

Section 301 Investigation: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation - Form for Public Comment

When submitting comments using this form, enter the specified information in the following fields and explain the basis and rationale for your statements. To the extent that you provide specific data or estimates, please include in the same field the citation to the source of the data or estimate. Please select "N/A" if the field does not apply. You may submit additional materials, if necessary, as a separate attachment. For further details about submission and handling of business confidential information, please refer to Section G of the Federal Register Notice.

- 1. Indicate whether the comment contains business confidential information (BCI), is a public document, or is a public version of a BCI document.**

Public Document

- 2. Please state your position on the imposition of duties:**

Support

- 3. 8-digit HTSUS item numbers* for all products you wish to address in this comment:**

*Use numerical characters only but separate distinct 8-digit HTSUS item numbers by commas.

Please see Attachment 1 to the attached letter.

- 4. Description of product(s) of concern:**

Carbon, stainless, and other alloy steel wire and wire products.

- 5. Submitter Information**

Submitter Name: John T. Johnson, Jr.

(Note: If you are submitting on behalf of an organization, complete the following two fields.)

Submitter Representative: Frederick P. Waite, Esq., Vorys, Sater, Seymour and Pease LLP

Organization Name: American Wire Producers Association ("AWPA")

- 6. Commenter's relationship to the product:** Industry Association

- 7. Does this comment in regulations.gov include additional attachments?**

YES

- 8. Please indicate whether any additional attachment contains business confidential information (BCI), is a public document, or is a public version of a BCI document.**

Public Document

9. Please provide a concise summary of the basis or rationale for your comment:

These wire and wire products are value-added products which China has promoted through illegal export tax, VAT, subsidy, and currency manipulation schemes. As a result, U.S. imports of these products have surged at the expense of American companies and workers that make these products in the United States.

10. Please provide any additional comments:

Please see the letter and attachments submitted by the AWWA.



American Wire Producers Association

PO Box 151387
Alexandria, VA 22315

May 11, 2018

SECTION 301 (CHINA)
DOCKET NO. USTR-2018-0005

PUBLIC SUBMISSION

VIA ELECTRONIC SUBMISSION ([HTTP://WWW.REGULATIONS.GOV](http://www.regulations.gov))

Ambassador Robert E. Lighthizer
United States Trade Representative
Office of the United States Trade Representative
600 Seventeenth Street, NW
Washington, DC 20508

Attention: Chairman William L. Busis
Section 301 Committee
Office of the United States Trade Representative

Re: *Comments on Proposed Action in Connection with USTR's Section 301 Determination regarding China's Acts, Policies, and Practices related to Technology Transfer, Intellectual Property, and Innovation (Docket Number USTR-2018-0005)*

Dear Ambassador Lighthizer:

On behalf of the American Wire Producers Association ("AWPA"), we respectfully submit the following comments in response to the notice of the United States Trade Representative ("USTR") regarding the proposed action in connection with its Section 301 finding that "acts, policies and practices of the Government of China related to technology transfer, intellectual property, and innovation . . . are unreasonable or discriminatory and burden or restrict U.S. Commerce."¹

¹ *Notice of Determination and Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 14,906 (April 6, 2018) (hereinafter "Notice") at 14,906.

W I R E I S E V E R Y W H E R E

office 703.299.4434 / email info@awpa.org / **www.awpa.org**

Further to the Section 301 determination regarding China, the USTR has proposed an additional tariff of 25 percent *ad valorem* on imports of specific products from China which are listed in the Annex to the *Notice*. These products are identified by their eight-digit subheadings in the *Harmonized Tariff Schedule of the United States* (“HTSUS”).²

The AWPAs represent 41 independent producers of carbon, stainless, and other steel wire and wire products as well as five integrated wire rod mills that also manufacture such downstream wire and wire products. On their behalf and on behalf of their workers and communities throughout the United States, the AWPAs respectfully urge the USTR to add the steel wire and wire products identified in Attachment 1 hereto to the list of imported products from China which may be subject to the proposed additional tariff of 25 percent.³

The AWPAs note that additional duties on these wire and wire products from China are unlikely to cause disruptions to the U.S. economy because there is more than sufficient capacity in the U.S. wire and wire products industry to meet domestic demand.⁴ Such additional duties would also have the “lowest consumer impact” since U.S. consumers can meet their requirements from American-based sources rather than from other foreign suppliers.⁵

² *See id.*

³ *See id.* at 14,908.

⁴ *See id.* at 14,907.

⁵ *See id.*

Consequently, additional duties on these wire and wire products from China would NOT cause “disproportionate economic harm to U.S. interests.”⁶

Further, these proposed wire and wire products are value-added products that China has promoted through mercantilist export tax and value added tax rebate schemes, subsidy programs, and currency manipulation.⁷ In numerous reports to the U.S. Congress, the USTR noted that China’s illegal trade practices have encouraged the exportation of certain finished products—“particularly wire products”—while discouraging the exportation of semifinished products and raw materials.⁸ Consequently, aided by such schemes, imports of Chinese steel wire and wire products have surged into the United States in recent years.⁹ Accordingly, it is appropriate to add these products to the list of imported products from China which may be subject to the proposed additional tariff of 25 percent.

⁶ *See id.* at 14,908.

⁷ *See* Attachment 2 at 1–2.

⁸ *See, e.g., United States Trade Representative, 2017 Report to Congress On China’s WTO Compliance* (January 2018) at 46. *See also* Attachment 2 at 7–15.

⁹ *See id.* at Exhibit 1.

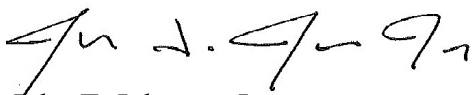
AMBASSADOR ROBERT E. LIGHTHIZER
UNITED STATES TRADE REPRESENTATIVE
OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE
May 11, 2018
Page 4

SECTION 301 (CHINA)
DOCKET NO. USTR-2018-0005

PUBLIC SUBMISSION

These comments are timely submitted.¹⁰

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Johnson, Jr.", written in a cursive style.

John T. Johnson, Jr.
AWPA President
President, MID-SOUTH WIRE

Attachments

¹⁰ *Id.* at 14,906.

ATTACHMENT 1

ANNUAL U.S. IMPORTS FROM CHINA
OF
CARBON, STAINLESS, AND OTHER ALLOY STEEL WIRE AND WIRE PRODUCTS
(INCLUDING STEEL WIRE ROPE AND STRAND, STEEL WIRE SPRINGS,
WOVEN WIRE FABRIC, WIRE GRILL, NETTING AND FENCING,
NAILS AND OTHER FASTENERS, INDUSTRIAL FASTENERS, CHAINS,
AND OTHER STEEL WIRE PRODUCTS)
BY *HARMONIZED TARIFF SCHEDULE OF THE UNITED STATES (“HTSUS”)*
CLASSIFICATION

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

AMERICAN WIRE PRODUCERS ASSOCIATION
COMMENTS ON PROPOSED ACTION IN CONNECTION WITH USTR’S SECTION 301 DETERMINATION
REGARDING CHINA’S ACTS, POLICIES, AND PRACTICES RELATED TO TECHNOLOGY TRANSFER,
INTELLECTUAL PROPERTY, AND INNOVATION
(DOCKET NUMBER USTR-2018-0005)

MAY 11, 2018

AMERICAN WIRE PRODUCERS ASSOCIATION

Annual Imports from China

Volume in Metric Tons, Value in US Dollars

WIRE	2015		2016		2017	
HTS code	Volume	Value	Volume	Value	Volume	Value

CARBON WIRE

72171010	195	\$240,737	75	\$133,525	58	\$48,261
72171020	245	\$383,802	67	\$108,243	26	\$28,792
72171030	87	\$134,201	338	\$252,301	157	\$209,727
72171040	6,050	\$3,995,717	6,151	\$3,462,022	4,699	\$3,314,949
72171050	337	\$606,738	393	\$495,560	1,368	\$1,463,205
72171060	3,202	\$4,150,007	3,454	\$3,015,909	779	\$836,076
72171070	23,537	\$15,656,615	21,055	\$12,544,186	16,089	\$12,153,699
72171080	24,853	\$26,674,837	20,744	\$16,833,863	11,074	\$8,071,548
72171090	512	\$995,286	440	\$1,180,950	195	\$1,113,493
72171100	400	\$537,777	331	\$438,950	464	\$687,913
72171110	2,047	\$1,388,455	2,087	\$1,650,601	1,410	\$1,045,125
72171120	590	\$490,999	505	\$395,802	308	\$298,011
72171130	514	\$630,134	1,355	\$1,326,543	970	\$955,836
72171080	15,993	\$15,180,506	15,100	\$13,178,170	10,896	\$11,281,461
72171090	2,272	\$1,799,918	1,660	\$1,107,284	759	\$591,401
72172015	465	\$486,301	2,302	\$2,539,233	2,906	\$3,360,676
72172030	34,558	\$24,244,363	29,441	\$17,159,439	22,552	\$15,857,031
72172045	23,728	\$21,506,042	27,576	\$21,397,473	22,051	\$20,851,936
72172060	68	\$104,019	20	\$72,456	56	\$118,332
72172075	2,465	\$2,524,629	1,225	\$1,499,979	922	\$1,106,723
72173015	403	\$412,900	86	\$113,645	867	\$879,467
72173030	1,146	\$1,220,029	423	\$608,777	171	\$334,436
72173045	7,445	\$8,738,059	5,758	\$6,778,422	6,611	\$8,776,556
72173060	0	\$0	0	\$0	4	\$24,468
72173075	5,654	\$4,595,868	363	\$498,061	498	\$846,212
72179010	1,786	\$3,066,502	2,199	\$3,137,347	4,213	\$4,763,781
72179050	1,208	\$2,441,137	1,341	\$2,120,174	995	\$2,089,617
SUB TOTAL	159,760	\$142,205,578	144,489	\$112,048,915	111,098	\$101,108,732

CARBON WIRE

AMERICAN WIRE PRODUCERS ASSOCIATION

Annual Imports from China

Volume in Metric Tons, Value in US Dollars

WIRE	2015		2016		2017	
HTS code	Volume	Value	Volume	Value	Volume	Value

STAINLESS WIRE

72230010	7,021	\$23,864,654	7,373	\$20,460,659	8,836	\$25,906,126
72230050	80	\$1,899,943	95	\$1,601,336	76	\$1,274,371
72230090	144	\$668,970	82	\$425,227	1,225	\$5,619,082
SUB TOTAL	7,245	\$26,433,567	7,550	\$22,487,222	10,137	\$32,799,579

STAINLESS WIRE**ALLOY WIRE**

72292000	22,031	\$22,951,390	27,070	\$27,518,194	28,218	\$31,638,343
72299005	288	\$458,999	325	\$601,797	458	\$491,719
72299010	18	\$51,387	21	\$212,611	13	\$289,426
72299050	6,595	\$7,779,797	24,093	\$15,231,177	12,543	\$9,491,947
72299090	1,779	\$2,680,672	1,187	\$1,647,100	487	\$688,442
SUB TOTAL	30,711	\$33,922,245	52,696	\$45,210,879	41,719	\$42,599,877

ALLOY WIRE

TOTAL ALL WIRE	2015		2016		2017	
	Volume	Value	Volume	Value	Volume	Value
	197,716	\$202,561,390	204,735	\$179,747,016	162,954	\$176,508,188

AMERICAN WIRE PRODUCERS ASSOCIATION

Annual Imports from China

Volume in Metric Tons, Value in US Dollars

WIRE PRODUCTS	2015		2016		2017	
	Volume	Value	Volume	Value	Volume	Value
ROPE & STRAND						
73121005	680	\$5,251,768	606	\$5,261,390	571	\$4,704,678
73121010	591	\$3,242,529	854	\$4,707,213	1,021	\$4,647,289
73121020	1,527	\$8,109,446	2,090	\$9,620,928	1,758	\$10,407,861
73121030	44,934	\$78,725,369	63,555	\$100,748,609	64,319	\$106,640,918
73121050	181	\$1,096,569	602	\$1,479,748	606	\$1,734,350
73121060	1,633	\$5,271,023	2,035	\$5,931,948	2,312	\$6,965,032
73121070	2,207	\$10,754,982	2,206	\$10,178,183	2,464	\$10,453,162
73121080	29	\$61,597	315	\$527,206	277	\$433,359
73121090	34,528	\$64,384,075	30,263	\$54,777,794	29,144	\$52,772,220
73129000	1,210	\$4,264,719	1,474	\$4,367,673	1,318	\$4,929,044
SUB TOTAL	87,520	\$181,162,077	104,000	\$197,600,692	103,790	\$203,687,913

ROPE & STRAND**BARBED WIRE**

73130000	3,035	\$2,841,274	3,636	\$2,857,928	3,391	\$3,098,088
----------	-------	-------------	-------	-------------	-------	-------------

CLOTH,GRILL,NETTING & FENCING

73141210	175	\$654,174	236	\$776,647	149	\$635,151
73141220	64	\$548,282	70	\$435,127	109	\$357,834
73141230	128	\$587,725	10	\$135,916	11	\$142,227
73141260	0	\$8,812	1	\$5,918	0	\$2,409
73141290	45	\$222,580	33	\$290,663	127	\$339,358
73141410	2,081	\$12,876,273	2,012	\$11,334,624	3,171	\$15,613,299
73141420	1,836	\$7,013,849	1,940	\$5,195,593	2,171	\$6,546,910
73141430	12	\$96,034	7	\$62,429	5	\$41,353
73141460	69	\$470,693	40	\$358,052	54	\$491,004
73141490	2,535	\$16,874,423	1,437	\$9,291,621	2,564	\$15,331,076
73141901	15,029	\$19,306,031	8,147	\$12,855,045	7,842	\$11,325,463
73142000	3,307	\$6,120,054	3,345	\$5,749,202	4,327	\$9,861,745
73143110	37,386	\$44,382,472	35,493	\$40,953,977	37,038	\$45,405,710
73143150	11,789	\$14,870,999	13,834	\$15,648,443	16,014	\$19,090,049
73143900	4,813	\$10,351,807	5,248	\$9,450,007	5,288	\$10,967,018
73144100	17,129	\$21,393,273	17,956	\$20,910,650	18,500	\$22,135,445
73144200	4,011	\$7,070,134	6,892	\$9,886,501	8,730	\$15,205,515
73144930	4,029	\$8,326,079	4,267	\$7,537,030	3,732	\$7,645,158
73144960	3,494	\$9,595,550	5,188	\$11,698,547	4,271	\$9,931,057
73145000	867	\$3,910,646	1,788	\$5,404,686	1,517	\$5,421,037
SUB TOTAL	108,799	\$184,679,890	107,944	\$167,980,678	115,620	\$196,488,818

CLOTH,GRILL,NETTING & FENCING

AMERICAN WIRE PRODUCERS ASSOCIATION

Annual Imports from China

Volume in Metric Tons, Value in US Dollars

WIRE PRODUCTS	2015		2016		2017	
	HTS code	Volume	Value	Volume	Value	Volume

Chain

73151100	20,062	\$63,051,980	17,610	\$54,623,581	19,131	\$59,685,468
73151200	9,908	\$26,066,012	7,527	\$19,584,084	6,697	\$18,458,136
73151900	3,638	\$10,890,567	4,360	\$12,117,301	5,941	\$17,510,419
73152010	9,821	\$16,425,627	10,179	\$16,901,580	12,588	\$19,456,340
73152050	1,394	\$3,077,826	1,112	\$2,261,826	3,503	\$6,272,370
73158100	4,177	\$5,567,254	2,965	\$3,186,989	2,640	\$3,383,526
73158210	4,302	\$8,127,727	4,583	\$7,403,934	5,645	\$9,212,788
73158230	4,046	\$6,694,369	4,080	\$6,011,324	4,204	\$5,842,810
73158250	22,932	\$33,324,006	21,210	\$28,038,185	24,407	\$33,614,646
73158270	4,841	\$7,319,818	3,059	\$4,336,908	3,722	\$5,226,419
73158910	2,130	\$4,911,888	2,065	\$5,091,153	1,825	\$4,808,028
73158930	1,289	\$4,986,431	1,128	\$4,604,438	1,012	\$6,269,729
73158950	807	\$3,646,424	902	\$3,802,773	1,003	\$4,026,283
73159000	3,916	\$11,472,750	3,591	\$11,038,477	4,526	\$11,909,823
SUB TOTAL	93,263	\$205,562,679	84,371	\$179,002,553	96,844	\$205,676,785

CHAIN**NAILS & STAPLES**

73170010	553	\$1,952,820	351	\$1,609,633	311	\$1,296,392
73170020	2,358	\$9,170,588	3,474	\$10,786,003	4,779	\$12,695,120
73170030	380	\$1,114,250	215	\$687,245	348	\$1,035,948
73170055	213,349	\$207,229,984	219,645	\$188,489,271	208,506	\$203,855,946
73170065	4,566	\$8,376,548	4,258	\$7,870,649	4,148	\$7,619,138
73170075	12,234	\$17,239,507	15,794	\$19,268,354	12,971	\$16,917,337
SUB TOTAL	233,440	\$245,083,697	243,737	\$228,711,155	231,063	\$243,419,881

NAILS & STAPLES

AMERICAN WIRE PRODUCERS ASSOCIATION

Annual Imports from China

Volume in Metric Tons, Value in US Dollars

WIRE PRODUCTS	2015		2016		2017		
	HTS code	Volume	Value	Volume	Value	Volume	Value
SCREWS,BOLTS & NUTS							
73181100	13,183	\$15,681,420	11,122	\$11,992,212	11,504	\$14,414,728	
73181200	3,966	\$8,243,640	4,097	\$8,647,293	4,418	\$9,642,661	
73181300	4,409	\$12,232,675	3,649	\$11,265,964	3,894	\$12,040,715	
73181410	67,816	\$128,595,758	79,036	\$135,694,498	67,270	\$127,869,129	
73181450	4,319	\$11,796,817	4,239	\$10,789,320	5,149	\$13,533,954	
73181520	177,814	\$293,034,847	165,706	\$251,886,643	166,120	\$276,991,051	
73181540	12,229	\$20,756,118	11,326	\$21,193,046	11,700	\$23,648,535	
73181550	41,391	\$82,646,269	31,264	\$57,356,933	46,016	\$80,448,754	
73181560	3,346	\$15,537,300	3,483	\$16,889,848	3,411	\$16,085,580	
73181580	8,283	\$27,430,159	7,321	\$25,415,710	9,194	\$32,163,479	
73181600	104,351	\$217,266,945	98,479	\$192,591,490	112,405	\$246,812,084	
73181900	6,886	\$29,531,560	5,901	\$25,600,334	8,041	\$32,590,505	
73182100	3,776	\$10,390,809	3,981	\$10,113,305	3,842	\$10,552,001	
73182200	49,625	\$89,826,315	52,904	\$79,055,894	56,503	\$90,443,369	
73182300	2,662	\$11,317,738	2,531	\$10,119,938	2,173	\$11,586,843	
73182400	1,419	\$7,057,692	1,509	\$6,919,987	1,916	\$8,822,327	
73182900	11,469	\$62,333,676	10,699	\$56,325,117	11,119	\$60,047,914	
SUB TOTAL	516,944	\$1,043,679,738	497,247	\$931,857,532	524,675	\$1,067,693,629	

SCREWS,BOLTS & NUTS**SPRINGS**

73201030		732	\$1,217,917	989	\$1,552,414	1,070	\$1,724,539
73201060		11,417	\$11,824,581	9,313	\$9,976,836	13,586	\$14,726,377
73201090		13,794	\$15,431,555	18,711	\$18,206,569	17,682	\$17,517,521
73202010		420	\$1,935,301	363	\$1,773,549	353	\$1,926,698
73202050		9,678	\$26,873,781	6,970	\$23,422,818	6,250	\$23,388,501
73209010		113	\$872,797	47	\$323,077	37	\$225,748
73209050		7,155	\$15,098,418	6,427	\$14,030,092	7,009	\$16,226,535
SUB TOTAL		43,309	\$73,254,350	42,820	\$69,285,355	45,987	\$75,735,919

SPRINGS**ARTICLES OF STEEL WIRE, NOT ELSEWHERE SPECIFIED**

73262000	N/A	\$214,329,534	N/A	\$237,011,868	N/A	\$213,066,741
----------	-----	----------------------	-----	----------------------	-----	----------------------

TOTAL ALL WIRE PRODUCTS	2015		2016		2017	
	Volume	Value	Volume	Value	Volume	Value
	1,086,310	\$2,150,593,239	1,083,755	\$2,014,307,761	1,121,370	\$2,208,867,774

ATTACHMENT 2

AMERICAN WIRE PRODUCERS ASSOCIATION'S COMMENTS
CONCERNING
CHINA'S COMPLIANCE WITH WTO COMMITMENTS
(DOCKET NUMBER USTR-2016-0012)
(SEPTEMBER 21, 2016)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

AMERICAN WIRE PRODUCERS ASSOCIATION
COMMENTS ON PROPOSED ACTION IN CONNECTION WITH USTR'S SECTION 301 DETERMINATION
REGARDING CHINA'S ACTS, POLICIES, AND PRACTICES RELATED TO TECHNOLOGY TRANSFER,
INTELLECTUAL PROPERTY, AND INNOVATION
(DOCKET NUMBER USTR-2018-0005)

MAY 11, 2018



AWPA
American Wire Producers Association

American Wire Producers Association

PO Box 151387
Alexandria, VA 22315

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;

¹ See *Office of the United States Trade Representative, Request for Comments and Notice of Public Hearing Concerning China's Compliance With WTO Commitments*, 81 Fed. Reg. 54,646 (August 16, 2016).

W I R E I S E V E R Y W H E R E

office 703.299.4434 / email info@awpa.org / www.awpa.org

- (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 AWWA 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 AWWA 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 AWWA 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.

² *Omnibus Trade and Competitiveness Act of 1988*, 22 U.S.C. § 5305. *The Trade Facilitation and Trade Enforcement Act of 2015*, Public Law 114–125, set out intensified evaluation provisions for monitoring unfair currency practices.

³ See, e.g., *U.S. Department of the Treasury, Office of International Affairs: Report to Congress on International Economic and Exchange Rate Policies* (April 9, 2015) at 3–4 and 11–14; *U.S. Department of the Treasury, Office of International Affairs: Report to Congress on International Economic and Exchange Rate Policies* (April 15, 2014) at 3–4 and 12–17.

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 AWWPA 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 AWWPA 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 AWWPA'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 AWWPA'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."⁶ 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."⁷ 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

⁶ United States Trade Representative, *2009 Report to Congress on China's WTO Compliance* (December 2009) ("*2009 Report*") at 38–39.

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.

⁹ United States Trade Representative, *2011 Report to Congress on China's WTO Compliance* (December 2011) (“*2011 Report*”) at 37.

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.¹¹

The USTR's subsequent reports in 2012, 2013, and 2014 reiterated these concerns in almost exactly the same language.¹² 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

¹¹ *Id.* (emphasis supplied).

¹² United States Trade Representative, *2012 Report to Congress On China's WTO Compliance* (December 2012) ("*2012 Report*") at 43–44; United States Trade Representative, *2013 Report to Congress On China's WTO Compliance* (December 2013) ("*2013 Report*") at 42–43; United States Trade Representative, *2014 Report to Congress On China's WTO Compliance* (December 2014) ("*2014 Report*") at 11–12 and 53–54.

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

¹³ United States Trade Representative, *2015 Report to Congress On China's WTO Compliance* (December 2015) ("*2015 Report*") at 56.

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.”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.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.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.¹⁸ Thus, as the *2015 Report* concluded:

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, **particularly wire products** and steel

¹⁵ *Id.*

¹⁶ *Id.* at 55.

¹⁷ *Id.*

¹⁸ *Id.*

pipe and tube products, causing a surge in exports of these products, many of which ended up in the U.S. market.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.”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 AWWA. 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

¹⁹ *Id.* at 56 (*emphasis supplied*). *See also* Exhibit 1.

²⁰ 2015 Report at 56.

wire products.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.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.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.²⁴

²¹ See *id.* at 60–64 and 101–104.

²² *Id.* at 60 and 62–63.

²³ *Id.* at 63.

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 AWPAs 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.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.²⁸ The Senator's staff created a fictitious

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 Rescission, in Part*, 76 Fed. Reg. 26,696 (May 9, 2011) at 26,697 (“{T}he 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 Rescission, in Part, of the Second Antidumping Duty Administrative Review*, 76 Fed. Reg. 66,903 (October 28, 2011) at 66,905 (“{W}e intend to refer this matter to CBP to investigate whether this entry was 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 (“{W}e intend to refer this matter to CBP to investigate whether Jiaxing Xinyue's entries were entered improperly”).

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.”²⁹ 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.³⁰ 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

²⁹ Staff Report Prepared for Senator Ron Wyden, *Duty Evasion: Harming U.S. Industry and American Workers* (November 8, 2010) at 5. The report is attached as Exhibit 3.

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.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

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. 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. *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); *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 AWPAs respectfully urge 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 AWPAs respectfully urge 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

³³ See *2011 Report to Congress of the U.S.-China Economic and Security Review Commission* (November 2011) at 129–130; *2012 Report to Congress of the U.S.-China Economic and Security Review Commission* (November 2012) at 109–110; *2013 Report to Congress of the U.S.-China Economic and Security Review Commission* (November 2013) at 1–2, 7–8, 48, and 79; *2014 Report to Congress of the U.S.-China Economic and Security Review Commission* (November 2014) at 30 and 227–228; *2015 Report to Congress of the U.S.-China Economic and Security Commission* (November 2015) at 50–52, 55–57, 167–169, and 563.

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 AWPAs submit 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.³⁴ 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 AWP 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

³⁴ 19 U.S.C. § 1677(18)(B).

MR. EDWARD GRESSER
TRADE POLICY STAFF COMMITTEE
OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE
September 21, 2016
Page 25

CHINA'S WTO COMPLIANCE
DOCKET No. USTR-2016-0012

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

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

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

Source: U.S. Department of Commerce and U.S. International Trade Commission, Trade DataWeb; AIS Import Report 3 (2001–2015).

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 UPDATE**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. 3A Industrial Supply, LLC (Oct. 5, 2014)

United States v. AMW Trading, Inc. (Oct. 8, 2014)

United States v. Six Star Wholesale Inc. (Oct. 8, 2014)

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/callegations/>



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:

- Magnesite 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

Fiscal Year	Percent in ACE	Percent in ACS
2010	0.11	99.89
2011	0.17	99.83
2012	0.47	99.53
2013	11.59	88.41
2014	26.03	73.97
2015	57.34	42.66
2016	72.59	27.41

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:

Laredo, TX	February 23-25
New Orleans, LA	April 12-14
Philadelphia, PA	May 17-19
Los Angeles / Long Beach CA	July 19-21
Detroit, MI	August 23-25



Antidumping and Countervailing Duty Centralization Team

In April, one Import Specialist from each Center for Excellence and Expertise (CEE), collectively known as the Antidumping and Countervailing Duty (AD/CVD) Centralization Team, (ACT) were detailed to the Antidumping/Counter Vailing Duty Division within the Office of International Trade (OT). The ACT is a “virtual” team; each of the members continues to work from their regular port location.

ACT facilitates the centralization of compilation of information relative to CPB’s carrying out Commerce’s liquidation and other instructions that previously was done by all ports, thus eliminating redundancy of work. This new approach to oversight is intended to increase the accuracy of the AD/CVD liquidation process, and frees up resources for AD/CVD and other trade enforcement.

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.

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.



Cynthia Whittenburg, (in the foreground, first chair by the marble partition) Acting Deputy Assistant Commissioner, Office of Trade, co-chair of steel hearing

If you have knowledge of a violation of U.S. trade laws, please report it by filing an e-Allegation at <https://apps.cbp.gov/eallegations>

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
Shenzen 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)

Hanhen Shipping (China) Co., Ltd 62

Suzhou Yuncheng Ex/Im Co., Ltd 62

L'Assurex International Logistic Ltd. 63

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 snap shots 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

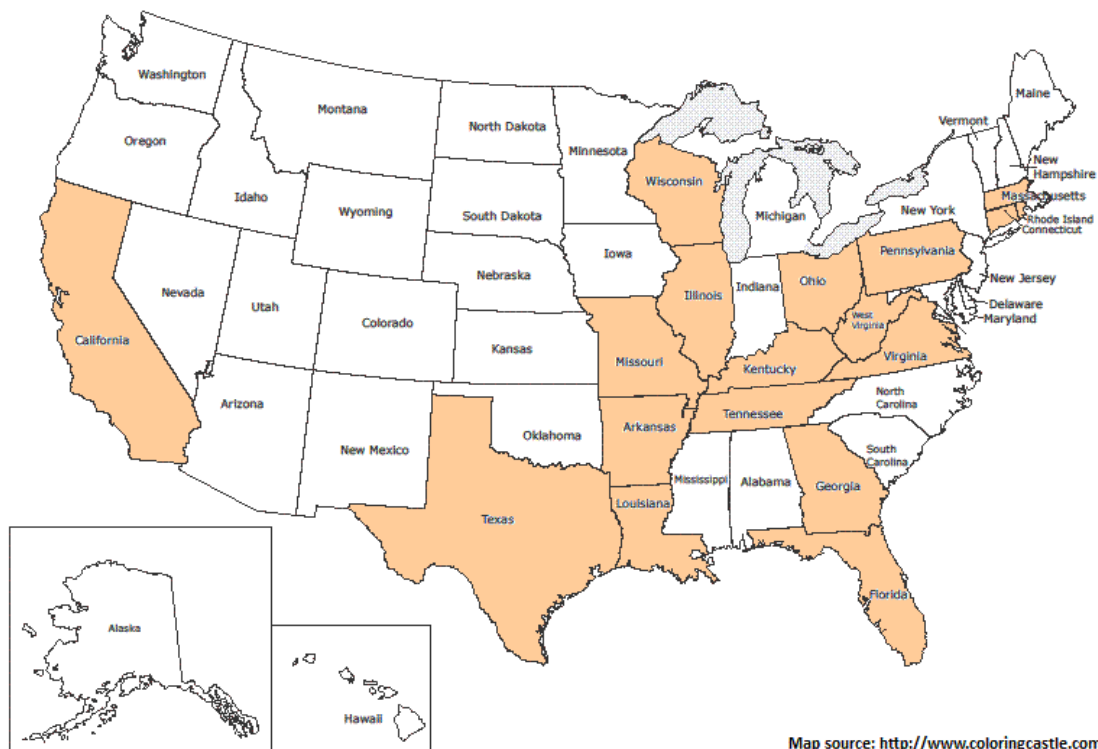
(DOC Case No. A-570-909)

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. producers' U.S. shipments in 2007: \$220 million
- ⇒ U.S. employment of production and related workers in 2007: 791
- ⇒ U.S. production locations: Arkansas, California, Connecticut, Florida, Georgia, Illinois, Kentucky, Louisiana, Massachusetts, Missouri, Ohio, Pennsylvania, Rhode Island, Tennessee, Texas, Virginia, Wisconsin, West Virginia
- ⇒ 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.,

Explanation:

Company A describes its business and products. In the second email, staff asks if it is possible to avoid paying duties.

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

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 themselves. 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.,

Explanation:

When asked if there is a way to avoid paying duties, Company A initially says no. However, when illegal transshipment is proposed as a way to avoid paying duties, Company A agrees, demonstrating at the very least that it is aware of the method. In this instance, Company A offers to ship product through a third country.

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

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.

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 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 produce the steel nail for 46years.

If you need the quotation,pls 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 ***

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.

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 ***

Company C

Product: Steel Nails

Country of origin: China

Means to evade duties: Illegal transshipment

From: feedback@service.alibaba.com

To: ***

Sent: Tues, August 31, 2010 5:13 AM

Subject: [avisonetraders@gmail.com]Inquiry about your product

Explanation:

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

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. anti-dumping 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 .

Explanation:

In this series of emails, staff ask Company C whether their nails are subject to U.S. antidumping duties and whether there is a way to avoid paying the duties. Company C proposes shipping product to Malaysia, changing containers, and then sending the new container with a different country of origin certificate to the United States.

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

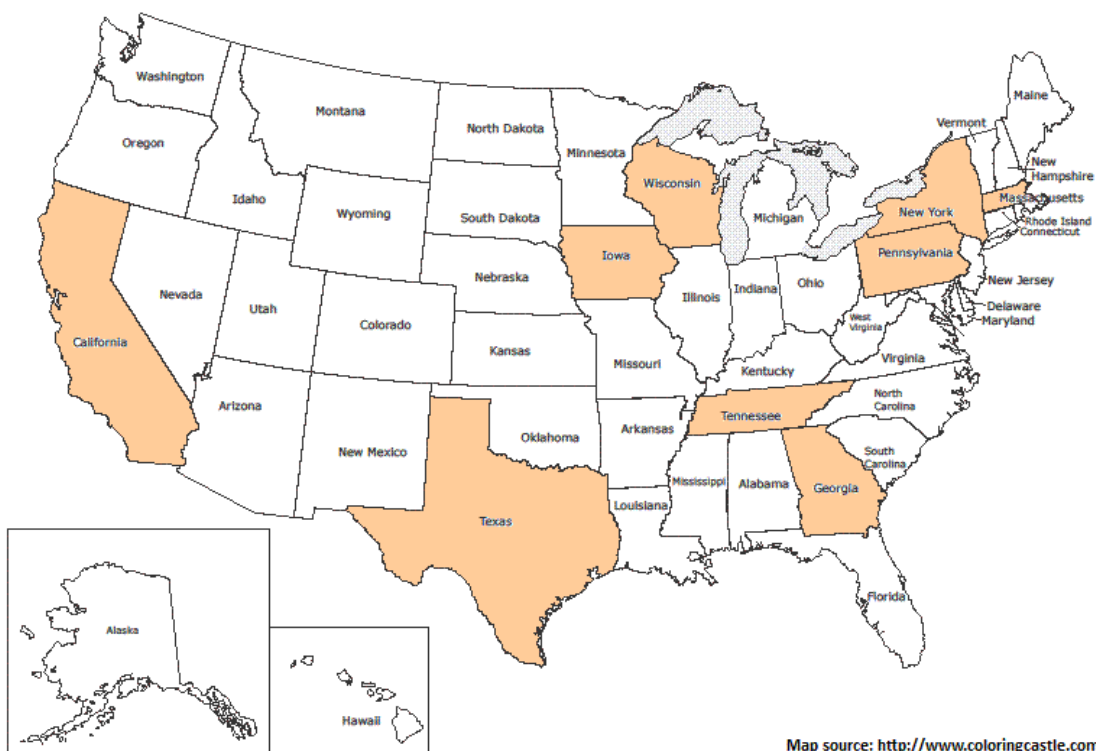
(DOC Case No. A-570-901)

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. producers' U.S. shipments in 2005: \$260 million
- ⇒ 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

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.

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

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,

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.

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 experience?](#)

Regards,
Paul

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

Explanation:

In the first email, Company D offers to illegally ship product through Malaysia to avoid paying duties. Company D confirms that it can change the country of origin when asked by staff.

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

Company E (cont'd)

From: ***

Sent: Wed, September 1, 2010 1:39 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Our product

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 !

Explanation:

In the first email, Company E describes its business and products. In the second email, staff asks if Company E's products are subject to antidumping duties and whether it is possible to avoid paying duties.

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

Company E (cont'd)

From: ***

Sent: Wed, September 15, 2010 4:26 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Our product

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 commerical 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)

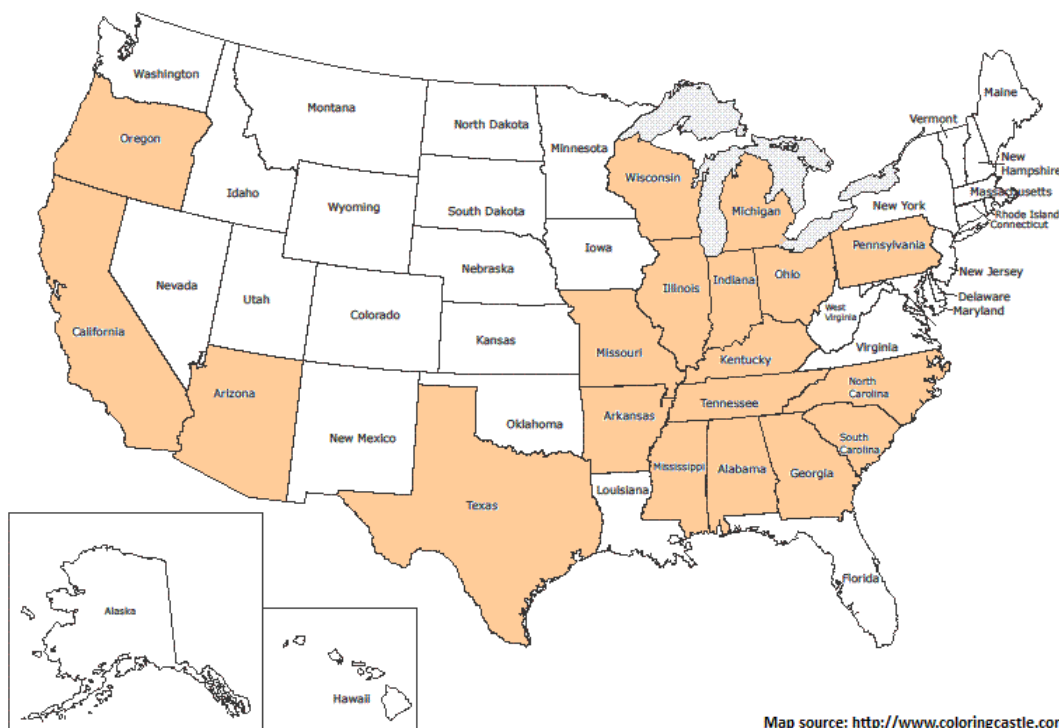
Carbon-quality welded light-walled rectangular pipe and tube is often referred to as ornamental or mechanical tubing. Principal uses include ornamental fencing, window guards and framing, and railings for construction and agricultural applications. It is also used in metal furniture, athletic equipment,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

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



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 quotation 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 anti-dumping tariffs on imports.Are you clear about this ??

Hope you can tell me more about .

Yours

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.

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

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 Sincerely

Explanation:

Company F offers proposes "entrepot trade" another name for illegal transshipment. Company F states that it will help find a logistics company that can illegally transship.

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.

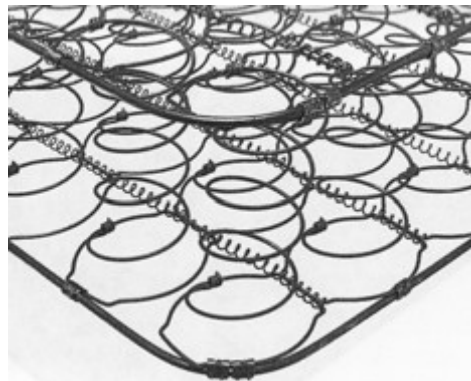
Uncovered Innersprings Units from China

(DOC Case No. A-570-928)

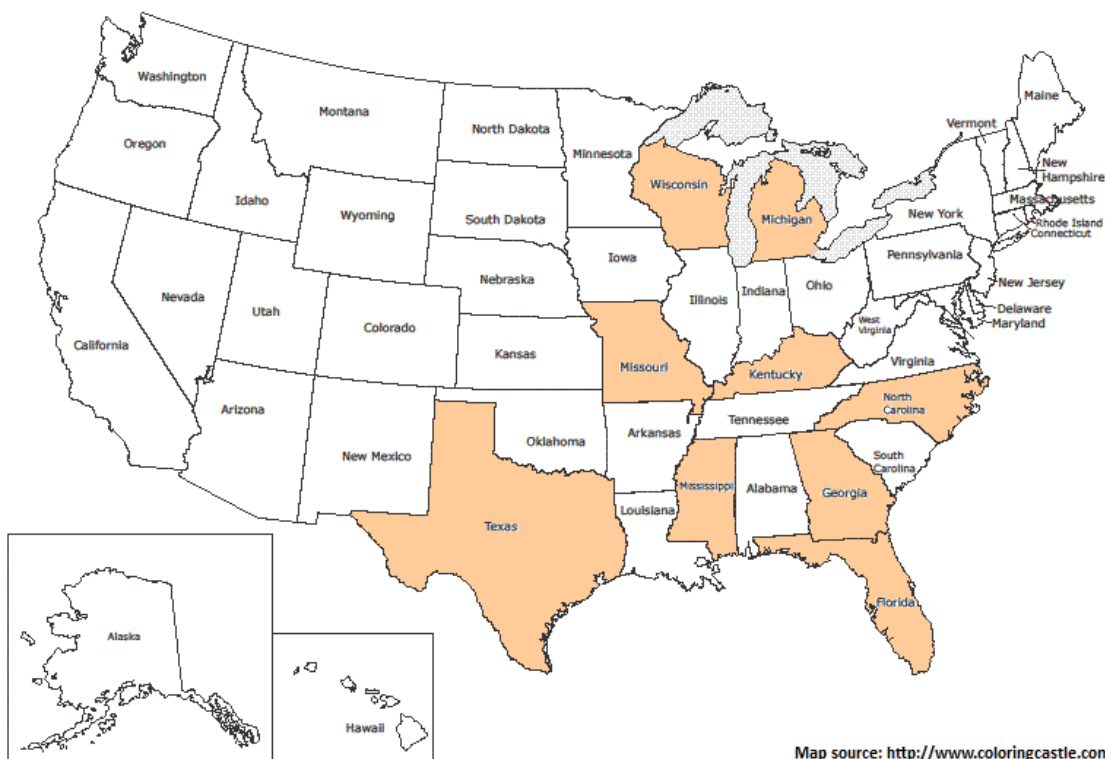
Uncovered innerspring units are composed of a series of individual metal springs joined together and used as the innerspring component in the manufacture of innerspring mattresses.

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



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.

Company G (cont'd)

From: ***

Sent: Wed, September 1, 2010 3:17 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: RE:FW [avisonetraders@gmail.com]I want to buy the product you are sel

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

Explanation:

In response to staff's inquiry, Company G proposes illegally transshipping innersprings through a third market to avoid paying duties, or proposes that the U.S. importer undertake minor assembly of the product in the United States.

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 (USITC)

U.S. Production Locations of Natural Bristle Paint Brushes



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.

Company H (cont'd)

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" <avisonetraders@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,

Explanation:

Company H proposes exporting its products under a different name—in this case, the name of the shipping agent. Staff respond by asking if it possible also to change the country of origin certificate. Company H says that this is not possible, and proposes that AvisOne purchase brushes not subject to AD duties.

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 ***

My apologies for responding late to your email. As your describe it, your company can ship product under a different name (in this case, 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" <avisonetraders@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 Inscpetion 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,

Company H (cont'd)

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.

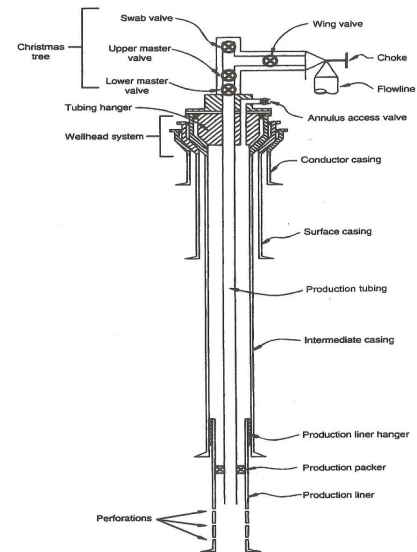
Explanation:

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

(DOC Case No. C-570-944)

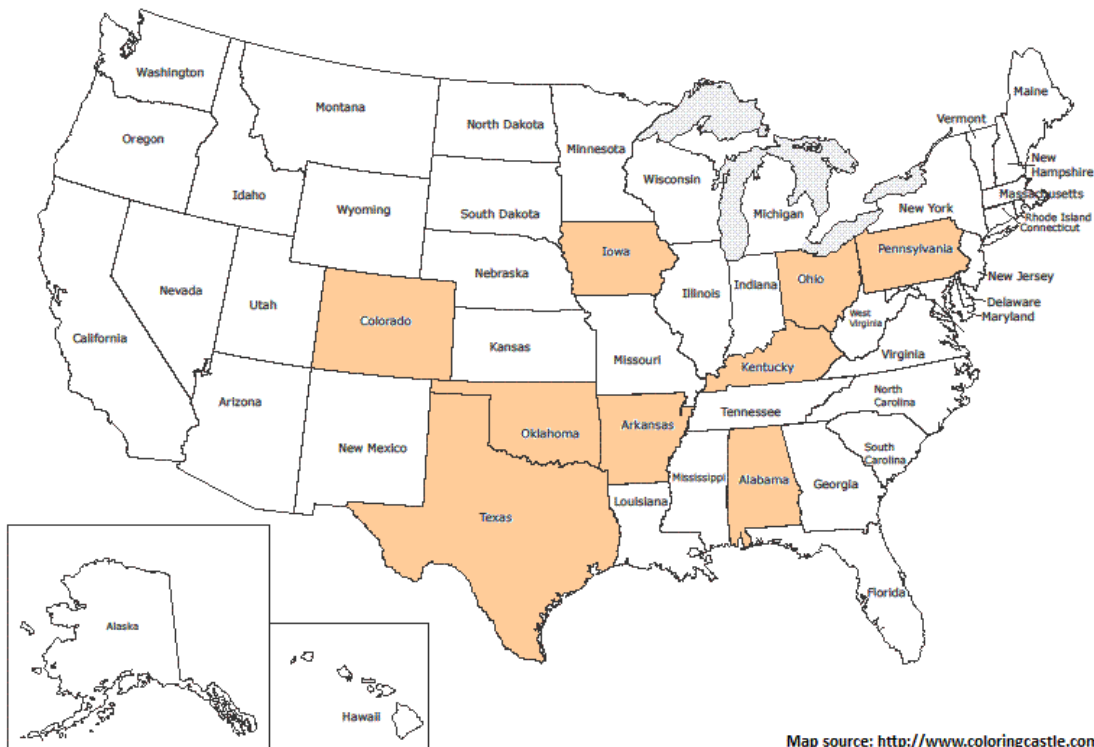
OCTG include carbon and alloy steel casing and tubing used in oil and gas wells. Casing is a circular pipe that serves as a structural retainer for the walls of the well. Tubing is installed inside the casing and is used to conduct the oil and gas to the surface.



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.

Company I (cont'd)

From: ***
Sent: Wed, August 11, 2010 9:46 AM
To: ***
Subject: DEAR *** PIPES FOR USA

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

BEST REGARDS

Explanation:

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)

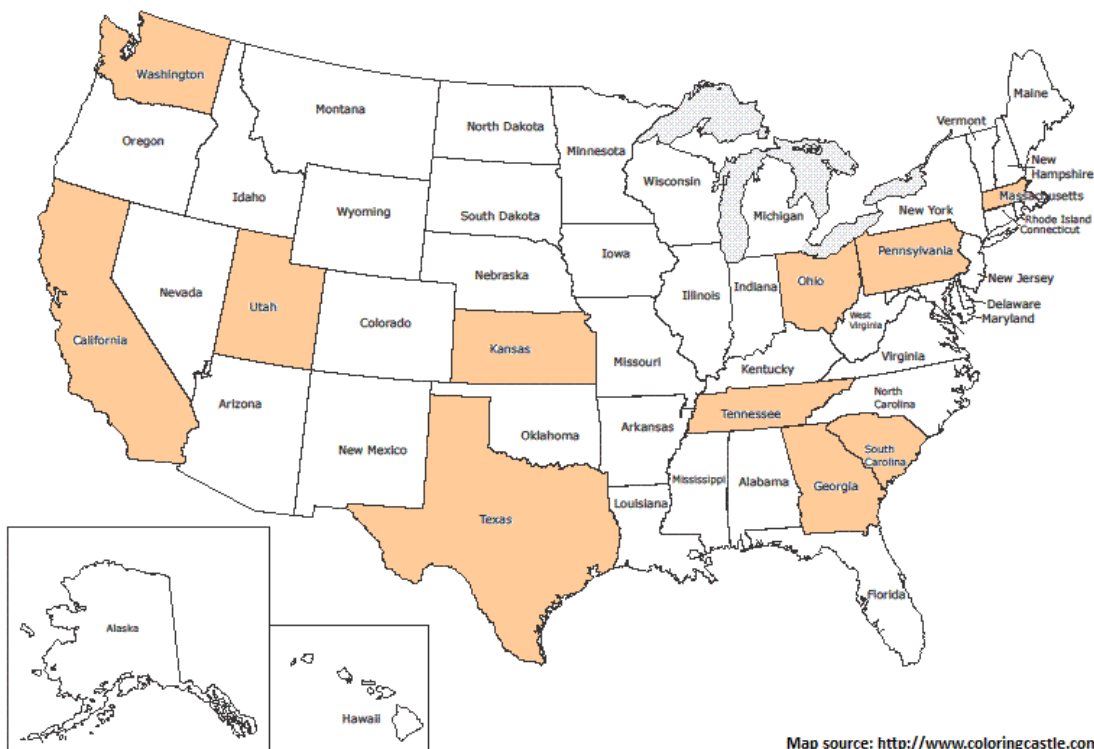
Diamond sawblades are circular cutting tools that have numerous functions and applications for cutting, ranging from cement, asphalt, marble, and tile, to masonry work such as brick and stone.

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



Map source: <http://www.coloringcastle.com>

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 willing 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

Explanation:

In this email, Company J describes its business and products.

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

Company J (cont'd)

From: ***

Sent: Thur, December 10, 2009 9:47 PM

To: ***

Subject: Re: Diamond tools and cutting machineries

Are your saw blades subject to antidumping duties?

From: ***

Sent: Thur, December 10, 2009

To: ***

Subject: Diamond tools and cutting machineries

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 anti-dumping 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.

Company K

Product: Diamond sawblades

Country of origin: China

Means to evade duties: Illegal transshipment

Explanation:

Company K engages in illegal transshipment to avoid paying duties.

From: ***

Sent: Thur, August 5, 2010 9:28 PM

To: ***

Subject: Re: Diamond Blades

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)

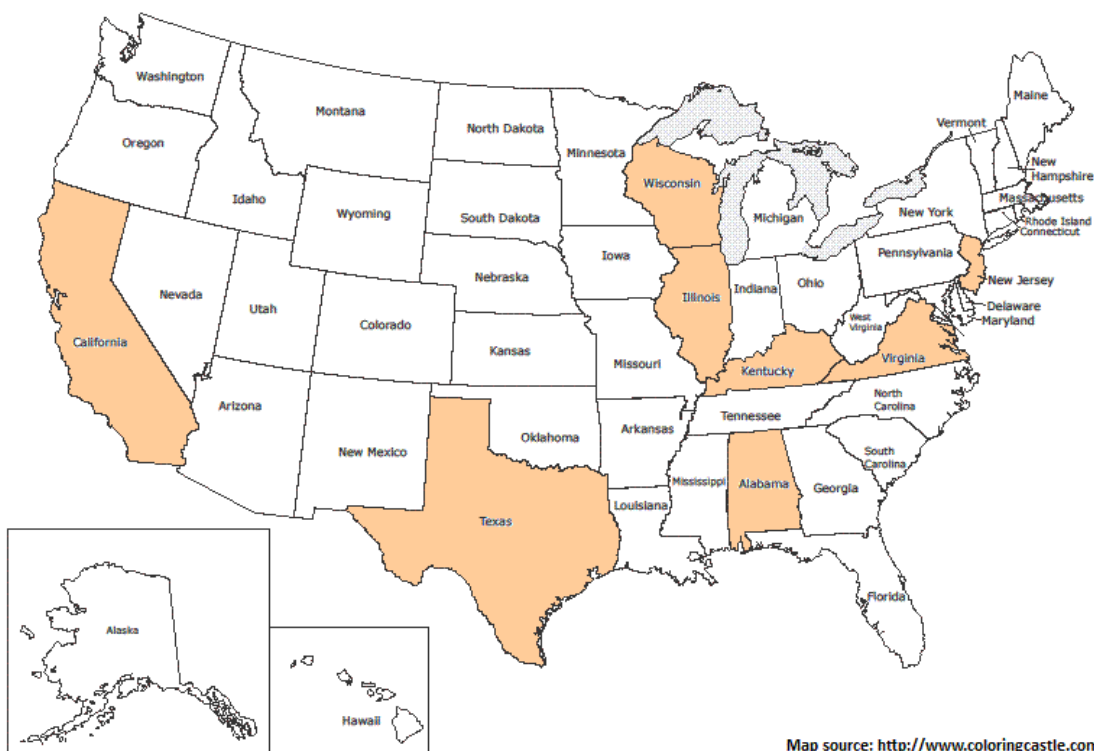
Steel wire garment hangers are produced primarily for use by the dry cleaning, industrial laundry, textile, and uniform rental industries.

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:

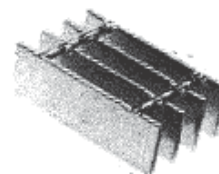
Company M offers to illegally ship product through a third country to avoid paying duties. As stated by Company M, this service is offered to "our friends" and that illegal transshipment "is a benefit for us and our client."

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.

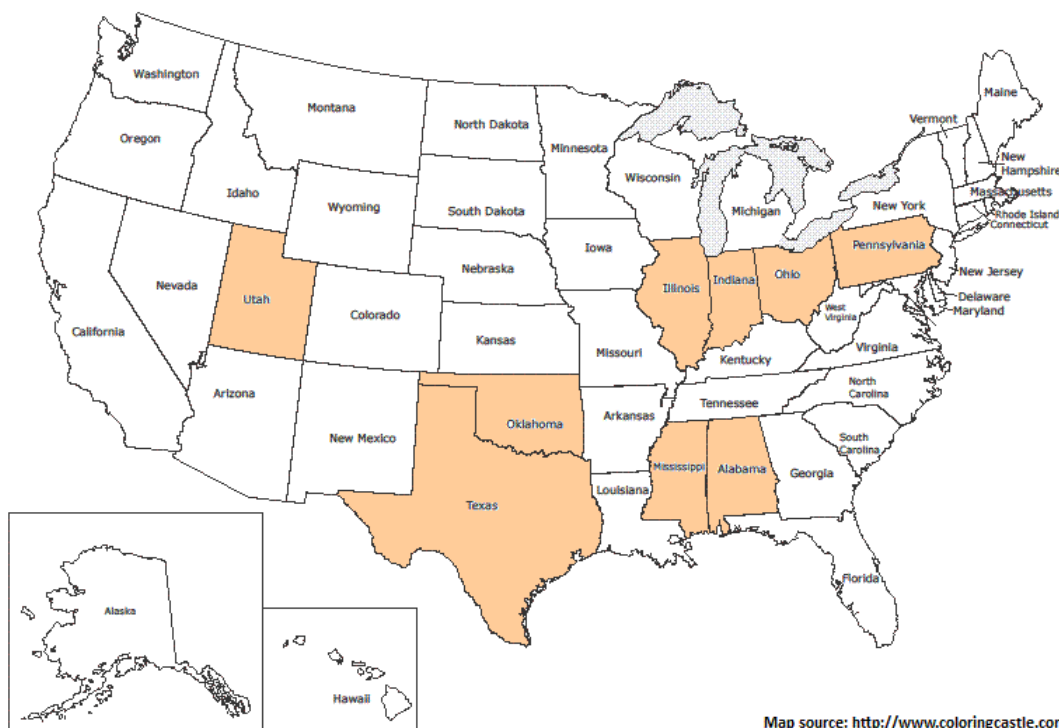
Steel grating is designed to support and distribute the weight of objects. Common end uses include walkways, mezzanines, catwalks, fire escapes, stairways, and flooring.



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



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
Web:	http://www.everskyline.com/special1.php?id=6 http://www.alibaba.com/member/cn109650969.html http://www.made-in-china.com/showroom/infism/companyinfo/Eversky-International-Forwarding-Agency-Co-Ltd-.html
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
Web:	http://www.hltNB.com http://blog.china.alibaba.com/blog/nb75520859/article/b0-i7726014.html
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.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:	http://pulinktranschina-3141826.en.gongchang.com/ http://www.hifob.com/redirect.php?tid=22211&goto=lastpost
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, Zhapu, 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 Interntional Logistics, Ltd.

Address:	Room 2207, Gonglu Building, Block C, Yitai Centre, Dongmembei Road, Luohu District, Shenzhen, China, 518003 Tel: +(86) 0755 2519 1363 Email: sunpower@szsuperior.com
Web:	http://www.szsuperior.com/cn/home/index.asp http://www.ilazhu.cn/search/sell-service-9.html
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.cn 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
Web:	http://www.wintrans.com.cn/en/info/detail.asp?ID=5 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%95%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:	<p>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</p> <p>Gateway Container Line Co., Ltd. (Tianjin) Room 2602, Twain building, Hangua Plaza, Dagunan Road, Hexi District, Tianjin, China, 300000</p> <p>Gateway Container Line Co., Ltd. (Shanghai) Room 2201, No. 1, Alley 258, Dongbaoxing Road, Shanghai, China, 200080 Tel: +(86) 21 6356 0173</p> <p>Room 612, Hesun Building, No. 1600 Yan'an Road (W), Shanghai, China, 200052 Tel: +(86) 21 5258 5515</p> <p>Gateway Container Line Co., Ltd. (Ningbo) 19 Floor, Unit B, Century Square, No. 118 Daliang Street, Ningbo, China, 315000 Tel: +(86) 574 8717 5858</p> <p>Gateway Container Line Co., Ltd. (Shenzhen) Room 1705, Building A, Huaguoshan Building, South Garden Road, Shekou, Shenzhen, China, 518067 Tel: +(86) 755 2680 5586</p>
Web:	http://www.gateway-group.cn/en/index.htm
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
Web:	http://www.globesuccess.com.cn/en/index.asp http://www.ecplaza.net/tradeleads/seller/5605380/transshipment_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
Web:	http://www.dynaprc.com/english/index.asp 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.

Address:	A-1109, Jintian Building, Heping Road, Luohu, Shenzhen, China Tel: +(86) 0755 2556 5280
Web:	http://www.hanhen.com http://ca2.mofcom.gov.cn/aarticle/supplydemandofchina/supply/200905/20090506267440.html
Identification no:	China Tax ID: 440300769195249 United Nations Procurement Division Vendor ID: 09D00065 (Logistic Supplier)
Other info:	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.

Suzhou Yuncheng Ex/Im Co., Ltd.


Address:	No. 8-7 Shop, Shuixiang West Road, Meili Street, Songling Town, Wujiang, Jiangsu, China, 215200
Web:	http://yuncheng.en.alibaba.com/trustpass_profile.html http://www.alibaba.com/product-gs/269042075/Third_country_re_exports_seamless_steel.html
Company representative:	Mr. Yucheng Zhou
Business registration no.:	320584000113121
Issuing authority:	Suzhou City Wujiang Administration for Industry and Commerce
Issue date:	10/18/2007
Expiration date:	10/17/2017
Registered capital:	RMB 3,000,000
Other info:	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.

Foreign Companies Willing to Evade U.S. AD/CV Duties (cont'd)

L'Assurex International Logistic Ltd.

Address:	Room 1207, Logistics Center, No. 1, Haitian Road, Huli, Xiamen, Fujian, China, 361000
Web:	http://www.lassurex.com http://www.alibaba.com/product-gs/282892965/sea_freight.html http://lassurex.en.alibaba.com/product/283189523-209769395/shipping_agency_in_china.html?tracelog=cgsotherproduct1
Company representative:	Mr. Liming Zheng
Registration no.:	350200200006505
Issuing authority:	Xiamen City Administration for Industry and Commerce
Issue date:	10/11/2007
Expiration date:	10/10/2027
Registered capital:	RMB 10,000,000
Other info:	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.

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



The Economic and Commercial Counsellor's Office of the
Embassy of the People's Republic of China in Canada
中华人民共和国驻加拿大大使馆经济商务参赞处

Commercial News : Bilateral Visits : Supply & Demand : Exhibition Info : About Us : Bilateral Cooperation : About China
China Law : Host Country : Laws of Host Country : Enquiry Online

Current Location: [Homepage](#) > [Supply & Demand](#) > [Cooperation](#) > [Text](#)

Hanhen Shipping Company search for cooperation

Thursday, May 21, 2009 Posted: 21:12 BJT(12 GMT)
From: Hanhen Shipping Company Article type: Reproduced

Dear Sir/Madam,

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

About Hanhen Shipping Company -- <http://www.hanhen.com/>
Logistics Partner of United Nations (VENDOR ID:09D00065)

My company has many years' experience in handling FCL/LCL/AIR/LAND/RAIL shipments. We provide a wide range of shipping services, including arranging local contact with the shipper(MAERSK, YANGMING, EVERGREEN, WANHAI, APL, COSCO and CSCL etc.), issuing of delivery documents, custom clearances etc. Especially we have a great advantage in rail transport from China to Russia/Middle Asia and large engineering machine 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 most locations
Rail transport from Tianjin/Shanghai/Lianyungang/Xiamen/Shenzhen to Russia/Middle Asia, etc.
Industrial Projects Handling, Large Engineering Machine Transport (Such as crane, Heavy equipment etc.)
Sea Export & Import Service (FCL/LCL/Consolidation)
Air Freight Service
Third Party Logistics
Dangerous Cargo Handling
Transshipment from China to Malaysia then to USA direct, to avoid quota and provide C/O of Malaysia.
Handling of documents and cargos for FOB to CIF transactions, including switch MBL and HBL
Assistance in application for Certificate of Origin, Form A, Legalisation of Docs, BV, SGS, as per instructions
Diversion of Shipments
Import to Shanghai/Ningbo/Shenzhen/Guangzhou
Import from Hongkong to Mainland China under CEPA
ATA/Personal Effects/Air Shipment
Door to door delivery (Mainly USA, Canada, India, Europe)
Warehouse consolidation services - 1. Receive cargo from more than one suppliers and loading container; and 2. Our warehouse can be used as your storage centre, you can put 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, pls kindly feel free to contact us! And I'm sorry if any inconvenienced that caused by this e-mail.

Best Regards!
kent chen

Hanhen Shipping (China) Co., Ltd
1109, Jintian Building, Heping Road,
Luohu, Shenzhen, China.
Tel: +86 0755 25565280
Fax: +86 0755 25561580
Cell: +86 13818671486
Skype: kentchenxujun
Msn: kent@hanhen.com
Email: kent@hanhen.com
<http://www.hanhen.com>
A leader of 3PL supplier in Asia

[【Big medium-sized small】](#) [【Print】](#) [【Transmit】](#)

Relative Articles:

- sunever company limited searches for cooperation 2009-04-27 21:28
- Limy Shuangling Plastic Co., Ltd. searches for cooperation 2009-04-27 21:25
- Linsound Hearing Aid (Fuzhou) Co., Ltd. search for cooperation 2008-12-26 00:33
- Angel lighthouses factory search for cooperation 2008-12-26 00:15
- HANGZHOU MINGFA SEALING MATERIALS CO., LTD. search for cooperation 2008-12-26 00:13
- Canada, China to further enhance bilateral cooperation 2008-12-21 11:22

Release Comment:

Pen Name:

View Comment

Submit

Copyright 2004, Ministry of Commerce of P.R. China
All Rights Reserved Please use 125.0 and above to browse this site



Home > Contract Logistics > Triangular Trade

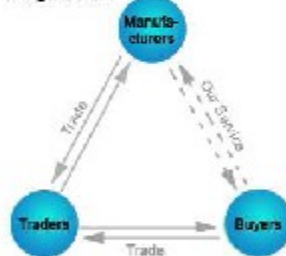
Out-Sourcing Logistics
International Distribution
Triangular Trade
Business Service

According to traders' demands in commercial interests and import tariff reduction, we provide BL switch for triangular trade, changing the CO, etc 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 a 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.



Triangular Trade



Re-export Trade



Contact: sales@hanhen.com | Global Contact: info@hanhen.com
Tel: +86 755 25594780 Fax: +86 755 25561580/1680



By accessing and using this Web site, you agree to its [Legal Terms and](#)
2007, ©Hanhen Shipping

Welcome to Alibaba.com, Join Free | Sign In
Buy | Sell | Community | My Alibaba | My Favorites | Help

Global trade starts here.™

Products Suppliers Buyers

Buy on AliExpress.com

Search Products

About 909 results: Sea Freight (706)
Advanced Search

Home > Products > Business Services > Logistics Services > Sea Freight (95839)

Language Options

There are 909 transshipment from 115 suppliers on Alibaba.com

Related Searches: transshipment, Wholesale transshipment

transshipment,the best way to avoid anti-dumping

Other products by Shipment Type: FCL and LCL

FOB Price: US \$2,000 - 8,000 / Carton **Negotiable**

Port: china

Minimum Order Quantity: 1 Carton/Cartons

Supply Ability: 100 Carton/Cartons per Day

Payment Terms: L/C,D/A,D/P,Western Union,MoneyGram

Ms. Helen Lu

Contact Supplier

Send a Message to this Supplier

Supplier Details

Asavvy Furniture Co., Ltd.
[Jiangsu, China (Mainland)]

Business Type:
Manufacturer, Trading Company,
Distributor/Wholesaler

Contact Details

Gold Supplier (1st Year)

A&V Checked

Online Showroom: 247 Products

Other Similar Products from this Supplier

View this Supplier's Website

Product Details Company Profile

Quick Details

Place of Origin: Zhejiang China (Mainland)	Brand Name: eversky	Model Number: transshipment
Departure: china	Destination: all over the world	Route: EU
Carrier: Eversky international freight forward...	Departure Day: Monday	Transit Time (Days): 35
Shipment Type: FCL and LCL		

Specifications

Are you looking for a way to avoid antidumping?
Transshipment may be the best way at present.

Nowadays, Transshipment is the best way to avoid anti-dumping duties. Now, we will tell 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 is 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 Post.

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

Send your message to this supplier

Ms. Helen Lu
View Supplier's Website
Add to My Contacts

Enter your message here

-Enter between 20 to 3,000 characters, English only.

Send

Sourcing Products & Suppliers on Alibaba.com

Search Products
Enter the product you are looking for in the Search Bar and click Search

Contact Suppliers
Click **Contact Now** to send an inquiry or **I'm online, Chat now** to chat online

Check Messages
Check quotes & messages from suppliers in your email inbox or Message Center
[Click here to learn more](#)

Related Products

transshipment,the best way to avoid anti-dumping
Are you looking for a way to avoid antidumping?
Transshipment may be the best way at present.

US \$ 2000-8000
Min. Order: 1 Carton/Cartons

[View more](#)

Search Products

Search

Related Searches: transshipment

Want to find the right supplier? [Post a Request for Quotation now!](#)

Email this page | Bookmark this page | Print this page

Company Information - Site Map - Partnerships

Buy - Sell - My Alibaba - Community - Trade Shows - Safety & Security - Help - Contact Us

Browse by: Manufacturers - Wholesalers - China Gold Suppliers - All Products - Countries - Importers - Buying Leads - China - UK - Australia

Alibaba Group: Alibaba.com | Alibaba China - Alibaba International - AliExpress - Alibaba Japan | Taobao | Alipay | Yahoo! China | Koubel.com | Allsoft

Product Listing Policy - Intellectual Property Policy and Infringement Claims - Privacy Policy - Terms of Use

Copyright © 2000-2011 Alibaba.com. All rights reserved.

Welcome to Alibaba.com, Join Free | Sign In
Buy | Sell | Community | My Alibaba | My Favorites | Help

Products
Suppliers
Buyers

Buy on **Alibaba.com**

Search Products

About 51526 results: Sea Freight (23217), Air Freight (6378) - Advanced Search

Home > Products > Business Services > Logistics Services > **Sea Freight (95839)**

Language Options

There are **51526 shipping service in china** from **1510 suppliers** on Alibaba.com

Related Searches: [shipping service in china](#), [in floor china safes](#), [ship in the bottle](#), [ship in picture frame](#), [Wholesale shipping service in china](#)

See larger image: shipping service in china

[Add to My Favorites](#)

shipping service in china

FOB Price: [Get Latest Price](#)
Payment Terms: T/T

Ms. rainnie ling

[Contact Supplier](#)
Send a Message to this Supplier

Supplier Details

L'assurex International Logistic Ltd.
[Fujian, China (Mainland)]
Business Type:
Trading Company, Agent
[Contact Details](#)
Gold Supplier [1st Year]
A&V Checked

Online Showroom: 39 Products
Other Similar Products from this Supplier
[View this Supplier's Website](#)

Product Details
Company Profile

Report Item
Share

Quick Details

Place of Origin: Fujian China (Mainland)	Brand Name: L'Assurex	Model Number: Garment;Shoes;Small household ap...
Departure: China	Destination: Brazil	

Specifications

shipping service in china:Avoid high duty& tax or Anti-dumping duty Service: Malaysia/ Indones Form A/ CO & India CO/Bengal Fo

We have more than 4 years experience in this field, which mainly trade in consulting services in Certificate of Origin.

shipping service in china: Malaysia Form A/Co & Indonesia Form BI/Form A & India Co/ Bengal Form A

to Europe /Turkey/USA/Venezuela/Brazil/Argentina/Jordon/Egypt etc...

Send your message to this supplier

Ms. rainnie ling
[View Supplier's Website](#)
[Add to My Contacts](#)

-Enter between 20 to 3,000 characters, English only.

[Send](#)

Sourcing Products & Suppliers on Alibaba.com

Search Products
Enter the product you are looking for in the **Search Bar** and click **Search**

Contact Suppliers
Click **Contact Now** to send an inquiry or **I'm online, Chat now** to chat online

Check Messages
Check quotes & messages from suppliers in your email inbox or Message Center
[Click here to learn more](#)

Related Products

shipping service in china
shipping service in china:Avoid high duty& tax or Anti-dumping duty Service: Malaysia/ Indones Form A/ CO & India CO/Bengal Fo

shipping agency in china
shipping agency in china:Avoid high duty& tax or Anti-dumping duty Service: Malaysia/ Indones Form A/ CO & India CO/Bengal Fo

shipping agent from Oman to China
With our agents support in Indonesia and skilled staffs, enables us to provide tailor-made and efficient service.
Min. Order: 1 Cubic Meter/Cubic Meters

shipping company
---shipping company from singapore to Japan --- SITC/SINOTRANS competitive rate

[View more](#)

Related Searches: [shipping service in china](#) [in floor china safes](#) [ship in the bottle](#) [ship in picture frame](#)

Want to find the right supplier? [Post a Request for Quotation now!](#)

[Email this page](#)
[Bookmark this page](#)
[Print this page](#)

Company Information - Site Map - Partnerships

Buy - Sell - My Alibaba - Community - Trade Shows - Safety & Security - Help - Contact Us

Browse by: Manufacturers - Wholesalers - China Gold Suppliers - All Products - Countries - Importers - Buying Leads - China - UK - Australia

Alibaba Group: Alibaba China - Alibaba International - AliExpress - Alibaba Japan | Taobao | Alipay | Yahoo! China | Koubei.com | AliSoft

Product Listing Policy - Intellectual Property Policy and Infringement Claims - Privacy Policy - Terms of Use

Copyright © 2008 Alibaba.com. All Rights Reserved.

China Trade Leads

Service to Avoid the Anti-Dump Tax Import from China

Search

[Home](#) > [China Service](#) > [China Commercial Service 3](#) > Service to Avoid the Anti-Dump Tax Import from China

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 (OC.: (BL, 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/Colombia.
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 Bike fittings from China to Europe.
8. Service to avoid this anti-dump tax import Energy-saving lighting from China to Europe.

Pls do not hesitate to contact me if need this kind of service.

[Bill of Lading Forms](#) www.JJKeller.com

Comply with DOT & EPA Regs. Hazmat, Straight Bill of Lading & Supplies.

[Freight Forwarding](#) www.FreightForwardIntl.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.tradecard.com

10 ways to counter rising costs of labor and materials overseas



Ads by Google

[Shenzhen Commercial Service](#) [China Commercial Service](#) [Exporters Shenzhen](#) [Exporters Shenzhen](#) [Exporters 13](#) [Dyna International Shipping Limited](#)

[Sourcing Services For African Clients](#) [Google Left Rankings](#) [QC Inspection Service](#) [Agent Service \(China\)](#) [Organic Production Certification](#) [New Sample/Product Design \(BTM-2\)](#) [Private Detective](#) [Commercial Investigation](#) [Outward Processing Arrangements](#) [Final Random Inspection \(FRI\)](#) [Bill of Lading - Packing Machine](#) [China Presence](#) [Export Agent In Yiwu China](#) [Project Coordination Services](#) [Acting As Drop Shipper And Offer Drop Shipping Service](#) [Website Design/Web Application/Flash Design](#) [LFGB Certification](#)

Service to Avoid the Anti-Dump Tax Import from China

Search

© 2008-2009 China Trade Leads - Chinese B2B Import & Export Directory

Generated by ACA HTML Converter Trial Version

Source: <http://china-trade-leads.com/china-service/china-commercial-service-3/service-to-avoid-the-anti-dump-tax-import-from-china>



[Sign In](#) | [Join Free](#) | [Community](#) | [Inquiry Basket \(0\)](#) | [Help](#) |

[Buy Now](#)

[Sell Now](#)

[Services](#)

[My EC21](#)

[Home](#) > [Buy Now](#) > [Entrepot Logistics Shanghai](#)

[> HOME](#)

[Company Profile](#)

Contact us
 Entrepot Logistics Shanghai
 [China]
Address:
 road siping 356 Shanghai
 Shanghai China
Phone:
 86-21-55159001
Contact name:
 kirk
[Inquire Now >](#)

Entrepot Logistics Shanghai

About Us

[Inquire Now >](#)

We provide via 3rd country bonded area logistics with CO, FORM A to evade anti-dumping duties in your country. MSN entrepot-logistics (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, espacially 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 anti-dumping if ...

[Read More](#)

Company Profile

[More](#)

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, yarns, polyester

[Industrial Supplies](#) Industrial Distribution Group available on-line and in stock! [www.idg-corp.com](#)

[Contract Manufacturer](#) SMT, Through-Hole, Mixed, RoHS. 50 years experience. Service focus. [www.qcirouits.com](#)

[TradeTang China Wholesale](#) Made in China Products Distribution for Wholesale,Drop Shipping,Retail [www.TradeT.](#)

Ads by Google

Share : [Like](#) | [Tweet](#) 0 | [Delicious](#) | [Google](#) | [Favorite](#) | [My EC21](#) | [Email this page](#) | [TOP](#)

[Home](#) | [Buy Now](#) | [Sell Now](#) | [Services](#) | [My EC21](#) | [Help](#) | [Community](#)

[About Us](#) | [Advertise with Us](#) | [Agent Program](#) | [Site Map](#) | [Contact Us](#) | [Country Search](#) | [Premium Suppliers](#)

[Terms & Conditions](#) | [Privacy Policy](#) | [Online Trading Risks](#) | [EC21 Mobile Web](#)

[中文](#) | [繁體](#) | [한국어](#) | [日本語](#) | [Español](#) | [русский](#) | [Français](#) | [Deutsch](#)

Hot Products: [A](#) | [B](#) | [C](#) | [D](#) | [E](#) | [F](#) | [G](#) | [H](#) | [I](#) | [J](#) | [K](#) | [L](#) | [M](#) | [N](#) | [O](#) | [P](#) | [Q](#) | [R](#) | [S](#) | [T](#) | [U](#) | [V](#) | [W](#) | [X](#) | [Y](#) | [Z](#)

Copyright (c)1997-2010 EC21 Inc. All Rights Reserved. [EC21 in Korean](#) | [Chinese](#)

Generated by ACA HTML Converter Trial Version

Source: <http://united5.en.ec21.com>



Member Login

Username or e-mail: *

Password: *

[» Create New Account](#)
[» Request New Password](#)

Transshipment, Help You Avoid Anti-Dumping Duties

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

[Ads by Google](#)
[Air Freight](#)
[Sea Freight](#)
[China Import](#)
[China EC](#)
[Import Goods](#)

Company: **EVERSKY 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 at 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 is 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 Post.

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

[Ads by Google](#)
[Export China](#)
[Sanli China](#)
[China Co LTD](#)
[Import Duty](#)
[Export Goods](#)

Freight Forwarding

Use our free freight service quotes and compare dozens of companies.
myFreight.com

Freight Forwarding

Reliability, Service, Low Prices Across the Globe - Air, Land, & Sea
www.FreightForwardIntl.com

Freight Audit and Payment

Freight Bill auditing and payment Logistics Management Professionals
www.nvisionglobal.com

Freight Clearance Services

Call Us for a Nationwide Customs Broker With 30 Years Experience.
www.RealPages.com/GuyLichtenstein



Ads by Google

Gateway

Global Standard Service

GATEWAY CONTAINER LINE CO.,LTD

Set Home | Favorites | Chinese Version

Home

Introduction

News

Cargo track

Shipping know

Branch

Contact us

welcome to Gateway

Cargo track

Select

Shanghai

Ningbo

Qindao

Dalian

Tianjin

Xiamen

Shenzhen

Guangzhou

Ningbo Advertisir

Branch introduced

Our Business:

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

FCL Export Business:

Take the advantage of preferential contracts with HANJIN, 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 Mid-east Persian Gulf lines to ports Dubai, Abu Dhabi, B. Abbas, Bahrain, Dammam, Doha, Kuwait and Muscat. Simultaneously, we also offered competitive rates.

Bulk Cargo Export Business:

Being export large machinery and autos 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 world wide are new able to trace their cargos on ship 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.

Generated by ACA HTML Converter Trial Version

Source: <http://www.gateway-group.cn/en/related.htm>

Home > Buy Now > Metals > Screws, Bolts, Nuts, Pins, Springs > **View Trade Leads**

Export Compliance System Export Customs Compliance Software Request A Free Product Demo Today! [www.kew](#)

Fasteners: All Types Over 75,000 Items Listed on Website Buy Online or Call 1-800-222-0324. [www.MutualScrew.com](#)

Steel Buildings on Sale 70% Off on Clearance Inventory Limited Time Only, Free Quote Here! [www.SteelMasterUSA.com](#)

Ads by Google

SELL

TRANSHIPMENT PROJECT TO AVOID ANTIDUMPING TAX

Posting Date : Feb 20, 2009 GMT

No Image

Company: Globe Success International Transportation (Shenzhen) LTD

Membership: Free Member since Feb 20, 2009

Country/Region: China

Address: 18FL, Oversea Friendship Building, 12#, Yingchun Road, Luohu, shenzhen, Guangdong, China 510800

Contact: **Ms. ANNA LEE**

Phone: 86-755-8214-5702

Fax: 86-755-8230-7954

Mobile: 86-1371-4045-400

Tags: TO AVOID ANTIDUMPING TAX

[Contact Now](#) [Add to Cart](#) [BOOKMARK](#) [Facebook](#) [Twitter](#) [Google+](#)

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

Export Compliance System
Export Customs Compliance
Software Request A Free Product
Demo Today!
[www.kewll.com](#)

Fasteners: All Types
Over 75,000 Items Listed on
Website Buy Online or Call 1-800-
222-0324.
[www.MutualScrew.com](#)

Ads by Google

TRANSHIPMENT PROJECT TO AVOID ANTIDUMPING TAX

1) In order to save the antidumping 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' port(this can be in Malaysia, Singapore, Indonesia, Bangladesh, Philippine, India, etc.) and issue the third country document to ship the goods to the final destination country.

A. antidumping goods export from China to USA:

a. fastener, thread rod, steel hangers, locks, bed room wooden furniture, etc.

B. antidumping goods export from China to Europe:

a. fastener, thread rod, leather shoes, bicycle and energy saving lamp, etc.

C. Antidumping goods export from China to South America:

a. Hardware, garment, bicycle, tyre, etc.

D. antidumping goods export from China to Turkey:

a. Ironing board, garment, shoes, tile, ceramic etc.

E. other antidumping goods, just keep us inquired

2) Any further inquiry, just let us know below information, then we will provide our best project for the routine way and advice for yr choosing.

A. goods name(if any H.S CODE, it is better)

B. quantity

C. destination

D. shpt ready date—if any

E. yr special requirement—if any(such as transiting country, document, time, etc.)

Appreciated for yr further contact.

Best regards!

Anna Lee

Globe Success International Transportation (Shenzhen) LTD

SHENZHEN OFFICE

TEL: 86-755-82145702

FAX: 86-755-82307954

MOBILE: 86-13714045400

18FL, Oversea Friendship Building, No.12 Ying Chun Rd, Shenzhen, China.

Optional Information

- HS Code : 7318 Screws, Bolts, Nuts, Coach Screws, Screw Hocks, Rivets, of Iron or Steel

Wholesale Dropshipping

Want To Be An Online Retailer? We Offer

Access To 1,000,000 Products.

[www.Doba.com](#)

TradeTang China Wholesale

We Offer Connections to 3,000,000 China

Manufacturers, Top Quality

[www.TradeTang.com](#)

Air Export Service

Reliable worldwide logistics airfreight

solutions.

[www.supflr.com](#)

Polymer Manufacturing

WV: Home To Innovative Co-location

Opportunities for Polymer Companies

[www.chemicalsww.com](#)

[Facebook](#) [Twitter](#) [Google+](#)

Ads by Google

Contact Information

Ms. ANNA LEE

(transhipment dept.)

[Contact Now](#)

Company : Globe Success International Transportation (Shenzhen) LTD

Address : 18FL, Oversea Friendship Building, 12#, Yingchun Road, Luohu, shenzhen, Guangdong, China

Zip/Postal : 510800

Telephone : 86-755-8214-5702

Fax : 86-755-8230-7954

Mobile : 86-1371-4045-400

[Email this page](#) [BOOKMARK](#) [Facebook](#) [Twitter](#) [Google+](#)

Home - For Buyers - For Sellers - My Trade Office - Biz Support - Trade Mall - YES TRUST - PR News - Help

Site Map - About Us - Advertisement - Partnership - Contact EC Plaza - Premium Suppliers - Hot Shakers

Hot Keywords : A | B | C | D | E | F | G | H | I | J | K | L | M | N | O | P | Q | R | S | T | U | V | W | X | Y | Z

Terms of Use - Privacy Policy - Anti-Spam Policy - Safe Trading Tips

Ranked as the most popular site in B2B Marketplace by [Alexa](#) and [YouToo!](#)

© Since 1996 EC Plaza Network. All Rights Reserved. EC Plaza Network. SINGAPORE, CHINA, JAPAN

Generated by ACA HTML Converter Mail Version

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



Henan JinShui
Cable
Group Co., Ltd.



Home	Product Directory	Offer Board	Virtual Office	Buyer Service	Info Centre	Audited Suppliers
<input type="text"/>				By Product	All Categories	<input type="button" value="Search"/> Advanced Search

Home » Member Showroom

Member Showroom

Member Home

[Company Info](#)
[Product List](#)
[Offer List](#)
[Contact Details](#)
[Index](#)
[Send Inquiry](#)

★ Add to Company Favorites

👍 Recommend to friends

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 ~ 50
 Business Scope: Service
 Member Since: 2009
 Last Sign In Date: 2010-09-29

Product List

Product Name	Update Date
Export Via A-Third-Country Against The Anti-Dumping Policy	2010-07-05
Customs Clearance in Russia or Ukraine	2010-01-18

🔗 Related Category: [Service](#) » [Commercial Service](#)

Contact Details



Pulinktrans

Company Name: Pulinktrans China Ltd.
 Company Address: Room 206, 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:

Fax Number:

Please [sign in](#) to view contact details

Homepage:

Mobile:

Contact Person
 (Department): Mr. Zhang(Re-Export Department)

Click here to send inquiry

🔗 Disclaimer

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](#)

[Home](#) - [Promotion](#) - [FAQ](#) - [Help](#) - [Privacy Policy](#) - [Terms & Conditions](#) - [Declaration](#)
[日本語](#) [Français](#) [Español](#) [Deutsch](#) [Português](#) [Italiano](#) [Русский язык](#) [한국어판](#) [عربية منصة](#) [भारतीय](#)
Our Products: [Made-in-China.com](#) - [MIC Mobile](#) - [中国制造网中文站](#) - [领动 \(Leadong\)](#) - [商聚园 \(Shangjuyuan\)](#) - [爱聘才 \(Ipincai\)](#) - [焦点视界 \(Focus Vision\)](#)

Copyright © 2010 Focus Technology Co., Ltd. All rights reserved.

Your use of this website is subject to, and constitutes acknowledgement and acceptance of our [Terms & Conditions](#).

Generated by ACA HTML Converter Trial Version

Source: <http://www.made-in-china.com/showroom/realsh>

Welcome to Alibaba.com, Join Free | Sign In
Buy ▾ Sell ▾ Community ▾ My Alibaba ▾ My Favorites ▾ Help ▾

Global trade starts here.™

ProductsSuppliersBuyers

Buy on **AliExpress.com**

About 681013 results: Steel Pipes (455152), Stainless Steel Pipes (110348), Steel Sheets (190), Steel Round Bars (204)
Advanced Search

Home > Products > Minerals & Metallurgy > Steel > **Steel Pipes (947195)**

Language Options ▾

There are **681013** **seamless steel pipe** from **1733** **suppliers** on Alibaba.com

Related Searches: [seamless steel pipe](#), [seamless carbon steel pipe](#), [seamless stainless steel pipe](#), [seamless steel tube](#), [Wholesale seamless steel pipe](#)

See larger image: Third-country re-exports seamless steel pipe, magnet, carbon steel fasteners

[Add to My Favorites](#)

Third-country re-exports seamless steel pipe, magnet, carbon steel fasteners

FOB Price: [Get Latest Price](#)

Ms. lianheng SH

Send a Message to this Supplier

Supplier Details

Suzhou Yuncheng Ex/Im Co., Ltd.
(Jiangsu, China (Mainland))
Business Type:
Manufacturer, Trading Company
[Contact Details](#)
Gold Supplier (2nd Year)
A&V Checked

Online Showroom: 244 Products
Other Similar Products from this Supplier
[View this Supplier's Website](#)

Product DetailsCompany Profile

Report itemShare

Quick Details

Type: Other

Specifications

Third-country re-exports to reasonably circumvent anti-dumping duty

We are a Shanghai international integrated logistics company. Third-country re-exports to reasonably circumvent anti-dumping duty is one of our specialty business. Deeply & greatly, we are favored and trusted by companies or enterprise whose products are hindered to export. For this reason, if your product has met with anti-dumping and other trade barriers, we can provide advice and assistance, we are confident that our professional operational level will help to you. Hot Products: seamless steel pipe, carbon steel fasteners, alnico and several dozens of products.
Consultation Tel: 021-65079700

Ms. lianheng SH
[View Supplier's Website](#)
[Add to My Contacts](#)

Enter between 20 to 3,000 characters, English only.

Sourcing Products & Suppliers on Alibaba.com

Search Products
Enter the product you are looking for in the **Search Bar** and click **Search**

Contact Suppliers
Click **Contact Now** to send an inquiry or **I'm online, Chat now** to chat online

Check Messages
Check quotes & messages from suppliers in your email inbox or Message Center
[Click here to learn more](#)

Related Products

Third-country re-exports seamless steel pipe, magnet, carbon steel fasteners

Third-country re-exports to reasonably circumvent anti-dumping duty

[View more](#)

Related Searches: [seamless steel pipe](#) [seamless carbon steel pipe](#) [seamless stainless steel pipe](#) [seamless steel tube](#)

[Want to find the right supplier? Post a Request for Quotation now!](#)

[View More Related Items](#)

Email this pageBookmark this pagePrint this page

Company InformationSite MapPartnerships

Buy ▾ Sell ▾ My Alibaba ▾ Community ▾ Trade Shows ▾ Safety & Security ▾ Help ▾ Contact Us

Browse by: Manufacturers - Wholesalers - China Gold Suppliers - All Products - Countries - Importers - Buying Leads - China - UK - Australia
Alibaba Group: Alibaba.com | Alibaba China | Alibaba International | AliExpress | Alibaba Japan | Taobao | Alipay | Yahoo! China | Koubai.com | Alisoft
Product Listing Policy - Intellectual Property Policy and Infringement Claims - Privacy Policy - Terms of Use
Copyright © 2008 Alibaba.com. All rights reserved.



Jiangsu Dongfang Hydraulic Co., Ltd.
http://www.jyyeya.com



Home	Product Directory	Offer Board	Virtual Office	Buyer Service	Info Centre	Audited Suppliers
----------------------	-----------------------------------	-----------------------------	--------------------------------	-------------------------------	-----------------------------	-----------------------------------

By Product
All Categories
Search
Advanced Search

[Home](#) » [Member Showroom](#)

- [Member Showroom](#)
- [Member Home](#)
- [Company Info](#)
- [Contact Details](#)
- [Send Inquiry](#)
- ★ [Add to Company Favorites](#)
- 👍 [Recommend to friends](#)

Shanghai Wintrans Branch

We are a professional forwarder who can provide this entrepot 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 operated 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:

Please [sign in](#) to view contact details

Homepage:

Mobile:

Contact Person (Department): Mr. Henry

[Contact Now](#)
Click here to send inquiry

[Disclaimer](#)

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](#)

[Home](#) - [Promotion](#) - [FAQ](#) - [Help](#) - [Privacy Policy](#) - [Terms & Conditions](#) - [Declaration](#)

日本語 Français Español Deutsch Português Italiano Русский язык 한국어판 العربية منصة भारतीय

Our Products: [Made-in-China.com](#) - [MIC Mobile](#) - [中国制造网中文站](#) - [领动 \(Leadong\)](#) - [商聚园 \(Shangjuyuan\)](#) - [爱聘才 \(Ipincai\)](#) - [焦点视界 \(Focus Vision\)](#)

Copyright © 2010 Focus Technology Co., Ltd. All rights reserved.

Your use of this website is subject to, and constitutes acknowledgement and acceptance of our [Terms & Conditions](#).

Generated by ACA HTML Converter Trial Version

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

References

- U.S. Department of Commerce (DOC). AD/CVD Orders in Effect (excel spread sheet), updated August 12, 2010, available at <http://info.usitc.gov/oinv/sunset.nsf/AllDocID/96DAF5A6C0C5290985256A0A004DEE7D?OpenDocument>.
- U.S. International Trade Commission (USITC) (USITCa). *Certain Steel Nails from China*. Inv. No. 731-TA-1114 (Final), July 2008.
- USITCb. "Certain Steel Nails from China Injure U.S. Industry, Says ITC." Press release, July 9, 2008.
- USITCc. *Certain Lined Paper School Supplies from China, India, and Indonesia*. Inv. Nos. 701-TA-442-443 and 731-TA-1095-1097 (Final), September 6, 2006.
- USITCd. "Certain Lined Paper School Supplies from China, India, and Indonesia Injure U.S. Industry, Says ITC." Press Release, September 6, 2006.
- USITCe. *Light-Walled Rectangular Pipe and Tube from Turkey*. Inv. No. 731-TA-1121 (Final), May 2008.
- USITCf. "Light-Walled Rectangular Pipe and Tube from China, Korea, and Mexico Injure U.S. Industry, Says ITC." Press Release, July 17, 2008.
- USITCg. *Uncovered Innersprings Units from South Africa and Vietnam*. Inv. Nos. 731-TA-1141-1142 (Final), December 2008.
- USITCh. "Uncovered Innerspring Units from China Injure U.S. Industry, Says ITC." Press release, January 2009.
- USITCi. *Natural Bristle Paint Brushes from China*. Inv. No. 731-TA-244 (Second Review), November 2004.
- USITCj. *Oil Country Tubular Goods from China*. Inv. No. 701-TA-463 (Final), January 2010.
- USITCk. "Certain Oil Country Tubular Goods from China Injure U.S. Industry, says USITC." Press Release, December 30, 2009.
- USITCl. *Diamond Sawblades and Parts Thereof from China and Korea*. Inv. Nos. 731-TA-1092 and 1093 (Final), July 2006.
- USITCm. "Diamond Sawblades and Parts Thereof from China and Korea Do Not Injure U.S. Industry, Says USITC." Press Release, June 19, 2006.
- USITCn. *Steel Wire Garment Hangers from China*. Inv. No. 731-TA-1123 (Final), September 2008.
- USITCo. "Steel Wire Garment Hangers from China Injure U.S. Industry, Says USITC." Press Release, September 11, 2008.

References

USITCp. *Certain Steel Grating from China*. Inv. Nos. 701-TA-465 and 731-TA-1161 (Final), July 2010.

USITCq. “Certain Steel Grating from China Injures U.S. Industry, Says USITC.” Press release, June 24, 2010.