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## Safeguard questionnaire<sup>1</sup>

### Safeguard measure 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:	21 November 2020
Case Team Contact:	Imogen Yapp, Lead Investigator, TF0006@traderemedies.gov.uk
Completed on behalf of:	
Party type ( <u>select</u> ):	<div><input type="checkbox"/> Contributor</div> <div><input type="checkbox"/> Government of relevant foreign country or territory (<i>Interested Party</i>)</div> <div><input type="checkbox"/> Trade or business association representing overseas exporters or UK importers of the good(s) subject to review (<i>Interested Party</i>)</div>

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<sup>1</sup> Excluding the following interested parties: Overseas exporters or UK importers of the good(s) subject to review and UK producers of the like good(s) or directly competitive good(s). These interested parties will complete questionnaires tailored to their specific party status.



Department for  
International Trade

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Trade Remedies Investigations Directorate

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X Trade or business association  
representing UK producers of like goods  
or directly competitive goods (*Interested  
Party*)



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

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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](http://www.trade-remedies.service.gov.uk)).



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## The scope of this review

### Goods subject to review

The goods subject to review in this transition review are detailed in the following table<sup>2</sup>:

Product category number	Product category	Commodity codes
<b>1</b>	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
<b>2</b>	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
<b>4A</b>	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
<b>4B</b>	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
<b>5</b>	Organic Coated Sheets	7210 70 80, 7212 40 80
<b>6</b>	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
<b>7</b>	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

<sup>2</sup> 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.



<b>12</b>	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
<b>13</b>	Rebars	7214 20 00, 7214 99 10
<b>14</b>	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
<b>15</b>	Stainless Wire Rod	7221 00 10, 7221 00 90
<b>16</b>	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
<b>17</b>	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
<b>19</b>	Railway Material	7302 10 22, 7302 10 28, 7302 10 40, 7302 10 50, 7302 40 00
<b>20</b>	Gas pipes	7306 30 41, 7306 30 49, 7306 30 72, 7306 30 77
<b>21</b>	Hollow sections	7306 61 10, 7306 61 92, 7306 61 99
<b>25.A</b>	Large welded tubes	7305 11 00, 7305 12 00
<b>25.B</b>	Large welded tubes	7305 19 00, 7305 20 00, 7305 31 00, 7305 39 00, 7305 90 00
<b>26</b>	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
<b>27</b>	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
<b>28</b>	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

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 include 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.

## 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 existing 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 existing safeguard measure should be extended.

We are seeking your cooperation as a contributor/an interested party to inform our review of whether the existing 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.

For further information please refer to our guidance on [How we carry out transition reviews into EU measures](#).

Please refer to our online guidance on the differences between interested parties and contributors: <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#interested-parties-and-contributors>.

Please provide all the information requested by **21 November 2020**. We may send a notice asking for clarification or supplementary information where necessary. Make sure you provide the sources for any information or data you don't own and clearly state any restrictions on sharing it.

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: [www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process](http://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 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 our public file, which is available on [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases).

## 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](http://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 investigation, 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](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#determinations-and-conclusion-of-investigations)

## How to complete this questionnaire

Please read and follow all the instructions carefully. You are required to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. Provide all formulas and steps used in your calculations and keep a record of these.

Please 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.
- 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, indicate this in the relevant answer and explain the variance from actual costs, if any.
- All financial figures should be reported net of tax unless otherwise stated.



Department for  
International Trade

## SECTION A: About the case

### A1 General information

1. Please complete the table below. Make sure the point of contact you name has the authority to provide this information.

Name (point of contact):	
Address:	
Telephone No:	
Email:	
Website:	

2. If you are representing an organisation, please also fill in the information below:

Company registration number:	
Place of registration:	England and Wales
Legal name of organisation:	
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited company
Position in the organisation:	
Year of establishment:	
Other operating names:	

### A2 Information about this review

This transition review will consider whether the existing safeguard measure is necessary or sufficient to address the increase in imports and whether there would be injury to the UK industry if the measure were removed and/or not extended. For each question, please provide any information you have which you feel is relevant to the case. If you have no information, please say so in your answer.

Please substantiate your answers with evidence. Any attachments should be given a corresponding appendix reference in the title of the document and referenced in the boxes provided.

1. Please provide any **information about the like or directly competitive goods and the goods subject to review** that you consider relevant.

*Our evidence is concerned solely with steel products used for the reinforcement of concrete:*

*Product category 13 commodity codes 7214 20 00 and 7214 99 10*

*Product category 16 commodity codes 7213 10 00 and 7213 91 10*

*All these codes apart from 7213 91 10 cover steel bars and rods with a particular pattern of raised ribs rolled into their surface, which makes them suitable only for the specific purpose of reinforcing concrete. Code 7213 91 10 covers smooth coil which is used for the reinforcement of concrete after further processing by cold rolling, to produce a ribbed surface. A significant proportion of this material is subsequently manufactured into sheets of welded mesh, again exclusively for the reinforcement of concrete.*

*All steel used for the reinforcement of concrete in the UK has to be certified for quality compliance with the relevant British Standards by CARES, the UK Certification Authority. It can only be supplied by overseas mills that have this certification. Increasingly, the UK market requires reinforcing steel to be additionally certified for Sustainability. The need for this certification limits the countries from which these steel products can be imported.*

*Since 2013 there has only been one manufacturer of these products in the UK. This manufacturer has also held a dominant position in the downstream fabrication of these products. This dominant position was achieved by the acquisition of three of the largest UK fabricators during a period when the UK had three producers of the relevant steel products. The closure of the other two steel manufacturers in 2008 and 2012, left the remaining producer in a dominant market position which has not been redressed, but which is clearly anti-competitive.*

*The independent fabricators, which includes all of our associations members, as well as some other companies, have no option but to import the majority of their steel requirements. The UK steel producer does not have sufficient capacity to supply the whole market. Its production capability is little more than the consumption of its own downstream fabricators, which make it both an unreliable and uncompetitive supplier to the rest of the fabrication market.*

Appendix reference: Appendix 7



2. 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 the UK production, UK demand and UK imports for these product categories and/or custom codes. Substantiate with evidence.

*The ribbed steel products supplied under tariff codes 7214 20 00/7214 99 10 and 7213 91 10 are essentially the same products packaged in different forms, bars and coils. They are used for the same purpose, yet appear in different product categories. There is a steady increase in the amount of coil being used as a substitute for bar for reasons of efficiency and yield. It would make more sense for these products to be combined under a single “ribbed steel” product category with the volumes for Product Groups 13 and 16 being adjusted accordingly.*

Appendix reference: Appendix 1

3. Please provide any information regarding the **surge in imports** of the goods subject to review **during the POI**.

*Imports of reinforcing steel bar increased in 2014 and 2015 due to a surge from China, but were balanced by a reduction in imports from other countries.. Chinese imports of bar were the subject of a European anti-dumping measure and disappeared from 2016 onwards.*

*Throughout the POI imports of steel for the reinforcement of concrete have remained reasonably constant at 50+/- 6% of the total market. This in turn reflects the UK producers share of the downstream fabrication market, which is around 50%*

*The UK market is to a large extent protected by the need for importers to have CARES accreditation for both product quality and sustainability. It can take around 12 months for a mill to attain this accreditation, which deters “casual “ imports.*

*It is our contention that overall there was no surge in imports of steel for the reinforcement of concrete during the POI*

Appendix reference: Appendix 2

4. Please provide any information regarding **imports** of the goods subject to review **during the MRP**.



*Data for H1 2020 is significantly affected by COVID 19 and we would not wish to draw any conclusions from it. It is supplied for information only.*

*For the remainder of the MRP imports of all reinforcing steel products have remained at around 50% of UK market consumption. We would therefore argue that there has been no surge in imports. Patterns of imports have been affected by the availability of quotas and the timing of its release. We would argue that for the UK market quotas should not be allocated on a specific country basis. The UK is already limited in its choice of suppliers and further constraints would be unhelpful.*

*We would also argue that because the cited products have only been produced by the one UK manufacturer, who uses the same production facility for each of these products, it is reasonable to consider them in aggregate.*

Appendix 3

5. Provide any information that could help us assess the **likelihood of an increase in imports** occurring if the existing safeguard measure for the goods subject to review were:
- i) continued; or
  - ii) discontinued.
- Provide evidence to support your conclusions.





*The UK market for reinforcing steel in the next three years is forecast to be strong due to major infrastructure projects, Hinckley C and HS2, together with a strong house-building programme. The Government's commitment to build its way out of the economic situation caused by COVID further supports this. It is quite feasible that domestic demand for the combined products will stabilise at around 1.3m tonnes. In this scenario we would expect that imports of steels for concrete reinforcement would need to increase in order to supply the UK construction industry without interruptions, which can be very costly. The ability of the UK's only current producer of these products to increase its production is seen as extremely limited. Virtually all UK production of these products is sold into the domestic market with only a limited regular export to Eire, where there is no domestic production.*

*If the Safeguard Measures are continued imports will need to continue at the historic levels, or above if the market continues to develop as expected. This will force fabricators to continue to place steel orders on longer lead times which is not efficient, and increases the risk of shortages in specific products resulting in delays to the construction industry. Appendix 4 shows historic UK production and demand. Even without any exports, which have typically run at 60kt per annum, the domestic producer can only supply around 50% of demand. The availability of stock from the domestic producer has been extremely poor and cannot be relied on.*

*If the Safeguard Measures are discontinued we would expect to see little change on the level of imports other than to accommodate any growth in the construction market.*

*Stocks will be better utilised improving reliability to the construction supply chain, and cash utilisation improved. We would not expect to see a surge in imports as many of the sources that were thought to pose a threat have found alternative markets in the Far East where demand is strong.*

*Extending the Safeguard Measure to include EU sources is an additional complication that the fabrication industry does not need. It will dislocate what has up till now been a mainstay of supply. We are also concerned that the mills themselves could take up some of the quota, further disadvantaging the independent fabricators and distorting competition. We would strongly urge that any purchases by the mills themselves, or their subsidiaries, should not count against any quota.*

Appendix reference: Appendix 4

6. Please provide any information regarding the **serious injury** to UK producers of the like or directly competitive goods **caused by the surge in imports** of the



goods subject to review **during the POI**. You can refer to our [guidance on how we assess injury](#) for a definition of serious injury.

*Prior to the commencement of the POI the UK producer was making significant losses. These losses continued at a similar level throughout the period of Chinese imports. When the Chinese imports stopped in 2016 the losses were reduced and a small profit was returned in 2017. It is difficult to argue that the Chinese import volumes caused the losses to occur. Any impact of the Chinese material would have been most likely in 2014 and 2015 when these imports were at their peak. However the company lost similar sums in 2012, when there were no Chinese imports and 2013 when they were present at a modest level.*

*Even when the Chinese imports stopped in 2016 the company made a small loss, followed by a small profit in 2017.*

*During the POI the lowest level of reinforcing steel imports was 414,592 tonnes in 2013, when the domestic producer made a loss of GBP 17.3m. The highest level of imports was in 2015 at 648617 tonnes, when the producer made a loss of GBP 17.3m. Thus an increase of over 50% in import levels had no effect on the producers profitability. It should be noted that a major fire at the producers UK plant in 2013 caused a major loss of production. The costs incurred by the fire were spread over a number of accounting years. While this event may have contributed to the level of loss it does not negate the conclusion that the level of imports has little, if any, effect on the company's profitability.*

Appendix reference: Appendix 5

7. Please provide any information regarding the **serious injury** to UK producers of the like or directly competitive goods **during the MRP**.

*For the majority of the MRP the European Safeguards have been in force, but even with this protection the domestic producer slipped back into loss in both 2018 and 2019. At the same time their market share was unchanged.*

*It is our view that the UK market, and its domestic producer, are already protected from surges in imports by the requirements for CARES quality and sustainability certification and that further protection with Safeguard Measures is both unnecessary and ineffective*

Appendix reference: Appendix 6

8. Please provide any information regarding the **likelihood of serious injury** to UK producers of the like or directly competitive goods if the existing safeguard measure for the goods subject to review were:
- i) continued; or
  - ii) discontinued.

Provide evidence to support your conclusions including what the cause of this injury would be.

*Capacity limitation and the structure of the reinforcement fabrication market will continue to limit the domestic producers market share to around 50%. Recent history shows that Safeguard Measures are ineffective in increasing either market share or profitability for the domestic producer.*

*On the other hand Safeguard Measures do cause problems for the reinforcement fabricators and for the construction industry by increasing lead times, necessitating more speculative purchasing and tying up more cash for longer periods. They also increase the risk of fabricators having to use non-sustainable sourcing simply to maintain continuity of supply.*

Appendix reference: 5 and 6

9. Provide any information you have on **other cause(s) of serious injury for the POI and MRP** to UK producers of the like or directly competitive goods. Clearly distinguish between the POI and MRP in your answer.

- 1. High electricity prices*
- 2. The structure of the reinforcing steel and fabrication markets in the UK. The sole producer having a dominant share of the fabrication market resulting in lower average selling/transfer prices.*
- 3. Lack of investment in the latest production technology.*
- 4. Localised production away from the main consuming markets leading to high distribution costs.*

Appendix reference: None

10. Please provide any information about the possible **economic effects** on the UK if the existing safeguard measure on the goods subject to review were:

- i) continued; or
- ii) discontinued.

This information will be used to assess whether the existing safeguard measure is in the economic interest of the UK as part of the economic interest test.

Provide evidence to support your conclusions.



All the products cited in this questionnaire are used exclusively for the reinforcement of concrete. Reinforced concrete is vital to the construction industry, particularly for major infrastructure projects.

Unless UK production of reinforcing steels is brought into better balance with UK demand imports will be essential to maintain the construction industry supply chain. Measures which complicate the importing process, causing delays and additional financing requirements, risk disruption to the construction supply chain. Construction is dependent on a just in time supply of fabricated reinforcement and the smooth flow of material throughout is of paramount importance. Any interruption to the supply chain leads inevitably to rapidly escalating costs.

Over the next decade the UK economy is going to be highly dependent on the construction industry, and measures that are likely to impede its progress without offering substantial benefits elsewhere should be avoided.

The UK reinforcement fabrication industry, through its use of the CARES schemes, has a track record of purchasing from quality suppliers of sustainable steel. This approach largely protects the UK from opportunistic imports of material diverted from other markets. The Safeguard Measures, at least as far as reinforcing steels are concerned, are counter productive. They obstruct the construction supply chain whilst giving little help to the domestic producer.

The production of reinforcing steel in UK accounts for less than 600 jobs, whereas reinforcement fabrication alone accounts for over 2000 directly employed jobs, and construction itself vastly more. Safeguard Measures are an attempt to disproportionately protect the 600 whilst threatening far more jobs downstream.

Appendix reference None

11. If you have **any other information** which may help us with this review, please provide it below.

*Nothing further add.*

Appendix reference:None

## **SECTION B: 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 should be submitted through the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by **21 November 2020**.

A confidential and non-confidential version of the questionnaire 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 that you understand that the information you submit may be subject to verification by TRID.

Company name (if applicable):

Company registration number (if applicable):

20th November 2020



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Date

---

Signature of authorised signatory

Andy Kirkcaldy  
Chairman

---

Company stamp (if  
applicable)

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Name and title of authorised  
signatory