



Anti-Dumping Questionnaire (Producer) Case AD0062: Tin Mill Products exported from the People's Republic of China

Period of Investigation (POI):	<input type="text" value="1 April 2023 – 31 March 2024"/>
Injury period:	<input type="text" value="1 April 2020 – 31 March 2024"/>
Deadline for response:	<input type="text" value="25 October 2024"/>
Contact details:	<input type="text" value="AD0062@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Tata Steel UK Ltd"/>

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 annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **25 October 2024**.



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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. The TRA has been established to provide the UK with its own independent trade remedies system.

This case is investigating the allegation that tin mill products from the People's Republic of China (PRC) are being dumped (exported to the United Kingdom (UK) at prices less than their normal value) and that this dumping is causing injury to the UK industry for these goods.

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 if a measure is needed. We need to establish whether the alleged dumping has occurred and has caused injury to the UK industry.

The information your company provides will help us to reach a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by **25 October 2024**. 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 specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at AD0062@traderemedies.gov.uk.



You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under the *Taxation (Cross-border Trade) Act 2018*.

Instructions on completing this questionnaire

Preparing your response

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

If you think you won't 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. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annex, and any calculations you made when developing your responses.

Please also note the following points:

- 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.
- Please complete the spreadsheet annex as requested. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. 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.
- Please provide all dates in the format DD/MM/YYYY (e.g., 23/05/2019).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods (e.g., 1 January – 31 March, 1 April – 30 June, etc).
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g., do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g., '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g., £1,300.00).
- 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 recoverable tax unless otherwise stated.
- Please refer to the case number, AD0062, in any correspondence with the TRA.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. This is so that we can publish the non-confidential version of your information on our public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

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:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- 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 only used for this investigation (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 <http://www.trade-remedies.service.gov.uk/public/case/AD0062/>.

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, R&D, distribution and/or supply of the like good and/or goods concerned.

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 visits may be conducted remotely.

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 investigation

Goods concerned

This investigation covers tin mill products exported from the PRC, described as:

“Flat-rolled products, of iron or non-alloy steel, coated or plated with tin, whether or not coated with a plastic material and/or varnished (“tinplate”) and flat-rolled products, or iron or non-alloy steel coated with chromium oxides or with chromium and chromium oxides (also called electrolytic chromium coated steel or “ECCS”).

These tin mill products are currently classifiable within the following commodity codes. These commodity codes are only given for information:

7210 11 00 10	7210 70 80 20	7212 10 10 00	7212 40 20 99
7210 11 00 90	7210 70 80 25	7212 10 90 11	7212 40 80 12
7210 12 20 10	7210 70 80 92	7212 10 90 19	7212 40 80 15
7210 12 20 90	7210 70 80 95	7212 10 90 90	7212 40 80 30
7210 12 80 10	7210 90 30 00	7212 30 00 20	7212 40 80 35
7210 12 80 90	7210 90 40 10	7212 30 00 30	7212 40 80 80
7210 50 00 10	7210 90 40 90	7212 30 00 80	7212 40 80 82
7210 50 00 90	7210 90 80 20	7212 40 20 10	7212 40 80 85
7210 70 10 15	7210 90 80 91	7212 40 20 91	7212 40 80 87
7210 70 10 91	7210 90 80 99	7212 40 20 93	7212 50 20 11
7212 50 20 19	7212 50 20 90		

In this questionnaire, these goods will be referred to as ‘**the goods concerned**’. Any reference to ‘goods concerned in this questionnaire’ refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

This questionnaire asks for information about your company’s production and sales of goods which are **like** the goods concerned. 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 PRC which are like the goods concerned 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 concerned. Instructions relating to the completion of the annexes can be found within the relevant annex.



Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

Characteristic	Description	PCN Value
Coating type	Tinplate	T
	Chromium	E
Grade	Drawn and Wall Ironed	D
	Non-Drawn and Wall Ironed	N
Guage (Thickness)	<0.180 mm	1
	≥0.180 to <0.219 mm	2
	≥0.219 to <0.299 mm	3
	≥0.299	4
Coating Weight	<4 g/m ²	1
	≥4 to <8 g/m ²	2
	≥8 to <12 g/m ²	3
	≥12 to <16 g/m ²	4
	≥16 g/m ²	5
Width	<599 mm	A
	≥599 to <899 mm	B
	≥899 to <1099 mm	C
	≥1099 mm	D
Cold Reduction	Single	S
	Double Reduced	R
Form	Coil	C
	Cut-to-length sheet	L

1. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

TSUK has added the following characteristics to the PCN structure:
 Coating type: F (for film) and N (for non-prime products). In case of non-prime products, TSUK used 'X' for all other characteristics as TSUK makes no commitment to any coating weights, quality of coating etc for such products.
 Coating weight: 6 (for Chrome).

2. Please comment on the suitability of the PCN structure regarding your product range. This may include areas such as:
 - Categorisation of features;



- Number of products included under “Other” which may exclude a fair comparison;
- Specialised products which may unduly influence the comparison.

Non-prime is the only “other” product at this point.

3. Please provide details of any manufacturing process differences which you feel may influence the PCN structure and the price comparison between the goods concerned and the like goods.

Within the range of tin mill products that are manufactured, the type of coating has one of the biggest drivers in cost, which is ultimately reflected in price. This is catered for in the PCN adequately. Within each coating type, the differences in prices are catered for by subsequent characteristic including grade of steel, dimensions and coating weight.



SECTION A: Company structure and operations

A1 Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Legal name of company:	Tata Steel UK Limited
Legal structure (e.g., limited company):	Private Limited Company
Year of establishment:	1988
Other operating names:	-
Company registration number:	02280000
Place of registration:	London
Name (point of contact):	[Personal details redacted]
Position:	[Personal details redacted]
Address:	18, Grosvenor Place, SW1X 7HS
Telephone No:	[Personal details redacted]
Email:	[Personal details redacted]
Website:	www.tatasteeleurope.com

A2 About your company

1. Describe the role of your company in the UK market for the like goods (e.g., producer, producer/exporter, producer/importer or producer/distributor).

TSUK is a major UK steel producer and the sole producer of the like goods for both the UK and export markets.

Appendix reference:

2. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.

Date	Legal form	Explanation of change
N/A		

+Add additional rows as required.



3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the like goods. These 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.

N/A
Appendix reference:

4. List all international production standards (BS / EN etc.) your company currently conforms to, for the like goods.

<p>TSUK manufactures tin mill products according to the following standards:</p> <ul style="list-style-type: none"> • BRCGS Global Standard for Packaging Materials • ISO 9001 2015 • ISO 14001 2015 • Kosher certified • EHDA Halal certified • BES6001 Responsible sourcing of products
Appendix reference:

5. State whether your company is a member of any representative organisations If so, provide a copy of the relevant documentation.

<p>TSUK is a member of UK Steel – the trade association for the UK steel industry. TSUK is also a member of two associations specific to the like goods:</p> <ul style="list-style-type: none"> • MPMA (Metal Packaging Manufacturers Association) • APEAL (Steel for Packaging Europe)
Appendix reference:

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or 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 **Annex 1 – Associated companies** for your company’s worldwide corporate structure and affiliations.



Please see additional notes in the annex for assistance on how to complete it.

2. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sales, R&D, supply and distribution of the like goods for domestic and export markets.

Please refer to TSUK's legal structure and organisational structure in Appendices.
Appendix reference: A3.2(1) & A3.2(2)

A4 Board members and principal shareholders

1. Please complete the table below for any shareholder with >5% holding in the company who also has interest in any organisation related to the production, marketing, administration, and sale of the like good in the UK or in the PRC.

Name	Shareholding in company	Name of other companies in which person holds interest	Activity of other companies
Tata Steel Europe Limited	99.9884%		Manufacturing
Tata Steel Limited	100 (indirect)		Manufacturing

+Add additional rows as required

2. Please complete the table below for any members of the Board of Directors who also has interest in any organisation related to the production, marketing, administration and sale of the like good in the UK or in the PRC.

Name	Position on Board of Directors	Name of other companies in which person holds interest	Activity of other companies
N/A			

+Add additional rows as required

A5 Operational links with other companies or persons

1. Please complete the table below if your company has established long-term agreements and/or relationships with any non-associated company/companies located in the UK, in the PRC 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.

If your company has long-term agreements and/or relationships with other companies for the supply of goods destined for internal sale, e.g., captive use, please provide the contract to demonstrate this.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix number of contract
Texturing Technology Limited PO Box 22, Texturing Technology Ltd Central Road, Tata Steel Site Margam, Port Talbot, West Glamorgan, Wales, SA13 2YJ	Joint venture of TSUK and Court Holdings Limited of Canada involved in preparation of rolls for Port Talbot, Llanwern, Trostre and Shotton.	02684488	A5.1

+Add additional rows as required

A6 Accounting practices

1. Give the address where your company's accounting records can be verified by the TRA. If records are maintained in different locations, please indicate which records are verifiable at which location.

Records address	What records are held?
[This information is confidential and not susceptible of summary]	[This information is confidential and not susceptible of summary]
[This information is confidential and not susceptible of summary]	[This information is confidential and not susceptible of summary]

+Add additional rows as required

2. Please give the financial year convention your company uses for its accounts (e.g. 1 January – 31 December). If any changes have occurred with respect to this period or in your accounting practices over the last four financial years, please describe these changes.



TSUK's accounting financial year is 1st April to 31st March. No changes have occurred during the period of the response.

Appendix reference:

3. For your company and any associated parties involved in the production, marketing or sales of your goods, please attach copies of your annual reports covering the injury period including the financial statements and audit report.

TSUK provides copies of the annual accounts applicable to the injury period starting from 1 April 2020 up to 31 March 2024 as TSUK's financial year does not correspond to calendar years used in the injury period.

TSUK does not produce a cash flow as we take an exemption not to produce one. TSUK does prepare a cash flow for another purpose but this is not exactly linked to the published accounts.

Appendix reference: A6.3(1), A6.3(2), A6.3(3), A6.3(4)

4. If your accounts are unaudited, please attach copies of your unaudited financial statements for the injury period 1 April 2020 to 31 March 2024.

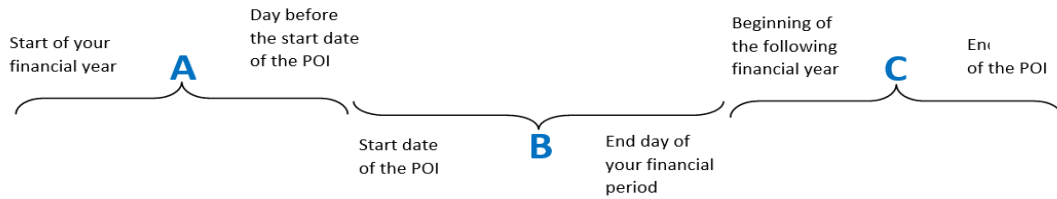
Please note that the extract is from a draft version. This is currently not signed and is subject to further change. The issues around the timings stem from the future direction of the business and the treatment of the existing assets. If the signed versions are available before verification we will share asap.

Appendix reference: A6.4

5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI, 1 April 2023 to 31 March 2024. 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:

- A.** the trial balance which starts from the beginning of your financial year and ends on 31 March 2023;
- B.** the trial balance which starts from 1 April 2023 to the end of your financial year; and
- C.** the trial balance which starts from the beginning of your following financial year and ends on 31 March 2024.



Non-confidential summary: information about TSUK’s accounting systems and tools, as well as their functionality. TSUK provided full Income Statement & Balance Sheets that reconcile to the published accounts at the lowest level of detail held]

Instead, TSUK has included full Income Statement & Balance Sheets that reconcile to the published accounts at the lowest level of detail held, and a trial balance for each business unit that is in the TSUK legal entity.

Appendix reference: A6.5

6. For your company and any associated parties involved in the production, marketing or sales of the like goods, please attach copies of relevant management reports (e.g., profit and loss statement) for the profit centre that includes the goods and like goods. Please provide these reports for the:
 - (i) POI; and
 - (ii) most recently completed financial year.

N/A

Appendix reference:

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

Please refer to the Tata Steel Europe accounts for Financial Year 2024 (from 1 April 2023 to 31 March 2024).

Appendix reference: A6.7

8. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g., costing, debtors, creditors) and other sales or production systems integrate with the general ledger. Please provide a description of how it links to the management accounting system, including any manual interventions. Please also attach:
 - your company’s chart of accounts; and
 - your company’s cost centres.



[Non-confidential summary: information about TSUK's accounting systems and tools, as well as their functionality]

Appendix reference: A6.8(1), A6.8(2)

9. Have you changed your financial policies during the injury period? If so, please explain the changes, including dates and the reasons for those changes along with the financial impact of those changes against the like goods.

There have been no changes to accounting policies, other than changes relating to adoption of new or updated accounting standards.

Appendix reference:



SECTION B: About your goods

B1 Understanding your like goods

The goods concerned in this investigation are defined in [‘the scope of this investigation’](#).

We use a PCN number to help us compare the goods concerned and the domestic like goods. When you are completing this section, you must apply the PCN system set out above to describe your goods consistently throughout your responses. If you don't use the PCN table correctly, this could limit the TRA's ability to use the information you provide.

1. Explain the internal coding system your company uses to classify your range of like goods.

Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each model where available.

Please refer to Appendix B2.2 for a description of codes and characteristics used in Annex 2 and Annex 7.

Tin Mill products are categorised in line with criteria set out in the EN standards, including gauge, width, steel quality (caption or specific customer specification grades), coating type, weight and surface finish, surface treatment, coil, sheet or manufactured form.

[Confidential – information related to TSUK's product identification process.]

Appendix reference: B2.2

2. Please complete **Annex 2 – PCN comparison**. If your company manufactures a range of like goods, list this information for each make and model in the range.

Please see additional notes in the annex for assistance on how to complete it.

3. If there are differences in characteristics within your range of like goods which cause distinguishable differences in price, explain those differences and the effect they have. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.



Three major characteristic changes cause significant difference in the cost and indeed then the price of tin mill material.

[Confidential – information related to TSUK’s pricing of products and differences in characteristics that influence price changes]

Appendix reference:

4. Indicate in the box below any physical, commercial or functional differences between your products and the goods concerned. If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

There are no major differences between UK-produced tin mill products and those imported from China.

Appendix reference:

5. Please describe all the other products (not including the goods concerned / like goods) produced or sold by your company in the UK.

TSUK produces a number of steel goods in addition to the like goods. Please see a breakdown per production facility below:

- Port Talbot: steelmaking and processing mills at Port Talbot producing hot rolled, hard iron for further process and cold rolled soft via the CAPL and Batch processes on site.
- Llanwern: finishing hot rolled steel into further products in the production chain, including hot rolled skin passed and pickled, cold rolled full hard coil and galvanising coil.
- Shotton: galvanised metallic, pre-finished (organic coated) steel and building products at Shotton in North Wales.
- Corby and Hartlepool: a wide variety of steel tubes are manufactured at Corby in the English East Midlands and Hartlepool on Teesside.

Appendix reference:

B2 Understanding the UK market

1. Please explain the end use of the goods concerned and the like goods. If there are multiple uses for the like goods, list them and, where possible, estimate what proportion of your sales goes to each.

Tin mill products are typically used for consumer and industrial packaging. They are most frequently used for food packaging – such as shallow-drawn food cans, and three-piece cans. Some customers use Drawn Walled and Iron product which is a clean steel grade for two-piece cans.



Tin mill products can be used for other food can applications, for example in can tops and bottoms, twist-off caps, screw and lug caps, snap and press-on closures, crown corks and tabs. However, products for this application are not currently manufactured in the UK.

They are also used for other purposes, such as aerosols, general line (paint/oil cans), promotional packaging such as biscuit tins, external parts for home appliances, photographic film cases, protective material for optical fibre protection or other electrical and electronic parts.

ECCS is not suitable for welding or soldering. Its appearance is considered less attractive (lower brightness) than tinplate. However, the absence of tin makes ECCS not appropriate for acidic food ($\text{pH} < 4$) due to the lower corrosion resistance. Some specific grades can be used for bakeware applications.

Appendix reference:

2. Provide a general description of the nature of competition within the overall UK market for the goods concerned and the like goods.

In the UK, TSUK is the only domestic producer of tin mill products. There is production in the EU for these products and several of the main exporting countries into the UK market are Member States of the EU. These imports do not injure TSUK as they are also selling at a fair price on a level-playing field with our company unlike imports from China, which as described in detail below, are not entering the UK market on a level-playing field with the UK producer and are therefore distorting competition in the overall market.

Appendix reference:

3. How price-sensitive is demand for the goods concerned and like good? In other words, to what extent will the overall demand for tin mill products change in response to changes in price?

As an input material for finished products, most notably in can manufacturing for food, there is significant price sensitivity. Chinese producers rely on more dynamic spot pricing compared to [Confidential – information related to TSUK’s price negotiations]. Price for tin mill products can and does influence the choice of the supplier, but does not materially impact the overall demand for such products.

Appendix reference:

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



If the same or similar quality characteristics are available from a cheaper source, price will be the main differentiator for the users of tin mill products. Other factors, such as service, lead times, development activities etc., play a secondary role.

Appendix reference:

5. To what extent is it feasible for producers to change their level of production in response to changing market conditions such as increases in prices?

If a producer has any spare capacity, not only is it feasible but commercially desirable to increase production (assuming there is demand for the output). As shown in the application for the present investigation, Chinese producers have significant spare capacity for the like goods and are able to increase production in response to higher prices and/or demand.

TSUK, on the other hand, operates its Trostre facility close to maximum capacity and is not able to increase production output further regardless of price increases.

Appendix reference:

6. Provide a general description of the trends and drivers of demand within the UK market for the goods concerned and the like goods, including causes of demand fluctuations and any factors contributing to overall market growth or decline.

As the main user of these steel products are packaging manufacturers for food, drivers of demand for the downstream food product can have a material impact on the demand for this type of steel. Indeed, a poor harvest can have a direct impact on the demand for this product as there may be fewer vegetables to can and sell in cans. Cost of living and sustainability concerns, such as food waste, also impact the demand for tinned food products.

Aerosol trends are linked more to the material price. Due to this, there is an on-going switch to the use of aluminium.

Promotional packaging is seasonal. For example, Christmas demand is forecasted to be produced April-June ready for distribution.

Appendix reference:

7. What are the major distribution and marketing channels within the UK market for the goods concerned and the like goods?

TSUK sells its products directly to the customers. [Confidential – information related to TSUK’s route to the market and particular customers]

Other suppliers (including China) sell either directly to the customers or to steel service centres and distributors who then re-sell the material to the customers.



To the best of TSUK's knowledge, traders such as Steelforce are involved in the sale and/or distribution of tin mill products in the UK.

Appendix reference:

8. Who are the general users/consumers/customers within the UK market for the goods concerned and the like goods?

Please see TSUK's response to B2.1 above.

Appendix reference:

9. Do the goods concerned and like goods compete directly with one another?

Yes, there is direct competition between the goods concerned and like goods.

Appendix reference:

10. Provide a general description of any government regulations or tax incentives affecting the production or sale of the goods concerned and the like goods.

N/A.

Appendix reference:

11. Provide a general description of developments in technology affecting the characteristics, demand or the production process of the goods concerned and the like goods.

As the metal involved in the production of tin mill products is rolled steel, important technology and investments in decarbonising the production of raw steel will be key to ensuring that the UK's production of tin mill products meet the high-level of environmental and sustainability protections present in the UK and absent in some other parts of the world. Customers are looking to downgauge steel but also keep structural integrity and design flexibility.

Appendix reference:

12. Are there any goods which could be substituted for the goods concerned and the like goods?

Tin mill products are specialty steel products which are not easily substituted for other steel goods.

Glass and plastic are the most common types of non-steel goods that can substitute tin mill products. However, given the relative lightweight, high level of recyclability,



ability to withstand heat and ease of use for food packaging of tin mill products, they are not easily substituted for other food packaging products such as glass or plastic due to their weight and inability to withstand high heat respectfully.

In some segments, such as aerosol, we are seeing an increased use of aluminium due to lightweighting.

Appendix reference:

13. Please provide a comment on any other factors which influence the market for the like goods and goods concerned (e.g., seasonality).

Seasonality affects the demand for and production of tin mill products. For example, there may be higher demand during the harvest season (e.g., from April in Europe).

Appendix reference:



SECTION C: Costs and production

C1 Cost to make and sell

1. Please complete **Annex 3 – Cost to make and sell** for the POI for your like goods sold on the domestic market. All figures should be reported net of recoverable tax.

Please see additional notes in the annex for assistance on how to complete it.

2. Describe the individual components of the costs included in **Annex 3 – Cost to make and sell** and provide detail on how these costs are paid.

We have classified the costs into the below categories.

[Non-confidential summary: detailed information about TSUK’s cost components and allocation methods]

Appendix reference:

3. If your company is vertically integrated, please provide details of how the product cost is transferred from one production process to another (e.g., at cost, internal transfer).

N/A

Appendix reference:

4. If some of the inputs (e.g., raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement, and attach documentation demonstrating any agreements you have.

[Confidential – information related to an individual supplier of input materials to TSUK]

Appendix reference: C1.4

5. If your company incurred any extraordinary costs (such as start-up or ramp up costs) during the POI, please provide details of these costs, explaining why they were extraordinary and how they have been included and amortised/depreciated in your accounts.

N/A



Appendix reference:

- 6. Please explain how you finance your production of like goods, your sources of finance, whether there is any cost of finance associated with the production of like goods, and how you have reported this in the cost to make figures and company accounts.

[Confidential – information related to TSUK’s funding and sources of finance]

Appendix reference:

- 7. Please state the cost allocation method used for each cost type listed in **Annex 3 – Cost to make and sell**, including an explanation of the allocation under each subheading and to PCNs.

[Non-confidential summary: detailed information about TSUK’s cost allocation methods]

Appendix reference:

C2 Cost reconciliation

- 1. Please complete the Cost reconciliation table in **Annex 4 – Cost reconciliation** starting from the bottom of the table and filling in only the white cells. This section will help us reconcile the cost data provided in section **Annex 3 – Cost to make and sell**.

Please see additional notes in the annex for assistance on how to complete it.

C3 Production process

- 1. Please provide a written summary and a diagram/flow chart, if available, of your production process clearly indicating the different production stages for your like goods carried out by your company.

TSUK provides a simple flow diagram in Appendix C3.1 and highlighted the flow for the like goods. Please see a description of the process below.
 For Steel Manufacturers, there are typically three distinct processing areas. A heavy end, a steel plant and rolling/finishing mills.

In the heavy end, basic raw materials, coal, coke, iron ore and limestone transformed into a homogenous material called hot metal. This is a liquid iron product that is the core ingredient into all our steel.



[Non-confidential summary: information about TSUK’s purchases of raw materials]

This liquid iron is passed to the steel plant. At this stage scrap is added and carbon driven out of the iron to make the steel. [Non-confidential summary: information about TSUK’s purchases of raw materials]. TSUK is then able to use finishes and fluxes made up of alloys and other elements to chemically change the quality of the steel. This liquid steel now starts to take on properties that will define the areas in which it can be used. Now the material is “Cast” into slabs. These slabs will vary in length and width and will, as a result, also define their usages. [Non-confidential summary: information about TSUK’s purchases of raw materials]

As the material moves into the mills, the first mill that all products go through is a hot mill. This process reheats the slab and shapes it to a width (which is partly determined by the slab width) and gauge and the weight is the remaining factor of the slab length. This product, hot rolled coil, can be sold, further processed to skin pass or pickle to be sold as hot rolled or can be sent for further processing.

All coil sales must pass through the hot mill. As a result, if TSUK decides to see more longer leg products, hot rolled sales will fall, while if there is no market for longer leg products, hot rolled sales may increase.

[Non-confidential summary: information about TSUK’s internal use of the like goods for downstream products]

Appendix reference: C3.1

2. Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. If a production process is carried out outside the UK, please explain the nature of the activity and where this process step takes place.

Starting from the raw materials (e.g., coal, coke, iron ore, etc.), all production process for the like goods take place in the UK. Value increases in line with the level of processing and the amount of materials (e.g., tin coating)/resources (e.g., energy) used to produce the final product. Please refer to our response to question C3.1 above for a detailed description of the production processes. In addition, proprietary technology of TSUK also contributes to the value added to the patented products.

Appendix reference:

3. Please provide the physical addresses (including town/city and county) of all your company’s UK sites/facilities involved in the production of the like goods.

Company name	Physical address
Port Talbot	Port Talbot, Neath Port Talbot, SA13 2NG
Trostre	Trostre Works, Llanelli, SA14 9SD
Llanwern	Llanwern Works, Newport, NP19 4QZ



Appendix reference:

+Add additional rows as required

C4 Joint products and by-products

1. Please explain any waste, scrap or by-products related to the production of the like goods. Please explain:

- how you differentiate your waste, scrap and by products;
- what you do with your waste, scrap and by-products;
- how any income or cost from waste, scrap or by-products is recorded; and
- the average waste, scrap, and by-product ratio resulting from the production process of the goods concerned and like goods.

[Confidential – information related to TSUK’s management of scrap, waste and by products]

Appendix reference:

2. Please identify any products which share a joint process with the goods concerned and/or the like goods which you produce. Please indicate at which point in the manufacturing process the products diverge.

All strip steel (and indeed the substrate for our tube mills) are made on the same assets in the heavy end during this period. They are then all rolled on the hot strip mill, from which the product routes typically diverge.

Out tin mill site has a cold rolling facility. While this looks similar to a normal strip steel cold mill, it is far more powerful, narrower and designed to make a tinplate product, so while the product step is similar, it is a different asset to the cold mills used for our galvanised, painted and annealed steels.

Appendix reference:

3. Please explain how your costs of production (per unit) differ between the like goods and its joint products, if applicable. Comment on the reason for this difference and explain your method(s) of calculation.

[Confidential – information related to TSUK’s costing solution and costs allocation]

Appendix reference:

C5 Raw material (RM) and major input purchases

1. Please complete **Annex 5.1 – Raw materials and input purchases**, detailing by transaction, purchases for cost types used in the production of the like goods



which account for more than 5% of total cost to make and sell (or if energy more than 1%), during the POI by your company.

Please see additional notes in the annex for assistance on how to complete it.

2. Please provide an invoice and any supporting documents for two of your purchases stated within **Annex 5.1 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

TSUK provides examples of invoices and supported documents for one example of coal and gas.

Appendix reference: C5.2(1), C5.2(2), C5.2(3), C5.2(4), C5.2(5)

C6 Direct labour

1. Please complete **Annex 5.2 – Direct labour costs**, detailing the monthly direct labour costs per PCN for the like goods during the POI by your company.

C7 Purchases of like goods and/or goods concerned

1. Complete **Annex 6 – Purchases of like goods and/or goods concerned**. This should include information relating to your company’s total annual purchases of the like goods and/or goods concerned over the injury period. All figures should be reported net of recoverable tax. Please list for each year every country you have purchased from in a separate row.

Please see additional notes in the annex for assistance on how to complete.

2. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of like goods and/or goods concerned.

N/A

Appendix reference:



SECTION D: Sales

D1 Domestic sales

1. Please complete **Annex 7 – Transaction by transaction (T by T) domestic sales**.

Please contact the Case Team if you can't provide the relevant information in sufficient detail.

D2 Export sales

1. Please complete **Annex 8 – Export sales**.
 - These should include all your export sales of like goods for the POI (1 April 2023 to 31 March 2024).
 - Please ensure that you report your total volume and total value for your export sales by PCN, by country of destination.
 - All figures should be reported net of recoverable tax.

Please see additional notes in the annex for assistance on how to complete it.

2. Please provide a list of overseas associated customers who purchase like goods. Explain the nature of the association and any effect it has on the terms of sale to that customer.

Our sister company in IJmuiden owns a film coating facility in Duffel, in Belgium. At this facility they take ECCS coil and apply a film coating, to create a product comparable with Protact from the Trostre line. [Confidential – information related to steel purchases of TSUK's sister company].

Appendix reference:

D3 Sales reconciliation

1. Please complete the Sales reconciliation table in **Annex 9 – Sales reconciliation** starting from the bottom of the table.
2. Additionally, please provide quantitative estimates (e.g., projections or forecasts) for the sales revenue and quantity of like goods as well as all other goods you produce on the UK market for the next five years.

D4 Distribution channels and price setting



1. If applicable, please provide copies of price lists for the like goods for 1 April 2023 to 31 March 2024.

TSUK does not have published price lists.

Appendix reference:

2. If any price reductions have been applied to any of your sales of 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).

[Confidential – information related to TSUK’s rebates and credit notes]

Appendix reference:

3. Please provide details of your distribution network for like goods if you have one.

TSUK sells like goods directly to the customers.

[Confidential – information related to TSUK’s logistics and arrangements with customers]

Appendix reference:

4. Do your sales usually include delivery in the price? If so, please explain how you calculate delivery costs and prices?

[Confidential – information related to TSUK’s pricing and price negotiations]

Appendix reference:

5. Does delivery price vary between customers? If so, then please explain what these differences may relate to.

[Confidential – information related to TSUK’s pricing and price negotiations]

Appendix reference:

6. Attach sales contracts for the top five customers by volume in **Annex 7 – T by T domestic sales** that you have sold like goods to in the period of investigation.



Please refer to the Appendices.	Appendix reference: D4.6(1), D4.6(2), D4.6(3), D4.6(4), D4.6(5), D4.6(6)
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7. Select examples of domestic sales of like goods to two different customers included in **Annex 7 – T by T domestic sales**. 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.

Please refer to the Appendices.	Appendix reference: D4-7(a), D4-7(b)
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D5 Captive use

1. Please complete **Annex 10 – Captive use**. This should include transaction-by-transaction information for 1 April 2023 to 31 March 2024 detailing your company’s individual transfers of the finished like good for internal or captive use. You will need to use the [PCN table](#) to categorise each of these transfers by PCN.

Please see additional notes in the annex for assistance on how to complete it.

2. Please comment on whether your captive use of the like goods has changed over time and what has caused any changes. Please attach evidence to support your answer where required.

N/A	Appendix reference:
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SECTION E: Injury to your company

Injury to UK industry could be caused as a result of dumped imports.
This could come in the form of:

- Material injury to UK industry;
- Threat of material injury to UK industry; or
- Material retardation of the establishment of such an industry.

1. Is your company suffering from injury? If so, please describe the nature and degree of the injury. This can relate to the prices, volumes or profits associated with your production and sale of the like goods, or to wider aspects of your business. Please specify and substantiate your claims with evidence.

Please refer to TSUK's application.

Appendix reference:

2. Please estimate the date when the injury began to affect your company. Explain how it has developed since this date.

Please refer to TSUK's application.

Appendix reference:

3. Please provide details if your cost of production of the like goods has changed significantly during the injury period. If so, please explain the cause(s) and, where possible, substantiate with evidence.

[Confidential – information related to TSUK's costs during the injury period]

Appendix reference:

4. Please complete **Annex 11 – Injury**. This should be completed in reference to your UK production of the like goods for the 1 April 2020 – 31 March 2024.

5. Please explain how you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods.

TSUK is not able to provide the finance costs incurred for like goods, as we only produce financial accounts at the Tata Steel UK Limited level.



TSUK has attempted to provide net operating profits before interest and tax as a proxy, as these numbers are available more readily, whereas any tax and financing costs are simply an arbitrary division of cost over sales tonnes.

[Non-confidential summary: description of the approach taken by TSUK to provide net operating profits before interest and tax]

Appendix reference:

6. Please explain how you calculated and apportioned your finance costs (e.g., interest) incurred for the like goods.

TSUK is not able to provide the finance costs incurred for like goods, as we only produce financial accounts at the Tata Steel UK Limited level.

Appendix reference:

7. Please explain how you assess your stock levels. Indicate if your stock levels were abnormally high during the injury period. If so, provide an explanation.

[Confidential – information related to TSUK’s stock assessment]

Appendix reference:

8. Please explain how you estimated your percentage of market share for the like goods.

Market share is estimated based on TSUK’s sales to the domestic market (as TSUK is the only producer of the like goods in the UK) and imports from third countries.

Appendix reference:

9. Please explain how you calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations.

[Non-confidential summary: information about TSUK’s methodology of calculating production capacity and capacity utilisation]

Appendix reference:

10. Please explain how you set your wages, and the causes of any significant variations.

[CONFIDENTIAL – sensitive information related to salary negotiations and TSUK’s calculation of the number of employees for the like goods]

Appendix reference:



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

[Confidential – information related to TSUK’s manning allocation]

Appendix reference:

12. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure.

We would expect a return of c. 9%, which is based on history. [Confidential – information related to the impact of price negotiations on profitability]

Appendix reference:

13. Explain how you set your current sales price for your like goods. Is this the same as your target sales price? If not, please explain the reasons for this.

[Confidential – information related to TSUK’s price setting and factors influencing it]

Appendix reference:

14. Explain any variances between your actual and forecasted budgets over the injury period, with reference to your cash flow statements. Would your forecasted budgets be affected if measures on the goods concerned were not applied? Please describe the nature of any change and substantiate your claims with evidence.

N/A

Appendix reference:

15. Complete **Annex 12 – Investments and Return on Investments**.

16. Please provide details of your typical source(s) of finance (e.g. loans, debt, share issues, bond issues etc.) for each category of investment relating to your company-wide investments.

[Confidential – information related to TSUK’s funding and sources of finance]

Appendix reference:

17. Please describe any changes in your company’s level and trends of returns on investment over the injury period. Please explain the nature and cause of this change and substantiate with supporting evidence e.g. funding proposals, loan approvals or other relevant financial documents.



[Non-confidential summary: the level of investments varied over the injury period. Importantly, TSUK demonstrated a constant increase in social/health & safety investments, reflecting Tata's strong commitment to health and safety.]

Appendix reference:

18. Please complete **Annex 13 – Forward sales contracts**.

Describe and attach copies of all forward sales contracts/ongoing supply agreements for like goods. Comment on these forward sales contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation?

[Non-confidential summary: information about TSUK's sales strategy and negotiations process]

Appendix reference:

19. If your company is suffering from injury, please explain and indicate the degree to which this has been caused by the alleged dumping of the goods concerned. Please also explain and indicate the degree to which any other factors might have caused the injury, for example:

- 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; and
- export performance and the productivity of the UK.

Please substantiate your claim(s) with evidence.

TSUK is suffering material injury as a result of dumped imports of tin mill products from China. Our company has lost production, sales, and market share. Our profitability was healthy in 2022 but dropped in the POI. The increase in profitability in 2022 was due to the supply-demand market imbalance caused by COVID and the temporary drop in imports from China during 2021. This healthy market situation is however now over, and things have quickly turned for the worse. Profits quickly disappeared under pressure from low-priced imports from China, which were diverted to the UK market notably due to the U.S. opening anti-dumping and countervailing investigations (see APPENDIX G.1 of TSUK's Application). The UK industry lost a lot of volume as customers switched due to low priced Chinese



imports over the course of 2022. Many contracts have prices set on an annual basis, so the first impact of low priced imports (sold on a spot or shorter contract duration basis) is on volumes. That was seen in 2022 when UK purchasers switched to Chinese imports. Subsequently, low priced imports affect the annual price negotiations for the next year – which is seen in the profit decline in 2023. That is why injury was first seen in volumes in 2022 and then in profits in 2023. Low-priced imports from China undercut and undersold the UK producer by large amounts (especially towards the end of the POI) and injured TSUK despite its best efforts to stay competitive.

Moreover, prices rose but they merely followed the rising unit costs (due to the cost-price squeeze driven by pressure from imports), which was the reason for the low profitability. Given that most customers negotiate prices on an annual basis, the injury is most apparent in lost volumes: when Chinese prices are cheaper, the customer simply buy more Chinese imports – hence the massive loss in market share. TSUK is struggling to avoid further negative consequences – especially as things tend to get even worse in more recent periods. The industry's injury is caused by the unfairly low-priced imports from China that continue to grow quickly taking up more market share at prices that are unsustainable in a fair market situation (see ANNEX 2 of TSUK's Application).

Appendix reference:

20. Is your company under threat of injury? If so, please describe the threat, its cause and how the injury is clearly foreseen and imminent.

TSUK is already suffering injury – please see our response to the previous question.

Appendix reference:

21. Would there be any indirect effects on your industry and/or business if trade remedies are imposed on the goods concerned? In your answer, please also comment on the effect of no measures.

TSUK does not anticipate any indirect effects on our industry and other businesses if the measures are imposed.

If the present investigation does not result in anti-dumping measures, low-priced dumped imports from China will continue to exercise severe pressure on the UK industry and undermine its performance. In these circumstances, TSUK may not be able to maintain production and may be forced to reassess the viability of its tin mill business.

Appendix reference:



Trade Remedies
Authority

Trade Remedies Authority
 Confidential Non-Confidential



SECTION F: Dumping

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the respective text box.

F1 Dumping

1. Do you have any information about the normal value of the goods concerned in the PRC? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, or any other documentation relating to the domestic price of the goods concerned in the PRC.

Please refer to the detailed information provided by TSUK in the Application.

Appendix reference:

2. Do you have any information about the export price to the UK of the goods concerned from the PRC? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation relating to the export price to the UK of the goods concerned from the PRC.

Please refer to the detailed information provided by TSUK in the Application.

Appendix reference:

F2 Adjustments

1. If you are aware of any factors that could mean costs or profits of the goods concerned are not substantially determined by market forces, please provide details and any supporting evidence.

Please refer to the detailed information provided by TSUK in the Application.

Appendix reference:

F3 Particular market situation

The TRA has received an allegation that a Particular Market Situation (PMS) exists in the domestic Tin Mill market in the PRC. The TRA has yet to make a



determination in relation to the allegation. However, where it is determined that a PMS exists and the effect of the PMS on the domestic sales price prevents a proper comparison between that and the export price, we would not consider the comparable price appropriate to use for the purpose of determining normal value.

In such circumstances, the TRA may determine the normal value by determining the costs of production plus a reasonable amount for administrative, selling, and general costs and for profits. Adjustments may then be made to these figures using data from an appropriate, representative third country.

1. If you have any concerns or information about the possible existence of a particular market situation in the exporting country or territory, and specific details of distortions, please provide details below.

Please refer to the detailed information provided by TSUK in the Application.

Appendix reference:

2. In the event that the TRA needs to make such adjustments, are you able to suggest an appropriate third country from which suitable cost and profit data can be obtained?

Please refer to the detailed information provided by TSUK in the Application.

Appendix reference:

3. If adjustments to normal value are found to be necessary, the TRA may look to use data from a producer in the representative third country. If you have contact details of a producer in that country who may be willing to participate, please provide them below.

Please refer to the detailed information provided by TSUK in the Application.

Appendix reference:



SECTION G: Economic Interest Test

The Economic Interest Test helps the TRA assess the economic impact of a measure compared to what would happen if it the measure was not in place. There are six factors which the TRA must consider as part of the Economic Interest Test:

- i) The injury caused by the importation of the dumped goods to UK industry and the benefits to that industry in removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that the TRA considers relevant.

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company’s UK sites/facilities, where relevant and possible.

G1 Background

1. Please provide the names, legal addresses and telephone numbers of the following domestic companies:
 - Those that produce tin mill products in the UK;
 - Those that are involved in the importation, distribution, or sale of tin mill products from third countries.

TSUK is the only producer of tin mill products in the UK.

To the best of TSUK’s knowledge, traders such as Steelforce are involved in the sale and/or distribution of tin mill products in the UK.

Appendix reference:

2. Please provide an overview of your upstream supply chain for tin mill products (e.g., producers of raw materials). Where possible, please describe the number, location and size of UK producers at each stage.

TSUK itself is an upstream producer of the main inputs for the like goods, i.e. cold-rolled and annealed steel (known as ‘black plate’). TSUK produces hot-rolled steel in Port Talbot, which is then cold-reduced in Trostre to meet the specific requirements of a tin mill product. These two sites cumulatively employ thousands of people.



Other significant input materials consist mainly of tin and chrome. TSUK purchases these inputs from unrelated companies in the UK, the EU and other countries.

Appendix reference:

- 3. Please provide an overview of your downstream supply chain. Please indicate who the consumers of tin mill products are, which industry and level of trade they relate to and whether they are companies or private individuals.

Please refer to TSUK’s response to question B2.1 above. The main consumers (users) of tin mill products are can and aerosol manufacturers. These are large (often – international) companies that buy tin mill products in large volume directly from the producers.

Appendix reference:

G2 Your company

- 4. Please complete **Annex E1 – Economic Interest Test**, providing employment figures in full-time equivalents (FTE) for each of your company’s UK sites or facilities.
- 5. How would these employment figures be affected if an anti-dumping measure was imposed? Please support your claims with evidence.

If anti-dumping measures are imposed, TSUK will be better positioned to maintain its employment level at Trostre. Importantly, if TSUK’s tin mill business is not injured by dumped imports from China, it will contribute to preserving employment at TSUK’s upstream facilities (such as Port Talbot) that provide substrate for Trostre.

Appendix reference:

- 6. How would your domestic sales of tin mill products be affected if an anti-dumping measure was imposed? Please support your claims with evidence.

TSUK expects that it will be able to maintain domestic sales of tin mill products at a similar level if an anti-dumping measure was imposed. Such sales would also become more sustainable from the pricing perspective as currently dumped Chinese imports are driving UK prices down with a direct negative impact on TSUK’s prices.

Appendix reference:

- 7. How significant is the production of tin mill products relative to your company's entire UK production?

Like goods constitute an integral part of TSUK’s production footprint and account for more than [confidential] of our total production output.

Appendix reference:



G3 Potential impacts of a measure

8. Please describe how you would expect an increase in the import prices of tin mill products to affect each of the following. Where possible, please support your claims with evidence.

- Domestic prices of tin mill products in the UK;

Domestic prices of tin mill products in the UK are likely to stabilise and start to reflect the actual supply/demand dynamic as they won't be artificially suppressed by dumped Chinese imports.
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Appendix reference:

- Total UK production of tin mill products;

Total UK production is likely to remain stable as TSUK would be able to recover costs and achieve sustainable prices.

Appendix reference:

- Total imports of tin mill products from the PRC and other third countries to the UK; and

Imports from third countries may increase if Chinese suppliers start to sell at non-dumped prices as the UK market will become more highly priced and therefore more attractive. It is unclear if Chinese imports will be able to remain competitive at non-dumped prices.
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Appendix reference:

- Total exports of tin mill products from the UK.

Total exports are likely to remain stable as TSUK will be able to sell at sustainable prices domestically and will not be pushed out of our domestic market by low-priced, dumped imports from China.

Appendix reference:

9. Do you know of any related industries that would be affected if an anti-dumping measure was imposed?

Please consider in particular:

- Upstream industries – those who produce inputs (such as raw materials) needed for the production of tin mill products;



Imposition of the anti-dumping measure will have a positive impact on the upstream industries. First, as explained above, TSUK itself is the main supplier of inputs (substrate) for the production of tin mill products. If

Appendix reference:

- Downstream industries – those who purchase tin mill products;

TSUK does not expect an anti-dumping measure to have any impact on the downstream industries.

Appendix reference:

- Industries for complimentary goods – those which would typically be bought alongside tin mill products (such as ink being bought with printers); and

TSUK does not expect an anti-dumping measure to have any impact on the industries for complimentary goods.

Appendix reference:

- Industries for substitute goods – those which might be bought instead of tin mill products (such as margarine instead of butter).

TSUK does not expect an anti-dumping measure to have any impact on the industries for substitute goods.

Appendix reference:

10. To what extent would you expect any changes in prices of tin mill products to be passed onto final consumers?

Tin mill products account for an insignificant share (less than 5%-15%) of the cost of finished goods, such as canned foods, aerosols, etc. Changes in prices of tin mill products are highly unlikely to be passed onto final consumers.

Appendix reference:

11. Would your plans for investment or expansion in the UK over the next five years be affected if an anti-dumping measure was imposed? Please support your claims with evidence.

TSUK has started a major investment project planned for the next 4-5 years, replacing the blast furnaces and traditional steel making processes with Electric Arc Furnace technology, which is supported by the UK government.

This investment is designed around a c. 3mt run rate, or which Trostre would account for around [confidential]. If measures were not in place and the future of Trostre were at risk, the whole investment strategy may need to be revisited, as underloading an asset to that extent (and the associated lack of loading on a 24:7



Hot Mill) may make the plan unviable, which in turn could result in a smaller arc furnace being built, which could see reductions to other downstream sites to meet the output of a smaller furnace, or a worst case scenario that the whole investment is put into question by not being able to cover the overheads on such a lower volume throughput.

Appendix reference:

12. As a public body, the TRA has an obligation under the Equality Act 2010 to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty 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 the imposition of an anti-dumping measure might disproportionately affect any of these groups or any other particular group.

N/A

Appendix reference:

13. How would the number or range of suppliers in the tin mill products market be affected if an anti-dumping measure was imposed? Please provide an explanation.

The number or range of suppliers of tin mill products in the UK would not change significantly if an anti-dumping measure is imposed. Even if Chinese producers cease their exports to the UK as a result of the measure, the UK market is supplied from by a number of third country producers (such as France, the Netherlands, Germany, Taiwan, South Korea, etc.). Moreover, the domestic UK market has always been and remains a priority for TSUK's sales.

Appendix reference:

14. How would the suppliers' ability to differentiate their products by price, quality, service or innovation in the tin mill products market be affected if an anti-dumping measure was imposed? Please provide an explanation.

TSUK does not anticipate any negative impact on the suppliers' ability to differentiate their products. It is possible in the absence of low-priced, dumped



imports from China, other suppliers will be able to compete and focus on quality, service and innovation rather than only price.

Appendix reference:

15. How would the cost of switching between suppliers in the tin mill products market be affected if an anti-dumping measure was imposed? Please provide an explanation.

TSUK does not anticipate any impact on switching between suppliers.

Appendix reference:

16. How would the suppliers' ability to set agreed prices between themselves or for certain consumers or products be affected if an anti-dumping measure was imposed? Please provide an explanation.

Imposition of the measures cannot lead to a risk of setting agreed prices between suppliers. TSUK strictly complies with UK competition rules and would not engage in this type of behaviour under any circumstances due to numerous compliance concerns. Moreover, while TSUK cannot guarantee that other suppliers (e.g. exporting producers from third countries) do not set agreed prices, it seems highly unlikely given the nature of competition in the steel market.

Appendix reference:

17. How would the choices of tin mill products available to consumers be affected if an anti-dumping measure was imposed? Please provide an explanation.

Please see TSUK's response to question G3.13 above.

Appendix reference:

18. How would the ability of downstream businesses or consumers to make informed decisions be affected if an anti-dumping measure was imposed? Please provide an explanation.

Imposition of the measures will not have any negative impact on the ability of consumers to make informed decisions

Appendix reference:

19. Are there any additional economic factors that you consider to be relevant for the Economic Interest Test in this investigation?

TSUK notes that in addition to our employees, we also support a high number of contractors both directly and through our supply chains. While not all of these contractors are directly related to the like goods, given the importance of tin mill products for the long-term sustainability of our downstream businesses and the



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company generally, imposition of the measures is in the interest our contractors as well.

Appendix reference:



SECTION H: Checklist and appendices

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

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	✓
Section B – About your goods	✓
Section C – Costs and production	✓
Section D - Sales	✓
Section E – Injury to your company	✓
Section F – Dumping	✓
Section G – Supplementary questions	✓

+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
A3.2(1)	A3.2(1)
A3.2(2)	A3.2(2)
A5.1	A5.1
A6.3(1)	A6.3(1)
A6.3(2)	A6.3(2)
A6.3(3)	A6.3(3)
A6.3(4)	A6.3(4)
A6.4	A6.4
A6.5	A6.5
A6.7	A6.7
A6.8(1)	A6.8(1)
A6.8(2)	A6.8(2)
B2.2	B2.2
C1.4	C1.4
C5.1(1)	C5.1(1)



C5.1(2)	C5.1(2)
C5.1(3)	C5.1(3)
C5.1(4)	C5.1(4)
C5.1(5)	C5.1(5)
C5.1(6)	C5.1(6)
C5.1(7)	C5.1(7)
C5.1(8)	C5.1(8)
C5.1(9)	C5.1(9)
C5.1(10)	C5.1(10)
C5.1(11)	C5.1(11)
C5.1(12)	C5.1(12)
C5.2(1)	C5.2(1)
C5.2(2)	C5.2(2)
C5.2(3)	C5.2(3)
C5.2(4)	C5.2(4)
C5.2(5)	C5.2(5)
D4.7(a)	D4.7(a)
D4.7(b)	D4.7(b)
D4.6(1)	D4.6(1)
D4.6(2)	D4.6(2)
D4.6(3)	D4.6(3)
D4.6(4)	D4.6(4)
D4.6(5)	D4.6(5)
D4.6(6)	D4.6(6)

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