



Safeguard Questionnaire (Exporter)

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:	Acciaierie Valbruna SpA Viale della scienza 25 36100 Vicenza - Italy

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

☐ Confidential

☒ Non-Confidential – will be made publicly available

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



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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

This questionnaire also asks for information about goods which are **like** the goods subject to review. 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 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 foreign exporter 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.

If you are an exporter of the goods subject to review to the UK but do not produce these goods, please complete Annex I, as well as sections of the questionnaire you are reasonably able to answer. Furthermore, please provide the case team with contact details for the producing company of the goods subject to review.

Please provide all the information requested by **21 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:

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 will be stored 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 an exporting producer of the goods subject to review, they should **also** complete this questionnaire. Please make sure you provide your subsidiaries with access to this questionnaire.



- Please ensure that all your subsidiaries or associated companies are captured in Annex 1 and that they feed into responses to the rest of the questionnaires as relevant.

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.



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. 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:	ACCIAIERIE VALBRUNA S.P.A.
Legal structure (e.g. limited company, sole trader, partnership etc.)	Joint-stock Company limited by shares
Year of establishment:	As a business 1925 (current corporate entity 2008)
Other operating names:	None
Company registration number:	BZ-191346
Place of registration:	Bolzano, Italy
Name (point of contact):	[Limited – personal information]
Position:	Assistant Financial Director
Address:	Viale della Scienza 25 – 36100 Vicenza - ITALY
Telephone No.:	[Limited – shareholder information]
Email:	[Limited – shareholder information]
Website:	www.acciaierie-valbruna.com

A2 Company information

1. Describe the role of your company in the UK market for the goods subject to review (e.g. producer, producer/exporter or exporter/distributor).

Acciaierie Valbruna SpA is a leading manufacturer and exporter to the UK of the following product categories:

- Product Category 14 – Stainless Steel Bars and Light Sections (Heading 7222) and
- Product Category 15 – Stainless Steel Wire Rod (Heading 7221)

Appendix reference: N/A

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. What sites/locations are involved in the production, sales and distribution of the goods subject to review for domestic and export markets? Clearly indicate the



different production stages performed by your company and what stages others perform for you.

The goods subject to review that are exported to the UK market are manufactured by Acciaierie Valbruna SpA in its plants in Vicenza, Italy and Bolzano, Italy, and distributed worldwide by the Valbruna Distribution subsidiaries, including Valbruna UK Ltd. in the UK market.

All production stages from melting to final testing are performed by Acciaierie Valbruna SpA in its plants in Vicenza and Bolzano in Italy.

For different production stages performed by Acciaierie Valbruna SpA, please refer to **Appendix 1 – Manufacturing flow chart** **[Limited – confidential company information]**.

Appendix reference: [Appendix 1](#)

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.

Please refer to **Annex 1 – Associated companies** **[Limited – confidential company information]** and **Appendix 2 – Valbruna Group Network Brochure** for the above-mentioned information.

Appendix reference: [Appendix 2](#)

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
Not applicable	Not applicable	Not applicable
Not applicable	Not applicable	Not applicable

+Add additional rows as required

5. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the goods subject to review. 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.

Acciaierie Valbruna SpA has [Limited – confidential company information not susceptible of summary] corresponding to manufacturer of basic iron and steel and of ferro alloys. Please refer to [Appendix 3 – Excerpt from the Company Registry](#) [Limited – confidential company information].

Acciaierie Valbruna SpA is not subject to any quantitative or other restrictions on its activities. However, from a technical point of view, it has a total annual installed capacity of approximately [Limited – confidential company information not susceptible of summary].

Appendix reference: [Appendix 3](#)

A3 Board members and principal shareholders

1. Please complete **Annex 2 – Shareholdings**, providing a list of all your company's shareholders and board members that owned more than 5% of its shares during the POI. Where known, provide details of their activities and whether shareholders or board members have links to other stages of the supply chain.

Please refer to [Annex 2 – Shareholdings](#) [Limited – confidential company information] and [Appendix 3 – Excerpt from the Company Registry](#) [Limited – confidential company information].

Appendix reference: [Appendix 3](#)

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, 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
Valbruna UK Ltd. Oldbury Road, West Bromwich, West Midlands, United Kingdom	Distribution of the goods falling into product category 14 in the UK market

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.

Acciaierie Valbruna SpA's financial year convention has undergone a change over the POI and in the following year. In particular:

- Until 30.06.2017, the financial year was 1 July - 30 June. In the period 1 July 2017 – 31 December 2017 Acciaierie Valbruna SpA had an intermediate financial period (of six months only).
- Then, as of 2018, Acciaierie Valbruna SpA used the calendar year (1 January – 31 December) for its accounts.

Acciaierie Valbruna SpA is also the ultimate parent company of the Valbruna Group and the consolidated group accounts (please refer to **Appendix 7 – Consolidated financial statements [Limited – confidential information on the company's accounting and finance]**) have always been prepared on the basis of calendar year (1 January – 31 December).

Appendix reference: [Appendix 7](#)

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

Acciaierie Valbruna SpA's accounts are prepared under local (Italian) GAAP.

Appendix reference: [N/A](#)

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

Please refer to **Appendix 4 – Financial statements of Acciaierie Valbruna SpA [Limited – confidential information on the company's accounting and finance]** for the financial statements of Acciaierie Valbruna SpA that cover the POI and MRP.

Please refer to **Appendix 5 – Financial Statements of Valbruna UK Ltd. [Limited – confidential information on the company's accounting and finance]** for the financial statements of Valbruna UK Ltd that cover the POI and MRP.

Appendix reference: [Appendixes 4 and 5](#)

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

This question is not applicable, as all accounts of Acciaierie Valbruna SpA are audited.



Appendix reference: [N/A](#)

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.

Please refer to [Appendix 6](#) – Trial balances of Acciaierie Valbruna SpA for Acciaierie Valbruna SpA's trial balance covering the POI and MRP.

[Limited – confidential company information]

Appendix reference: [Appendix 6](#)

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

This question is not applicable, as Acciaierie Valbruna SpA does not hold separate accounts for the goods subject to review.

Appendix reference: [N/A](#)

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.

Please refer to [Appendix 7](#) – Consolidated financial statements **[Limited – accounting information is confidential and is not susceptible of summary]** for a copy of the consolidated accounts of the group for the POI and MRP.

Appendix reference: [Appendix 7](#)

8. 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.

This question is not applicable, as the accounting policies used by Acciaierie Valbruna SpA have not changed over the POI and MRP.

Appendix reference: [N/A](#)



SECTION B: About your goods

B1 Your company's products

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

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

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

The scope of the review should be redetermined based on the UK industry's actual output [Response to this question is entirely based on publicly available information, thus a limited version for this response is not needed.]

Outokumpu Sheffield Stainless Rod & Bar ("**Outokumpu Sheffield**") is the only significant manufacturer of products falling into products categories 14 and 15 in the UK and is part of the Outokumpu Group companies. Normally, Outokumpu Group can produce various types of stainless-steel bars and rods in its Sweden and United States plants. **However**, in its UK (Sheffield) plant, Outokumpu **only** manufactures a **limited range** of stainless-steel products (please refer to **Appendix 8** – Print screen from Outokumpu website, also [available here](#)).

As regards products of HS group **7222** falling into product category **14**, of 20 commodity codes included in this product category, **only 2** (perhaps 3) are manufactured by Outokumpu in the UK. Thus, in essence, no UK production exists for the vast majority of the products included in product category 14. The commodity codes that can be manufactured by the largest UK producers of stainless steel bars and light sections are indicated in bold in the table below:

Commodity Code	Description	Comments
7222 11 11	Bars and rods of stainless steel, not further worked than hot-rolled, hot-drawn or extruded, of circular cross-section of a diameter of ≥ 800 mm, containing by weight $\geq 2,5\%$ nickel	Large sized hot finished round bars. Outokumpu Sheffield cannot manufacture these products in the UK.



7222 11 19	Bars and rods of stainless steel, not further worked than hot-rolled, hot-drawn or extruded, of circular cross-section of a diameter of ≥ 800 mm, containing by weight $< 2,5\%$ nickel	
7222 11 81	Bars and rods of stainless steel, not further worked than hot-rolled, hot-drawn or extruded, of circular cross-section measuring < 80 mm and containing by weight $\geq 2,5\%$ nickel	Medium-small sized hot finished round bars. Outokumpu Sheffield cannot manufacture these products in the UK.
7222 11 89	Bars and rods of stainless steel, not further worked than hot-rolled, hot-drawn or extruded, of circular cross-section measuring < 80 mm and containing by weight $< 2,5\%$ nickel	
7222 19 10	Bars and rods of stainless steel, not further worked than hot-rolled, hot-drawn or extruded, containing by weight $\geq 2,5\%$ nickel (excl. such products of circular cross-section)	Hot finished non-round (square, flat, hexagon, etc.) bars. Outokumpu Sheffield cannot manufacture these products in the UK.
7222 19 90	Bars and rods of stainless steel, not further worked than hot-rolled, hot-drawn or extruded, containing by weight $< 2,5\%$ nickel (excl. such products of circular cross-section)	
7222 20 11	Bars and rods of stainless steel, of circular cross-section of a diameter ≥ 80 mm, simply cold-formed or cold-finished, containing by weight $\geq 2,5\%$ nickel	Large sized cold formed round bars. Outokumpu Sheffield cannot manufacture these products in the UK.
7222 20 19	Bars and rods of stainless steel, of circular cross-section of a diameter ≥ 80 mm, simply cold-formed or cold-finished, containing by weight $< 2,5\%$ nickel	
7222 20 21	Bars and rods of stainless steel, not further worked than cold-formed or cold-finished, of circular cross-section measuring ≥ 25 mm but < 80 mm and containing by weight $\geq 2,5\%$ nickel	Medium sized cold formed round bars of nickel grades. It is confirmed that Outokumpu Sheffield manufactures just a small subset of these products in the UK (up to 32 mm only, provided that the diameters 25-32 mm are actually manufactured in Sheffield)
7222 20 29	Bars and rods of stainless steel, not further worked than cold-formed or cold-finished, of circular cross-section measuring ≥ 25 mm but < 80 mm and containing by weight $< 2,5\%$ nickel	Medium sized cold formed round bars of ferritic/martensitic grades. These products are in practice not manufactured by Outokumpu Sheffield in the UK.



7222 20 31	Bars and rods of stainless steel, not further worked than cold-formed or cold-finished, of circular cross-section measuring < 25 mm and containing by weight \geq 2,5% nickel	Small sized cold formed round bars of nickel grades. These products are manufactured by Outokumpu Sheffield in the UK.
7222 20 39	Bars and rods of stainless steel, not further worked than cold-formed or cold-finished, of circular cross-section measuring < 25 mm and containing by weight < 2,5% nickel	Small sized cold formed round bars of ferritic/martensitic stainless grades. These products are in practice not manufactured by Outokumpu Sheffield in the UK.
7222 20 81	Bars and rods of stainless steel, not further worked than cold-formed or cold-finished, containing by weight \geq 2,5% nickel (excl. such products of circular cross-section)	Cold formed non-round bars of nickel grades. Outokumpu Sheffield manufactures in the UK only reinforcing bars, square bars and hexagon bars (no flat/rectangular shapes).
7222 20 89	Bars and rods of stainless steel, not further worked than cold-formed or cold-finished, containing by weight < 2,5% nickel (excl. such products of circular cross-section)	Cold formed non-round bars of ferritic/martensitic grades. These products are in practice not manufactured by Outokumpu Sheffield in the UK.
7222 30 51	Other bars and rods of stainless steel, containing by weight \geq 2,5% of nickel, forged	Forged bars are normally larger than 150 mm. Outokumpu Sheffield cannot manufacture such large bars in the UK.
7222 30 91	Other bars and rods of stainless steel, containing by weight < 2,5% of nickel, forged	
7222 30 97	Bars and rods of stainless steel, cold-formed or cold-finished and further worked, or hot-formed and further worked, n.e.s. (excl. forged products)	
7222 40 10	Angles, shapes and sections of stainless steel, only hot-rolled, only hot-drawn or only extruded	Outokumpu Sheffield cannot manufacture these products in the UK.
7222 40 50	Angles, shapes and sections of stainless steel, not further worked than cold-formed or cold-finished	
7222 40 90	Angles, shapes and sections of stainless steel, cold-formed or cold-finished and further worked, or not further worked than forged, or forged, or hot-formed by other means and further worked, n.e.s.	



As regards product category 15, corresponding to HS group 7221, out of 2 commodity codes included in this category only 1 (7221 00 10) can be manufactured by Outokumpu.

In addition to the above, Acciaierie Valbruna SpA submits that the UK production of goods falling in Product Categories 14 and 15 would be in any event insufficient to meet the UK demand. While some commodity codes indicated under these product categories are simply not produced by the UK industry, others may be occasionally produced by the UK industry in negligible amounts. However, in no way these producers could be considered regular players in the UK steel industry. It follows that, the imposition of safeguard measures on product categories 14 and 15 is likely to cause disruptions in the trade flows and serious shortages of supply in the UK, particularly because the UK domestic industry is unable to supply various types of stainless steel to the industrial users established in the UK. Acciaierie Valbruna SpA therefore respectfully request the termination of the measures with respect to product categories 14 and 15 or, in the alternative, the exclusion from the relevant tariff rate quotas of the commodity codes which are not manufactured in the UK.

Appendix reference: [Appendix 8](#)

2. Please complete **Annex 3 – Goods**, indicating which of the goods subject to review by product category are produced by your company. Where you have identified goods produced in the UK that are like or directly competitive to your goods subject to review, please indicate these and compare them to the goods subject to review. If known, provide names of UK producers of the like or directly competitive goods.

Where possible, provide estimations of how prices of the like or directly competitive goods produced in the UK compare to each of your goods 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.

All commodity codes classified under product categories 14 and 15 are produced by Acciaierie Valbruna SpA and **[Limited – sales information is confidential and is not susceptible of summary]** Technical documentation of the products manufactured by Acciaierie Valbruna SpA is provided in **Appendix 9 – Products manufactured by Acciaierie Valbruna SpA**.

As indicated in the response to question B1.1 above, the only significant UK manufacturer of products falling into product categories 14 and 15 is Outokumpu Sheffield Stainless Rod & Bar. However, as shown above, this producer can only produce in the UK the following products:



- **Product category 14:** subheadings number 7222 20 21 but only up to 32 mm (possibly less), 7222 20 31 and perhaps 7222 20 81
- **Product category 15:** only 7221 00 10.

In addition to the above, Acciaierie Valbruna SpA wishes to note that another UK producer of steel bars, i.e. Liberty Specialty Steel, mainly focuses on the production of alloyed steel bars, and only occasionally manufactures some stainless steel bars. This means that, in practice, this producer cannot be considered as a regular player in the UK market of stainless steel products included in product categories 14 and 15.

Appendix reference: [Appendix 9](#)

- Are the 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? Provide this information for each of the goods subject to review produced by your company and the comparable like or directly competitive goods and substantiate with evidence.

Yes, with the exceptions highlighted in the responses to the questions 2 and 3 above, it can be said that products falling into product categories 14 and 15 subject to review are comparable to the like or directly competitive goods.

Appendix reference: [N/A](#)

- Please provide a written summary and, if available, a diagram/flow chart, of your production process for each of the goods subject to review that you produce.

Please refer to Acciaierie Valbruna SpA's manufacturing flow chart in **Appendix 1 – Manufacturing flow chart**. **[Limited – confidential company information]**

Appendix reference: [Appendix 1](#)

- How does your company price the goods subject to review produced by your company? Provide this information for each of the goods subject to review produced by your company and substantiate with evidence.

[Limited – pricing information is confidential and is not susceptible of summary]

Appendix reference: [N/A](#)

- How does your company market (i.e. encourage sales of) the goods subject to review? Are you aware of whether similar methods are used for the like or directly competitive goods? Substantiate with evidence.

Acciaierie Valbruna SpA markets the goods subject to review in the UK as follows:



[Limited – sales and strategic business information is not susceptible of summary]

Appendix reference: N/A

B2 Understanding the UK market (optional)

Please answer the questions in this section and provide reasoning if you are able. Answers should refer to the relevant product categories.

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

Acciaierie Valbruna SpA regards the goods subject to review classified under Product category 14 as final goods and goods subject to review classified under Product category 15 as intermediate goods.

Appendix reference: N/A

2. 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 you have identified in Annex 3 – Goods.

General users/consumers/customers in the UK market of the goods falling into

- Product category 14 are generally UK companies manufacturing parts to be used in highly corrosive environments especially for the aerospace, defence, oil & gas, energy, auto-parts, medical, etc. and UK stainless steel stockholders selling to them;
- Product category 15 are generally UK companies manufacturing stainless steel cold drawn wire or bars (depending on the size).

The same applies to the goods identified in **Annex 3 – Goods** [Limited – confidential company information].

It is important to note here that the UK market for these two product categories is very integrated with the EU markets, particularly in terms of supply chain. In essence, imports of products classified under Product Categories 14 and 15 into the UK are an important source of supply for domestic users. This is particularly the case for imports from the EU Member States, because imports from the EU are more reliable than other countries due to its geographical location and its stable production facilities. Moreover, it is widely known in the stainless steel market that stainless steel produced by EU-based producers are of better quality than those produced by non-EU countries. Considering that Outokumpu Sheffield, the only UK-based producer of the products classified under the Product Categories 14 and 15 is able to produce only a small portion of the entire product scope (please refer to **Appendix 8 – Print screen from Outokumpu website**), it is evident that the stainless steel products imported from



the EU Member States simply fill the vacuum left by the UK domestic industry. Therefore, these pre-established and long-lasting supply lines would be inevitably disrupted, both qualitatively and quantitatively, should import quotas on these product categories continue to apply in the UK.

Appendix reference: [Appendix 8](#)

3. 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.

Generally, the goods subject to review falling into product category 15 are fairly price sensitive, whereas the goods subject to review classified under product category 14 are less price-sensitive and non-price factors, such as quality, stock availability, delivery time, product certifications are more important.

Appendix reference: [N/A](#)

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

The only significant UK producer of goods falling into product categories 14 and 15 is Outokumpu Sheffield Stainless Rod & Bar. However, as demonstrated in **Section B.1.1** above, this producer only manufactures a very limited range of products in the UK and focuses on nickel stainless steel grades, i.e. types of stainless steel containing at least 2.5% of nickel. Considering that the UK domestic industry provides for only a negligible level of production of products classified under product categories 14 and 15, the degree of competition between the goods subject to review and the like or directly competitive goods in the UK market is not significant. **[This response is based on publicly available information; thus, a limited version for this response is not needed.]**

Appendix reference: [N/A](#)

5. 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.

Due to the COVID-19 pandemic (and also to the slowdown of the aerospace and oil and gas sectors) the UK and world markets of products falling under product categories 14 and 15 are fairly slow, but a recovery is expected starting from 2021 if the pandemic situation improves.

Appendix reference: [N/A](#)

6. Please use the box below to 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.



As mentioned in **Section B.2.2** above, The UK market for product categories 14 and 15 is – to a large extent – **closely integrated** with the EU market due to various reasons, including but not limited to i) limited production scope and capacity in the UK domestic industry, ii) long-standing supply chain of stainless steel products between the EU and the UK, iii) geographical proximity of the EU producers vis a vis the UK users, and iv) the high level of stability and quality of the EU stainless steel producers.

In light of all these factors, Acciaierie Valbruna SpA submits that the application of tariff rate quotas against imports of the goods subject to review falling under the Product Categories 14 and 15 would severely disrupt the trade flow and harm UK domestic industrial users and end-customers of stainless steel. Moreover, introduction of such import quotas to imports from the EU countries would hamper the long-standing relationship between UK and EU trade partners. Therefore, should the UK decide to continue tariff rate quotas, those quotas should at least be rebalanced in favour of the EU countries, taking into consideration objective indicators, such as the UK's domestic production scope & capacity, as well as the EU's traditional trade flow and stable supply lines.

Appendix reference: N/A



SECTION C: Sales and profits

C1 Sales and profitability

1. Please provide the sales volume and sales value before tax in **Annex 4 – Sales** for the POI and MRP.
 - Please differentiate sales on the domestic market, sales to the UK market and sales to third countries of the goods subject to review for the POI and MRP. Include goods that you have produced and goods that you have purchased and resold.
 - Please ensure that you correctly categorise each sale by product category (a table is provided for each good subject to review).
 - To determine which sales fall within 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.
2. Please provide the profit before tax for sales of the goods subject to review in **Annex 4 – Sales** for the POI and MRP. Specify how you have calculated profitability.

Please refer to **Annex 4 – Sales**. [Indexed (by selecting a random cell in each row and considering it “100”, and then calculating the rest of the cells in the same row accordingly) – confidential business information on the sales of the company]

[Limited – information on the company’s profitability is not susceptible of summary]

Appendix reference: [N/A](#)

3. Please comment on your future forecasts for sales of the goods subject to review to the UK if the existing safeguard measure were to be removed. Please attach evidence to support your answer where possible.

If existing safeguard measures against imports from EU countries were to be removed with regard to imports of products falling into product categories 14 and 15, users in the UK would have the possibility to purchase the products at stake from various sources of supply in third countries. This would be very important especially with respect of certain stainless-steel bars and light sections falling into product category 14 which, as seen above, are not manufactured in the UK.

Appendix reference: [N/A](#)



SECTION D: Information on each of the goods

The relevant annex for this section is Annex 5 – Product category data. Please provide the information requested in Section D and Annex 5 for each of your goods subject to review by product category.

D1 Production and production capacity

1. Please provide the production volume, production capacity and capacity utilisation for each of the goods subject to review per product category produced by your company in **Annex 5** for the POI and MRP. Figures should include the goods subject to review sold by your company and goods subject to review used internally for further processing.

Describe the method used to calculate production capacity (e.g. number of shifts, working days per year, name plate versus actual capacity, idle time for machinery maintenance and changes in the production process etc.) and capacity utilisation.

Please refer to **Annex 5 – Product Category Data** [Indexed (by selecting a random cell in each row and considering it “100”, and then calculating the rest of the cells in the same row accordingly) – Confidential business information regarding the company’s products].

As explained in **Appendix 1 – Manufacturing flow chart** [Limited – confidential company information], [Limited – confidential information on production and product strategy is not susceptible of summary]

Appendix reference: [Appendix 1](#)

2. Indicate what products are produced on the same equipment and whether production can be switched to other products.

[Limited – confidential information on production and product strategy is not susceptible of summary] Please refer to Acciaierie Valbruna SpA’s manufacturing flow chart in **Appendix 1 – Manufacturing flow chart**. [Limited – confidential company information]

Appendix reference: [Appendix 1](#)

3. Please explain the allocation method used for production capacity.

[Limited – confidential information on production capacity is not susceptible of summary]

Appendix reference: [N/A](#)



4. Please comment on your future plans for production and capacity of the goods subject to review if the existing safeguard measure were:

- i) continued; or
- ii) discontinued.

Please attach evidence to support your answer where possible.

Acciaierie Valbruna SpA currently does not plan to increase or decrease the production and capacity of the goods subject to review. However, depending on the outcome of the present investigation and the limitations in the importation of the goods subject to review, Acciaierie Valbruna SpA would have to adapt its production plans depending on the continuation or removal of safeguard measures applicable to imports of products falling under product categories 14 and 15.

Appendix reference: N/A

D2 Stocks

1. Please provide information on stocks for each of the goods subject to review per product category produced by your company in **Annex 5** for the POI and MRP.

2. Please comment on the likely development of stocks of the goods subject to review if the existing safeguard measure were:

- i) continued; or
- ii) discontinued.

Please attach evidence to support your answer where possible.

Please refer to **Annex 5 – Product Category Data**. [Indexed (by selecting a random cell in each row and considering it “100”, and then calculating the rest of the cells in the same row accordingly) – Confidential business information regarding the company’s products]

With regard to the development of stocks, Acciaierie Valbruna SpA currently does not plan any action on the stocks of the goods subject to review. However, depending on the outcome of the present investigation and the limitations in the importation of the goods subject to review, Acciaierie Valbruna SpA would have to adapt to each of the scenarios indicated above.

Appendix reference: N/A.

D3 Captive use

1. Please provide information on captive sales for each of the goods subject to review per product category produced by your company in **Annex 5** for the POI and MRP detailing your company’s individual transfers of the finished goods for internal or captive use.



- Please comment on whether your captive use of the goods subject to review has changed over time and what has caused the changes. Please attach evidence to support your answer where possible.

Please refer to **Annex 5 – Product Category Data**. [Indexed (by selecting a random cell in each row and considering it “100”, and then calculating the rest of the cells in the same row accordingly) – Confidential business information regarding the company’s products]

[Limited – confidential information on production and product strategy is not susceptible of summary]

Appendix reference: [N/A](#)

D4 Consumption in domestic market

- Please estimate the development of consumption in your domestic market for each of the goods subject to review by product category produced by your company using actual knowledge, forecasts or ‘best estimates’ in **Annex 5** for the POI and MRP.
- Please provide forecasts for consumption over the next four years of the goods subject to review in the domestic market, UK market and rest of the world. Support your forecasts with evidence.

Please refer to **Annex 5 – Product Category Data**. Please note that the consumption data requested to be reported by Acciaierie Valbruna SpA in **Annex 5 – Product Category Data** [Indexed (by selecting a random cell in each row and considering it “100”, and then calculating the rest of the cells in the same row accordingly) – Confidential business information regarding the company’s products] covers the consumption of Product Categories 14 and 15 in the EU 28 (i.e. the total volume of PC 14 and 15, produced by the EU mills and imported from third countries, and consumed in the **28 EU member states**).

While it is very difficult to make forecasts for the next 4 years, one can reasonably expect a stronger consumption rebound worldwide for product categories 14 and 15 in 2021, following the recovery of the impact of the slowdown caused by the COVID-19 pandemic in 2020.

For the following 3 years, the market worldwide is expected to go back to an average annual growth of 2,5-3,0% per year (possibly higher in China).

Appendix reference: [N/A](#)

D5 Global capacity and production



1. Please comment on the current situation of global capacity and production of the goods subject to review by product category in your domestic market and the rest of the world.

There is currently an over-capacity for stainless steel products falling into product categories 14 and 15, especially in Asian countries such as India and China. However, this over-capacity does not constitute a threat to the UK domestic stainless steel industry, since – as indicated in **Sections B.1 and B.2** above – the UK domestic industry cannot produce the majority of the goods subject to review and classified under product categories 14 and 15. Therefore, Acciaierie Valbruna SpA reiterates its position that the UK should not introduce any safeguard quotas for the goods subject to review falling under product categories 14 and 15.

As a subordinate ground, in case the UK nevertheless decides to keep import quotas for these product categories, Acciaierie Valbruna SpA submits that any threat to the UK domestic industry caused by such over-capacity in Asian countries can be further avoided, if the safeguard quotas would be re-balanced in favour of the EU countries. While Acciaierie Valbruna SpA is aware that any safeguard measure that would be imposed by the UK would be imposed to all countries (*erga omnes*), Acciaierie Valbruna SpA invites the UK Government to give due consideration to the significant market share of the imports from the EU, and the traditional supply chains that are currently under the threat of a setback as a result of the potential import quotas.

Appendix reference: N/A

2. Please comment on foreseeable developments over the next four years of global capacity and production of the goods subject to review by product category in your domestic market and the rest of the world. Where possible, support your answer with evidence using actual knowledge, forecasts or 'best estimates' based on experience.

In the next four years global capacity and production should remain relatively stable in Europe and North America and increase in Asia, especially in India and China.

Appendix reference: N/A

3. Please comment on how global capacity and production of the goods subject to review by product category may change if the existing safeguard measure were:
 - i) continued; or
 - ii) discontinued.

Please attach evidence to support your answer where possible.

No substantial changes in the global capacity and production of the goods subject to review would occur independently of the decision to continue or discontinue the existing safeguard measures.

Appendix reference: N/A



SECTION E: Other questions

E1 Other causation factors

This review must examine factors other than trends in imports that 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 regarding 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 for the POI. This may include:
 - contraction in demand or changes in patterns of consumption;
 - restrictive trade practices of, and competition between, third country and UK producers;
 - developments in technology; and
 - export performance and the productivity of the UK.

Acciaierie Valbruna SpA submits that any serious injury to the UK stainless steel industry manufacturing products falling into product categories 14 and 15 may have occurred as a result of the COVID-19 pandemic and the current negative trends in the aerospace and oil and gas industries.

Appendix reference: N/A

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.

Acciaierie Valbruna SpA is of the opinion that imports of stainless steel bars and light sections into the UK have not caused nor are causing serious injury to UK producers of products falling into product categories 14 and 15. accordingly, no injury would recur should safeguard measures be discontinued with respect to product categories 14 and 15.

Appendix reference: N/A

E2 Other questions



1. Please describe how you would expect each of the following to be affected if the existing safeguard measure on the goods subject to review were (i) continued or (ii) discontinued:
 - your production of the goods subject to review; and
 - your exports of the goods subject to review to the UK.

Please provide estimates for the next four years (e.g. projections or forecasts) to support your claims.

Acciaierie Valbruna Spa submits that, should the UK continue the existing safeguard measures on goods classified under Product Categories 14 and 15, stainless-steel producers established in the EU member states, who have strong and traditional ties of supply with the stainless-steel users established in the UK, will be negatively affected.

Acciaierie Valbruna SpA re-emphasises that the UK and the EU stainless steel markets are closely integrated, and that any safeguard measure should be at least rebalanced in favour of the EU countries given the long-standing supply-chain relationship, should the UK aims to protect the interests of all stakeholders in the market, including the industrial users and customers and not only limited to the domestic producers. In the opposite scenario, exports of stainless-steel from the EU into the UK would be in fact limited to the detriment of users in the UK.

Appendix reference: N/A

2. Please describe how you would expect each of the following to be affected if the existing safeguard measure on the goods subject to review were (i) continued or (ii) discontinued:
 - development of the UK industry; and
 - market price of goods in the UK.

Please provide estimates for the next four years (e.g. projections or forecasts) to support your claims.

Development of the UK industry

If the existing safeguard measure on the goods subject to review were continued, the stainless steel users established in the UK would be negatively affected. As a matter of fact, they would experience shortage of supply due to the inability of the UK domestic industry to produce most of the subheadings listed under product categories 14 and 15.

If, on the contrary, the existing safeguard measures were discontinued, users in the UK would be able to rely on imports to meet their demand for products falling under product categories 14 and 15 which are not manufactured in the UK, as they are to a large extent doing today.

Market price of goods in the UK



If the existing safeguard measure on the goods subject to review were continued, the UK domestic industry would gain a dominant position in the UK stainless steel market and could easily adjust prices of stainless steel at a higher level. This would inevitably jeopardize the economic situation of UK users, which highly rely on imports (especially as regards products which are not manufactured by UK producers).

If, on the contrary, the existing safeguard measures were discontinued there would be essentially no change in the current price situation on the UK market.

Appendix reference: N/A

3. 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.

No risk of trade diversion to the UK would materialise in case the existing safeguard measures were removed.



SECTION F: 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 21 November 2020. The checklist in Section G 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.

Internal registration number: TF0006

Company name: ACCIAIERIE VALBRUNA S.P.A.

Date : 21 November 2020

ACCIAIERIE VALBRUNA S.p.A.
L'Amministratore Delegato

Company stamp

Name and title of authorised
signatory



SECTION G: 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	X
Section B – Goods	X
Section C – Sales and profits	X
Section D – Information on each of the goods	X
Section E – Other questions	X
Section F – Next steps and declaration	X

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

Appendix reference	Document title
Appendix – 1	Manufacturing flow chart [Limited]
Appendix – 2	Valbruna Group Network Brochure
Appendix – 3	Excerpt from the Company Register [Limited]
Appendix – 4	Financial statements of Acciaierie Valbruna SpA [Limited]
Appendix – 5	Financial statements of Valbruna UK Ltd. [Limited]
Appendix – 6	Trial balances of Acciaierie Valbruna SpA [Limited]
Appendix – 7	Consolidated financial statements [Limited]
Appendix – 8	Print screen from Outokumpu website
Appendix – 9	Products manufactured by Acciaierie Valbruna SpA