

ATTACHMENT 1



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

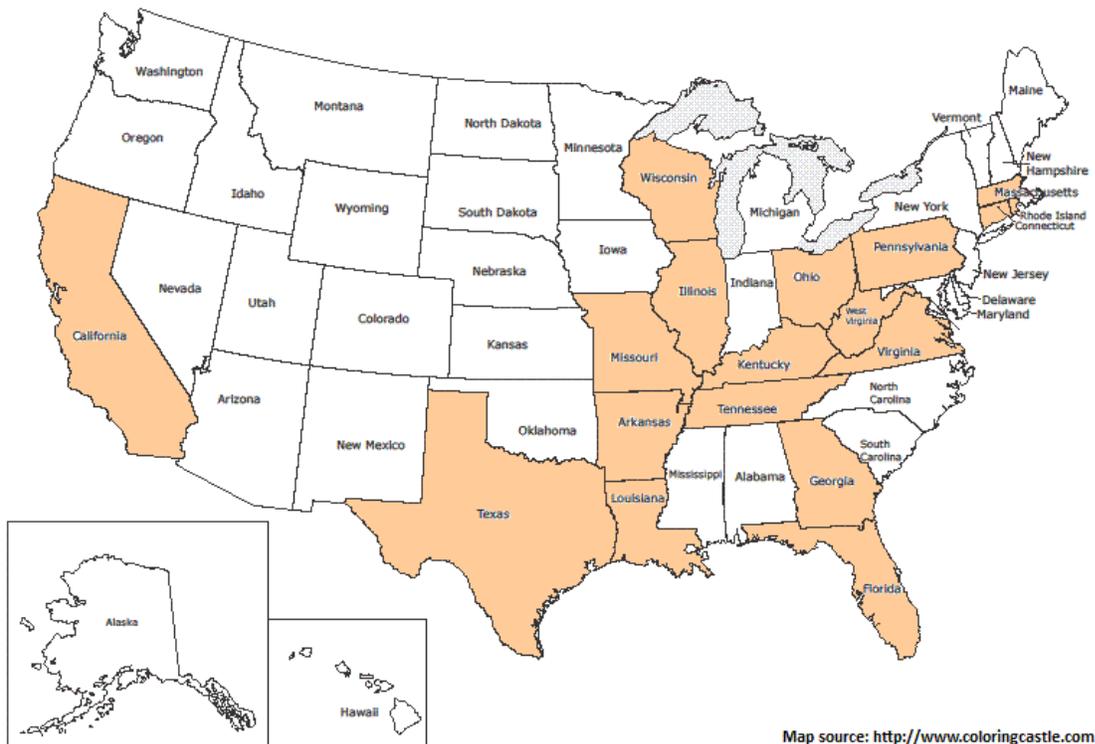
(DOC Case No. A-570-909)

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.,

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

Sent: Fri, September 3, 2010 8:36 AM

To: ***

Subject: Re: Concrete nail

Dear ***,

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

Regards,

Paul

Explanation:

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

Company A (cont'd)

From: ***

Sent: Sun, September 5, 2010 10:47 PM

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

Subject: Re: Concrete nail

Hi, dear Paul:

Thanks for your email.

We have exported our products to U.S but the customer avoid the duties by 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

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.

From: feedback@service.alibaba.com

To: ***

Sent: Tues, August 31, 2010

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

Dear ***,

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

Buyer's Message

Subject: Inquiry about your product

Dear sir:

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

Thank you,

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

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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

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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

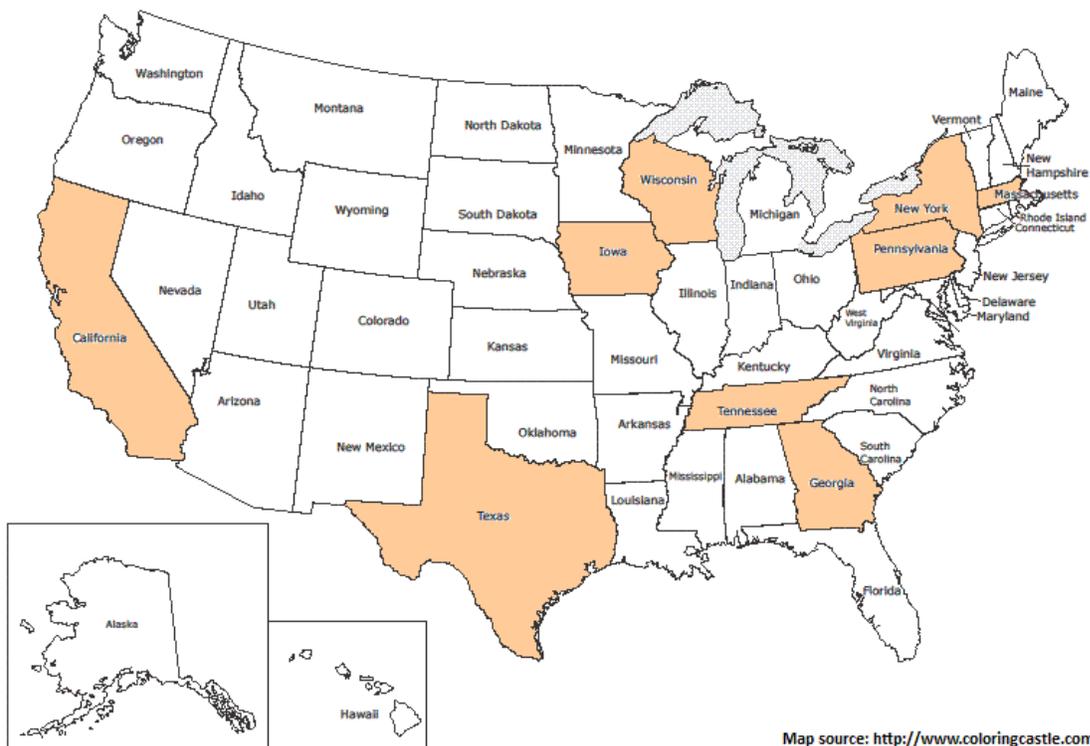
(DOC Case No. A-570-901)

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.

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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 welcome.

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

Looking forward to your soonly response.

Best regards,

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

Sent: Fri, September 3, 2010

To: ***

Subject: Re: Inquiry about your product

Dear ***,

Thank you for your response. [Is there any way to avoid paying the anti-dumping duties in your experience?](#)

Regards,
Paul

Explanation:

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

Company D (cont'd)

From: ***

Sent: Wed., September 8, 2010 5:44 AM

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

Subject: Re: Inquiry about your product

Dear Paul,

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

How do you think about this solution?

Looking forward to hearing from you soon.

Thanks & Best regards,

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

Sent: Wed., September 8, 2010 7:20 AM

Subject: Re: Inquiry about your product

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.

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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)

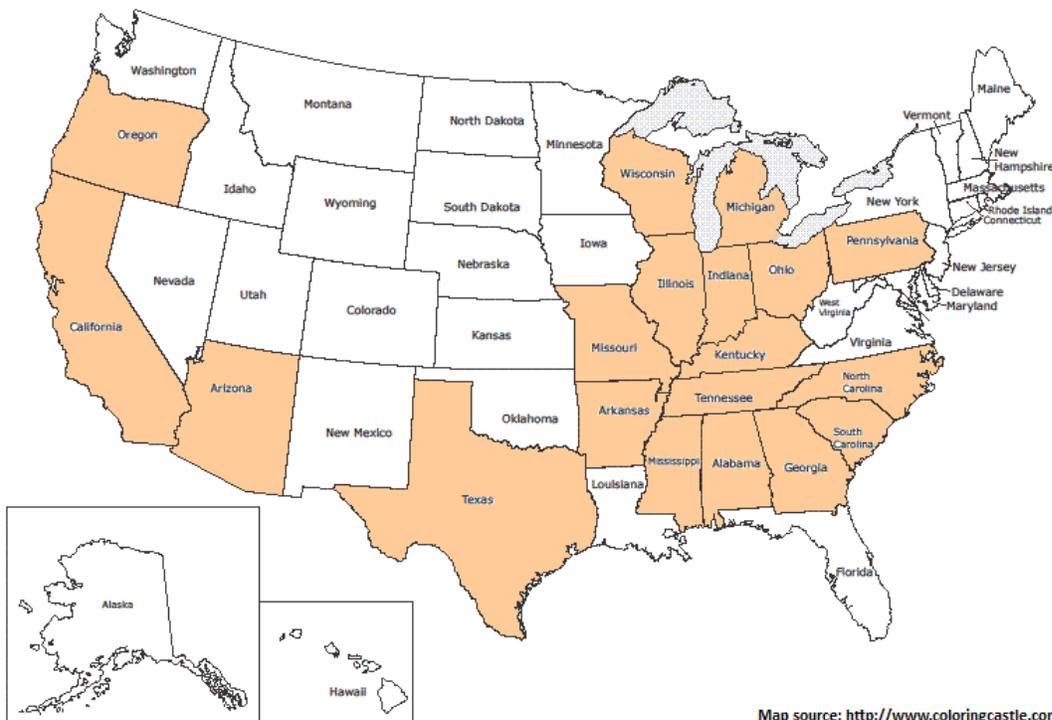
Carbon-quality welded light-walled rectangular pipe and tube is often referred to as ornamental or mechanical tubing. Principal uses include ornamental fencing, window guards and framing, and railings for construction and agricultural applications. It is also used in metal furniture, athletic equipment,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

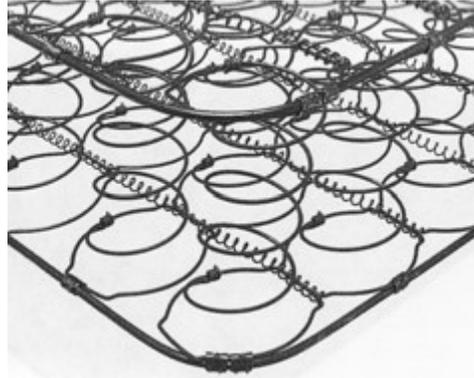
Uncovered Innersprings Units from China

(DOC Case No. A-570-928)

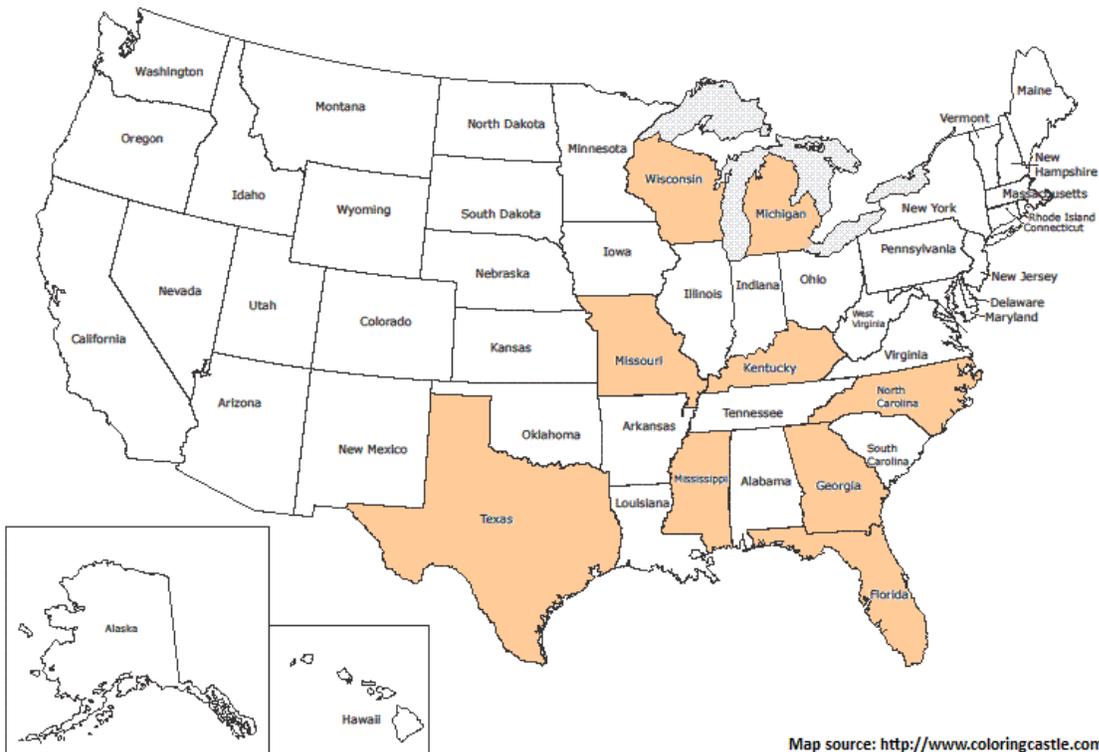
Uncovered innerspring units are composed of a series of individual metal springs joined together and used as the innerspring component in the manufacture of innerspring mattresses.

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.

ear 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 you 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 Inspection 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.](#)

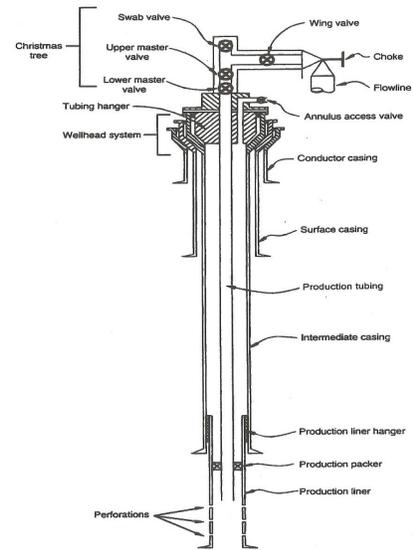
Explanation:

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)

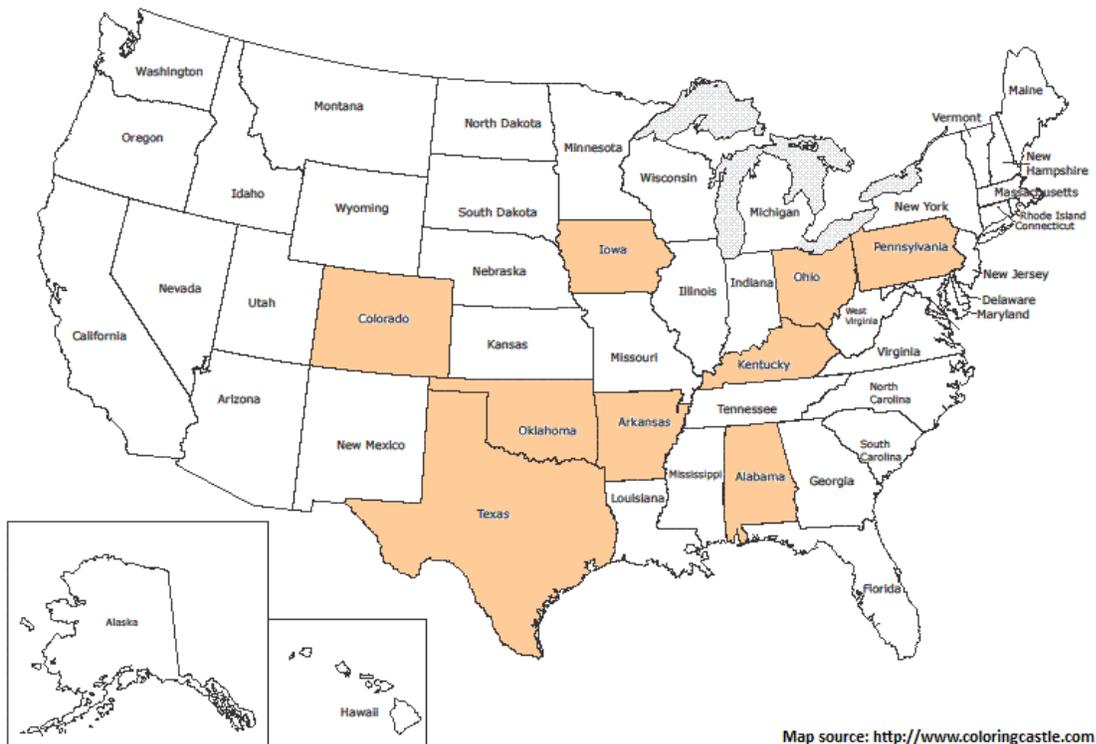
OCTG include carbon and alloy steel casing and tubing used in oil and gas wells. Casing is a circular pipe that serves as a structural retainer for the walls of the well. Tubing is installed inside the casing and is used to conduct the oil and gas to the surface.



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



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)

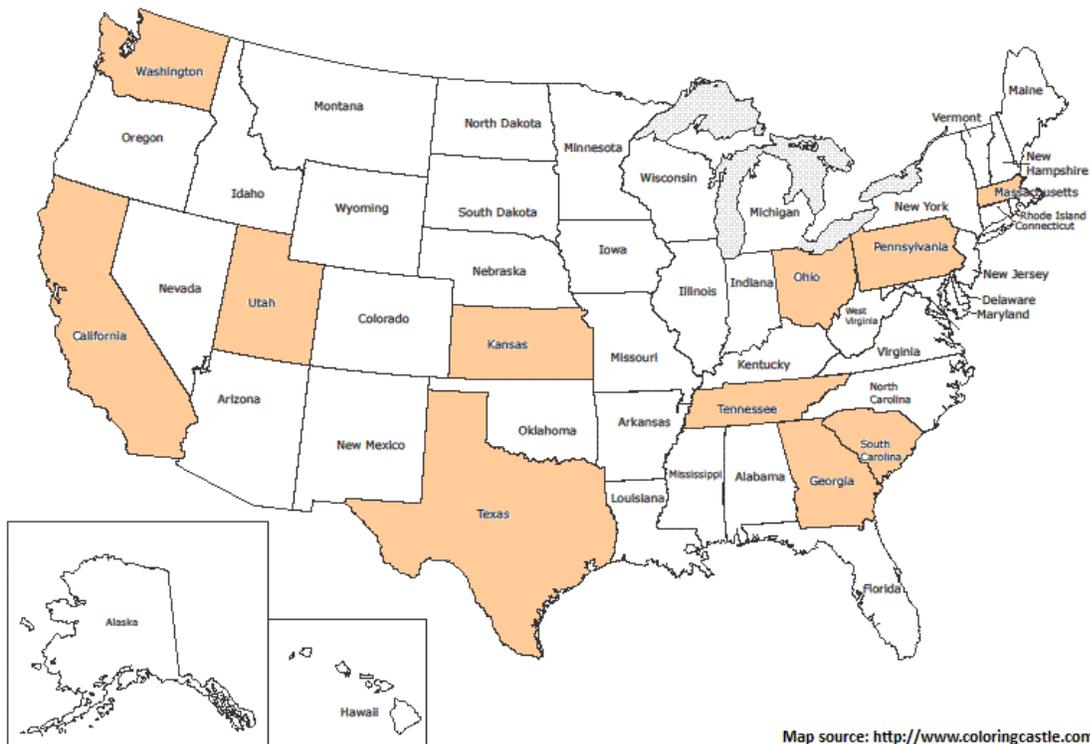
Diamond sawblades are circular cutting tools that have numerous functions and applications for cutting, ranging from cement, asphalt, marble, and tile, to masonry work such as brick and stone.



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

From: ***

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

To: ***

Subject: Re: Diamond Blades

Explanation:

Company K engages in illegal transshipment to avoid paying duties.

Hi ***,

Thanks for getting back to me.

[No, we are not affected by the anti-dumping as we can do trans-shipment.](#)

Regards,

Steel Wire Garment Hangers from China

(DOC Case No. A-570-918)

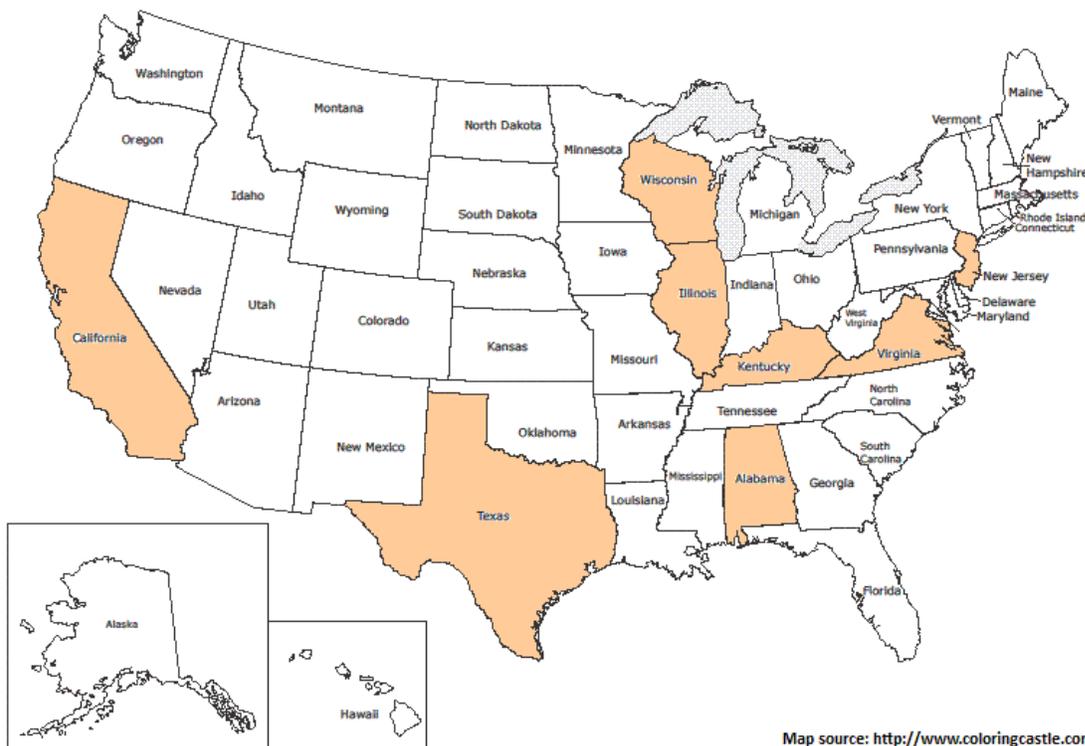
Steel wire garment hangers are produced primarily for use by the dry cleaning, industrial laundry, textile, and uniform rental industries.

Industry at a Glance:

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



U.S. Production Locations of Steel Wire Garment Hangers



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

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

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

Company L

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

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

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

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

Best regards,

Explanation:

Company L offers to ship containers to the United States via Taiwan or Malaysia. Although not explicitly stated in this email, the motive for shipping through a third country is to avoid paying duties.

Company M

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

From: ***

Sent: Friday, April 09, 2010 9:27 PM

To: ***

Subject: Re: RE: RE: Re: Re: Hanger Business

Yes, the tariff rate is high. However, we are not extinct because of it.

We keep a solution for our friends. It is benefit for us and our client. Both have made profit from it.

We do not know how much profit you can make from working with wells. In China, yes, wells' tariff rate is the lowest in china.

It is about 16%. He is the only one company for the first rank. Our factory is of the second rank.

However, we still alive. "Fact speaks louder." Our clients also make profit working with us.

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

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

A trial order may make you know much about us.

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

Explanation:

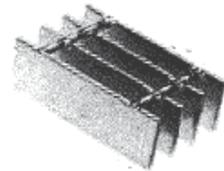
Company M offers to illegally ship product through a third country to avoid paying duties. As stated by Company M, this service is offered to "our friends" and that illegal transshipment "is a benefit for us and our client."

Steel Grating from China

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

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

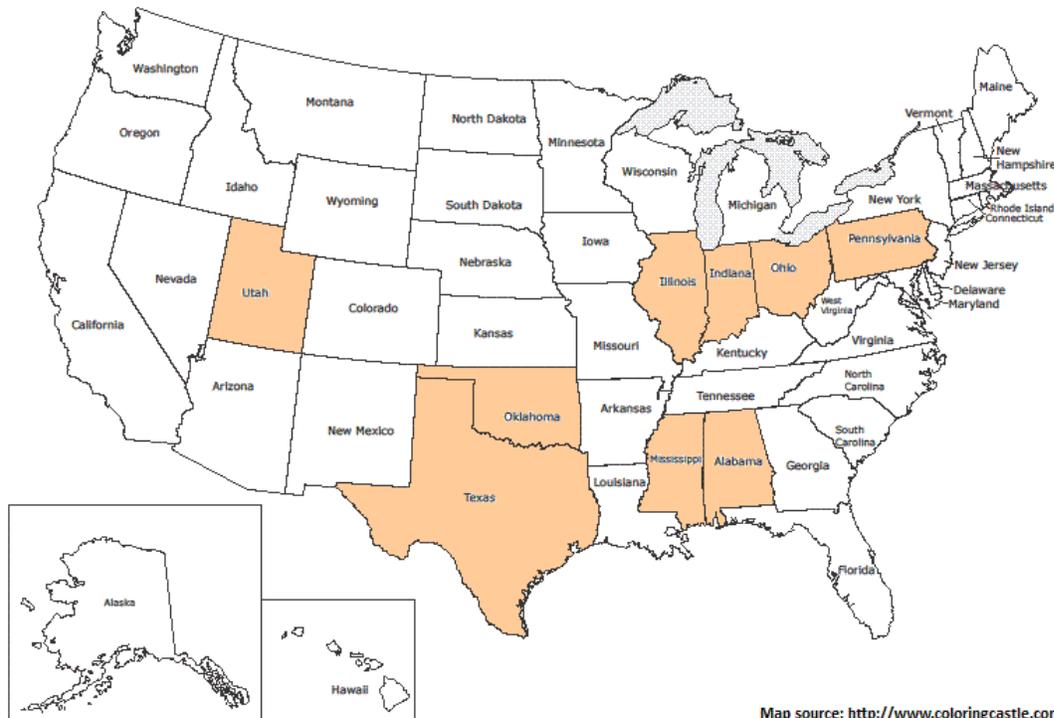
Steel grating is designed to support and distribute the weight of objects. Common end uses include walkways, mezzanines, catwalks, fire escapes, stairways, and flooring.



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.cm Shenzhen Wintrans Logistics Co., Ltd. Luohu District, Shenzhen City, Pacific Business Building, B1402, Shenzhen, Guangdong, China Shanghai Wintrans Branch Siping Road, 188 2108, Shanghai China
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.lasurex.com http://www.alibaba.com/product-gs/282892965/sea_freight.html http://lasurex.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



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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.
C: +86 0755 25565280
Fax: +86 0755 25561580
Cell: +86 13818671486
Skype: kentchenxujun
Msn: kent@hanhen.com
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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

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Product Details Company Profile

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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

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

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Payment Terms: T/T

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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
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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 B/Form A & India Co/ Bengal Form A

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shipping company
---shipping company from singapore to Japan ---
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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.
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Contact us

Entrepot Logistics Shangha
i
[China]

Address:
road siping 356 Shanghai
Shanghai China

Phone:
86-21-55159001

Contact name:
kirk

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Entrepot Logistics Shanghai

About Us

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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 ...

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Company Profile

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- 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

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Transshipment, Help You Avoid Anti-Dumping Duties

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Website: [Http://Www.re-Export.net](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

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The screenshot displays the website for Gateway Container Line Co., Ltd. The header includes the company logo, name, and navigation links. The main content area features a 'Cargo track' sidebar and a 'Branch introduced' section with detailed business descriptions.

Gateway
Global Standard Service

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Cargo track
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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 now 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.

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

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

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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

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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

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Polymer Manufacturing
WV: Home To Innovative Co-location Opportunities for Polymer Companies
[www.chemicalsw.com](#)

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Contact Information

Ms. ANNA LEE [Contact Now](#)
(transhipment dept.)

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

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Henan JinShui
Cable
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Pulinktrans China Ltd.

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

- Sea, air, rail transportation, import and export booking, customs clearance, warehousing, storage and other traditional services.
- To circumvent anti-dumping, a third country of transit transport, while providing many products such as certificates of origin and embassy endorsement.
- 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:

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

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

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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

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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 speciality 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

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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:

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Mobile:

Contact Person (Department): Mr. Henry



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ATTACHMENT 2



Highway Freight Consulting Ltd >>>

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- LCL, Bulk and Project Cargo Service;
- B/L Risk Control

Textile Logistics

We know Europe canceled China quota in 2008 and US government in 2009, But since there are still trade barriers in some countries which makes shippers and consignees unhappy. Luckily we now have had our personal solution through the past experience.

Anti-dumping Logistics

China has become the world's factory acting as the biggest exportation country around the world. As a result many countries set up some Anti-dumping policy to restrict import from China, which deeply hurt trading cooperation between importers and exporters with highly cost. In this regards, doing third country documents and transfer shipment may save you great cost for your business.

Bond Logistics

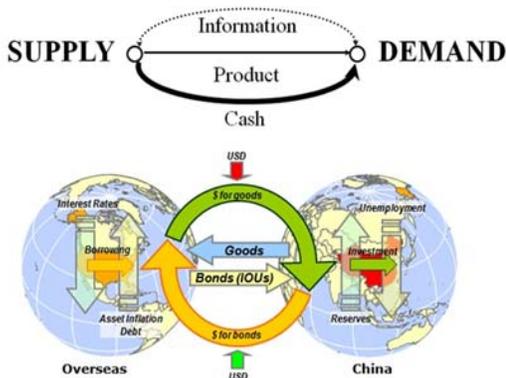
With trade development, Many of client try to find ways to cut cost and delivery time. Bond logistics is a good choice for you where you can storage your cargo safely under small cost, it can help you fast custom brokerage, save you detention and demurrage in port, make your goods here as a distribution center etc. Find us, find your way, find your money.

Custom Brokerage

Custom brokerage is acting as a more and more important part in global supply chain. Sometimes you have to have good relationship with custom to make your goods import and export smoothly. Sometimes you need to do something special to have your tax draw back in time, Sometimes you have to get it done for your on time delivery, Sometimes this may help you save large cost. That is why Shenzhen port is different from other ports in China. Listen, Think, Deliver.

Supply Chain Solution

The global network used to deliver products and services from raw materials to the end customer through engineered flows of information, physical distribution and cash.



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WE JUST TAKE LIBERTY TO WRITE TO YOU MAINLY IS PREFER TO SEE IF WE CAN SAVE SOME COST IN YOUR TRADING ROUTE. WE THANK YOU FOR YOUR TIME TO READ OUR LETTER BELOW. WE THINK IT WILL BE A HELP SOMEWHERE YOU WILL AGREE IN THE FUTURE.

FIRST OF ALL, AS TOO MANY HONGKONG FACTORY/TRADING COMPANY HAVE MOVED THEIR INDUSTRIAL PORTION TO MAINLAND, JUST LIKE YOU. HOWEVER, AS YOU HAVE LONG RELATIONSHIP WITH HONGKONG FREIGHT PARTNER OR GET HABIT TO MOVE YOUR GOODS THROUGH HONGKONG, DESPITE YOU KNOW THIS IS NOT A COST EFFECTIVE SOLUTION FOR YOU. IN THIS LETTER, WE JUST INTRODUCE OUR SERVICE BELOW, WE BELIEVE THAT YOU CAN GET A SUPPORTIVE HAND WHERE FM US.

1. COMPETITIVE RATES FOR GOODS EX SEA & AIR THROUGH YANTIAN /CHIWAN/SHENZHEN AIR PORT TO WORLDWIDE DESTINATIONS.

2. IF YOU DON'T HAVE CUSTOMS DOCUMENT FOR NORMAL GOODS IMPORT /EXPORT AIR/SEA/CROSS BORDER TO/FROM CHINA MAINLAND, PLEASE CONTACT US.

3. TAX SAVING SOLUTIONS FOR SAMPLES, LITTLE LOT NORMAL GOODS, TAX DRAWBACK SOLUTION FOR RAW MATERIAL BUYING IN MAINLAND.

4. CHINESE/TAIAND/MALAYSIA..ETC FORM-A C/O FOR SHOES, ENERGY SAVING LAMP..ETC IMPLEMENTED BY ANTI-DUMPING TAX EXPORT TO CONTRIES UNFRIENDLY TO CHINA.

5. IMCO, DANGEROUS GOODS SHIPPING EXPERIENCED TO FIREWORKS, LIGHTERS, CHEMICALS.

6. LOGISTICS WAREHOUSE SERVICE, COMPETITIVE RATES FOR DOMESTIC TRUCKING SERVICE.

7. IMPORT FM ANY CORNER OF THE WORLD TO ANYWHERE OF MAINLAND SEA & AIR. WE ARE A SHENZHEN BASED FREIGHT FORWARDER WITH NETWORK COVERING THE WHOLD WORLD. WE HAVE REGULAR GOOD RELATIONSHIP WITH AFFILIATED PARTNERS AND CUSTOMS BROKERS IN PEARL DELTA REGIONS AND XIAMEN, SHANGHAI, QINGDAO, DALIAN, BEIJING..ETC.

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- Recreational Boat >> Transportation
- Container >> Transportation
- Other Vehicles >> Transportation

[Selling Categories]

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- Aircraft >> Transportation
- Recreational Boat >> Transportation
- Container >> Transportation
- Other Vehicles >> Transportation

[keyword]

FORWARDER , INTERNATIONAL CARGO

Registration Date	2004/10/26 (Year/Month/Date)
Buyer / Seller in EC21	Both
Business Type	Agent
Year established	2000
Employees total	51 - 100
Annual revenue	USD 50,000,001 - 100,000,000

Contact Information

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Company	EASTERN START LOGISTICS LTD
Address	RM 422,BUILDING 1,RONGCHAO GARDEN,BUJI,SHENZHEN,CHINA Shenzhen Guangdong 518112 China
Phone	86 - 755 - 28587711
Fax	86 - 755 - 28582183
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ATTACHMENT 4

GAO

Report to the Ranking Member,
Subcommittee on Oceans, Atmosphere,
Fisheries, and Coast Guard, Committee
on Commerce, Science, and
Transportation, U.S. Senate

February 2009

SEAFOOD FRAUD

FDA Program Changes and Better Collaboration among Key Federal Agencies Could Improve Detection and Prevention



GAO

Accountability * Integrity * Reliability



Highlights of [GAO-09-258](#), a report to the Ranking Member, Subcommittee on Oceans, Atmosphere, Fisheries, and Coast Guard, Committee on Commerce, Science, and Transportation, U.S. Senate

Why GAO Did This Study

In 2007, Americans consumed almost 5 billion pounds of seafood. Most seafood buyers, at many levels—importers, distributors, supermarkets, restaurants, and individual consumers—assume that the seafood they buy is what the seller claims it is. However, this is not always the case. Sometimes seafood products are mislabeled for financial gain—an activity called seafood fraud. Three federal agencies play key roles in detecting and preventing seafood fraud: the Department of Homeland Security's Customs and Border Protection (CBP), the Department of Commerce's National Marine Fisheries Service (NMFS), and the Department of Health and Human Services' Food and Drug Administration (FDA). GAO was asked to determine (1) the actions key federal agencies take to help detect and prevent seafood fraud and (2) the extent to which these key federal agencies collaborate with each other to help detect and prevent seafood fraud. GAO reviewed data and documents from each agency on actions to detect and prevent seafood fraud, and interviewed agency officials and other key stakeholders.

What GAO Recommends

GAO is making recommendations to CBP, NMFS, and FDA that are intended to help reduce the prevalence of seafood fraud, increase interagency collaboration, improve information sharing, and reduce overlaps. In commenting on a draft of this report, CBP, NMFS, and FDA generally agreed with the recommendations.

To view the full product, including the scope and methodology, click on [GAO-09-258](#). For more information, contact Lisa Shames at (202) 512-3841 or shamesl@gao.gov.

SEAFOOD FRAUD

FDA Program Changes and Better Collaboration among Key Federal Agencies Could Improve Detection and Prevention

What GAO Found

CBP and NMFS conduct several activities to help detect and prevent seafood fraud, but FDA told GAO that it focuses on food safety and undertakes few fraud-related activities. Nonetheless, fraud can result in food safety problems. For example, fish that was mislabeled as a different species for financial gain has caused illnesses due to the presence of a potentially deadly toxin.

- CBP reviews seafood import documentation to detect schemes to avoid paying the appropriate customs duties as seafood products enter the country, among other things.
- NMFS addresses seafood fraud through its voluntary, fee-for-service inspection program, which includes inspecting seafood that retailers, among others, are purchasing to verify its net weight and ensure the species is correctly identified. According to NMFS officials, NMFS inspects approximately one-third of the seafood consumed in the United States.
- FDA examines only about 2 percent of imported seafood annually, and its primary seafood oversight program does not address economic fraud risks, which limits its ability to detect fraud. An FDA seafood fraud-related activity is the maintenance of a publicly available list of seafood names that is intended to help the industry correctly label products. However, until 2009, FDA had not fully updated the list it created in 1993 to reflect over 400 name changes. Finally, FDA's guidance to help seafood processors comply with its seafood oversight program does not reflect the seafood labeling requirement of the Food Allergen Labeling and Consumer Protection Act of 2004 to include the species of fish or shellfish on product labels. Because of the limited scope of FDA's seafood oversight program, its mismanagement of the Seafood List, and its failure to update its guidance to reflect the allergen labeling requirement, consumers have less assurance that the seafood they purchase is correctly labeled.

The federal agencies that share responsibility for detecting and preventing seafood fraud—CBP, NMFS, and FDA—do not effectively collaborate with each other. Specifically, they have not identified a common goal, established joint strategies, or agreed on roles and responsibilities. As a result, the agencies have not taken advantage of opportunities to share information that could benefit each agency's efforts to detect and prevent seafood fraud, nor have they identified similar and sometimes overlapping activities that could be better coordinated to use limited resources more efficiently. For example, each agency has its own laboratory capability for determining seafood species and uses different methodologies for creating standards for species identification. The result is that neither the laboratories nor the data developed in them are shared.

Contents

Letter		1
	Results in Brief	4
	Background	7
	CBP and NMFS Take a Variety of Actions to Detect and Prevent Seafood Fraud, While FDA Takes Few Actions Related to Seafood Fraud	13
	Limited Collaboration Exists among the Key Agencies Responsible for Detecting and Preventing Seafood Fraud	25
	Conclusions	30
	Recommendations for Executive Action	31
	Agency Comments and Our Evaluation	31
Appendix I	Scope and Methodology	34
Appendix II	Comments from the Department of Commerce	37
Appendix III	Comments from the Department of Health and Human Services	40
Appendix IV	Comments from the Department of Homeland Security	46
Appendix V	GAO Contact and Staff Acknowledgments	48
Table		
	Table 1: Types of Seafood Fraud That Federal Agencies Might Detect	2

Abbreviations

CBP	Customs and Border Protection
FDA	Food and Drug Administration
HACCP	Hazard Analysis and Critical Control Point
HHS	Department of Health and Human Services
ICE	Immigration and Customs Enforcement
MOU	memorandum of understanding
NFI	National Fisheries Institute
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NTAG	National Targeting and Analysis Group
USDA	U.S. Department of Agriculture

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United States Government Accountability Office
Washington, DC 20548

February 19, 2009

The Honorable Olympia J. Snowe
Ranking Member
Subcommittee on Oceans, Atmosphere, Fisheries,
and Coast Guard
Committee on Commerce, Science, and Transportation
United States Senate

Dear Senator Snowe:

In 2007, Americans consumed almost 5 billion pounds of seafood. Most seafood buyers, at many levels—importers, distributors, supermarkets, restaurants, and individual consumers—assume that the seafood they buy is what the seller claims it is. However, this is not always the case. Sometimes people mislabel seafood products for financial gain—an activity called seafood fraud. The most common types of seafood fraud are shipping products through an intermediary country to avoid customs duties (transshipping), adding excessive amounts of water or ice to the seafood to increase its weight (over-treating), substituting a different species of seafood for the species listed on the label (species substitution), including less seafood in a package than indicated by the label (short-weighting), and other types of mislabeling or misrepresenting of seafood products.

Although comprehensive information on the extent of seafood fraud does not exist, seafood industry officials believe that seafood fraud is a problem. The available information suggests that the scope and economic impact of seafood fraud vary widely and can occur at any point in the seafood supply chain, from large-scale, multinational schemes involving importers—with impacts in the millions of dollars—to fraudulent activities at individual restaurants or grocery stores. Seafood fraud can have both food safety and economic consequences. For example, seafood fraud affected food safety in 2007 when imported puffer fish, which contains a potentially deadly toxin, was mislabeled as monkfish, and people became ill. Another example of fraud is including the ice-glaze covering used to freeze and preserve fish fillets in the net weight of the product, which has primarily an economic impact because consumers get less fish than they paid for. Seafood fraud can undermine consumer confidence in the U.S. seafood supply, over 80 percent of which is imported.

Three federal agencies play key roles in detecting and preventing seafood fraud: the Department of Homeland Security’s Customs and Border Protection (CBP), the Department of Commerce’s National Marine Fisheries Service (NMFS), and the Department of Health and Human Services’ Food and Drug Administration (FDA). CBP collects customs duties on imports, including seafood, and seeks to prevent the evasion of customs duties. Goods imported into the United States may be subject to duties on the basis of their product type, value, and country of origin, among other things. In addition, to limit the sale of foreign-made products in this country at less-than-normal value, called “dumping,” some imported goods are also subject to antidumping duties. NMFS provides fee-for-service inspection services on request to the seafood industry, including processors, distributors, and other firms. These inspections can address economic integrity issues, such as the accuracy of a seafood product’s label, as well as seafood safety issues. Finally, FDA is responsible for ensuring that the nation’s food supply, including seafood, is safe, wholesome, and properly labeled. To that end, FDA is authorized to issue regulations to enforce the Federal Food, Drug, and Cosmetic Act. The act prohibits the misbranding or adulteration of food products, which would include the mislabeling and substituting of seafood products that constitute seafood fraud. FDA is responsible for seafood that is imported into the United States as well as seafood that is harvested and processed domestically. FDA inspects U.S. importers and domestic and foreign processors to ensure their compliance with applicable requirements, including labeling requirements and FDA’s Seafood Hazard Analysis and Critical Control Point (HACCP) regulations. The HACCP regulations require seafood processors to identify and develop processes to mitigate biological, chemical, and physical hazards that are likely to occur. FDA also provides guidance to the seafood industry on the naming of seafood products and on food safety hazards. Table 1 shows the types of seafood fraud that these three agencies might detect when performing their authorized roles.

Fraud type	CBP	NMFS	FDA
Transshipment to avoid duties	✓		
Over-treating		✓	✓
Species substitution	✓	✓	✓
Short-weighting		✓	✓
Other mislabeling or misrepresenting	✓	✓	✓

Source: GAO analysis of documents obtained from and discussions with CBP, NMFS, and FDA.

When an issue crosses federal agency lines, as seafood fraud does, the agencies involved must collaborate to deliver results more efficiently and effectively. For the purpose of this report, we define “collaboration” as a joint effort by two or more agencies that is intended to produce a greater public benefit than when the agencies act alone. Our previous work indicated that federal agencies can efficiently and effectively collaborate when they, among other things, (1) identify a common goal, (2) establish joint strategies to achieve that goal, (3) agree on their roles and responsibilities, (4) identify ways to maximize and leverage their resources, and (5) establish procedures and policies for working together systematically across agency lines.¹ When agencies do not collaborate efficiently and effectively, their individual efforts are carried out in an uncoordinated way, thereby limiting the overall effectiveness and efficiency of federal expenditures. For example, in 2007, we added the federal oversight of food safety to our high-risk list because this fragmented system—in which 15 federal agencies collectively administer at least 30 laws related to food safety—has caused inconsistent oversight, ineffective coordination, and inefficient use of resources.²

In this context, you asked us to determine (1) the actions key federal agencies take to help detect and prevent seafood fraud and (2) the extent to which these key federal agencies collaborate with each other to help detect and prevent seafood fraud.

Our research identified CBP, NMFS, and FDA as the key agencies involved in detecting and preventing seafood fraud. To determine the actions these agencies have taken to detect and prevent seafood fraud, we reviewed data and documents from each agency on the amount and nature of seafood fraud that they have identified, actions they have taken to prevent seafood fraud, and actions they have taken against fraud perpetrators. At all three agencies, we reviewed program guidance, inspection operation manuals, and other documentation and interviewed knowledgeable

¹GAO, *Results Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005). The other three practices discussed in our report on effective collaboration are (1) develop mechanisms to monitor, evaluate, and report on results; (2) reinforce agency accountability for collaborative efforts through agency plans and reports; and (3) reinforce individual accountability for collaborative efforts through performance management systems.

²See our most recent series, GAO, *High-Risk Series: An Update*, [GAO-09-271](#) (Washington, D.C.: January 2009). Also see, GAO, *High-Risk Series: An Update*, [GAO-07-310](#) (Washington, D.C.: January 2007).

officials. We also obtained examples of seafood fraud criminal investigation cases and met with representatives from the major seafood industry trade associations. To determine the extent to which key federal agencies collaborate with each other to help detect and prevent seafood fraud, we reviewed existing federal interagency agreements and spoke with agency officials from CBP, NMFS, and FDA. (App. I provides additional information on our scope and methodology.)

We conducted this performance audit from January 2008 to February 2009, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Results in Brief

CBP and NMFS conduct several activities to help detect and prevent seafood fraud; however, FDA has taken few actions because it sees food safety as its top priority. These agency activities are described in the following text:

- CBP focuses on detecting schemes to avoid paying customs duties as seafood products enter the country, such as transshipment to avoid antidumping duties. CBP's import specialists review seafood import documentation on product type, value, and country of origin to ensure that importers have paid the appropriate duties. The agency also uses information provided by one of its National Targeting and Analysis Groups to help identify potentially fraudulent seafood shipments. This group analyzes data on foreign producers and importers that may be involved in transshipment schemes to avoid paying antidumping duties and works with port officials to examine these shipments as they arrive. For example, Chinese shrimp have been subject to an antidumping duty since 2005 because producers have set prices on the shrimp that were lower than the normal value. On the basis of this information and allegations from the domestic shrimp industry, a National Targeting and Analysis Group began to scrutinize imports of shrimp from Chinese producers and identified approximately \$6 million worth of Chinese shrimp that had been transshipped through Indonesia in 2005 to avoid antidumping duties.
- NMFS's seafood fraud detection activity consists of a voluntary, fee-for-service inspection program that supports the seafood industry in two ways. First, seafood retailers, such as supermarkets, may ask NMFS to

inspect the seafood products they purchase to ensure the products have not been misrepresented. In such cases, NMFS's inspectors verify a product's net weight and ensure the species is correctly identified. Second, seafood processors may ask NMFS, through its Quality Management Program, to inspect their seafood processing operations to not only ensure compliance with FDA's HACCP regulations but also to identify measures that can help prevent seafood fraud. Such measures may include requiring the processor to weigh all products and compare that information with the stated weight on the package before the product leaves the facility and periodically testing the scales. According to officials in NMFS's Seafood Inspection Program, NMFS inspects approximately one-third of the seafood consumed in the United States.

- FDA sees ensuring the safety of the nation's food supply as a top priority and, therefore, devotes minimal resources to detect and prevent seafood fraud. Nevertheless in the course of conducting its food safety activities, FDA has at times incidentally uncovered seafood fraud. More specifically, as part of its food safety activities to ensure that imports are not contaminated, among other things, FDA examines imported seafood products, which occasionally has resulted in its identifying seafood fraud. However, FDA's opportunities to identify fraud are limited because it examines only about 2 percent of imported seafood. FDA is also limited in its ability to detect seafood fraud because its primary oversight program for seafood processors—HACCP—does not require them to identify and mitigate economic fraud risks that can occur during processing. However, seafood oversight programs operated by NMFS and the Canadian government include such requirements. An FDA seafood fraud-related activity is the maintenance of a publicly available list of scientific and market names of seafood—the Seafood List—that is intended to help the seafood industry comply with FDA's regulations on product mislabeling. However, FDA did not fully update the publicly available list it created in 1993 until January 2009, and does not provide stakeholders with an opportunity to comment on proposed changes before they are finalized. In addition, FDA provides guidance to seafood processors to help ensure that their seafood products are safe. However, this guidance does not reflect the seafood labeling requirements in the Food Allergen Labeling and Consumer Protection Act of 2004, which requires that the species of fish or shellfish be included on product labels to notify consumers who may be allergic to a particular species of fish. According to a senior FDA official, the act's labeling requirements also could help detect and prevent species substitution, since processors would need to verify the species of fish or shellfish to ensure accurate labeling. Because the seafood HACCP regulations do not address economic fraud risks; the Seafood List, until very recently, had not been kept up to date; and FDA's guidance does not

reflect the allergen labeling requirements, the seafood industry may be less vigilant in ensuring their seafood products are correctly labeled and the public may more often encounter seafood products that are not what they are advertised to be. Consequently, we are recommending that FDA improve its ability to detect and prevent seafood fraud by (1) proposing amendments to its HACCP regulations to include measures to identify and mitigate economic fraud risks; (2) providing the opportunity for stakeholder comments prior to formalizing any changes to the Seafood List and routinely updating the public list; and (3) updating its guidance to reflect the seafood labeling requirements of the Food Allergen Labeling and Consumer Protection Act of 2004.

The federal agencies that share responsibility for detecting and preventing seafood fraud—CBP, NMFS, and FDA—do not efficiently and effectively collaborate with each other, which can diminish the efficiency and effectiveness of their efforts. Specifically, these agencies have not worked together to identify a common goal related to seafood fraud, established joint strategies to achieve such a goal, or agreed on their roles and responsibilities. Moreover, they have not identified ways to maximize and leverage their resources or established processes and policies for working together systematically across agency lines. As a result, these agencies are not sharing important information that could be helpful in detecting and preventing seafood fraud. For example, when FDA reviews the labels of imported products to identify potentially fraudulent labeling, it does not systematically share the results of these reviews with CBP. If CBP had access to the results of the labeling reviews, it could compare this information with the labels on products entering the country and better determine whether a product was mislabeled to avoid a customs duty or other import restrictions. In addition, these agencies have not leveraged their resources to address seafood fraud efficiently and effectively. For example, NMFS's voluntary fee-for-service inspection program and FDA's health and safety inspections are similar. However, an FDA official said that the agency is not sure whether it can rely on NMFS inspections, in part due to concerns about potential conflicts of interest, because NMFS is paid by industry to conduct its inspections. FDA raised this same concern to us in 2004 but added that it already had agreements with NMFS to deal with seafood safety and inspections, and that it would look at other ways to better leverage NMFS resources. Nonetheless, FDA does not currently try to determine whether NMFS has already inspected a seafood facility when it is deciding which facilities to inspect. Consequently, some facilities may be "over-inspected," while others are not inspected frequently enough. For example, in fiscal year 2007, FDA inspected 104 seafood facilities that were also inspected by NMFS; while FDA had not

inspected 1,464 other facilities since before fiscal year 2003. In addition, CBP, NMFS, and FDA each has its own laboratory capability for, among other things, determining the species of seafood samples they receive. The agencies also use different testing methodologies and standards for species identification and do not acknowledge each other's laboratory results, nor do they generally share the species standards they have developed. As a result, resources are not used efficiently or effectively. We are recommending that CBP, NMFS, and FDA collaborate to (1) develop goals, strategies, and mechanisms to efficiently and effectively share information and resources related to seafood fraud detection and prevention across agency boundaries and (2) create a federal agencywide library of seafood species standards. In commenting on a draft of this report, the Department of Commerce, representing NOAA; the Department of Health and Human Services, representing FDA; and the Department of Homeland Security, representing CBP, generally agreed with our recommendations. Appendixes II, III, and IV contain reprints of the departments' letters, respectively.

Background

Seafood fraud can include a variety of illegal activities done for economic gain and can occur at any point in the seafood supply chain. The domestic seafood supply chain begins with the harvester—that is, the people who catch or farm the seafood. From there, seafood products are shipped to processors, which then produce fresh, frozen, breaded, or cooked seafood. Processors or distributors then sell the seafood to supermarkets or restaurants. The process is similar for foreign seafood products, with one exception: these products enter the country through an importer and then move on to a distributor. According to the National Oceanic and Atmospheric Administration (NOAA), in fiscal year 2007, over 80 percent of the seafood consumed in this country was imported, and shrimp was the most widely consumed seafood. Seafood imports into the United States most frequently come from Canada, China, and Thailand, according to the U.S. Department of Agriculture's (USDA) Foreign Agriculture Service.

Federal investigations have identified incidents of seafood fraud. For example, the Department of Homeland Security's Immigration and

Customs Enforcement (ICE)³ and NOAA's Office for Law Enforcement investigation that began in 2004 identified seafood fraud that involved smuggling and distributing mislabeled catfish into the United States from Vietnam. According to the indictment, an individual and his companies in Florida aided by exporters in Vietnam imported thousands of pounds of catfish into the United States labeled as grouper to avoid paying antidumping duties that the Department of Commerce had imposed on Vietnamese catfish. The defendant pled guilty and was sentenced to 51 months in prison. The judge also ordered the companies to forfeit property and pay over \$1 million in restitution.

Seafood fraud can include a variety of illegal activities undertaken for economic gain. Such fraud typically involves mislabeling the seafood product and can include the following actions:

- *Transshipment to avoid duties:* Foreign producers may ship seafood products on route to the United States through a third country to avoid import duties by labeling the product's country of origin as the third country and also to avoid regulatory controls such as FDA import alerts.⁴
- *Over-treating:* Processors may, for example, over-bread prepared seafood products, use water-retaining chemicals, or over-glaze with an ice covering to artificially increase the weight of seafood products without indicating the true net weight of the seafood on the label.
- *Species substitution:* Participants in the seafood supply chain may label a species of seafood as another species. Typically, a lower-market-value species is labeled as a higher-market-value species to realize a larger profit. This results in consumers paying too much for the product.
- *Short-weighting:* Participants in the seafood supply chain may label packages of seafood as containing more than they actually contain.

³ICE is the largest investigative branch of the Department of Homeland Security. According to ICE, the agency assigns special agents to, among other things, investigate manufacturers and importers allegedly involved in the duty evasion schemes and uses agents stationed in foreign countries to conduct investigations.

⁴Import alerts are designed to ensure that products from processors covered by the alert are detained and refused entry into the United States until the importer can prove that the imported product is safe and complies with all applicable regulations, generally by providing FDA with the results of third-party laboratory analysis of the product.

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- *Other mislabeling and misrepresenting:* Participants in the seafood supply chain may provide various types of incorrect information about the seafood product or can commingle two or more different products having different values but sell the entire lot at the value of the highest priced product.

Seafood fraud is an inherently deceptive activity and poses challenges for federal agencies to detect and prevent it while still maintaining the flow of legitimate seafood goods into and within the United States. Some fraudulent activity can even occur openly. For example, seafood companies receive public, written solicitations to purchase fraudulent seafood products. One type of solicitation offers to sell packages of fish fillets that are purposely mislabeled as another fish type to avoid antidumping duties and also capitalize on the higher market value of the falsely labeled fish type. These fish fillets are sold at a discount to the initial buyer, but then can be fraudulently resold for a higher price. Another type of solicitation offers to sell short-weight packages of seafood at a discount that the buyer could then fraudulently resell at the full price on the basis of the labeled package weight.

Federal, state, and local agencies play a role in detecting and preventing seafood fraud throughout the supply chain. In general, federal agencies inspect seafood processors, distributors, and importers and imported seafood products. States also inspect seafood processors either through contracts with FDA or under their own authority. States and local governments inspect and regulate retail establishments such as restaurants and supermarkets.

CBP's trade-related responsibilities include assessing the final customs duties, including antidumping duties, due on imports and collecting those duties. All goods imported into the United States are subject to a rate of duty, which may be free for certain products. The U.S. government has established a duty rate according to the product classification code—for example, fish sticks and other fillets that are breaded or coated with batter have a specific classification code and duty rate.⁵ Antidumping and countervailing duties may also be required on imported products. The U.S. government may impose antidumping duties on products exported to the United States at unfairly low prices (i.e., dumping) and countervailing

⁵Generally, the Congress establishes normal customs duties and authorizes the executive branch to impose special customs duties, such as antidumping and countervailing duties.

duties on products exported to the United States that were subsidized by foreign governments. The Department of Commerce sets these duty rates for specific products, countries or manufacturers, or any combination of these factors.

NMFS provides voluntary fee-for-service inspection services through its Seafood Inspection Program on request to the seafood industry, primarily under the authority of the Federal Agricultural Marketing Act of 1946. NMFS provides its services to domestic and foreign seafood firms to help them ensure compliance with all applicable federal food regulations, including FDA's seafood HACCP regulations. NMFS's services include inspections of a firm's processes and products to identify food safety and economic fraud risks as well as laboratory analyses.

Along with its responsibility for ensuring the safety of other food products under the Federal Food, Drug, and Cosmetic Act, FDA has the primary responsibility for ensuring that the nation's seafood is safe, wholesome, and properly labeled.⁶ To carry out these responsibilities, FDA has created oversight programs designed to, among other things, examine and sample imported seafood products, inspect domestic and foreign seafood processors and importers, and assist state and local governments in their efforts to regulate retail establishments such as restaurants and supermarkets. Under the HACCP regulations, seafood processors are required to prepare and maintain a plan identifying critical points in the processing where contamination is reasonably likely to occur and implement control techniques to prevent or mitigate the contamination. FDA then inspects U.S. importers and domestic and foreign seafood processors to ensure their compliance with these HACCP regulations. When FDA first proposed the seafood HACCP regulations in 1994, the agency recommended that HACCP plans include controls for nonsafety hazards such as economic adulteration. Specifically, FDA recommended that the seafood industry adopt preventive processing measures to help ensure that, among other things, seafood was correctly identified and its weight properly recorded. Furthermore, FDA also proposed guidelines on how a seafood processor could use a HACCP-based approach to ensure that fish and fishery products were in compliance with the economic

⁶The 2008 Farm Bill made catfish subject to mandatory inspection by USDA. The new law requires that USDA continuously inspect domestic catfish, and that imported catfish meet equivalent standards before being imported into the United States. The Secretary of Agriculture in consultation with the Commissioner of the Food and Drug Administration has until the end of 2009 to issue regulations to implement the new law.

adulteration and misbranding provisions of the Federal Food, Drug, and Cosmetic Act. However, in finalizing its HACCP regulations, FDA eliminated these economic fraud controls. In discussing its reasoning for eliminating the economic fraud controls in the *Federal Register*, FDA stated that the seafood HACCP system would need to mature before the agency could determine whether it should address matters other than food safety hazards, such as economic fraud.

The seafood industry also plays a role in detecting and preventing seafood fraud. Seafood industry associations represent various aspects of the industry throughout the supply chain, from harvesters to retailers. They include product-specific associations, such as the Southern Shrimp Alliance in southern states or the Maine Lobster Promotion Council, or business-specific associations, such as the National Restaurant Association. These industry associations work to protect the brand name and quality of their respective products or businesses; monitor issues and legislation that may impact the industry, including fraud and other illegal activities; and work with government agencies and other organizations to promote the health and viability of their industry. Some of these associations have also provided federal agencies with information on potential seafood fraud, such as transshipping schemes to avoid antidumping duties and advertisements for short-weighted seafood products. In addition, the National Fisheries Institute (NFI) also created the Better Seafood Bureau to help its members combat such seafood fraud problems as transshipping to avoid antidumping duties, species substitution, and short-weighting.⁷ According to NFI, the goal of the Better Seafood Bureau is to promote economic integrity in the seafood industry and assure customers of the quality of the institute's members' products. NFI requires a hand-signed contract from each member's Chief Executive Officer that he or she will comply with all U.S. laws and regulations, and has created an accountability system that requires members who break the contract to pay for a third-party audit of its processes.⁸ The Southeastern

⁷NFI is a seafood industry advocacy organization. According to NFI, its mission is to educate the American public about seafood safety, sustainability, and nutrition. NFI's nearly 400 members range from the owners of small, family-owned fishing vessels to large, nationally traded corporations and include representatives of business, education, and government.

⁸The third-party audit of the member's processes is the normal practice NFI uses to hold its member accountable, but it reserves the right to dismiss the member from the Better Seafood Bureau without a third-party inspection or to take a different action, depending upon the type of violation.

Fisheries Association also developed the Seafood Product Quality Code in 1984 to educate any interested harvesters, processors, distributors, wholesalers, retailers, and consumers on standards and measures to promote product quality and build confidence in the seafood industry.

Federal agencies face challenges in achieving their missions, especially if they have limited resources and some elements of their missions are shared with other agencies. Effective collaboration is often key to overcoming these challenges, and our previous work has identified practices that can help enhance and sustain collaboration.⁹ First, collaboration requires agency staff, working across agency lines, to define and articulate the common federal outcome or goal they are trying to achieve. Second, once a common goal is established, agencies need to develop joint strategies. Such strategies help align the partner agencies' individual activities and resources to contribute to accomplishing the common goal. Third, the agencies should work together to agree on their roles and responsibilities. By agreeing on their roles and responsibilities, agencies can clarify who will do what, organize their joint and individual efforts, and determine who will lead the collaborative effort. Fourth, because each agency may contribute different activities and levels of resources toward achieving the common goal, by assessing their relative strengths and weaknesses, collaborating agencies can identify opportunities to leverage each other's resources. This may lead to additional benefits that would not have been available if they were working separately. Fifth, to ensure consistent implementation of their activities and a sustained collaborative effort to achieve the common goal, the agencies should develop compatible policies and procedures for all of the agencies to follow. (App. I includes a list of the three other collaboration practices we previously identified but did not address in this report.)

⁹[GAO-06-15](#).

CBP and NMFS Take a Variety of Actions to Detect and Prevent Seafood Fraud, While FDA Takes Few Actions Related to Seafood Fraud

CBP focuses on detecting schemes to avoid paying customs duties by reviewing import information; targeting and, along with ICE, investigating potential seafood fraud perpetrators; and taking enforcement actions, if warranted. NMFS offers a voluntary, fee-for-service seafood inspection program that can detect seafood fraud, such as short-weighting, and may also help prevent seafood fraud by identifying economic fraud risks during processing. However, NMFS inspects approximately one-third of the seafood consumed in the United States. FDA directs its field staff to minimize work on economic fraud issues because it considers food safety a higher priority than economic fraud. Nonetheless, FDA's health and safety actions, such as examinations of seafood imports, sometimes uncover seafood fraud incidentally. FDA's primary regulatory program for domestic seafood processors—HACCP—does not address the economic fraud risks also associated with processing. In addition, while FDA maintains a list of scientific and market names of seafood that is intended to help the seafood industry comply with FDA's regulations on product mislabeling, until January 2009, FDA had not fully updated the publicly available list it created in 1993, despite having made numerous changes since then. Finally, the guidance FDA provides to seafood processors to help ensure that their seafood products are safe does not reflect the seafood labeling requirements in the Food Allergen Labeling and Consumer Protection Act of 2004, which could incidentally help detect and prevent species substitution, since processors would need to verify the species of fish or shellfish to ensure accurate labeling.

CBP Takes a Variety of Actions to Detect Schemes to Falsify Import Information and Thereby Avoid Paying Import Duties

For imported seafood to enter U.S. commerce, the importer must file for entry with CBP and submit electronic or paper entry documents to CBP. The entry documents include basic information about the imported product, such as its type, quantity, and value. As the first step, port officials select some of these entry documents to review to determine whether to allow the imported product, including seafood, to enter U.S. commerce.¹⁰ However, due to the large number of goods imported into the United States, port officials can only examine a fraction of incoming shipments. For example, from fiscal years 2004 to 2008, CBP officials examined between approximately 1.0 to 2.4 percent of all seafood imports. Importers must file additional documents (known as "entry summary" documents) and pay the appropriate duties, taxes, and fees on imported

¹⁰All imported goods are reviewed for national security purposes in a screening process that occurs prior to the importer filing for entry of the imported goods.

merchandise for consumption, including seafood products, within 10 days after CBP releases them from its custody. CBP's import specialists and other port officials select some entry summary documents to review to ensure accurate duty collection, which includes some seafood. For example, Chinese shrimp and crawfish and Vietnamese frozen fish fillets are subject to antidumping duties. On the basis of these reviews, CBP officials select importers for further review whose documentation indicates that they may be trying to avoid paying the appropriate duties.

In addition, CBP operates a national statistical sampling program, known as the Compliance Measurement Program, which randomly selects shipments of imports by commodity for review or examination to determine the degree to which they comply with customs trade laws and regulations, among other things. The Compliance Measurement Program was designed to identify trade problems or patterns of deception for specific commodities so that CBP officials can then focus their efforts against these illegal or fraudulent activities. Port officials only review a limited number of seafood entries under the program. For example, in fiscal year 2007, import specialists from all ports in the United States examined 766 seafood product entries out of 390,799 such entries and found a high compliance rate, 97.3 percent, for the applicable trade revenue laws. Although the Compliance Measurement Program could uncover seafood fraud or duty evasion, CBP officials noted that in-depth investigative work may be needed to uncover schemes to willfully defraud the U.S. government, which is beyond the scope of the examinations conducted under the program.

Another step CBP takes to detect and prevent seafood fraud is to target shipments that CBP officials suspect are part of a scheme to evade customs duties. CBP has five National Targeting and Analysis Groups (NTAG) that develop criteria to target potentially fraudulent imports. One of these NTAGs develops criteria to target potentially fraudulent shipments of seafood and reviews leads from other CBP officials and external organizations, such as trade associations, on transshipping schemes to avoid paying antidumping and countervailing duties. This NTAG researches and monitors trade trends to identify changes or patterns in trade that may signal potential fraudulent activity. For example, as part of their 2005 inquiry into an allegation of illegal transshipment of Chinese shrimp through Indonesia, the NTAG staff reviewed information on the shippers of Indonesian shrimp before and after the antidumping duty order for Chinese shrimp was put in place. They found a sharp decrease in shrimp imports from China after the antidumping duty order was issued in early 2005 and a concurrent increase

in shrimp imports from Indonesia, among other countries. The NTAG staff enlisted the support of ICE to investigate Indonesian shrimp exporters who they suspected were illegally transshipping Chinese shrimp. They found that some Indonesian firms were importing Chinese shrimp and then shipping them to the United States labeled as Indonesian shrimp. CBP found that, in 2005, approximately \$6 million worth of Chinese shrimp had been illegally transshipped through Indonesia to avoid antidumping duties.

While the illegal transshipment of Chinese shrimp continued through a different transshipping point, this time it also had a health- and food-safety-related effect. In June 2007, FDA announced a countrywide import alert on five Chinese-farmed seafood products, including shrimp. This import alert required that all Chinese shrimp be detained and refused entry, unless the importer could prove the absence of unapproved drugs in the shrimp. On the basis of industry information and CBP and ICE investigations, CBP determined that Chinese shrimp was being transshipped to the United States through Malaysia. Due to this illegal transshipment, importers of Chinese shrimp were able to circumvent not only the 2005 antidumping duty but also FDA's recent import alert. In September 2007, CBP tested shipments of suspected Chinese shrimp illegally transshipped through Malaysia for the presence of unapproved drugs and found some contaminated shrimp. On the basis of CBP's information, in March 2008, FDA issued a new import alert requiring importers of shrimp from one Malaysian manufacturer to prove the absence of unapproved drugs prior to entering future shipments of shrimp into U.S. commerce.

In 2007, the NTAG that works on seafood fraud issues also helped identify another scheme importers were using in their attempt to evade antidumping duties on Chinese shrimp. Under this scheme, importers provided CBP with fraudulent information on the product type to evade antidumping duties. A precursor to breaded shrimp called "dusted shrimp" was exempted by the Department of Commerce from the antidumping duty order on imported Chinese shrimp.¹¹ On the basis of allegations from the U.S. shrimp industry, CBP initiated an intensive examination and

¹¹The Department of Commerce's definition of true, dusted shrimp is that having a coating of rice or wheat flour constituting between 4 and 10 percent of the product's total weight after being dusted, but prior to the shrimp being frozen. In conjunction with subject matter experts, CBP developed a set of characteristics that a product is required to meet to be considered true, dusted shrimp.

sampling operation to determine whether importers were bringing in shipments of falsely declared dusted shrimp to avoid the antidumping duties on Chinese shrimp. Over the course of a 90-day period, CBP found that of the 81 alleged dusted shrimp entries examined and sampled, approximately 64 percent of the shipments did not meet the criteria to qualify as dusted shrimp. The potential loss of trade revenue from these fraudulent dusted shrimp shipments was approximately \$5 million. Extrapolating back to when the antidumping duty order first became effective in 2005, CBP concluded that the importers caught importing these fraudulent dusted shrimp imported approximately \$117 million worth of potentially fraudulent dusted shrimp with a possible loss of trade revenue from the uncollected antidumping duties of \$132 million.

CBP's Office of Regulatory Audit provides additional support with suspected transshipping incidents to determine whether importers are participating in schemes to evade duties. CBP audits importers to ensure that they have reported and paid all trade revenue, such as antidumping duties, as required under trade laws and agreements. They perform two types of audits—a quick-response audit, which focuses on a specific issue, and a focused assessment audit, which evaluates all of a company's CBP activities and controls. The quick-response audits are focused on detecting fraudulent practices, such as unlawful transshipment of seafood to evade antidumping duties. For example, a quick-response audit concluded in 2007 found that an importer did not pay approximately \$2.2 million in antidumping duties on imported Chinese shrimp that was transshipped through Indonesia. The focused assessment audits are comprehensive audits where the auditors review and test the company's management oversight processes or "internal controls" to identify areas of uncollected trade revenue, such as unpaid antidumping duties. The focused assessment audits have included seafood importers, but they have only uncovered one violation since 2005 that was related to seafood fraud.

Finally, in the event CBP identifies violations of laws, it can assess penalties against an importer. The maximum penalty amount that CBP can assess varies, depending upon whether the perpetrator's actions were fraudulent, negligent, or grossly negligent. Penalties can range from two to four times the loss of lawful duties, taxes, and fees to the U.S. government or the domestic value of the merchandise. In addition, CBP may cooperate with other agencies to pursue criminal charges against perpetrators of seafood fraud. For example, in July 2003, CBP cooperated with ICE to investigate a case where, according to ICE officials, one exporter and several importers conspired to evade antidumping duties in excess of \$3 million on freshwater crawfish. According to these officials, the

coconspirators were indicted for smuggling and conspiracy in November 2003, and one defendant was convicted of conspiracy in 2004.

NMFS's Voluntary, Fee-for-Service Seafood Inspection Program Helps Industry Detect and Prevent Seafood Fraud

NMFS offers two types of services to help industry address seafood fraud. NMFS provides these voluntary, fee-for-service inspection services through its Seafood Inspection Program. This program currently serves approximately 375 domestic seafood firms and 63 foreign seafood firms, and, according to senior officials in NMFS's Seafood Inspection Program, NMFS inspects approximately one-third of the seafood consumed in the United States. First, NMFS inspects shipments (known as "lots") of seafood products purchased by its clients that include retailers such as supermarkets. During lot inspections, inspectors take a random, representative sample from the seafood lot and may perform several tests on this sample, including weighing it to ensure that the actual weight matches the labeled package weight. NMFS inspectors have identified instances of seafood fraud, especially short-weighting, in seafood products processed domestically and in foreign facilities. NMFS also may be able to uncover species substitution during a lot inspection in two ways: (1) according to senior officials in NMFS's Seafood Inspection Program, NMFS inspectors are trained to visually differentiate between different types and species of fish and (2) inspectors can use the capabilities of NOAA's National Seafood Inspection Laboratory to test for and identify the species of seafood. However, NMFS does not maintain a comprehensive list of all lot inspections conducted and, thus, does not have the ability to determine the frequency with which it uncovers fraudulent seafood products.

Second, NMFS also offers a Quality Management Program that can help seafood processors decrease the potential for fraudulent seafood by applying HACCP principles to both food safety and economic fraud risks. In 2007, NMFS inspected 202 domestic seafood companies under its Quality Management Program. As part of this program, NMFS inspects seafood processors to ensure their compliance with FDA's seafood HACCP regulations that require processors to identify potential food safety hazards during processing and establish controls to mitigate them. NMFS also goes a step further and requires that seafood processors that choose to participate in the Quality Management Program (1) create a "Defect Action Plan," which identifies potential economic fraud risks during the processing of seafood, such as short-weighting, and (2) develop measures to mitigate those fraud risks. For example, the plan could require that samples of the finished seafood product be removed from the processing line every hour and the weight checked to ensure that the

actual weight and the weight as stated on the package are the same. If any short-weights were identified, then all products since the last check would be weighed again, and the content amounts would be corrected. Also, the scales used in the processing phase would be checked and recalibrated, if necessary. In addition, processors can inspect seafood products upon receipt and compare the processors' species identification with the species listed on the invoices. Through these measures, processors can provide some assurance against short-weighting and species substitution.

FDA Considers Economic Issues a Low Priority Compared with Health and Safety Issues, but It Has Incidentally Identified Instances of Seafood Fraud

FDA is responsible for ensuring that foods are safe, wholesome, sanitary, and properly labeled. To that end, FDA is authorized to issue regulations to enforce the Federal Food, Drug, and Cosmetic Act. The act prohibits the misbranding or adulteration of food products, which would include seafood products that have been mislabeled, substituted, or over-glazed. FDA considers detecting violations like these a low priority and devotes minimal resources to such work, according to published program guidance and senior FDA officials. For example, FDA's program guidance to its field staff on imported and domestic seafood products states that no resources have been allocated for seafood fraud-related work, and that resource expenditures in this area should be kept to a minimum. According to FDA senior officials, the agency does not have the staff or resources to address economic fraud in addition to their food safety responsibilities, which they believe are a top priority and more important.

Nevertheless, in the course of their work examining the safety of seafood imports, FDA inspectors may uncover seafood fraud. FDA inspectors review import entry information, such as the type of seafood being imported and the importer's history of violations, if any; physically examine the imported goods; and collect samples for laboratory analysis to identify those that are potentially in violation of U.S. food regulations and laws. FDA may refuse to allow an imported seafood product to enter U.S. commerce if it appears to be adulterated or misbranded or for other violations of regulations and laws that FDA administers. However, from fiscal years 2003 to 2008, only 1 percent of the refusals of imported seafood products were related to seafood fraud.

FDA also maintains an "import alert" list to detain entries of imported foods that appear to have significant recurring violations. FDA currently has three import alerts related to seafood fraud. One import alert lists 10 foreign firms that were found to have declared an assortment of seafood products under the name of a fictitious, incorrect, or substituted species. The other two import alerts provide information to FDA's field staff about

the potential mislabeling of two specific types of fish—catfish and red snapper. The import alerts inform field office staff of the species of fish that can legally be labeled as catfish or red snapper and guidance on how to handle incoming shipments that may not be accurately labeled. However, FDA officials only physically examine a small percentage of imported seafood—about 2 percent of all seafood entries from fiscal years 2003 to 2008. Of the 2 percent of imported seafood examined by FDA officials, approximately 0.05 percent of these examinations were related to seafood fraud.

FDA's primary oversight program for domestic seafood firms is the HACCP program, but the focus of this program is health and safety not economic fraud. FDA's seafood HACCP regulations require seafood processors to identify and establish controls to mitigate potential food safety hazards. FDA inspects domestic firms involved in the production, storage, and distribution of fish and fishery products to ensure that their HACCP plans are properly designed and implemented. However, FDA inspectors spend very little time looking for seafood fraud. For example, the percentage of domestic seafood firm inspections where investigators conducted seafood fraud work was approximately 0.5 percent from fiscal years 2003 to 2008. FDA also inspects some importers and foreign processors for HACCP compliance because, as the agency noted in publishing its final HACCP regulations, the importer and foreign processor share responsibility in complying with importing regulations. Importers are required either to (1) obtain seafood products from a country that has an active memorandum of understanding or similar agreement with FDA that documents the equivalency or compliance of the foreign inspection system with the U.S. system or (2) implement written verification procedures to show that the foreign processor has complied with the HACCP regulations. Furthermore, FDA inspects foreign fish and fishery processors that export seafood to the United States, but this number of inspections is very limited. For example, in fiscal year 2007, FDA inspected only 61 of 14,569 registered foreign seafood firms.

In its 1994 seafood HACCP proposed rule, FDA recommended that seafood firms use HACCP-like measures to control for economic fraud because, as FDA stated, seafood fraud could also impact food safety. In the proposed rule, FDA stated that the “. . . misidentification of species may also have adverse public health consequences.”¹² The connection

¹²Proposal to Establish Procedures for the Safe Processing and Importing of Fish and Fishery Products, 59 Fed. Reg. 4142 (Jan. 28, 1994).

between economic fraud and food safety can be seen in an incident in 2007 where two individuals became ill after eating puffer fish. According to FDA, the puffer fish was imported into the country mislabeled as monkfish. Unlike monkfish, puffer fish contains a potentially deadly toxin called *tetrodotoxin*. CBP and ICE's shrimp transshipping investigation also highlights the connection between economic fraud and food safety. CBP and ICE's investigation found that foreign manufacturers and importers were not only attempting to circumvent antidumping duties by sending Chinese shrimp to the United States through Malaysia, but these companies were also evading an FDA import alert aimed at stopping adulterated Chinese shrimp from entering the United States. Incidents like these and others have led FDA officials, including a senior official in FDA's Office of Food Safety, to reconsider the agency's limited level of effort regarding economic fraud because they now believe that, if left unregulated, over time, seafood fraud may create food safety problems. Specifically, that same official said that it may be time for FDA to reconsider incorporating nonfood safety hazards, such as economic fraud, in the seafood HACCP regulations. According to senior FDA officials, the agency can still take actions, such as reviewing labels and issuing import alerts to prevent seafood fraud. However, these officials acknowledged that requiring measures in HACCP to address seafood fraud would build prevention into the processing of seafood. In addition, NMFS officials that administer the agency's Quality Management Program believe that amending FDA's HACCP regulations to include measures to address economic fraud risks would require minimal resources for the seafood industry and FDA to implement. Moreover, according to officials in the Canadian Food Inspection Agency, Canada has a program similar to NMFS's program that requires seafood processors to identify and mitigate both food safety hazards and economic fraud risks. However, because FDA inspectors primarily inspect for compliance with HACCP regulations, until the agency amends the HACCP regulations to include measures to identify and mitigate economic fraud risks, its inspectors will continue to spend limited time ensuring against mislabeled products, and seafood processors may be less attentive to protecting against fraud.

Another opportunity for FDA officials to detect seafood fraud is during their review of food labels. According to officials in FDA's Division of Import Operations and Policy, food label reviews sometimes occur during HACCP inspections of domestic seafood processors and examinations of imported seafood products. According to FDA guidance, investigators are to review labels on at least three food products when conducting a domestic or foreign firm inspection. The review entails ensuring that the label complies with all relevant food label laws and FDA regulations. For

example, the Federal Food, Drug, and Cosmetic Act, as amended, prohibits the “misbranding” of food, which includes, among other things, labeling that is false or misleading. In addition, food labels must generally include an ingredients list that identifies the product’s ingredients by their common or usual names in order of predominance by weight. Food labels must also accurately state the contents in terms of weight, measure, or numerical count of the product. However, our September 2008 report found that FDA does not have reliable data on the number of labels reviewed, nor does it track the complete and timely correction of the violations it identifies during the reviews.¹³ As a result, FDA cannot provide reliable information on the number of label reviews that identified seafood fraud, nor on any corrections of the seafood fraud violations it identified.

FDA may also detect seafood fraud through complaints from industry associations. For example, on several occasions during 2008, NFI provided FDA with copies of public, written solicitations from foreign and domestic companies offering to sell packages of seafood packed to 80 or 90 percent of the labeled package weight for a discount. These short-weighted products could then potentially be fraudulently sold in U.S. commerce for the full price on the basis of the labeled package weight. According to an FDA Consumer Safety Officer, FDA wanted NFI to provide additional information on these companies, such as their locations, because some of these companies were not in FDA’s inventory of seafood processors or importers, and FDA could not identify them with certainty. However, we found that some of the companies were listed in FDA’s inventory because FDA had previously inspected them. According to a senior FDA official, FDA is still working with NFI on this matter; however, as of December 2008, the agency had taken no action against any of the companies that sent solicitations.

In addition, FDA may detect seafood fraud from consumers and others who contact FDA field staff, by telephone, to complain about issues such as suspected short-weighted seafood products or species substitution. For example, in one case, a consumer complained to FDA about frozen shrimp mislabeled as a product of Mexico when a second label underneath the first indicated that it was a product of Thailand. Typically, the FDA District

¹³GAO, *Food Labeling: FDA Needs to Better Leverage Resources, Improve Oversight, and Effectively Use Available Data to Help Consumers Select Healthy Foods*, [GAO-08-597](#) (Washington, D.C.: Sept. 9, 2008).

Consumer Complaint Coordinator would field the telephone call, collect information from the consumer, such as the description of the product and the problem with the product, and would attempt to determine the responsible seafood firm. The Complaint Coordinator or other FDA field staff would evaluate the complaint and determine whether immediate action is required or whether the information would be used for surveillance in the next inspection of the seafood firm. However, our 2008 food labeling report found that FDA program managers could not use FDA's data system that captures consumer complaints to track their timely and appropriate resolution because these data were not entered into the system in a manner that would facilitate analysis. Specifically, standard terminology was not used and information on complaint resolutions was captured in different data fields.¹⁴ We found similar issues regarding the follow-up of consumers' complaints of seafood fraud. We reviewed FDA summary data for 105 consumer complaints related to such things as misbranded, mislabeled, and short-weighted seafood products from fiscal years 2004 through 2007. We judgmentally selected and reviewed FDA's internal documents for 5 of 105 consumer complaints and found that for all 5 of the complaints, FDA indicated that it would follow up on the complaints during the next inspection of the firm that had produced the seafood product in question. However, we found no information in FDA's inspection reports to indicate that FDA had followed up on three complaints. There was no inspection report available for the fourth complaint, and for the fifth complaint, there was a report for an inspection that was conducted a few days prior to the filing of the complaint.

There are several actions that FDA can take if seafood fraud is discovered during an inspection of a seafood firm. FDA may issue a warning letter—which is a notice that enforcement actions may be forthcoming if corrections are not made—to firms for serious violations of regulatory significance. For less serious violations, FDA may send an untitled letter, which is an informal communication that corrective actions are needed. However, FDA issued no warning letters or untitled letters regarding seafood fraud from fiscal years 2005 through 2008. Additionally, FDA may initiate enforcement actions against seafood firms, such as seizing and removing seafood from the marketplace; obtaining an injunction to stop a company from engaging in behavior that violates certain prohibitions of the Federal Food, Drug, and Cosmetic Act and regulations; or barring seafood firms from importing goods into the United States. FDA, however,

¹⁴[GAO-08-597](#).

has not taken any of these actions for seafood fraud violations since 2000, according to a senior FDA official. However, FDA's Office of Criminal Investigations has investigated allegations of seafood fraud and provided information to the Department of Justice for legal action against the perpetrators.

FDA helps the seafood industry avoid species substitution by maintaining on its agency Web site a publicly available "Seafood List," which is a compilation that includes the scientific and market names for imported and domestic seafood. The Seafood List is intended to promote uniformity in the use of FDA-acceptable market names by the seafood industry and to provide consistent advice on these names. For example, "catfish" can only be used as a market name for fish that belong to the family *Ictaluridae*, even though there are other species of fish whose vernacular name may include the word catfish. However, before January 2009, the public version of the Seafood List had not been kept up to date. According to an FDA official responsible for the Seafood List, even though over 400 changes have been made to FDA's internal version of the list since 1993, only about 22 changes had been made to the public version of the list as of the end of 2008. However, in January 2009, FDA made the revised and fully updated list available to the public on its Web site.

Other countries, such as Canada and Australia, maintain a similar type of Seafood List. However, their policies and procedures for maintaining these lists differ from those of FDA. For example, Canada publishes on the Internet guidelines and criteria that it uses to assign a new name for a species of seafood. In addition, the Canadian government will not allow a new name for a fish if it is similar or resembles the name of a fish with a higher market value. Also, changes made to Canada's seafood list are disseminated to an e-mail distribution list that interested parties can join. In contrast, until January 2009, FDA did not provide information to the public on the guidelines or criteria that it used to determine acceptable market names for seafood. In addition, stakeholders do not have the opportunity to comment on proposed changes to the Seafood List, unless the change was required by law or regulation. In contrast, Australia allows for a 3-month public consultation period prior to finalizing the change. A senior FDA official told us that stakeholders can write to FDA at any time with comments about the Seafood List, but that there is no formal comment period before changes are made to the list because it is considered guidance, not an agency regulation.

A recent example of a change to the Seafood List illustrates some of these issues. In April 2005, FDA allowed a restaurant to advertise langostino—

with the common names “squat lobster” and “Colorado langostino”—as “langostino lobster.” However, as of December 2008, the publicly available Seafood List had not been updated to reflect this change. According to the list on December 10, 2008, the market name for langostino is “langostino,” and the common names are “squat lobster” or “Colorado langostino.” Furthermore, according to officials from the Maine Lobster Promotion Council, the council wrote to FDA to protest this change to the naming of langostinos because it allows a lower-market-value seafood, langostinos, to take advantage of the higher market value and reputation of the American lobster name.¹⁵ According to officials from the Maine Lobster Promotion Council, FDA did not respond to its inquiries regarding the reasons for the name change for langostinos. An FDA official responsible for the Seafood List told us that FDA responded to the council by e-mail in August 2008 stating that, “we have not objected to use of the term langostino lobster for various species of squat lobsters.”

According to a senior FDA official, seafood labeling requirements from the Food Allergen Labeling and Consumer Protection Act of 2004 may help prevent species substitution, but FDA has not updated its guidance to the seafood industry to fully reflect the act’s labeling requirements. The act requires the product label to contain the name of a food source from which a major food allergen is derived, and, when the major food allergen is fish or Crustacean shellfish, the specific species of fish or shellfish must be listed to notify consumers with food allergies of a particular type of fish species. According to the same FDA official, the act’s labeling requirement may help detect and prevent species substitution, since processors would need to verify the type of fish or shellfish they are processing to ensure accurate labeling. However, these seafood labeling requirements are not reflected in FDA’s guidance to the seafood industry on the development of their HACCP plans to prevent and control the health and food safety hazards associated with seafood—the *Fish and Fisheries Products Hazards and Controls Guidance*.¹⁶ According to a senior FDA official, seafood processors should be aware of the act’s requirements, and FDA can still enforce those requirements, even if they are not reflected in the

¹⁵The Maine Lobster Promotion Council, established by Maine in 1991, markets and promotes the sale of Maine lobster in local, regional, national, and world markets year-round. The council comprises harvesters, dealers, and public members from each of Maine’s three regions.

¹⁶U.S. Food and Drug Administration, Center for Food Safety and Applied Nutrition, *Fish and Fisheries Products Hazards and Controls Guidance: Third Edition* (June 2001). See the following Web address: <http://www.cfsan.fda.gov/~comm/haccp4.html>.

ATTACHMENT 5



OLAF press releases

OLAF /07/01
Brussels, 30 January 2007

[Senior Management](#)

OLAF STUBS OUT ILLEGAL TRADE IN CIGARETTE LIGHTERS

A scheme of illegal trade in cigarette lighters from Asia, with a financial impact for the European Community budget of at least 20 Million Euros in evaded duties, has been detected by the European Anti-Fraud Office (OLAF) in co-operation with its partners in the EC Member States. OLAF and the national authorities are currently investigating several cases of illegal imports of non-refillable lighters of Chinese origin, falsely declared as originating in Indonesia or Malaysia. The joint investigations have revealed that Malaysia alone was used for transshipments of more than 300 million lighters from China during the past four years. If these cases had not been detected the cost to the Community budget, which will now be recovered from the importers, would have been borne by the Community taxpayers.

The total consumption of non-refillable lighters in the EU is estimated at 1 billion per year, at consumer prices ranging from 50 cents upwards. Imports of non-refillable lighters from China to the EU are liable to an Anti-Dumping Duty of 6.5 cents per lighter. Investigating cases of evasion of Anti-Dumping Duties is part OLAF's task in the fight against fraud affecting the EU budget and in protecting the Community taxpayer.

OLAF, together with its national partner services in the Member States, has detected several cases where Indonesia or Malaysia was fraudulently declared as the country of origin of the imported lighters. The investigation of these cases will lead to the recovery of duties and the potential criminal investigation by the national authorities of offenders in the Member States concerned, namely the UK, Czech Republic, Lithuania, Italy, Spain and Germany. In the framework of its investigations, OLAF has also worked closely with the industry producing lighters in the EC.

Malaysia case

The investigation of the imports of lighters falsely declared as of Malaysian origin has been the most spectacular so far: The joint verification conducted by OLAF in Malaysia, together with the customs authorities of Germany, UK, Italy and the Czech Republic and with the support of the competent national Malaysian authorities, revealed that in



Franz-Hermann Brüner has been the Director General of OLAF since 1st March 2000.

[Useful external contacts](#)



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the past four years more than 300 million flint-operated lighters from China have passed through Malaysia. They were solely transhipped in order to disguise the true Chinese origin of the goods.

It has been established that the Malaysian company which claimed to have produced the lighters merely provided cover for the transhipped goods. Hundreds of container loads of Chinese lighters were switched in the commercial free-zones in Port Klang, Penang and Johor Bahru. By providing false information to the local authorities the parties involved succeeded in obtaining certificates of Malaysian origin in order to bypass the anti-dumping measures.

For this case alone OLAF and its partners investigated more than 300 containers which had been transhipped in this way. One container carries around one million lighters resulting in a revenue loss of 65,000 Euros per container

Indonesia case

There was a further joint verification mission conducted in Indonesia in late November 2006 with the full support and cooperation of the Indonesian national authorities into the alleged production there of flint-operated lighters exported to the European Community. On that occasion it had been jointly established by both parties that more than 100 consignments under investigation did not originate in Indonesia. Further investigations into the true origin of the goods are foreseen for the near future. All the containers of Chinese lighters had been routed via Hong Kong and were switched in Singapore, which is frequently used by fraudulent operators as a hub for this kind of activity.

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[Home page](#)

ATTACHMENT 6

[The Star Online](#) > Business

Monday March 15, 2010

China shipping fasteners to Europe via M'sia to avoid duty

By DAVID TAN

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GEORGE TOWN: Domestic mild-steel (or carbon-steel) fastener manufacturers are facing intense competition in Europe from China-made mild-steel fasteners shipped via Malaysia to avoid an anti-dumping duty imposed by the European Union (EU).

China-made fasteners have been slapped with an anti-dumping duty rate of an average 87.3% imposed by the EU since February 2009.

Chin Well Holdings Bhd senior manager Richard Yeap Soon Thong told StarBiz that since then, the selling price of Chin Well's mild-steel fasteners in Europe had to be lowered by at least 20% to compete against China-made fasteners.

"This eats into our profit margin. Otherwise, we could have marked up our pricing by 20% to 30% per tonne. The competition from Chinese fasteners has pressured Chin Well to lower its selling price of fasteners per tonne to RM4,000 and RM5,000," he said.



Richard Yeap Soon Thong

Some local and foreign manufacturing companies are providing re-packing services for China-made fasteners and shipping them out with their generalised system of preferences (GSP) and made-in-Malaysia certificate of origin documents which enable them to enter Europe with respective duties of 1.2% and 3.7%.

"The profit to be obtained from such re-packing and shipping services is high, about 7% of the invoice for each shipment of container, which is about US\$20,000 or about RM80,000.

"In the country presently, there are only six major steel fastener producers, of which four specialises in manufacturing mild-steel fasteners, producing collectively 4,000 tonnes to 5,000 tonnes of fasteners monthly.

"Since China was hit by the anti-dumping duty from EU, Malaysia's monthly export of fasteners to the EU has increased substantially by about four to five times.

"This is the feedback we got from our distributors and wholesalers in Europe," Yeap said.

In 2009 Malaysia exported 99,000 tonnes of all types of fasteners, comprising screws, bolts, nuts, coach screws, screw hooks, rivets, and cotter-pins, compared to 55,000 tonnes in 2008, according to data obtained from the Ministry of International Trade and Industry (Miti).

"We have informed and updated Miti on the matter, lest Malaysia is also slapped with anti-dumping duty from the EU. The Miti office from Penang has recently informed us that they are working with the EU Anti-Fraud Office (OLAF), the port authorities, and the customs to check the abuse," he added.

ED Fastening Sdn Bhd managing director T.W. Teh said as a result of of the situation, the company had suffered a sizable loss of market share in Europe.

"Our revenue for 2009, due to price competition and loss of market share in Europe, has dropped to about RM5mil, otherwise the it could easily be 50% more," he said, adding that Europe generated about 35% of the company's revenue.

The European Anti-Fraud Office (OLAF) customs unit head, David Murphy, said in an on-line news report on Feb 9 that millions of euros worth of China-made goods were being fraudulently passed off as Malaysian-made by using the Port Klang Free Zone trans-shipment hub, where imported Chinese goods were transferred to another container and re-exported using the invoice of a Malaysian company.

“Some firms also use false documents to obtain certificate of origin, which declares that the goods are of Malaysian origin. OLAF is working closely with Miti to tackle the problem that also exists at other major trans-shipment hubs such as the Jebel Ali free zone in Dubai and Singapore,” Murphy said.

He added that the real risk to Malaysia was that commercial action might be taken by the EU against Malaysian companies, thereby affecting legitimate manufacturers.

When contacted, Miti, in a statement, said the ministry was scrutinising the applications for the export of fasteners to the EU.

“All exporters were required to provide additional documentation including letter of indemnity from the exporter for non involvement in transshipment or import-export activity using GSP form A in the Free Trade and Industrial Zone.

“The ministry also carried out on-site verification visits to the fasteners’ manufacturers premises to verify their capability and capacity of producing fasteners for export market.

“We are also work closely with other Malaysian authorities such as customs, port authorities, and free zone authorities to ensure there is no transshipment of fasteners from China,” it said.

The Miti statement also noted that “in a statement dated Feb 9, OLAF said it was highly satisfied with the cooperation from Miti and other government authorities relating to the evasion of anti-dumping duties.”

Malaysian Iron and Steel Industry Federation (Misif) president, Chow Chong Long, acknowledges the occurrence of such transshipment cases due to the liberalisation of trade.

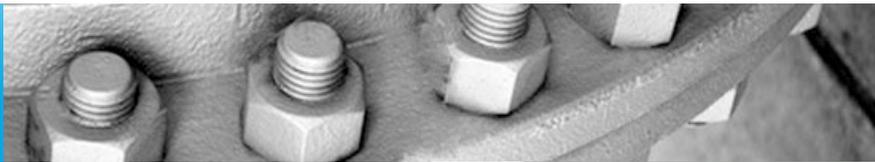
“We have tried in the past to obtain the monthly figures of steel products coming in and going out of the country from the Department of Statistics Malaysia. The figures would help us detect whether there is excess of steel products being brought in and leaving the country given our present capacity and allow us to follow up with the Government to take timely and appropriate action.

Chow added that “the Government should look into ways on how it can get Misif access quickly the latest data on the export and import of steel products into Malaysia.”

“The problem is that the Department of Statistics Malaysia is always three months late with its data,” he said.

The Federation of Malaysian Manufacturers’ northern region chairman, Datuk O.K. Lee, said Malaysian manufacturers should tap into their capabilities to produce high-value added products to compete against China-made goods and not resort to providing such re-packing and transshipment services that could undermine the country’s image.

ATTACHMENT 7

[FASTENER + FIXING NEWS](#)[< BACK](#)

Malaysia takes action on circumvention

Thursday, 3 June 2010

Malaysian authorities are reported to have visited 14 companies identified by EU investigatory body OLAF as potentially being involved in circumvention of the carbon steel fastener anti-dumping regulation.

Most of the companies are understood to be Chinese subsidiaries set up since the imposition of EU anti-dumping measures on fasteners from the People's Republic of China. Sources in Malaysia report that several companies, where investigators found no or limited evidence of manufacturing capability, will no longer be able to obtain export approval and may face closure.

Global Fasteners has confirmed it was one of the companies inspected. It says that, while the authorities are not issuing a formal 'clean bill of health' to any factory, it is confident it will continue to be able to obtain certification of origin and export its products to the EU. One UK importer is known to have obtained a Customs 'Binding Origin Information' in relation to imports from Global Fasteners.

The Malaysian investigations follow reports in February in which the European Anti-Fraud Office (OLAF) customs unit head, David Murphy, expressed concerns relating to transshipment of Chinese goods in the Port Klang Free Zone and re-export using Malaysian company invoices. At the time Murphy was quoted as saying that some firms also used false documents to obtain certificate of origin, adding that OLAF was working closely with the Malaysian Ministry of International Trade and Industry (Miti). Murphy also made it clear that there was a real risk Malaysia could be subject to commercial action by the EU unless the problem was resolved. Miti has been emphatic that OLAF was "highly satisfied" with co-operation it has provided.

Nevertheless alarm bells have been ringing in the Malaysian fastener industry. Richard Yeap Soon Thong, a senior representative of Chin Well Holdings Bhd, has been expressing concerns to local media over the extent of circumvention that could be occurring in Malaysia and its immediate and potential impact on genuine fastener manufacturers in the country. According to Malaysian official data the country exported 99,000 tonnes of fasteners during 2009. Compared with 55,000 tonnes in 2008 that represents an 80% increase during a year in which most fastener exporting nations saw a huge fall in volumes.

There can be little doubt that Miti will share the outcome of its investigations of the 14 companies with OLAF and that the latter will be able to use the information alongside EU customs records to identify recipients of shipments from companies, which the Malaysian investigation demonstrates do not have genuine manufacturing capability.

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