



**Verification Report – 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
Date of report:	14 May 2026
Case team contact details:	ER0082@traderemedies.gov.uk
Interested party verified:	7 Steel UK

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



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Executive Summary

The Trade Remedies Authority (TRA) is conducting an expiry review into wire rod products imported into the United Kingdom (UK) from the People's Republic of China (PRC), pursuant to Regulation 70 of The Trade Remedies (Dumping & Subsidies) (EU Exit) Regulations 2019 ('the Regulations').

The purpose of this review is to consider whether injury to a UK industry in the goods would be likely to continue or recur if the application of an anti-dumping amount were to expire.

More information about the case can be found on the public files:

[Case ER0082 - public case file](#)

7 Steel UK (7 Steel), a domestic producer of the goods subject to review, returned a completed, domestic producer questionnaire ('questionnaire response').

The TRA sought to verify the completeness, relevance and accuracy of the information submitted for the purpose of the review. Below is a summary of the activities taken:

- We requested information from 7 Steel through a questionnaire and supporting evidence, which formed the basis of our verification work.
- We verified the information provided by 7 Steel against external sources, including Companies House, and through desk-based analysis of the submitted materials and a site visit.
- We reviewed the company's information and corporate associations, the product concerned, cost and sales data, before concluding with an injury likelihood assessment.
- We have identified no high-risk issues, and any small areas that required further clarification were dealt with swiftly by 7 Steel.

Based on our findings for the verification activity undertaken, the TRA have a reasonable level of assurance on the completeness, relevance and accuracy of the information provided by 7 Steel and we can use it for the purpose of this review.

Purpose of verification

The purpose of the TRA's verification activity is to determine whether the information provided by interested parties is complete, relevant, and accurate and can be used in our review. This verification report sets out the conclusions reached for each component part that covers the scope of our work. It also provides an overall conclusion stating the level of assurance reached.



The information verified may then be considered in our assessments and analysis to determine whether dumping of the goods subject to review is continuing or is likely to recur; injury has been removed, or reduced, in whole or in part due to the application of the anti-dumping amount; and the circumstances of the relevant exporting countries are such that the injury caused by the dumped goods is likely to continue or recur. This will form the basis for determining whether the application of the anti-dumping amount to the goods subject to review should be extended, or otherwise varied, and to assess whether and why we consider that the variation of the application of that amount, would meet the economic interest test of the UK.

We carried out verification activities onsite. The TRA did not seek to verify all information provided, but undertook the work considered appropriate and possible within the time constraints of the review to obtain assurance upon which to base our case decision.

This verification report documents the work completed, providing an overview of the range and scope of verification procedures performed, for each component part that covers the scope of our work, on the information submitted by 7 Steel. It details the conclusions reached regarding completeness, relevance, accuracy and provides an overall conclusion stating the level of assurance reached.

Confidential information

7 Steel must provide a non-confidential version of the verification report marked as 'non-confidential' in the header.

If any information contained in the verification report is considered confidential, 7 Steel should delete or redact those sections and provide a non-confidential summary of the information which has been removed. It must provide reasons as to why the particular information is considered confidential (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 completed by the TRA to determine whether the information provided by 7 Steel in its questionnaire response is complete, relevant, and accurate.



A. Company structure and associations

What information was considered

- Company details including date of incorporation, company addresses, etc.
- General company structure, ownership and management
- Associations with other companies
- Accounting compliance and auditor's opinion

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

How the information was checked

We checked the company structure and declared associations to gain an understating of 7 Steel's operations and corporate relationships. This process enabled us to confirm the completeness and accuracy of the information provided.

Company details

We cross-checked information submitted by 7 Steel to its audited financial statements for the period ended 31 December 2024, and to other sources including its corporate website and Companies House.

General company structure, ownership and management

We compared details provided by 7 Steel on its structure, ownership, and management with company secretarial documents submitted in the questionnaire response, as well as to publicly available information.

Associations with other companies

We reviewed the questionnaire response and did not identify any undeclared associated parties. We also discussed the nature of relationships with other corporate entities and found no inconsistencies when compared to our own independent research.

Accounting compliance and auditor's opinion

The statutory financial statements of 7 Steel are produced in accordance with the United Kingdom Generally Accepted Accounting Practice (UK GAAP). The conclusion of the auditor is that the financial statements have been presented fairly in all material respects.



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

N/A

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 company structure and associations provided by 7 Steel is verifiable. Based on the work performed, 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 dumping and injury likelihood assessments and for any other purpose within the review.

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

B. Accounting Systems and Procedures

What information was considered

- Accountancy systems and applications;
- Accounting policies;
- Significant risks; and
- Sales / customer order process and procedures.

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

How the information was checked

We conducted an on-site walk-through of 7 Steel’s accounting systems and data extraction procedures to ascertain the level of reliance that can be placed on the data processed. This included a review of the systems and controls underpinning



the sales process, as well as an end-to-end walk-through of a sampled sale transaction, following the data from order, through fulfilment and ultimately settlement.

Accounting systems

7 Steel demonstrated the use of “SAP” enterprise resource planning (ERP) software. This is used in conjunction with Microsoft Excel for further analysis of data. We were able to follow examples of the key functions and integrations.

Accounting policies, risks and financial statements

We reviewed the full audited financial statements for the reporting period ended 31 December 2024, which we confirmed were prepared in line with International Financial Reporting Standards (IFRS) and independently audited; we found no high-risk or high complexity areas which needed responding to via the design of additional verification procedures.

Sales process

We selected a random sales transaction to observe the procedural overview of sales order, fulfilment and settlement. 7 Steel demonstrated how the sales order was placed by the relevant customer, its invoice issuing process, delivery and settlement process via a walk-through of its accounting system. In addition, we requested source documentation and other evidence and explanations to underpin our understanding of the processes.

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

N/A

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

Conclusions

Based on the work performed, we have obtained a basic understanding of the relevant accounting and associated business systems of 7 Steel.

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



C. Goods

What information was considered
<ul style="list-style-type: none"> Goods description and comparability of the goods subject to review and goods concerned Commodity Code allocations Internal coding system
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i>
How the information was checked
<p>We checked the information submitted in 7 Steel’s questionnaire response to determine the accuracy of assigning commodity codes to goods subject to review, as well as to determine its submission correctly differentiated between goods within the scope of the investigation and those that were out-of-scope. We found no evidence of inaccuracies.</p> <p>Goods description, commodity code allocations and internal coding system</p> <p>7 Steel management explained how sales data is retrieved from SAP, as well as the data manipulation techniques used to map internal product codes to the commodity codes in the scope of the investigation. We reviewed the methodology and performed procedures to consider the accuracy of the translation of product attributes between source material and system data. In addition, we considered the data manipulation techniques used to adjust the system data and populate the questionnaire response; no irregularities were revealed. We also found no evidence of out-of-scope products being inadvertently included.</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>
Exceptions/Findings/Adjustments
N/A
<i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see Confidential information):</i>



Conclusions

The information relating to the company's goods provided by 7 Steel is verifiable. Based on the work performed, 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 dumping and injury likelihood assessments and for any other purpose within the review.

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

D. Sales

What information was considered

- Completeness of sales data
- Transactional testing

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

How the information was checked

Completeness of sales data

As part of pre-visit verification work, we obtained trial balance extracts from 7 Steel's management to enable us to create a POI-aligned version of the underlying accounting sales data, as well as trial balance records that aligned to the statutory accounting period. We used these extracts to reconcile data between the audited financial statements and POI-aligned questionnaire response and found a material difference.

During the in-person verification visit, we also identified that 7 Steel had used 7 Steel Group's management account to report the sales figures. The sales figures were therefore overstated as they contained sales of other entities. 7 Steel rectified and demonstrated to us how to correctly reconcile the sales data to the audited financial statements by using relevant 7 Steel's sales data in trial balances and management accounts. We were able to gain assurance of the completeness of the sales data provided.



Transaction testing

We carried out transaction testing to compare data submitted in the questionnaire response to underlying source material for the purposes of assessing the accuracy and relevance of sales transactions listed in the questionnaire response. We selected a sample of domestic sales transaction from 7 Steel’s submitted sales annexes, and 7 Steel provided documentation including invoice, delivery note, and bank payment record. No material differences were identified during our testing.

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

N/A

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 sales provided by 7 Steel is verifiable. Based on the work performed, 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 dumping and injury likelihood assessments and for any other purpose within the review.

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

E. Costs

What information was considered

- Completeness of cost data
- Transaction testing
- Cost allocation testing



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

How the information was checked

Completeness of cost data

As part of pre-visit verification work, we obtained trial balance extracts from 7 Steel to enable us to create a version of the underlying accounting cost to make and sell (CTMS) data which aligned with the POI, as well as trial balance records that aligned to the statutory accounting period. We used these extracts but were unable to reconcile data between the audited financial statements and POI-aligned questionnaire response.

During the in-person verification visit, 7 Steel demonstrated to us how to correctly reconcile the cost to make and sell data to the audited financial statements by using the relevant data in the trial balances and management accounts. The explanations and evidence provided were reasonable and we were able to gain assurance of the completeness of the cost data provided.

Cost allocation testing

7 Steel confirmed the basis of its CTMS calculation for the POI was on a pound per tonne basis. As the total cost for all products produced in the melt shop and rod and bar mill was known, the same pound per tonne figure was applied to the POI. We have reviewed this method and consider it to be reasonable.

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

N/A

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 costs provided by 7 Steel is verifiable. Based on the work performed, 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 dumping and injury likelihood assessments and for any other purpose within the review.



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

F. Injury

What information was considered

- Sales
- Cost of Sales
- Stocks
- Profit
- Market share
- Production output
- Capacity and capacity utilisation
- Employment
- Cash flow
- Return on investment

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

How the information was checked

Sales

Total sales for the injury period were reconciled to 7 Steel’s audited financial statements to confirm completeness. For the goods subject to review, sales data was traced to transaction-level detail and reconciled back to total company sales. This approach was adopted to ensure that injury assessments are based on complete and accurately classified sales data and that no material sales of the goods subject to review were omitted.

Cost of Sales

Total cost of sales for the injury period was calculated based on pound per tonne basis, and it agreed to management accounts and reconciled back to total company cost of sales. The total cost of sales also reconciled to the audited financial statements to confirm completeness.

Stock



Stock figures for the company and for the goods subject to review were agreed to 7 Steel's ledgers. We note that stock attributed to the goods subject to review includes stock that can be converted into the goods subject to review (billet) but may not be classified as goods subject to review at the point of valuation. This was considered appropriate, as such stock remains economically relevant to the production and sale of the goods subject to review and does not undermine the reliability of the injury analysis.

Profit

Profit figures were calculated using 7 Steel Group's level profit and reconciled to the audited financial statements and management accounts submitted to the bank. We checked the calculations for mathematical accuracy and internal consistency to ensure that profit indicators used in the injury assessment are reliable.

Market Share

7Steel calculated market share using its own verified sales data, and publicly available data from the International Steel Statistics Bureau. This methodology was considered reasonable given market structure and data availability, and sufficient to support an indicative assessment of market share trends over the injury period.

Production output

7 Steel used the production figures at the year-end for the production output, and the figures agreed to the SAP record. This approach was considered appropriate.

Capacity and capacity utilisation

7Steel calculated the capacity by multiplying the maximum tonnes they could produce per hour by the available hours. We have also checked the figure against desk top research and they are roughly equivalent. This approach was considered reasonable.

Employment

7 Steel presented data for its employment figures for goods subject to review and applicable median annual wage for the injury period. We reviewed their calculations and confirmed they were mathematically correct. This approach was considered appropriate.

Cash flow

Cash flow data was taken from 7 Steel Group's management accounts. 7 Steel calculated the figure using profit from the like goods, applying a turnover-based pro rata method. We considered this approach reasonable and consistent with normal accounting practice.

Return on investment

ROI was calculated using verified profit figures as a percentage of cost of fixed assets. The cost of fixed asset values was matched to 7 Steel's accountancy



system for the injury period to ensure that ROI calculations are supported by audited financial information.

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

N/A

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 injury factors provided by 7 Steel is verifiable. Based on the work performed, 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 dumping and injury likelihood assessments and for any other purpose within the review.

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

Conclusions

We assessed 7 Steel’s corporate structure and ownership, its accounting systems, and the processes used to identify the goods subject to review and to produce data for its submission. These verification activities enabled us to confirm that the information can be relied upon in the review.

Sales data was examined to ensure completeness, relevance, and accuracy, including reconciliation to audited financial statements and transaction-level testing on a sample basis. Cost data was similarly reviewed to confirm that costs attributed to the goods subject to review were consistent with 7 Steel’s accounting practices and supported by management reports and the audited financial statements. No issues were found.

Injury data was evaluated by relating it, where applicable, to accounting systems, management information, and the audited financial statements to ensure consistency and reliability. Again, no issues were found.



Overall, 7 Steel provided sufficient and appropriate evidence, which enabled us to conduct verification work on a sample basis as detailed in the above sections. Based on the work performed, we have a reasonable level of assurance that the information provided in its questionnaire response is complete, relevant, and accurate for the purpose of this review.

Annex

Annex 1: Meetings

Date and duration	Type of authentication	Company representatives	TRA representatives
21/04/2026 to 23/04/2026	<input type="checkbox"/> remote <input checked="" type="checkbox"/> on-site	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px;"></div>	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px;"></div>