



Trade Remedies
Authority

Anti-Dumping Questionnaire: UK Producer Case ER0082: Expiry Review of wire rod products exported from the People's Republic of China

Period of Investigation (POI):	<input type="text" value="1 October 2024 to 30 September 2025"/>
Injury period:	<input type="text" value="1 October 2021 to 30 September 2025"/>
Deadline for response:	<input type="text" value="13 March 2026"/>
Contact details:	<input type="text" value="ER0082@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="British Steel"/>

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

Your completed response must comprise this questionnaire and the corresponding annexes. Please note that you will have to provide **Confidential** and **Non-Confidential** versions of the questionnaire and annexes, as well as of any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **13 March 2026**.

Table of Contents

Introduction	1
About us, this case and this questionnaire.....	1
Instructions on completing this questionnaire	2
Preparing confidential and non-confidential versions	3
Providing information from subsidiaries or associated parties.....	4
What happens next.....	4
Verifying the information you supply	4
The scope of this review	6
Goods subject to review	6
Like goods.....	6
SECTION A: Company structure and operations	7
A1 Identity and contact details	7
A2 About your company	8
A3 Organisational structure	9
A4 Operational links with other companies or persons	10
A5 Accounting practices	11
SECTION B: About your goods	14
SECTION C: Costs and Production	16
C1 Cost to make and sell	16
C2 Cost reconciliation.....	17
C3 Purchases of like goods and/or goods subject to review	18
SECTION D: Sales	19
D1 Domestic sales.....	19
D2 Sales reconciliation	19
D3 Distribution channels and price setting.....	19
SECTION E: Injury to your company	21
E1 Material injury.....	21
E2 Likelihood of Injury	23
SECTION F: Dumping	26
SECTION G: Particular Market Situation (PMS)	28
SECTION H: Understanding the UK market and impacts of the measure being extended	29
H1 Changes in the last five years	29
H2 Understanding the market.....	29
H3 Changes affecting your business / the market.....	33
H4 Impacts on groups with protected characteristics	36
Checklist	37
Glossary	38

Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry.

This expiry review is in reference to the [Trade Remedies Authority's notice 2022/07: anti-dumping duty on wire rod products originating in the People's Republic of China](#) and will consider whether dumping of wire rod products exported from the People's Republic of China and injury to the UK industry is continuing or likely to recur if the goods were no longer subject to the current anti-dumping amount.

Why should I take part?

We are asking domestic producers to complete this questionnaire to help us understand the industry and market for this product and assess whether the current measure is still needed. This will inform whether the anti-dumping measure should be extended.

The information your company provides will help us to reach a fair and proportionate decision. To note, we use the term "company" to include all forms of business organisation including partnerships and sole traders.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the instructions section below and on the Guidance tab of the annexes.

Please provide all the information requested by **13 March 2026**. 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. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow. If you have any questions relating to our processes, please contact our Trade Remedies Advisory Service on contact@traderemedies.gov.uk.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the case team at ER0082@traderemedies.gov.uk.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you will not be able 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 you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Further guidance and a **glossary of terms** can be found at the end of this document and on the guidance tab of the annexes, along with examples of how to present data for confidential and non-confidential responses, formatting of figures, and overviews of what each section relates to.

Your company will need to substantiate all claims with relevant data and information. You will be asked to attach supporting documents in appendices to supplement your responses: retain all these documents, your completed spreadsheet annexes, and any calculations you made when developing your responses for use during the verification of your response.

Please also note the following points:

- Please provide all formulas and calculations used within your questionnaire response. Space has been provided in the Guidance page of the annexes for you to do so.

- 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.
- 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.

Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is “zero”, “no” or “none”, please write this.

Preparing confidential and non-confidential versions

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes by the due date. We will publish the non-confidential version on the public file. Examples of confidential and non-confidential responses are in the guidance tab of the annexes. **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. Please see our [guidance on how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and will not be disclosed (except in limited circumstance as permitted by [Regulation 46 of the Trade Remedies \(Dumping and Subsidisation\) \(EU Exit\) 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

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 involved in the import, production, sale, Research & Development (R&D), distribution and/or supply of the like good and/or goods subject to review.

Please note, both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [Regulation 128 of The Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

- If any of your subsidiaries or associated companies are also a UK producer of like goods, they should also complete a Producer questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like 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

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload confidential and non-confidential versions through our [Trade Remedies Service](#). Following this:

- you will receive an email confirming the documents have been uploaded successfully
- the case team will contact you if further information is required
- the non-confidential responses will be placed on the public file; and
- the case team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, the case team will contact you to arrange this.

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.

Please keep a record of formulas and steps used in your calculations and other related material/documentation as it may be asked for during verification.

In some circumstances, verification may be conducted remotely.

We intend to conduct verification in the following period: **15 March 2026 to 1 May 2026.**

Please indicate any dates when you would be unable to host a verification visit.

Monday 13th April – Friday 17th April.
--

Appendix reference:

Once verification is complete, the TRA will prepare a report and share a draft with you. The TRA will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.

The scope of this review

Goods subject to review

This review covers wire rod products exported from the People's Republic of China, described as:

Bars and rods, hot-rolled, in irregularly wound coils, of iron, non-alloy steel or alloy steel other than of stainless steel originating from the People's Republic of China.

These wire rod products are currently classifiable within the following CN codes:

- | | | |
|--------------|--------------|--------------|
| • 7213 10 00 | • 7213 91 49 | • 7227 10 00 |
| • 7213 20 00 | • 7213 91 70 | • 7227 20 00 |
| • 7213 91 10 | • 7213 91 90 | • 7227 90 10 |
| • 7213 91 20 | • 7213 99 10 | • 7227 90 50 |
| • 7213 91 41 | • 7213 99 90 | • 7227 90 95 |

These codes are only given for information and are subject to change.

In this questionnaire, these goods will be referred to as '**the goods subject to review**'. Any reference to 'goods subject to review' in this questionnaire refers to the goods description above.

Like goods

This questionnaire asks for information about your company's production and sales of goods which are **like** the goods subject to review. Any reference to '**like goods**' in this questionnaire refers to goods produced in the UK or imported to the UK from a country other than the People's Republic of China which are like the goods subject to review in all respects, or with characteristics closely resembling them.

Please follow the instructions for each question to provide the appropriate information regarding the like goods or goods subject to review.

SECTION A: Company structure and operations

In this section, we ask you about your company structure and operations, as we aim to understand how your company and any associated companies operate.

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:

Company information	
Legal name of company:	British Steel Limited
Legal structure (e.g., limited company, sole trader, partnership etc):	Limited company
Year of establishment:	2019 (started trading in 2020)
Other operating names:	None
Company registration number:	12303256
Place of registration:	England and Wales
Address of main site:	British Steel, Brigg Road, Scunthorpe, North Lincolnshire, England
Postcode:	DN16 1XA
Contact details	
Name (point of contact):	[Redacted] personal information available in confidential version
Job title:	[Redacted] personal information available in confidential version
Business address:	British Steel, Administration Building, Brigg Road, Scunthorpe, North Lincolnshire, England, DN16 1XA
Telephone No:	[Redacted] personal information available in confidential version
Email:	[Redacted] personal information available in confidential version
Website:	https://britishsteel.co.uk

2. If you have appointed an external party to act on your behalf in this review, please provide their details and attach a letter confirming the TRA should contact them directly:

Name:	N/A
Address:	N/A
Telephone No.:	N/A
Email:	N/A
Confirm they have signed authority to act (Yes/No):	N/A
Appendix reference:	

A2 About your company

1. Is your company:

- A producer of the like goods in the UK
- An importer of the goods subject to review from (country)
- An importer of like goods from other countries (excluding country)
- A mixture of the above, please specify)

If your company both produces and imports the goods, provide approximate proportions of the goods you have sold in the UK market that you have domestically produced and those that you imported during the Period of Investigation (POI).

British Steel is a basic oxygen steelmaking manufacturer. Steel products produced include rail, wire rod, structural sections, special profiles and semi-finished products. In addition to manufacturing sites based in the UK, FNsteel was also manufacturing as-rolled, drawn and processed wire rod and wire products (during the POI). FNsteel has since been acquired (late 2025 / early 2026).

Appendix reference:

2. We need to check the legal establishment of your company. Supply the latest copies of the following documents:

- a) Articles of association (held by Companies House).
- b) Certificate of incorporation (issued by Companies House).
- c) Any relevant Business License(s) issued by the competent authority for your industry.

Clearly specify what you are submitting and provide appendix references for your attachments in the box below.

As per the confidential appendices.

Appendix reference:

3. Provide details of any changes in the legal form (for example, changing from a private company to a public company, from a limited company to a Limited Liability Partnership (LLP)) and/or structural changes (for example, mergers, acquisitions, change in ownership and/or sales) of your business during the injury period.

Date	Type of change	Explanation of change
12/04/2025	The Steel Industry (Special Measures) Act 2025	<p>The Act received Royal Assent and came into force on Saturday 12 April 2025. It was passed by Parliament to prevent the closure of British Steel's blast furnaces in Scunthorpe by giving the Government powers to intervene and maintain production.</p> <p>As of April 2025, the UK government has taken operational control of British Steel's Scunthorpe works through emergency legislation to prevent its closure, although Jingye Group remains the official owner.</p>

4. List and explain any authorisations your company has been required to obtain to produce goods subject to review or sell the like goods. Examples 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.

For details of British Steel's approvals and certifications, please visit:

<https://britishsteel.co.uk/who-we-are/approvals-certifications>

Appendix reference:

A3 Organisational structure

Answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) and legal persons (e.g. companies) are associated where they meet the definition of 'related persons' in [Regulation 128 of The Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

1. Please complete the **Related parties** tab in the **Annex** for your:
 - Company's worldwide corporate structure and affiliations.
 - All companies in the group associated with the like goods.
 - Types of control in non-group entities (e.g. Directorship, Shareholding)

2. If your company is part of a group (e.g. parent company with subsidiaries, joint-ventures, common ownership):
 - a) Provide a diagram showing the complete ownership structure. *[Note: the diagram of corporate structure should be for the company's ultimate parent company].*
 - b) List all related companies involved in the production or sale of the like goods and a description of the functions performed by each company within the organisation; and
 - c) Specify which company within the group owns the production facility(ies)
 - d) Specify which company within the group carries out the sales of the goods

Company structure provided. Available for confidential use only.
--

Appendix reference:

3. Provide the following:
 - a) List all production and department's locations and addresses (including town/city and county) involved in the production of the like goods for domestic and export markets.
 - b) Locations where the like goods are supplied, distributed or sold for both domestic and export markets.
 - c) State if any of the production locations closed during the injury period. If your company permanently or temporarily closed or disposed of any facilities or assets affecting your production of the like goods during the POI, indicate the date, location and reasons for such an action and whether it resulted in any job losses.

British Steel Rod Mill and British Steel Head Office in Scunthorpe: Brigg Road, Scunthorpe, North Lincolnshire, DN16 1XA, United Kingdom.
--

Appendix reference:

A4 Operational links with other companies or persons

1. Complete the table below if your company has established long-term agreements over the injury period or relationships with any company/companies located in the UK, the People's Republic of China, or in third countries for the production (e.g. sub-contracting), supply and sale of the like goods, or other licensing, technical

patent or compensatory agreements.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix Number of contract
FNsteel BV, Rapenburg 1, 2952 AP, Alblasserdam, Netherlands	Sister company Sister company during POI, but has since been acquired (late 2025 / early 2026)	KvK 23093135	FNsteel BV was a sister company of British Steel Limited during the POI

2. If your company has long-term agreements with other companies/persons for the supply of goods destined for internal sale, can you:
- Provide copies of the contracts as evidence of these agreements.
 - Explain how the prices of the internal sales have been determined.

For response to this question, please refer to the confidential submission.

Appendix reference:

A5 Accounting practices

1. What accounting standards have been adopted by your company (e.g. IFRS)? Do your accounting practices differ in any way from UK generally accepted accounting principles (UK GAAP)? If yes, provide details.

All financial data strictly confidential and available only for the purposes of this case.

Appendix reference:

2. If any changes have occurred with respect to your accounting practices and/or policies during the injury period, please explain the changes. The explanation should include dates and the reasons for those changes along with the financial impact of those changes on your like goods.

All financial data strictly confidential and available only for the purposes of this case.

Appendix reference:

3. State your financial accounting period (e.g. 1 January to 31 December)?

All financial data strictly confidential and available only for the purposes of this case.

Appendix reference:

4. Has your accounting period changed during the injury period?
If yes, describe these changes.

All financial data strictly confidential and available only for the purposes of this case.

Appendix reference:

5. For your company and any associated parties involved in the production, marketing or sales of your like goods, attach copies of your financial statements and audit reports covering the injury period.

If your financial statements are unaudited, explain why this is the case.

All financial data strictly confidential and available only for the purposes of this case.

Appendix reference:

6. If your company is part of a group of companies, attach a copy of the consolidated accounts of the group for the most recently completed financial year.

Copies of accounts available via the confidential documentation.

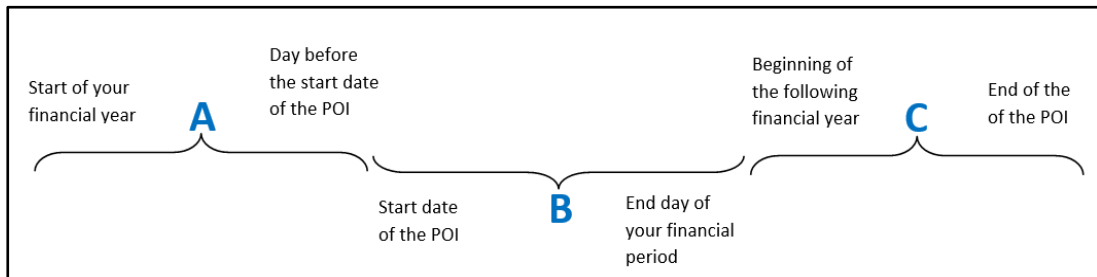
Appendix reference:

7. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI. If your financial year is fully aligned with the POI, this is all that is required.

Where your financial period is not aligned with the POI, please provide trial balances (in original and spreadsheet form) to cover the following periods:

- . The trial balance which starts from the beginning of your financial year and ends on 30 September 2024;
- . The trial balance which starts from 1 October 2024 to the end of your financial year; and

- . The trial balance which starts from the beginning of your following financial year and ends on 30 September 2025.



All financial data strictly confidential and available only for the purposes of this case. Trial balance document provided within the confidential documentation – not for public file.

Appendix reference:

Note:

For your company and any associated parties involved in the production, marketing or sales of the like goods, you will need to provide the sources and workings (explaining how the sources were used) to produce the annex information for the like goods for the POI.

This information helps us reconcile your data.

Please retain all workings and Excel formulas to facilitate verification of your data.

SECTION B: About your goods

We ask you about your products to identify whether your goods constitute UK like goods and to gain a better understanding of how the goods you produce relate to the goods subject to review.

1. Please complete the **Company's like goods** tab in the **Annex**.

This tab collects information on:

- Your like goods and the internal coding system,
- Essential characteristics of the product (i.e. physical, commercial)
- Commodity code.

2. Describe how your company's internal coding system has identified the like goods. Please provide demonstrable example(s) (e.g. screenshots).

How the like goods are identified is explained in the confidential documentation – not for the public domain.

Appendix reference:

3. List all production standards, international and/or domestic, (e.g. ISO, GMP, IATF) your company currently conforms to, for the like goods.

All relevant production standards are captured in the confidential submission.

Appendix reference:

4. If there are differences in physical and commercial characteristics within your range of like goods which cause distinguishable differences in price, explain those differences and the effect they have on price.

Supply any relevant evidence (e.g. sales brochures, input costs, or other promotional material).

British Steel manufactures a range of wire rod products at its rod mill in the UK. Tariff classification, pricing and other relevant characteristics relevant to this case are available via the confidential documentation.

Technical datasheets are available via the British Steel website for key products: <https://www.britishsteel.co.uk/wp-content/uploads/2026/03/British-Steel-product-brochure-03.03.26-4.pdf>

Appendix reference:

5. Describe all the other products (not including the goods subject to review / like goods) produced or sold by your company in the UK.

As well as wire rod, British Steel also produces rail, structural sections, special profiles and semi-finished products. A comprehensive list and description of each product range, including relevant technical datasheets, can be found in British Steel's product brochure:

https://www.britishsteel.co.uk/wp-content/uploads/2026/03/British-Steel-product-brochure-03.03.26-4.pdf

Appendix reference:

SECTION C: Costs and Production

C1 Cost to make and sell

This section is about costs to make and sell your like goods. We use this information to understand the costs to produce and sell the goods on the UK market, and where appropriate to carry out injury margin calculations and economic analysis.

1. Please complete the **Costs to make** and the **AS&G** (Administrative, Sales & General expenses) tabs in the **Annex** for the POI for:
 - All goods produced by you
 - All like goods produced by you
 - All like goods produced by you and sold in the UK

If you are not able to provide exact cost to make figures for domestically produced and domestically sold like goods, provide reasonable approximate figures and explain your method below. If you cannot provide reasonable approximate figures, explain why below. Please provide all workings and retain Excel formulas to facilitate verification of your data.

All cost to make and sell data is strictly confidential.

Appendix reference:

2. If your company has a costing structure that transfers accumulated product costs from one process to another, provide details (e.g. at cost, internal transfer pricing, etc.).

All cost to make and sell data is strictly confidential.

Appendix reference:

C2 Cost reconciliation

1. Please complete the **Cost Reconciliation** tab in the **Annex**.
Provide all documents that were used as a data source to complete the tab.

Attach relevant documentation (for example, a screenshot from your accounting system, a general ledger file, financial statements, etc.) If the documents include spreadsheets, all formulas used must be retained.

Provided in the appendices of the confidential documentation.

Appendix reference:

2. Describe and include diagrams/flow-charts where available, the main stages of the production process (e.g. raw material sourcing, manufacturing, assembly, packaging, distribution, etc.) for your like goods from initial inputs to final output.

Clearly indicate:

- i) Stages taking place in the UK;
- ii) Stages taking place outside the UK, and location;
- iii) Any stages that are outsourced to external companies.

Please refer to diagram and narrative in Appendix B4.1 of the confidential submission.

Appendix reference:

3. Explain at what stage in the production process is the most value added to your like goods.

If you are aware that the production process of the like goods is materially different from the process used in the People's Republic of China, explain the differences.

All parts of the production process from iron production, steelmaking, and the manufacture of wire rod in coil, take place in the UK. For further details of the manufacturing process, please refer to the schematic in Appendix B4.1 of the confidential submission. Capital investment information is strictly confidential.

Appendix reference:

C3 Purchases of like goods and/or goods subject to review

1. Please complete the **Purchases of like goods** tab in the **Annex**. This tab collects information relating to your company's total annual purchases over the injury period of:
 - Like goods purchased from other UK producers,
 - Like goods purchased from third countries,
 - Goods subject to review.

All figures should be reported net of recoverable tax. For each year list every country you have purchased from in a separate row.

N/A.

Appendix reference:

2. How often (e.g. monthly, quarterly, yearly, one off purchase etc) do you purchase:

- Like goods purchased from other UK producers;
- Like goods purchased from third countries;
- Goods subject to review.

N/A.

Appendix reference:

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

Attach copies of any agreements or contracts that you have relating to your purchases of like goods and/or goods subject to review.

N/A.

Appendix reference:

SECTION D: Sales

D1 Domestic sales

1. Please provide Transaction by Transaction (T by T) data by completing the **T by T domestic sales** tab in the **Annex**.

The data provided should reflect only domestic sales of like goods and/or goods subject to review.

Contact the case team (ER0082@traderemedies.gov.uk) if you cannot provide information in sufficient detail.

D2 Sales reconciliation

In this section, we ask you about your total sales during the POI. This includes sales of the like goods in the UK and your export markets, as well as sales of any other goods you might produce.

1. Please complete the **Sales reconciliation** tab in the **Annex**.

Provide all documents that were used as a data source to complete the tab.

Attach any relevant documentation (for example, a screenshot from your accounting system, a general ledger file, financial statements, etc.) If the documents include spreadsheets, all formulas used must be retained.

Provided in the appendices of the confidential documentation.

Appendix reference:

D3 Distribution channels and price setting

1. How is the price of the like goods determined?

Provide supporting evidence (examples; price lists, individual customer or per-job price negotiations, prices directly following market prices etc.) for your sales of the like goods during the POI.

British Steel Wire Rod does not publish price lists. All matters relating to pricing and customer level agreements are confidential and not for the public domain. For the purposes of this case, please refer to the confidential documentation.

Appendix reference:

2. If price reductions have been applied to any of your domestic sales of your UK like goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.
- Explain the terms and conditions that must be met for any price reduction.
 - Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.
 - If you have issued any credit notes that are not reflected in invoice prices, provide details of the criteria for issuing such notes and the impact that they have on prices (both past and future).

All matters relating to pricing and customer level agreements are confidential and not for the public domain. For the purposes of this case, please refer to the confidential documentation.

Appendix reference:

3. Do your sales usually include delivery in the price?

If yes, explain how you calculate delivery costs and prices?

All matters relating to pricing are confidential and not for the public domain. For the purposes of this case please refer to the confidential documentation.

Appendix reference:

4. Select examples of domestic sales of like goods to two different customers included in **T by T domestic sales** tab in the **Annex**.

Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

Documents included in the appendices of the confidential submission for two domestic customers.

Appendix reference:

SECTION E: Injury to your company

In this section, we assess the impact of the dumped goods on UK industry during the injury period, by considering economic factors including but not limited to: sales, profits, output, market share, productivity, return on investments, utilisation of capacity, cash flow, stock (finished goods inventories), employment, wages, growth, ability to raise capital and investments.

E1 Material injury

1. Please complete the **Injury** tab in the **Annex**

Provide all documents that were used as a data source to complete the tab. Attach any relevant documentation (e.g. a screenshot from your accounting system, a general ledger file, financial statements, etc.) If the documents include spreadsheets, all formulas used must be retained.

Include explanations within the **Injury** tab in the **Annex**, explaining how each economic factor was calculated; for any factors that require further explanation/have a more detailed level of complexity. Use the box below, and/or attach further explanations to this submission.

Relevant appendices captured in the confidential submission.

Appendix reference:

2. Can you describe - with reference to the injury factors - how you think the current measures are having an impact on your business?

Currently, due to the customs duty on imports, protecting against anti-dumping, British Steel is not suffering from injury associated with dumping.

Appendix reference:

3. Would your company suffer from injury if the existing anti-dumping measure on the goods subject to review expired?

If yes, describe the type and extent of the injury considering the economic injury factors identified at the start of **Section E**.

Provide supporting evidence where available.

It is likely that should the customs duty on imports be removed, the UK may become more attractive to importers and British Steel may suffer injury as a result. For further details, please refer to the comments made in the confidential submission.

Appendix reference:

4. Explain the key factors that have affected the profit levels during the injury period (for the like goods)

Profit is confidential. For response to this question, please refer to the confidential document.

Appendix reference:

5. For your like goods only, state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury. Would your level of profit, before tax, as a percentage of turnover for the like goods be affected if the existing anti-dumping measure on the goods subject to review expired? Describe the nature of any change and substantiate your claims with evidence.

Profit and turnover of like goods is confidential. For response to this question, please refer to the confidential document.

Appendix reference:

6. What factors impact price setting of your current sales price for the like goods?

Sales prices / targets are confidential. For response to this question, please refer to the confidential document.

Appendix reference:

7. Would there be any other effects on your industry and/or company if the existing anti-dumping measure on the goods subject to review was to expire?

Substantiate your claims with evidence.

It is likely that should the existing anti-dumping measure be removed, the UK may become more attractive to importers and British Steel may suffer injury as a result. For further details please refer to the comments made in the confidential submission.

Appendix reference:

8. Is your company currently suffering injury which is not due to the goods subject to review?

If yes, list any factors that have caused injury to your business and explain their impact. Examples of other factors include:

- Volume and prices of imports not sold at dumped prices;
- Contraction in demand or changes in patterns of consumption;

- Restrictive trade practices of, and competition between, third country and UK producers;
- Developments in technology;
- Export performance and the productivity of the UK.

Substantiate your claim(s) with evidence.

Currently, due to the customs duty on imports, protecting against antidumping, British Steel is not suffering from injury.
--

Appendix reference:

E2 Likelihood of Injury

- a) Do you have any information (for individual companies and/or the industry) about the:
- . production volumes
 - . production capacity
 - . utilisation of capacity

among People's Republic of China producers and exporters of the goods subject to review during the POI?

If yes, provide estimates and substantiate with evidence where possible.

N/A.

Appendix reference:

- b) Do you know how capacity and capacity utilisation among exporters of the goods subject to review have changed during the POI, or might change in the next five years? Provide evidence if available.

N/A.

Appendix reference:

- c) Do you have any information on the stock volumes of the goods subject to review/like goods in the domestic market of the People's Republic of China?

If yes, provide estimates and substantiate with evidence where possible.

N/A.

Appendix reference:

- d) Are there any other goods that can be produced using the same manufacturing equipment/processes, that are not the like goods/goods subject to review? How feasible would it be to shift production to the like goods/goods subject to review?

N/A.
Appendix reference:

- e) In respect of UK consumer preference, are there any differences between the goods you produce (like goods), and the goods subject to review? What impact do these differences have?

N/A.
Appendix reference:

- f) Are there any differences between your UK manufactured like goods and the goods subject to review?

Explain in terms of: quality, specifications/standards, price, and anything else you consider relevant. Provide supporting evidence where possible.

N/A.
Appendix reference:

- g) How easy/difficult is it for an overseas producer from the People's Republic of China to produce goods that meet the UK requirements/standards for the like goods?

Explain and provide supporting evidence where possible.

N/A.
Appendix reference:

h) Do you have any information on the trends and projections of demand for the relevant goods in:

- The UK
- The overseas exporters market
- Third countries domestic markets

Comments on market demand, competitive intensity and product differentiation are all referenced earlier in the confidential version of the questionnaire. Pricing is subject to a range of factors, as highlighted. Forecast growth will be driven by end-use sectors.

Appendix reference:

SECTION F: Dumping

1. Do you have any information about the domestic price of the goods subject to review in the People's Republic of China?

If yes, provide information and evidence where possible (e.g. sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, etc.)

N/A.

Appendix reference:

2. Do you have any information about the export price from of the goods subject to review / like goods from the People's Republic of China to:
- The UK?
 - Other countries?

Do you consider these to have been sold at dumped prices?

Provide evidence where possible (e.g. sales catalogues, price lists, invoices, quotes or sales correspondence etc).

N/A.

Appendix reference:

3. Are you aware of any incentives for overseas producers to export? If yes, provide details and any supporting evidence.

N/A.

Appendix reference:

4. Are you aware of any circumvention of trade remedies measures in relation to the goods subject to review?
If yes, provide details and any supporting evidence.

N/A.

Appendix reference:

5. Are you aware of any countries that have imposed trade remedies measures on the goods subject to review?

If yes, provide details and any supporting evidence that you may have.

What impact has this had on the country/ies that have imposed and have not imposed trade remedies measures on the goods subject to review (e.g., whether trade flows have reduced or been re-routed to other countries).

Provide supporting evidence where possible.

As of October 2025, 62 countries have implemented 207 restrictions against steel products from China ([GMK Center, 2026](#)):

The United States imposed extensive restrictions, including a 25% tariff on steel imports under Section 232 in 2018, which was increased to 50% in June 2025.

The European Union (EU) maintains tariff-rate quotas restricting imports of Chinese steel and has engaged in anti-dumping investigations.

Canada applies a 25% surtax on specific imported steel products from China, including wire rod.

Australia has investigated and imposed measures on Chinese hot-rolled steel products, including wire rod.

Appendix reference:

SECTION G: Particular Market Situation (PMS)

1. The applicant has alleged that there is a Particular Market Situation (PMS) in the market for the goods subject to review in the People's Republic of China. The TRA will therefore consider whether such a PMS exists as part of its review. You are invited to provide comments and information which would be relevant to the TRA's consideration of whether such a PMS exists. Details of the allegation are set out in the public file.

All comments and information, which would be relevant to the TRA's consideration of whether such a PMS exists, can be found in the confidential submission.

Appendix reference:

SECTION H: Understanding the UK market and impacts of the measure being extended

This section collects information to understand the competitive landscape and how the market works for wire rod products. It is also used to assess the economic impact of the existing measure being extended.

H1 Changes in the last five years

1. Have there been any significant changes affecting your business / the market in the last five years? These changes may include:
 - Changes to market share,
 - Changes to consumer demand or preference,
 - Supply chain disruptions,
 - Increases or decreases in the number of market participants,
 - Regulatory changes,
 - Changes in taxation, or
 - Any other relevant factors (please specify).

Extremely high energy costs – a sharp rise in gas prices began in 2021 and was then accelerated by the Russian invasion of Ukraine in 2022. UK electricity prices are much higher than in other EU countries due to a high dependency on imported natural gas to generate electricity.

The world's commitment to lower emissions – the UK's Net Zero decarbonisation plan was introduced in 2021.

Trade barriers and Brexit have affected trade between the UK and Europe. The industry has also been impacted by US tariffs, which include a 25% tariff on steel imports.

Appendix reference:

H2 Understanding the market

1. Describe the end-use(s) of wire rod products. If there are multiple uses, list them, and estimate what proportion of sales goes toward each use type.

British Steel produces a range of wire products for market sectors including automotive, construction, engineering and consumer goods. Typical end-uses depend on the market and end-application, but can typically include the following:

Automotive – tyre reinforcement and fasteners (such as bolts, nuts and screws).

Construction – concrete reinforcement, mesh, fencing and structural components (such as nails, screws and rivets).

Consumer goods – household appliances, bedding and seating.

Appendix reference:

2. Give details of any goods which are complementary to wire rod products. (e.g. tennis rackets and tennis balls)?

British Steel manufacturers wire rod – not end products. Because it serves as a raw material to its markets, complementary products are typically downstream, manufactured goods which are produced by wire drawing, cold forming or welding. British Steel's wire rod for example, goes into the manufacture of car tyres, mattresses and nuts and bolts.

Appendix reference:

3. Based on your knowledge, approximately, how many:
- UK based companies produce wire rod products?
 - Foreign companies sell wire rod products in the UK?

Are these producers typically large, small, or a mix of both?

Details provided in the confidential submission.

Appendix reference:

4. Based on your knowledge, approximately how much of wire rod products are sold in the UK each year? [State your unit for quantity].

Details provided in the confidential submission.

Appendix reference:

5. How similar are wire rod products produced by different producers? Explain any significant differences (e.g. branding, packaging, quality, or other features).

Most wire rod manufactures will have standardised diameter ranges with similar tolerances. They will also adhere to universal standards. The quality and properties of the wire rod they produce will vary however, depending on the production technology (blast furnace / BOF steel making process or electric arc furnace) or the

use of modern casting and rolling methods. Further details have been provided in the confidential submission.

Appendix reference:

6. How easy is it for businesses to start production of wire rod products? Are there any barriers to starting production? For example:
- irrecoverable past investments;
 - technology, regulatory barriers;
 - inability to reach the minimum production scale to operate feasibly;
 - high upfront or long duration investment before starting production;
 - skills shortages;
 - prohibitive start costs associated with continuous production.

For a business to start producing wire rod products, it would require significant funding for machinery in the way of rolling mills, coiling machines and infrastructure. It may even require funding for land if this is not already available. The operational costs to run a mill would also be expensive as wire rod production is a very energy-intensive process, which involves heating to extreme temperatures and then rolling.

Wire rod products must meet stringent standards regarding tensile strength, diameter tolerance and surface finish. For a business to start producing wire rod products that meet these standards, it must ensure that it has the required facilities, expertise and testing in place.

Appendix reference:

7. How easy is it for businesses to stop production of wire rod products? Are there any barriers to stopping production? For example:
- labour related costs,
 - regulatory exit requirements,
 - irrecoverable past investments,
 - long-term contracts with buyers or suppliers and any penalty termination costs,
 - government interventions (e.g. subsidies),
 - bankruptcy regimes etc.

It is operationally possible to halt the production of wire rod temporarily or permanently, but doing so could be costly. There are fixed costs to consider and also workforce displacement or redundancies to factor in. If a business has a blast furnace / BOF steel making process, it would also have to consider where it will redirect its steel to in the short-term.

Appendix reference:

8. If the price of all of wire rod products in the UK were to increase, would consumers significantly reduce their demand? and why?

Details of this are provided in the confidential submission.

Appendix reference:

9. Do consumers buy wire rod products from the cheapest producer, or are there other factors that influence their decision such as quality and service?

Product quality is more consistent across mills for commoditised grades, where price is a key determining factor. Certain grades however, are not interchangeable and may differ on quality due to their specialised manufacturing processes. Variations also exist in surface treatments and cooling processes, which impact the mechanical properties of the product and its surface quality.

Appendix reference:

10. How easy is it for producers to increase or decrease production in response to changing market conditions such as increased demand?

It's a difficult task to adjust production levels, especially for producers with a blast furnace / BOF steel making process, as they are designed for continuous operations. There is also a need to consider raw material availability and the high fixed costs associated with steel production.

Appendix reference:

11. Describe any major changes in demand or preferences for wire rod products and their causes over the injury period. For example:

- Prices of goods;
- Price of substitutes and complementary goods;
- Consumer preferences and tastes;
- Technological developments;
- Taxes and subsidies

Details provided in the confidential submission.

Appendix reference:

12. Do you foresee any major changes in demand or preferences for wire rod products in the next five years?

We are unable to quantify/forecast for the next five years due to the range of factors impacting demand and the nature of the competitive landscape.

Appendix reference:

13. What are the major distribution and marketing channels within the UK market for wire rod products?

The major distribution channels within the UK market include manufacturers, stockholders and industrial distributors. The key marketing channels include direct selling, using technical sales agents and catalogue / online distributors.

Appendix reference:

14. Which types of businesses/consumers use wire rod products within the UK market and for what purpose?

Automotive – producers of tyre components, springs and fasteners (automotive components)

Construction – structural engineers, contractors, builders and manufacturers (to create reinforcing materials, fasteners and mesh etc.)

Consumer goods – manufactures of furniture, appliances and fixtures / fittings

Appendix reference:

15. Do wire rod products from the People's Republic of China compete directly with the wire rod products you produce, or are there any factors which may mean UK consumers do not opt for the cheapest priced wire rod products? Please provide detail here.

Most wire rod manufactures will have standardised diameter ranges with similar tolerances. They will also adhere to universal standards. Product quality is more consistent across mills for commoditised grades, where price is a key determining factor. Certain grades however, are not interchangeable and may differ on quality due to their specialised manufacturing processes. In this case, where specific mechanical properties / surface quality is required, consumers will be more selective.

Appendix reference:

16. Are there any government regulations or tax incentives which significantly affect the production or sales of wire rod products? If yes, give details.

Details provided in the confidential submission.

Appendix reference:

17. Describe any developments in technology affecting the characteristics, demand or the production process of wire rod products.

Details provided in the confidential submission.

Appendix reference:

18. Describe any other factors which influence the market for wire rod products which you have not already mentioned (e.g. seasonality).

N/A – factors already covered.

Appendix reference:

H3 Changes affecting your business / the market

- Please complete the **UK domestic companies** tab in the **Annex**. This tab collects any information you may have about companies:
 - that produce wire rod products in the UK;
 - involved in the importation, distribution, or sale of wire rod products from third countries;
 - that produce or sell raw materials used in the production of wire rod products in the UK;
 - that purchase wire rod products, including those that use wire rod products in their products or services; and/or those that sell on wire rod products either to other businesses or to final consumers.
- Please complete the **Employment by site** tab in the **Annex**, providing employment figures in full-time equivalents (FTE) for each of your company's UK sites or facilities.

Employment related data is strictly confidential and available only for the confidential review.

Appendix reference:

- Explain how your total employees involved in the UK manufacture of like goods are split across different sites/locations.

Employment related data is strictly confidential and available only for the confidential review.

Appendix reference:

4. How important is the production of wire rod products to your company?

Details provided in the confidential submission.

Appendix reference:

5. How would you expect an increase in the prices of the imported wire rod products to affect:

- a) Domestic prices of wire rod products; and
- b) UK production of wire rod products.

Details provided in the confidential submission.

Appendix reference:

6. How would your company be affected if the existing anti-dumping measure was to expire including:

- a) by site (this is only relevant if you company operates across more than one site);
- b) on domestic sales of wire rod products;
- c) on your plans for investment/expansion.

Details provided in the confidential submission.

Appendix reference:

7. Would there be any indirect effects (e.g. price increases, consumers switching to substitute products, input costs, reduced innovation,) on your industry and/or business if the existing anti-dumping measure was to expire? Comment on the effect if the measure was to expire.

If the existing anti-dumping measure were to expire, there would definitely be indirect effects on the business and the industry. The details of this are provided in the confidential submission.

Appendix reference:

8. Do you know of any related industries that would be affected if existing anti-dumping measure was to expire?

Yes, related supply chain industries and consumers would be impacted should the measures be removed.

Upstream – local supply chains providing raw materials and services to British Steel would be significantly impacted by any reduction or further deterioration to the business footprint.

Downstream – key UK consumers of wire rod products may be impacted if the measures were removed and if British Steel suffered injury.

Appendix reference:

9. To what extent would you expect any changes in prices of wire rod products to be passed onto final consumers?

Price levels are determined based on several factors, such as demand and availability. If availability in the market is increased, prices would reduce. Price increases are subject to supply and demand balance, raw material price increases etc.

Appendix reference:

10. Are there any other factors that you think we should be aware of in investigating or considering the impacts if the existing anti-dumping measure was to expire.

Details provided in the confidential document.

Appendix reference:

H4 Impacts on groups with protected characteristics

1. As a public body, the TRA has an obligation under the Equality Act 2010 to ensure that the potential effects of measures on different groups or individuals with characteristics are considered. The [Public Sector Equality Duty \(PSED\)](#) covers the following protected characteristics:

- age,
- disability,
- gender reassignment,
- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation.

Please provide any relevant information about whether any of these groups or any other particular group might be disproportionately affected if the existing anti-dumping measure was to extend or expire.

N/A – no reason why the anti-dumping measures would impact or disproportionately affect any of these groups.

Appendix reference:

Glossary

Explanations of some of the terms used in this questionnaire and/or the annex(s) are given in the table below.

Term	Explanation
Accounting period	Time frame used for financial reporting. Transactions that fall within a given date range form part of the statements or reports for that accounting period.
Accounting policies	Specific principles, bases, conventions, rules and practices applied by an entity in preparing and presenting financial statements.
Accounting system	Set of accounting processes with integrated procedures and controls which a business uses to record its basic financial transactions. Many businesses use accounting software to carry out this process.
Administrative, selling and general costs (AS&G)	Expenses that keep a business running but are not directly tied to producing goods.
Amortization	Gradual reduction of any amount, such as the periodic writedown of a loan or the cost of an intangible asset.
Associated parties	Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in Regulation 128 of The Customs (Import Duty) (EU Exit) Regulations 2018 .
By products	Products which are produced incidentally in the process of manufacturing something else.
Complementary good	Goods that are usually used/ consumed together. e.g. tennis rackets and tennis balls.
Consolidated accounts	Set of financial statements that combine the financial information of a parent company and its subsidiaries into a single, unified report. This aggregated report details the assets, liabilities, income, and expenses of the group as one single economic entity.
Cost allocation	The assigning of a cost to several products or departments.
Cost centre	A physical area or a department or function in an organisation for which costs can be related to. They do not necessarily generate revenues but incur costs for example - Assembly area, HR etc. More about this is the next session.
Cost to make and sell	Sum of the cost of production or manufacture, and the selling, general and administration costs associated with the sale of those goods.
Direct labour cost	Variable cost (i.e. the value varies with the level of production) that is for specific work that can be traced to an end product.
Direct material	Materials that are directly used in the production process of goods and services of a company.

Dumping	Dumping is when goods are imported into a country and sold at a price that is below their 'normal value' in the country they are exported from.
Earnings Before Interest Depreciation Tax and Amortization (EBIDTA)	This is a company's earnings before deducting interest, depreciation, tax and amortisation.
Export price	Selling price of the goods subject to review. This could be from sales to a UK importer or a third party for export to the UK.
Extraordinary costs	Costs related to significant and unusual events or transactions that are both unusual and infrequent in nature (e.g. losses from early debt repayment, intangible assets write-offs, legal settlements, start-up)
First in first out (FIFO)	The costs associated with materials that were booked into inventory first will be the first to be used in the production process.
Flow chart	Type of diagram that represents a workflow or process.
General ledgers	A ledger containing the consolidated balances of all ledger accounts used by a business to keep track of its financial transactions and to prepare financial reports.
Generally accepted accounting principles (GAAP)	Accounting rules and standards published by a country's financial reporting authority.
Goods subject to review	Goods subject to review are the goods described in the notice of initiation of a review.
Indirect cost	Any cost that cannot be traced to a specific product and must be assigned using an allocation method.
Injury	Injury means material injury or the threat of material injury.
Injury, material	Material injury is where there is evidence of the UK industry being injured by the dumped goods or subsidised imports.
Injury period (IP)	The injury period covers the period of investigation plus the 36 months (three years) immediately before the period of investigation, totalling 48 months, unless the TRA considers that it is appropriate to use an alternative period in accordance with Regulation 30(4) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019
Intangible asset	Asset without physical substance that will provides future economic benefits.
Inventory	A broader term which includes finished goods stock: assets which are held for sale in the ordinary course of business, but also work in the process of production for such sale (work in progress), and materials or supplies to be consumed in the production or rendering of services.
Joint products	Two or more products that are generated within a single production process. These products would usually have undifferentiated cost.
Last in first out (LIFO)	A valuation method whereby the costs associated with materials that were booked into inventory last will be the first to be used in the production process.

Like goods	Goods that are like the goods subject to review in all respects, or with characteristics closely resembling them.
Management accounts	Management accounts are financial reports produced for the business owners and managers.
Normal value	Legal: Comparable price, in the ordinary course of trade, for like goods when destined for consumption in the exporting foreign country or territory. Prices considered must be on an arm's length basis.
Operating Expenses	Expenses are expenses incurred by a business through its normal business operations.
Overheads	Indirect production costs which are incurred in the course of making a product/service that cannot be traced to a specific product and must be assigned using an allocation method. (e.g. factory rent, factory insurance, factory depreciation and production salaries).
Particular Market Situation (PMS)	A situation that exists in the market of the exporting country which means that the prices in the country's market won't allow a proper comparison with prices elsewhere. For example, this could be the case if prices are lower due to substantial government intervention in the market, there is significant barter trade, or there are non-commercial pricing arrangements.
Period of Investigation (POI)	A period of at least one year ending as close as possible to the date of the initiation of the investigation or such other period as the TRA considers appropriate.
Product Control Numbers (PCN)	Identifiers created on the basis of the main characteristics differentiating the sub-categories of goods within the scope of the investigation.
Profit Before Tax (PBT)	Profit Before Tax (PBT), also called pre-tax profit or Earnings Before Tax (EBT), is a company's earnings after deducting all operating and non-operating expenses (like COGS, salaries, interest) but before subtracting income taxes.
Quarter	An associated three-month period of a year e.g. 1 January – 31 March, 1 April – 30 June, etc.
Related party	A related party is a person or an entity that is related to the reporting entity: A person or a close member of that person's family is related to a reporting entity if that person has control, joint control, or significant influence over the entity or is a member of its key management personnel. The legal definition is laid out in Regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018 .
Return on investment (ROI)	Performance measure that indicates how much profit or loss is generated for each unit of capital invested, essentially showing the return relative to the initial cost. ROI is expressed as a percentage.
Statement of financial position (SOFP)	Financial statement that summarises a company's assets, liabilities, and equity on a particular date – usually at the end of a financial month or financial year. This is commonly known as a Balance sheet.

Statement of profit or loss (SOPL)	Also called an income statement, this report shows your business's revenues and expenses. Expenses are subtracted from revenues to show your business's profit or loss figure, also known as net income. This is commonly known as an Income Statement or a Profit and Loss.
Stock	Refers to finished goods only.
Sub-ledgers	Accounting record that shows transactional level information that underpins totals and balances shown in a company's trial balance. For example, a sales receivable ledger would detail all of the individual transactions that make up the sales receivable balance.
Transfer pricing	Setting of prices between divisions of a group.
Trial balance	A trial balance is a list of ledger balances shown in debit and credit columns. It lists the balances on ledger accounts and totals them. Total debits should equal total credits.