

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:	DUFERCO UK LTD

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

☐ Confidential

X 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).

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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 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:	Duferco UK Ltd
Legal structure (e.g. limited company, sole trader, partnership etc.)	Private Limited company
Year of establishment:	1998
Other operating names:	
Company registration number:	03538773
Place of registration:	Bromsgrove
Telephone No.:	
Email:	
Website:	www.dith.com

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.

We are a steel trading and distribution company with 3 offices in the UK dealing in a variety of finished steel products for supplies of imported product to hundreds of steel stockholders, steel service centres, and end user customers. We sell pre-ordered steel on manufacturers lead times to customers specification as well as holding stock at ports and in warehouses for just in time delivery and provide buyers with extended finance and credit terms which most businesses need.

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.

The offices of Duferco UK Ltd are in Bromsgrove , London and Whitchurch.
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Appendix reference: Organisation Chart
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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
n/a		

+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.

n/a

Appendix reference:

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

ISTA – International Steel Trade Association
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Appendix reference:



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.

Duferco UK Ltd is owned 100pc by Duferco International Trading Holdings SA, Luxembourg
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Appendix reference: Annex 2

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.

n/a

Appendix reference: Duferco UK – Articles of Association Cert of Incorporation
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A4 Operational links with other companies or persons

1. 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
n/a	



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+Add additional rows as required

A5 Accounting practices

1. 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.

1 st October – 30 th September	Appendix reference:
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2. Please confirm what basis your accounts are prepared under, i.e. local GAAP, IFRS etc.

GAAP (Auditors Price Waterhouse)	Appendix reference:
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3. 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.

Audited accounts for Duferco UK from 2013 -2019 are available to view on Companies House website.	Appendix reference:
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4. If your accounts are unaudited, please attach a copy of your unaudited financial statements and corresponding tax returns for the POI and MRP.

n/a	Appendix reference:
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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.

n/a

Appendix reference:

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.

n/a

Appendix reference: A5.6 Duferco Annual Reports

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.

See annex

Appendix reference: Annex 1

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.

The ERP system is Oracle business suite which manage AP/AR/ inventory modules and GL. On a daily basis all data from modules are transferred to GL and in case of technical errors these are promptly communicated to accounting and IT teams. Modules are reconciled on a monthly basis with GL data and the whole process is audited by PwC every year.

Chart of accounts can be found in trial balances attached

Cost centers N/A

Appendix reference:

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.

No change occurred in POI or MRP

Appendix reference:



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.

We cannot comment about UK production as we are not a producer, nor do we buy from UK producers. For the products and the commodity codes that we trade in and import, UK production varies significantly. An example of this would be Hot Dipped Galvanised coil (product category 4); the UK market/demand is approximately 2.0 million MT per annum. UK production is approximately 500,000 MT per annum. Therefore, there is a requirement for approximately 1.5 million MT of imports.

The POI includes excessive imports of various stripmill products (product categories 1, 2, 4) from countries that now have separate tariffs defined, whether that be import duties, or quotas. Therefore, these countries, such as China, should not have been included when finalising the UK safeguard measures and import numbers.

For the record, since the UK quotas were announced for the first 6 months of 2021, the purchase prices for most stripmill products (HRC, CRC, HDG) have increased by up to 50% so far, due to lack of availability/imports leading to shortages in the UK market.

Update as per Deficiency Notice:

It is impossible to provide evidence as we are not a UK Producer, therefore how would we know definitive numbers regarding Production. These are only known by UK Producers of Strip Mill Products, namely Tata Steel for Hot Rolled Sheets and Strips (Product Category 1), Cold Rolled Sheets (Product Category 2) and Metallic Coated Sheets (Product Categories 4A and 4B) and Liberty Steel for Hot Rolled Sheets and Strips (Product Category 1). These also differ year to year. Given our position as one of the main Importers and Traders of Steel of Strip Mill Products (Categories 1,2, 4A and 4B) to the UK over the last 10 years, we can confidently state that many of our customers CANNOT fulfil their UK requirements from UK Steel and rely and depend on imports of steel from the Rest of the World, in these product category Groups.



We gave you an example of this in-sufficient supply / demand position with product category 4, where UK production and supply, only meets 25% of the UK demand. Import statistics can be sourced through International Steel Statistics Bureau (ISSB). Our experience, consistently importing strip mill steel over 25 years on a monthly basis clearly demonstrates this requirement.

Appendix reference:

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.

PRODUCT CATEGORY 1 – HOT ROLLED COIL
PRODUCT CATEGORY 2 – COLD ROLLED COIL
PRODUCT CATEGORY 4 – METALLIC COATED COIL
PRODUCT CATEGORY 7 – HOT ROLLED PLATE
PRODUCT CATEGORY 21 – HOLLOW SECTIONS

For the five product categories above, we import and sell based on true market levels, essentially set by domestic producers and EU imports. These can change very quickly or sometimes remain stagnant throughout the year. However, we do not set the price, only endeavour to sell at the market price to meet our delivery terms.

Update as per Deficiency Notice:

We do not have any brochures or catalogues to show. We source material based on customers enquiry and our long-term knowledge of where we can source that particular product from.

Appendix reference: Annex 3 Goods I

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.

N/a as we have not purchased from UK producers

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. For imported material, lead times are different, quality and technical specification of products often differ from UK produced material.

Update as per Deficiency Notice:

Domestic UK Steel Mills generally offer on a far shorter lead time, for placement of order to execution of delivery, than that of an Importer/Trader. UK Mills offer between 4-8 weeks, whereas Importers offer on 3 – 6 months, depending on where the steel is coming from. I have attached an annexe with timeline of steel / import trade to UK for guidance.

Many UK Customers : independent Steel Service Centres, request Structural Hot Dipped Galvanised Steel (Product Category 4A) – Grade S450GD – on a quarterly basis. This steel is used in steel framing for both industrial, commercial and residential buildings and housing. Tata Steel UK only make maximum of 5% of the annual requirement, therefore this product MUST be imported.

Appendix reference:

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.

n/a. We import and use the product category and commodity codes. We do not have a direct in-house coding system.

Appendix reference:

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?

Both intermediate and final goods – we sell finished steel products that are used by steel fabricators and manufacturers in construction, automotive, engineering and white and yellow goods manufacture. We also sell material that will be further worked, value added, by our customers whether that be through fabrication, or manufacturing (slitting, sheeting, rollforming, etc).

Appendix reference:



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.

For all Product Categories 1, 2, 4, 7, 12 – material is supplied to service centres/stock holders to be further processed for steel fabricators and manufacturers in construction, automotive, engineering and white and yellow goods manufacture.

Appendix reference:

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.

CONFIDENTIAL – We cannot disclose our customer's names and details. All of the customers mentioned compete with the UK producers downstream service centres.

Appendix reference:

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?

For all Product Categories 1, 2, 4, 7, 12 price levels are at similar levels to UK producers but generally with a longer lead time for products that the UK producers supply.

Appendix reference:

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.

Duferco UK sells directly to its client base offering forward and ex stock sales and extended credit payment terms. For product categories such as 1, 2, 7 the UK producers, namely Tata and Liberty sell direct and through their distribution company like ourselves.

Appendix reference:

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?).

For all Product Categories 1, 2, 4, 7, 12 – Domestic producers, European producers and Third Country producers compete directly subject to technical terms and lead times.

Update as per Deficiency Notice:

Market share changes per product. See accurate estimations below, based on our experience and regular feedback from over 50 customers in the product category groups....



Product Category 1 : UK Producers – Tata Steel / Liberty Steel supplying between 50-70% of the market requirements. Imports from EU/ROW fluctuates year-on-year between 30-50%.

Product Category 2 : UK Producers – Tata Steel supplying between 40-60% of the market requirements. Imports from EU/ROW fluctuates year-on-year also between 40-60%.

Product Category 4 : UK Producer – Tata Steel supplying between 20-25% of the market requirements. Imports from EU/ROW fluctuates year-on-year between 75-80%.

There are many, many different types of business within each market, for Category 1: Skip manufacture, general manufacture from coil to sheets, Yellow Goods market such as earth-moving equipment, tractors, internal and external generators, with customers such as JCB and Caterpillar.

For Category 2: Cold Reduced Coil can be used for further production into Tubes, for furniture, etc... for steel racking systems, used in all of our supermarkets, for automotive purposes in cars and for further production to Galvanised Coils.

For Category 4A and B: Metallic Coated Material can be further produced into Pre-Painted Organic Coated Sheets, into Tubular Products. There is a large requirement for the Automotive business. In addition, this product is used for internal walls and ceilings, ducting systems in commercial and industrial buildings. For Steel Decking and Purlins in Residential and Commercial Buildings and Housing.

Both Tata and Liberty have their own downstream distribution centres, who compete directly with the independent companies. There are hundreds of large, medium and small independent service centres and stockholders supplying over 50% of the market in these product groups.

Appendix reference:

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

For all Product Categories 1, 2, 4, 7, 12 – there is a high level of competition but as customers cannot buy all tonnes and specifications required domestically, they require additional tonnes from imports to fulfil domestic demand.

Appendix reference:

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)?

For all Product Categories 1, 2, 4, 7, 12 demand is driven by the market. We compete in construction, manufacturing, engineering, automotive, yellow goods and white goods, both in the private and government sectors. If more projects are approved, commissioned, whether that be government or private, demand



increases. The UK service centres will then contact both UK producers and main importers for those products depending on the specific enquiry. Generally most enquiries are fulfilled from both domestic production and imported goods.

Appendix reference:

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. Since the UK quotas were announced for the first 6 months of 2021, the prices have increased by up to 50% so far, due to lack of availability and shortages in the UK.

As stipulated earlier in this document certain countries/imports should not have been included in the POI as they are now regulated, and penalised with import tariffs/duties.

Appendix reference:

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?

n/a

Appendix reference:

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?

n/a

Appendix reference:

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.

For all Product Categories 1, 2, 4, 7, 12 prices have increased dramatically in the last 6 months. We believe this will continue throughout 2021 here in the UK, and there are going to be some major supply shortages in the product categories as a lot of this material is not produced domestically.

Update as per Deficiency Notice:

Demand in UK is currently strong for these steel product groups (1,2 and 4) and we have enquiries and orders already taking us into Period 4 of 2021, demonstrating this. Based on the specifications, a large majority of this material will have to be imported as there is no UK production, example Structural Metallic Coated Sheet (Category 4) in S450GD / Z275



Coating. Price appreciation can clearly be demonstrated by indices / indexes, such as MEPS, Argus and Platts.

Appendix reference:

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?

n/a

Appendix reference:

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.

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.

n/a as we do not purchase from UK producers
Appendix reference:

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

Our business model is simply to provide imported finished steel products demanded by UK customers and to ensure that goods are shipped on time and in ordered quality and quantity at the contracted prices.
Appendix reference:

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

n/a
Appendix reference:

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.



For all Product Categories 1, 2, 4, 7, 12 - If safeguard measures are continued after 30.06.21 without amendment from the country specific quotas based on an outdated time period between 2013-2017 then it will be damaging to our business and to those many UK businesses that we supply and support, at last count more than 250 companies for various products. We believe that quarterly country specific safeguard quotas for a small market like the UK are unnecessary and disproportionate and will lead to inflated prices for end users and regular shortages of supply. If there have to be quotas by product to protect domestic manufacturers, then we believe it should be assessed on the basis of recent import statistics going back no more than 3 or 4 years and without specific country limitations. The UK market needs imported steel for many reasons. Whether to provide supplies not available domestically in the product ranges, sizes or tonnages needed or because the users of steel need the support of imports and import suppliers to provide finance and credit line support to their businesses.

Safeguard measures were initiated in the EU as a protection measure/instrument to ensure that deflected exports from the US 232 safeguard did not land in the European Union. This clearly did not happen and there was no need for the safeguard measure! If safeguard measures are discontinued, we believe there will be no dramatic change in the level of imports into the UK. Imports into the UK have always met current demand of that market for that said quarter/year. We strongly believe and urge TRID to discontinue the safeguard measures after 30.6.21.

Appendix reference:

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.

N/A as all current stock has been custom cleared under EU quotas. It is our customers that stock the material in their warehouses after we have delivered from the docks.

Appendix reference:

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?

You can clearly see from the Annex attached that our main businesses are in product categories 1, 2, 4, 5, 7, 13, 21. We do not have any supply agreements either with steel mills or with UK customers. Essentially our material is purchased and imported to match an enquiry on a forward basis, for a said delivery period.



Our business levels, be that quantities imported or turnover, is based on price of steel, demand and supply sourcing. 2018, 2019 and 2020 have been extremely consistent all within 2% of each other.

Appendix reference: Annex 8

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.

Average profit margins by product and by country are assumed to 1.5% of sales price as per intragroup transfer pricing policy

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 the existing safeguard measures are continued, all importers, including us, will have to work with the limited quotas. We would anticipate that our sales and profits would decrease, and we would lose business and thus reduce employment accordingly. Every quarter we would have to be assured that there is sufficient quota to import. This invariably leads to insufficient material being available for our customers and their needs/requirements.

If the existing safeguard measures were discontinued, we believe responsible volumes of goods subject to review, would continue to flow into the UK to meet the demands of the market. There would not suddenly be a glut of unsold imports. In this scenario we believe our sales would increase and hopefully, our profits.

Appendix reference:

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.

n/a
Appendix reference:

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.

n/a
Appendix reference:

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.

Duferco UK employed between 15-25 staff during the POI. Median wages circa £35k pa.

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.

If the safeguard measures are continued on the currently designed basis then we may need to reduce the numbers of employees. Alternatively if the measures are discontinued and our business grows we would most certainly look to employ additional staff.

Appendix reference:

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.

n/a

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.

As stipulated earlier in this document, there has been no diversion of steel, shipped to the EU, that was originally destined for the USA. This did not happen. Each market and country have a total demand for the year, in the product categories under review,



which changes year on year. The UK do not produce enough steel to satisfy the UK domestic market demand, and have always relied upon imports to fulfil this demand, whether that be from the EU or ROW.

Appendix reference:

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.

Simply put, if the existing safeguard measures are continued, given the inability of domestic producers to meet market demand for volume, there will NOT be sufficient steel even to meet the CURRENT demands of the market, and worse, would severely jeopardise Government infrastructure projects such as HS2, etc.

If the safeguard measures are discontinued, this will enable sufficient supplies to be made available to meet the demand of the customers and their requirements. The customers need choice, whether that be from domestic production or imported material. Remembering that the current domestic supply only meets approx 50% of the demand.

Update as per Deficiency Notice:

he UK Demand for Categories 1,2 and 4 are approximately 7-8Million MT per annum, UK producers total 4.5Million MT, therefore there is a critical requirement for imported steel in these categories, which should not be threatened by Safeguard Measures.

Appendix reference:

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.

n/a
Appendix reference:

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.

We do not believe there will be any serious injury to domestic producers whether the safeguard measures are continued or discontinued.
Appendix reference:

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.

We negotiate with the producers/mills to supply to stockholders, service centres and fabricators throughout the UK. We import the material through all of the major deep sea ports in the UK such as Newport, Cardiff, Bristol, London, Liverpool, Hull. We also import steel through smaller sea ports such as Creeksea, Dover, Ellesmere, Goole, Belfast, Warrenpoint, Bromborough etc, where the cargo is discharged and stored in the port. Material at the ports is then distributed through the port agents to our customers in all parts of the country. All material is sold generally on a delivered duty paid basis in 25MT loads through road haulage. We provide income for the ports, warehouses, hauliers, surveyors, credit insurance market, banks, and marine insurance.

In addition most of our material is slit, cut, sheared, and fabricated by downstream manufacturers, adding value to the sector that they contribute to. This also provides huge employment to these sectors and to the final end users.

Appendix reference:



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.

If safeguard measures are continued, it may not only affect Duferco number of employees, but also any other company within the supply chain. As demonstrated in Section G1 we import to (Newport, Liverpool, Creeksea, Dover, Ellesmere, Goole, Belfast ports etc) and supply all over the UK, so all localities may be affected.

Additionally, there could be huge reduction in employment with downstream manufacturers, if safeguard measures were continued and we were limited by quotas to import requested material.

Appendix reference:

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.

Please answer here

CONFIDENTIAL – We cannot disclose salary/wages information. However, if the existing safeguard were continued it would be highly likely that we would hire less people, or need as many people, as our volumes and turnover would decline.

Appendix reference:

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.



For product categories 1, 2, 4, 7, 21 we estimate the UK domestic demand as 5 million MT. We currently import approx 150,000 MT which represents 3% per annum. If safeguard measures were to be discontinued, we believe our imports would increase by approx 20%. However, these additional tonnes are critical and needed in the UK as UK production/manufacturers do not make a lot of these sizes.

Appendix reference:

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.

Less than 5%

Update as per Deficiency Notice:

These product categories; 1,2,4A,4B,7 and 21 account for approximately 55% of our overall import value, during the POI and MRP.

Appendix reference:

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.

Related industries which may be affected if the safeguard measures continued, are the seaports, hauliers, stockholders, service centres, steel fabricators and manufacturers in construction, automotive, engineering and white and yellow goods manufacture, through to consumers.

By limiting the alternatives of supply to a market naturally the price increases. We have seen this significantly in the USA, over the last 2 years, since their 232 safeguard measure.

Appendix reference:

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.

n/a

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.

n/a

Appendix reference:

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.

Steel is a cyclical product and the UK is a very small part of a world steel market so prices are in large part determined by world events. However, it is clear that restricting freedom of choice and competitive import alternatives through quota it will have an artificial effect of inflating UK domestic prices to the end user.

Update as per Deficiency Notice:

I do not see UK output growing in the short or medium terms, therefore if UK Safeguard measures are continued, there will be shortages in all product groups.

Appendix reference:

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 the existing safeguard measures are continued, we believe there will be a reduced level of imports due to 1) quotas, 2) importers and traders not importing steel due to the risk of having to pay the prohibitive penalty of 25% import duty.

In addition, we import certain materials that will be fabricated and manufactured and then exported around the world. An example of this would be yellow goods materials, such as earth moving equipment, tractors, heavy machinery, etc. If



imports are negatively affected by quotas these exports would cease. Loss of revenue, tax, employment, skills.

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.

Increases in costs are almost always passed on to end users and consumers.

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.

As far as our customers are concerned shutting off regular import supplies will hurt their businesses so will inevitably result in loss of jobs and contraction of their businesses.

Appendix reference:

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.

n/a

Appendix reference:

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.

The UK steel demand outstrips what the UK can produce, so imports are vital to UK industry as otherwise the UK would be unable to fulfil contracts and could lead to closure of business and loss of jobs.

Appendix reference:

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.

n/a

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.

n/a

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: Duferco UK Ltd

Date

Signature of authorised signatory

Company stamp

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	Tick
Section B – Goods	Tick
Section C – Imports and purchases	Tick
Section D – Sales and selling expenses	Tick
Section E – Company performance	Tick
Section F – Causation of injury	Tick
Section G – Economic interest	Tick
Section H – Next steps and declaration	Tick

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

Appendix reference	Document title
Duferco UK – Articles of Association Cert of Incorporation Organisation Chart	Duferco UK – Articles of Association Cert of Incorporation Organisation Chart
A5.6 Duferco Annual Reports	Duferco FY17 Signed Accounts FINAL Duferco UK FY18 Signed Accounts FINAL Duferco UK Limited 30 Sep 2016 - Signed financial statements Duferco UK limited 30 Sep 2020 signed Duferco UK Limited Financial Statements FY 2019 FINAL Duferco UK Sept 13 audited signed Duferco UK Sept 14 audited signed Duferco UK Sept 15 audited signed

+Add additional rows as required