



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):	1 October 2024 to 30 September 2025
Injury period:	1 October 2021 to 30 September 2025
Deadline for response:	31 March 2026
Contact details:	[REDACTED]
Completed on behalf of:	7 Steel UK

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**.

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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.

NA – Agreed hosting dates are 21.04.2026 to 23.04.2026

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 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

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.

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:	
Address:	
Telephone No.:	
Email:	
Confirm they have signed authority to act (Yes/No):	
	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).

A producer of the like goods in the UK. Manufacturer and seller to wire drawers and fabricators.

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.

Certificate of incorporation and certificate of name change

Appendix reference:A2.2 FIN 1 - 7 Steel – incorporation
FIN 2 - 7 Steel - change of name

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
19.05.2025	Name Change	Changed name from Celsa Steel (UK) Limited to 7 Steel (UK) Ltd
19.05.2025	Change of Relevant legal entity	Relevant legal entity changed from Celsa UK (Holdings) Limited to 7 Steel (UK) Holdings Limited
11.04.2025	Person with significant control	Person with significant control changed to SEV.EN Steel UK Ltd
11.04.2025	Person with significant control	Ceasing of Catalunya Steel S.L as person with significant control

+Add additional rows as required.

Appendix reference: FIN 2, FIN 3, FIN 4 and FIN 5

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.

It is custom and practice in the UK construction industry for third party certification of steel reinforcing products to be required. 7 Steel UK third party certification from:

CARES
BBA – British Board of Agrément

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

See the organisation chart attached	Appendix reference: A3.2 - FIN 6 - 7 Steel UK Entity Structure
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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.

7 Steel Manufacturing - Seawall Road, Tremorfa, Cardiff CF24 5TH
7 Steel Manufacturing - East Moors Road, Cardiff, CF24 5NN
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
7 Steel Manufacturing (UK) Limited Building 58, Castle Works, East Moors Road, Cardiff. CF24 5NN	Tolling Agreement (for the production of goods which are then sold by 7 Steel) Group Company	04577881	UK

+Add additional rows if required

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.

Any internal company sales are done at arms-length.
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.

FRS102. See Statutory Accounts for summary of significant accounting policies.

Appendix reference:

- . 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.

No change

Appendix reference:

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

1 of January to 31st of Dec (Refer to 2024 annual accounts)

Appendix reference: A5 - FIN 8 - 7 Steel (UK) Limited Annual Accounts 2024

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

No

Appendix reference:

- . 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.

Please refer to the appendix

Appendix reference: A5 - FIN 7 & FIN 8

- . 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.

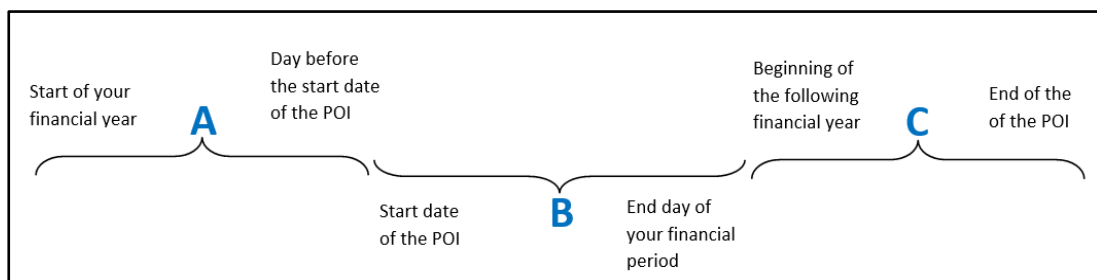
See attached annual accounts for 7 Steel (UK) Holdings Ltd

Appendix reference: A5 - FIN 7 - 7 Steel UK (Holdings) Annual Accounts 2024

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.



Refer to the annual accounts provided and MA is prepared at consolidated level only.

Appendix reference: A5 FIN 8 - 7 Steel (UK) Limited Annual Accounts 2024

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).

Coding system explained in attached documents	
	Appendix reference: Annex B Part 2 – codes 1 and Annex B Part 2 – codes 2

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

Plain round coil feedstock for BS 4449:2005 BS 4482:2005 5.5 to 17mm BS4449 for Ribbed Reinforcing Bar in coil	
	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).

Price is heavily guided by market conditions but the main cause of differential in price would be the carbon content. For the higher carbon material, we would work with an additional premium to cover the additional production costs. There may be premium applied to diameters that are not commonly rolled as well.	
	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.

Reinforcing bar in straight lengths Merchant bar and light sections (hot rolled flats, angles, channels and rounds)
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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.

Completed in Annex	
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	Appendix reference: ER0082 - Producer Questionnaire - Annex_20260210103515 NL
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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 costs managed through the SAP system and based on actual production costs.	
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	Appendix reference:
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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.

Completed in Annex

Appendix reference: ER0082 - Producer Questionnaire - Annex_20260210103515 NL

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.

All manufacture takes place in the UK. Process flow attached
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Appendix reference: Process Flow

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.

The largest cost element (and hence the largest value addition) is in the steelmaking process. However, it is sensible to convert as far as possible to the end product at the main production site.
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Appendix reference:

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

- . 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.

Completed in Annex	
	Appendix reference: ER0082 - Producer Questionnaire - Annex_20260210103515 NL

- . 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.

Very rarely do we purchase any finished goods. If Finished Goods do need to be purchased an agreement with the 7 Steel Group will be made based on current requirement and at arm's length terms.	
	Appendix reference:

- . 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.

It is not in the business model to purchase these materials; hence we rarely purchase from external supplier as disclosed in the Annex.	
	Appendix reference:ER0082 - Producer Questionnaire - Annex_20260210103515 NL

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.

Completed in Annex

Appendix reference:ER0082 - Producer Questionnaire - Annex_20260210103515 NL

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.

Prices determined by market factors + cost base

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).

Any customer rebates are agreed with individual customers and will vary customer by customer, year on year. Rebates are normally triggered by volume and can be paid monthly, quarterly or annually

Appendix reference:

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

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

Sales are normally done on the basis of delivered to customer. We are therefore responsible for the cost. We would try to reflect any additional delivery costs within our selling prices. We work with historical and forecast data on transport costs to adjust as required.

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.

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

- . 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.

Completed in Annex

Appendix reference:ER0082 - Producer Questionnaire - Annex_20260210103515 NL
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- . Can you describe - with reference to the injury factors - how you think the current measures are having an impact on your business?

Threat of injury is the key issue. Please see answer 3.

Appendix reference:

- . 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.

If the existing anti-dumping measures were no longer applied or expired, it is likely there would be a surge of Chinese imports of wire rod into the UK. China exports wire rod volumes monthly that are many times the total annual volume of the UK wire rod market. Without the anti-dumping measures in place, it is almost certain

that some of these exports would arrive in the UK. The volumes would easily destroy the UK market and inflict huge injury and because the Chinese steel industry has direct and indirect Government support, the prices the Chinese wire rod makers are prepared to offer would cause immediate injury to the existing UK producers (and potentially displace existing import sources). An example of the aggressive and damaging attack on the UK market is evidenced by the dramatic increase in Chinese HFP rebar deliveries in 2014/2015 to the UK. It should be remembered that rebar in coil (a similar product to HFP rebar for similar end uses) is included in the wire rod definition as it is produced on wire rod mills.

Appendix reference:

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

Profit levels for UK producers of like goods (wire rod) were significantly eroded during the injury period due to a combination of a declining domestic demand, intense price competition on international markets, and high energy and decarbonisation costs in the UK. Collectively, these pressures suppressed profitability by driving down achievable prices and limiting producers' ability to maintain efficient capacity utilisation or reinvest in their operations. The UK wire rod market has been, and remains, a very competitive environment without any direct Chinese involvement. Any dilution of existing anti-dumping measures would mean further erosion of profitability.

Appendix reference:

- 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.

Current levels of profitability are an indication of expected profitability if measures are to remain. If anti-dumping measures no longer applied, profitability would be severely affected as described in Q3.

Appendix reference:

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

Sales prices are negotiated on the basis of what the market will bear. The removal of existing anti-dumping measures would lead to a substantially worse sales price. In turn this would lead to worse margin and less ability to invest in the sector.

Appendix reference:

- . 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.

If existing anti-dumping measures no longer applied/ expired, we believe there would be a surge of Chinese imports for the like products. This would have a significant effect on the sales/production of these products in Cardiff including cessation of production. There would be consequences for the direct employees associated with the production but also for indirect employees making either the feedstock for the products or involved in the support functions around the direct manufacture. For the industry, the reappearance of Chinese imports may displace other import sources (as witnessed on rebar in 2014/15) and ultimately lead to less competition in the market.

Appendix reference:

- . 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.

Threat of Injury is the key issue. Please refer to answer for Q7.

Appendix reference:

E2 Likelihood of Injury

- . 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.

Chinese producers of wire rod operate with extremely high production volumes, vast installed capacity, and substantial surplus capacity, all of which enable largescale export activity. In 2024, China produced approximately 134.97 million tonnes of wire rod, supported by an estimated total capacity of around 180 million tonnes, leaving more than 45 million tonnes of unused surplus capacity. Capacity utilisation levels—based on the highest rates observed in the past decade—remain well below full capacity, confirming persistent overcapacity. These conditions, combined with export volumes of 6.31 million tonnes in 2024, demonstrate that Chinese producers possess both the ability and incentive to divert significant volumes to external markets, including the UK, if current measures were removed

Appendix reference: E2 Part 1 Likelihood of Injury

- 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.

“The latest data show that, in 2024, the median Chinese firm received 15 times more subsidies relative to its asset size than a median firm elsewhere, compared to 10 times more in previous years. Moreover, China’s steel subsidy rate has nearly doubled since 2019, a trend that will sustain excess capacity in the years ahead absent fundamental structural reforms to address the underlying distortions. The Committee’s new monitoring work shows that 59 new provincial and municipal subsidy programmes to support the domestic steel industry were introduced in China in 2025. Many of these programmes were found by the Steel Committee to be highly distortive. Moreover, capacity swap programmes to replace BF-BOF with EAF and other low-emission technologies are not delivering the expected net capacity reductions, as new low-emission capacity is being added without equivalent retirement of existing capacity.” ([99th Session of the Steel Committee: Statement by the Chair](#))

We understand that Chinese wire rod capacity has remained broadly stable in headline terms but has been significantly upgraded, with newer, larger mills replacing older ones and a growing share focused on export-grade products.

As a result, overall utilisation has likely softened (to around the low-70% range on industry benchmarks) due to transition and demand pressures, while utilisation at modern, export-oriented capacity has strengthened (mid-80%+ range).

In effect, the sector has shifted from broadly high utilisation of mixed-quality assets to more selective, higher utilisation of competitive export capacity.

Recent capacity and historical changes can be seen in information sourced from Kallanish in the annex.

Appendix reference: Annex E2 Part 2
Likelihood of Injury

- 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.

7 Steel UK have been unable to source material on this area and understand UK Steel also do not have this material.

Appendix reference:

- 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?

Many mills producing wire rod can also produce rebar (straight or coiled), merchant bar, and other long products using the same equipment and processes. Switching production to wire rod is highly feasible, requiring minimal adjustments, and is a routine operational capability of Chinese long product producers. This flexibility significantly increases the risk of rapid diversion of supply toward the UK market if antidumping measures were removed, especially given China's substantial surplus capacity (45+ Mt).

Appendix reference: E2 part 4 Likelihood of Injury

- 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?

UK consumer preference does not appear to differ materially between the like goods produced domestically (UK made wire rod) and the goods subject to review (Chinese wire rod). Our original submission and Annex E2 Part 4 makes clear that wire rod and closely related long steel products—such as rebar in coil—are highly interchangeable, with some products being “exactly the same product... although presented in coil format rather than straight lengths.” This means UK purchasers generally treat these materials as substitutable, with little distinction based on origin.

As a result, any differences in preference are driven not by product characteristics but by price, where Chinese exports have historically been significantly cheaper. This price difference has a direct impact on UK producers, increasing the risk of market displacement if dumped imports re-enter the market.

Appendix reference:

- 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.

There are no meaningful differences in quality, specifications, or standards between UK manufactured like goods (wire rod) and the goods subject to review. We would highlight that 7 Steel UK produce low carbon products from an EAF and that imports are likely to be high carbon, blast furnace products. Our original submission highlights that many long product mills produce interchangeable products, and in some cases the goods are identical—for example, rebar in coil is “exactly the same product” as straight length rebar but classified as wire rod. This demonstrates that Chinese origin wire rod and UK produced wire rod meet the same functional requirements and are used for the same applications. The key difference is price, with Chinese export offers historically at least 20% lower than UK domestic prices, creating strong competitive pressure despite equivalent product characteristics.

Appendix reference:

- 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.

Overseas producers in the People’s Republic of China can easily meet UK requirements and standards for wire rod because the products they manufacture are already functionally identical and fully interchangeable with UK produced like goods. The original submissions outlines that Chinese producers routinely manufacture long steel products, including wire rod and rebar in coil, which are in

some cases “exactly the same product” as UK produced items and meet the same technical specifications. The high degree of product interchangeability, combined with largescale, modern production facilities and substantial unused capacity, means Chinese mills are technically well equipped to supply wire rod that conforms to UK standards without difficulty.

Appendix reference:

- . 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

UK Market:

Demand for wire rod in the UK has declined by 20% over the past four years, demonstrating a weakening domestic consumption environment. The UK market remains small (approx. 0.55 Mt/year) and sensitive to high energy costs and economic fluctuations, making it very vulnerable when overall demand is subdued.

Exporters’ Domestic Market (China):

China’s domestic steel demand has softened, contributing to largescale surplus capacity and an increased reliance on export markets. This fall in internal demand is one of the main drivers behind China’s record steel exports in 2024 (110.72 Mt) and its significant wire rod export volumes (6.31 Mt). As domestic demand remains structurally weak, export dependence is expected to continue.

Third Country Markets:

Global steel demand growth has slowed, and many regions are already protected by antidumping measures against Chinese steel. In 2024 alone, 29 major trade cases were initiated against Chinese steel exports, indicating tightening access to third country markets and increasing the likelihood of trade diversion toward more open markets such as the UK if measures were removed. This suggests that weak or constrained demand in third country markets will continue to push surplus Chinese volumes into any unprotected destination.

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.)

Our original submission provides details on domestic Chinese prices for the goods subject to review. [REDACTED]

Appendix reference: Annex F [REDACTED]
[REDACTED]

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).

Export prices to the UK:

Chinese mesh grade wire rod export offers in May–June 2025 were £346-362 per tonne FOB China. After adding freight, insurance, and port costs of £45–£55 per tonne, the delivered UK price (CIF) would be £401-417 per tonne. These figures represent the effective export price level for Chinese producers, but we do not believe exports reach the UK.

Export prices to other countries:

Chinese wire rod exports reached 6.31 million tonnes in 2024, shipped to a wide range of third country markets. Chinese export prices are typically 15–20% lower than European domestic prices, reflecting a consistent pattern of lower priced export offers globally. Additionally, global Chinese steel exports reached 110.72 million tonnes in 2024, the highest in nine years, indicating strong reliance on low priced exports to multiple markets.

Are these exports dumped?

Yes. The evidence strongly suggests that these exports have been sold at dumped prices:

- Chinese export offers were £60-£100 per tonne lower than verified UK domestic transaction prices (£490-£540/t), a differential equivalent to at least 20% undercutting.
- There is a global pattern of Chinese undercutting and with 29 major antidumping cases initiated against Chinese steel in 2024 alone and latest information indicates that China's flooding of global steel markets led to 66 new trade cases being initiated in 2025-2026 with flat products facing the highest number of trade restrictions.
- The TRA's earlier findings (2022 review) concluded that China had previously dumped wire rod into the UK, and the structural conditions—large surplus capacity, state influenced pricing, and weak domestic demand—remain unchanged or have worsened.

Appendix reference: [REDACTED]

[REDACTED]. and

[REDACTED]

[REDACTED]

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

The 7 Steel UK submission provides clear evidence of several strong incentives for overseas (Chinese) producers to export wire rod.

1. Large surplus capacity encourages exports

China has over 45 million tonnes of unused wire rod capacity, making exports an essential outlet for absorbing excess production.

2. Weak domestic demand increases reliance on exports

Chinese domestic steel demand has softened, contributing to high stock levels and incentivising producers to look outward to maintain utilisation. This is reflected in China reaching 110.72 million tonnes of total steel exports in 2024, the highest in nine years.

3. State intervention and non-commercial pricing

Our submission details extensive government support—subsidised inputs, state directed financing, and price distortions—which leads to artificially low domestic prices. These non-commercial factors make it profitable for Chinese producers to export at lower, state supported prices, encouraging high export volumes.

4. Limited access to other markets creates trade diversion incentives

With 29 major antidumping cases initiated against Chinese steel in 2024, producers face barriers in many markets and are therefore incentivised to divert exports into more open markets—such as the UK if measures were removed.

In summary, structural overcapacity, weak internal demand, state support mechanisms, and shrinking access to other markets collectively create strong incentives for Chinese producers to export wire rod aggressively.

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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.

<p>We are not aware of any specific, confirmed cases of circumvention relating directly to the current wire rod measures. However, we consider the risk of circumvention to be significant. As outlined in the original submission and elsewhere in this questionnaire, Chinese producers can easily switch between rebar (category 13) and wire rod (category 16) because rebar in coil is “exactly the same product” as straight length rebar but classified differently for customs purposes.</p>
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<p>This high degree of product interchangeability means overseas suppliers could readily alter product form or classification to avoid duties. For this reason, we believe the TRA must remain vigilant, as the structure of Chinese production creates a clear opportunity and incentive for circumvention should measures be removed or weakened.</p>

<p>The decline in UK wire rod demand may be as a result of cheap Chinese wire rod being supplied to other countries and converted into wire and wire products which are then imported as finished goods into the UK. This could be described as a way of circumvention of the anti-dumping measures.</p>
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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.

<p>Yes. We are aware that multiple countries have imposed trade remedy measures on Chinese steel products, including wire rod. The evidence shows that in 2024 alone; 29 major trade cases were initiated globally against Chinese steel exports with latest information indicating 66 new trade cases being initiated in 2025-2026 with flat products facing the highest number of trade restrictions. These cases reflect widespread concern about China’s pricing practices and structural overcapacity.</p>

Both the EU and the United States have maintained antidumping and countervailing duties on Chinese wire rod and closely related steel products. The European Commission confirmed the continuation of duties in its most recent expiry review, and the U.S. Department of Commerce found subsidy margins of up to 193.31% on Chinese wire rod exports in a 2025 sunset review.

Impact on Trade Flows:

Countries that have imposed measures have seen reduced direct imports from China. In many cases, this has led to trade diversion, with Chinese exports being redirected to less protected markets. When access to markets such as the EU and U.S. is restricted, China is incentivised to reroute excess volumes into more open markets, which would include the UK if current measures were removed.

Conversely, countries that have not imposed measures have typically experienced surges in low priced imports and displacement of traditional suppliers—mirroring past UK experience in reinforcing bar, where dumped Chinese imports eliminated other import sources before measures were introduced.

In our view, this global pattern clearly demonstrates that without robust trade remedy measures, markets become highly exposed to diverted Chinese export volumes, leading to rapid price depression and injury to domestic producers.

The decline in UK wire rod demand may be as a result of cheap Chinese wire rod being supplied to other countries and converted into wire and wire products which are then imported as finished goods into the UK. This could be described as a way of circumvention of the anti-dumping measures.

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.

7Steel UK maintains, as set out in our original submission, that a Particular Market Situation (PMS) exists in the People's Republic of China (PRC) in respect of wire rod and its associated inputs.

Our evidence demonstrates that prices and costs in the Chinese steel industry do not reflect normal market conditions but are significantly shaped by state intervention. This includes:

- Artificially low domestic and export prices for wire rod, with Chinese FOB export prices remaining 15–20% below UK domestic prices, even after freight adjustments.
- Extensive non-commercial government influence over key inputs such as energy, raw materials, finance, labour and land—each documented in our submission and supported by findings in EU and U.S. trade defence investigations.
- State ownership and policy control over major Chinese steel producers, meaning pricing, output and investment decisions are not determined by market forces.
- A structural overcapacity problem, including over 45 million tonnes of surplus wire rod capacity, that depresses prices and encourages largescale, low-priced exports.

As outlined in our submission these factors result in systematic distortions across the entire steel value chain. The effect is that Chinese wire rod prices are not reliable indicators of fair market value and cannot be used as a basis for normal value assessment.

We therefore reiterate our position that a PMS clearly exists in the PRC steel market for the goods subject to review and invite the TRA to recognise this as part of its analysis.

Appendix reference: Annex G1 Particular
Market Situation

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).

Over the past five years, the UK wire rod market has faced major structural and competitive changes, as well as the continuing challenges associated with energy costs that is common to all UK steel production. Consumer preference has not changed in terms of product requirements, but purchasing behaviour has increasingly shifted toward lower priced imports, intensifying pressure on domestic pricing, as customers seek to protect their own competitive position.

The period has also seen the UK market become more fragile and exposed, with overall domestic steel demand weakening and national production falling to historically low levels. At the same time, global supply conditions have deteriorated due to persistent global overcapacity, growing surplus volumes, and a surge in Chinese steel exports—reaching their highest level in nine years—which has increased competitive pressure on all open markets. Increased protection through various trade remedies and tariffs in some countries has led to those producers with excess capacity seeking out new markets or and customers for their sales.

There have been notable changes in market participants, with ongoing uncertainty surrounding the viability of UK long products capacity, including public indications of potential domestic mill closures in response to sustained import pressure. Some assets in the long products sector have been taken under Government control. Regulatory factors—including the continuation of UK trade remedy measures—have therefore become increasingly important in stabilising the domestic industry.

In summary, the last five years have been marked by weaker UK demand, growing import pressure, greater exposure to global overcapacity, and a more precarious operating environment for UK manufacturers.

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.

End uses of our wire rod products are mainly for the construction industry. Product under commodity code 7213100000 is directly used for the reinforcing of concrete. Codes 7213911000 and 7213991000 are commonly drawn to a smaller size and then formed into finished products such as mesh fabric, fencing, fasteners and light engineering applications. 7213917000 products are used for drawing and forming mainly into springs for 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)?

Complimentary products to wire rod are reinforced concrete (all infrastructure including strategic assets such as nuclear power stations), all machinery used in manufacturing (fasteners etc) automotive parts and multiple household items including beds and sofas.

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?

Based on our knowledge of the UK market, there are only two UK based producers of wire rod: 7Steel UK and British Steel.

In contrast, many foreign producers sell wire rod into the UK market.

Both UK and foreign wire rod producers are typically largescale industrial operations, as the production of wire rod requires substantial capital investment, continuous production facilities and significant operating scale. There are no small producers in this market.

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].

Total UK consumption of wire rod products is approximately 0.6 million tonnes per year. This figure reflects the overall size of the UK market and is used throughout our analysis of capacity, import penetration and market vulnerability.

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 products produced by different manufacturers are highly similar and largely interchangeable, with no meaningful differences in branding, packaging, or product features. There are some variations on product grade as relevant to each application but there is overlap across producers as to the grades of material that can be produced – e.g. higher carbon content. As outlined in our submission, many long product mills - especially those producing rebar and wire rod - use the same equipment and processes, and in some cases the products are “exactly the same” (e.g. rebar in coil classified as wire rod).

Product standards, mechanical properties, and dimensional tolerances are well-established across the industry, meaning wire rod from different producers meets broadly identical specifications.

In short, wire rod is a standardised commodity product, and Chinese produced material competes directly with UK produced material on a like for like basis.

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.

Cost of entry to the market is high. Investment in new wire rod production facilities (in common with most steel products) is significant and returns on that investment are low so generally investment in new wire rod production is limited to emerging nations who are establishing a steel industry for strategic reasons of self-sufficiency (they want to make steel and wire rod for construction purposes). Producers who have existing wire rod assets will update their facilities to enhance productivity, meet increased customer demands and seek to improve the returns on sunken investments.

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.

Cost of entry to the market is high. Investment in new wire rod production facilities (in common with most steel products) is significant and returns on that investment are low so generally investment in new wire rod production is limited to emerging nations who are establishing a steel industry for strategic reasons of self-sufficiency (they want to make steel and wire rod for construction purposes). Producers who have existing wire rod assets will update their facilities to enhance productivity, meet increased customer demands and seek to improve the returns on sunken investments.

Costs of withdrawal from the market are high, including redundancy costs and the write-off of investments. Producers therefore tend to work on the last man standing principle that others may leave the market first and allow them to make more reasonable returns.

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?

If the price of wire rod products increased across the UK market, we would not expect a significant reduction in underlying demand. Wire rod is an essential industrial input used in construction reinforcement, mesh production, wiredrawing, fasteners, and other critical manufacturing processes. These applications have no practical substitutes, meaning demand is largely derived and inelastic.

Downstream users typically continue purchasing wire rod even at higher prices because their own production processes depend on it. While some customers may adjust purchasing volumes in the short term—such as reducing inventories or delaying nonurgent orders—overall demand would remain relatively stable. The ability of consumers to switch to alternative materials is extremely limited, and most cost impacts are absorbed further down the supply chain rather than avoided through reduced consumption.

In short, higher prices may influence buying behaviour at the margin, but they would not materially reduce the total demand for wire rod products in the UK.

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?

Quality and service do play their part in a consumer's decision to an extent but the biggest driver to purchase would be lead time and price.

Appendix reference:

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

7-Steel has latent capacity on wire rod and can respond quickly to increases in demand or reductions in imports. Given the flexibility of our production facilities, we could easily respond to higher demand. Even when nominal capacity is reached, we would divert production away from export first and concentrate on the domestic market. Secondly, we could shift the balance between products manufactured at our rod and bar mill, increasing the proportion of wire rod. As evidenced by our production in previous years, there is ample latent 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

Over the injury period, we have not seen any fundamental changes in consumer preferences for wire rod products themselves. Wire rod remains a standardised, mature industrial input, and downstream users continue to require the same core specifications.

However, there have been significant market driven changes in demand, almost all linked to price movements and import pressure:

- **Prices of Goods:**
UK domestic prices have come under sustained pressure due to low priced imports. Chinese export offers were 15–20% below UK producer prices, directly depressing achievable UK selling prices and reducing margins.
- **Substitutes and Complementary Goods:**
There have been no meaningful shifts in substitutes, as wire rod has no practical alternative in its core applications. Complementary products—such as downstream wiredrawing and mesh products—have continued to depend on competitively priced wire rod.
- **Consumer Behaviour:**
Although preferences have not changed, buyer behaviour has, with UK customers increasingly gravitating toward the cheapest import option due to strong price sensitivity.
- **Technological Developments:**
No major technological changes affected demand or product characteristics; the main pressures remained economic rather than technical.
- **Taxes, Subsidies, and Policy:**
The period saw continuing evidence of state supported pricing and subsidised inputs in China, contributing to artificially low export prices and further distorting demand away from UK produced goods.

In summary, the key changes in demand were caused not by shifts in product preference or technology but by a generalised reduction in wire rod demand. This reduction could have been associated with a hollowing out of industrial activity as wire and wire products have been substituted for wire rod.

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Appendix reference:

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

At this stage, we do not foresee any major structural changes in demand or customer preferences for wire rod products over the next five years. Wire rod is a mature, essential industrial input, and its usage is driven primarily by levels of UK construction, manufacturing and infrastructure activity—rather than shifts in product preference.

Any changes in demand are therefore expected to be cyclical rather than transformational, reflecting wider economic conditions. Product specifications and customer requirements are also expected to remain stable, as the applications for wire rod (mesh, fasteners, wiredrawing, reinforcement products) are long-established and not subject to rapid technological change.

There is the potential for decrease in Wire Rod demand coming from further reductions in industrial activity in the UK.

Appendix reference:

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

In the UK market, wire rod is distributed primarily through direct mill to customer sales. Most volumes are supplied directly to downstream manufacturers—such as mesh producers, wire drawers, fastener makers and reinforcement fabricators—under ongoing supply arrangements.

Appendix reference:

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

Within the UK market, wire rod is used by a wide range of downstream manufacturing and construction related businesses. Key users include:

- Construction product manufacturers – producing mesh, welded fabric, reinforcement products and other applications where wire rod is drawn, cut or processed for structural use.
- Wiredrawing and fastener manufacturers – producing nails, screws, bolts, fencing wire, cables and general industrial wire products.
- Engineering and industrial fabricators – using wire rod as a feedstock for springs, chains, wire rope, and mechanical components.
- Fencing, agricultural and civils suppliers – converting rod into wire for fencing, barriers, gabions and similar applications.

In all these sectors, wire rod is a fundamental input material, typically processed further before reaching end users in construction, infrastructure, engineering, or manufacturing.

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.

Wire rod products from the People's Republic of China compete directly with the wire rod that we manufacture in the UK. As set out in our submission, these products are highly interchangeable, and in some cases—such as rebar in coil—are “exactly the same product” but classified differently. This means UK consumers treat Chinese and UK produced wire rod as fully substitutable in terms of quality, specification and end use.

In practice, the only meaningful difference is price, with Chinese export offers historically up to 20% lower than UK domestic prices. As a result, there are no significant factors that prevent UK consumers from opting for the cheapest material available. When low priced Chinese wire rod has previously entered the market, buyers have rapidly switched away from domestic supply, leading to substantial loss of UK market share.

Therefore, Chinese wire rod competes directly and immediately with our products, and UK consumers show little to no resistance to purchasing the lowest priced option when it meets the same technical requirements.

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.

No

Appendix reference:

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

There have been no major technological changes in recent years that fundamentally alter the characteristics or demand for wire rod products. Wire rod remains a mature, standardised long steel product, with specifications largely driven by well-established construction and industrial requirements. As noted in our original submission, any competitive pressures in the market are not the result of technology shifts but rather structural overcapacity and non-commercial pricing in China, which keep prices artificially low.

While incremental improvements continue in areas such as process control, efficiency, and environmental performance, these developments do not materially change the nature of the product or its uses. The key drivers of market dynamics remain price competition, capacity utilisation, and trade distorted export behaviour, rather than technology led changes in production or end use applications.

Appendix reference:

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

Beyond the factors already outlined elsewhere, the wire rod market is also influenced by general construction and industrial activity cycles, which can create light seasonal variations in demand—typically with stronger activity in spring and summer when construction output is higher, and softer demand during winter months. Broader macroeconomic conditions, including interest rates, infrastructure investment levels, and overall confidence in the manufacturing sector, also play an important role in shaping wire rod consumption.

In addition, ongoing volatility in global steelmaking costs—particularly energy markets—can affect buying patterns and stocking behaviour, even if they do not materially affect the underlying characteristics of the product. Overall, these factors contribute to short-term fluctuations but do not alter the structural issues (such as global overcapacity and import pressure) that remain the primary drivers of market outcomes.

Appendix reference:

H3 Changes affecting your business / the market

1. 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.
2. 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.

Completed in Annex

Appendix reference: : ER0082 - Producer Questionnaire - Annex_20260210103515 NL

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

Although each site has its own workforce and operational responsibilities, they are interdependent and form one continuous UK manufacturing process:

- The melt shop supplies all semi-finished products required for rolling.
- The rolling mill determines product specifications, volumes, and quality requirements.
- Production planning, quality assurance, and output performance are a shared resource and coordinated across both sites.

Appendix reference:

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

Wire rod production is central to our business and its long-term viability. As one of only two domestic producers in the UK, this product forms a core part of our manufacturing operations, revenue base, and employment footprint. The stability of wire rod production directly underpins our ability to maintain efficient steelmaking, sustain jobs, and support wider investment in our plant, technology, and decarbonisation plans.

In short, wire rod is strategically essential to 7Steel UK—any disruption to its competitive position would have a material and immediate impact on the company.

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.

1. Impact on UK Domestic Prices

Higher priced imports would ease the intense price pressure currently placed on UK producers. Given the UK market's high price sensitivity, import prices act as a defacto ceiling on domestic pricing. Therefore, if imports became more expensive, UK domestic prices would be able to rise to more sustainable levels, reducing the margin compression caused by persistent undercutting from low-priced foreign supply.

2. Impact on UK Production

An increase in import prices would improve the competitive position of UK made wire rod. This would likely lead to higher domestic production volumes, stronger mill utilisation, and improved stability for UK producers. As noted throughout our submission, import pressure has been a major factor in the decline of UK output; reducing that pressure would support recovery in domestic production.

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 your company operates across more than one site);
- b) on domestic sales of wire rod products;
- c) on your plans for investment/expansion.

If the existing antidumping measure were allowed to expire, 7Steel UK would face immediate and severe commercial harm.

Impact on Domestic Sales:

Chinese export offers have historically undercut UK domestic prices by 15–20%, creating unsustainable price pressure for UK producers. Without the current measure, low-priced Chinese wire rod would re-enter the market, leading to rapid loss of domestic sales volumes, further margin deterioration, and displacement similar to what occurred previously in the UK rebar market.

Impact on Production and Site Operations:

The UK wire rod market is already fragile, with domestic deliveries having fallen more than 25% over recent years despite the measures being in place. Removal of protection would accelerate this decline. Given the small scale of UK demand relative to China's 45+ million tonnes of unused capacity, even a small diversion of Chinese supply would severely undermine the viability of UK production. This creates a material risk to ongoing operations at our manufacturing site.

Impact on Investment and Expansion Plans:

Margins in wire rod production are already extremely thin. Chinese undercutting at previously observed levels would make it impossible to justify future investment in plant, technology, decarbonisation, or productivity improvements. The company would be forced to pause or cancel planned investments due to market instability and the likelihood of sustained negative returns.

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.

Yes, the expiry of the existing antidumping measure would create several significant indirect effects on both our business and the wider UK wire rod industry.

First, the re-entry of low-priced Chinese wire rod would trigger market wide price depression, not only for wire rod but also for downstream products that depend on it. This would undermine the viability of UK suppliers across the value chain.

Second, sustained undercutting would force consumers to switch away from UK produced material purely on price, even though product characteristics are equivalent. This would accelerate the existing trend of falling domestic deliveries, which have already declined by more than 25% despite measures being in place.

Third, lower prices and shrinking volumes would directly reduce our ability to fund investment, innovation, decarbonisation, and maintenance, as margins are already extremely thin. The wider industry would suffer similar effects, increasing the risk of capacity loss and long-term erosion of domestic capability.

Finally, the UK market would become more vulnerable to supply chain instability, as reliance on a single low-priced source increases risk if global conditions shift or future restrictions arise.

In summary, expiry of the measure would have far-reaching negative consequences—well beyond immediate price and volume impacts—by damaging competitiveness, investment, and the resilience of the UK wire rod supply base.

Appendix reference:

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

Any reduction in UK production will lead to less demand for raw materials (impact on scrap suppliers in UK) and fewer demands for ancillary services e.g. roll makers, engineering supplies, as well as less haulage required.

Appendix reference:

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

In the UK wire rod market, changes in wire rod prices are passed through to final consumers. Wire rod is an upstream industrial input, and downstream

manufacturers—such as mesh producers, fastener makers, and reinforcement product manufacturers—operate on tight margins and face strong competition. As a result, they are often unable to absorb significant cost increases themselves and would need to pass these to the final consumer.

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.

In addition to the points already raised, we believe the TRA should be aware of the broader systemic risks that would arise if the existing antidumping measure were to expire. The most important of these is the scale mismatch between UK demand (around 0.6 million tonnes per year) and China's surplus wire rod capacity of more than 45 million tonnes, which means even a very small diversion of Chinese exports could destabilise the UK market almost immediately.

The TRA should also consider the pattern of trade diversion already seen globally: as more countries impose trade remedy measures on Chinese steel, unprotected markets such as the UK become increasingly attractive targets. Allowing the measure to lapse would therefore expose the UK to sharply increased import pressure.

Finally, the expiry of the measure would undermine the sector's ability to meet long-term investment and decarbonisation commitments, as sustained price suppression from dumped imports would remove the margins required to upgrade plant and equipment. In our view, these structural and long term risks are critical to assessing the full impact of removing the current measure.

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

We are not aware of any evidence to suggest that extending or allowing the antidumping measure to expire would have a disproportionate impact on any protected group under the Equality Act 2010. Wire rod is an industrial input, and any impacts of the measure—positive or negative—would be felt at the level of business operations, supply chains, and market competition, rather than directly on individuals with protected characteristics.

Appendix reference:

Checklist

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Section title	Have you responded to all questions? [Yes or No]
Section A	Company structure and operations	Yes
Section B	About your goods	Yes
Section C	Costs and production	Yes
Section D	Sales	Yes
Section E	Injury to your company	Yes
Section F	Dumping	Yes

Section G	Particular Market Situation	Yes
Section H	Understanding the UK market and impacts of the measure expiring	Yes

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
A2.2	FIN 1 - 7 Steel incorporation
A2.2 / A2.3	FIN 2 - 7 Steel Change of name
A2.3	FIN 3- 7 Steel Ceasing Person with Significant Control
A2.3	FIN 4 - 7 Steel Change of person with significant control
A2.3	FIN 5 - 7 Steel Change of relevant legal entity
A3.2	FIN 6 - 7 Steel UK Entity Structure
A5	FIN 7- 7 Steel UK (Holdings) Annual Accounts 2024
A5	FIN 8 - 7 Steel (UK) Limited Annual Accounts 2024
B2	Annex B Part 2 Codes 1 and Codes 2
C1.1	ER0082 - Producer Questionnaire Annex_20260210103515 NL – non confidential version
C2.1	
C3	
D2.1	
E1	
H3.2	
C2.2	Process Flow
D3.4	[REDACTED]
D3.4 part 2	[REDACTED]
E2	E2 Part 1 Likelihood of Injury E2 Part 2 Likelihood of Injury E2 part 4 Likelihood of Injury
F1	Annex F [REDACTED]
F2	Annex F [REDACTED]
G1	Annex G1 Particular Market Situation

+Add additional rows as required

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.