

April 2, 2015

Mr. Michel Parent

Canadian International Trade Tribunal
15th Floor, 333 Laurier Avenue West
Ottawa, Ontario K1A 0G7
michel.parent@tribunal.gc.ca, citt-tcce@tribunal.gc.ca

Re: Public Interest Inquiry on Potential BC Exemption from Anti-Dumping Duties on Concrete Reinforcing Bar

Dear Mr. Parent,

We are providing this letter to indicate our support of a Public Interest Inquiry regarding the recent ruling of the Canadian International Trade Tribunal (CITT) that identifies concrete reinforcing bar imported from China, Korea, and Turkey under the *Special Import Measures Act* (SIMA).

The Canadian Home Builders' Association of BC represents more than 1,600 member companies in the residential construction industry in British Columbia through nine local affiliated home building associations located throughout the province. Our industry creates 134,500 jobs in new construction, renovation and related fields – making it one of the largest employers in the province. With 28,356 housing starts in British Columbia in 2014 and an increased forecast for 2015, new housing starts are a key driver of economic growth in our province.

Rebar is an important material component in residential construction as required by the *British Columbia Building Code*, and represents approximately 2-8% of construction input costs. Builders consulted estimate that the continued imposition of anti-dumping duties will result in a cost increase of approximately \$1,200 to \$2,000 per door on an average single-family residence, and \$3,600 to \$10,000 per door for higher-density housing built in concrete. This could mean an added cost totaling \$16 million or more per year for the former and \$136 million per year for the latter. These cumulative impacts mean that housing affordability will be affected, placing a further strain on British Columbians' ability to purchase homes. Builders and developers cannot simply pass on the added costs to the homebuyers.

A decision by CITT to impose ongoing anti-dumping duties on rebar will result in higher housing costs and ultimately diminished economic activity in British Columbia. In the absence of a steel producing industry in B.C., combined with the high costs of transporting rebar from Central Canada, the residential construction industry relies on supply primarily from the United States and overseas. Now is not the time to put homebuyers in the crosshairs of a dispute that does not apply to this market.

We commend the efforts of ICBA on this issue and request that British Columbia receive a regional exclusion from any penalty tariffs from the imposition of duties on imported rebar from Korea, China and Turkey under SIMA.

Thank you for your consideration.

Sincerely,



Neil Moody
Chief Executive Officer

c.c. Simon Howse, CHBA BC President
Ron Rapp, Chair CHBA BC Government Relations Committee
Dan Doyle, Chief of Staff to the Premier of British Columbia
Chris Gardner, Principal Secretary to the Premier of British Columbia