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The Committee on Pipe and Tube Imports (CPTI)
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Public Comments of the Committee on Pipe and Tube Imports (CPTI)
As to the Introduction of the
Markings Harmonization Act of 2002 (HR 4128)
107th Congress

Background

The Committee on Pipe and Tube Imports (CPTI) is a not for profit trade association comprised of U.S. carbon and stainless producers of pipe, tube and fittings products. Founded in 1984, the CPTI serves as the industry's voice in Washington, DC on matters related to trade issues which impact the industry.

The CPTI has strongly supported the U.S. unfair trade laws and has supported the efforts of the U.S. trade agencies, including the Department of Treasury and the U.S. Customs Service; the Office of the U.S. Trade Representative; the Department of Commerce and the U.S. International Trade Commission in the administration and enforcement of the trade laws.

Comments on the "Markings Harmonization Act of 2002"

These comments address the "Markings Harmonization Act of 2002" (H.R. 4128) which was introduced in April 2002 in the House and Senate and is currently pending in the respective Committees in Congress. The CPTI membership is aware of the importance of the existing markings rules and regulations as prescribed by the U.S. Customs Service. The industry has advocated "strict markings definitions" to ensure that the country of origin along with other entry information is obtained when pipe, tube and fittings products enter the U.S.

The provisions included in H.R. 4128 would change the existing markings law as it applies to these products. Specifically, as described in the bill, the ultimate purchaser of flanges or butt welding fittings would be allowed to perform minimal changes to an imported product which would result in the

purchaser being able to mark the product as their own instead of the product from the original country of origin. As detailed in the bill, many of these changes are minimal at least and would not otherwise represent a substantial transformation to the product under normal Customs application of the law. Thus, the end user of the product would not know the actual country of origin of the product and would instead be under the impression that the company selling the finished product had manufactured the fitting or flange, when most of the value, character, and origin of the fitting or flange came from a foreign country.

The CPTI believes that the provisions as outlined in H.R. 4128 weaken the existing marking and country of origin requirements in the law. Furthermore, this legislation deviates from the purpose of the labeling and markings rules which apply to this industry and prevents the end user or customer from knowing the true country of origin of the product. The CPTI opposes this legislation and would not support this bill to move forward in this session of Congress.

The Committee on Pipe and Tube Imports – Membership Roster - Effective - May 31, 2002

MEMBER COMPANIES

Allied Tube & Conduit

American Steel Pipe Division (American Cast Iron Pipe Co.)

Berg Steel Pipe

Bristol Metals

California Steel and Tube

Grant Prideco, Inc.

Hannibal Industries, Inc.

IPSCO Tubulars, Inc.

Leavitt Tube

Lone Star Steel Company

LTV Copperweld

Marcegaglia, USA, Inc.

Maruichi American Corporation

Maverick Tube Corporation

NS Group, Inc

North Star Steel

Northwest Pipe Company

OMSCO

Phoenix Tube

Premiere Pipe and Tube Group, Inc.

Searing Industries

Sharon Tube Company

Stupp Corporation

Tex-Tube Company

Valmont Industries

Vest, Inc.

Western Tube & Conduit

Wheatland Tube/John Maneely

ASSOCIATE MEMBER

Alloy Stainless Products Inc.

Anvil International

Capitol Manufacturing Co.

Chicago Roll Company

Ideal Forging Corp.

LaBarge Pipe and Steel

Maass Flange Corp.

WCI Steel

Wheeling Machine Products Inc.

Wheeling Pittsburgh Steel Corp.