



Safeguard Questionnaire (Downstream Industries)

Extension Review

Case SE0041: Safeguard Measure on Certain Steel Products

Period of Investigation (POI):	<input type="text" value="01 April 2018 – 31 March 2023"/>
Deadline for response:	<input type="text" value="22 October 2023"/>
Contact details:	<input type="text" value="SE0041@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Anonymous"/>

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

Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of the questionnaire, 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 **22 October 2023**.



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.

As part of our work, we are carrying out an extension review of the safeguard measure relating to certain steel products.

This extension review will consider whether the expiry of the definitive safeguarding remedy would likely result in a continuation or a recurrence of serious injury to UK producers of the relevant goods.

Products under investigation

The products under this extension review (“products under investigation”) are:

Table 1: Products under the extension review		
Product Number	Product Category	Commodity Codes
1	Non-alloy and other alloy hot-rolled sheet and strip	72081000, 72082500, 72082600, 72082700, 72083600, 72083700, 72083800, 72083900, 72084000, 72085210, 72085299, 72085310, 72085390, 72085400, 72111300, 72111400, 72111900, 72126000, 72251910, 72253010, 72253030, 72253090, 72254015, 72254090, 72261910, 72269120, 72269191, 72269199
2	Non-alloy and other alloy cold-rolled sheet	72091500, 72091690, 72091790, 72091891, 72092500, 72092690, 72092790, 72092890, 72099020, 72099080, 72112320, 72112330, 72112380, 72112900, 72119020, 72119080, 72255020, 72255080, 72262000, 72269200
4	Metallic coated sheet	72102000, 72104100, 72104900, 72106100, 7210690020, 7210690080, 72109080, 72122000, 72123000, 72125020, 72125030, 72125040, 72125061, 72125069, 72125090, 72259100, 72259200, 72259900, 72269910, 72269930, 72269970
5	Organic coated sheet	72107080, 72124080
6	Tin mill products	72091899, 72105000, 72121090, 72101100, 72107010, 72124020, 72101220, 72109040, 72101280, 72121010
7	Non-alloy and other alloy quarto plates	72085120, 72089020, 72254040, 72085191, 72089080, 72254060, 72085198, 72109030, 72085291, 72254012
12A	Alloy merchant bars and light sections	72283020, 72283041, 72283061, 72283069, 72283070, 72283089, 72286020, 72287010
12B	Non-alloy merchant bars and light sections	72143000, 72149110, 72149190, 72149931, 72149939, 72149950, 72149971, 72149979, 72149995, 72159000, 72161000, 72162100, 72162200, 72164010, 72164090, 72165010, 72165091, 72165099, 72169900
13	Rebar	72142000, 72149910
16	Non-alloy and other alloy wire rod	72131000, 72139149, 72271000, 72132000, 72139170, 72272000, 72139110, 72139190, 72279010, 72139120, 72139910, 72279050, 72139141, 72139990, 72279095



17	Angles, shapes, and sections of iron or non-alloy steel	72163110, 72163219, 72163310, 72163190, 72163291, 72163390, 72163211, 72163299
19	Railway material	73021022, 73021028, 73021050
20	Gas pipe	73063041, 73063049, 73063072, 73063077
21	Hollow section	73066110, 73066192, 73066199
25A	Large welded tube (1)	73051100, 73051200
25B	Large welded tube (2)	73051900, 73052000, 73053100, 73053900, 73059000
26	Other welded tube	73061100, 73061900, 73062100, 73062900, 73063012, 73063018, 73063080, 73064020, 73064080, 73065021, 73065029, 73065080, 73066910, 73066990, 73069000

Any reference to the products under investigation refers to the product categories and commodity codes covered in the table above.

Further information regarding the investigation can be found on the public file: <https://www.trade-remedies.service.gov.uk/public/case/SE0041/>

Why should I take part?

Your responses will inform our review into whether the current safeguard measure should be extended or expire.

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

How to answer the questions

Please read and follow all the instructions carefully. You 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.

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 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 before tax unless otherwise stated.
- Please refer to the case number, SE0041, in any correspondence with the TRA.

Preparing confidential and non-confidential versions

Please note that you will need to provide both confidential and a non-confidential version of the questionnaire. This is so that we can publish the non-confidential version of your information on our public file. This enables parties involved in a case to view and understand the evidence being considered and would give them an opportunity to defend their own interests.

Where you consider information to be confidential, please provide a non-confidential summary of the information or, where that is not possible, a statement explaining why the information should be treated as confidential, and why it cannot be summarised. See our guidance on [how we handle confidential information](#) for details of how to prepare your non-confidential version.

Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header and submit both versions through the [Trade Remedies Service](#) by **22 October 2023**. Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.

If you have any questions or difficulties in completing the questionnaire, please contact the case team at SE0041@traderemedies.gov.uk.

Many thanks for your cooperation.



Where possible, please specify your answers by relevant product categories.

Information about your company

1. Please provide some information about the products sold by your company, including:
 - o any product(s) that your company produces/sells using the products under investigation;
 - o finished products that are made using the products under investigation; and
 - o customers of these products.

Note: finished products are those purchased by end users and customers.

We produce the finished product ironing boards using the product under investigation product 2 "non-alloy and other alloy cold-rolled sheet product", identified by the specific commodity codes 72112330 and 72091500. We purchase the product under investigation as slit coil and as steel blanks, these materials are then converted by the business during the production of ironing boards.

The produced ironing boards are sold by the company to retailers in the UK and the rest of the world who then sell them to end users, typically as part of a range of complementary products such as replacement ironing board covers and other laundry accessories. The company also sells ironing boards directly to end users via various online platforms.

Appendix reference:

2. Please provide the quantity and value of purchases in the last financial year of those products listed in table 1, either imported or domestically sourced. **Please specify your answers by relevant product categories.**

Financial Year (04/22 to 03/23)	
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Product Category	Quantity (please include units)	Value (£)	Imported or domestically produced?
Non-alloy and other alloy cold-rolled sheet	Commercially sensitive data: Range 1.8 to 2.1 million (kg)	Commercially sensitive data: Range 1.7m to 2.0m	Imported but slit in the UK
Non-alloy and other alloy cold-rolled sheet	Commercially sensitive data: Range 400,000 to 520,000 (each)	Commercially sensitive data, range: 250,000 to 300,000	A mixture of imported and domestically produced

insert additional rows for each site

3. Please provide the number of employees for each of your company's 10 largest UK sites (by number of employees).

Site Address	Number of Employees (FTE)	Is this site linked to the production, sales, or supply of any product(s) that use the products under investigation? Y/N
Commercially sensitive Site A	Commercially sensitive data: Range 80 to 95	Y



Commercially sensitive Site B	Commercially sensitive data: Range 45 to 55	Y
Commercially sensitive Site C	Commercially sensitive data: Range 75 to 85	Y
Commercially sensitive Site D	Commercially sensitive data: Range 35 to 40	Y
Commercially sensitive Site E	Commercially sensitive data: Range 5 to 10	Y

insert additional rows for each site

Information relating to sales

4. Please provide the quantity and value of sales in the last financial year for those products listed in question 1 which use or incorporate the products under investigation.

Financial Year (04/22 to 03/23)	
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Product name	Quantity (please include units)	Value of sales (£)	Which product category does it use?
Ironing board	Commercially sensitive data: Range 400,000 to 475,000 (each)	Commercially sensitive data redacted.	Non-alloy and other alloy cold-rolled sheet

insert additional rows for each product that your company manufactures/sells

5. Please provide your company's total sales revenue for the last financial year.

We want to get a sense of the importance of the products under investigation relative to the sales of your company as a whole.

Financial Year (04/22 to 03/23)	
£43,395,900	



Information relating to costs

In this section, we want to get a sense of the importance of the products under investigation relative to the total cost of the product(s) that your company manufactures/sells.

6. Please provide the cost of raw material in the last financial year for those products listed in question 4 which use or incorporate the products under investigation. Please complete the table below.

Financial Year (04/22 to 03/23)	
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Product name	Costs of product under investigation (£)	Total cost of other raw materials (£)
Ironing board	Commercially sensitive (indexed) 55	Commercially sensitive (indexed) 45

insert additional rows for each product that your company manufactures/sells

7. Please provide the labour, indirect and total cost in the last financial year for those products which use or incorporate the product under investigation. Please complete the table below.

Financial Year (04/22 to 03/23)	
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Product name	Labour Costs (£)	Indirect/overhead costs (£)	Full manufacturing cost (£)	Quantity produced (please include units)
Ironing boards	Indexed 20	Indexed 25	Indexed 100	Range: 400,000 to 475,000 each

insert additional rows for each product that your company manufactures/sells

Other questions

8. How price-sensitive is demand for products that use or the products under investigation? In other words, to what extent will sales fall if you raise prices? Please provide any relevant information.

Ironing boards in general are quite price-sensitive, where large pricing gaps emerge for similar specification ironing boards, the market is highly price-sensitive.

Sales will fall if we raise prices. We face significant pricing pressure from competitors importing products who do not face the same quotas/duties relating to steel costs. Our steel costs may be increased because of quota related duties, but the same duties do not apply to the import of ironing boards which have potentially been produced with the same steel. We are also aware that some overseas ironing board manufacturers import steel from Russia at significantly lower costs. They operate in free trade zones with reduced or eliminated customs duties, tariffs, and various trade barriers.



The 2022 ironing board anti-subsidy investigation (AS0020) final determination identifies the injury caused by low price products.

Appendix reference:

9. Please comment on how total UK imports of the products under investigation have developed during the POI (01 April 2018 – 31 March 2023).

We don't have any information regarding UK imports of the product under investigation to be able to answer this question.

Appendix reference:

10. Please submit any available information concerning global export capacities, both currently, and for the foreseeable future. Please substantiate any claims with evidence, where possible.

N/A

Appendix reference:

11. Please comment on the likelihood of trade diversion to the UK if the existing safeguard measure were to be removed. What impact, if any, would you expect trade measures, safeguards measures or other forms of trade control in third-country markets (e.g. the US Section 232 measures and the EU safeguard measure) to have on the UK market?

Please substantiate any claims of likelihood with evidence.

N/A

Appendix reference:

12. Please comment on the likelihood of the recurrence of an increase in imports of the products under investigation if the existing safeguard measure were:

- i) extended; or
- ii) expired.

Please substantiate with evidence.

N/A

Appendix reference:

13. Please tell us how your company and industry would be affected if the existing safeguard measure expired.

Expiry of the existing safeguard would potentially reduce the cost of products under investigation that we use to produce ironing boards. In turn this may reduce our costs and allow us to compete with importers who do not encounter the same safeguards on products under investigation once converted into ironing boards which are not covered by the safeguard measures.

Appendix reference:



14. Do you have any comment to make on the current rate of liberalisation of the safeguard measure? Do you think it should be varied? If so, please describe why and how.

We don't have any comment to make on the liberalisation, but we would like the safeguard review to carefully consider the impact on UK manufacturers using products under investigation who are competing with overseas manufacturers who do not encounter the same safeguards and some of which operate within free trade zones. This results in overseas exporters have a pricing advantage which disadvantages UK manufacturing. If this is allowed to continue it's possible that we would have to review the competitiveness of manufacturing in the UK and potentially consider closing the site. The sale of ironing boards is closely linked to the sales of replacement covers and other laundry accessories. If ironing board pricing isn't competitive, we're likely to lose sales in these related areas, as retail buyers often select a range of products.

Appendix reference:

15. Is there any other information you would like to provide to help us assess the likely effect of a safeguard measure on the overall economic interest of the UK?

No

Appendix reference: