

Rebuttal Comments Of The Government Of British Columbia On The Draft Policy Bulletin Regarding The Conduct Of Changed Circumstance Reviews Of The Countervailing Duty Order On Softwood Lumber From Canada

Purpose of the Policy Bulletin, Paragraphs 1-4.

Comment:

These rebuttal comments are filed by the Government of British Columbia in response to comments filed with the Department on August 8, 2003, concerning the Department's Draft Policy Bulletin. As an initial matter, the Government of British Columbia agrees with the comments filed by the Government of Canada on August 8, 2003. The Government of British Columbia believes that the countervailing duties currently imposed on Canadian softwood lumber exports are inconsistent with both U.S. and international law. In addition, the Government of British Columbia agrees that Footnote 3 in the Draft Policy Bulletin is unnecessary and contrary to the stated intent of the Policy Bulletin.

The Government of British Columbia has reviewed the comments filed by the Coalition for Fair Lumber Imports, and believes that they do not warrant any change in the Policy Bulletin. The Coalition's comments go largely to how any changed circumstances review should be conducted rather than to the standards and language in the Draft Policy Bulletin itself. For this reason, we will not address in this submission the numerous inaccuracies and erroneous legal and economic analyses in the Coalition's August 8, 2003 submission. The Government of British Columbia will instead address those issues at the appropriate time in any changed circumstances review.