



## DEPARTMENT OF COMMERCE

### International Trade Administration

[A-570-943, C-570-944]

### **Oil Country Tubular Goods from the People's Republic of China: Preliminary Affirmative Determination of Circumvention of the Antidumping Duty and Countervailing Duty Orders**

**AGENCY:** Enforcement and Compliance, International Trade Administration, Department of Commerce.

**SUMMARY:** The U.S. Department of Commerce (Commerce) preliminarily determines that imports of seamless oil country tubular goods (OCTG), completed in Thailand using steel billets produced in the People's Republic of China (China), are circumventing the antidumping duty (AD) and countervailing duty (CVD) orders on OCTG from China. Interested parties are invited to comment on this preliminary determination.

**DATES:** Applicable [INSERT DATE OF PUBLICATION IN THE *FEDERAL REGISTER*].

**FOR FURTHER INFORMATION CONTACT:** Walter Schaub, Office of Policy, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue, NW, Washington, DC 20230; telephone: (202) 482-0907.

### **SUPPLEMENTARY INFORMATION:**

#### Background

On May 21, 2010 and January 20, 2010, Commerce published in the *Federal Register* the AD and CVD orders on OCTG from China, respectively.<sup>1</sup> On December 18, 2024, Commerce initiated a country-wide circumvention inquiry pursuant to section 781(b) of the Tariff Act of

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<sup>1</sup> See *Certain Oil Country Tubular Goods from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order*, 75 FR 28551 (May 21, 2010); see also *Certain Oil Country Tubular Goods from the People's Republic of China: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order*, 75 FR 3203 (January 20, 2010) (collectively, *Orders* or *China Orders*).

1930, as amended (the Act), to determine whether imports of seamless OCTG completed in Thailand using steel billets manufactured in China are circumventing the *Orders* and, accordingly, should be covered by the scope of the *Orders*.<sup>2</sup> On February 27, 2025, Commerce selected, in alphabetical order, Boly Pipe Co., Ltd. (Boly Pipe), Nanobest Limited (Nanobest), and Petroleum Equipment (Thailand) Co., Ltd. (PET) as the mandatory respondents in this circumvention inquiry.<sup>3</sup>

On April 23, 2025, Commerce extended the time limit for issuing the preliminary determination in this circumvention inquiry from May 19 to August 15, 2025.<sup>4</sup> For a complete description of the events that followed the initiation of this circumvention inquiry, *see* the Preliminary Decision Memorandum.<sup>5</sup>

#### Scope of the *Orders*

The products covered by the *Orders* include hollow steel products of circular cross-section, including oil well casing and tubing, of iron (other than cast iron) or steel (both carbon and alloy), whether seamless or welded, regardless of end finish (*e.g.*, whether or not plain end, threaded, or threaded and coupled) whether or not conforming to API or non-API specifications, whether finished (including limited service OCTG products) or unfinished (including green tubes and limited service OCTG products), whether or not thread protectors are attached. For a full description of the scope of the *Orders*, *see* the Preliminary Decision Memorandum.<sup>6</sup>

#### Merchandise Subject to the Circumvention Inquiry

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<sup>2</sup> *See Oil Country Tubular Goods from the People's Republic of China: Initiation of Circumvention Inquiry on the Antidumping and Countervailing Duty Orders*, 89 FR 102864 (December 18, 2024) (*Initiation Notice*), and accompanying Initiation Checklist, "Oil Country Tubular Goods (OCTG) from the People's Republic of China," dated December 12, 2024 (Initiation Checklist).

<sup>3</sup> *See* Memorandum, "Respondent Selection," dated February 27, 2025.

<sup>4</sup> *See* Memorandum, "Extension of Deadline for the Preliminary Determination in the Circumvention Inquiry Pertaining to Thailand," dated April 23, 2025.

<sup>5</sup> *See* Memorandum, "Antidumping and Countervailing Duty Orders on Oil Country Tubular Goods from the People's Republic of China: Preliminary Decision Memorandum for the Circumvention Inquiry Covering Exports from Thailand," dated concurrently with, and hereby adopted by, this notice (Preliminary Decision Memorandum).

<sup>6</sup> *Id.* at 3.

This circumvention inquiry covers seamless OCTG completed in Thailand using Chinese-origin steel billets and subsequently exported from Thailand to the United States (inquiry merchandise).

### Methodology

Commerce is conducting this circumvention inquiry in accordance with section 781(b) of the Act and 19 CFR 351.226. For a complete description of the methodology underlying the preliminary determination, *see* the Preliminary Decision Memorandum. A list of topics discussed in the Preliminary Decision Memorandum is included as Appendix I to this notice. The Preliminary Decision Memorandum is a public document and is on file electronically via Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS). ACCESS is available to registered users at <https://access.trade.gov>. In addition, a complete version of the Preliminary Decision Memorandum can be accessed directly at <https://access.trade.gov/public/FRNoticesListLayout.aspx>.

### Preliminary Circumvention Determination

As detailed in the Preliminary Decision Memorandum, Commerce preliminarily determines that seamless OCTG completed in Thailand using Chinese-origin steel billets and subsequently exported from Thailand to the United States is circumventing the *Orders* on a country-wide basis. As a result, in accordance with section 781(b) of the Act, we preliminarily determine that this merchandise should be included within the scope of the *Orders*. *See* the "Suspension of Liquidation and Cash Deposit Requirements" section below for details regarding suspension of liquidation and cash deposit requirements. *See* the "Certifications" and "Certification Requirements" sections below for details regarding the use of certifications.

### Suspension of Liquidation and Cash Deposit Requirements

Based on the preliminary affirmative country-wide determination of circumvention with respect to Thailand, in accordance with 19 CFR 351.225(l)(2), Commerce will direct U.S. Customs and Border Protection (CBP) to suspend liquidation and to require a cash deposit of

estimated duties on unliquidated entries of inquiry merchandise that were entered, or withdrawn from warehouse, for consumption, on or after December 18, 2024, the date of publication of the initiation of this circumvention inquiry in the *Federal Register*.

Seamless OCTG completed in Thailand from steel billets that are not of Chinese origin is not subject to this inquiry. Therefore, cash deposits are not required for such merchandise under the *China Orders*. However, Commerce preliminarily finds that seamless OCTG completed in Thailand using China-origin steel billets is circumventing the AD and CVD orders on OCTG from China. Imports of seamless OCTG completed in Thailand are subject to certification requirements, and cash deposits may be required.

Entries for which the importer and exporter have met the certification and documentation requirements described below and in Appendix II to this notice will not be subject to suspension of liquidation or the cash deposit requirements.

In accordance with 19 CFR 351.228(b), where the certification and documentation requirements are not met for an entry, Commerce intends to instruct CBP to suspend the entry and collect cash deposits at the rates applicable to the AD and CVD orders on OCTG from China, and may instruct CBP to assess antidumping or countervailing duties at the applicable rate. For companies with their own company-specific rate under the *China Orders*, the cash deposit rate will be the company-specific rate. Otherwise, Commerce will instruct CBP to require AD cash deposits equal to the China-wide rate of 99.14 percent and CVD cash deposits equal to the all-others rate of 13.41 percent.

Commerce established the following third-country case number in the Automated Commercial Environment (ACE) for entries of seamless OCTG completed in Thailand using China-origin steel billets: A-549-991 and C-549-992.

These suspension of liquidation requirements will remain in effect until further notice.

## Certifications

To administer the preliminary affirmative country-wide determination of circumvention for Thailand, Commerce established importer and exporter certifications, which allow companies to certify that specific entries of seamless OCTG from Thailand are not subject to suspension of liquidation or the collection of cash deposits pursuant to this preliminary affirmative country-wide determination of circumvention because the merchandise is not made with Chinese-origin steel billets or is made with an input other than steel billets (*see* Appendix II to this notice).

Importers and exporters that claim that the entry of seamless OCTG is not subject to suspension of liquidation or the collection of cash deposits because the merchandise is not made with Chinese-origin steel billets or is made with an input other than steel billets must complete the applicable certification and meet the certification and documentation requirements described below, as well as the requirements identified in the applicable certification.

## Certification Requirements

Importers are required to complete and maintain the applicable importer certification, and maintain a copy of the applicable exporter certification, and retain all supporting documentation for both certifications. With the exception of the entries described below, the importer certification must be completed, signed, and dated by the time the entry summary is filed for the relevant entry.

The importer, or the importer's agent, must submit the importer's certification, the exporter's certification, the steel mill certificate for the seamless OCTG, and the steel mill certificate for the steel input used to produce the seamless OCTG (*e.g.*, steel billet), to CBP at the time of entry by uploading these documents into the document imaging system (DIS) in ACE. The steel mill certificates must identify the country of melt and pour. Where the importer uses a broker to facilitate the entry process, the importer should obtain the entry summary number from the broker. Agents of the importer, such as brokers, however, are not permitted to certify on behalf of the importer. Consistent with CBP's procedures, importers shall identify certified

entries by using importers' additional declaration (record 54) AD/CVD Certification Designation (type code 06) when filing an entry summary.<sup>7</sup>

Exporters are required to complete and maintain the applicable exporter certification and provide the importer with a copy of that certification and all supporting documentation (*e.g.*, invoice, purchase order, production records, mill certificates, *etc.*). With the exception of the entries described below, the exporter certification must be completed, signed, and dated by the time of shipment of the relevant entries. The exporter certification should be completed by the party selling the seamless OCTG that was manufactured in Thailand and exported to the United States.

Additionally, the claims made in the certifications and any supporting documentation are subject to verification by Commerce or CBP. Importers and exporters are required to maintain the certifications and supporting documentation until the later of: (1) the date that is five years after the latest entry date of the entries covered by the certification; or (2) the date that is three years after the conclusion of any litigation in United States courts regarding such entries.

For all seamless OCTG from Thailand that was entered, or withdrawn from warehouse, for consumption during the period December 18, 2024 (the date of initiation of this circumvention inquiry), through September 3, 2025, where the entry has not been liquidated (and entries for which liquidation has not become final), the importer and exporter certifications should be completed and signed as soon as practicable, but not later than October 3, 2025. The importer/exporter certifications, the steel mill certificate for the seamless OCTG, and the steel mill certificate for the steel input used to produce the seamless OCTG (*e.g.*, steel billet) should be uploaded to the DIS in ACE as soon as practicable, but not later than October 3, 2025. For such entries, importers, and exporters each have the option to complete a blanket certification covering multiple entries, individual certifications for each entry, or a combination thereof. The

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<sup>7</sup> See Cargo System Messaging Service #59384253, dated February 12, 2024; *see also Announcing an Importer's Additional Declaration in the Automated Commercial Environment Specific to Antidumping/Countervailing Duty Certifications*, 89 FR 7372 (February 2, 2024).

exporter must provide the importer with a copy of the exporter certification no later than October 3, 2025.

For unliquidated entries (and entries for which liquidation has not become final) of seamless OCTG that were declared as non-AD or non-CVD type entries (*e.g.*, type 01) and entered, or withdrawn from warehouse, for consumption in the United States during the period December 18, 2024 (the date of initiation of these circumvention inquiries) through September 3, 2025, for which none of the above certifications may be made, importers must file a Post Summary Correction with CBP, in accordance with CBP's regulations, regarding conversion of such entries from non-AD/CVD type entries to AD/CVD type entries (*e.g.*, from type 01 to type 03). Importers must report those AD/CVD type entries using the third country case numbers identified in the "Suspension of Liquidation and Cash Deposit Requirements" section, above. The importer must pay cash deposits on those entries consistent with the regulations governing post summary corrections that require payment of additional duties.

Interested parties may comment on these certification requirements, and on the certification language contained in Appendix II to this notice in their case briefs.

#### Public Comment

Pursuant to 19 CFR 351.226(f)(4), case briefs or other written comments should be submitted to the Assistant Secretary for Enforcement and Compliance no later than fourteen days after the date of the publication of this notice.<sup>8</sup> Rebuttal briefs, limited to issues raised in case briefs, may be submitted no later than seven days after the deadline for case briefs.<sup>9</sup> Parties who submit case or rebuttal briefs in this proceeding are encouraged to submit with each argument: (1) a statement of the issue; (2) a brief summary of the argument; and (3) a table of authorities.<sup>10</sup>

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<sup>8</sup> See 19 CFR 351.309(f)(4).

<sup>9</sup> See 19 CFR 351.309(d); see also *Administrative Protective Order, Service, and Other Procedures in Antidumping and Countervailing Duty Proceedings*, 88 FR 67069, 67077 (September 29, 2023) (*APO and Service Final Rule*).

<sup>10</sup> See 19 CFR 351.309(c)(2)(d)(2).

As provided under 19 CFR 351.309(c)(2) and (d)(2), in prior proceedings we have encouraged interested parties to provide a public executive summary of their brief that should be limited to five pages total, including footnotes. In this proceeding, we instead request that interested parties provide at the beginning of their briefs a public, executive summary for each issue raised in their briefs.<sup>11</sup> Further, we request that interested parties limit their executive summary of each issue to no more than 450 words, not including citations. We intend to use the executive summaries as the basis of the comment summaries included in the issues and decision memorandum that will accompany the final determination in this proceeding. We request that interested parties include footnotes for relevant citations in the executive summary of each issue. Note that Commerce has amended certain of its requirements pertaining to the service of documents in 19 CFR 351.303(f).<sup>12</sup>

Pursuant to 19 CFR 351.310(c), interested parties who wish to request a hearing must submit a written request to the Assistant Secretary for Enforcement and Compliance, U.S. Department of Commerce, within 30 days after the date of publication of this notice in the *Federal Register*, filed electronically via ACCESS. Hearing requests should contain: (1) the party's name, address, and telephone number; (2) the number of participants and whether any participant is a foreign national; and (3) a list of the issues to be discussed. Issues raised in the hearing will be limited to issues raised in the respective comments.<sup>13</sup> If a request for a hearing is made, Commerce intends to hold the hearing at a date and time to be determined and will notify the parties through ACCESS.<sup>14</sup> Parties should confirm the date, time, and location of the hearing two days before the scheduled date.

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<sup>11</sup> We use the term “issue” here to describe an argument that Commerce would normally address in a comment of the Issues and Decision Memorandum.

<sup>12</sup> See *APO and Service Final Rule*.

<sup>13</sup> See 19 CFR 351.310.

<sup>14</sup> See 19 CFR 351.310(d).

All submissions, including affirmative and rebuttal comments, as well as hearing requests, should be filed using ACCESS. An electronically-filed document must be received successfully in its entirety by ACCESS by 5:00 p.m. Eastern Time on the established deadline.

U.S. International Trade Commission (ITC) Notification

Consistent with section 781(e) of the Act, Commerce will notify the ITC of this preliminary determination to include the merchandise subject to this circumvention inquiry within the *Orders*. Pursuant to section 781(e) of the Act, the ITC may request consultations concerning Commerce's proposed inclusion of the inquiry merchandise. If, after consultations, the ITC believes that a significant injury issue is presented by the proposed inclusion, it will have 60 days from the date of notification by Commerce to provide written advice.

Notification to Interested Parties

This determination is issued and published in accordance with section 781(b) of the Act and 19 CFR 351.226(g)(1).

Dated: August 14, 2025.

**Abdelali Elouaradia,**  
*Deputy Assistant Secretary  
for Enforcement and Compliance.*

## Appendix I

### List of Topics Discussed in the Preliminary Decision Memorandum

- I. Summary
- II. Background
- III. Scope of the *Orders*
- IV. Merchandise Subject to the Circumvention Inquiry
- V. Period of Circumvention Inquiry
- VI. Surrogate Country and Methodology for Valuing Factors of Production from Non-Market Economy Sources and Processing in China
- VII. Statutory and Regulatory Framework for a Circumvention Inquiry
- VIII. Analysis of Statutory Criteria for the Circumvention Inquiry
- IX. Other Statutory Criteria
- X. Summary of Analysis
- XI. Verification
- XII. Certification Process and Country-Wide Affirmative Determination of Circumvention
- XIII.** Recommendation

## Appendix II

### IMPORTER CERTIFICATION

I hereby certify that:

- A. My name is {IMPORTING COMPANY OFFICIAL'S NAME} and I am an official of {IMPORTING COMPANY}, located at {ADDRESS OF IMPORTING COMPANY};
- B. I have direct personal knowledge of the facts regarding the importation into the Customs territory of the United States of seamless oil country tubular goods (OCTG) produced in Thailand that entered under entry summary number(s), identified below, and are covered by this certification. "Direct personal knowledge" refers to facts the certifying party is expected to have in its own records. For example, the importer should have direct personal knowledge of the importation of seamless OCTG, including the exporter's and/or foreign seller's identity and location;
- C. If the importer is acting on behalf of the first U.S. customer, include the following sentence as paragraph C of this certification:

The seamless OCTG covered by this certification was imported by {IMPORTING COMPANY} on behalf of {U.S. CUSTOMER}, located at {ADDRESS OF U.S. CUSTOMER};

If the importer is not acting on behalf of the first U.S. customer, include the following sentence as paragraph C of this certification:

{NAME OF IMPORTING COMPANY} is not acting on behalf of the first U.S. customer.

- D. The seamless OCTG covered by this certification was shipped to {NAME OF PARTY IN THE UNITED STATES TO WHOM THE MERCHANDISE WAS FIRST SHIPPED}, located at {U.S. ADDRESS TO WHICH MERCHANDISE WAS SHIPPED}.
- E. I have personal knowledge of the facts regarding the production of the imported products covered by this certification. "Personal knowledge" includes facts obtained from another party, (e.g., correspondence received by the importer (or exporter) from the producer regarding the source of steel (steel billets) or other inputs used to produce the imported seamless OCTG);
- F. This certification applies to the following entries (repeat this block as many times as necessary):

Entry Summary #:

Entry Summary Line Item #:

Foreign Seller:

Foreign Seller's Address:

Foreign Seller's Invoice #:

Foreign Seller's Invoice Line Item #:

Seamless OCTG Producer:

Seamless OCTG Producer's Address:

Name of Producer of steel input (e.g., billets):

Address of Producer of steel input (e.g., billets):

Country of Origin of steel input (e.g., billets):

- G. The seamless OCTG covered by this certification is not produced using steel billets produced in China;
- H. I understand that {IMPORTING COMPANY} is required to maintain a copy of this certification and sufficient documentation supporting this certification (*i.e.*, documents maintained in the normal course of business, or documents obtained by the certifying party, for example, certificates of origin, product data sheets, mill test reports, productions records, invoices, *etc.*) until the later of: (1) the date that is five years after the date of the latest entry covered by the certification or; (2) the date that is three years after the conclusion of any litigation in the United States courts regarding such entries;
- I. I understand that {IMPORTING COMPANY} is required to maintain a copy of the exporter's certification (attesting to the production and exportation of the imported merchandise identified above), and any supporting documentation provided to the importer by the exporter, until the later of: (1) the date that is five years after the date of the latest entry covered by the certification; or (2) the date that is three years after the conclusion of any litigation in United States courts regarding such entries;
- J. I understand that {IMPORTING COMPANY} is required to submit a copy of the importer and exporter certifications, the steel mill certificate for the seamless OCTG, and the steel mill certificate for the steel input used to produce the seamless OCTG (*e.g.*, steel billet) at the time of entry summary by uploading these documents into the Document Imaging System in the Automated Commercial Environment, and to provide U.S. Customs and Border Protection (CBP) and/or the U.S. Department of Commerce (Commerce) with the importer certification, a copy of the exporter's certification, and any supporting documentation provided to the importer by the exporter, upon request of either agency. Consistent with CBP's procedures, importers shall identify certified entries by using importers' additional declaration (record 54) AD/CVD Certification Designation (type code 06) when filing entry summary.
- K. I understand that the claims made herein, and the substantiating documentation, are subject to verification by CBP and/or Commerce;
- L. I understand that entries of seamless OCTG from Thailand that are accompanied by deficient certifications may be subject to antidumping and/or countervailing duties.
- M. I understand that failure to maintain the required certification and supporting documentation, or failure to substantiate the claims made herein, or not allowing CBP and/or Commerce to verify the claims made herein, may result in a *de facto* determination that all entries to which this certification applies are within the scope of the antidumping duty (AD) and countervailing duty (CVD) orders on OCTG from China. I understand that such finding will result in:
- (i) suspension of liquidation of all unliquidated entries (and entries for which liquidation has not become final) for which these requirements were not met;
  - (ii) the importer being required to post the antidumping duty and countervailing duty cash deposits determined by Commerce; and
  - (iii) the importer no longer being allowed to participate in the certification process.
- N. I understand that agents of the importer, such as brokers, are not permitted to make this certification;

This certification was completed and signed on, or prior to, the date of the entry summary if the entry date is after September 3, 2025. If the entry date is on or before September 3, 2025,

this certification was completed, signed, and uploaded to CBP's ACE DIS by no later than October, 3, 2025.

- O. I am aware that U.S. law (including, but not limited to, 18 U.S.C. §1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. government.

Signature

{NAME OF COMPANY OFFICIAL}

{TITLE OF COMPANY OFFICIAL}

{DATE}

## EXPORTER CERTIFICATION

The party that made the sale to the United States should fill out the exporter certification.

I hereby certify that:

- A. My name is {COMPANY OFFICIAL'S NAME} and I am an official of {NAME OF FOREIGN COMPANY THAT MADE THE SALE TO THE UNITED STATES}; located at {ADDRESS OF FOREIGN COMPANY THAT MADE THE SALE TO THE UNITED STATES};
- B. I have direct personal knowledge of the facts regarding the production and exportation of the seamless oil country tubular goods (OCTG) and the steel input to the seamless OCTG for which sales are identified below. "Direct personal knowledge" refers to facts the certifying party is expected to have in its own records. For example, an exporter should have direct personal knowledge of the producer's identity and location;
- C. The seamless OCTG covered by this certification was shipped to {NAME OF PARTY IN THE UNITED STATES TO WHOM MERCHANDISE WAS FIRST SHIPPED}, located at {U.S. ADDRESS TO WHICH MERCHANDISE WAS SHIPPED};
- D. The seamless OCTG covered by this certification is not produced using steel billets produced in China;
- E. This certification applies to the following sales to {NAME OF U.S. CUSTOMER}, located at {ADDRESS OF U.S. CUSTOMER} (repeat this block as many times as necessary):

Foreign Seller's Invoice # to U.S. Customer:

Foreign Seller's Invoice to U.S. Customer Line item #:

Seamless OCTG Producer Name:

Seamless OCTG Producer's Address:

Producer's Invoice # to Foreign Seller: *(If the foreign seller and the producer are the same party, put NA here.)*

Name of Producer of steel input (e.g., billets):

Address of Producer of steel input (e.g., billets):

Country of Origin of steel input (e.g., billets):

- F. The seamless OCTG covered by this certification was shipped to {NAME OF U.S. PARTY TO WHOM MERCHANDISE WAS SHIPPED}, located at {U.S. ADDRESS TO WHICH MERCHANDISE WAS SHIPPED};
- G. I understand that {NAME OF FOREIGN COMPANY THAT MADE THE SALE TO THE UNITED STATES} is required to maintain a copy of this certification and sufficient documentation supporting this certification (*i.e.*, documents maintained in the normal course of business, or documents obtained by the certifying party, for example, product data sheets, mill test reports, productions records, invoices, *etc.*) until the later of: (1) the date that is five years after the latest date of the entries covered by the certification; or (2) the date that is three years after the conclusion of any litigation in the United States courts regarding such entries;
- H. I understand that {NAME OF FOREIGN COMPANY THAT MADE THE SALE TO THE UNITED STATES} is required to provide the U.S. importer with a copy of this certification, the steel mill certificate for the seamless OCTG, and the steel mill certificate for the steel input

used to produce the seamless OCTG (e.g., steel billet), and is required to provide U.S. Customs and Border Protection (CBP) and/or the U.S. Department of Commerce (Commerce) with this certification, and any supporting documents, upon request of either agency;

- I. I understand that the claims made herein, and the substantiating documentation, are subject to verification by CBP and/or Commerce;
- J. I understand that failure to maintain the required certification and supporting documentation, or failure to substantiate the claims made herein, or not allowing CBP and/or Commerce to verify the claims made herein, may result in a *de facto* determination that all sales to which this certification applies are within the scope of the antidumping duty and countervailing duty orders on OCTG from China. I understand that such a finding will result in:
  - (i) suspension of all unliquidated entries (and entries for which liquidation has not become final) for which these requirements were not met;
  - (ii) the importer being required to post the antidumping duty and countervailing duty cash deposits determined by Commerce; and
  - (iii) the seller/exporter no longer being allowed to participate in the certification process.
- K. I understand that agents of the seller/exporter, such as freight forwarding companies or brokers, are not permitted to make this certification.
- L. This certification was completed and signed, and a copy of the certification was provided to the importer, on, or prior to, the date of shipment if the shipment date is after September 3, 2025. If the shipment date is on or before September 3, 2025, this certification was completed and signed, and a copy of the certification was provided to the importer, by no later than October, 3, 2025; and
- M. I am aware that U.S. law (including, but not limited to, 18 U.S.C. §1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. government.

Signature

{NAME OF COMPANY OFFICIAL}

{TITLE OF COMPANY OFFICIAL}

{DATE}

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