



Safeguard Questionnaire (Importer)

Safeguard measures on certain steel products

Case: TF0006

| | |
|--------------------------------|--|
| Period of Investigation (POI): | 01 January 2013 – 31 December 2017 |
| Most Recent Period (MRP): | 01 January 2018 – 30 June 2020 |
| Deadline for response: | 28 November 2020 |
| Case team contact: | Imogen Yapp, Lead Investigator, TF0006@traderemedies.gov.uk |
| Completed on behalf of: | <i>Thyssenkrupp Materials (UK) Ltd</i> |

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

☐ Confidential

☒ Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** - a **Confidential** and a **Non-Confidential version**. Both copies should be returned to TRID using the trade remedies service (www.trade-remedies.service.gov.uk).



Table of Contents

| | |
|---|-----------|
| The scope of this review..... | 1 |
| Goods subject to review..... | 1 |
| Like goods..... | 2 |
| Directly competitive goods | 2 |
| Instructions..... | 4 |
| Introduction | 4 |
| Preparing confidential and non-confidential copies..... | 5 |
| Providing information from subsidiaries or associated parties | 5 |
| What happens next | 6 |
| Verifying the information you supply | 6 |
| How to complete this questionnaire..... | 7 |
| SECTION A: Company structure and operations | 8 |
| A1 Identity and contact details..... | 8 |
| A2 Company information | 8 |
| A3 Board members and principal shareholders..... | 10 |
| A4 Operational links with other companies or persons..... | 10 |
| A5 Accounting practices | 11 |
| SECTION B: About your goods..... | 14 |
| B1 Your company's products..... | 14 |
| B2 Understanding the UK market..... | 16 |
| SECTION C: Imports, purchases and stocks..... | 20 |
| C1 Imports and purchases..... | 20 |
| C2 Stocks and forward orders | 21 |
| SECTION D: Sales | 23 |
| D1 Sales and profitability | 23 |
| D2 Sales incorporating the goods subject to review | 23 |
| SECTION E: Company performance..... | 25 |
| E1 Employment | 25 |
| E2 Other factors | 25 |
| SECTION F: Causation of injury..... | 27 |
| F1 Other causation factors | 27 |
| SECTION G: Economic interest | 28 |



| | |
|--|-----------|
| G1 UK economic interest | 28 |
| SECTION H: Next steps and declaration | 35 |
| Next steps | 35 |
| Declaration | 35 |
| SECTION I: Checklist and appendices | 36 |



The scope of this review

Goods subject to review

The goods subject to review in this transition review are detailed in the following table¹:

| Product category number | Product category | Commodity codes |
|-------------------------|--|--|
| 1 | Non-Alloy and Other Alloy Hot Rolled Sheets and Strips | 7208 10 00, 7208 25 00, 7208 26 00, 7208 27 00, 7208 36 00, 7208 37 00, 7208 38 00, 7208 39 00, 7208 40 00, 7208 52 10, 7208 52 99, 7208 53 10, 7208 53 90, 7208 54 00, 7211 13 00, 7211 14 00, 7211 19 00, 7212 60 00, 7225 19 10, 7225 30 10, 7225 30 30, 7225 30 90, 7225 40 15, 7225 40 90, 7226 19 10, 7226 91 20, 7226 91 91, 7226 91 99 |
| 2 | Non-Alloy and Other Alloy Cold Rolled Sheets | 7209 15 00, 7209 16 90, 7209 17 90, 7209 18 91, 7209 25 00, 7209 26 90, 7209 27 90, 7209 28 90, 7209 90 20, 7209 90 80, 7211 23 20, 7211 23 30, 7211 23 80, 7211 29 00, 7211 90 20, 7211 90 80, 7225 50 20, 7225 50 80, 7226 20 00, 7226 92 00 |
| 4A | Metallic Coated Sheets | TARIC Codes: 7210 41 00 20, 7210 49 00 20, 7210 61 00 20, 7210 69 00 20, 7212 30 00 20, 7212 50 61 20, 7212 50 69 20, 7225 92 00 20, 7225 99 00 11, 7225 99 00 22, 7225 99 00 45, 7225 99 00 91, 7225 99 00 92, 7226 99 30 10, 7226 99 70 11, 7226 99 70 91, 7226 99 70 94 |
| 4B | Metallic Coated Sheets | CN Codes: 7210 20 00, 7210 30 00, 7210 90 80, 7212 20 00, 7212 50 20, 7212 50 30, 7212 50 40, 7212 50 90, 7225 91 00, 7226 99 10 TARIC codes: 7210 41 00 30, 7210 41 00 80, 7210 49 00 30, 7210 49 00 80, 7210 61 00 30, 7210 61 00 80, 7210 69 00 30, 7210 69 00 80, 7212 30 00 80, 7212 50 61 30, 7212 50 61 80, 7212 50 69 30, 7212 50 69 80, 7225 92 00 80, 7225 99 00 23, 7225 99 00 41, 7225 99 00 93, 7225 99 00 95, 7226 99 30 90, 7226 99 70 19, 7226 99 70 96 |
| 5 | Organic Coated Sheets | 7210 70 80, 7212 40 80 |
| 6 | Tin Mill products | 7209 18 99, 7210 11 00, 7210 12 20, 7210 12 80, 7210 50 00, 7210 70 10, 7210 90 40, 7212 10 10, 7212 10 90, 7212 40 20 |
| 7 | Non-Alloy and Other Alloy Quarto Plates | 7208 51 20, 7208 51 91, 7208 51 98, 7208 52 91, 7208 90 20, 7208 90 80, 7210 90 30, 7225 40 12, 7225 40 40, 7225 40 60 |
| 12 | Non-Alloy and Other Alloy Merchant Bars and Light Sections | 7214 30 00, 7214 91 10, 7214 91 90, 7214 99 31, 7214 99 39, 7214 99 50, 7214 99 71, 7214 99 79, 7214 99 95, 7215 90 00, 7216 10 00, 7216 21 00, 7216 22 00, 7216 40 10, 7216 40 90, 7216 50 10, 7216 50 91, 7216 50 99, 7216 99 00, 7228 10 20, 7228 20 10, 7228 20 91, 7228 30 20, 7228 30 41, 7228 30 49, 7228 30 61, 7228 30 69, 7228 30 70, 7228 30 89, 7228 60 20, 7228 60 80, 7228 70 10, 7228 70 90, 7228 80 00 |
| 13 | Rebars | 7214 20 00, 7214 99 10 |

¹ Please note that the list uses the same category numbers and category names as EU Regulation 2019/159 for those goods subject to review within this Transition Review. Product categories 3, 8, 9, 10, 18, 22, and 24, will not be transitioned and are therefore excluded from the list.



| | | |
|------|--|--|
| 14 | Stainless Bars and Light Sections | 7222 11 11, 7222 11 19, 7222 11 81, 7222 11 89, 7222 19 10, 7222 19 90, 7222 20 11, 7222 20 19, 7222 20 21, 7222 20 29, 7222 20 31, 7222 20 39, 7222 20 81, 7222 20 89, 7222 30 51, 7222 30 91, 7222 30 97, 7222 40 10, 7222 40 50, 7222 40 90 |
| 15 | Stainless Wire Rod | 7221 00 10, 7221 00 90 |
| 16 | Non-Alloy and Other Alloy Wire Rod | 7213 10 00, 7213 20 00, 7213 91 10, 7213 91 20, 7213 91 41, 7213 91 49, 7213 91 70, 7213 91 90, 7213 99 10, 7213 99 90, 7227 10 00, 7227 20 00, 7227 90 10, 7227 90 50, 7227 90 95 |
| 17 | Angles, Shapes and Sections of Iron or Non-Alloy Steel | 7216 31 10, 7216 31 90, 7216 32 11, 7216 32 19, 7216 32 91, 7216 32 99, 7216 33 10, 7216 33 90 |
| 19 | Railway Material | 7302 10 22, 7302 10 28, 7302 10 40, 7302 10 50, 7302 40 00 |
| 20 | Gas pipes | 7306 30 41, 7306 30 49, 7306 30 72, 7306 30 77 |
| 21 | Hollow sections | 7306 61 10, 7306 61 92, 7306 61 99 |
| 25.A | Large welded tubes | 7305 11 00, 7305 12 00 |
| 25.B | Large welded tubes | 7305 19 00, 7305 20 00, 7305 31 00, 7305 39 00, 7305 90 00 |
| 26 | Other Welded Pipes | 7306 11 10, 7306 11 90, 7306 19 10, 7306 19 90, 7306 21 00, 7306 29 00, 7306 30 11, 7306 30 19, 7306 30 80, 7306 40 20, 7306 40 80, 7306 50 20, 7306 50 80, 7306 69 10, 7306 69 90, 7306 90 00 |
| 27 | Non-alloy and other alloy cold finished bars | 7215 10 00, 7215 50 11, 7215 50 19, 7215 50 80, 7228 10 90, 7228 20 99, 7228 50 20, 7228 50 40, 7228 50 61, 7228 50 69, 7228 50 80 |
| 28 | Non-Alloy Wire | 7217 10 10, 7217 10 31, 7217 10 39, 7217 10 50, 7217 10 90, 7217 20 10, 7217 20 30, 7217 20 50, 7217 20 90, 7217 30 41, 7217 30 49, 7217 30 50, 7217 30 90, 7217 90 20, 7217 90 50, 7217 90 90 |

Any reference to the goods subject to review refers to the product categories and CN codes covered in the table above.

Please refer to the Notice of Initiation on the case file for the countries that are exempt from the existing safeguard measure.

Like goods

In addition to seeking information about your company's imports into the UK of the goods subject to review, this questionnaire will also ask about like goods that are produced in the UK. Any reference to '**like goods**' in this questionnaire refers to goods produced in the UK which are like the goods subject to review in all respects, or with characteristics closely resembling them.

Directly competitive goods



'Directly competitive goods' are goods produced in the UK which are directly competitive with the goods subject to review.

This can include goods that are not only similar to the goods subject to review, such as a different type or variety, but also includes goods that occupy a position of direct competition with the goods subject to review. A directly competitive good may be one that is substitutable with the goods subject to review.

When you are completing this questionnaire, please follow the instructions for each question to provide the appropriate information regarding the goods subject to review and the like or directly competitive goods by product category.



Instructions

Introduction

The Trade Remedies Investigations Directorate (TRID) of the UK's Department for International Trade will be carrying out a transition review of each trade remedy measure active under the EU system that the UK has decided to maintain after EU exit. This transition review will consider whether the safeguard measure is necessary to address the increase in imports and whether there would be injury to the UK industry if the measure was removed. The transition review will also consider whether the current safeguard measure should be extended.

We are seeking your cooperation as an importer to inform our review of whether the current safeguard measure should be maintained, varied, discontinued and/or extended. The information your company provides will help us to determine a fair and appropriate response.

As specified on the front page of this questionnaire, the POI covers the same period as the EU steel safeguards case (January 2013 – December 2017). The data requested in this questionnaire for the POI will be used to make a recommendation on whether the existing safeguard measure should be transitioned. The MRP covers the period following the POI (January 2018 – June 2020). The data requested in this questionnaire for the MRP will be used to make a recommendation on whether the existing safeguard measure should be reduced or extended.

Please provide all the information requested by **28 November 2020**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary.

Please note that if you do not provide a confidential version and a non-confidential summary (or a statement of reasons why you cannot provide this), TRID may disregard the information you give us. The following section provides further information on what you need to do.

If you are unable to complete the questionnaire within the required time, please contact the case team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension required and the reasons why. **Due to the restricted timeframe of this transition review, the case team's ability to grant extensions is very limited.** We will notify you of our decision. If we are able to accommodate an extension, a note to explain this will be placed on the public file.

Please also contact the case team if you have any questions about your response or if you have any difficulties in completing the questionnaire. For general information about trade remedies processes, please visit the following website:



<https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process>.

TRID investigates cases under the specific provisions in Part 9 of *The Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019* as amended by the *Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under the *Taxation (Cross-border Trade) Act 2018*.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes by the deadline.

Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header. It is your responsibility to ensure that the non-confidential version does not contain any confidential information.

Further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire can be found in our guidance on [how we handle confidential information](#).

All information provided to TRID in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 17 of the *Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019*) and kept in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

Providing information from subsidiaries or associated parties

Natural persons or legal persons (i.e. companies) are associated where they meet the following definition of “related persons” in Section 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies.

- If any of your subsidiaries or associated companies are also UK importers of the goods subject to review, they should **also** complete this questionnaire. Please make sure you provide your subsidiaries with access to this questionnaire.
- Where your subsidiaries or associated companies are not importers but are involved in the downstream sales of the goods subject to review or the like or directly competitive goods, your questionnaire response should include information from those companies.



If you have any queries about this part of the process, please contact the case team using the details provided on the cover of this questionnaire.

What happens next

Please upload your completed questionnaire responses and non-confidential versions of documents to our Trade Remedies Service at www.trade-remedies.service.gov.uk. You will receive an email confirming the documents have been uploaded successfully. Non-confidential responses will be placed on the public file and the case team will contact you if we need further information.

Once we have completed our review, we will publish our recommendation to the Secretary of State. Our final report will be published on our public file.

Further information on this process is available at:

www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#determinations-and-conclusion-of-investigations.

Verifying the information you supply

TRID will verify, as far as possible, the information provided to it. As part of this process we may conduct authentication visits. Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided. Within your response to this questionnaire, please provide all formulas and steps used in your calculations and keep a record of these and all related material/documentation to assist with any authentication visit.

If we need to verify information that you provide by visiting your premises, the case team will contact you.

Due to the current circumstances, it may not be possible for us to carry out authentication visits. We may carry out remote authentication instead. During remote authentication we do not visit your premises but verify your questionnaire responses remotely using audio/video calls and email exchanges. Remote authentication can be conducted over several weeks.

After the authentication, TRID will prepare a report and share a draft with you. TRID will then ask you to provide a summary of the information which should be kept confidential and the reasons why. We will prepare a non-confidential authentication report for the public record.



How to complete this questionnaire

Please read and follow all the instructions carefully. Your company is required to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To assist with authentication please retain all such documents, your completed annexes and any calculations made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why.
- If the answer to the question is "zero", "no", "none" or "not applicable", please write this rather than leaving the answer blank.
- Please complete the Excel annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact the case team immediately.
- If there is insufficient space in any part of the questionnaire to provide the details requested, please attach appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- For all numerical figures, where appropriate please express every third digit with a comma (e.g. '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Limit all sales/currency/income figures to two decimal places and use the appropriate currency symbol (e.g. £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.



SECTION A: Company structure and operations

A1 Identity and contact details

1. Please complete the table below ensuring that the point of contact given has the authority to provide this information:

| | |
|---|---|
| Legal name of company: | thyssenkrupp Materials (UK) Ltd |
| Legal structure (e.g. limited company, sole trader, partnership etc.) | Limited Company |
| Year of establishment: | 1959 |
| Other operating names: | Vetchberry Steels, thyssenkrupp Materials Trading UK, thyssenkrupp Aerospace UK, thyssenkrupp Mannex (UK) |
| Company registration number: | 645702 |
| Place of registration: | Cox's Lane, Cradley Heath West Midlands, B64 5QU |
| Name (point of contact): | [REDACTED] |
| Position: | Divisional Director of thyssenkrupp Materials Trading UK a division of thyssenkrupp Materials (UK) Ltd |
| Address: | Unit 1, Woking 8, Forsyth Road, Woking, Surrey, England GU21 5SB |
| Telephone No.: | [REDACTED] |
| Email: | [REDACTED] |
| Website: | www.thyssenkrupp-materials.co.uk |

A2 Company information

1. Please describe the role of your company in the UK market, for the goods subject to review (e.g. buying or selling agent, importer/distributor, importer/wholesaler, importer/retailer or importer/end user) and for the like or directly competitive goods.

| | |
|--|---------------------|
| <i>Importer/distributor / Material Stockholder</i> | |
| | Appendix reference: |

Please answer the questions 2 and 3 below about the internal structure of your company and any associations with other companies. Natural persons or legal



persons (i.e. companies) are associated where they meet the definition of “related persons” in Section 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

2. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure and all sites/locations involved in the importation, sales and distribution of the goods subject to review and the like or directly competitive goods.

thyssenkrupp Materials UK is 100% owned by Thyssenkrupp UK PLC who in turn is owned 100% by thyssenkrupp AG. The management structure and associated group companies is shown on the questionnaire in Annex 1

Appendix reference: None

3. Please provide the following information by completing **Annex 1 – Associated companies**:
- Include your company’s worldwide corporate structure and affiliations, including parent companies, subsidiaries and/or other associated companies.
 - If your company is the subsidiary of another company, please give the name of this company, as well as that of your company’s ultimate controlling entity, their registration number(s) and place(s) of registration.
 - Please provide the address of the company.
 - Please list the activities carried out by the company (e.g. manufacturing, administration, sales).
 - Indicate the shareholdings you have in the associated company and the shareholdings that the associated company has in your company.
4. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.

| Date | Legal form | Explanation of change |
|-------------------------|-------------------------|-------------------------|
| No changes last 5 years | No changes last 5 years | No changes last 5 years |
| | | |

+Add additional rows as required

5. List and explain all authorisations your company has been required to obtain to import, sell or to export the goods subject to review and the like or directly competitive goods. These may include licences, permits, permissions or mining concessions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

Aerospace have IPR authorisation (IP/0910/009/24)



Appendix reference:None

6. State whether your company is a member of a representative organisation, e.g. industry associations.

Not currently member of any representative organisations

Appendix reference:none

A3 Board members and principal shareholders

1. Please complete **Annex 2 – Shareholdings**, providing a list of all your company's shareholders that owned more than 5% of its shares during the POI. Where known, provide details of their activities. Also include, for the last five years:

- your company's registered capital;
- the scope of business; and
- the composition of the Board of Directors and/or shareholders, including their roles and rights.

Please provide this information for your company and all its predecessor legal entities.

Please see information in Annex 2 and articles of association A3-2 for scope of business

Appendix reference: None

2. If applicable to your company, please attach the latest copy of the following documents (in the original language and in English):

- articles of association and all related documents;
- business licence; and
- Proof of registration of the company with the competent authorities.

Please describe what you are submitting and provide appendix references for your attachments in the box below. Earlier copies from the date of establishment of the company until the present should be available upon request during the authentication process.

Please find attached current articles of association and company registration certificate no business licence is required.

Appendix reference:A3-2 a & A3-2b

A4 Operational links with other companies or persons

- Please indicate if your company has established long-term agreements with any companies located in the UK or in third countries for the production (e.g. subcontracting), supply and sale of the goods subject to review and like or directly competitive goods, or other licensing, technical patent or compensatory agreements. Include:
 - the name and address of the company; and
 - an explanation of the nature of the agreement

| Company name and address | Nature of agreement |
|--|--|
| Thyssenkrupp Steel Europe | Long term supply agreement |
| Yucel Boru ihracat ithalat ve paz a.s. Rihtim Caddesi No.44 Kadikoy, 347 16 Istanbul, Turkey | Long term supply and sale agreement for welded tubular goods (square, rectangular, circular, gas list) of yucelboru ihracat,ithalat ve pazarlama a.s. , yucel boru ve profil endustrisi a.s. and cayirova boru sanayi ve ticaret a.s |

+Add additional rows as required

A5 Accounting practices

- Please give the financial year convention your company uses for its accounts (e.g. 1 January – 31 December). If any changes have occurred with respect to your financial year convention or in your accounting practices over the POI and MRP, please describe these changes.

Financial year 1st Oct – 30th September. No changes made to convention over period of review

Appendix reference: None

- Please confirm what basis your accounts are prepared under, i.e. local GAAP, IFRS etc.

Accounts are prepared under FRS101

Appendix reference: None

- For your company and any associated parties involved in the importation, marketing or sales of the goods subject to review or the like or directly competitive goods, please attach a copy of your annual reports for the financial period that covers the POI and MRP. This should include a statement of financial position; statement of profit and loss and other comprehensive income; statement of changes in equity; cash flow statement; notes to the accounts and all reports; and auditor's opinion on these documents.



Please find attached copies of annual report for thyssenkrupp Materials UK for years ended Sept 13, Sept 14, Sept 15, Sept 16, Sept 17, Sept 18 and Sept 19. Please note that we do not report cash flow so this is not shown in the accounts.

There is currently no draft accounts available for year ending Sept 20. They are still in progress.

Appendix reference:A5-3a – A5-3g

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements and corresponding tax returns for the POI and MRP.

Not relevant – accounting information provided in question 3.

Appendix reference:None

5. Please attach a copy of your company's trial balance (in a spreadsheet) covering the POI and MRP. This includes:

- the trial balance which covers the full financial years from January to December for 2013, 2014, 2015, 2016, 2017, 2018, 2019; and
- the trial balance which covers the beginning of the financial year to the 1st July 2020.

In confidential version "Copy of trial balance FY2013 – FY2020 has been attached with Note that as Materials is 3 separate accounting divisions I do not have a complete trial balance for July 2020 but have provided September 2020" however this has been removed from non-confidential version as commercially sensitive.

Appendix reference:none

6. For your company and any associated parties involved in the importation, marketing or sales of the goods subject to review and the like or directly competitive goods, please attach copies of relevant management accounts and associated reports (e.g. profit and loss statement) for the profit centre of the goods. Please provide these reports for the POI and MRP.

In confidential version provided "management accounts of the two main group divisions importing goods subject to review mild steel division and materials Trading UK." It is company policy not to publish the results of individual divisions so this has been removed from the non-confidential version

Appendix reference: None

7. If your company is part of a group of companies, please also attach a copy of the consolidated accounts of the group for the POI and MRP.



Part of the thyssenkrupp ag group - Please see appendix for Annual accounts for Thyssenkrupp AG from 2013 - 20

Appendix reference: A5-7a – A5-7h

8. Please provide a detailed description, including the name(s) of the systems, of your financial accounting system explaining how sub ledgers (e.g. costing, debtors, creditors) integrate with the general ledger. Please provide a description of how it links with the management accounting system, including any manual interventions. Please also attach:
- your company's chart of accounts;
 - your company's cost centres; and
 - a brief description of further analysis codes available.

We use a SAP system using version EEC6 All the sub ledgers are fully integrated with the general ledger. Management reports are produced directly from the General ledger. You can only analyse by g/l account and cost centre no further analysis codes available. Chart of accounts and cost centre structure only available in confidential version

Appendix reference: None

9. If the accounting policies used by your company have changed over the POI and MRP, please explain the changes, including dates and reasons for them.

*Moved from UK GAP to IFRS 101 in Oct 2014
Adopted IFRS 9 Oct 18, Adopted IFRS 16 Oct 19*

Required changes for accounting standards

Appendix reference: none



SECTION B: About your goods

B1 Your company's products

In this section, you will be asked to provide details for your goods subject to review and like or directly competitive goods. **Please always refer to the corresponding product categories** which your goods subject to review and the like or directly competitive goods fall within.

The goods covered by this review are defined on pages 1 and 2.

1. Please comment on the scope of the review. If you consider that any product categories and/or custom codes should be added or removed, please explain the reasons why. Provide information about UK production, UK demand and UK imports for these product categories and/or custom codes. Substantiate with evidence.

The EU preliminary safeguard measures and the final definitive measures were introduced from July 2018 to protect the EU steel producers from the threat of injury in the event steel products were redirected to Europe due to Section 232 imposition of an immediate 25% tariff on steel imports to the USA market. The safeguard was to last for a period of 3 years and in accordance with WTO rules to be gradually liberalized.

The threat of redirection of steel from USA cannot be considered as a continuing threat given the time period during which the safeguards have been in place. We would contend that in order to extend the period of safeguard beyond the original 3 year period it should be clearly demonstrated that the grounds for the existence of the measure continue to exist and to demonstrate that an increase in imports has been clearly evidenced during the MRP and has been significant enough to threaten harm to domestic industry.

TRID should consider that steel products are differentiated from like goods in many cases by non price considerations.

TRID should also be aware that the UK production of a number of product categories are insufficient to satisfy the demand of the steel users within the UK. We would suggest therefore that tubular products falling under the product categories of 20, 21 and 26 should be considered for removal from scope.

Appendix reference:None

2. Please complete **Annex 3 – Goods I**, indicating which of the goods subject to review you imported during the POI by product category. Provide details for each product category and the comparable like or directly competitive goods. Please specify any differences between them.

Where possible, provide estimations of how prices of the like or directly competitive goods in the UK compare to the goods subject to review and reasons



for the price differences. In the box below, describe how you established the differences and substantiate with evidence.

Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each product category where available.

Steel products are not commoditised and cannot be readily differentiated from each other on the basis of commodity code alone.
Example HRC imported under category 1 and customs code 72083700 refers only to a flat product of 600mm or wider of a thickness 4.75mm to 10mm and not further worked than hot rolled. For specific end uses customers will need to specify a specific steel grade, thickness and width which in some cases is not produced within the UK, therefore imports cannot be readily compared by taric code to UK produced goods, nor can imports necessarily be differentiated purely on a price basis.
Typically goods are specified according to the relevant Euronorm, however these standards are wide ranging and in many cases customers will specify their detailed requirement with considerably tighter tolerances or specific requirements depending upon the end use than those permitted under the relevant standard. Steel users may have a preference in terms of a particular supply source, which is based on non price considerations for example the level of service provision, the degree to which the quality remains consistent according to the required standard or preferential stocking and delivery provision of preferential payment terms.
An example of this the the Scaluar product produced by thyssenkrupp steel Europe that is used as a substitute for cold rolled material attached is a data sheet explaining the product.

Appendix reference: B1-2a

3. Please complete **Annex 4 – Goods II**, indicating which of the like or directly competitive goods you purchased during the POI by product category. Provide details for each product category.

Not applicable.

Appendix reference:

4. Are the imported goods subject to review comparable in non-price factors (including product quality, lead and delivery times, reliability of supply etc.) to the like or directly competitive goods? Where possible, provide this information for the goods subject to review imported by your company and the comparable like or directly competitive good by product category and substantiate with evidence.

No the goods subject to the review are not always comparable in non-price factors to the like or directly competitive goods produced within the UK in some cases the grade and type of steels are not available from UK source. As in 2 an example of this is the Scaluar data sheets attached (substitute for cold rolled) and scaluar+ products

Appendix reference: B1-2a



5. Explain the internal coding system your company uses for the goods subject to review. If your company uses multiple internal reference codes across imports, sales and referencing, cross-reference each one.

Each product/steel grade/size has its own internal product code which is linked to each sale and purchase. Each purchase order is specifically linked to individual sales order. Where products are cut the parent batch information is preserved in the material history. More than 14000 product codes are utilized across the goods subject to the review.

Appendix reference:None

B2 Understanding the UK market

Answers should refer to the relevant product categories.

1. Do you regard the goods subject to review and the like or directly competitive goods to be an intermediate and/or final good?

intermediate

Appendix reference: None

2. Please explain the end use of the goods subject to review and the like or directly competitive goods in the UK market. If there are multiple uses for goods, list them and, where possible, estimate what proportion of your sales each represents.

The goods subject to the review are used in construction industry, automotive industry, shipbuilding and heavy engineering industry, white goods manufacture, yellow goods manufacture, modular buildings, furniture making, drum making, sandwich panel, purlin, floor decking and gratings manufacture, fire protection, HVAC industry, gas and water transmission, mechanical services, petrochemical, nuclear and renewables industries. Medical equipment ,Rail industry ,energy industry, aerospace and many more.

Appendix reference:None

3. Who are the general users/consumers/customers of the goods subject to review in the UK market? Please comment on whether this is the same/different for the like or directly competitive goods.

As detailed in response to question 2, the users/consumers and customers for the goods subject to the review in the UK market are many and ranging from large OEM's and construction procurement project managers to small fabricators within the supply chain.

Appendix reference:none

4. Please comment on the degree of price sensitivity of the goods subject to review and the like or directly competitive goods in the UK market?

End users will typically make their purchasing decisions based on the suitability of the product for the application in terms of detailed specification, preferred quality, delivery requirement and price and mill origin. It depends on the end customers needs.

Appendix reference:mpme

5. What distribution methods (i.e. sales channels) are used by your company for the goods subject to review? Comment, if known, whether this is similar for the like or directly competitive goods.

*Steel stockholders, steel service centres and processors and end users.
This supply chain is similar to our competitors in the UK*

Appendix reference:none

6. Please describe the nature of competition within the UK market (e.g. how many businesses are in the market, is the market highly price competitive?).

*There are a number of traders/importers and overseas steel producers operating in the UK market; it remains a competitive environment, although there are fewer independent steel traders than in the past. Many steel producers are operating their own direct sales in the UK market through their own steel service centres.
On the aerospace side there are equivalent aerospace materials stockholders.*

Appendix reference:None

7. Please describe the degree of competition between the goods subject to review and the like or directly competitive goods in the UK market?

There is competition between like or directly competitive goods, but as previously replied in reference to question B1 4 goods are not always comparable on purely a price basis. The commodity codes system pulls together items that are not directly competitive on grade and finish

Appendix reference:none

8. Please outline the trends and drivers of demand in the market for the like or directly competitive goods and the goods subject to review, including causes of demand fluctuations and any factors contributing to overall market growth or decline (e.g. user preferences, government policy, macroeconomic conditions)?



Dynamics of supply and demand at any particular time in a cyclical market environment, the level of restocking or destocking on the basis of current price trend, level of economic activity in volume steel industries for example automotive and construction, government investment in project businesses, barriers to trade including support of credit insurers and protectionist measures.

Appendix reference:None

9. Have there been any changes in the patterns of consumption of the goods subject to review in the POI and MRP in the UK market? Please elaborate.

Yes.
The EU safeguard measures determined the average import volume by country during the POI and determined the country specific quotas in order to limit the threat of injury to EU producers resulting from the redirection of volumes from those particular countries as a result of Section 232. In the event a country does not supply the volume permitted by the country quota, this volume is lost. In certain cases, as a result of change of circumstances, for example increased domestic demand, or loss of production, or increased demand in alternative export markets this has meant the availabilities from the named countries have become severely limited. The TRQ system does not allow steel users to secure their requirements from other sources where the "other countries" quotas are insufficient in volume, or already exhausted, other than to buy from domestic or EU sources.
No adjustments have been made during the MRP as a result of change in circumstance
Example: the signing of an agreement between USA and South Korea allowing steel imports up to an agreed volume into the USA outside of section 232, thus removing any potential to redirect volume to EU.
The country specific quotas also do not permit steel buyers to avail themselves of new supply opportunities which have been developed during the MRP
Example: New production of Organic Coated Sheets in Turkey where the quota for "other countries" is limited to 1,063mt in Q1 for all origins other than EU or South Korea.

Appendix reference:none

10. Please comment on whether there have been developments or changes in technology that have affected the UK market for the goods subject to review in the POI and MRP?

Development of renewable energy projects and particularly the movement toward off shore and larger wind power masts as well as the development and demand for electric vehicles will have an impact in the volume for steel products in these sectors. The market is demanding high finishes and technical requirements from the steel not currently readily available in the UK particularly in automotive and yellow goods markets



Appendix reference:none

11. Please describe whether the market is segmented? Does market segmentation in downstream markets cause the prices of the like or directly competitive goods and the goods subject to review to vary?

Market segments are described in answer to Question 2.

Appendix reference:none

12. Please describe the current state and forecasts of the UK and world markets for the goods subject to review and the like or directly competitive goods. Substantiate your comments with any documents, such as studies or articles in trade journals that support your statement.

The steel market in UK and EU is currently suffering from acute shortages of steel due to an increase in demand particularly in the auto sector, a lack of imports due in part to safeguard considerations, but also resulting from high demand for products in other global regions such as Asia as well as production limitations put in place during Covid 19 lockdowns, which cannot readily be reversed.

Please see supporting articles attached

Appendix reference:B2-12a

13. Provide any other information about the UK market for the goods subject to review and the like or directly competitive goods that may be relevant for this review?

UK market demand has been suppressed during the MRP due to uncertainty over the future trade relationship with EU and lack of clarity generally for many businesses particularly since March 2020 lockdown.

It is anticipated that government infrastructure spending and accelerated climate change ambitions particularly with regard to renewable energy and EV will provide a boost to the UK steel industry in terms of consumption, thus supporting the demand for the goods subject to the review. It is vital that these ambitions are not adversely affected by the restriction of availability of high quality imports which support healthy competition within the market. In particular product groups, the UK has insufficient domestic production capabilities to satisfy demand.

Appendix reference: None

SECTION C: Imports, purchases and stocks

C1 Imports and purchases

1. Please complete **Annex 5 – Imports** to provide details on the volume and value of the goods subject to review imported into the UK for the POI and MRP. Provide the value on a CIF basis and include information on importation costs. If this isn't possible please state clearly on what basis it is provided.

Please refer to the Notice of Initiation on the case file for the countries that are exempted from the existing safeguard measure and should not be included in the data provided on imports.

In the confidential version provided "Annex completed import figures. For 2013 and 2014 the exact breakdown by category is not fully available due to change of systems so some information has had to be estimated" due to group compliance rules actual tonnage and value could not be given. However shown indexed relative to 2013 values shown

Appendix reference: Annex 5

2. Complete **Annex 6 – Purchases** to provide information relating to your company's total annual purchases of the like or directly competitive goods produced in the UK over the POI and MRP. All figures should be reported net of tax.

Materials Trading and Mild Steel parts of the business only source from outside the UK. The Aerospace division purchase Aerospace grades from UK sources. Due to group compliance rules non-confidential version can't show actual tonnage and values. However shown indexed relative to 2013 values shown

Appendix reference: Annex 6

2. Describe how these purchases fit into your business model.

Requirements for special grades of material mostly for aerospace grades

Appendix reference:None

3. Describe how the resales of the like or directly competitive goods have developed during the POI and MRP.

unable to comment

Appendix reference:None



4. Please comment on the likely development of imports of the goods subject to review and purchases of the like or directly competitive goods by your company if the safeguard measure were:
- i) continued; or
 - ii) Discontinued.

If continued the development of import of goods from the rest of the world would be unchanged as little opportunity to increase as quota Tariff is so high however volumes from EU would probably reduce as pre Brexit no quota. If discontinued volumes of products not available from local sources would probably increase slightly from rest of the world but no change to EU volumes from pre-brexit levels.

Appendix reference:None

C2 Stocks and forward orders

1. Please complete **Annex 7 – Stocks** to provide details on stocks of the goods subject to review by product category for the POI and MRP.

In Confidential report stock information was provided but due to group compliance rules actual figures could not be provided in the non-confidential version. *However shown indexed relative to 2013 values shown*

Appendix reference: **Annex 7**

2. Please complete **Annex 8 – Forward orders** to provide details on forward orders and attach copies of forward contracts/ongoing supply agreements for the goods subject to review for up to one year ahead. Comment on these forward contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation?

For good imported from outside the EU a direct result of the safeguard measures it has been necessary to sell further forward than has traditionally been the case in order to ensure goods are available for customs clearance on the opening day of the next import TRQ period this has affected our business particularly in categories 20, 21 and 26, but the same effect has been seen in other categories such as 4B, 13 and 15.

Forward orders for mild steel division have increased due to recent lack of imports coming into the UK.

Import volumes have been restricted in 2020 as a result of

Covid 19 impacts on production as a result of lockdowns globally

Strong domestic demand in traditional exporting countries

High prices in other global markets compared to UK and EU

Limitations to import volumes through safeguard measures



Evidence of this can be clearly seen in ONS statistics of countrybycommodity import statistics for iron & steel with particular regard to India, Turkey, Taiwan and Vietnam

Appendix reference:C2-2A

SECTION D: Sales

D1 Sales and profitability

1. Please complete **Annex 9 – Sales** to provide details on total company sales. Also provide the sales volume and value of the goods subject to review by product category sold in the UK or re-exported for the POI and MRP. Please also provide the profitability of these sales and describe how this was calculated. To determine which sales fall into the POI and MRP, the invoice date should be used as the date of sale. If you are unable to use an invoice date, please contact the case team.

In confidential version "completed sales analysis was provided. Please note that a full breakdown is not available for 2013 & 2014 due to a change in systems for one division do these figures have been estimated based on actual totals to make the Profitability changes significantly depending upon if the material is sold by the trading business or the Aerospace business." Due to group compliance rules actual sales figures could be shared in non-confidential version however showed indexed relative to 2013 figures.

Appendix reference: **Annex 9**

2. Please comment on the likely development of your sales and profits of the goods subject to review if the existing safeguard measure on the goods subject to review were:
 - i) continued; or
 - ii) discontinued.Please substantiate with evidence.

If safeguarding measures continue it will significantly reduce sales and associated profit especially on the materials trading business. Having safeguarding on EU material will significantly effect the Mild Steel Business.

Appendix reference:None

D2 Sales incorporating the goods subject to review

1. Please complete **Annex 10 – Sales incorporating goods** to provide details on the volume and value of the goods produced by your company incorporating the goods subject to review sold in the UK or re-exported for the POI and MRP. Please also provide the profitability of these sales and describe how this was calculated. To determine which sales fall into the POI and MRP, the invoice date should be used as the date of sale. If you are unable to use an invoice date, please contact the case team.



As steel traders, stockholders and 1st stage processors we do not incorporate goods under review into products we sell.

Appendix reference:None

2. Please comment on the likely development of your sales and profits of goods incorporating the goods subject to review if the existing safeguard measure on the goods subject to review were:
- i) continued; or
 - ii) discontinued.
- Please substantiate with evidence.

In the event the safeguarding measures were to be continued beyond the current expiry date of 30th June 2021 it is likely that our sales volumes will continue to be adversely effected. The risk of importing goods that potentially become subject to a 25% duty upon arrival, in the event the TRQ is exhausted is a severe risk to our business and is completely disproportionate to the margin potential realizable for sale of the goods subject to the review.

Appendix reference:None



SECTION E: Company performance

E1 Employment

1. Please complete **Annex 11 – Company performance** to provide details on the employment for your company for the POI and MRP. Provide the number of employees in full-time equivalent roles (part-time employees should be included in the full-time equivalent). Also provide the median wages for these employees.

In confidential version unable to provide median salary figures so have supplied mean. Only able to provide total headcount per stat accounts in con-confidential version over information radacted

Appendix reference: **Annex 11**

2. Please comment on the likely development of your employment if the existing safeguard measure on the goods subject to review were:
 - i) continued; or
 - ii) discontinued.
 Please substantiate with evidence.

This is difficult to answer but the potential risk could be that the business has to downsize if the quotas are not sufficient for the UK demand. As the quotas will reduce the availability of high quality competitively priced material from EU this will probably mean that manufacturing is transferred to EU countries.

Appendix reference:None

E2 Other factors

1. Are there any other factors, relevant to your company, that you would like to comment on if the existing safeguard measure were:
 - i) continued; or
 - ii) Discontinued.



Please provide the information/data here. Substantiate with evidence.

None

Appendix reference:

2. Please comment on the likelihood of trade diversion to the UK if the existing safeguard measure were to be removed due to similar measures applied on steel goods worldwide, e.g. the US Section 232 measures and the EU safeguard measure.

the likelihood of trade diversion is unlikely due to the higher price of steel in USA

Appendix reference:None

3. Please comment on the future position of the UK industry if the existing safeguard measure were:

- i) continued; or
- ii) Discontinued.

Please substantiate with evidence.

A lack of enough high quality steel in the UK to meet the demand would hinder the growth of UK manufacturing

Appendix reference:None

SECTION F: Causation of injury

F1 Other causation factors

This review must examine factors other than trends in imports which may have caused or threaten to cause serious injury to the UK producers of the like or directly competitive goods.

The purpose of this section is to collect further information as to the cause of the alleged serious injury.

1. Aside from the increase in imports of the goods subject to review, please comment on, and substantiate with evidence, any other factors that may have caused serious injury or threaten to cause serious injury to the UK producers of the like or directly competitive goods. This may include:
 - contraction in demand or changes in the patterns of consumption;
 - restrictive trade practices of, and competition between, third country and UK producers;
 - developments in technology; and
 - export performance and productivity of the UK.

This list is non-exhaustive. Please add any additional information explaining the current state of the UK industry.

Lack of investment, changes in patterns of consumption, reliability of supply from UK producers cannot be guaranteed and performance is not improving.

Appendix reference:none

2. Please comment on the likelihood of the recurrence of serious injury if the existing safeguard measure on the goods subject to review were:
 - i) continued; or
 - ii) discontinued.Please describe the nature of any change and substantiate your claims with evidence.

as stated above we do not expect increase in trade division

Appendix reference:None

SECTION G: Economic interest

G1 UK economic interest

The Economic Interest Test assesses the economic impact of a measure compared to what would happen if it was not maintained. There are six factors which TRID must consider as part of the economic interest test:

- i) The serious injury caused by the importation of the goods in increased quantities to UK producers of those goods and the benefits to that industry of removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that TRID consider relevant.

The questions in this section will contribute to this assessment. **For questions in this section please provide information broken down by each of your company's sites/facilities, where relevant and possible. The data should cover January 2019 – June 2020 to allow for an assessment of the current economic situation and how it may develop.**

1. Where possible, please provide an overview of your supply chain for the goods subject to review, from raw materials through to final customers. Please describe the number, location and size of companies at each stage. If you have knowledge of the supply chain of the like or directly competitive goods produced in the UK, you may also provide that information.

thyssenkrupp Steel Europe produce steel from Raw Materials in Germany which is shipped to UK ports for distribution by our Mild Steel division to our UK and ROI customers

Non EU steel is imported by our Materials Trading divisionn from integrated steel producers or re-rollers or tube makers for supply to our UK and ROI customers.

Goods are imported through approximately 15 UK/ROI ports. A number of shipbrokers and vessel owners will be engaged for the sea transportation of goods. We utilise 10-15 stevedoring, warehousing and distribution specialists to handle cargo for the purposes of customs formalities, storage and haulage to customers warehouse.

Appendix reference:None



2. Please provide a breakdown by location for the employment figures provided in **Section E**. How would employment figures in certain locations be affected if the existing safeguard measure on the goods subject to review were:

- i) continued; or
- ii) discontinued.

Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years and explain the method used to calculate them.

Headcount figures Only in confidential version.

Safeguarding measures have a detrimental effect on the ability of our business to continue to trade in the goods within scope.

Were these measures to be extended, we would need to consider carefully the potential risk to the business compared to the achievable profits realizable in the importation and distribution of steel products.

No detailed analysis or projected estimations of the effect of an extension to the measures have been carried out.

Continuation of a safeguard measure should only be considered if there is substantive proof of increased import during the MRP and substantive injury to UK producers as a result of redirection of material to the UK market following the imposition of Section 232 and that this substantive threat remains in place.

Appendix reference:None

3. Please provide a breakdown by location for the wages provided in **Section E**. If you are unable to provide median wages, please provide mean wages. How would wages in certain locations be affected if the existing safeguard measure on the goods subject to review were:

- i) continued; or
- ii) Discontinued.

Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years and explain the method used to calculate them.

Not available

Appendix reference:none

4. If known, what fraction of domestic demand for the goods subject to review (by volume) does your company supply? How would your market share be affected if the existing safeguard measure were:

- i) continued; or
- ii) discontinued.

Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years and explain the method used to calculate them.



Non known

Appendix reference:none

5. Please comment on how significant imports of the goods subject to review are in relation to your company's overall volume of imports. Within your response, please state the share of total import value represented by the goods subject to review during the POI and MRP.

*Mild Steel – 100% single source from tk mills
Materials Trading – 95%
Aerospace – 30%*

Appendix reference:none

6. Please comment on any related industries that might be affected if the existing safeguard measure on the goods subject to review were (i) continued or (ii) discontinued? Please consider in particular:
- upstream industries – those who produce inputs needed for the like or directly competitive goods and/or goods subject to review; and
 - downstream industries – those who purchase the like or directly competitive goods and/or goods subject to review.

Upstream industries – UK is not a significant volume producer of the products within scope of the review. It is unlikely in our view that the safeguard measures have had significant impact on upstream industries.

Downstream industries would suffer from potential uncertainty of supply were the safeguard measures continued beyond the existing expiry date. These industries are substantial users of steel products, particularly in construction and automotive sectors, and are significant employers in the UK

Appendix reference:none

7. Which other industries may be affected if the existing safeguard measure on the goods subject to review were:
- continued; or
 - discontinued.
- Please substantiate your claims with evidence.

Automotive, construction, yellow goods, white goods, heavy engineering, renewable energy, HVAC, fire protection, mechanical services, Aerospace

Appendix reference:

8. Which other markets or products would be affected if the existing safeguard measure on the goods subject to review were:



- i) continued; or
- ii) discontinued.

This could include substitute products (such as margarine for butter) or complementary products (such as printers and ink). Please substantiate your claims with evidence.

In some cases steel products can be substituted by other products for example steel pipe may be substituted with plastic pipe. Continued limitation of the availability of the goods within scope could be detrimental to the development of the usage of goods within scope and might encourage substitution with a product which is less recycleable and could be detrimental to UK climate ambitions.

Appendix reference:none

9. Please describe how you would expect the following to be affected if the existing safeguard measure on the goods subject to review were (i) continued or (ii) discontinued:

- i) market price of the like or directly competitive goods in the UK; and
- ii) total UK output of the like or directly competitive goods.

Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years to support your claims.

We are currently seeing that a limitation of imports has a significant impact on market price, as there is insufficient UK production to satisfy steel user demand. In some cases like products are not available from UK producers, which may mean end users are required to substitute with inferior product as a result of import restrictions.

If current measures were continued, we would expect to see significant upward pressure on market price as we would not expect to see significant investment in new steel production capacity in the UK.

If current measures were discontinued at the current expiry date, steel users would be able to secure competitive pricing and to place business with their preferred supply source.

Appendix reference:none

10. Please describe how you would expect the following to be affected if the existing safeguard measure on the goods subject to review were (i) continued or (ii) discontinued:

- i) total imports of the goods subject to review to the UK; and
- ii) total exports from the UK.

Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years to support your claims.

If current measures were continued, we would expect to see



- (i) limited availability of imports for UK steel users
- (ii) limited exports from the UK due to manufactures not having availability of competitively priced products of the right grade.

Appendix reference:

11. To what extent would you expect any increase in costs for the goods subject to review to be passed onto end users? Please support your answer with evidence.

Any increases in market prices will need to be passed on to end users. It is impossible for those in the steel supply chain to absorb increased costs in view of the limited margins realized by steel importers, stockholders and processors.

Appendix reference:

12. How would plans for future UK investment or expansion be affected if the existing safeguard measure of the goods subject to review were:

- i) continued; or
- ii) discontinued.

If so, please provide detail by location with supporting evidence.

Future UK investment in road and rail infrastructure, wind and solar energy, EV network development, new housing and construction projects and UK manufacturing will be severely limited by lack of availability of competitively priced steel products.

Appendix reference:None

13. As a public body, TRID has an obligation under the *Equality Act 2010* to ensure that the possible effects of its activities on different people are considered. This Public Sector Equality Duty covers the following protected characteristics:

- age,
- disability,
- gender reassignment,
- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation.

If you have any information that could assist us in our consideration of whether the continuation of the existing safeguard measure might disproportionately affect any of these groups, please provide it in the box below.

We are not aware of any equality impacts of the safeguard measures.

| |
|-------------------------|
| |
| Appendix reference:none |

14. In terms of the competitive environment and structure of markets for goods in the UK, please answer the following questions in relation to how the continuation of the existing safeguard measure could impact:

- i) the number and range of suppliers of the like or directly competitive goods and/or the goods subject to review;
- ii) the ability of suppliers of the like or directly competitive goods and/or the goods subject to review to compete;
- iii) the incentives for suppliers of the like or directly competitive goods and/or the goods subject to review to compete vigorously; and
- iv) the choices and information available to UK consumers?

Specify by relevant product categories. Please provide evidence to support your answer.

| | |
|--------------------------|---|
| i) | Continuation of the measures would limit the ability of steel users within the UK to purchase competitively from a range of sources given the restrictions of TRQ by country of origin. |
| ii) | The safeguard measures based on average supply information by country of origin during the POI did not take account of limiting effects of anti-dumping measures introduced within the POI for example the exclusion of supply of metallic coated products from China under category 4A. UK producers of the like goods do not wish to compete in light gauges and low coating products which were being supplied from China. |
| iii) | UK producers with local delivery options for directly competitive product will achieve a price premium and preference over supplies from third country import which carries enhanced delivery risk from supply side production and logistics disruption and longer lead times. |
| iv) | UK consumers may rely on importers and/or their preferred suppliers to furnish information regarding supply choices and availability of options. |
| Appendix reference: None | |

15. Please describe the nature and degree of any regional impacts that you would expect if the existing safeguard measure on the goods subject to review were:

- i) continued; or
- ii) discontinued.

Please substantiate your claims with evidence.

| |
|--|
| <i>UK manufacturing would benefit from access to competitively priced, high quality steel product. For historic reasons many substantial steel users are located in the traditional industrial heartlands of North of England/Midlands and South Wales</i> |
| Appendix reference: |



16. If there are any additional economic factors that you consider to be relevant for the Economic Interest Test in this review, please provide details here and any supporting evidence.

none

Appendix reference:

SECTION H: Next steps and declaration

Next steps

Once you have completed all parts of the questionnaire the declaration below should be signed by an authorised signatory.

The questionnaire, spreadsheet annex and any appendices should be submitted through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 28 November 2020. The checklist in Section I of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire and related annex must be submitted. You can find guidance on how to complete confidential and non-confidential versions at <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information>.

Declaration

By signing this declaration, you agree that all information supplied in this questionnaire is complete and correct to the best of your knowledge and belief and understand that the information submitted may be subject to authentication by TRID.

Internal registration number:

Company name:

5/1/2021

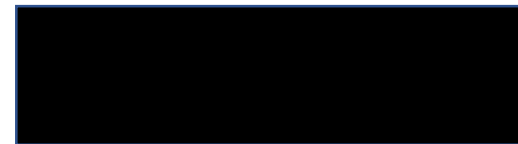
Date

Non available due to Covid
Working

Company stamp



Signature of authorised signatory



Name and title of authorised
signatory

SECTION I: Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

| Section | Please tick if you have responded to all questions |
|--|--|
| Section A – Company structure and operations | √ |
| Section B – Goods | √ |
| Section C – Imports and purchases | √ |
| Section D – Sales and selling expenses | √ |
| Section E – Company performance | √ |
| Section F – Causation of injury | √ |
| Section G – Economic interest | √ |
| Section H – Next steps and declaration | √ |

Please list any appendices that you have referenced throughout and are attaching along with this questionnaire.

| Appendix reference | Document title |
|--------------------|--|
| A3-2a | Materials Articles of incorporation |
| A3-2b | Thyssenkrupp Materials certificate of incorporation |
| A5-3a | Tkm(UK) annual report YE Sept 13 |
| A5-3b | Tkm(UK) annual report YE Sept 14 |
| A5-3c | Tkm(UK) annual report YE Sept 15 |
| A5-3d | Tkm(UK) annual report YE Sept 16 |
| A5-3e | Tkm(UK) annual report YE Sept 17 |
| A5-3f | Tkm(UK) annual report YE Sept 18 |
| A5-3g | Tkm(UK) annual report YE Sept 19 |
| A5-7a – A5-7h | Annual reports for thyssenkrupp AG group 2013 - 2020 |
| B1-2a | Tk Scalur product information sheet |
| B2-12a | Published British Steel Briefing |
| C2-2 | C2-2 Import history ONS |

+Add additional rows as required