire and wire products, and we expect further losses as long as the Chinese Government continues...
manipulating its border tax regime, turning a blind eye to transshipment and other illegal schemes of duty evasion, subsidizing its export-oriented industries, and manipulating its currency. China must be held accountable and be required to comply with its obligations under the WTO.

We look forward to continuing to work with the Administration as it takes effective steps to ensure that China fulfills its international commitments.

Sincerely,

Milton M. Magnus, III
AWPA President
President, M&B Metal Products Co., Inc.

Attachments
EXHIBIT 1

U.S. IMPORTS
OF
STEEL WIRE, WIRE PRODUCTS,
AND WIRE ROD FROM CHINA

CALENDAR YEARS 2001–2015

BEFORE THE TRADE POLICY STAFF COMMITTEE
OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

AMERICAN WIRE PRODUCERS ASSOCIATION

COMMENTS CONCERNING CHINA'S COMPLIANCE WITH WTO COMMITMENTS
(DOCKET NUMBER USTR-2016-0012)

SEPTEMBER 21, 2016
## U.S. Imports of Steel Wire and Wire Products from China
### Calendar Years 2001–2015

Quantities in net tons for all products except garment hangers
Quantities of garment hangers in units

<table>
<thead>
<tr>
<th>YEAR</th>
<th>DRAWN WIRE</th>
<th>WIRE ROPE</th>
<th>WIRE STRAND*</th>
<th>WIRE SPRINGS</th>
<th>WOVEN WIRE FABRIC</th>
<th>WIRE GRILL, NETTING AND FENCING</th>
<th>NAILS AND STAPLES*</th>
<th>INDUSTRIAL FASTENERS</th>
<th>CHAINS AND PARTS</th>
<th>STEEL WIRE GARMENT HANGERS*</th>
<th>CARBON STEEL WIRE ROD*</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001</td>
<td>37,218</td>
<td>10,482</td>
<td>2,169</td>
<td>11,716</td>
<td>4,517</td>
<td>47,601</td>
<td>123,645</td>
<td>174,180</td>
<td>37,062</td>
<td>0</td>
<td>22,961</td>
</tr>
<tr>
<td>2002</td>
<td>56,263</td>
<td>14,189</td>
<td>3,345</td>
<td>16,632</td>
<td>6,709</td>
<td>65,939</td>
<td>182,027</td>
<td>244,721</td>
<td>42,652</td>
<td>294,062,708</td>
<td>410,930</td>
</tr>
<tr>
<td>2003</td>
<td>61,233</td>
<td>19,124</td>
<td>22,642</td>
<td>18,039</td>
<td>8,010</td>
<td>70,191</td>
<td>265,603</td>
<td>259,976</td>
<td>47,940</td>
<td>487,748,019</td>
<td>262,330</td>
</tr>
<tr>
<td>2004</td>
<td>98,784</td>
<td>21,619</td>
<td>80,832</td>
<td>22,218</td>
<td>11,387</td>
<td>94,153</td>
<td>393,581</td>
<td>353,982</td>
<td>64,036</td>
<td>773,683,893</td>
<td>770,699</td>
</tr>
<tr>
<td>2005</td>
<td>129,238</td>
<td>26,472</td>
<td>105,763</td>
<td>36,338</td>
<td>6,504</td>
<td>59,214</td>
<td>558,387</td>
<td>443,882</td>
<td>73,959</td>
<td>1,044,700,856</td>
<td>684,739</td>
</tr>
<tr>
<td>2006</td>
<td>184,514</td>
<td>32,198</td>
<td>233,090</td>
<td>36,817</td>
<td>72,929</td>
<td>68,980</td>
<td>700,923</td>
<td>568,825</td>
<td>81,847</td>
<td>1,777,679,847</td>
<td>1,352,493</td>
</tr>
<tr>
<td>2007</td>
<td>157,760</td>
<td>34,717</td>
<td>229,442</td>
<td>32,073</td>
<td>81,421</td>
<td>68,750</td>
<td>636,882</td>
<td>542,377</td>
<td>89,421</td>
<td>2,697,369,183</td>
<td>588,110</td>
</tr>
<tr>
<td>2008</td>
<td>121,148</td>
<td>40,156</td>
<td>255,651</td>
<td>24,899</td>
<td>86,008</td>
<td>63,904</td>
<td>362,286</td>
<td>511,217</td>
<td>90,762</td>
<td>2,069,184,583</td>
<td>159,025</td>
</tr>
<tr>
<td>2009</td>
<td>79,287</td>
<td>30,580</td>
<td>69,303</td>
<td>10,733</td>
<td>56,709</td>
<td>47,866</td>
<td>212,630</td>
<td>298,025</td>
<td>66,413</td>
<td>733,870,626</td>
<td>8,408</td>
</tr>
<tr>
<td>2010</td>
<td>90,252</td>
<td>44,131</td>
<td>79,156</td>
<td>22,766</td>
<td>205,816</td>
<td>59,142</td>
<td>251,509</td>
<td>365,099</td>
<td>84,541</td>
<td>220,000,704</td>
<td>11,431</td>
</tr>
<tr>
<td>2011</td>
<td>80,047</td>
<td>43,957</td>
<td>86,578</td>
<td>21,704</td>
<td>218,462</td>
<td>61,705</td>
<td>247,811</td>
<td>398,184</td>
<td>99,569</td>
<td>588,917,073</td>
<td>253</td>
</tr>
<tr>
<td>2012</td>
<td>83,297</td>
<td>37,989</td>
<td>71,827</td>
<td>29,166</td>
<td>232,219</td>
<td>76,245</td>
<td>268,593</td>
<td>429,774</td>
<td>96,995</td>
<td>941,677,567</td>
<td>65,859</td>
</tr>
<tr>
<td>2013</td>
<td>98,315</td>
<td>34,661</td>
<td>51,312</td>
<td>30,164</td>
<td>239,784</td>
<td>66,211</td>
<td>244,435</td>
<td>418,470</td>
<td>86,808</td>
<td>1,119,899,939</td>
<td>37,364</td>
</tr>
<tr>
<td>2014</td>
<td>125,570</td>
<td>43,917</td>
<td>48,208</td>
<td>38,664</td>
<td>249,037</td>
<td>69,601</td>
<td>268,083</td>
<td>492,742</td>
<td>100,413</td>
<td>637,425,571</td>
<td>59,540</td>
</tr>
<tr>
<td>2015</td>
<td>174,136</td>
<td>40,068</td>
<td>50,019</td>
<td>41,374</td>
<td>234,475</td>
<td>82,853</td>
<td>307,670</td>
<td>498,470</td>
<td>102,713</td>
<td>95,508,275</td>
<td>87</td>
</tr>
</tbody>
</table>

*Antidumping ("AD") and/or countervailing duty ("CVD") petitions filed against imports from China, resulting in AD and/or CVD orders.

Exhibit 2

U.S. Customs and Border Protection

AD/CVD Enforcement Updates

(December 2014, June 2015, December 2015, and March 2016)

Before the Trade Policy Staff Committee
Office of the United States Trade Representative

American Wire Producers Association

Comments concerning China's Compliance with WTO Commitments
(Docket Number USTR-2016-0012)

September 21, 2016
AD/CVD Enforcement Updates

Selected Fiscal Year 2014 Highlights

- CBP collected $508.5 million in AD/CVD cash deposits, a 12 percent increase from FY 2013.

- CBP conducted 78 audits of importers of AD/CVD commodities with AD/CVD discrepancies of $24.6 million. CBP collected $8.5 million. Commodities involved in the audits include aluminum extrusions, bearings, candles, nails, lock washers, pencils, plastic bags, ribbons, shrimp, solar cells, steel pipe, tires, tissue paper, wooden bedroom furniture, and wood flooring.

- CBP’s AD/CVD targeting efforts led by the AD/CVD National Targeting and Analysis Group (NTAG) in Miami, Florida are achieving impressive results. AD/CVD NTAG targeting of imports of stainless steel sinks from China led to $3.5 million in evaded AD and CVD identified in CBP entry summary reviews.

Industry Highlights

- Frozen shrimp price increases: Certain types of frozen shrimp from several countries are subject to antidumping duties. According to the Southern Shrimp Alliance, since 2009 frozen shrimp import values have steadily increased, while domestic and import wholesale prices are trending upward.

Department of Justice (DOJ) Files Four Cases with the Court of International Trade (CIT) Targeting Antidumping Duty Evasion

The DOJ, on behalf of U.S. Customs and Border Protection (CBP), is seeking to recover antidumping duties and penalties levied by CBP in four cases involving imports of steel butt-weld pipe fittings, wire hangers, and polyethylene retail carrier bags from China. A combined total of about $3.5 million of penalties and duties is being sought for collection.

United States v. CoStar, Inc. (Nov. 4, 2014)

Three Importers Contest CBP’s Requests for Single Transaction Bonds as Additional Security for AD/CVD Concerns in the CIT

CBP requests single transaction bonds as additional security to protect the revenue when it has reasonable suspicions that imports may be subject to additional AD/CVD duties. In three CIT cases filed in September and November 2014 involving imports of garlic from China and magnesia carbon brick allegedly from Vietnam, importers are beginning to challenge CBP’s requests for single transaction bonds for AD/CVD concerns. The three cases are:

Kwo Lee, Inc. v. United States
International Fresh Trade Corp. v. United States
FedMet Resources Corporation v. United States

CBP AD/CVD Entry Processing in FY 2014

- CBP processed 279,890 new AD/CVD imports.

- CBP administered 1,532 AD/CVD instruction messages sent from the U.S. Department of Commerce, including 922 liquidation instructions to assess final AD/CVD duties.

- CBP assessed final duties on 142,481 AD/CVD entries.

Industry Outreach

- The annual CBP and Steel Industry Partnership meeting was held on October 21, 2014. CBP and the Steel Industry reaffirmed their partnership and will continue the steel seminar programs at the ports of entry. The U.S. steel industry works in partnership with CBP to enforce U.S. trade laws by providing trade intelligence and training to CBP personnel at various ports annually. Steel products constitute the largest group of AD and CVD orders, over 42 percent of all orders.

- CBP has an e-Allegations system to report trade violations at https://apps.cbp.gov/eallegations/
AD/CVD Enforcement: 19 U.S.C. § 1592 Penalties

In Fiscal Year 2015, CBP issued 11 penalties under 19 USC 1592 for Antidumping and Countervailing Duty (AD/CVD) violations for $3,221,913. The following commodities were affected: Bedroom furniture; electro hydraulic units; citric acid and sodium citrate (2 cases); seamless carbon and alloy Steel; mattress spring coils; aluminum profiles; tires (2 cases); and, carbon corrosion resistant steel.

ACE Reports

Effective May 11, 2015, all existing AD/CVD reports in the Automated Commercial Environment (ACE) secure data portal will be replaced with new reports designed to enhance AD/CVD oversight and provide data for both ACE and ACS entries. Personally customized AD/CVD reports currently saved in ACE users' "My Favorites" folder will no longer work.

The following two new reports will replace the existing AD/CVD reports for all trade users:

- ES-105 ADCVD Active Case List:
  - This report provides high-level information for active AD/CVD cases. It is meant to serve as a replacement for the Active Antidumping Cases and Active Countervailing Cases data files posted to CBP.gov.

- ES-109 ADCVD Entry Summary Liquidation:
  - This report provides information on unliquidated AD/CVD entry summaries and/or AD/CVD entry summaries liquidated over a particular time period. It is meant to serve as a replacement for the previous ESM-8027 report in ACE.

Prepare Now for November Transition to ACE for Entry/Entry Summary Filing

On November 1, 2015, ACE will become CBP’s official system of record for all electronically transmitted entry and corresponding summary data. Filers who are not prepared to file entries/entry summaries in ACE on November 1 could face delays in cargo processing, impacting release of entry goods at the border, since entries/entry summaries not filed in ACE will be filed as paper transactions.

Recent Accomplishments: 1st and 2nd Quarter FY2015

Automotive and Aerospace (A&A) Center for Excellence and AD/CVD Alert issued a revenue alert on March 10, 2015 in response to this discovery. The revenue alert highlighted a $50,459 recovery in the Port of Memphis based on the review of off-the-road tires for which AD/CVD deposits had not been paid.

On March 18, 2015, the completion of several entry summary reviews of Chinese off-the-road tires resulted in the collection of $133,262 in unpaid AD/CVD deposits at the Port of Newark.

The top commodities involving AD/CVD violations include:

- Magnesia carbon brick
- New pneumatic off-the-road tires
- Seamless line & pressure pipe from Germany
- Steel wire hangers
- Non-oriented electrical steel from Sweden
- Passenger tires
- Refined brown aluminum oxide
- Monosodium glutamate
- Solar cells from Taiwan
Percentage of AD/CVD Entry Summaries filed in ACS vs ACE by Fiscal Year

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>Percent in ACE</th>
<th>Percent in ACS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>0.11</td>
<td>99.89</td>
</tr>
<tr>
<td>2011</td>
<td>0.17</td>
<td>99.83</td>
</tr>
<tr>
<td>2012</td>
<td>0.47</td>
<td>99.53</td>
</tr>
<tr>
<td>2013</td>
<td>11.59</td>
<td>88.41</td>
</tr>
<tr>
<td>2014</td>
<td>26.03</td>
<td>73.97</td>
</tr>
<tr>
<td>2015</td>
<td>57.34</td>
<td>42.66</td>
</tr>
<tr>
<td>2016</td>
<td>72.59</td>
<td>27.41</td>
</tr>
</tbody>
</table>

Fiscal Year 2015 19 U.S.C. §1592
Penalties for AD/CVD Violations.

During FY 2015, U.S. Customs and Border Protection, CBP, assessed penalties under 19 U.S.C. §1592 for fraud, gross negligence, and negligence for AD/CVD violations for more than $51 million. The penalties covered imports of commodities such as: aluminum extrusions, bedroom furniture, carbon and alloy steel, citric acid and sodium citrate, laminated woven sack, large diameter line pipe, pencils, petroleum candles, polyethylene bags, and tires.

CBP Penalizes Two Wire Hanger Importers

In other penalty actions, CBP imposed $420,478 in civil penalties on two importers from China for evading the antidumping duty order on wire hangers. CBP found that both importers failed to properly report the imports as subject to antidumping duties and failed to pay the antidumping duties. This resulted in a potential loss of revenue of $1.4 million in antidumping duties. CBP found the importers negligent because of false statements and false invoicing. CBP is continuing its enforcement of the antidumping duty orders on wire hangers from China, Vietnam and Taiwan.

Texas-Based Importers Agree to Pay $15 Million to Settle False Claims Act Suit for Alleged Evasion of Customs Duties

The Department of Justice, DoJ, stated that University Furnishings LP and its general partner, Freedom Furniture Group Inc. (collectively known as University Furnishings) agreed to pay $15 million to resolve a lawsuit brought under the False Claims Act. It was alleged that the companies made or conspired with others to make false statements regarding the tariff classification in order to avoid paying duties on wooden bedroom furniture imported from the People’s Republic of China.

2016 Customs Steel Seminars

CBP’s steel industry partners will be presenting five seminars in 2016. The partners are:

- American Iron and Steel Institute
- Committee on Pipe and Tube Imports
- Specialty Steel Industry of North America
- Wire Rod Producers’ Coalition
- Pre-Stressed Concrete Railroad Tire Wire Coalition
- Steel Grating Coalition
- Long Product Producers’ Coalition

The schedule for the steel seminars is:

<table>
<thead>
<tr>
<th>Location</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laredo, TX</td>
<td>February 23-25</td>
</tr>
<tr>
<td>New Orleans, LA</td>
<td>April 12-14</td>
</tr>
<tr>
<td>Philadelphia, PA</td>
<td>May 17-19</td>
</tr>
<tr>
<td>Los Angeles / Long Beach CA</td>
<td>July 19-21</td>
</tr>
<tr>
<td>Detroit, MI</td>
<td>August 23-25</td>
</tr>
</tbody>
</table>
Hearing on the Global Steel Industry

On April 21, the U.S. government held a public hearing on “Recommendations on the Global Steel Industry Situation and the Impact on U.S. Steel Industry and Market.” The hearing was chaired by Ambassador Michael Froman and Commerce Secretary Penny Pritzker, with officials from CBP, and the Departments of State, Treasury, and Labor.

The eleven panelists of industry and Congressional representatives discussed the severe economic challenges of the U.S. steel industry resulting from global steel overcapacity, and from steel overcapacity in China in particular. The panelists called for verifiable reductions in Chinese steel capacity and subsidies to the Chinese steel industry, as well as reductions in steel capacity in other countries, such as South Korea and Turkey.

Many panelists also advocated for strong enforcement of antidumping and countervailing duty laws by both the Commerce Department and CBP. AD/CVD enforcement is a priority for CBP, and CBP is implementing enhanced steel enforcement measures on high-risk steel imports.

CBP Penalizes Wire Hanger Importers

CBP imposed $3.9 million in civil penalties on three importers for evading the antidumping duty order on wire hangers from China. CBP found that these importers failed to properly report the imports as subject to antidumping and failed to pay the antidumping duties. This resulted in a potential loss of revenue of $3.4 million in antidumping duties. CBP found the importers to be negligent of making false statements and false invoicing. CBP is continuing its enforcement of the antidumping duty orders on wire hangers from China, Vietnam and Taiwan. Note: This is an update to the article in the January 2016 AD/CVD Update.

CSMS Messages

On March 4, the Department of Commerce initiated its less-than-fair-value and countervailing duty investigations on “Stainless Sheet and Strip from China” (Initiation Notices). These investigations have been assigned the following case numbers: A-70-042 and C-570-043.
EXHIBIT 3

STAFF REPORT PREPARED FOR SENATOR RON WyDEN

“DUTY EVASION: HARMING U.S. INDUSTRY AND AMERICAN WORKERS”
(NOVEMBER 8, 2010)

BEFORE THE TRADE POLICY STAFF COMMITTEE
OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

AMERICAN WIRE PRODUCERS ASSOCIATION

COMMENTS CONCERNING CHINA’S COMPLIANCE WITH WTO COMMITMENTS
(DOCKET NUMBER USTR-2016-0012)

SEPTEMBER 21, 2016
STAFF REPORT

DUTY EVASION:

HARMING U.S. INDUSTRY AND AMERICAN WORKERS

Prepared for Senator Ron Wyden

November 8, 2010
# Table of Contents

**Introduction** ........................................................................................................... 5

**Part I: Email Correspondence Showcasing Companies’ Willingness to Evade AD/CV Duties** ............ 7

- **Certain Steel Nails from China** ........................................................................... 9  
  Companies Willing to Evade U.S. AD/CV Duties on Steel Nails. .......................... 10

- **Certain Lined Paper School Supplies from China** ............................................. 19  
  Companies Willing to Evade U.S. AD/CV Duties on Paper Products .................... 20

- **Light-Walled Rectangular Pipe and Tube from China** ........................................ 27  
  Companies Willing to Evade U.S. AD/CV Duties on Light-Walled Rectangular Pipe and Tube ................................................................. 28

- **Uncovered Innersprings Units from China** ....................................................... 31  
  Companies Willing to Evade U.S. AD/CV Duties on Uncovered Innersprings Units. 32

- **Natural Bristle Paint Brushes from China** ....................................................... 35  
  Companies Willing to Evade U.S. AD/CV Duties on Natural Bristle Paint Brushes 36

- **Oil Country Tubular Goods (OCTG) from China** .............................................. 41  
  Companies Willing to Evade U.S. AD/CV Duties on OCTG from China Company 42

- **Diamond Sawblades from China** ..................................................................... 45  
  Companies Willing to Evade U.S. AD/CV Duties on Diamond Sawblades from China 46

- **Steel Wire Garment Hangers from China** ....................................................... 49  
  Companies Willing to Evade U.S. AD/CV Duties on Steel Wire Garment Hangers from China ................................................................. 50

- **Steel Grating from China** .................................................................................. 53  
  Companies Willing to Evade U.S. AD/CV Duties on Steel Grating ....................... 54

**Part II: Foreign Logistics Companies Willing to Evade U.S. AD/CV Duties** ............................... 55

- **Eversky International Forwarding Agency** ...................................................... 57

- **H&T International Logistics Ningbo Ltd** ......................................................... 57

- **Ninbo Star International Freight Forwarding Co., Ltd** ...................................... 58

- **Pulinktrans China, Ltd.** ..................................................................................... 58

- **Shenzhen Sunpower International Logistics, Ltd** ........................................... 59

- **Wintrans Logistics and Investment & Management Co., Ltd** .......................... 59

- **Gateway Container Line Co., Ltd** .................................................................... 60

- **Global Success International Transportation (Shenzen) Ltd** ......................... 61

- **Dyna International Shipping Ltd** ..................................................................... 61
# Table of Contents (cont’d)

Part II: Foreign Logistics Companies Willing to Evade U.S. AD/CV Duties (cont’d)

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hanhen Shipping (China) Co., Ltd</td>
<td>62</td>
</tr>
<tr>
<td>Suzhou Yuncheng Ex/Im Co., Ltd</td>
<td>62</td>
</tr>
<tr>
<td>L’Assurex International Logistic Ltd.</td>
<td>63</td>
</tr>
</tbody>
</table>

Part III: Examples of Companies Advertising Illegal Transshipment Services on the Internet ........................................ 65

References ........................................................................................................................................... 79
Introduction

U.S. antidumping and countervailing duty (AD/CVD) laws form U.S. industry’s protective backbone against injury from unfair trade. These laws provide American producers the ability to counter injurious unfair trade practices and ultimately allow for the imposition of additional duties on unfair imports.

Each year, U.S. companies collectively spend millions of dollars to initiate and litigate AD/CVD cases to keep illegally dumped or subsidized imports from entering the U.S. market and injuring them. Unfortunately, many U.S. producers believe that the evasion of America’s unfair trade laws is increasingly pervasive. The circumvention of U.S. AD/CVD laws, either by foreign producers or importers, negatively affects industries throughout the United States, resulting in continued injury to U.S. industry, the loss of American jobs, and the loss of federal revenue.

Foreign suppliers subject to AD/CVD orders and their U.S. importers avoid paying AD/CV duties by a number of unscrupulous schemes, including illegal transshipment and falsified country of origin markings, undervalued invoices to pay less duty, and misclassification of goods. In sum, they cheat.

Staff set out to determine just how easy it is to find these trade cheats and determine the ease at which an importer could identify a foreign supplier willing to engage in circumvention schemes. In August 2010, staff created a fictitious company called AvisOne Traders, Inc. and set up a company profile on China’s largest business-to-business e-commerce website, Alibaba.com, in order to find companies willing to cheat and evade AD/CVD orders. (AvisOne is an anagram for “evasion.”)

The results are alarming and illustrative of how widespread the problem of duty evasion appears to be. In under two weeks and for as little as 30 minutes a day, one staff person, acting as a “purchasing manager” for AvisOne Traders, Inc., contacted roughly 120 companies through Alibaba.com and received 47 responses. Of these 47, this staff person received written confirmation from 10 Chinese companies that were willing to evade duties on five different products subject to U.S. AD/CVD orders. These products include uncovered innersprings units, lined paper school supplies, steel nails, natural bristle paint brushes, and light-walled rectangular pipe and tube. The AD/CVD orders on this merchandise, which represents just a small fraction of all AD/CVD orders currently in place, were put in place to protect over 120 businesses and 12,000 workers from unfairly traded imports.

This report is a compilation of information obtained by staff over a two-week period, and is organized into three parts. Part I presents e-mail correspondence between staff, acting under the auspices of AvisOne Traders, and Chinese producers. In a couple of additional examples, staff obtained from the counsel of U.S. industry non-solicited e-mails from Chinese producers offering to facilitate the evasion of AD/CVD orders. Part II presents a list of publically identified Chinese companies that advertise—in English—their ability to facilitate the evasion of AD/CVD laws. Part III includes snapshots of company websites that offer services designed to evade AD/CVD laws (in one instance, a website operated by the Chinese government itself and which advertises the services of a Chinese firm that facilitates evasion).

In the event that staff corresponded with a Chinese firm that is of interest to U.S. law enforcement, two versions of this report were prepared. A confidential version containing comprehensive information about the firms with which staff corresponded was provided to U.S. Customs and Border Patrol and Immigration and Customs Enforcement. This version, a public redacted version, was prepared in order to be shared with Members of Congress and their staff.
Part I:
Email Correspondence Showcasing Companies’ Willingness to Evade AD/CVD Orders
Certain Steel Nails from China

(DOC Case No. A-570-909)

Steel nails have a shaft length up to 12 inches, and include steel nails made of round wire and nails that are cut. They may be made of any type of steel, and have a variety of finishes. Nails are used in the construction of houses and used to make furniture and cabinets, among other applications.

Industry at a Glance:

⇒ Subject to AD order since August 1, 2008 (DOC)
⇒ Number of U.S. producers in 2007: 17
⇒ U.S. employment of production and related workers in 2007: 791
⇒ Leading sources of U.S. imports (by value) in 2007: China, Korea, United Arab Emirates (USITCa, USITCb)

U.S. Production Locations of Steel Nails
Companies Willing to Evade U.S. AD/CV Duties on Steel Nails

Staff, posing as a U.S. trading company, contacted these three Chinese steel nail producers/traders via Alibaba.com to inquire whether these companies could avoid paying duties on steel nails by illegal transshipment. In the first instance, Company A offered to transship when it was proposed by staff. In the second and third instances, Companies B and C directly proposed to illegally transship as a way to avoid paying duties. Below are transcripts of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company A
Product: Steel Nails
Country of origin: China
Means to evade duties: Illegal transshipment

From: feedback@service.alibaba.com
To: ***
Sent: Tues, August 31, 2010 5:12 AM
Subject: [avisonetraders@gmail.com] I want to buy the product you are selling on Alibaba.com

Dear ***,
You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer’s Message
Subject: I want to buy the product you are selling on Alibaba.com.
Dear Sir:
We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your concrete steel nails? Also, are your steel nails subject to any U.S. antidumping duties?

Thank you,
Paul Union, Purchasing Manager
AvisOne Trading Company, Ltd.
Tel: (503) 583-4237
Email: AvisOneTraders@gmail.com

Explanation:
In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company A via Alibaba.com, China’s largest e-commerce platform.

AvisOne Traders—Providing the Highest Quality Product at the Most Competitive Prices
Company A (cont’d)

From: ***
Sent: Tues, August 31, 2010 10:57 PM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: Concrete nail

Hi, dear sirs:

Thanks for your enquiry about nails

To take this opportunity, we are very glad to introduce our company to you. We are the professional manufacturer and exporter with high reputation in TianJin city China, handling of nail products etc. Pls let us know the concrete nails specification of you required, we will quote you our lowest price on based of that.

We are looking forward to your early reply.

Best regards.,

***

From: “Paul Union” <avisonetraders@gmail.com>
Sent: Fri, September 3, 2010 8:36 AM
To: ***
Subject: Re: Concrete nail

Dear ***,

Thanks for your reply. Are you nails subject to any U.S. anti-dumping duties? If so, in your experience is there any way to avoid paying the duties?

Regards,

Paul

Explanation:
Company A describes its business and products. In the second email, staff asks if it is possible to avoid paying duties.
Company A (cont’d)

From:  ***
Sent:  Sun, September 5, 2010 10:47 PM
To:  “Paul Union” <avisonetraders@gmail.com>
Subject:  Re: Concrete nail

Hi, dear Paul:

Thanks for your email.

We have exported our products to U.S but the customer avoid the duties by themselve. So we do not know how can they avoid the duties. Sorry about that. But we can promise our products quality can meet your requirement.

Best regards.,
***

From:  <avisonetraders@gmail.com>
Sent:  Wed, September 8, 2010 7:48 AM
To:  ***
Subject:  Re: Concrete nail

Dear ***,
Thanks for your reply. Would it be possible to transship the product through a third country and change the country of origin in order to avoid paying the duties?

Best regards,
Paul Union

From:  ***
Sent:  Wed, September 8, 2010 11:12 PM
To:  “Paul Union” <avisonetraders@gmail.com>
Subject:  Re: Concrete nail

Dear Paul Union:

Thanks for your email.

As you said, we can arrange the container shipping from Xingang to Malaysia, Bangladesh or Singapore. And the shipping agent can help us to issue the original certification, it will increase the cost but I think it must be lower than duties.

Best regards,
Company B
Product: Steel Nails
Country of origin: China
Means to evade duties: Illegal transshipment

From: feedback@service.alibaba.com
To: ***
Sent: Tues, August 31, 2010
Subject: [avisonetraders@gmail.com] Inquiry about your product

Dear ***,
You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer’s Message
Subject: Inquiry about your product
Dear sir:
We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your concrete nails? Also, are your steel nails subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager
AvisOne Trading Company, Ltd.
Tel: (503) 583-4237
Email: AvisOneTraders@gmail.com

AvisOne Trades - Providing the Highest Quality Product at the Most Competitive Prices

Explanation:
In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company B via Alibaba.com, China’s largest e-commerce platform.
Company B (cont’d)

From: ***
Sent: Wed, September 1, 2010 3:02 AM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: [avisonetraders@gmail.com] inquiry about your product

Dear Mr Paul Union,
How are you?
Our factory have produced the steel nail for 46 years.
If you need the quotation, please inform me the exact information include the diameter of the wire
nail, length of the nail, surface treatment and also the packing demand.
Sincerely thanks and best regards!
Yours ***

From: “Paul Union” <avisonetraders@gmail.com>
Sent: Fri, September 3, 2010 8:33 AM
To: ***
Subject: [avisonetraders@gmail.com] inquiry about your product

Dear ***
Thanks for your response. Are your concrete nails subject to any U.S. anti-dumping duties? If so, in
your experience is there any way to avoid paying the duties?

Regards,
Paul

From: ***
Sent: Sat, September 4, 2010 1:29 AM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: [avisonetraders@gmail.com] inquiry about your product

Dear Paul,
How are you?
Thank you for your e-mail. We have export the concrete nails to Canada then to U.S or other country
then to U.S. Our coil nail to U.S. do not need pay the duties.
If you have any other company in Canada or Singapore?
Maybe it is better way to avoid paying the duties.
Sincerely thanks and best regards!
Yours ***

Explanation:
In the first email, Company B describes its business and products. In the second email, staff asks if it is possible to avoid paying duties. Company B responds that it already engages in illegal transshipment.
Dear ***,
You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer’s Message
Subject: Inquiry about your product
Dear sir:
We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your concrete nails? Also, are your steel nails subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager
AvisOne Trading Company, Ltd.
Tel: (503) 583-4237
Email: AvisOneTraders@gmail.com

AvisOne Trades - Providing the Highest Quality Product at the Most Competitive Prices
Company C (cont’d)

From: ***
Sent: Tue, August 31, 2010 10:23 PM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: concrete steel nails

Dear sir,

Good day! I am ***, from ***. I got your message on alibaba. so if you have any need, please contact me.

Best regard.
***

From: “Paul Union” <avisonetraders@gmail.com>
Sent: Fri, September 3, 2010 8:37 AM
To: ***
Subject: Re: concrete steel nails

Thanks for your reply. I'm looking for concrete steel nails. Are these products subject to U.S. antidumping duties? **If so, is there any way to avoid paying the duties?** Regards,
Paul

From: ***
Sent: Tue, August 31, 2010 10:23 PM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: concrete steel nails

Dear sir,

Yes, you want concrete steel nails?

**if you want to avoid paying the duties, there is the way is send the goods to Malaysia and change a box, then send to U.S.**

so what do you think about it.

Best regard.
Company C (cont’d)

From: “Paul Union” <avisonetraders@gmail.com>
Sent: Wed, September 8, 2010 7:19 AM
To:  
Subject: Re: concrete steel nails

Thank you for your reply. So you can transship through Malaysia and change the country of origin to avoid paying the anti-dumping duties? Can your company do that?

Regards,
Paul

From:  
Sent: Wed, September 8, 2010 8:43 PM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: concrete steel nails

Dear sir ,

Thanks for your reply .

Yes .our company can do this .but in this way .the cost will increase .

and just tell me your details product information .

Best regard .

Explanation:
Staff respond to Company C to confirm that it can transship product through Malaysia and change the country of origin of the product. Company C confirms its ability to illegally transship.
Certain Lined Paper School Supplies from China

(DOC Case No. A-570-901)

Lined paper school supplies include spiral-bound and wireless notebooks, hole-punched filled paper, and composition books. The paper is typically white and wide-ruled or college-ruled.

Industry at a Glance:

⇒ Subject to AD order since September 28, 2006 (DOC)
⇒ Number of U.S. producers in 2005: 13
⇒ U.S. employment of production and related workers in 2005: 942
⇒ U.S. production locations: California, Georgia, Iowa, Massachusetts, New York, Pennsylvania, Tennessee, Texas, Wisconsin (USITCc, USITCd)

U.S. Production Locations of Lined Paper School Supplies
Companies Willing to Evade U.S. AD/CV Duties on Paper Products

Staff, posing as a U.S. trading company, contacted Companies D and E via Alibaba.com to inquire whether they could avoid paying duties on paper school supplies. In the first instance, Company D proposes illegal transshipment through Malaysia to avoid paying duties. In the second instance, Company E professes that it does not know how to avoid paying antidumping duties. However, it states that it deliberately undervalues the value of its products, which is another form of duty evasion. Below are transcripts of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company D
Product: Paper school supplies
Country of origin: China
Means to evade duties: Illegal transshipment through Malaysia

From: feedback@service.alibaba.com
To: ***
Sent: Wed, September 1, 2010
Subject: [avisonetraders@gmail.com] I want to buy the product you are selling on Alibaba.com

Dear ***,
You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this send. Mr. Paul Union is interested in your company.

Buyer’s Message
Subject: Inquiry about your product

Dear Sir:
We are a small trading company based in Oregon that supplies a diverse array of products to regional customs in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your lined paper products? Also, are your lined paper products subject to any U.S. antidumping duties?

Thank you,
Paul Union, Purchasing Manager
AvisOne Trading Company, Ltd.
Tel: (503) 583-4237
Email: AvisOneTraders@gmail.com

AvisOne Traders—Providing the Highest Quality Product at the Most Competitive Prices

Explanation:
In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company D via Alibaba.com, China’s largest e-commerce platform.
Company D (cont’d)

From:  ***
Sent:  Tue, August 31, 2010 10:04 PM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: Re: Inquiry about your product

Dear Paul,

It’s please to get your enquiry from alibaba. Our factory ***, specializing in paper printing products, stationery notepad is our main product.

Herely I sending you our catalogue, pls check it, hop to meet your interesting. And customed item wel-come.

Actually, paper notebook is subjected to U.S. antidumping duties, because the our price is lower much than US market.

Looking forward to your soonly response.

Best regards,
***

From: “Paul Union” <avisonetraders@gmail.com>
Sent:  Fri, September 3, 2010
To:  ***
Subject:  Re: Inquiry about your product

Dear ***,
Thank you for your response. Is there any way to avoid paying the anti-dumping duties in your experi-ence?

Regards,
Paul

Explanation:
In the first email, Company D describes its business and products. In the second email, staff asks if it is possible to avoid paying duties.
Company D (cont’d)

From: ***
Sent: Wed., September 8, 2010 5:44 AM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: Re: Inquiry about your product

Dear Paul,
Notebook of A4, A5, A6 size subjected to U.S. antidumping duties, other size no problem.  Solution is Shipping goods to Malaysia, transship to America to avoid paying the anti-dumping duties.

How do you think about this solution?
Looking forward to hearing from you soon.

Thanks & Best regards,
***

From: “Paul Union” <avisonetraders@gmail.com.
Sent:  Wed., September 8, 2010 7:20 AM
Subject: Re: Inquiry about your product

Dear ***

Thank you for your reply. Can your company transship through Malaysia and change the country of origin in order to evade the anti-dumping duties?

Best regards,
Paul Union

From: ***
Sent: Wed., September 8, 2010 7:31 AM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: Re: Inquiry about your product

Dear Paul,

Thanks for your quick reply. yes, we can do that, but first of all, you should tell me what kind of notebook are you seeking for your market, then I give you the CNF or CIF price, if price is suitable for your market, let's talk over further more.

Looking forward to your early reply with your inquiry.

Thanks & best regards,
***
Company E
Product: Paper school supplies
Country of origin: China
Means to evade duties: Undervaluation of invoice to pay less duty

From: feedback@service.alibaba.com
To: ***
Sent: Wed, September 1, 2010
Subject: [avisonetraders@gmail.com] Inquiry about your product (AdminGenerate)

Dear ***,
You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this send.

Mr. Paul Union is interested in your company.

Buyer’s Message
Subject: Inquiry about your product
Dear Sir:
We are a small trading company based in Oregon that supplies a diverse array of products to regional customs in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your lined paper products? Also, are your lined paper products subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager
AvisOne Trading Company, Ltd.
Tel: (503) 583-4237
Email: AvisOneTraders@gmail.com

Explanation:
In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company E via Alibaba.com, China’s largest e-commerce platform.

AvisOne Traders—Providing the Highest Quality Product at the Most Competitive Prices
Dear paul,
Let me introduce my company to you, my company—*** is specialized in the manufacturer of various color printed paper cards, paper handbags, packing boxes, gift boxes, labels, tags, brochures, posters, packing materials and other related products for 20 years. Providing 'Quality Products, Excellent Service, Competitive Prices and Prompt Delivery', pls kindly browse our website: *** for free! we can not only design and produce unique and fashion style products but also can make products according to your requirements, and your design is welcome Attachment is our catalogue about some paper bags and boxes, pls check it! If you have some new inquiry, pls contact us for free! Await for your prompt reply!
Best regard
***

From: “Paul Union” <avisonetraders@gmail.com>
Sent: Fri, September 3, 2010 8:00 PM
To: ***
Subject: Re: Our product

Dear ***,
Thank you for your message. Are your paper notebooks subject to U.S. anti-dumping duties? In your experience, is there any way to avoid paying the anti-dumping duties?

Regards,
Paul
Dear Paul,

Thank you for your reply!
I am sorry so late reply you! **we have no experience to avoid paying the anti-dumping duties**, **besides we make the commercial invoice, we write that the value of products is less than the factual cost**.

Await for your prompt reply!
Best regard!

***

**Explanation:**
In this email, Company E states that it does not know how to avoid paying antidumping duties, but professes that it undervalues products on commercial invoices, which is a form of duty evasion.
Light-Walled Rectangular Pipe and Tube from China

(DOC Case No. A-570-501)

Carbon-quality welded light-walled rectangular pipe and tube is often referred to as ornamental or mechanical tubing. Principal uses include ornamental fencing, window guards and framing, and railings for construction and agricultural applications. It is also used in metal furniture, athletic equipment, and store display shelves.

Industry at a Glance:
⇒ Subject to AD/CVD orders since August 5, 2008 (DOC)
⇒ Number of U.S. producers in 2007: 28
⇒ U.S. producers’ total shipments in 2007: $513 million
⇒ U.S. employment of production and related workers in 2007: 973
⇒ U.S. production locations: Alabama, Arizona, Arkansas, California, Georgia, Illinois, Indiana, Kentucky, Michigan, Missouri, Mississippi, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Wisconsin (USITCe, USIT Cf)

U.S. Production Locations of Light-Walled Rectangular Pipe and Tube

Map source: http://www.coloringcastle.com
Companies Willing to Evade U.S. AD/CV Duties on Light-Walled Rectangular Pipe and Tube from China

Staff, posing as a U.S. trading company, contacted Company F via Alibaba.com to inquire whether its rectangular pipe and tube products are subject to U.S. antidumping duties and whether it could avoid paying such duties. Below is a transcript of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company F
Product: Pipe and tubular products
Country of origin: China
Means to evade duties: Illegal transshipment, also known as “entrepot” trade

From: feedback@service.alibaba.com
To: ***
Sent: Tues, August 31, 2010 5:52 AM
Subject: [avisonetraders@gmail.com] I want to buy the product you are selling on Alibaba.com

Dear ***:
You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer’s Message
Subject: I want to buy the product you are selling on Alibaba.com.
Dear Sir:
We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your rectangular tubular products? Also, are your light-walled rectangular tubular products subject to any U.S. antidumping duties?

Thank you,
Paul Union, Purchasing Manager
AvisOne Trading Company, Ltd.
Tel: (503) 583-4237
Email: AvisOneTraders@gmail.com

Explanation:
In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company F via Alibaba.com, China’s largest e-commerce platform.
Company F (cont’d)

From: ***
Sent: Fri, September 3, 2010 4:42 AM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: To Paul Union

Dear Paul Union

HAPPY WEEKEND. and hope you received my qoutation of *** rectangular pipes .

About the antidumping duties .I check up alots of information on the net .I still can’t sure if rectangular tubular products subject to any U.S. antidumping duties. Many informations said that On May 3rd, the InternationalTradeCommission voted for Chinese steel 99.14% at the tax antidumping tariffs on imports. Are you clear about this ??

Hope you can tell me more about .

Yours
***

From: “Paul Union” <avisonetraders@gmail.com>
Sent: Fri, September 3, 2010 7:37 AM
To: ***
Subject: Re: To Paul Union

***,

Thank you for your message. I am not sure if rectangular tubing is subject to U.S. anti-dumping duties. Is there any way to avoid paying the anti-dumping duties? Would it be possible to modify the country of origin certificate?

Regards,
Paul

Explanation:
In the first email, Company F is not sure whether rectangular pipe and tube is subject to antidumping duties. In the second email, staff ask if it is possible to change the country of origin to avoid paying duties.
Company F (cont’d)

From: ***
Sent: Sat, September 4, 2010 6:38 AM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: Re: To Paul Union

Dear Paul Union:
Thanks for your e-mail and have a good day.
I search a lot. Yes, there has a way to avoid paying the antidumping duties. It's entrepot trade. Export documents issued by the third countries so that facilitate you in yours customs clearance, avoid "anti-dumping duties"customs clearance. Can you accept the export file as payment terms, at the same time to third countries as its export documents, can reduce clearance documents tariffs?
And i've make certain about that rectangular tubular products subject to any U.S. antidumping duties. Do you have any questions?
Yours Sincerly
***

From: “Paul Union” <avisonetraders@gmail.com>
Sent: Wed, September 8, 2010 7:45 AM
To: ***
Subject: Re: To Paul Union

Dear ***,
My apologies for my late reply. If I understand correctly, entrepot trade would involve transshipping the rectangular tubular products to another country in order to change the country of origin to avoid paying the anti-dumping duties on Chinese product? Can your company do this?

Best regards, Paul

From: ***
Sent: Thur, September 9, 2010 6:02 AM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: Re: To Paul Union

Dear Paul Union:
How are you recently?
Yes you are right, entrepot trade would involve transshipping the rectangular tubular products to another country in order to change the country of origin to avoid paying the anti-dumping duties on Chinese product. I find a company can do this. But the products's price would be a little higher.
Uncovered Innersprings Units from China

(DOC Case No. A-570-928)

Uncovered innerspring units are composed of a series of individual metal springs joined together and used as the innerspring component in the manufacture of innerspring mattresses.

*Industry at a Glance:*

⇒ Subject to AD order since February 19, 2009 (DOC)
⇒ Number of U.S. producers in 2008: 8
⇒ U.S. producers’ total shipments in 2007: $539 million
⇒ U.S. employment of production and related workers in 2007: 2,970
⇒ U.S. production locations: Florida, Georgia, Kentucky, Michigan, Missouri, Mississippi, North Carolina, Texas, Wisconsin (USITCg, USITCh)

U.S. Production Locations of Uncovered Innerspring Units

Map sources: http://www.mappingcastle.com
Companies Willing to Evade U.S. AD/CV Duties on Uncovered Innersprings Units

Staff, posing as a U.S. trading company, contacted Company G via Alibaba.com to inquire whether it could avoid paying duties on uncovered innersprings units. Company G proposed illegally transshipping product through a third country, or undertaking minor assembly in the United States to avoid paying duties. Below is a transcript of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company G
Product: Uncovered innersprings units
Country of origin: China
Means to evade duties: Illegal transshipment or minor assembly in United States

From: feedback@service.alibaba.com
To: ***
Sent: Tues, August 31, 2010
Subject: [avisonetraders@gmail.com] I want to buy the product you are selling on Alibaba.com

Dear ***
You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer’s Message
Subject: I want to buy the product you are selling on Alibaba.com.
Dear Sir:
We are a small trading company based in Oregon that supplies a diverse array of products to regional customs in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your innersprings units? Also, are your innersprings units subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager
AvisOne Trading Company, Ltd.
Tel: (503) 583-4237
Email: AvisOneTraders@gmail.com

Explanation:
In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company G via Alibaba.com, China’s largest e-commerce platform.
Dear Paul,

Thanks for your letter, and thanks for you are interested in our company.

We offer our price, as follows:
Wire :13g,(2.3mm). helical wire:17g (1.4mm) border 6g(4.88mm)
T type  36.5"*73.5"*6"  9*24  10.7Kgs  FOB Tianjin US$11.07/pc
F type  51.5"*73.5"*6"  13*24  14.9kgs  FOB Tianjin US$15.4/pc
Q type 58.5"*78.5"*6"15*26      18.3kgs  FOB Tianjin US$18.92/pc
K type 74.5"*78.5"*6"  18*26  22kgs FOB Tianjin US$22.75/pc

Loading about 1250pcs in one 40' container. Gross weight 24Mt, Net weight :20Mt.

Yes, our innerspring units is under U.S. antidumping duty, so we have two ways to export to your country: 1) Transit from the third part country, but would add about US$3000/40'container fee for the third part country. 2) We could export the springs and the helical wire to your country, then you could make up them together by yourself.

What do you think, please let me know without any hesitation.

Thanks & Best Regards

***
Natural Bristle Paint Brushes from China

(DOC Case No. A-570-501)

Natural bristle paint brushes are made with natural (hog) bristle or other types of animal hair, and are used primarily to apply paint, stain, or varnish. Paint brushes come in several quality ranges and in a wide variety of widths and lengths.

**Industry at a Glance:**

- Subject to AD order since February 14, 1986 (order terminated July 30, 2010 due to lack of interest) (DOC)
- Number of U.S. producers in 2003: 12
- U.S. producers’ U.S. shipments in 2003: $33 million
- U.S. production locations: Florida, Illinois, Maryland, New Jersey, New York, Ohio, Oregon, Pennsylvania, Wisconsin (USITCI)

**U.S. Production Locations of Natural Bristle Paint Brushes**

Map source: [http://www.coloringcastle.com](http://www.coloringcastle.com)
Companies Willing to Evade U.S. AD/CV Duties on Natural Bristle Paint Brushes from China

Staff, posing as a U.S. trading company, contacted Company H via Alibaba.com. Although the product is no longer subject to antidumping duties, Company H offered to ship product under a different company’s name to avoid paying duties. The company stated that it could not directly change the country of origin, although it proposed illegally transshipping goods through Taiwan or Hong Kong as a way to avoid paying duties. Below is a transcript of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

**Company H**
Product: Natural Bristle Paint Brushes  
Country of origin: China  
Means to evade duties: Exporting under a different company name (e.g., shipping agent)

From: feedback@service.alibaba.com  
To: ***  
Sent: Tues, August 31, 2010 5:34 AM  
Subject: [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com

Dear ***:  
You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer’s Message  
Subject: I want to buy the product you are selling on Alibaba.com.  
Dear Sir:  
We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your natural bristle paint brushes? Also, are your paint brushes subject to any U.S. antidumping duties?  
Thank you,  
Paul Union, Purchasing Manager  
AvisOne Trading Company, Ltd.  
Tel: (503) 583-4237  
Email: AvisOneTraders@gmail.com

**Explanation:**  
In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company H via Alibaba.com, China’s largest e-commerce platform.
From: ***
Sent: Tue, August 31, 2010 9:06 PM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: Info of Natural bristle brush to Mr. Paul Union from China

Dear Mr Paul Union,

We are pleased to receive your following inquiry of natural bristle paint brush dated 31 August. Many thanks for it.

Yes, there has antidumping duties if we export to US market with natural bristle brush. Most of our US customers import paint roller and polyester brush from us. If you can use polyester brush instead of the bristle brush? Our polyester brush can hold much paints too as its split top end and the price is economic too.

Please let us know your comments about it and we will send you the details within one workday if we get your confirmation.

Best regards,
***

From: “Paul Union” <avisonetraders@gmail.com>
Sent: Fri, September 3, 2010 8:27 AM
To: ***
Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear ***,
Thanks for your response. In your experience, is there any way to avoid paying the anti-dumping duties?

Regards,
Paul

Explanation:
Company H acknowledges that its natural bristle paint brushes are subject to antidumping duties and asks if AvisOne is willing to purchase a different kind of paint brush. In the second email, staff ask Company H if it is possible to avoid paying duties.
Company H (cont’d)

From: ***
Sent: Fri, September 3, 2010 9:27 PM
To: “Paul Union” <avisionetraders@gmail.com>
Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear Paul,

Thanks for your message, **maybe we can export in the name of agent's company that can avoid paying the anti-dumping duties.**

Best regards,
***

From: “Paul Union” 
<avisionetraders@gmail.com>
Sent: Fri, September 3, 2010 8:27 AM
To: ***
Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear ***

My apologies for responding late to your email. **As you describe it, your company can ship product under a different name—in this case, the name of the shipping agent— in order to avoid paying the anti-dumping duties? Is it possible that your company can change the country of origin as well?**

Looking forward to your thoughts on this. Best regards, Paul

From: ***
Sent: Wed, September 8, 2010 9:36 PM
To: “Paul Union” <avisionetraders@gmail.com>
Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear Paul Union,

Thanks for reply. **I checked with the Exit Inspecetion and Quarantine, but the answer is "no" to change the origin country to other.**

Now we don't have any better good thoughts about it, our most customers in America used the polyester material instead or just purchased the rollers. Can you use the polyester to instead the bristle?

Looking forward to your comments.

Best regards,
***
From: ***
Sent: Thur, September 9, 2010 2:00 AM
To: “Paul Union” <avisonetraders@gmail.com>
Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

Dear Paul Union,

Do you know any companies in Taiwan or HK who can help you to export the brushes to your company? We send the brushes to them and then they export to you with their name.

**Explanation:**
In this last email, Company H proposes exporting its brushes to companies in Taiwan or Hong Kong that can then re-export the brushes under those companies’ names.
Oil Country Tubular Goods (OCTG) from China

(OCTG Case No. C-570-944)

OCTG include carbon and alloy steel casing and tubing used in oil and gas wells. Casing is a circular pipe that serves as a structural retainer for the walls of the well. Tubing is installed inside the casing and is used to conduct the oil and gas to the surface.

Industry at a Glance:
⇒ Subject to AD/CVD orders since May 21, 2010 (DOC)
⇒ Number of U.S. producers in 2009: 7
⇒ U.S. producers’ U.S. shipments in 2008: $6.2 billion
⇒ U.S. employment of production and related workers in 2008: 5,819
⇒ U.S. production locations: Alabama, Arkansas, Colorado, Iowa, Kentucky, Ohio, Oklahoma, Pennsylvania, Texas (USITCj, USITCK)

U.S. Production Locations of OCTG

Map source: http://www.coloringcastle.com
Companies Willing to Evade U.S. AD/CV Duties on OCTG from China

Company I is a trading company based in Turkey. It buys and sells Chinese-origin pipe products and changes the country of origin certificate to non-Chinese product. Below is a transcript of email correspondence provided to staff that document a willingness to evade AD/CVD orders on OCTG (highlighted in red). Textboxes provide an explanation of the correspondence.

Company I
Product: Oil Country Tubular Goods
Country of origin: China
Means to evade duties: Changing country of origin certificate

From: ***
Sent: Wed, August 11, 2010 3:45 AM
To: ***
Subject: DEAR *** PIPES FOR USA

DEAR ***

JUST MY BIG SPANISH PARTNER WHICH WE MADE WITH THEM OVER 10 MILLION USD PIPE ORDERS BEFORE SAID, THEY CAN SHIP GOODS FROM VALENCIA SPAIN WITH EU ORIGIN CERTIFICATE. GOODS WILL BE PRODUCED IN CHINA & THEY WILL CHANGE ORIGIN IN SPAIN AND REEXPORT. THIS ONE OK? ALSO OUR SPAIN SELLER CAN OFFER UKRAIN OR EU ORIGIN. BUT SUGGEST ME TARGET PRICE. 4-YOUR MSN OR SKYPE ID? MY SKYPE ID *** MY MSN *** MY MP ***

BEST REGARDS
***

From: ***
Sent: Wed, August 11, 2010 5:32 PM
To: ***
Subject: RE: DEAR *** PIPES FOR USA

***,

**Explanation:**
In this example, Company I, working with its business partners, is offering a U.S. importer Chinese-origin pipe with a false country of origin certificate. The U.S importer recognizes that this is illegal, and ceases communication with Company I.

THIS IS ILLEGAL! It is called “circumvention” and is subject to firm prison time.

We will end all discussion at this stage.
DEAR ***
YOU ARE VEYR HARDWORKING PERSON.
IT MEANS IF THEY CHANGE ORIGIN WITH COATING, PAINTING, BEVELLING ETC FORMALLY, ACCORDING TO EU LAW ALSO NOT POSSIBLE TO USE CHINESE RAW MATERIAL? SO I IGNORE IT.
2-ANY TARGET PRICE AS 0 ANTIDUMPING TAX ORIGINS?

BEST REGARDS
***

Explaination:
Company I acknowledges that Chinese-origin pipe is subject to anti-dumping duties, but “ignores it.”
Diamond Sawblades from China

(DOC Case No. 570-900)

Diamond sawblades are circular cutting tools that have numerous functions and applications for cutting, ranging from cement, asphalt, marble, and tile, to masonry work such as brick and stone.

Industry at a Glance:
- Subject to AD/CVD orders since January 23, 2009 (DOC)
- Number of U.S. producers in 2005: 22
- U.S. producers’ U.S. shipments in 2004: $121 million
- U.S. employment of production and related workers: 480 (finished diamond sawblades only)
- U.S. production locations: California, Georgia, Kansas, Massachusetts, Ohio, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Washington (USITCI, USITCm)

U.S. Production Locations of Diamond Sawblades
Companies Willing to Evade U.S. AD/CV Duties on Diamond Sawblades from China

Companies J and K are Chinese trading companies that import and export diamond sawblades. Company J characterizes antidumping duties as a “political game,” while Company K admits that it engages in illegal transshipment to avoid paying antidumping duties. Below are transcripts of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company J
Product: Diamond sawblades
Country of origin: China
Means to evade duties: Undervaluing invoices and misclassifying goods to avoid paying duties

From: ***
Sent: Thur, December 10, 2009 6:54 AM
To: Sales email account
Subject: Diamond tools and cutting machineries

Dear Sir or Madam,

We are a Chinese company specialized in manufacturing various diamond tools which are widely used in Europe and USA.
Best ratio of quality to price could be achieved with the help of our diamond tools.
I’d like to offer you below tools for a reference in hope that we could be your competent and reliable partner in China.
Once got your requests, I’d like to send you our whole catalogue and pricelist.
Your prompt reply would be mostly appreciated.
Regards
***
Are your saw blades subject to antidumping duties?

Hi Sir,

Thanks for your prompt reply.

I don’t think it’s a big problem for us. We have 3 solutions to help you out of this high duty—it’s just a political game: anti-dumping duty.

1. We can change the actual value of products in the Invoice a little bit.(as for small quantity such as trial order )
2. Our factory has responded to the lawsuit and will only be charged with 20% duty. When you order large quantity, it’s no big deal.
3. We could ship the blades as the category of core.

Moreover, if you have any solutions, we would like to cooperate your actions from our side.

Regards

***

Explanation:
The U.S. importers asks if Company J’s sawblades are subject to antidumping duties. Company J responds that antidumping is a “political game.” Company J offers to undervalue the company invoice or misclassify the goods to avoid paying duties.
Hi ***,

Thanks for getting back to me.

No, we are not affected by the anti-dumping as we can do trans-shipment.

Regards,

***
Steel Wire Garment Hangers from China

(DOC Case No. A-570-918)

Steel wire garment hangers are produced primarily for use by the dry cleaning, industrial laundry, textile, and uniform rental industries.

**Industry at a Glance:**
- Subject to AD order since October 6, 2008 (DOC)
- Number of U.S. producers in 2007: 7
- U.S. producers’ U.S. shipments in 2007: $12 million
- U.S. employment of production and related workers: 139
- U.S. production locations: Alabama, California, Illinois, Kentucky, New Jersey, Texas, Virginia, Wisconsin (USITCn, USITCo)

**U.S. Production Locations of Steel Wire Garment Hangers**

Map source: http://www.coloringcastle.com
Companies Willing to Evade U.S. AD/CV Duties on Steel Wire Garment Hangers from China

Companies L and M are Chinese metal hanger producers. In the first instance, Company L states that it can illegally transship through either Taiwan or Malaysia. In the second instance, Company M states that it can illegally transship via a third country for its “friends.” Below are transcripts of email correspondence provided to staff that document a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

Company L
Product: Steel wire garment hangers
Country of origin: China
Means to evade duties: Illegal transshipment

From: ***
Sent: Thu, January 14, 2010 11:57:59 PM
To: ***
Subject: Re: ***

Attachment is our price list (FOB Shanghai), please find it. We have two ways to ship containers to US. One is from Taiwan, the transport charge is $4200.00 per container. Another is from Malaysia, the transport charge is $3200 per container, but the shipping date will be much longer than from Taiwan.

Please check the price, if it's ok, please let me know.

Best regards,

***

Explanation:
Company L offers to ship containers to the United States via Taiwan or Malaysia. Although not explicitly stated in this email, the motive for shipping through a third country is to avoid paying duties.
Company M
Product: Steel wire garment hangers
Country of origin: China
Means to evade duties: Illegal transshipment

From: ***
Sent: Friday, April 09, 2010 9:27 PM
To: ***
Subject: Re: RE: RE: Re: Re: Hanger Business

Yes, the tariff rate is high. However, we are not extinct because of it. We keep a solution for our friends. It is benefit for us and our client. Both have made profit from it.

We do not know how much profit you can make from working with wells. In China, yes, wells' tariff rate is the lowest in China. It is about 16%. He is the only one company for the first rank. Our factory is of the second rank. However, we still alive. "Fact speaks louder." Our clients also make profit working with us.

For this kind of client, we usually ship via another country, through which you only need to pay about 3.5% or lower rate. So for this, usually, CIF, DDU or DDP is suitable for you.

If you do not know it properly, we can do DDP for you. That is, door to door service. Its procedure is very easy for you, just like we send a package through courier. Through it, we will send the hangers directly to your warehouse. In a word, it will save you much energy, and most important, a lot of money.

A trial order may make you know much about us.

We look forward to your reply, and hope we can cooperate with each in the near future.

***

Explanation:
Company M offers to illegally ship product through a third country to avoid paying duties. As stated by Company M, this service is offered to “our friends” and that illegal transshipment “is a benefit for us and our client.”
Steel Grating from China

(DOC Case Nos. A-570-947 and C-570-948)

Steel grating (commonly referred to as bar grating), consists of two or more pieces of steel, including load-bearing pieces and cross pieces, joined by any assembly process, regardless of: (1) size or shape; (2) method of manufacture; (3) metallurgy (carbon, alloy, or stainless); (4) the profile of pieces; and (5) whether or not they are galvanized, painted, coated, clad or plated. Excluded from the scope are expanded metal grating, which is a single sheet or thin plate that has been slit and pulled; and safety plank grating, which is a single sheet or this plate that has been pierced or cold formed.

Steel grating is designed to support and distribute the weight of objects. Common end uses include walkways, mezzanines, catwalks, fire escapes, stairways, and flooring.

Industry at a Glance:
- Subject to AD/CVD orders since July 23, 2010 (DOC)
- Number of U.S. producers in 2009: 7
- U.S. producers’ U.S. shipments in 2009: $162 million
- U.S. employment of production and related workers in 2009: 518
- U.S. production locations: Alabama, Illinois, Indiana, Ohio, Oklahoma, Mississippi, Pennsylvania, Texas, Utah (USITCp, USITCq)

U.S. Production Locations of Steel Grating

Map source: http://www.coloringcastle.com
Companies Willing to Evade U.S. AD/CV Duties on Steel Grating

Company N is a Chinese steel grating producer. Below is an email provided to staff that documents the company's disregard for antidumping duty orders (highlighted in red).

Company N
Product: Steel grating
Country of origin: China
Means to evade duties: Illegal transshipment

From: ***
Sent: Mon, August 30, 2010 1:01 AM
Subject: ***

Below is the result of your feedback form. It was submitted by () on Monday, August 30, 2010 at 01:01:13

Name: ***
Company: ***
Address: ***
City: Ningbo
State: Zhejiang
ZIP: 315195
Country: China
Phone: ***
Email: ***
Comments: Dear Sir,

If you need the best steel grating with low-cost, why not contact us directly here?

FYI, Antidumping duty is no problem for us.

Submit: Send!
Part II:
Foreign Logistics Companies Willing to Evade U.S. AD/CV Duties
Foreign Companies Willing to Evade U.S. AD/CV Duties

The following foreign logistics companies publically advertise services to avoid paying AD/CV duties and other import restrictions like import quotas. These firms advertise their services in both English and Chinese on websites like alibaba.com, China’s largest e-commerce website that links buyers and sellers. Most evasion schemes involve illegal transshipment through a third country and falsified country of origin certificates for Chinese-origin product destined to the United States and other export markets. Many firms work with factories located in third countries to obtain authentic country of origin certificates for Chinese-origin product.

**Everysky International Forwarding Agency**

| Address: | No. 455, Zhong Shan East Road, Ningbo, Zhejiang, China, 315400 Tel: +(86) 0574 2790 3558 |
| Company representative: | Mr. Zhao Hui Customer service representative: Mr. Cheng Tel: +(86) 0574 2787 9775 Email: jeffningbo@163.com |
| Other info: | Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Prepares false country of origin certificates for Indonesia and Malaysia. Principal transit ports are Singapore and Port Klang, Malaysia. |

**H&T International Logistics Ningbo Ltd.**

(subsidiary of Hualianton International Logistics Co., Ltd.)

| Address: | Room 10-1, Yinyi Time Square, No. 8, Lengjing Street, Haishu District, Ningbo, China Tel: +(86) 574 8785 2330 |
| Other info: | Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Prepares and provides false country of origin certificates and re-exports products through Port Klang, Malaysia. Company stipulates that domestic (Chinese) exporters must reach an understanding with the foreign importers regarding export documents (i.e. falsified country of origin certificates) and payment terms. Products illegally transshipped include fasteners, steel pipe, steel wire rope, steel wire hangers, aluminum products, clothing, shoes, candles, bearings, and citric acid. |
Foreign Companies Willing to Evade U.S. AD/CV Duties (cont’d)

### Ningbo Star International Freight Forwarding Co., Ltd

**Address:**

Also known as:
- Ningbo Richstar Freight Forwarding Agent Co., Ltd.
- High Storm International Freight Forwarding Co., Ltd.
- Win-Win International Freight Forwarding Co., Ltd.

Sharp Gate Street, Ningbo City, Zhejiang Province, No. 58, City Renhe Center, 16-1, China
Tel: +(86) 0574 8768 6088

**Web:**

- [http://www.richstarfreight.com](http://www.richstarfreight.com)
- [http://www.sweiphone.eb80.com](http://www.sweiphone.eb80.com)

**Other info:**

Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Company uses different names when advertising transshipment services. Obtains authentic country of origin certificates from foreign factories despite product being of Chinese origin. Ships product from the Chinese ports of Dalian, Tianjin, Qingdao, Ningbo, Xiamen, and Shenzhen to Port Klang, Malaysia.

**Illegal export procedures:**

1. Company’s Malaysian branch acts as consignee in Malaysia. Removes first leg transportation manifest from China.
2. After cargo leaves China, customers provide copy of release of export documentation (e.g., first leg transportation, packing list, and invoice).
3. Malaysian branch in charge of procedures for changing containers and arranging booking for second leg transportation.
4. Before departure, Malaysia factories apply for certificates of origin for use for shipment of Chinese origin.

### Pulinktrans China, Ltd.

**Address:**

Room 206, Goldenland Building, No. 773 Siping Road, Shanghai, China, 200092
Tel: +(86) 21 6107 6102

**Web:**


**Other info:**

Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Provides authentic third-country country of origin certificates to clients, and can provide official authentication (by foreign country embassy) and notarized inspection report. Reportedly has cooperated closely with Ministries of Trade and Industry and Chambers of Commerce in Singapore, Malaysia, Indonesia, Thailand, Hong Kong, and the United Arab Emirates. Ports include Shanghai, Ningbo, Qingdao, Tianjin, Zhanpu, Wenzhou, Shenzhen, and Hong Kong. Transshipment hubs include Malaysia and Thailand. Products illegally transshipped include fasteners, steel pipes, steel wire hangers, and clothing.
### Foreign Companies Willing to Evade U.S. AD/CV Duties (cont’d)

#### Shenzen Sunpower International Logistics, Ltd.

| Address              | Room 2207, Gonglu Building, Block C, Yitai Centre, Dongmembai Road, Luohu District, Shenzhen, China, 518003  
|                      | Tel: +(86) 0755 2519 1363  
|                      | Email: sunpower@szsuperior.com  
| Other info           | Company based in Shenzhen, China, but headquartered in Ipoh, Malaysia. Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Provides various country of origin certificates depending on degree of customs inspection, production subject to AD/CV duties, and country of destination. Third-country certificates of origin provided include Taiwan, Malaysia, Indonesia, Bangladesh, Thailand, Vietnam, and Sri Lanka. All certificates of origin are provided by in-country factories. Company provides all documentation, customs declarations, factory inspection, and other relevant procedures. |

#### Wintrans Logistics and Investment & Management Co., Ltd

| Addresses            | Room 26A-D, Ocean Building, 268 Lujian Road, Xiamen, Fujian, China  
|                      | Tel: +(86) 592 806 5305  
|                      | Email: info@wintrans.com.cm  
| Shenzhen Wintrans Logistics Co., Ltd. |  
|                      | Luohu District, Shenzhen City, Pacific Business Building, B1402, Shenzhen, Guangdong, China  
| Shanghai Wintrans Branch |  
|                      | Siping Road, 188 2108, Shanghai China  
|                      | [http://cn.made-in-china.com/showroom/wintransalice/companyinfo/%E5%8E%A6%E9%97%A8%E9%80%9A%E6%B4%B2%E7%89%A9%E6%B5%81%E6%8A%A9%E8%B5%84%E7%AE%A1%E7%90%86%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8.html](http://cn.made-in-china.com/showroom/wintransalice/companyinfo/%E5%8E%A6%E9%97%A8%E9%80%9A%E6%B4%B2%E7%89%A9%E6%B5%81%E6%8A%A9%E8%B5%84%E7%AE%A1%E7%90%86%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8.html)  
| Other info           | Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Claims to work with business partners in Indonesia, Myanmar, and Malaysia that provide certificates of origin issued by factories located in those countries. Directs payment through Malaysia or Hong Kong. Products include steel pipes, apparel, shoes, ceramics, and furniture. Export markets include the United States, Canada, Mexico, Turkey, and Latin America. |
### Foreign Companies Willing to Evade U.S. AD/CV Duties (cont’d)

**Gateway Container Line Co., Ltd.**

| Addresses: | Gateway Container Line Co., Ltd. (Qingdao)  
B-1022, Yu Yuan Mansion, No. 75 West Hong Kong Road, Qingdao, China, 266071  
Tel: +(86) 532 8197 8801  
  
Gateway Container Line Co., Ltd. (Tianjin)  
Room 2602, Twain building, Hanghua Plaza, Dagunan Road, Hexi District, Tianjin, China, 300000  
  
Gateway Container Line Co., Ltd. (Shanghai)  
Room 2201, No. 1, Alley 258, Dongbaoxing Road, Shanghai, China, 200080  
Tel: +(86) 21 6356 0173  
Room 612, Hesen Building, No. 1600 Yan’an Road (W), Shanghai, China, 200052  
Tel: +(86) 21 5258 5515  
  
Gateway Container Line Co., Ltd. (Ningbo)  
19 Floor, Unit B, Century Square, No. 118 Daliang Street, Ningbo, China, 315000  
Tel: +(86) 574 8717 5858  
  
Gateway Container Line Co., Ltd. (Shenzhen)  
Room 1705, Building A, Huaguoshan Building, South Garden Road, Shekou, Shenzhen, China, 518067  
Tel: +(86) 755 2680 5586  


| Other info: | Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Claims to provide services to both domestic (Chinese) exporters and foreign importers. |
Foreign Companies Willing to Evade U.S. AD/CV Duties (cont’d)

Global Success International Transportation (Shenzhen) Ltd.

Address: 18F, Overseas Friendship Building, No. 12, Ying Chun Road, Luohu, Shenzhen, China, 510800
+(86) 755 8214 5368
Email: info@globalsourcing.com.cn

http://www.ecplaza.net/tradeleads/seller/5605380/transhipment_project.html

Registration no: Certified by China’s Ministry of Commerce as a licensed non-vessel operating common carrier (NVOCC) (NVOCC#MOCNV 01254).

Other info: Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Transshipment hubs include Malaysia, Singapore, Indonesia, Bangladesh, the Philippines, and India. Third-country certificates of origin are issued for Chinese-origin product. Provides illegal transshipment services for the following products subject to U.S. AD/CVD orders: fasteners, threaded rod, steel hangers, locks, and wooden bedroom furniture. Also provides transshipment services for products subject to AD/CV duties in Europe, South America, and Turkey.

Dyna International Shipping Ltd.

Address: Room 01-02, 16/F, Ginza International Building, Shennan Road, Shenzhen, Guangdong, China
Tel: +(86) 755 2151 7557
Email: Shenzhen@dynaprc.com

Other offices located in: Hong Kong, Guangzhou, Shanghai, Beihai, Huangpu, Nanhai, Foshan, Zhongshan, Wuhan, Kunming, Ningbo

http://www.hardware-wholesale.com/d-p115413722755560100-service_to_avoid_the_anti_dump_tax_import_from_china/

Other info: Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Transshipment hubs include Malaysia, Singapore, Thailand, and Indonesia with third-country certificates of origin. Advertises illegal transshipment services for Chinese products subject to AD/CV duties in the United States, Mexico, Colombia, Egypt, Turkey, and Europe.
### Foreign Companies Willing to Evade U.S. AD/CV Duties (cont’d)

**Hanhen Shipping (China) Co., Ltd.**

<table>
<thead>
<tr>
<th>Address</th>
<th>A-1109, Jintian Building, Heping Road, Luohu, Shenzhen, China Tel: +(86) 0755 2556 5280</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identification no:</td>
<td>China Tax ID: 440300769195249 United Nations Procurement Division Vendor ID: 09D00065 (Logistic Supplier)</td>
</tr>
<tr>
<td>Other info:</td>
<td>Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Transshipment hubs include Singapore and Dubai. Country of origin certificates from Malaysia, Vietnam, Indonesia, and Bangladesh are issued for Chinese-origin products subject to AD/CVD orders. Advertises illegal transshipment services on the website of the Embassy of China in Canada.</td>
</tr>
</tbody>
</table>

**Suzhou Yuncheng Ex/Im Co., Ltd.**

<table>
<thead>
<tr>
<th>Address</th>
<th>No. 8-7 Shop, Shuixiang West Road, Meili Street, Songling Town, Wujiang, Jiangsu, China, 215200</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company representative:</td>
<td>Mr. Yucheng Zhou</td>
</tr>
<tr>
<td>Business registration no.:</td>
<td>320584000113121</td>
</tr>
<tr>
<td>Issuing authority:</td>
<td>Suzhou City Wujiang Administration for Industry and Commerce</td>
</tr>
<tr>
<td>Issue date:</td>
<td>10/18/2007</td>
</tr>
<tr>
<td>Expiration date:</td>
<td>10/17/2017</td>
</tr>
<tr>
<td>Registered capital:</td>
<td>RMB 3,000,000</td>
</tr>
<tr>
<td>Other info:</td>
<td>Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Advertises illegal transshipment services for seamless steel pipe and carbon steel fasteners, among other products.</td>
</tr>
</tbody>
</table>
Foreign Companies Willing to Evade U.S. AD/CV Duties (cont’d)

**L’Assurex International Logistic Ltd.**

<table>
<thead>
<tr>
<th>Address:</th>
<th>Room 1207, Logistics Center, No. 1, Haitian Road, Huli, Xiamen, Fujian, China, 361000</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company representative:</td>
<td>Mr. Liming Zheng</td>
</tr>
<tr>
<td>Registration no.:</td>
<td>350200200006505</td>
</tr>
<tr>
<td>Issuing authority:</td>
<td>Xiamen City Administration for Industry and Commerce</td>
</tr>
<tr>
<td>Issue date:</td>
<td>10/11/2007</td>
</tr>
<tr>
<td>Expiration date:</td>
<td>10/10/2027</td>
</tr>
<tr>
<td>Registered capital:</td>
<td>RMB 10,000,000</td>
</tr>
<tr>
<td>Other info:</td>
<td>Advertises illegal transshipment services on alibaba.com to avoid paying AD/CV duties and other import restrictions. Provides certificates of origin from Malaysia, Indonesia, and India for Chinese-origin product. Export markets include the United States, Venezuela, Brazil, Argentina, Europe, Jordan, Egypt.</td>
</tr>
</tbody>
</table>
Part III: Examples of Companies Advertising Illegal Transshipment Services on the Internet
Dear Sirs/Madams,

I am writing to introduce you to Hanbao Shipping Company, which is based in Shanghai on the east coast of China. We have taken the liberty of sending you details from our website and have made contact with a view to our respective organizations doing business together.

About Hanbao Shipping Company -- http://www.hanbao.com

Our company has many years’ experience in handling FCL/CLL/RAIL & ROAD shipments. We provide a wide range of shipping services, including arranging local contact with the shipping companies (COSCO, CMA-CGM, Evergreen, NEL Lines, JTL, among others) and shipping documentation and customs clearance services. Especially we have a great advantage in rail transport from China to Russia/Middle East and large engineering machinery transport. We operate according to international law and the laws of the Republic of China.

Key services:

- We enjoy long-term relationships with all of the main shipping lines and airlines. As your shipping and trading agent, we can offer:
- Competitive freight rates and reliable service to and from main locations
- Rail transport from Tianjin/Shanghai to Nanking/Shenzhen to Russia/Middle East, etc.
- Industrial Projects Handling/Large Engineering Machine Transport (such as crane, heavy equipment, etc.)
- Sea/Import/Export Services/FCL/CLL Consolidation
- Air Freight Service
- Third-Party Logistics
- Dangerous Cargo Handling
- Transshipment from China to Malaysia then to USA direct, to avoid quotas and provide C/O of Malaysia
- Handling of documents and cargos for FOB to CIF transactions, including switch MBL and BL
- Assistance in applications for Certificates of Origin, Forms A, Legislatures of Derr, B/C, SGS, etc.

As per instructions:

- Destination
- Domestic delivery (Guangdong, China, India, Europe)
- Warehousing consolidation services
- 1. Receive cargo from more than one suppliers and loading container
- 2. Our warehouse can be used as your storage center, you can pick some cargo first, and sell them to your buyers in China
- We have several offices in the India and other different countries of Asia
- If you need any further information, please kindly feel free to contact us. And I’m sorry if any inconvenience that caused by this e-mail.

Best Regards!

Hanbao Shipping (China) Co., Ltd.
1109, Jordan Building, Jing Road,
Luoxiang, Hebei, China
Tel: +852 25196280
Fax: +852 25196138
Cell: +852 138571486
Skype: kenthanhong
Mac: kent.hanbao.com
Email: kent@hanbao.com
http://www.hanbao.com
A trusted name in JPL supply in Asia

Related Articles:

- (none)
According to traders' demands in commercial interests and import tariff reduction, we provide switch for triangular trade, changing the COs, in order to protect the interests of traders and save tariff expenses.

1. Based on the principle of commercial confidentiality, we HANHEN work seriously as an intermediate part between processing manufacturers, traders and end-buyers and switch documents reasonably.

2. We use Singapore, Dubai to offer entrepot trade service and issue CO of Malaysia, Vietnam, Indonesia, Bangladesh in order to avoid tariff barriers.

transshipment, the best way to avoid anti-dumping

Other products of Shanghai TongHang Co., Ltd.:

<table>
<thead>
<tr>
<th>Product Name</th>
<th>Material</th>
<th>Color</th>
<th>Size</th>
<th>Price</th>
<th>MOQ</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wooden Table</td>
<td>Solid Oak</td>
<td>Natural</td>
<td>1.5m x 1m</td>
<td>$200</td>
<td>100</td>
</tr>
<tr>
<td>Wooden Chair</td>
<td>Solid Oak</td>
<td>Espresso</td>
<td>Set of 4</td>
<td>$100</td>
<td>50</td>
</tr>
</tbody>
</table>

Specifications:

- Product Material: Solid Wood
- Color Options: Natural, Black, Espresso
- Sizes Available: 1.5m x 1m, 1m x 1m
- Payment Terms: 50% Advance, Balance at Delivery
- Delivery Time: 4-6 Weeks

Interested in purchasing? Contact us today for a quote on our products at thebestway@tonghang.com.
Service to Avoid the Anti-Dump Tax Import from China

We are China dyna international freight forwarding company. We do the Ocean FCL & LCL, air service & train service ex-China ports to worldwide ports and any destination. You needn't concern about the anti-dumping tax or high duty import from China. We provide this kind of service to avoid the anti-dumping tax. To trans-ship from Malaysia/Singapore/Thailand/Indonesia with GC. (SL, Packing list, Invoice, CO, form A).

1. Service to avoid this anti-dump tax import shoes from China to Europe/Mexico/USA.
2. Service to avoid this anti-dump tax import garment from China to Europe/Mexico/USA/Columbia.
3. Service to avoid this anti-dump tax import Door Locks from China to Egypt/South America.
4. Service to avoid this anti-dump tax import metal Silicon from China to Europe.
5. Service to avoid this anti-dump tax import metal valve from China to Mexico.
6. Service to avoid this anti-dump tax import ceramic tile&PVC from China to Turkey/Egypt.
7. Service to avoid this anti-dump tax import tile fittings from China to Europe.
8. Service to avoid this anti-dump tax import Energy-saving lighting from China to Europe.

Please do not hesitate to contact us if you need this kind of service.

Bill of Lading Forms [www.JJKalter.com]
Comply with DOT & EPA Regs: Hazmat, Straight
Bill of Lading & Supplies

Freight Forwarding [www.FreightForward.com]
Reliability, Service, Low Prices Across the Globe
- Air, Land, & Sea

Freight Forwarding [myFreight.com]
Use our free freight service quotes and compare
dozens of companies.

Free Sourcing White Paper [www.traideart.com]
10 ways to counter rising costs of labor and materials overseas

Entrepot Logistics Shanghai

About Us

We provide via 3rd country bonded area logistics with CO, FORM A to evade anti-dumping duties in your country. MSN entrepotlogistics (at) hotmail.com

Transshipment is the best way to evade anti-dumping. Now, more and more countries are restricting or anti-dumping import. Made in China products, especially Turkey and Mexico are restricting the fabrics which made in china is the severest. The transshipment is the only way to avoid it.

We can help you to avoid ant-dumping if ... Read More

Company Profile

- Company Name: Entrepot Logistics Shanghai
- Country/Territory: China
- Business Type: Others
- Registration Date: 2010/04/01 (Year/Month/Date)
- Buyer / Seller in EC21: Both
- Keyword: fabrics, laminate floor, yams, polyester

Industrial Supplies Industrial Distribution Group available on-line and in stock! www.igp-cors.com
Contract Manufacturer SMT, Through-Hole, Mixed, RoHS, 50 years experience. Service focus. www.contractor.com

Generated by ACA HTML Converter Trial Version

Source: http://united5.en.ec21.com
Transshipment, Help You Avoid Anti-Dumping Duties

Posted Wed, 08/11/2010 - 02:31 by admin
Expires: 09/11/2011

Company: EVERSKEY INTERNATIONAL FORWARDING AGENCY CO., LTD

Website: http://www.re-export.net

Description:
Are you looking for a way to avoid antidumping? Transshipment may be the best way of present.
Now we will show you how it helps you to avoid anti-dumping and how it reduces your cost.

As we know, your country doesn’t charge high tariffs for all the country but China. Now we can help you to provide the documents to your government certifying that the products are made of other low tariff countries instead of China.

How can we do it?
1st: We need to export those products (made in China) to other country (just as Malaysia). It’s easy for us to do it and which just need cost your little money.
2nd: We will finish custom clearance for those cargos in Malaysia and then send it to our warehouse. Picking up those to re-load it to the new container (booking with Malaysia).
3rd: Finding a local factory to provide all the original documents to your country. And then export the products to your instruction Port.

After the operation of above, the original will be changed from China to Malaysia. You just need to pay the normal import duty.

We are experienced in it for many years, and we are confident that we have the ability to help you to lower the import tariff. You are welcomed to contact us if you are fond of our service.

Tags: transshipment, freight forwarder, sea freight, air freight, avoid anti-dumping

Source: http://nuideal.com/-selling-lead/transshipment帮助你避免反倾销关税
Branch introduced

Our Business:

Best tailor made sea, air, land and multimodal shipping solutions for clients, issue authorized Bill of Lading.

Full Export Business:

Take the advantage of preferential contracts with NIKKO, CSCL and COSCO, we’re able to provide requested cabinet space during peak seasons as well as long term stable price for Europe Lines to ports Hamburg, Felixstowe, Rotterdam and Antwerp.

For Middle East Persian Gulf lines to ports Dubai, Abu Dhabi, Al Abbas, Bahrain, Oman, Doha, Kuwait and Muscat. Simultaneously, we also offered competitive rates.

Bulk Cargo Export Business:

Being export large machinery and auto in the manner of bulk cargo for long time, we’ve built up close relations with bulk carrier companies and bulk cargo ports.

Import Business:

Depend on a professional team, we have been offering flawless import distribution services for years. Customers worldwide are now able to trace their cargos on ships via our website. Our client-oriented employees are available for any queries even during national holidays.

Air Cargo Business:

Our competitive rate and services is to Southeast Asia, Australia and Europe.

Special Services: Third Country Transshipment

The fact that import tax for same product varies in Customs of different countries makes reasonably avoid anti-dumping possible. Since we are founded, count on our reliable official intelligence and mature experience, we have been providing One-Stop Third Country Transshipment logistic service for domestic exporters and foreign importers, effectively helped our clients lower the cost, increase the profit and the competitiveness.
TRANSHIPMENT PROJECT TO AVOID ANTI-DUMPING TAX

In order to save the anti-dumping tax when import the goods from China, here we would like to provide the service to China shippers and oversea consignees to arrange their goods via the third countries, part this can be in Malaysia, Singapore, Indonesia, Bangladesh, Philippines, India, etc. and issue the third country document to ship the goods to the final destination country.

A. anti-dumping goods export from China to USA
   1. fastener: thread rod, screw, fungus, screw, hexagon bolt, wood furniture, etc.
   2. anti-dumping goods export from China to Europe
   3. fastener: thread rod, leather shoes, suitcase and energy saving lamp, etc.
   4. anti-dumping goods export from China to South America
   5. fastener: pan head, hexagon bolt, etc.
   6. anti-dumping goods export from China to Turkey
   7. living board, garment, shoe, tile, ceramic, etc.
   8. other anti-dumping goods, just keep us informed

If you require further details, please let us know below information, then we will provide our best project for the routine way and advice for your choosing.

Contact us:

Ms. ANNA LEE

Contact Now

Company: Globe Success International Transportation (Shenzhen) LTD
Address: No.12, Overseas Friendship Building, 12F, Yingshan Road, Luohu, Shenzhen, Guangdong, China
Website: http://www.ecplaza.net
E-mail: info@ecplaza.net
Tel: 0086-755-8230-7502
Fax: 0086-755-8230-7591
Mobile: 133-0755-8230

Download this page to PDF/Email:

Printable HTML/Text Version:

Source: http://www.ecplaza.net/tradeleads/seller/5605380/transhipment_project.html
Pulinktrans China Ltd.

Our service: Avoid antidumping transshipment; Customs clearance in Russia.

1. Sea, air, rail transportation, import and export booking, customs clearance, warehousing, storage and other traditional services.

2. To circumvent anti-dumping, a third country of transit transport, while providing many products such as certificates of origin and embassy endorsement.

3. To provide Russia... [Click for Details]

Member Info

Business Type: Service, Agent, Other
Number of Employees: 5 ~ 56
Business Scope: Services
Member Since: 2009
Last Sign In Date: 2010-09-29

Product List

<table>
<thead>
<tr>
<th>Product Name</th>
<th>Update Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Export Via A-Third-Country Against The Anti-Dumping Policy</td>
<td>2010-07-05</td>
</tr>
<tr>
<td>Customs Clearance in Russia or Ukraine</td>
<td>2010-01-18</td>
</tr>
</tbody>
</table>

Related Category: Service > Commercial Service

Contact Details

Company Name: Pulinktrans China Ltd.
Company Address: Room 205, Goldenland Building, No. 773 Siping Rd, Shanghai, P. R. China
City/Town: Shanghai
Province/State: Shanghai
Country/Region: China
ZIP/Postal Code: 200092

Phone Number: Please sign in to view contact details
Fax Number: Please sign in to view contact details
Homepage: Please sign in to view contact details
Mobile:
Contact Person (Department): Mr. Zhang (Re-Export Department)

Contact Now

Disclaimer

Source: http://www.made-in-china.com/showroom/realsh
Shanghai Wintrans Branch

We are a professional forwarder who can provide this escrow services via Malaysia or Indonesia.

This will help you to evade high anti-dumping duties and anti-subsidies at your country, so that we may have chance to re-establish our business.

The general procedure can be operate as below steps:
1. Transport from China ports to Malaysia, Port Klang / Singapore
2. Transport from ... (Click for details)

Member Info
Business Type: Trade, Service
Number of Employees: 5 - 50
Business Scope: Transportation
Member Since: 2010
Last Sign in Date: 2010-04-21

Contact Details

Company Name: Shanghai Wintrans Branch
Company Address: Siping Road 188 2108, Shanghai, China
City/Town: Shanghai
Province/State: Shanghai
Country/Region: China
Zip/Postal Code:

Phone Number:
Fax Number:
Homepage: Please sign in to view contact details
Mobile:
Contact Person:
(Department): Mr. Henry

For Buyers:
Search China Products / Suppliers / Manufacturers
Post Offer to Buy
Quick Products
Search & Index

For China Manufacturers and Suppliers:
Add your Products
Search Buyers
Promotion - Spotlight Exhibits
Recommended Products

For Global Manufacturers and Suppliers:
Post Offer to Sell
Recommended Offers

Source: http://www.made-in-china.com/showroom/1987126
References


USITCe. Light-Walled Rectangular Pipe and Tube from Turkey. Inv. No. 731-TA-1121 (Final), May 2008.


USITCi. Natural Bristle Paint Brushes from China. Inv. No. 731-TA-244 (Second Review), November 2004.


References
