



## Pre-Sampling Questionnaire (Importer)

### Extension Review

## Case SE0041: Safeguard Measure on Certain Steel Products

Period of Investigation (POI):	1 April 2018 – 31 March 2023
Deadline for response:	19 September 2023
Case Team Contact:	SE0041@traderemedies.gov.uk
Completed on behalf of:	Tinsley Bridge Limited

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 on the computer, so this step is easy to complete.

- 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 **19 September 2023**.



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## The scope of this review

### Goods Subject to Review

This review covers certain steel products imported into the United Kingdom (UK) as detailed in [Annex 1](#).

In this pre-sampling questionnaire, these goods will be referred to as 'the Goods Subject to Review'. Any reference to 'Goods Subject to Review' in this pre-sampling questionnaire refers to the product categories and commodity codes set out in Annex 1.

### Like Goods

In addition to seeking information about your company's imports of the Goods Subject to Review into the UK, this pre-sampling questionnaire will also ask about your purchases of Like Goods. Any reference to 'Like Goods' in this pre-sampling questionnaire refers to goods produced in the UK which are like the Goods Subject to Review in all respects, or with characteristics closely resembling them.

### Directly Competitive Goods

Directly Competitive Goods are goods produced in the UK which are directly competitive with the Goods Subject to Review.

This can include goods that are not only similar to the Goods Subject to Review, such as a different type or variety, but also include goods that occupy a position of direct competition with the Goods Subject to Review. A Directly Competitive Good may be one that is substitutable with the Goods Subject to Review.

**Please follow the instructions for each question to provide the appropriate information regarding the Goods Subject to Review, Like Goods or Directly Competitive Goods.**

For more information about this case, you may refer to the Notice of Initiation published at: [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases)



## Instructions

The Trade Remedies Authority (TRA) will be carrying out a safeguards extension review to consider whether the expiry of a definitive safeguarding remedy would likely result in a continuation or recurrence of serious injury to UK producers of Like or Directly Competitive Goods.

### Who should complete this form

You should complete this form if you are an importer of the Goods Subject to Review into the UK.

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

We are seeking your cooperation as an importer of the Goods Subject to Review to inform our review of whether the current safeguards measure should expire or be extended. If you are not an importer, please complete either the relevant Pre-Sampling Questionnaire or the Other Interested Party and Contributor Registration Form.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of importers of the Goods Subject to Review complete this pre-sampling questionnaire, we will use the information each importer provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

If you do not complete this pre-sampling questionnaire or the detailed questionnaire, you could be found to be non-cooperating. For more details on how this may affect you, please consult our [operational guidance on non-cooperation](#).

### Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than **19 September 2023**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact the case team, [SE0041@traderemedies.gov.uk](mailto:SE0041@traderemedies.gov.uk), and see the TRA's guidance on extension requests for further information.



## Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by **19 September 2023**.

Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes 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 17 of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (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 [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases)



## 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 review, please select the activity/activities of your company below. For a definition of Goods Subject to Review/Like Goods/Directly Competitive Goods please refer to above section 'the scope of this review'.

importer of the Goods Subject to Review into the UK

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, Like Goods or Directly Competitive Goods:

My role is Commercial Director at Tinsley Bridge who are a SME manufacturing supplying high volume engineering components to the Automotive Industry. 95% of sales are exported, the majority to EU locations.

The specialist engineering bars used to manufacture vehicle suspension components are not currently available in the UK and are being procured in the EU. These specialist engineering bars are imported under Steel Safeguarding category 12 tariff code 7228 and incur a 25% duty tariff when the quarter quota is exhausted.

Please describe your interest in this review:



Our company is an importer of engineering steels subject to Category 12a steel safeguarding measures.

Tinsley Bridge are concerned about protecting the UK steel industry against unfair practices from non UK steel manufacturers. However as a downstream user we recognise this is a complex situation as our business has no alternative in the medium term to import raw material from EU steel mills.

- Tinsley Bridge import about 350 tonnes per month at a cost circa £1500- £2000 per tonne. These specialist engineering bars are imported under category 12a tariff code 7228
- From July 2021 to June 22 TBL incurred multiple £100,000s tariff costs for periods after the Category 12 quota repeatedly exhausted. Added value = zero.
- The tariff costs incurred over this time period are greater than the annual profit levels of the business. If we can't make profits then it is impossible to get Trade Credit Insurance precipitating a cashflow crisis as well as a loss. The tariff payments cause other cash flow pressures as these are taken by HMRC at the moment of import
- If tariff costs are repeatedly incurred this will either push the business into administration or we will need to breach contracts with customers asking for exceptional help which will put us on a resource list. Passing duty costs to customers eliminates competitiveness against EU suppliers and will result in losing business with EU customers. There is already a question mark with our European Truck customers that it is more difficult and costly using UK suppliers than an EU supplier due to Brexit. This tariff is entirely the making of the UK Government. The net result of company closure is a loss of 200 jobs at a company that has been in existence for over 150 years and exports over £14m a year.

The Trade Remedies Investigative Directorate (TRID) had previously issued its Statement of Intended Final Determination in the Safeguard Measures on Certain Steel Products case (TF0006). We consider in producing this report TRID had carried out a thorough and detailed investigation accepting evidence from UK producers, importers, steel users and trade bodies.

We recall the TRID report recommended revoking safeguarding measures on 135 tariff codes (including category 12), which it either identified as not being produced in the UK, or where it has determined there is not a substantive risk of an import surge. As you know this recommendation was overturned by the UK government. In consequence TBL are at risk of safeguarding tariffs which undermine our business model with EU customers.

We fully support the development of a strong and sustainable UK steel manufacturing industry capable of competitively supporting companies like ourselves. However, while this is achieved, it is essential to have flexibility to import the materials that are required to maintain production and profitability, without jeopardy of punitive tariffs.

Tinsley Bridge wish to register as an interested party in the Trade Remedies Authority reconsideration of its Steel Safeguarding recommendations.



## 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 Goods Subject to Review, Like Goods or Directly Competitive Goods during the POI. 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 could include manufacturing, exporting, purchasing, warehousing, sales (domestic), sales (export), further processing of the Goods Subject to Review, Like Goods or Directly Competitive Goods.

	Company name	Company location (city, country)	Activities	Relationship
Associated Party 1				
Associated Party 2				

+ Add additional rows as required



## Section B – Details of companies you import from

Please provide the contact details for each individual company you import from.  
Please confirm in the final column whether we have your permission to contact these companies.

Exporter/Supplier name	Address	Contact Details	Permission to contact? (Y/N)
Ovako Bar AB	777 80 Smedjebacken 595 71 Boxholm Sweden		Y

+ Add additional rows as required



## Section C – Sales, imports and domestic purchases

### C1 – Total company revenue

Please provide your company's total revenue and the revenue of the Goods Subject to Review:

	Value in GBP (£)
Total revenue of your company during 2022	15,346,000
Total revenue of your company for the Goods Subject to Review during 2022	13,147,000



## C2 – Your imports of the Goods Subject to Review

Please provide the total volume and value of the Goods Subject to Review imported by your company to the UK during 2022.

The Goods Subject to Review imported into the UK in 2022:

*(Sum of relevant totals in the next three tables should match the relevant volume/value in this table)*

Product category number	Total import volume (Please specify unit of measurement)	Total import value in £ GBP
1		
2		
4		
5		
6		
7		
12A	3836 tonnes	<u>Circa £6m – £8m</u>
12B		
13		
16		
17		
19		
20		
21		
25A		
25B		
26		



The Goods Subject to Review imported into the UK in 2022 and **resold** in the UK:

Product category number	Total sales volume (Please specify unit of measurement)	Total sales value £ GBP
1		
2		
4		
5		
6		
7		
12A		
12B		
13		
16		
17		
19		
20		
21		
25A		
25B		
26		



The Goods Subject to Review imported into the UK in 2022 and **consumed** by your own company:

Product category number	Total consumed volume (Please specify unit of measurement)	Total consumed value £ GBP
1		
2		
4		
5		
6		
7		
12A	3836 tonnes	<u>Circa £6m - £8m</u>
12B		
13		
16		
17		
19		
20		
21		
25A		
25B		
26		



The Goods Subject to Review imported into the UK in 2022 and **exported**:

Product category number	Total export volume (Please specify unit of measurement)	Total export value £ GBP
1		
2		
4		
5		
6		
7		
12A		
12B		
13		
16		
17		
19		
20		
21		
25A		
25B		
26		

### **C3 – Commodity codes**

Please provide the commodity code(s) that you have used to import the Goods Subject to Review to the UK:

7228306990



### **C4 – Like Goods or Directly Competitive Goods purchased from a UK producer**

If you have also purchased Like Goods or Directly Competitive Goods from a UK producer during 2022, please provide the total sales volume and total sales price value of your purchases in the table below.

Like Goods or Directly Competitive Goods purchased from UK producers during 2022:

*(Sum of relevant totals in the next three tables should match the relevant volume/value in this table)*

<b>Product category number</b>	<b>Directly competitive goods name and/or commodity code</b>	<b>Total purchase volume (Please specify unit of measurement)</b>	<b>Total purchase value £ GBP</b>
1			
2			
4			
5			
6			
7			
12A			
12B			
13			
16			
17			
19			
20			
21			
25A			
25B			
26			



Like Goods or Directly Competitive Goods purchased from UK producers and **resold** in the UK market during 2022:

Product category number	Directly competitive goods name and/or commodity code	Total purchase volume (Please specify unit of measurement)	Total purchase value £ GBP
1			
2			
4			
5			
6			
7			
12A			
12B			
13			
16			
17			
19			
20			
21			
25A			
25B			
26			



Like Goods or Directly Competitive Goods purchased from UK producers and **consumed** by your own company during 2022

Product category number	Directly competitive goods name and/or commodity code	Total purchase volume (Please specify unit of measurement)	Total purchase value £ GBP
1			
2			
4			
5			
6			
7			
12A			
12B			
13			
16			
17			
19			
20			
21			
25A			
25B			
26			



Like Goods or Directly Competitive Goods purchased from UK producers and  
**exported** during 2022

Product category number	Directly competitive goods name and/or commodity code	Total export volume (Please specify unit of measurement)	Total export value £ GBP
1			
2			
4			
5			
6			
7			
12A			
12B			
13			
16			
17			
19			
20			
21			
25A			
25B			
26			



## Section D – Additional information

### D1 – 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.

Organisation name	Website

### D2 – Scope

Do you agree with the scope of the investigation as outlined on page 3?

Yes

No

Theoretically Liberty had capability to manufacture the raw material grades we use. They have not supplied Tinsley Bridge for the last 30 years. We have repeatedly sent enquiries to Liberty. In the past they have been neither strategically interested or competitive. Steel is a large proportion of our costs and TBL cannot use an uncompetitive steel supplier to remain competitive in export markets.

Subsequent to their financial difficulties the raw material grades used by Tinsley Bridge are not available and Liberty will not quote.

We understand including Cat 12a material in safeguarding is to protect Liberty. If Liberty are able to competitively re-enter this market we are ok for Cat 12a in Safeguarding. Due to lead-times and required approval processes it would take 12-18 months from Liberty re-entering this market to achieve volume supply. What is needlessly damaging UK competitiveness is including Cat12a in Safeguarding when there is no UK supply available. The government has rapidly changed the law to keep Cat 12 in safeguarding 1st July 2021 and has the ability to do so again if and when Liberty are able to restart supply of these steel grades.



Please explain why:

**D3 – Economic Interest Test**

It is a requirement of the review to conduct an Economic Interest Test (EIT). The aim 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 help by providing us with details of any known UK suppliers (upstream companies providing inputs) and UK customers (downstream companies buying UK produced goods). Please confirm in the final column if we have your permission to contact these companies.

	Company name	Company location (city, country)	Company Contact Information (email/telephone)	Relationship	Permission to contact? (Y/N)
1					
2					
3					
4					



## D4 – Anything else

Please use the box below to provide information about anything else you consider relevant to this review.

We are aware the unconsumed quota balance has been high in recent quarters. Our steel suppliers advise a massive reduction in orders due to market downturns and huge increases in raw material and energy costs. This also resulted in major destocking of raw material which exaggerates these reductions. The quota consumption has been at higher levels than current quota during 2021 and 2022. Reducing current quotas would risk very quickly exhausting quota as and when markets return to the levels seen previously. From past experience it would not be possible to increase quotas quickly if they became inadequate as government machinery and decision making moves much slower than international markets.

As an SME company we lack the resources and in house expertise responding to this review compared to the large steel producers and their industry representatives with both the funding and contacts to make their case very loud. We are concerned there continues to be a clear lack of understanding of the issues faced by downstream manufacturers, especially SMEs who are the lifeblood of our economy.

In total, there are 1.4 million SMEs (not including those with just one employee) who collectively employ 11.9 million people. Yet, these companies and individuals are barely represented at the Government table. We are concerned that the government may respond to the pressure of large lobbying interests and ignore the considered advice of this review as happened to the TRID recommendations in 2021. By not considering wider interests including downstream SME's, the UK's competitiveness is undermined for many UK manufacturers.

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 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)).



## Annex 1

The certain steel products subject to review are currently classifiable within the following commodity codes. These commodity codes are only given for information.

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