



Register as an exporter to the case

Safeguard measures on certain steel products

Case: TF0006

Period of Investigation (POI):	1 January 2013 – 31 December 2017
Most Recent Period (MRP):	1 January 2018 – 30 June 2020
Deadline for response:	15 October 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) by 15 October 2020.

For further information regarding the POI or MRP, please see the Notice of initiation on the [public file](#).



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Section A – Your company's interest in the case

To register your company's interest in this case, please complete the text boxes below. You should use this form if you are an exporter of the goods subject to review. For a definition of goods subject to review, please refer to the Notice of Initiation.

1. Please describe the role of your company in relation to the goods subject to review, like goods or directly competitive goods:

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

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

2. Please describe your interest in this case:

Acciaierie Valbruna SPA wishes to participate in the present investigation as an interested party. Being a steel manufacturer exporting to the UK, Acciaierie Valbruna SpA aims at maintaining free access to the UK market and the possibility to keep supplying its valuable and loyal UK customers.



Section B – Additional information

Use the box below to provide any other relevant information which you think would be useful to help our review.

This may include:

- other parties which you think should be invited to register an interest in the case;
- scope of the review, including product categories and/or custom codes you think should be added or removed, and reasons why; or
- anything else you consider relevant.

Acciaierie Valbruna SpA submits that the UK production of goods falling in product categories 14 and 15 is insufficient to meet the demand. Moreover, with respect to product category 14 it should be noted that (i) the UK production only covers a limited product range and (ii) there is no UK production of stainless steel light sections classifiable under heading 7222.40. 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. Acciaierie Valbruna SpA therefore respectfully request the termination of the measures with respect to product categories 14 and 15.

As a subordinate ground, should the safeguard measures on product categories 14 and 15 be maintained, *quod non*, Acciaierie Valbruna SpA submits that the applicable tariff-free quotas should be re-determined as to reflect the most recent import volumes. As a matter of fact, during the MRP the volume of imports of EU products increased compared to the POI, while the volume of imports of non-EU products decreased. This should be taken into due account by the UK authorities when establishing the tariff-free quotas. In other words, the quotas should be rebalanced by increasing the quota for the EU and decreasing the quota for non-EU countries. In this regard, it should also be noted that the exemption granted to some (allegedly) developing countries such as Brazil, China, India and Ukraine with respect to product categories 14 and/or 15 appears to be absolutely unjustified in light of the production levels and production capacity of their respective industries.

Acciaierie Valbruna SpA reserves the right to submit additional claims and comments at a later stage of the investigation.