



**Pre-Sampling Questionnaire (Producer)**  
**Transition review of anti-dumping measures**  
**Case TD0054: Certain Organic Coated Steel**  
**products originating in the People's Republic of**  
**China**

Period of Investigation:	01 April 2023 – 31 March 2024
Injury Period:	01 April 2020 – 31 March 2024
Deadline for response:	30 April 2024
Case team contact:	<a href="mailto:TD0054@traderemedies.gov.uk">TD0054@traderemedies.gov.uk</a>
Completed on behalf of:	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 and in the header. We strongly recommend this questionnaire to be completed electronically.

Confidential

Non-confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by **30 April 2024**.



## Table of contents

Instructions .....	2
Who should complete this form? .....	3
Why you are being asked to complete this pre-sampling questionnaire?.....	3
Deadline for response .....	4
The scope of this transition review.....	4
Goods subject to review .....	4
Like goods.....	5
Recalculation in transition reviews .....	5
Section A – Activities of your company and any associated parties .....	5
A1 – Your company’s activities .....	5
A2 – Associated parties and operational links.....	6
A3 – Your position in respect of this transition review .....	7
Section B – Production, sales and imports .....	7
B1 – Production.....	7
B2 – Sales volume and value.....	8
B3 – Imports and Sales.....	8
Section C – Additional information.....	9
C1 – Market prices in the PRC domestic & exporters market, and price comparison to the UK market.....	9
C2 – Scope .....	10
C3 – Product Control Numbers .....	11
C4 – Other interested parties .....	12
C5 – Economic Interest Test.....	12
C6 – Anything else .....	13

## Instructions



The Trade Remedies Authority (TRA) will be carrying out a transition review of the EU trade remedy measure which will consider whether the dumping of certain organic coated steel products from the People's Republic of China (PRC) would be likely to continue or recur if the anti-dumping duty were no longer applied to those goods, and injury to the UK industry in the like goods would be likely to continue or recur if the anti-dumping duty were no longer applied to those goods.

## Who should complete this form?

You should complete this form if you are a **UK producer** of the [like goods](#) (as defined on page 5) in this transition review.

## Why you are being asked to complete this pre-sampling questionnaire?

We are seeking your cooperation as a **UK producer** of the **like goods** to inform our review of the existing anti-dumping measures against Organic Coated Steel (OCS) originating in the PRC, and whether to vary (including extending the application of) or revoke the current measures.

If you are not a **UK producer**, please complete either relevant Pre-Sampling Questionnaire (PSQ) for importers or exporters. Alternatively, if you do not fit into any of these categories but have information that you wish to be considered during the investigation, you can complete the Other Interested Party and Contributor Registration Form.

This PSQ allows us to collect basic information and data about your company. It will also allow us to conduct preliminary analyses of the likelihood of dumping and injury continuing or recurring if the measure were to be revoked. If a large number of UK producers complete this PSQ, we will use the information provided to decide which companies to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

If we do not receive sufficient information in this PSQ or the detailed questionnaire (if requested to complete), we may be unable to use your information in the review and will have to rely on facts available to us.

## Note about confidentiality

You will need to submit one confidential version **and** one non-confidential version of your PSQ by the due date, clearly marked either "Confidential" or "Non-confidential" in the header.

Your non-confidential version should be the same as your confidential submission, but with any confidential information redacted, including personal contact information, names and signatures.



Please see the TRA's [public guidance](#) for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

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). All information will be securely stored.

The non-confidential version of your submission will be placed on the public file, which is available on:

<https://www.trade-remedies.service.gov.uk/public/case/TD0054/>.

## Deadline for response

A completed PSQ (confidential and non-confidential versions) must be submitted to the TRA by no later than **30 April 2024**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact [TD0054@traderemedies.gov.uk](mailto:TD0054@traderemedies.gov.uk). Extensions will only be granted with reasonable justification provided, and for a maximum period of half the original completion period (i.e., five days extension in a 10-day registration period). The TRA's guidance on extension requests can be found [here](#).

## The scope of this transition review

### Goods subject to review

This transition review covers certain organic coated steel goods exported from the People's Republic of China (PRC), described as:

Organic coated steel products, such as flat-rolled products of non-alloy and alloy steel (not including stainless steel) which are painted, varnished or coated with plastics on at least one side, excluding so-called 'sandwich panels' of a kind used for building applications and consisting of two outer metal sheets with a stabilising core of insulation material sandwiched between them, excluding those products with a final coating of zinc-dust (a zinc-rich paint, containing by weight 70% or more zinc), and excluding those products with a substrate with a metallic coating of chromium or tin.

These **goods** are currently classifiable within the UK's following commodity code(s):

72 10 70 80 11	72 12 40 80 21	72 25 99 00 91
72 10 70 80 91	72 12 40 80 91	72 26 99 70 11



72 12 40 80 01

72 25 99 00 11

72 26 99 70 91

These commodity codes are only given for information. The **goods** are defined by the current description.

In this pre-sampling questionnaire (PSQ), these **goods** will be referred to as the **goods subject to review** (identified by the goods description above, regardless of the commodity code under which they are exported).

To note: should you disagree with the description of the goods subject to review within the scope of this transition review, you can comment on this in section [C2 – Scope](#).

## Like goods

In this PSQ, the ‘**like goods**’ is defined as goods that are produced in the UK or imported into the UK from a country other than the PRC, and which are like the goods subject to review in all respects, or with characteristics closely resembling them.

This PSQ will ask for information about your company’s production, imports and sales of the like goods.

## Recalculation in transition reviews

Please note that the TRA does not intend to assess whether it is necessary to recalculate the anti-dumping amounts in this transition review unless registered parties to the case provide compelling evidence that it may be appropriate to recalculate. If this is the case, please provide the information as part of this submission in section [C6 – Anything else](#).

**Please follow the instructions for each question to provide the appropriate information regarding the goods subject to review or the like goods.**

For more information, you may refer to the Notice of Initiation published at: <https://www.trade-remedies.service.gov.uk/public/case/TD0054/>

## Section A – Activities of your company and any associated parties

### A1 – Your company’s activities

To determine your company’s role for the purpose of this transition review, please select the activity/activities of your company below. For a definition of **goods**



subject to review/like goods, please refer to above section [‘the scope of this transition review’](#).

- producer of the **like goods** in the UK
- producer of the **like goods** in the UK but also an importer of **like goods** or **goods subject to review**
- other (please give details below)

If you have selected ‘other’, please describe the role of your company with regards to the **goods subject to review** or **like goods**:

## A2 – Associated parties and operational links

Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of the like goods during the Period of Investigation (POI). The POI can be found on the title page of this document. 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](#).

Examples of activities with associated parties could include production, domestic sales, export sales, and/or further processing of the like goods. (i.e., companies owned by the same parent group)

	Company name	Company location (city, country)	Activities	Relationship (i.e., associated supplier, associated sales)
Associated party 1	Tata Steel Europe Limited	London, UK	Manufacturing	Parent company



Associated party 2	Tata Steel Limited	Mumbai, India	Manufacturing	Ultimate parent company
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+ Add additional rows as required

### A3 – Your position in respect of this transition review

Please describe whether you think the anti-dumping measure should be varied (including extended) or revoked and why?:

TSUK submits that the existing anti-dumping measure must be extended. TSUK will provide detailed evidence calling for the extension of the measure at a later stage of the investigation.

### Section B – Production, sales and imports

Please note: if registered parties to the case provide compelling evidence that it may be appropriate to recalculate, our full questionnaires may require detailed transaction by transaction listings of all sales of the like goods during the POI. Further to this, we may also require information related to the costs to produce the like goods.

Please can you confirm whether you will be able to provide this information to the level of detail required? If you answer no, we may not include you in our sample and you may not be sent a full questionnaire.

Yes

No

### B1 – Production

Please fill in your company’s total UK production volume and capacity for the like goods in the table below.



	<b>Volume (Metric tonnes)</b>
Overall production of the like goods during the POI	[200,000-300,000]
Total production capacity of the like goods during the POI	[300,000-400,000]

## B2 – Sales volume and value

Please provide your UK sales data for the like goods produced in the UK by your company.

	<b>Volume (Metric tonnes)</b>	<b>Value in GBP (£)</b>
UK sales of the like goods produced in the UK during the POI	[100,000-200,000]	[200,000,000-300,000,000]

## B3 – Imports and Sales

If your company has imported the goods subject to review or the like goods from the PRC or any other country, and sold them in the UK during the POI, provide your sales data for these:

	<b>Volume (Metric tonnes)</b>	<b>Value in GBP (£)</b>
Imports of the goods subject to review from the PRC during the POI	0	0
Imports of the like goods from countries <u>other than the PRC</u> during the POI	0	0
UK sales of the goods subject to review, imported from the PRC, during the POI	0	0
UK sales of the like goods, imported from countries other than the PRC, during the POI	0	0



## Section C – Additional information

### C1 – Market prices in the PRC domestic & exporters market, and price comparison to the UK market

One of the factors the TRA considers in our analyses is a comparison between the UK domestic prices of the like goods, the prices of the like goods sold domestically in the PRC, and prices of the goods subject to review (exported from the PRC to the UK). To conduct this comparison, we need to understand the PRC market prices of the like goods and the goods subject to review.

For our analyses, are you able to provide examples of the market price of the **goods subject to review exported from** the PRC to the UK, and the **like goods produced and sold** within the PRC – and are you able to support this information with any sources that you consider to be relevant to this investigation?

TSUK will provide detailed information in this respect at a later stage of the investigation. We note that generally, prices of OCS products exported from China to the UK are significantly lower than local price levels in the UK.

Compared to the UK market prices of the **like goods**, please provide any details (and where possible, any sources) that can explain differences between UK market prices and overseas export market prices? This could include, but not be limited to, product quality or production costs.

TSUK will provide detailed information in this respect at a later stage of the investigation. The cost to manufacture OCS is higher in the UK because of increased energy costs, higher wages, paint costs, etc. These factors play a significant role in determining the level of market prices for OCS in the UK.



## C2 – Scope

Please review the scope of this transition review on [page 4](#). Do you consider the description of the goods subject to review to be suitable compared to those produced by the UK industry?

N/A

Are there goods you feel should be included within the scope, or excluded from the current scope?

TSUK agrees with the current product scope. Exclusion of any products from the current scope will have a negative impact on the efficiency of the measure and will lead to the circumvention of the measure by exporters from PRC.



### C3 – 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.

We have created a draft PCN table which is set out below:

Description	Format	Explanation	Indicate
Substrate* thickness in mm**	1 number	≤ 0.4 mm (all =/below 0.4 mm)	<b>1</b>
	1 number	0.41 – 0.5 mm	<b>2</b>
	1 number	0.51 – 0.6 mm	<b>3</b>
	1 number	0.61 – 0.7 mm	<b>4</b>
	1 number	0.71 – 0.8 mm	<b>5</b>
	1 number	> 0.8 mm (all above 0.8 mm)	<b>6</b>
Metallic coating type of the substrate	1 letter	Aluminium and Zinc coating with a minimum of 50% Aluminium content	<b>NO = N</b> <b>YES = Y</b>
Metallic coating mass (two sides)	1 letter	≤ 139g/m <sup>2</sup>	<b>A</b>
	1 letter	140 - 200 g/m <sup>2</sup>	<b>B</b>
	1 letter	≥ 201 g/m <sup>2</sup>	<b>C</b>
Total organic coating thickness on the top side	1 letter, 1 number	≤ 24 µm (micrometres) (microns)	<b>T1</b>
	1 letter, 1 number	25-55 µm (micrometres) (microns)	<b>T2</b>
	1 letter, 1 number	above 55 µm (micrometres) (microns)	<b>T3</b>

\*"Substrate" refers to the basic material for the organic coating process (e.g. the steel sheet);

\*\* "Substrate thickness" includes metallic coating, but not organic coating

Under this PCN structure, organic coated steel assigned PCN **1NBT2** would be a product that corresponds with the following:

- A substrate thickness of 0.3mm;
- No Aluminium and Zinc coating with a minimum of 50% Aluminium content;
- A metallic coating mass (two sides) of 150g/m<sup>2</sup>; and
- A total organic coating thickness on the top side of 40 µm (micrometres) (microns).



Please review the draft PCN structure for this investigation shown in the table above and include any comments on the PCN structure in the box provided below:

N/A
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#### C4 – Other interested parties

If you believe there are other interested parties that should receive a questionnaire, please provide their organisation name and website details below. This could include other producers, importers, exporters, or any other party who may have a contribution to make to the investigation relating to OCS.

Organisation name	Website
N/A	

#### C5 – Economic Interest Test

While conducting a transition review, to make a recommendation to vary (including extending) the anti-dumping measure, we must conduct the Economic Interest Test (EIT). The purpose of the EIT is to determine whether the implementation of the proposed trade remedy measure is in the wider economic interest of the UK.

In order to obtain a complete picture of the UK market, could you please provide us with details of your UK suppliers (upstream companies providing inputs) and UK customers (downstream companies buying your like goods).

	Company name	Company location (city, country)	Company contact information (email/telephone)	Relationship	Can we contact? Yes/No
1	[Confidential]	[Confidential]	[Confidential]	Paint supplier	[Confidential]
2	[Confidential]	[Confidential]	[Confidential]	Paint supplier	[Confidential]
3	[Confidential]	[Confidential]	[Confidential]	Chemicals supplier	[Confidential]



4	[Confidential]	[Confidential]	[Confidential]	Logistics provider	[Confidential]
	[Confidential]	[Confidential]	[Confidential]	Supplier of pellets for transportation	[Confidential]

**C6 – Anything else**

Please use the box below to provide information about anything else you consider relevant to this transition review (e.g., compelling evidence that it may be appropriate to recalculate the anti-dumping amounts; comments around a particular market situation (PMS) in the PRC):

<p>TSUK will provide further comments, including with respect to a particular market situation in the PRC, at a later stage of the investigation.</p>
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Now you have reached the end of this questionnaire. Please ensure that you have prepared a **confidential and non-confidential** version and indicated the status of each within the header. The non-confidential version should redact ALL personal contact information, names, signatures, and exact sales quotes. Redacted figures should be replaced with a range where possible. Please return both versions to the TRA using the Trade Remedies Service ([trade-remedies.service.gov.uk](https://trade-remedies.service.gov.uk)).

If you have any questions or require further guidance, please contact the case team at the email provided.