



Verification report – UK Producer

Case TD0014: Heavy Plate exported from the People's Republic of China

Period of Investigation (POI):	1 January 2021 – 31 December 2021
Injury Period:	1 January 2018 – 31 December 2021
Date of report:	30 September 2022
Case team contact details:	TD0014@traderemedies.gov.uk
Company verified:	Spartan UK Limited

For further details, please see the [Notice of Initiation](#) on the public file.



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Executive Summary

On 25 January 2022, the Trade Remedies Authority (TRA) initiated a transition review of an anti-dumping measure on certain heavy plate of non-alloy or other alloy steel originating in the People's Republic of China ('goods subject to review').

As part of the review, the TRA sought to assess the completeness, relevance, and accuracy of the information the domestic producer (Spartan UK LTD, here in after referred to as Spartan) provided in its questionnaire response. This covered its company structure and operations, the goods it produces, sales, costs and production figures, injury, and the economic impact of varying or revoking the measures.

During the verification process, the TRA compared Spartan's questionnaire responses, including the data annexed to the questionnaire (annex data) and other accompanying evidence to information from open sources, such as Companies House, HM Revenue & Customs (HMRC) and Spartan's website. We checked information for internal consistency and reconciled financial data to the audited financial statements.

The TRA conducted an in-person walkthrough to understand the accounting processes used by Spartan, a site tour to aid our understanding of the heavy plate production process and conducted verification activities remotely. We gave Spartan the opportunity to provide further detail or clarify outstanding questions during remote verification and via written correspondence.

The TRA does not have any concerns to report in respect of Spartan. We were able to verify the information provided by Spartan in its:

- questionnaire response;
- annex data;
- other written submissions and evidence provided during the verification process in response to verification queries.

Based on the verification activities that we have undertaken we have concluded that we have a reasonable level of assurance in the accuracy and completeness of the information provided by Spartan, and we can use it for the purpose of this review.

Purpose of verification

The purpose of the TRA's verification activity is to provide the assurance considered necessary to decide as to whether the information (data) provided by Spartan is verifiable and can be used for the purposes of our investigation. We can draw various levels of assurance on the completeness, accuracy and relevance of information deemed verifiable. Such data may then be considered in the



assessments and analysis carried out as part of this transition review. This will form the basis for establishing appropriate measures where necessary, and to assess whether these are in the UK's economic interest.

We have carried out verification activities using desk and remote analysis including on-site work. The activities undertaken did not seek to verify all information provided but to undertake the work considered appropriate and possible within the time constraints of the investigation to obtain assurance on which to base a decision.

This verification report documents the work we have completed, the checks the case team has carried out and conclusions we have reached about the reliability of information provided by Spartan.

Confidential information

Spartan must provide a non-confidential version of the verification report marked as "non-confidential" in the header of the non-confidential verification report.

If any information contained in the confidential verification report is considered confidential, Spartan should delete or redact those sections and provide a non-confidential summary of the information which has been removed. Spartan must specify such information, provide reasons as to why the TRA should treat the particular information as confidential and create a non-confidential version of it (see also [public guidance](#)).

The non-confidential version of the verification report will be placed on the public file.



Verification

Please find below a summary of work that has been completed and the checks that have been carried out by the case team to determine whether the information provided by Spartan in their questionnaire response is verifiable.

A. Company structure and associations

What information was considered
<p>We confirmed information provided on the following areas:</p> <ul style="list-style-type: none"> • general set up and ownership of the company; • facility locations; • associated companies; • accounting practices; • accounting systems used.
<p><i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i></p>
<p>No redactions</p>
How the information was checked
<p>The TRA cross-checked the information provided by Spartan regarding the company's general set up, ownership, associated parties, function and products by examining official documents published on Companies House. We found the information from these sources to be consistent with the information provided by the company in its questionnaire response.</p> <p>We also compared the information provided by Spartan against its own website, confirming its product range and the location of its facilities and found no issues.</p> <p>We assessed the reliability of the financial statements for year ended 31 December 2021 and confirmed:</p> <ul style="list-style-type: none"> • the financial accounts for the POI were independently audited and were prepared in accordance with the UK Generally Accepted Accounting Practice (UK GAAP); • that the auditors had concluded that the accounts were 'true and fair' and there were no qualifications made; • that the information provided by Spartan in its questionnaire response regarding its ownership and associated companies was consistent with the audited financial statements for the year ended 31 December 2021. <p>We also used the information in the audited financial reports and additional information obtained during our accounting systems walkthrough visit on 22 June 2022 to verify Spartan's accounting practices and policies. This included their accounting software, financial year convention, stock valuation methodology and revenue recognition policy. We assessed Spartan's sales and accounting applications and have reasonable assurance that these are effective and can be relied on.</p>



Overall, the existence of Spartan and associated companies can be verified with a reasonable level of assurance that the information provided in the questionnaire response about ownership, location, establishment date and associated companies is accurate and fairly represents their submission. We have verified information provided in Spartan's questionnaire response to Companies House submissions, open-source documents and the audited annual accounts dated 31 December 2021 where possible. We have reviewed the information about the accounting system in the questionnaire and ensured it aligned with the understanding we gained during the accounting walkthrough.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Exceptions/Findings/Adjustments

The TRA has no exceptions, findings, or adjustments to report with regards to Spartan's structure and associations.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Conclusions

The information relating to company structure and associations provided by Spartan is verifiable. Based on the work we have done, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for this transition review.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

B. Goods

What information was considered

- Spartan's claim the goods they produce, and the like goods are the same;
- product control number (PCN) allocations;
- sample of sales documents;
- commodity code allocations;
- Raw material inventory valuation method.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions



How the information was checked

The TRA considered and reviewed the domestically produced goods to determine whether they are 'like goods' defined in paragraph 7(1) of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 as: 'a) goods which are like those goods in all respects, or b) if there are no such goods, goods which, although not alike in all respects, have characteristics closely resembling those of the goods in question'.

We analysed physical characteristics such as thickness, width, steel grade, manufacturing process, and finish and have confirmed Spartan produce goods which are identical to the goods subject to review.

We used a sample of sales documents selected for verification activities to analyse the physical characteristics of the like goods and reconstructed allocated PCNs for the selected sample. We were able to reconstruct the allocated PCNs and confirm the PCN allocation method was accurate.

We reviewed the mapping reference sheet used by Spartan to assign each PCN to a commodity code and determined it was accurate.

We used the audited financial accounts for the financial year ending December 2021 and established that Spartan's raw material valuation methodology was suitable for this product type and confirmed alignment with the UK GAAP.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Exceptions/Findings/Adjustments

The TRA has no exceptions, findings, or adjustments to report with regards to the like goods.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Conclusions

The information relating to the company's goods that Spartan has provided us is verifiable. Based on the work we have done, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for this transition review.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions



C. Costs

What information was considered

Upwards verification: reconciling the financial data submitted to the statutory financial statements to verify its completeness and accuracy.

This includes:

- alignment of POI and financial statements;
- Companies House submissions for years ended 31 December 2018, 2019, 2020; and 2021 for adverse opinions/qualifications of accounts;
- total cost to make figure for like goods;
- reconciliation of trial balance to audited financial statements.

Downwards verification: selecting and reviewing specific transactions submitted in the transaction listings to supporting documentation to verify the accuracy, existence, and relevance of the detailed transactions listing.

- A sample of raw material purchases.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

How the information was checked

Upwards verification

We carried out upward verification work to verify whether total costs to make for all goods and the like goods provided in the questionnaire responses were consistent with the published audited financial statements.

The TRA was able to confirm that the POI, 1 January 2021 – 31 December 2021, aligned with Spartan's financial year. We found no adverse auditors' reports for any of the audited annual accounts available at Companies House, i.e., for the financial years ending 31 December 2018, 2019, 2020 and 2021.

The TRA requested the trial balance, and this was reconciled with the audited financial statements for the year ended 31 December 2021. We checked the information provided and confirmed that the formulas that were populating the financial statements used the figures per the trial balance. We have a reasonable level of assurance that the information relating to upwards cost verification that Spartan party has provided us can be treated as complete.

We reconciled the cost data provided in the questionnaire response to the financial statements and did not identify any variances. We observed an extract of Spartan's trial balance during our remote verification visit and were satisfied that this agreed to the financial statements.



Using the financial statement workings for the accounts for year ended 31 December 2021, we did not identify any variances between these two sources. Following our observation of the extract of Spartan’s trial balance we were satisfied with the processes within the accounting system. We found nothing that indicated that the cost to make listing is either incomplete or inaccurate.

Downwards verification

The aim of our downward verification work was to ensure individual transactions selected from the transaction listings existed and were accurate and relevant.

The TRA:

- observed a walkthrough of the purchase and payment approval processes for raw material purchases;
- For each of the sampled transactions we;
 - traced raw materials purchase to goods received into stock;
 - checked purchase order had been raised;
 - checked that purchase traced to the supporting supplier invoice;
 - checked that invoice reconciled to the goods received notes.

The TRA selected a sample of six transactions of Spartan’s slab purchases from their questionnaire response. For each of these transactions selected we requested source documentation such as the sales order, purchase invoice, payment of funds and delivery notes for verification. Using these documents we matched the value, dates, and volume of each transaction to the information in the questionnaire, no material variances were noted.

We are satisfied that the transactional tests have been met and the raw material costs have been reasonably allocated to heavy plate. The raw material costs reported by Spartan can be considered as reasonably accurate.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Exceptions/Findings/Adjustments

The TRA has no exceptions, findings, or adjustments to report with regards to the cost figures provided by Spartan.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Conclusions

The information relating to costs that Spartan has provided us is verifiable. Based on the work we have done, we have a reasonable level of assurance that the information can be



treated as complete, relevant, and accurate and can therefore be used by the TRA for this transition review.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

D. Sales

What information was considered

Upwards verification

- Spartan’s audited financial accounts for 2021;
- Spartan’s general ledger for 2021 financial year.

Downwards verification

- Spartan’s transaction listing for domestic and export sales;
- price reductions.

The TRA selected a sample of domestic sales transactions to check the accuracy and existence of those transactions.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

How the information was checked

Upwards verification

The TRA verified the completeness of Spartan’s sales figures provided in the questionnaire response. We reconciled the headline sales figure in the audited financial accounts to the sales of all goods provided in the sales reconciliation. We were able to use the splits in the sales reconciliation between the like and other goods produced by Spartan and reconcile these against the general ledger and the transaction listings (like goods only). We did discover a £448,000 variance between the sales transaction listings for the like goods and the sales figure for the like goods within the sales reconciliation which could not be explained by Spartan, but this represented only 0.18% of total sales in the year and was therefore considered immaterial.

Except for the £448,000 variance mentioned above, the TRA was able to verify the sales figures provided in the questionnaire to the audited financial statements.

We were satisfied the sales data provided by Spartan has been appropriately reconciled to Spartan’s financial statements.

Downwards verification



The TRA selected a sample of 15 sales transactions for verification. For these 15 transactions, we requested source documents such as the sales order, sales invoice, and bank receipts.

The accuracy of the sales data was then assessed by verifying the information submitted against the source documents provided.

Whilst there were some queries raised during verification, these were all resolved satisfactorily.

The TRA reviewed Spartan’s claim that they had a small number of volume rebate agreements in place and found that during the POI there were volume rebates worth £124,000. When compared to a total turnover of £200,000,000 this is considered immaterial.

We reviewed the transaction listing, performed analytical procedures, checked source documents, and did not find any evidence of other discounts.

We were satisfied the sales transactions by Spartan were accurate.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Exceptions/Findings/Adjustments

We identified a £448,000 variance between the sales transaction listing provided in the questionnaire response and the audited financial statements which represented 0.18% of total sales. We considered this to be immaterial and therefore we will not be making any adjustments with regards to the sales figure provided by Spartan.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Conclusions

The information relating to sales that Spartan has provided us is verifiable. Based on the work we have done, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for this transition review.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions



E. Injury

What information was considered

We analysed the injury factors to give us a sense of the situation of UK industry. This will help us determine whether the UK industry is in a vulnerable state or is currently experiencing material injury. Spartan confirmed that they had not suffered injury during the POI.

Spartan's injury data provided in their questionnaire response was graphed and indexed then attached in Annex 2 as listed below:

- Turnover – Annex 2.1.
- Exports – Annex 2.2.
- Domestic sales – Annex 2.3.
- Profitability – Annex 2.4.
- Output – Annex 2.5.
- Market share – Annex 2.6.
- Stocks – Annex 2.7.
- Productivity – Annex 2.8.
- Capacity – Annex 2.9.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

How the information was checked

The TRA compared the figures provided for turnover, domestic sales, export sales and profitability with figures provided by Spartan in other annex tabs and found they were consistent. These figures come from audited accounts which give us good assurance of their accuracy.

The TRA reviewed the Annex 12 injury factors, provided in Spartan's questionnaire response, to assess the trends over this period. We did not identify any negative trends but sought to understand each factor during the verification process.

Domestic and export sales volumes

Spartan presented their data for domestic sales volume for the years of the injury period. Domestic sales volumes increased and then sharply decreased in 2020. Spartan explained this decrease was due to COVID-19 and related disruption. They then rebounded to the highest levels in the injury period in 2021.



Spartan presented their data for export sales volume for the years of the injury period. Export sales volumes decreased every year during the injury period. Spartan cited EU exit and its related uncertainties for this.

The TRA performed upwards verification on the sales values (aggregating both import and export) to the financial statements. Following this, we performed downwards verification on a sample of transactions to agree variables such as price, quantity, tonnage, and characteristics for each of these transactions. We did not find any variances between the tonnage stated on the transaction listing and the amounts on the source documents. Therefore, this gave us a reasonable level of assurance on sales volumes.

Refer to Annex 2.1 Turnover, 2.2 Exports and 2.3 Domestic sales.

Profitability

Spartan presented their data on profitability. This included total net operating profit after tax for whole company and for the like goods specifically. Also, other variables such as the interest expense incurred for the whole company and for the like goods were included.

The TRA have agreed the total expense incurred for the whole company to the audited financial statements for each year of the injury period. Similarly, the finance cost incurred for like goods was agreed to the breakdown of the total expense.

Refer to Annex 2.4 Profitability.

Output

Spartan presented their data on production volumes for the years of the injury period. Spartan produce the majority of their goods dependent on customer orders and do not produce large quantities of goods to hold as stock. Production volumes mirror the general trends of the domestic sales volumes in the injury period.

Refer to Annex 2.5 Output.

Market share

Spartan presented their data for market share for the years of the injury period. This was based on publicly available information on similar companies and therefore only their best estimate. The TRA have been unable to verify the market share estimates provided by Spartan but will use information provided by producers, as well as trade data, to calculate our own market share estimates.

Refer to Annex 2.6 Market share.

Stocks

Spartan presented its data for stock volume for the years of the injury period. Spartan stated that the values and volumes of the like good stock fluctuated over the injury period due to the goods being made to order and therefore no discernible trend is followed.



The TRA agreed the stocks at year-end total value to the audited financial statements for each year of the injury period.

Refer to Annex 2.7 Stocks.

Productivity

Spartan presented its data on productivity for the years of the injury period. The number of total employees and number of employees working on the like goods has remained consistent over the injury period. The average output in volume per employee for like goods and the median wage per employee engaged in activities for the like goods has also remained consistent over the four years.

The TRA agreed the total employee figures and those working on the like goods (titled as production employees) to the audited financial statements for each year of the injury period. This gave us a good level of assurance in the reasonableness of the figures provided.

The TRA calculated the average output in volume per employee for the like goods (production staff) and the median wage for employees concerned with the like goods using the monthly payroll summary for the POI. These matched with the figures provided in the questionnaire response for the POI. The number of total staff and the wage costs have remained consistent over the injury period and therefore, we would not expect to see a big change in median wage and average output in volume per employee for the like goods. This correlates with the figures provided in the questionnaire response and we therefore have a good level of assurance in the figures provided.

Refer to Annex 2.8 Productivity.

Capacity and capacity utilisation

Spartan presented their maximum production capacity volumes for the like goods. This is a function of the number of working hours available multiplied by a theoretical tonnes per hour figure. The amount stayed consistent over the injury period as there were no notable changes made to the production facility over the four years. Spartan explained that it was an estimate as there is variability in time taken to produce the like goods based on the specification.

The production capacity utilisation was calculated by dividing actual production of the like goods in the period over the maximum capacity figure. We checked these calculations over the injury period for accuracy and have a good level of assurance in the figures provided.

Refer to Annex 2.9 Capacity.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Exceptions/Findings/Adjustments



The TRA has no exceptions, findings, or adjustments to report with regards to the injury claims from Spartan.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

Conclusions

The information relating to injury factors that Spartan has provided us is verifiable. Based on the work we have done, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for this review.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

F. Economic Interest Test

What information was considered

- UK producers of heavy plate;
- geographical location of producers;
- structure of the supply chain;
- likely effect on consumers;
- imports, exports, and market shares.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

No redactions

How the information was checked

UK producers of heavy plate

We verified Spartan was a producer of heavy plate during the POI. The TRA were able to verify this company as a producer of heavy plate by reviewing their website and product descriptions as well as reviewing a report on the UK Steel industry produced by BEIS.

Location of sites

The TRA was able to verify the details provided for all named producers and their locations through web-based research and information from Companies House.

Structure of the supply chain



Spartan have identified the slab market as being a significant upstream industry in their production of heavy plate. They have also identified themselves as a re-roller of steel plates. This is consistent with online sources and their raw materials data. A report from BEIS amongst various online sources have stated that producers of heavy plates who use the re-roller process must buy their slabs elsewhere. Spartan have also submitted that the price of slabs heavily influences their costs of production which we have verified by reading online material. From looking at the raw materials data and from reading online sources, slab is undoubtedly a major cost in the production of heavy plate when using the re-roller process.

Spartan have estimated that half of the shipments of heavy plates to the UK are directed to stockists and Steel Service Centres (SSC). A significant proportion of the importers of heavy plate we identified using HMRC trader search had a nature of business on the Companies House website in dealing activities, service activities and wholesale trade amongst other classifications relating to market intermediaries. This verifies Spartan's submission that stockists and SSCs play a significant role in the supply chain of heavy plate. Also, using the transaction-by-transaction data a number of the downstream users were identified as either "stockist" or "stockholder" rather than just "end users". This was supported when these companies were found on Companies House. We therefore conclude that the traders/stockists play a significant role in the supply chain of heavy plate via both the importation of heavy plate and purchases of heavy plate produced in the UK.

Employment/ median wage

We were able to verify the employment numbers by comparing against the employment numbers on Companies House and we found an exact match. We were not able to verify the median wages however, using Companies House data we calculated the mean average for each of the years in the injury period. We found the mean average to be slightly higher than the median wages submitted by Spartan which is what we expected as wages in companies are generally positively skewed. The mean and median wages also followed the same trends in the injury period.

We are satisfied with the accuracy of the median wages' figures submitted by Spartan.

Market share

See Section E. Injury.

Relative significance of heavy plates to Spartan

The TRA was able to complete upwards and downwards verification of Spartan's sales as set in out in Section D.

For the POI, we reviewed the percentage of heavy plate sales volume against the sales volume of all goods (volume). To do this we used verified data on sales (as per Section D) and turnover in the POI which was verified using financial statements available on Companies House.

We are satisfied with the accuracy of the data provided by Spartan that we used to determine the relative significance of heavy plates to Spartan.



We concluded that the sales of heavy plate do represent a significant portion of total sales volume.

Exports and exports share

Spartan's initial export figures exceeded the figures reported by HMRC. Spartan indicated that this was due to intracompany trade for credit purposes where some sales were invoiced by Spartan but were shipped from another country without entering the UK. Spartan has since provided export figures which exclude intracompany trade and this is now less than HMRC's reported figures. Therefore, we are satisfied with the data Spartan has provided regarding exports and this will inform our market share calculations.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Exceptions/Findings/Adjustments

Spartan also provided statements relating to the following areas:

- consumer characteristics;
- substitute and complementary products;
- impact of the potential remedy on domestic industry (including complainant, upstream and downstream industries) and consumers;
- impact on investment projects and/or regional economic development;
- impact on competitive environment.

No evidence was provided to underpin these statements, but the TRA recognise, given Spartan's position in the market, that it is reasonable to assume that Spartan has answered from its understanding/knowledge of the market. It is also important to note that the claims made by Spartan reflect its position in favour of the measure being continued. These areas are subjective, so it is not possible to verify that they are correct. We can however compare these views against other statements and online sources to make sure we are satisfied that the views they have submitted are reliable and therefore can be included as arguments in the EIT.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):

Conclusions

The information relating to economic interest that Spartan has provided us is verifiable. Based on the work we have done, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for EIT and for any other purpose within the investigation.

If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):



Conclusion

We have obtained sufficient and appropriate evidence to conclude that the information provided by the company under all the sections above is verifiable. Therefore, we have a reasonable level of assurance that the information is complete, relevant, and accurate for the purpose of this review.



Annexes

Annex 1: Meetings

Date and duration	Type of authentication	Company representatives	TRA representatives
22 February 2022 1 hour	<input checked="" type="checkbox"/> remote <input type="checkbox"/> on-site	[redacted – contains personal information]	[redacted – contains personal information]
10 June 2022 1 hour	<input checked="" type="checkbox"/> remote <input type="checkbox"/> on-site	[redacted – contains personal information]	[redacted – contains personal information]
22 June 2022 5 hours	<input type="checkbox"/> remote <input checked="" type="checkbox"/> on-site	[redacted – contains personal information]	[redacted – contains personal information]
17 August 2022 2 hours	<input checked="" type="checkbox"/> remote <input type="checkbox"/> on-site	[redacted – contains personal information]	[redacted – contains personal information]
18 August 2022 2 hours	<input checked="" type="checkbox"/> remote <input type="checkbox"/> on-site	[redacted – contains personal information]	[redacted – contains personal information]



Annex 2: Injury assessment (updated)

Annex 2.1 Turnover

Index	<i>Turnover</i>		
	Total turnover of whole company (£)	Turnover related to like goods (£)	Turnover related to other goods (£)
2018	100	100	100
2019	88	93	70
2020	66	71	48
POI	120	121	118

Annex 2.2 Exports

Index	<i>Export sales of like goods</i>	
	Export sales by volume (tonnes)	Export sales by value (£)
2018	100	100
2019	78	77
2020	66	59
POI	59	79

Annex 2.3 Domestic sales

Index	<i>Domestic sales of like goods</i>	
	Domestic sales by volume (tonnes)	Domestic sales by value (£)
2018	100	100
2019	107	106
2020	91	80
POI	111	153



Annex 2.4 Profitability

Index	<i>Profitability</i>				
	Total net operating profit after tax (NOPAT) for whole company (£)	Net operating profit after tax (NOPAT) from like goods (£)	Average net operating profit after tax (NOPAT) margin of like goods (%)	Total interest expense incurred for whole company (£)	Finance costs (e.g., interest) incurred for like goods (GBP)
2018	100	100	-	100	100
2019	600	345	-	94	43
2020	377	213	-	54	15
POI	5,193	1,707	-	40	2

Annex 2.5 Output

Index	<i>Output</i>	
	Output by volume (tonnes)	Output by value (£)
2018	100	100
2019	99	92
2020	95	79
POI	96	124

Annex 2.6 Market share

Index	<i>Market share (%)</i>
	For like goods, the percentage of UK markets total sales that are manufactured by you
2018	100
2019	111
2020	137
POI	145



Annex 2.7 Stocks

Index	<i>Stocks</i>					
	Stocks at year end, total volume (tonnes)	Stocks at year end, total value (£)	Stocks at year end, volume manufactured by you in UK (tonnes)	Stocks at year end, total value manufactured by you in UK (£)	Stocks at year end, total volume purchased (tonnes)	Stocks at year end, total value purchased (£)
2018	100	100	100	100	100	100
2019	73	62	102	88	51	43
2020	62	51	77	68	49	37
POI	85	112	144	186	37	56

2.8 Productivity

Index	<i>Productivity</i>			
	Total number of employees (FTE)	Number of employees for like goods (FTE)	Average output in volume per employee for like goods (FTE)	Median wage for FTE engaged in activities related to the like goods (GBP)
2018	100	100	100	100
2019	101	100	99	104
2020	100	97	98	103
POI	97	96	100	110

Annex 2.9 Capacity

Index	<i>Capacity</i>	
	Production capacity for like goods (tonnes)	Production capacity utilisation for like goods (%)
2018	100	100
2019	100	99
2020	100	95
POI	100	96