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Ms Imogen Yapp
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Submission by TRS Portal

OPEN FOR INSPECTION

Concerns: TF0006 – Transition safeguarding review: Safeguard measures on certain steel products | Submission of comments on Statement of Intended Preliminary Decision (“*the Statement*”)

Our client: Valbruna UK Limited (“*Valbruna UK*”) and its parent company Acciaierie Valbruna S.p.a. (“*Valbruna Italy*”)

Dear Madams,
Dear Sirs,

We refer to Trade Remedies Investigations Directorate’s (“*TRID*”) notification of 19 May 2021 transmitting the Statement on the basis of which TRID intends to apply safeguard measures to a limited number of product categories as of 1 July 2021, i.e., the date the European Union (“EU”) safeguard transition measures will cease to apply.

In its Statement, TRID informed interested parties that it will revoke by 1 July 2021 the safeguard measures which are currently applicable on imports of certain product categories, including but not limited to *stainless bars and light sections* classified under Product Category 14 (“*Category 14*”), due to i) the lack of production in the United

Kingdom ("UK"), ii) the lack of increase in imports in the period concerned or iii) the failure to pass TRID's economic interest test.

Our client welcomes the proposal of TRID to revoke the safeguard measures currently imposed on Category 14 on the ground that no increase of imports of the goods under this category took place in the UK. Our client would like to underline that such a decision would be right and appropriate for the following reasons:

- TRID was able to determine on the basis of verified data that between 2014 to 2017, imports of Category 14 into the UK demonstrated a significant and continuous decrease of up to 25%;
- the verified data concerning imports as a percentage of UK production to assess whether a "*relative increase*" in imports took place simply mirrored the decrease in imports of Category 14 in absolute terms, by dropping by almost 30% between the years 2014 and 2017; and
- in any event, the absence of production in the UK of the majority of the CN codes identified under Category 14¹ would have required this product category to be exempted from the scope of the proposed measures.

In light of the above, we respectfully request TRID to proceed with its proposal and revoke the safeguard measures on imports of *stainless bars and light sections* (Category 14) in accordance with regulation 50(3) of The Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019.

Yours sincerely,

Gabriele Coppo

¹ See Valbruna UK's submission of 13 November 2021