

Statement of Essential Facts

REVIEW No. ER0081

Expiry review into Welded Tubes & Pipes originating from the Republic of
Belarus and the People's Republic of China

27 April 2026

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Section A: Introduction

A1 Review

1. On 09 August 2021, the TRA published its final determination for TD0001: Welded Tubes and Pipes originating in the Republic of Belarus (Belarus), the People's Republic of China (PRC), and the Russian Federation (Russia).¹
2. On 09 September 2021, the TRA received an application for reconsideration of the final determination by a UK producer and on 24 November 2021, the TRA initiated a reconsideration of the transition review regarding Welded Tubes and Pipes.²
3. On 29 June 2023, the TRA published its reconsideration report and Trade Remedies Notice 2023/09³ gave effect to the reconsidered recommendation to: not vary the anti-dumping duty on Welded Tubes & Pipes from Belarus and the PRC; and revoke the anti-dumping duty on Welded Tubes & Pipes from Russia. The measure was set to expire on 30 January 2026.
4. On 27 January 2026, we published our Notice of Initiation to confirm the start of our expiry review.⁴
5. Trade Remedies Notice 2026/04 confirmed the application of the anti-dumping measure relating to Welded Tubes & Pipes from Belarus and the PRC will continue during the review, pursuant to Regulation 70(9) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations).⁵ This will be until the TRA makes a determination that the anti-dumping measure should expire, the Secretary of State for Business and Trade (Secretary of State) has accepted or rejected the TRA's recommendation, or the Secretary of State has made a decision to apply an alternative remedy.

A2 Statement of essential facts (SEF)

6. This SEF is made pursuant to Regulation 62 of the Regulations.⁶ It includes:
 - The determination that the TRA intends to make;
 - a summary of the facts considered during the review;
 - those facts referred to in the summary that formed the basis of the intended determination;
 - details of how the TRA has used the information supplied by interested parties and contributors in making the intended final determination; and

¹ [Trade Remedies Service | TD0001 Final Determination.](#)

² [Trade Remedies Service | TD0001 Reconsideration Application.](#)

³ [Trade Remedies Notice 2023/09: anti-dumping duty on Welded Tubes & Pipes from Belarus & the PRC.](#)

⁴ [Trade Remedies Service | ER0081 Notice of Initiation.](#)

⁵ [The Trade Remedies \(Dumping and Subsidisation\) \(EU Exit\) Regulations 2019.](#)

⁶ Regulation 62 and Parts 2, 3, 4 and 6 of the Regulations apply to reviews to the extent that the TRA considers relevant pursuant to Regulation 68(8) of the Regulations.



- details of the analysis forming the basis of the intended recommendation.
7. This SEF should be read in conjunction with other public documents available for this case, which are available on the [public file](#).
 8. Pursuant to Regulation 62(2) of the Regulations, interested parties, contributors, and any other person who has supplied information to us are invited to make submissions within 30 calendar days of the publication date of this SEF, i.e., before 23:59 hours (BST) on **27 May 2026**.
 9. We are not obliged to consider submissions made after this date if it is determined this would significantly impede the progress of the review. Where we reject information for any reason, we will publish the reasons for the rejection in the final determination.
 10. Registered interested parties and contributors to the case can make submissions on the Trade Remedies Service online platform (TRS). These submissions must be accompanied by a non-confidential version of the submission for the public file. Those not registered on the TRS may send submissions by email to ER0081@traderemedies.gov.uk. These submissions must also be accompanied by a non-confidential version for the public file.
 11. In exceptional circumstances it may not be possible to summarise confidential information. If this is the case, interested parties must provide a 'statement of reasons', as defined under Regulation 45(6)(b) of the Regulations, setting out the reasons why we should treat the information as confidential and why summarisation of the information is not possible.
 12. For further information about our reviews, please see our [public guidance](#)

A3 Period of investigation and injury period

13. The period of investigation (POI) is 01 October 2024 to 30 September 2025.
14. To assess the injury likelihood, the TRA has chosen the period from 01 October 2021 to 30 September 2025 as the injury period (IP).

Section B: Summary and findings

B1 Dumping likelihood assessment

15. In accordance with Regulation 70(6)(a) of the Regulations, the TRA has considered whether dumping of the goods subject to review (see [Section D1 Goods subject to review](#)) is continuing or is likely to recur if the application of the anti-dumping amount were to expire.
16. We concluded that dumping of the goods subject to review into the UK from Belarus is likely to recur if the application of the anti-dumping amount were to expire (see [Section E2 Belarus](#)).
17. We concluded that dumping of the goods subject to review into the UK from the PRC is likely to continue or recur if the application of the anti-dumping amount were to expire (see [Section E3 the PRC](#)).

B2 Injury likelihood assessment

18. In accordance with Regulation 70(6)(b), the TRA has considered if injury has been removed or reduced in whole or in part by the application of the anti-dumping amount. In accordance with Regulation 70(6)(c) the TRA has considered whether injury to UK industry caused by the dumped goods is likely to continue or recur, if application of the anti-dumping amount were to expire.
19. We concluded that injury to UK industry caused by dumped goods is likely to recur, if the application of the anti-dumping amount were to expire (see [Section F Injury likelihood assessment](#)).

B3 Economic interest test (EIT)

20. In accordance with Regulations 70(12) and 75(2E) of the Regulations, if the TRA determines that the anti-dumping amount should be extended, the TRA must conduct the EIT and advise the Secretary of State on whether, and why, it considers that extending the anti-dumping amount would meet the EIT.
21. In accordance with paragraph 25 of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 ('the Act'), the EIT is met in relation to the application of an anti-dumping measure if the application of the measure is in the economic interest of the UK. The EIT is presumed to be met unless we are satisfied that the application of the measure is not in the economic interest of the UK.
22. The TRA considers that the proposed extension of the measure in accordance with our intended final recommendations meets the EIT, as per Regulation 75(2E) of the Regulations (see [Section G EIT](#)).

B4 Intended final determination

23. The TRA's intended final determination is that the application of the anti-dumping amounts to the goods subject to review should be extended, pursuant to Regulations 70(11)(b) of



the Regulations, so that they apply to all of the goods subject to review imported into the UK until 30 January 2031 – this is, five years subsequent to the date when the measure would have expired (30 January 2026) had no expiry review been initiated. No information was received to lead us to consider that it was appropriate to amend the level of the anti-dumping amounts.

24. We intend to recommend to the Secretary of State that the anti-dumping amounts be extended, pursuant to Regulation 75(1)(c) of the Regulations.
25. The relevant duty amounts are specified in the Trade Remedies Notice 2023/09, and repeated below:

| Table B1: Recommended ad-valorem duty rates | |
|---|------------------------|
| Overseas exporter/producer | Duty amount (%) |
| All other overseas exporters from Belarus (residual amount) | 38.1% |
| All other overseas exporters the PRC (residual amount) | 90.6% |

26. The description of the goods to which the measures applies (that is, the goods subject to review) is set out in [Section D The goods](#). We consider it necessary to recommend the extension of the application of the anti-dumping amount to all of the goods subject to review. We have not received any information that suggested some of the goods subject to review should be excluded
27. We intend to make this recommendation based on the conclusions we have reached, as summarised in Sections B1, B2 and B3 above.

Section C: Background

C1 Participation in the review

28. The TRA invited interested parties and contributors to register in order to participate in the review. Details of those parties and links to their submissions can be found in [Annex A](#).

C2 Verification of data

29. The TRA undertook verification activities in relation to the information provided by the cooperating interested party, during which the completeness, relevance and accuracy of that information was assessed. We had regard to the information supplied by interested parties and contributors, providing that this information:
- was verifiable;
 - could be used by the TRA without undue difficulty; and
 - was supplied within an applicable time limit and in a form that we requested.
30. We conducted onsite verification with the applicant to this review, TATA Steel UK (TSUK) between 17 and 18 March 2026, and the verification report for that visit is available in a non-confidential format on the [public file](#).
31. Secondary source information was used in accordance with the Regulations. This secondary information was treated with special circumspection and, where practicable, verified using independent sources. This included, but was not limited to, official import statistics and data pertaining to relevant markets.

Section D: The goods

D1 Goods subject to review

32. The goods subject to review are defined in Regulation 2 of the Regulations as “the goods described in the relevant notice of initiation of review under paragraph 1 of Schedule 3 [of the Regulations]”.

33. The goods subject to review in this expiry review are Welded Tubes & Pipes (WTP) imported into the UK from Belarus and the PRC, described in the Notice of Initiation⁷ as:

Welded Tubes & Pipes, of iron or non-alloy steel, of circular cross-section and of an external diameter not exceeding 168.3 mm, excluding line pipe of a kind used for oil or gas pipelines, casing and tubing of a kind used in drilling for oil or gas, precision tubes and tubes and pipes with attached fittings suitable for conducting gases or liquids for use in civil aircraft.

34. The goods subject to review are subject to the following commodity codes (which are subject to change and are only provided for information):

7306 3041 20 7306 3049 20 7306 3077 80 7306 3072 80

D2 Like goods

35. In accordance with paragraph 7 of Schedule 4 to the Act, the TRA refers to ‘like goods’ as those which are like the goods subject to review in all respects or have characteristics which closely resemble them.

36. Belarusian or PRC produced goods can be “like goods” if they are not imported into the UK.

D3 Comparison of goods subject to review and the like goods

37. In assessing whether the goods produced by the UK industry are like the goods subject to review in all respects or with characteristics closely resembling them, the TRA has considered:

- a) physical likeness, including physical characteristics;
- b) commercial likeness, including competition and distribution channels;
- c) functional likeness, including end-use or interchangeability of the goods;
- d) similarities in production, including method of production and inputs; and
- e) other relevant characteristics.

38. The TRA has found that:

- Like goods are produced by UK industry. These have the same general physical, commercial and functional likenesses as the goods subject to review and share similar production processes.

⁷ [Trade Remedies Service | ER0081 Notice of Initiation](#).



- Like goods are also produced by the overseas producers for sale on the domestic markets. These have the same general characteristics as the goods subject to review.
39. The TRA has determined that the goods produced by the UK industry defined in [Section D2](#) are like the goods subject to review in all respects or have characteristics closely resembling. Therefore they qualify as “like goods” for the purposes of paragraph 7 of Schedule 4 to the Act.

Section E: Dumping likelihood assessment

E1 Introduction

40. In accordance with Regulation 70(6)(a) of the Regulations, the TRA is required to consider whether dumping of the goods subject to review is continuing or is likely to recur, if the application of the anti-dumping amount were to expire.
41. We considered the likelihood of dumping from Belarus and the PRC separately and on countrywide bases rather than exporter-by-exporter, as there were no cooperating Belarusian or PRC exporters registered to this case. Accordingly, there was insufficient available data relating to individual exporters.
42. The dumping likelihood assessments considered: the continued imports of WTP; the ability and incentive to dump into the UK; market distortions, such as a particular market situation (PMS); and any other relevant factors.
43. The TRA based its assessment on the best available data, having sought information from exporters known to the TRA at the initiation of the review.

E2 Belarus

E2.1 Sanctions upon the Republic of Belarus

44. The TRA acknowledges that the UK Government's decision to place trade sanctions on Belarusian goods, following the Russian invasion of Ukraine, has had an impact on Belarus' ability to export the goods subject to review to the UK. This has not prevented our ability to complete our review as this is based on forward-looking likelihood assessments.
45. The factors that determine whether sanctions are amended, continue, or are withdrawn are beyond the scope of a trade remedies investigation or review, and cannot be predicted. As such, we have not considered the future potential impact of sanctions remaining in place as part of our conclusions on the likelihood of continuation or recurrence of dumping and injury.
46. This does not preclude the TRA from examining the impacts that international sanctions have had upon the Belarusian WTP industry during the period of investigation.

E2.2 Continued dumping of Welded Tubes & Pipes

47. The TRA requested and reviewed HMRC raw customs declarations data for the relevant commodity codes of the goods subject to review. The data shows that there have been no imports of the goods subject to review from Belarus during the injury period. We note that the prior review of Welded Tubes & Pipes (TD0001), also recorded in its final determination that there were no imports of the goods subject to review from Belarus in its injury period (1 January 2016 to 31 December 2019).⁸

⁸ [TRA Investigations | Trade Remedies Service](#), paragraph 7.4.



48. Due to the absence of imports of the goods subject to review from Belarus, we could not draw any conclusions on the continuation of dumping during the injury period. Therefore, we considered the likelihood that dumping would recur, if the application of the anti-dumping amount were to expire.

E2.3 Price Analysis

49. The TRA sought information regarding domestic pricing within Belarus, but did not receive any cooperation from producers of WTP within Belarus. The TRA sought out information on which to base its assessment of the domestic price within Belarus but due to a lack of information, it was unable to find sufficient information to do so.
50. As such, the TRA has relied on information provided in the application⁹ to form the basis of Belarus' domestic price for the purposes of the price comparison. As noted in the application, Belarus is not a member of the WTO and therefore Regulation 14(1)(a) of the Regulations applies in respect to determining a normal value. Where this regulation applies, the TRA may calculate normal value on the basis of an appropriate third country in accordance with Regulation 14(2)(b) of the Regulations. The applicant provided a reasonable rationale as to why Mexico was an appropriate third country as a basis for a comparable price, as both are upper-middle-income countries, and Belarus has GDP per capita of US\$7,221 compared to Mexico's US\$9,764. The TRA has received no information to indicate that this methodology is not appropriate.
51. This methodology resulted in a constructed normal value, ranged within the non-confidential application between £900-1200 per tonne.
52. Trade data regarding Belarusian exports is not complete as Belarus stopped reporting in 2022, and mirror data omits its most significant trade partner, Russia. As such, in order to construct a price to use as a baseline for determining the likelihood of dumping, the TRA has reviewed trends in countries that export steel tubes with similar GDP to Belarus. This was then compared to the balanced price for October 2020 – September 2021. These months align with the POI/IP months. The first year of the IP, October 2021 – September 2022 is impacted by data obscurity following Russia's invasion of Ukraine in February 2022, and so the October 2020 – September 2021 period was selected as the reference year. The PRC was excluded due to prices reflecting non-commercial factors as discussed in Section E3.

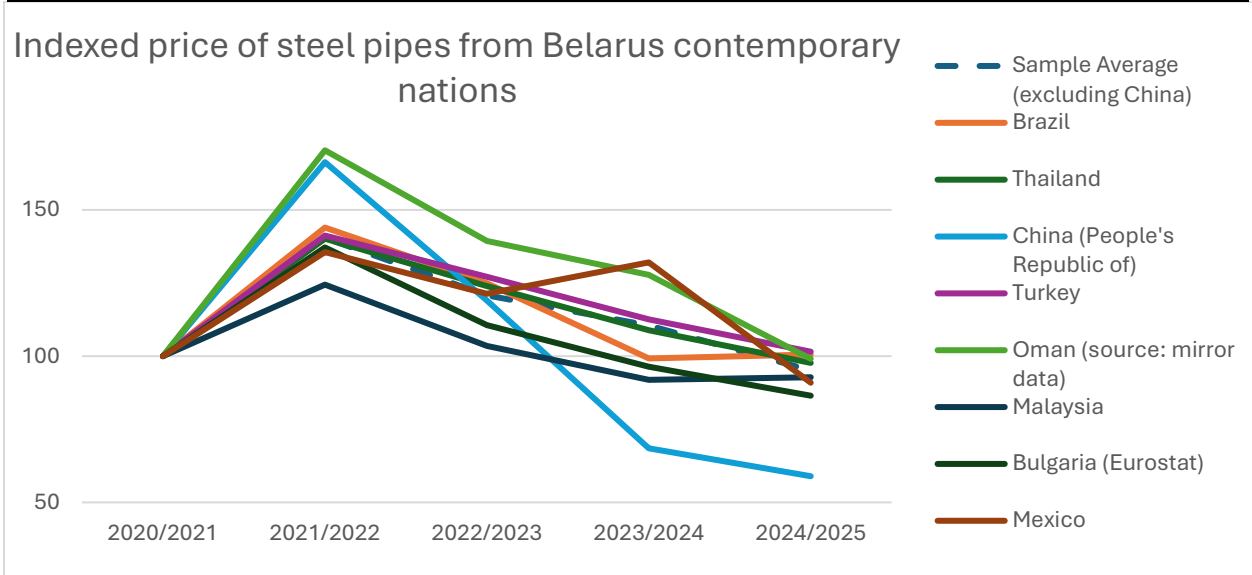
| Table E1: Indexed price of steel pipes from nations comparable with Belarus | | | | | |
|---|-----------|-----------|-----------|-----------|-----------|
| | 2020/2021 | 2021/2022 | 2022/2023 | 2023/2024 | 2024/2025 |
| Sample Average (excluding PRC) | 100 | 140 | 121 | 111 | 95 |
| Brazil | 100 | 144 | 125 | 99 | 101 |
| Thailand | 100 | 140 | 124 | 109 | 98 |
| Turkey | 100 | 141 | 127 | 113 | 102 |
| Oman (Mirror data) ¹⁰ | 100 | 170 | 139 | 128 | 99 |

⁹ TRA Investigations - Trade Remedies Service - GOV.UK Accessed 31/03/2026.

¹⁰ Mirror data is based upon reported imports in third countries, rather than exports directly reported by the country in question.



| | | | | | |
|---------------------|-----|-----|-----|-----|----|
| Malaysia | 100 | 124 | 104 | 92 | 93 |
| China (PRC) | 100 | 166 | 119 | 69 | 59 |
| Bulgaria (Eurostat) | 100 | 137 | 111 | 96 | 86 |
| Mexico | 100 | 136 | 121 | 132 | 91 |



Source: GTT.

53. In the POI, the average price was 95.1% of the price in 2020/2021. All countries followed a similar trend: a peak in 2021/2022, then a steady decline thereafter. We have used this average change to project Belarus' export price for the POI. Belarus' price in 2020/2021 was £578.60. Therefore, the export price used for Belarus for the price analysis will be £550.26.
54. Even assuming the most favourable circumstances and selecting £900 (the lowest limit of the range) as the normal value, the Belarusian export price of £550.26 is far below this figure. This is before considering any distortions, as noted in Section E2.5.3, that would increase the margin of dumping.
55. As such, the TRA concludes that the price analysis supports the likelihood of dumping occurring.

E2.4 Assessment of ability to export dumped goods subject to review

E2.4.1 Production capacity

56. The TRA has not received any submissions that provide information related to the production capacity of Belarusian producers of WTP. Therefore, we utilised the available data collected through open-source research and third-party information.
57. In its 2021 definitive measures, the European Commission estimated that Belarusian producers had around 125,000 tonnes of spare capacity.¹¹ The production of steel pipes

¹¹ [European Commission | Implementing regulation \(EU\) 2021/635](#) Accessed 27/02/2026.



within Belarus was 236,795MT in 2021 according the USGS¹² data, giving an approximated total capacity of around 350,000 MT per year.

58. However, the National Statistical Committee of the Republic of Belarus (NSCRB) listed capacity utilisation in 2021 as 50.3%¹³ for “tubes of steel” which would imply a total capacity closer to 480,000 MT per year using the USGS data as a baseline.
59. We have not been able to identify more recent reports on Belarusian Welded Tubes & Pipes production capacity that would indicate a significant change from this – for example, production lines being closed or opened.
60. The TRA acknowledges that not all of the tubes and pipes referred to in the various data sources will be directly in scope, however as the TRA understands that production lines can switch to make various types of welded pipe, it is deemed likely that Belarus has significant capacity and significant slack capacity that could be utilised for WTP should demand increase.

E2.4.2 Production levels

61. There are significant production levels of WTP within Belarus, though the exact amounts cannot be determined from publicly available information. Belarus has become increasingly opaque over the course of the IP due to international isolation resulting from its response to the 2020-2021 domestic protests and its support for the Russian invasion of Ukraine in 2022. Despite Belarus not reporting its export statistics to financial data platforms, mirror-gap analysis shows that it continues to produce and export steel tubes, as discussed in E2.3.2. Mogilev Metallurgical Works (MMW) – part of the Belarusian Steel Works (BMZ)¹⁴ whose state affiliation is discussed in Section E2.5.3 – manufactures a variety of WTP products that fall within the scope. These are listed in MMW’s online catalogue.¹⁵
62. In 2023, the Belarusian Metallurgical Plant (part of the BMZ) claimed to have increased its general steel production levels by 250,000 tonnes to meet domestic and foreign demand.¹⁶ It notes that one of the main drivers behind the increase in production was to provide a substitute for imports, which have been limited by sanctions in response to Belarus’s support for Russia’s invasion of Ukraine. It further reports that, between 2022 and 2023, industrial production volumes, in comparable conditions, grew by no less than 12 percent.¹⁷ This increased further during the first half of 2024, with steel output exceeding one million tonnes (2.2% increase), while pipe output in this period exceeded 60 thousand tonnes.¹⁸

12 [Europe and Central Eurasia | U.S. Geological Survey](#) Accessed 19/03/2026.

13 [National Statistical Committee of the Republic of Belarus | Capacity Use](#) Accessed 19/03/2026.

14 [Trade House | Mogilev Metallurgical Works Basic Information](#) Accessed 27/02/2026.

15 [MMZ | Pipe Catalogue](#) Accessed 27/02/2026.

16 [SB BY | They Make it Hot](#) Accessed 27/02/2026.

17 [SB BY | They Make it Hot](#) Accessed 27/02/2026.

18 [Steel Radar | BMZ Increased Steel Production by 102.2%](#) Accessed 27/02/2026.



63. Globally, tubes and pipes tend to constitute around 8-10% of the steel industry,¹⁹ and Belarus' production is consistent with this: pipe production averaged 10% of the raw steel production for Belarus between 2013 and 2022 according to figures from the USGS. Overall steel production has remained relatively consistent between 2.3 million MT per year between 2013 and 2024 (dates for which estimates can be sourced),²⁰ with steel pipe averaging 233,296MT per year over this timeframe.
64. This represents a high production volume and will have likely been maintained over the POI. While not all of this production will be within the description of the goods subject to review, it is likely that a significant proportion is.

E2.4.3 Inventory

65. In October 2022, BMZ leadership notably complained about a lack of railcar availability to export products, highlighting that the constraint could lead to a halt in production.²¹ The letter from leadership went on to state: *“At the same time, there are no BMZ mass storage warehouses for finished products.”*
66. This indicates that Belarus likely has limited capacity to store inventory, and that to maintain production stock needs to be moved out of the stockyards at a similar rate. This likely incentivises Belarusian WTP producers to shift goods in order to maintain production levels at high rates and minimise slack capacity and higher relative overheads.

E2.4.4 Ability to shift production to the goods subject to review

67. WTP are generally produced on multi-use production lines that can output a large range of pipes, most beyond the scope of this review. When reviewing the production catalogues of various producers of WTP, a large range of similar products, of which in-scope WTP make up only a small proportion, is produced on the same production lines. Adjusting production to create in-scope goods would be a routine part of operating those production lines, including for MMW. A production line can shift between producing in-scope and out-of-scope goods within the space of a few hours or even minutes, and is a routine part of operating a pipe mill.
68. The BMZ is no exception to this. In 2021, the aforementioned European Commission review determined that Belarus has the option to redirect production, from products such as hollow sections to WTP.²²
69. MMW's online product catalogue reflects an extensive range of steel hollow section production.²³

19 [Steel Pipes and Tubes Market Size & Industry Report, 2034](#) Accessed 16/03/2026 ; [European-Steel-In-Figures-2024-v2.pdf](#) Accessed 16/03/2026.

20 [Europe and Central Eurasia | U.S. Geological Survey](#) Accessed 19/03/2026. ; [Steel production | Belarus – yearly data, chart and table](#) Accessed 19/03/2026

21 [BMZ cannot export products due to military transportation on the Belarusian railway – Metal News – Belarus – Russian Aggression](#) Accessed 23/03/2026.

22 [European Commission | Implementing regulation \(EU\) 2021/635](#) Accessed 27/02/2026.

23 [MMZ | Hollow Section Catalogue](#) Accessed 27/02/2026.

70. This means that should demand for the goods subject to review increase, there would be minimal friction to diverting capacity towards the production of those goods. As such, analysis of the capacity to produce WTP should account for the wider industry of the types of steel pipe produced on these production lines, in addition to the slack capacity outlined in Section E2.3.1.

E2.4.5 Conclusions on ability to export dumped goods subject to review

71. The TRA has determined that Belarus has the capacity and ability to export dumped goods subject to review if the measure were to expire.

E2.5 Assessment of incentives to dump the goods subject to review to the UK

E2.5.1 Market prices in the UK and the overseas exporters market

| Table E1: Unit Prices (GBP/MT) | |
|---|----------|
| Belarus export price (Constructed by the TRA, using third country data) | £550.26 |
| UK market average price | £800-850 |

Source: GTT Data, UK: HMRC raw custom declarations data, Producer questionnaires.

72. The average prices within the UK market are higher than the export price of Belarus. Moreover, the EU has existing measures in place on WTP from Belarus. Therefore, should the UK's measure expire, the UK will have a higher exposure relative to contemporaries.

E2.5.2 Current and projected market conditions in third countries

73. According to the press service of the BMZ, in 2024 it emphasised its focus to remain "export oriented".²⁴ Furthermore, the deputy general director for external economic relations, sales and distribution network management reported that exports accounted for about 80% of the company's activity. This suggest that BMZ would likely export more goods subject to review, should no sanctions exist, and if the current anti-dumping measure were allowed to expire.

| Table E2: Belarus total exports | | | | |
|---------------------------------|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Total exports (MT) | 2512.75 | 50.46 | 51.40 | 35.80 |
| Indexed | 100.00 | 2.01 | 2.05 | 1.42 |

Source: GTT

74. The apparent decline in exports in Table E1 does not necessarily reflect an actual decline in production levels or exports, as mirror-gap analysis relies on third countries reporting import data. Given Belarus's primary trading partner for steel products is the Russian Federation,²⁵ which has also ceased providing reliable trade statistics to financial data platforms, Table E1 should only be seen as evidence that the production of goods under

²⁴[Steel Radar | BMZ Increased Steel Production by 102.2%](#) Accessed 27/02/2026.

²⁵[SB BY | In 2023, the Belarusian Metallurgical Plant increased steel production by 250 thousand tonnes](#) Accessed 27/02/2026.



HS code 730630 in Belarus continues, despite a lack of reporting. This is the result of restrictions imposed by Belarusian authorities, who have hidden granular data, including by commodity code, since 2022.²⁶

75. The General Director of the BMZ also noted that another reason behind the increased production levels was “to significantly increase the number of external shipments of metallurgical products”.²⁷
76. Despite the European Union and Ukraine ending access to previously used shipping routes, the BMZ still has access to maritime transportation via the ports of St. Petersburg, Novorossiysk, and Rostov-on-Don, which it uses for exports to third countries.²⁸ The BMZ continues to report an increase in exports of steel products to at least 16 third countries, but notes that the majority of its exports go to the Russian Federation.²⁹
77. The WTO database shows that the European Union, as well as the UK, maintains anti-dumping measures on imports of Welded Tubes & Pipes from Belarus.³⁰

E2.5.3 Current and projected conditions in the overseas exporter’s domestic market

78. The EU considered Belarus to be a ‘non-market economy’ in its initial investigation.³¹ The United States has categorised Belarus as a Non-Market Economy for purposes of calculating dumping margins in its antidumping cases.³²
79. In TD0001, the TRA determined that there was a likelihood of market distortion in Belarus as a result of state ownership.³³ It noted that unused capacity is a common characteristic of state-owned enterprises, which increases the risk of the company in question selling off its products at a loss.
80. Belarus is characterised by state-owned companies, with both heavy strategic and financial influence from the Government of Belarus.
81. The Belarusian steel industry, specifically the BMZ, is not exempt from government control, and, along with its parent company, is subject to government grants, subsidies,

26 [Sailing Through Rough Waters](#) Accessed 25/03/2026 ; [Belarus goods trade deficit hits \\$7 billion](#) Accessed 25/03/2026.

27 [SB BY | In 2023, the Belarusian Metallurgical Plant increased steel production by 250 thousand tonnes](#) Accessed 27/02/2026.

28 [SB BY | They Make it Hot](#) Accessed 27/02/2026.

29 [SB BY | They Make it Hot](#) Accessed 27/02/2026; [SB BY | In 2023, the Belarusian Metallurgical Plant increased steel production by 250 thousand tonnes](#) Accessed 27/02/2026.

30 [WTO Trade Remedies Data Portal | Antidumping measures](#) Accessed 27/04/2026.

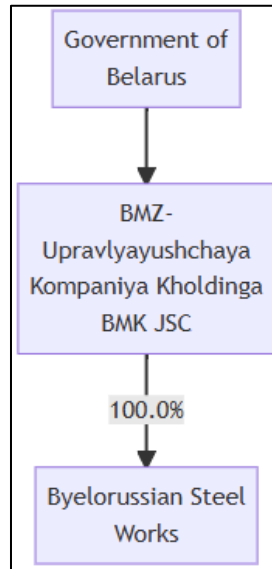
31 [Regulation - 1256/2008 - EN - EUR-Lex](#) Accessed 16/03/2026.

32 [USITC | Belarus Remains a Non-Market Economy](#) Accessed 27/02/2026.

33 [TD0001](#) Accessed 27/02/2026.



appointed leadership, and, therefore, strategic steering.³⁴ The BMZ has previously categorised itself as “property of the state”.³⁵



(Source: Global Energy Ownership Tracker, a project of Global Energy Monitor)

82. In 2023, the European Union, in its justification for sanctions on the BMZ, asserted that “The Belarusian State is directly profiting from the earnings made by OJSC BSW – management company of ‘BMC’ [BMZ] holding”, and that “The general director of OJSC BSW – management company of “BMC” [BMZ] holding was personally appointed by President Lukashenko”³⁶
83. Russia has extended various benefits to Belarus, including access to Russian gas and oil at below market value, which has resulted in direct subsidies being applied to Belarusian industries.³⁷ It is likely that the strategic partnership between Belarus and Russia is driving the current demand, as both countries seek to counter the effects of sanctions stemming from the war in Ukraine.³⁸ This is further evidenced by President Lukashenko’s description of the current economic situation as ‘almost wartime’.³⁹

34 [Global Energy Monitor | Byelorussian Steel Works](#) Accessed 27/02/2026.; [EU | COUNCIL IMPLEMENTING REGULATION \(EU\) 2023/1591](#) Accessed 27/02/2026

35 [BMZ | Structure of BMZ – Archived from 19/01/2022](#) Accessed 27/02/2026.

36 [Open Sanctions | OPEN JOINT STOCK COMPANY BYELORUSSIAN STEEL WORKS](#) Accessed 27/02/2026.

37 [The Belarus Economy: The Challenges of Stalled Reforms](#) – Accessed 16/04/2026

38 [SB BY | In 2023, the Belarusian Metallurgical Plant increased steel production by 250 thousand tonnes](#) Accessed 27/02/2026.

39 [Belta | Economy is now the real battlefield in almost wartime conditions](#) Accessed 27/02/2026.



84. These factors mean the WTP market and industry within Belarus is likely heavily distorted by non-commercial decisions and pressures.

E2.5.4 Current and projected market conditions in the UK market

85. During the POI, 64% of the UK's consumption of WTP was being met by imports – a 4% increase from the year prior. Therefore, market infrastructure already exists to enable a surge in dumped WTP from Belarus.
86. The UK market is mature and is not expected to significantly change in the coming years.

E2.5.5 Whether overseas exporters have previously or habitually circumvented or absorbed the effects of trade remedies

87. The TRA has found no conclusive evidence of Belarus habitually circumventing or absorbing the effects of trade remedies.

E2.6 Conclusion on the Belarus dumping likelihood assessment

88. The TRA reviewed each factor individually and together to provide a holistic picture when determining the likelihood of dumping for Belarus should the measure expire without replacement. The TRA reviewed all factors outlined at the outset of Section E. Having done so, the TRA concluded that:
- a. It is likely that the producers of WTP within Belarus have the ability to dump; and
 - b. It is likely that the producers of WTP within Belarus have an incentive to dump.
89. The TRA therefore concludes dumping of the goods subject to review from Belarus is likely to recur if the application of the anti-dumping duty were allowed to expire.

E3 The PRC

E3.1 Continued dumping of Welded Tubes & Pipes

E3.1.1 Imports of the goods subject to review

90. Imports of the goods subject to review from the PRC have continued, at extremely low levels, since TD0001 and the imposition of the measure.
91. The TRA has conducted an analysis, based on import data, of the import prices of the goods subject to review. Due to the small amounts of the imported goods, the TRA was not able to perform reasonable analysis at the commodity code level and instead looked at the imports holistically.
92. The volume of imports was exceptionally low during the POI. In only one year, 2022/2023, were the volumes of imports from the PRC significant, which was also the year when PRC prices reached their lowest point. This increase only lasted for one year, and we conclude that imports were insufficient to base further analysis on whether dumping is occurring or not upon.

| Table E3: PRC Unit Prices relative to market | | | | |
|---|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Volume of goods subject to review imported from the PRC | 100 | 317 | 73 | 2 |
| Total market (excluding PRC) | 100 | 79 | 76 | 71 |
| PRC unit price | 100 | 28 | 115 | 353 |

Source: HMRC raw customs declarations data, UK Producer Questionnaires

E3.1.2 Particular Market Situation (PMS)

93. The applicant alleged that a PMS exists within the PRC with regards to WTP (Section 4.1.1.1.1. of the application). The applicant cited the analysis and conclusions of the latest expiry review undertaken by the European Commission (EC)⁴⁰ as the core of its application for allegations regarding PMS.
94. The allegation covers:
- Structural distortions in PRC's economic system, relating to:
 - The domination of state ownership (socialist market economy)
 - Chinese Communist Party (CCP) leadership embedded at all layers of governance and enterprise management
 - State-driven economic planning
 - Financial, regulatory and legal system distortions
 - Selective enforcement of bankruptcy
 - Favourable allocation to state-owned enterprises (SOEs) and politically important sectors
 - Systematic distortion of all factors of production within the PRC, including:
 - Raw materials

40 [European Commission | Implementing regulation \(EU\) 2021/635](#) Accessed 09/02/2026.



- Energy
- Land
- Labour

95. These allegations align with non-commercial factors (within the meaning of Regulation 7(4)(c) of the Regulations) investigated and upheld in recent TRA cases,⁴¹ are covered and reflected in the EC's *Commission staff working document on significant distortions in the economy of the People's Republic of China for the purposes of trade defence investigations*,⁴² and the USTR's *2024 Report to Congress on China's WTO Compliance*.⁴³

Structural distortions in the PRC's economic system

96. Structural distortions to the PRC economy are systematic and fundamental. The PRC operates a socialist market economy, with the state influencing and interfering to distort the economy in non-market means. The concept of the socialist market economy is defined within the PRC constitution (Article 15)⁴⁴ and is the foundation of significant state interventions, with the supremacy of the state over private ownership defined. The provisions of the constitution and national law result in the presence of CCP figures within industry to control and influence across the PRC economy.
97. The use of SOEs as a vehicle for state policy is openly stated by official documents and public statements by both PRC state officials and SOEs highlighting how SOEs work to align with policy⁴⁵. SOEs within the PRC economy and steel sector receive greater levels of state support⁴⁶ as national priorities.
98. After the merger of two steelmaking SOEs in 2021 to create the world's third largest steelmaker by volume, Weng Jieming, vice-chairman of the SASAC stated: *"Giving full play to the rich mineral resource advantages of these two SOEs in both home and overseas markets, the move will reinforce China's ability in controlling strategic resources, as well as better ensuring the security of the steel industry and supply chains."*⁴⁷ While visiting a cold rolling mill in 2025, President Xi Jinping stated: *"The steel industry is an important basic industry of the country and the real economy is the foundation of the national economy."*⁴⁸ Tianjin Pipe Co., Ltd, a major SOE WTP producer, prominently

41 [TRA Investigations - Trade Remedies Service - GOV.UK](#) Accessed 30/03/2026.

42 [European Commission Trade Defence | significant distortions in the economy of the PRC](#) Accessed 09/02/2026.

43 [USTR | 2024 Congress on China WTO Compliance Report](#) Accessed 09/02/2026.

44 [Constitution of the People's Republic of China](#) Accessed 11/02/2026.

45 [Citic Pacific Special Steel | Extraordinary "14th Five-Year Plan", Create a special steel backbone for national rejuvenation with scientific and technological innovation](#) Accessed 11/02/2026.

46 [OECD Steel Outlook 2025 | Steel subsidies fuelling excess capacity](#) Accessed 11/02/2026.

47 [Ansteel | SOE's recast to create third-largest steelmaker](#) accessed 11/02/2026.

48 [State Council of the PRC | Xi stresses importance of steel industry, real economy](#) Accessed 11/02/2026.



features its cooperation and importance within centralised state planning initiatives such as the 14th Five-Year Plan within its company news section.⁴⁹

99. This demonstrates that PRC officials continue to focus on the steel industry as a strategic priority of the national economy and intend to provide it with ongoing state support. As the following sections show, this preference manifests in entities acting to support this national policy, regardless of natural commercial forces.
100. With industry - both SOEs and private companies - the CCP plays a strong role in directing the actions and priorities towards the policy goals of the Chinese state. The presence and influence of CCP figures within industry⁵⁰ is rooted in the Company Law of the PRC (Article 18⁵¹). The presence of such figures within related industries and sectors (in this case, within the wider steel industry and within the financial sector) gives companies favourable, non-market access to inputs and capital,⁵² and encourages entities in various sectors to act in accordance with broader national policy directives at odds with market norms.
101. SOEs feature heavily amongst the largest producers of WTP within the PRC. Some of the largest producers of WTP within the PRC – Tianjin Pipe⁵³, the Shougang group⁵⁴, the Baowu Group⁵⁵ – are SOEs directly or through subsidiaries. The presence of CCP party members on the boards⁵⁶ and throughout these enterprises increases the ability of the CCP and the state to influence these organisations.

Distortions in the financial, regulatory and legal systems

102. As noted, the WTP sector is dominated by SOEs. SOEs, particularly those within sectors politically important to the PRC such as the steel industry, enjoy various non-market benefits. The expectation that large steel enterprises are too politically sensitive to be allowed to fail means they are regarded with greater confidence for investment and finance access than market fundamentals would indicate⁵⁷. Unprofitable, often state-

49 [Citic Pacific Special Steel | Extraordinary "14th Five-Year Plan", Create a special steel backbone for national rejuvenation with scientific and technological innovation](#) Accessed 11/02/2026.

50 [Institut Montaigne | Influence without Ownership](#) Accessed 11/02/2026.

51 [PRC Government website | Company Law of the People's Republic of China](#) Accessed 10/02/2026.

52 [World Economic Forum | Explained, the role of China's state-owned companies](#) Accessed 11/02/2026.

53 [Tianjin Steel Pipe Group Co., Ltd](#) ("The company's leadership team was awarded the title of advanced collective of the "four good" leadership group of state-owned enterprises in the country.") Accessed 10/02/2026.

54 [Shougang Group](#) ("In 2023, the State-owned Assets Supervision and Administration Commission of the State Council (SASAC) announced its evaluation results of the "Double-hundred Enterprises" program, in which Shougang Group was rated "excellent.") Accessed 10/02/2026.

55 [China Baowu Group](#) ("China Baowu Steel Group Corporation Limited (hereinafter referred to as "China Baowu" or "Baowu"), headquartered in Shanghai, is an important backbone state-owned enterprise (SOE) directly administered by the central government, and the largest and most influential steel conglomerate in the world.") Accessed 10/02/2026.

56 [China Baowu Group – Board of Directors](#) Accessed 10/02/2026.

57 [Rhodium Group | Far From Normal: An Augmented Assessment of China's State Support](#) Accessed 11/02/2026.



owned firms have their debts rolled over and are allowed to continue in a “zombie” status⁵⁸. SOEs are noted as being particularly resilient to bankruptcies.⁵⁹

103. The same factors within the WTP and steel sectors delivering policy influence over the companies directly involved in those industries – the presence of CCP officials at senior levels, state ownership – also apply to the regulatory and financial bodies that would be expected to keep such practices in check. State-owned banks are also beholden to support state policy – article 34⁶⁰ of the ‘*Law of the People’s Republic of China on Commercial Banks*’, dictates that “*Commercial banks shall conduct their business of lending in accordance with the needs of the national economic and social development and **under the guidance of the industrial policies** of the State.*” (our emphasis). The law gives the power to supervise the implementation to the People’s Bank of China. The People’s Bank of China lacks central bank independence and operates under the direction of the CCP’s Central Financial Commission, itself an organ of the CCP central committee.

Distorted factors of production

104. The principal costs for WTP production are:
- Raw materials (principally steel)
 - Energy
 - Land
 - Labour
105. For each of these factors, a PMS within the PRC has been found in previous investigations by the TRA and other investigative bodies. Of these factors, raw materials in the form of Hot Rolled Coil (HRC) is overwhelmingly the most significant, accounting for ~90-95% of the cost of production of WTP⁶¹.
106. WTP is heavily influenced by the PMS and overcapacity⁶² surrounding its primary input, HRC steel, which has been previously found by various investigatory authorities, such as the EU⁶³. The OECD observed that between 2005 and 2022, 90% of steel firms were receiving some form of grant, concession, or below market borrowing for at least half of that period⁶⁴. Chapter 14 of the EC’s *Working Document on Significant Distortions in the Economy of the People’s Republic of China for the Purposes of Trade Defence Investigations*⁶⁵ focuses exclusively on the extensive distortions to this sector.

58 [Federal Reserve Bank of Dallas | China debt overhang leads to rising share of ‘zombie’ firms](#) Accessed 11/02/2026.

59 [Peterson Institute for International Economics | China Is Only Nibbling at the Problem of “Zombie” State-Owned Enterprises](#) Accessed 11/02/2026.

60 [Law of the People’s Republic of China on Commercial Banks](#) Accessed 11/02/2026.

61 [Steel Cost Model | Benchmarking | Welded Pipe Tube](#) Accessed 11/02/2026.

62 [OECD Steel Outlook 2025](#) Accessed 11/02/2026. ; [SSRN | Steel Overcapacity and the Global Trading System](#) Accessed 11/02/2026

63 [European Commission | Implementing regulation \(EU\) 2020/1408](#) Accessed 11/02/2026.

64 [OECD | The drivers and impacts of subsidies to steel firms](#) Accessed 09/02/2026.

65 [European Commission | Significant distortions in the economy of the PRC](#) Accessed 09/02/2026.

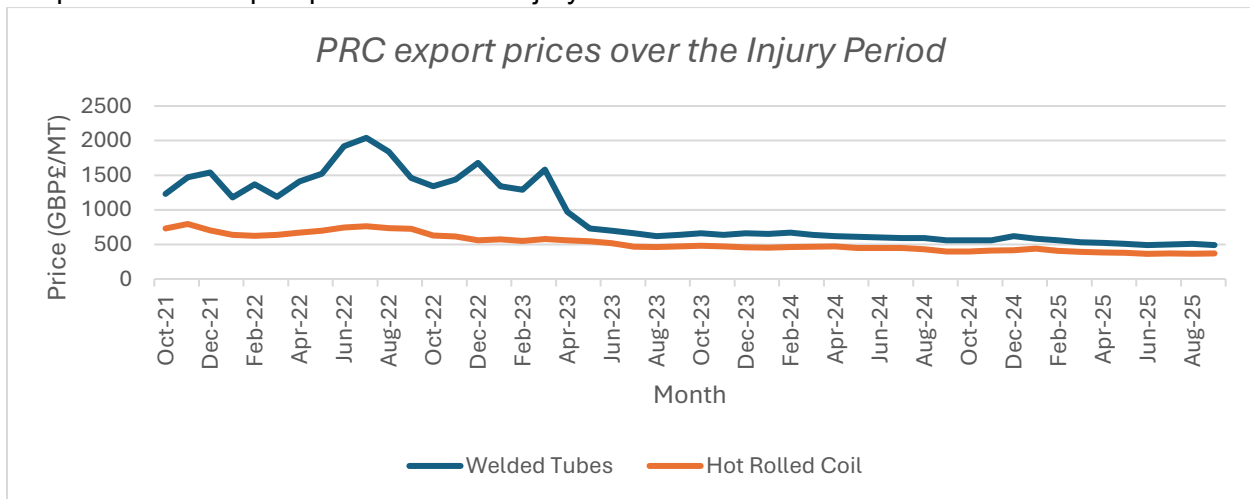


107. The relationship between the low costs and the competitiveness of PRC WTP is openly discussed by Chinese producers:

*“The competitive pricing of Chinese pipes, particularly against a backdrop of **moderated raw material costs** and efficient large-scale production, made them an attractive option for infrastructure and construction projects worldwide.”⁶⁶- DongPengBoDa Steel Pipe Group (our emphasis).*

108. Even before considering other factors, the extent of the non-commercial factors impacting HRC prices would be sufficient to justify the likelihood of a PMS in the WTP sector, due to the proportion of the total production costs that HRC constitutes. The close link between the price of welded tubes and that of HRC is such that when prices of welded tubes declined in early 2023, the price declined until it reached a floor just above the price of HRC, suggesting that this is the minimum price at which it is economical to turn HRC into welded pipes. From May-23 to the end of the POI, the price of welded tubes and HRC had a very strong correlation of 0.959, with welded tubes being on average 27% higher than that of HRC, as shown in Graph E1.

Graph E1: PRC export prices over the Injury Period



Source: Global Trade Tracker

109. A significant portion of the PRC’s energy production is state owned, and energy prices are controlled by the state.⁶⁷ The state can exert influence over these prices, as per the Pricing Law of the PRC, which can take the form of preferential prices.⁶⁸ This remains the

66 [DongPengBoDa Steel Pipe Group | China’s Welded Pipe Exports See Strong Growth in 2025: Driven by Price Competitiveness and Belt and Road Demand](#) Accessed 13/02/2026.

67 [PRC National Development and Reform Commission \(NDRC\) | Department of Price](#) Accessed 13/02/2026.

68 [Shanghai Metals Market | China to extend electricity price preferential policy to support company operations](#) Accessed 11/02/2026.



case, with the steel industry being noted as one of the energy-intensive industries that would benefit from pricing mechanisms.⁶⁹

110. The PRC's unique land ownership structures create notably greater opportunities for shaping the land price according to industrial policy objectives than other nations⁷⁰. Moreover, SOEs have been noted as receiving land use rights under favourable conditions or even for free or refunded costs.⁷¹ SOEs dominate both the WTP sector specifically but also the manufacturing of HRC, its most important input.
111. Labour costs in the PRC are distorted by structural non-commercial factors. A central issue is the lack of independent trade unions: the All-China Federation of Trade Unions (ACFTU) is the sole legally recognised union and is closely controlled by the CCP. Studies show that union leadership is dominated by CCP members and company managers.⁷² Combined with the PRC's non-ratification of core International Labour Organization (ILO) conventions on freedom of association and collective bargaining⁷³ this results in limited worker bargaining power and weak wage negotiation mechanisms.
112. A second major factor is the hukou household registration system,⁷⁴ which separates citizens into rural or urban categories and restricts rural workers' access to urban social services. This creates a large pool of "migrant workers" who accept lower wages in urban areas⁷⁵ and often work without formal contracts, reducing employers' labour costs.⁷⁶ Studies consistently show migrant workers earn significantly less than urban workers across similar roles. It should be noted in recent steel investigations, the TRA did not adjust PMS for labour costs.⁷⁷

Summary of PMS findings

113. The TRA sought information from relevant interested parties. As the TRA did not receive any information, it based its analysis on the best available facts based on its own research. Reviewing this information as above, the TRA finds on the balance of probabilities, it is likely that a PMS exists in the PRC with regards to WTP. No evidence was submitted or found indicating that the conditions of the WTP sector was likely to vary from the broader economy / steel sector wide non-commercial factors. This PMS likely reduces the costs of production for WTP within the PRC and suppresses the price / value

69 [China Briefing | China's Industrial Power Rates 2025: A Guide for Investors](#) Accessed 11/02/2026.

70 [Rhodium Group | Far From Normal: An Augmented Assessment of China's State Support](#) Accessed 11/02/2026.

71 [European Commission | Significant distortions in the economy of the PRC](#) Accessed 11/02/2026.

72 [International Labour Office | Global Labour University Working Paper No.13](#) Accessed 11/02/2026.

73 [International Labour Organization | Up-to-date Conventions not ratified by China](#) Accessed 11/02/2026.

74 [ORCASIA | HUKOU SYSTEM IN CHINA](#) Accessed 11/02/2026.

75 [MDPI | Hukou System Influencing the Structural, Institutional Inequalities in China: The Multifaceted Disadvantages Rural Hukou Holders Face](#) Accessed 11/02/2026.

76 [National Development and Reform Commission | Zhao Junjie: Review of the reform process of China's household registration system, reform valuation and trend judgement](#) Accessed 11/02/2026.

77 [TRA Investigations - Trade Remedies Service - GOV.UK](#) Accessed 30/03/2026.



of the like goods within the domestic market of the PRC and create an overcapacity of the like goods within the PRC.

114. The conditions that underpin this likely PMS are longstanding and fundamental, rooted in the constitution of the PRC and are unlikely to change. Therefore, the TRA deems it likely that the PMS will continue to exist in the future.

E3.1.3 Price analysis

115. The TRA did not receive any cooperation from producers of WTP within the PRC. When conducting its price analysis, the TRA sought data from various sources, prioritising sources such as HMRC and Global Trade Tracker (GTT) where possible. Where the TRA could not source data, it conducted a wider search for information. This information was used to perform a price analysis between an indicative normal value (INV) and an export price for the purpose of supporting the dumping likelihood decision.
116. The TRA looked at the prices within the PRC for WTP. The TRA gathered monthly data over the POI for welded steel pipe prices within the PRC from the start of each month within the POI from ChinaSteelMarket.com⁷⁸ in USD\$. These were then converted into GBP£ using the Bank of England’s database for the dates from which the prices were sampled to give prices in GBP£. These were averaged out to give an indicative price within the PRC for WTP over the course of the POI of £685.12.
117. This figure has significant issues that impact its use as the basis for a price comparison. In addition to the PMS outlined in Section E3.1.2 which would likely reduce domestic pricing, the price of goods within the PRC market is going to be further impacted by high levels of competition between PRC producers who are incentivised to sell at extremely competitive prices.
118. The TRA could not find information regarding domestic PRC prices over a longer timeframe.
119. PRC export prices to the global market have dramatically reduced over the IP. Graph E1: PRC export prices over the Injury Period (Section E3.1.3) shows that export prices were consistently between 1500-2000 £/MT, but since June 2023 fell to between 600-700 GBP£/MT. The exports of the year 2024/25 were only 35.39% of the GBP£ value in 2021/2022.

| Table E5: PRC export price over Injury Period and Period of Investigation | | | | |
|---|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Average Price (£) | 1514.17 | 1082.50 | 624.17 | 535.83 |
| Indexed | 100 | 71 | 41 | 35 |

Source: *Global Trade Tracker*

120. There were insufficient levels of exports to the UK to use HMRC data, so GTT data was used as the basis of the export prices. The average export price over the POI was £535.83.

78 [China Steel Market | Daily Welded Steel Pipe prices in China](#) Accessed 12/02/2026.



121. The indicative normal value found for PRC goods was £685.12. The PRC's export price to global markets is £535.83. Even without the likely PMS, this price analysis supports the conclusion that exports are being dumped into global markets. When the PMS is considered, the degree of dumping is likely significantly increased.
122. As such, the TRA concludes that the price analysis supports the likelihood of dumping recurring within the UK market.

E3.2 Assessment of ability to export dumped goods subject to review

E3.2.1 Ability to shift production to the goods subject to review

123. WTP is produced on production lines that can produce a significant range of other goods that are not within scope of this review. Only a limited portion of the total capacity for steel pipe production will be allocated to WTP, but capacity can usually be reallocated to WTP with minimal friction or issue. This is discussed in Section E2.3.4.
124. The TRA did not discover any indication of a PRC specific ability (or inability) to shift production to the goods subject to review from wider pipe production compared to other nations' production methods.
125. The TRA therefore concludes that PRC producers have no barrier to shifting capacity on their production lines for welded tubes to in scope WTP.

E3.2.2 Production capacity

126. The TRA has not received any submissions that provide information related to the production capacity of PRC producers of WTP. Therefore, we utilised the available data collected through open-source research and third-party information.
127. While there are statements that the PRC has constrained its capacity and production of WTP,⁷⁹ PRC capacity remains significant. The PRC has a well-documented overcapacity⁸⁰ in the steel sector, of which WTP are a part, that has remained in recent years. While the PRC's production of steel has plateaued in recent years at around 200 million MT,⁸¹ demand in the PRC has also fallen, meaning the gulf between PRC domestic consumption and production has increased.
128. With the steel pipe sector, the TRA found reports of increasing capacity:⁸²
- “The contradiction of oversupply in the steel tube industry is prominent. Steel tube production capacity has continued to increase in recent years, with an overall capacity utilization rate of **less than 70%**. Fierce homogeneous competition has led to an imbalance between input and output, resulting in a huge waste of resources.”* - Fushun Steel Tube Report (our emphasis).

79 [Carbon Brief | China Briefing 2 October 2025: China's new pledge](#) Accessed 02/02/2026.

80 [MEPS International | China's steel supply pressure persists despite production dip](#) Accessed 02/02/2026.

81 [OECD Steel Outlook 2025 \(EN\)](#) P.15 Accessed 02/02/2026.

82 [Hunan Fushun Metal Co., Ltd. | Steel Tube Industry High-Quality Development 2024-2025: Production Regulation & Self-Discipline](#) Accessed 02/02/2026.



129. The utilisation rate of <70% represents a significant fall in utilisation from figures of 81.14%⁸³ in 2020.
130. While much of the utilisation will not be for in-scope goods, as outlined in Section E3.2.1, the slack capacity could likely be used to produce the goods subject to review with very little issue should demand increase.

E3.2.3 Production levels

131. The TRA has not received any submissions that provide information related to the production levels of PRC producers of WTP. Therefore, we utilised the available data collected through open-source research and third-party information.
132. The Shanghai Steel Tube Industry Association (SSTA) market projection for 2025⁸⁴ stated that in 2024, exports (welded and seamless) had made up 12.27% of total steel pipe production, with 5.38 million tonnes of welded pipe being exported, which was deemed as 'effectively supporting the growth of production', with a total production of 90.4 million tonnes of steel pipe.
133. Fushun Steel Tube, a Chinese producer, indicates that national production levels of 'welded steel tubes' were 65.6 million tonnes⁸⁵ in 2023 and 60.5 million tonnes in 2024, against a long-term peak of 69.4 million tonnes in 2015.⁸⁶ In 2023 and 2024, the apparent domestic consumption was 61.4 and 55.3 million tonnes respectively. Fushun characterised the industry as having three highs and three lows: high capacity, high costs, high exports, low demand, low prices, and low benefits. The output of welded steel tubes in the PRC for Q1 of 2025 was 14 million tonnes, a 16.7% year-on-year increase⁸⁷.
134. According to the International Tube Association, in 2024 the PRC accounted for 55.73% of the total global tubes market, 53.63% of the total welded tubes market, and 56.03% of the welded tubes < 406mm diameter market. While this includes out-of-scope pipes, these figures indicate that the PRC accounts for an absolute majority of global WTP production.
135. For perspective, the UK market in the POI is approximately 67,000 tonnes. UK market analysis is conducted in Section F1. Using the figures from the SSTA of 5.38 million tonnes of welded tubes being exported, the PRC exports alone are sufficient to satisfy the entire UK market more than 80 times over. The TRA judges that this constitutes a significant level of production.

E3.2.4 Inventory

136. The TRA has not been able to find reasonable indicators of inventory. The Fushun report stated that Q1 of 2025 had been marked by 'a "four highs and two lows" pattern: high

83 [Landee Pipe | The Status of Development of Welded Pipes in China](#) Accessed 02/02/2026.

84 [Shanghai Steel Tube | Forecast of Steel Pipe Market in 2025](#) Accessed 02/02/2026.

85 [Hunan Fushun Metal Co., Ltd. | Steel Tube Industry High-Quality Development 2024-2025: Production Regulation & Self-Discipline](#) Accessed 02/02/2026.

86 [Huayang Steel Pipe | Development Of Welded Steel Pipe Output](#) Accessed 02/02/2026.

87 [Hunan Fushun Metal Co., Ltd. | Steel Tube Industry High-Quality Development 2024-2025: Production Regulation & Self-Discipline](#) Accessed 02/02/2026



output, high exports, **high inventory**, high costs, low prices, and low benefits.⁸⁸ (our emphasis) but did not further elaborate on the inventory aspect. Other sources indicate challenges faced by the wider steel pipe industry in destocking inventories.⁸⁹

137. The TRA therefore concludes that producers within the PRC are currently facing a period of high stocks and inventory, though no specific figures could be found.

E3.2.5 Conclusions on ability to export dumped goods subject to review

138. Exports are consistently cited as a critical part of the PRC's WTP industry model. Fushun noted in 2024 that the PRC's exports reached record volume while prices dropped,⁹⁰ and indicated that exports were an important pillar and support of the WTP industry, as did other entities such as the DongPengBoDa Steel Pipe Group,⁹¹ the Sindara Pipe Group,⁹² and the Shanghai Steel Tube Industry Association.⁹³

139. A consistent theme in PRC industry releases and media was noting the importance of these exports. DongPengBoDa stated:

*"In summary, the robust **export performance in 2025 served as the primary engine for China's welded pipe industry**. It successfully counterbalanced domestic headwinds, showcasing the sectors adaptability and global competitiveness. The demand was spearheaded by large-volume standard products like ERW carbon steel pipes and finished galvanized steel pipes, while specialized products including square and rectangular hollow sections and pre-galvanized pipes added depth and resilience to the export mix. This trend underscores a strategic shift where **international markets are increasingly vital for absorbing China's industrial output**, especially in segments facing cyclical domestic softness. The future outlook remains cautiously optimistic, contingent on maintaining price advantages and navigating evolving international trade dynamics."* (our emphasis).

140. The Shanghai Steel Tube Industry Association⁹⁴ stated:

*"While expanding domestic demand, it's crucial to stabilize external demand. In 2024, steel pipe exports were 11.1 million tonnes, including 5.72 million tonnes of seamless pipes and **5.38 million tonnes of welded pipes**, making up 12.27% of the total steel pipe production of 90.4 million tonnes, **effectively supporting the growth of production**."* (emphasis added).

88 [Hunan Fushun Metal Co., Ltd. | Steel Tube Industry High-Quality Development 2024-2025: Production Regulation & Self-Discipline](#) Accessed 11/02/2026

89 [Hunan Standard Steel | Latest update of China's seamless pipe market in 2025](#) Accessed 11/02/2026

90 [Hunan Fushun Metal Co., Ltd. | Steel Tube Industry High-Quality Development 2024-2025: Production Regulation & Self-Discipline](#) Accessed 02/02/2026

91 [DongPengBoDa Steel Pipe Group | China's Welded Pipe Exports See Strong Growth in 2025: Driven by Price Competitiveness and Belt and Road Demand](#) Accessed 11/02/2026

92 [China Sindara Steel Co.,Ltd | General Administration of Customs](#) Accessed 11/02/2026

93 [Shanghai Steel Tube | Forecast of Steel Pipe Market in 2025](#) Accessed 11/02/2026

94 [Shanghai Steel Tube | Forecast of Steel Pipe Market in 2025](#) Accessed 11/02/2026



141. The TRA therefore concludes, holistically reviewing this and the information collated in Sections E3.2.1-E3.2.4, that on the balance of probabilities it is likely that there is a significant capability to dump the goods subject to review from the PRC.

E3.3 Assessment of incentives to dump the goods subject to review to the UK

E3.3.1 Market prices in the UK and the overseas exporters market

142. Market prices within the PRC are discussed in depth in Sections E3.1.2 Particular Market Situation and E3.1.3. Price analysis.

| Table E6: Unit prices (GBP/MT) | |
|---|----------|
| PRC domestic price (see price analysis – lower than actual INV) | £685.12 |
| PRC export price | £535.83 |
| UK market average price | £800-850 |

Source: See Section E3.1.2 for PRC prices. UK: HMRC raw custom declarations data, Producer questionnaires.

143. The price of WTP within the UK is significantly higher than the domestic and the export price from the PRC. The PRC domestic price is 80-86% of the ranged average market price within the UK. Currently 64% of the UK market demand is met by imports, meaning there is market infrastructure already established for imports to reach consumers.

E3.3.2 4. Current and projected market conditions in third countries

144. As discussed in Section E3.2.1, steel pipe production can be easily shifted to WTP. Currently, at the six-digit level there are measures against steel pipes from the PRC in Australia⁹⁵, Canada⁹⁶, Thailand⁹⁷, Turkey⁹⁸, the European Union⁹⁹, and the United States¹⁰⁰ in addition to the United Kingdom. A further investigation is currently ongoing by Peru¹⁰¹. More broadly, the PRC's is subject to 397 measures against HS Section XV (Base metals and articles of base metal): 13% of all global measures currently in place.¹⁰² In the US case, anti-circumvention steps were required due to circumvention of the measure by the PRC via Oman (E3.3.5). These measures indicate that the PRC steel pipe industry has been dumping into other markets.

145. As outlined in Section E3.2.5, the PRC's WTP industry exports heavily and regards exports as a pillar of the industry, yet currently faces barriers in multiple major markets.

E3.3.3 Current and projected conditions in the overseas exporters domestic market

95 [WTO Trade Remedies Data Portal | ADC 550 AD 1 Investigation details](#) Accessed 13/02/2026

96 [WTO Trade Remedies Data Portal | AD/1373/CN Investigation details](#) Accessed 13/02/2026

97 [WTO Trade Remedies Data Portal | AD2016-05 Investigation details](#) Accessed 13/02/2026

98 [WTO Trade Remedies Data Portal | 221.CHN Investigation details](#) Accessed 13/02/2026

99 [WTO Trade Remedies Data Portal | AD523 CN Investigation details](#) Accessed 13/02/2026

100 [WTO Trade Remedies Data Portal | A-570-910 Investigation details](#) Accessed 13/02/2026

101 [WTO Trade Remedies Data Portal | Exp. N°24 2024 CHN Investigation details](#) Accessed 13/02/2026

102 [WTO Trade Remedies Data Portal | Antidumping measures](#) Accessed 16/02/2026



146. As detailed in Section E3.1.2, it is likely that a PMS exists within the domestic market of the PRC. This PMS creates non-commercial forces within the PRC's domestic WTP market, where depressed prices reflect non-commercial factors, such as state industrial policy.
147. Demand for WTP within the PRC has declined¹⁰³ within the IP, attributed to a slowdown in construction and infrastructure projects. This has been a consistent trend for several years, as noted by several reports and analysts within the PRC.¹⁰⁴ The steel pipe industry is facing significant challenges due to this slowdown, which is leading to slack capacity and high inventories as previously noted.
148. This has created conditions where exports are seen as critical to supporting the PRC industry because of this slackening in domestic consumption¹⁰⁵ and high levels of competitiveness. Due to the existence of overhead costs, to maintain production volumes, producers are strongly incentivised to look abroad: see Section E3.2.5 for examples of open discussion of the importance of exporting goods to maintain the industry.

E3.3.4 Current and projected conditions within the UK Market

149. The average prices within the UK market are higher than the domestic and export prices of the PRC (Section E3.3.1). The EU and USA, among others, also have measures in place against WTP from the PRC (Section E3.3.2), meaning that if the measure is allowed to expire, the UK will have a higher exposure relative to contemporaries.
150. During the POI, 64% of the UK's consumption of WTP was being met by imports – a 4% increase from the year prior. Therefore, market infrastructure already exists to enable a surge in dumped WTP from the PRC.
151. The UK market is mature and is not expected to significantly change in the coming years.

E3.3.5 Whether overseas exporters have previously or habitually circumvented or absorbed the effects of trade remedies

152. The TRA has not found evidence of the PRC WTP industry circumventing UK trade remedies.

E3.3.6 Conclusions on incentive to dump goods subject to review

153. The TRA reviewed the factors outlined in Sections E3.3.1 – E3.3.5 holistically and concluded that the evidence indicates strong incentives for PRC exporters to dump WTP in the UK if measures were allowed to expire. UK market prices are substantially higher than both PRC domestic and export prices, making the UK an attractive destination – especially as many other major markets (e.g., the EU, US, Canada, Australia, Turkey) already impose trade remedies on the same products.

103 [Hunan Fushun Metal Co., Ltd. | Steel Tube Industry High-Quality Development 2024-2025](#) Accessed 17/02/2026

104 [Mysteel | Analysis of China's welded pipe demand trend and outlook for changes](#) Accessed 17/02/2026

105 [DongPengBoDa Steel Pipes Group | China's Welded Pipe Exports See Strong Growth in 2025: Driven by Price Competitiveness and Belt and Road Demand](#) Accessed 17/02/2026



154. At the same time, the PRC domestic market shows signs of a PMS, with depressed prices, declining demand due to a slowdown in construction activity, and significant excess capacity. These conditions strongly incentivise PRC producers to rely on exports to maintain production volumes and cover overheads.
155. High UK prices and established import channels, suggests that if UK measures were removed, PRC exporters would be both willing and able to redirect exports to the UK, potentially at dumped or otherwise unfairly low prices.

E3.5 Any other relevant factors

156. The TRA sought information from relevant interested parties. The TRA received no indication or evidence of other relevant factors not discussed in the previous sections.

E3.6 Conclusion on the PRC dumping likelihood assessment

157. The TRA reviewed each factor when determining the likelihood of dumping for the PRC, should the measure expire without replacement. The TRA reviewed all factors outlined at the outset of Section E. Having done so, the TRA concluded that:
- a. It is likely that there is a PMS within the PRC with respect to WTP.
 - b. It is likely that the producers of WTP within the PRC have the ability to dump.
 - c. It is likely that the producers of WTP within the PRC have an incentive to dump.
158. The TRA therefore concludes dumping is likely to recur if the application of the anti-dumping duty were allowed to expire.

Section F: Injury likelihood assessment

159. In accordance with Regulation 70(6)(b) & (c), we will consider whether injury has been removed, or reduced, in whole or in part due to the application of the anti-dumping amount and whether the injury caused by the dumped goods would be likely to continue or recur if the application of an anti-dumping amount upon the goods subject to review were to expire (“the likelihood assessment”).
160. To conduct the injury likelihood assessment, we have considered:
- The current state of the UK industry;
 - Other major causes of injury;
 - Undercutting of the UK industry; and
 - Domestic and international market conditions.

F1 UK industry

161. In accordance with paragraph 6(1) of Schedule 4 to the Act, the UK industry is defined as:
- a) All the producers in the UK of like goods; or
 - b) Those of them whose collective output of like goods constitutes a major proportion of the total production of those goods in the UK.
162. The applicant for this review is the largest UK producer of the like goods, TSUK. We reviewed this application as well as open-source information to identify whether there were other UK producers of the like goods.
163. We identified another two UK producers of the goods, Marcegaglia (UK) Limited and Top Tubes Limited. We contacted both of them on initiation to make them aware of the expiry review and confirm whether they produced the like goods. Both companies confirmed they produced the like goods, however, did not have the capacity to participate in the review.
164. Therefore, TSUK was the sole participating UK producer of the like goods in this review. During the injury period its annual production of the goods represented a major proportion of the total production of those goods in the UK: publicly available information indicates that TSUK produces approximately 250,000 tonnes of steel tubes at its Corby site¹⁰⁶, while Marcegaglia has a stated capacity (not actual production) of 100,000 tonnes¹⁰⁷, and Top Tubes a capacity of 50,000 tonnes¹⁰⁸. Both Marcegaglia and Top Tubes advertise a focus on precision tubes.
165. As such, for the purposes of this review, we have determined TSUK to be the UK industry in accordance with paragraph 6(1)(b) of Schedule 4 to the Act.

F2 Volume Analysis

166. When determining whether the UK industry is suffering injury, the TRA has considered where there has been a significant increase of imports of the dumped goods into the UK

¹⁰⁶ [Corby | Tata Steel UK](#) Accessed 13/04/2026

¹⁰⁷ [Carbon Steel Welded Tubes - Marcegaglia UK](#) Accessed 13/04/2026

¹⁰⁸ [Steel Tubes Manufacturer | ERW Tube Suppliers UK](#) Accessed 13/04/2026



either in absolute terms (the volume of dumped goods being imported into the UK market) or relative to domestic production or consumption.

F2.1 Volume of like goods in absolute terms

167. The TRA assessed changes in the total volume of imports of the goods subject to review imported into the UK from Belarus and the PRC, using HMRC UK trade information and confidential HMRC raw customs declarations data, along with confidential UK producer questionnaire. The UK market constitutes the production of UK industry and imports of the like goods, as laid out in Section F1.

| Table F1: Volumes of imports of goods subject to review (GSR) (Indexed) | | | | |
|--|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Volume of goods subject to review from Belarus | - | - | - | - |
| Volume of goods subject to review from PRC | 100 | 317 | 73 | 2 |
| Total market | 100 | 79 | 76 | 71 |

Source: HMRC customs declarations data, Questionnaire responses.

168. The market was largest in 2021/2022 and shrunk to 71-79% of the original size afterwards. This can be attributed to a release of demand following the Covid-19 pandemic, meaning that the reference year for indexing is a relative high point in demand. The TRA considered the impacts of this Covid release during the injury factors analysis in Section F4.

169. Belarus' imports remained consistent at nil throughout the Injury Period and POI.

170. The volume of goods imported from the PRC varied significantly, as the low initial volume meant that relatively small increases caused large variations. The PRC levels reached higher levels in 2022/2023, the only year for which the imports could be considered significant.

F2.2 Volume of imports of goods subject to review relative to UK production

171. The indexed volume of goods subject to review imported into the UK from Belarus and the PRC relative to domestic production is as follows:

| Table F2: Volume of imports of GSR relative to UK production (Indexed) | | | | |
|---|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| UK production for domestic use | 100 | 87 | 91 | 76 |
| Belarus imports as a % of UK production for domestic use | - | - | - | - |
| PRC imports as a % of UK production for domestic use | 100 | 364 | 80 | 2 |

Source: HMRC raw customs declarations data, Questionnaire responses.

172. PRC imports were a small proportion of UK production for domestic use and fell to only 2% of its original volume. This import volume is not significant.

F2.3 Volume of imports of goods subject to review relative to UK consumption



173. Domestic consumption was calculated by combining HMRC import data and the volumes produced by the UK industry for domestic consumption.

| Table F3: Volume of imports of GSR relative to UK consumption (Indexed) | | | | |
|--|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Belarus import market share | - | - | - | - |
| PRC import market share | 100 | 402 | 96 | 2 |
| UK industry market share | 100 | 110 | 120 | 107 |
| Total market | 100 | 79 | 76 | 71 |

Source: HMRC raw customs declarations data, Questionnaire responses.

174. The UK market contracted slightly from its original size at the start of the IP, meaning that while overall production volume of the UK industry was down, its relative position within the market increased slightly.

175. As PRC market share was also low and reduced significantly in the POI after peaking in 2022/2023. The PRC market share is currently not considered by the TRA to be significant.

F2.4 Likelihood of significant import volumes to recur should the measure expire without replacement.

176. In Section E, the TRA reviewed the likelihood that dumping would recur if the measure were to expire without replacement. When considering injury, the TRA only considers whether a significant volume of imports would recur, not whether these goods would be dumped.

177. In Section E2 the TRA considered Belarus, and in Section E3 the TRA considered the PRC. Both Belarus and the PRC were found to be likely to resume dumping.

The factors reviewed relevant to the ability to export significant volumes were:

- Production levels;
- Production capacity;
- Inventories; and
- Ability to shift production to WTP.

The factors reviewed relevant to the incentive to export significant volumes were:

- Prices within Belarus/the PRC and the UK;
- Exports to third countries;
- Conditions in domestic Belarus/PRC market;
- Attractiveness of the UK market; and
- Historic circumvention of trade remedies.

The same factors which would indicate a higher likelihood of dumping also mean there is a higher likelihood of significant volumes of imports.

178. The TRA therefore concludes that should the measure expire without replacement, significant volumes of imports from both Belarus and the PRC would be likely.

F3 Price analysis

179. In accordance with regulation 32 of the Regulations, to assess the effect of the dumped goods on prices of the like goods in the UK during the injury period, the TRA has considered whether:
- there has been significant price undercutting by the dumped goods as compared with the price of the like goods produced in the UK; or
 - the dumped goods have depressed or suppressed domestic prices of the like goods produced in the UK to a significant degree.

F3.1 Sufficiency of imports of the goods subject to review for price effect analysis

180. When considering the impacts or likely impacts of imports upon prices, the TRA first assesses whether the imports continued over the IP at sufficient levels to perform an analysis on actual impacts.
181. As stated, WTP imports from Belarus and the PRC were very low over the course of the IP. Belarus (E2.3) imports were nil for the entire duration of the IP. PRC (Section E3.2.1) imports were low for all years, with a peak in 2022/2023. This singular year of notable imports is not sufficient to perform a suitable analysis of any continuing price undercutting by actual imports of dumped goods.
182. As such, the TRA will consider the likelihood of significant price undercutting recurring should the measure expire without replacement.

F3.2 Likelihood of significant price undercutting

183. Price undercutting occurs when the overseas exporters' goods subject to review are consistently priced lower than the UK like goods. To assess whether there was any evidence of price undercutting, we examined changes to domestic sales prices and changes to the cost of production for the like goods produced in the UK during the IP. The same factors reviewed in Sections E2 and E3 that indicated an ability and incentive to dump also indicate an increased likelihood that exports to the UK would be at a price that undercuts the UK market average price.
184. The Belarus price used will be the constructed export price (Section E2.3) within the POI: £550.26.
185. The PRC price used will be the export price (Section E3.1.3) within the POI: £535.83
186. In both cases, this is before any adjustments due to PMS or other distortive factors.

| Table F4: Unit prices (GBP/MT) | |
|--|----------|
| Belarus constructed export price. | £550.26 |
| PRC export price | £535.83 |
| UK market average price | £800-850 |
| Belarus export price as a % of UK market average | 65-69% |
| PRC export price as a % of UK market average | 63-67% |
| Belarus likely undercutting rate | 31-35% |
| PRC likely undercutting rate | 33-37% |

187. The TRA therefore concludes significant price undercutting will likely recur should the measure expire without replacement.

F4 Economic factors analysis

188. In considering the impact of the dumped goods on the UK industry, the TRA has taken into account relevant economic factors and indices having a bearing on the UK industry, including:
- actual and potential decline in sales, output, market share, productivity, return on investments, and utilisation of capacity;
 - factors affecting domestic prices of the like goods;
 - the magnitude of the margin of dumping;
 - actual and potential negative effects on cash flow, inventories, employment, wages, growth, the ability to raise capital or investments.

F4.1 Sales

189. The TRA assessed the changes in the volume and the value of the UK industry's sales during the IP.
190. During verification, UK industry indicated to the TRA that the 2021/2022 year was peak in demand and price for WTP, attributing this to a "Covid release" as demand issues caused by pandemic era backlogs and issues resolved. This aligns with the trends seen in export prices from other countries (See Table F4), where there was a universal peak in export price from every measured exporter in 2021/2022, and in the UK market size (Table F2). The impact of this Covid release in the first year of the IP manifests in many of the economic factors.
191. There has been a decrease in sales volume and value over the course of the IP for both domestic and export sales. There is variance between decrease for the value and volume in both cases, with a decrease of 48% for domestic sales value, 24% for domestic sales volume, 24% for export sales volume, and 45% for export sales value. Except for the initial drop from the Covid release, domestic sales value continued to decrease in each year.

| Table F5: UK industry domestic sales, by volume and value (Indexed) | | | | |
|--|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Domestic sales volume | 100 | 87 | 91 | 76 |
| Domestic sales value | 100 | 78 | 70 | 52 |

Source: Questionnaire responses.

| Table F6: UK industry export sales, by volume and value (Indexed) | | | | |
|--|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Export sales volume | 100 | 74 | 76 | 76 |
| Export sales value | 100 | 76 | 62 | 55 |

Source: Questionnaire responses.

192. Table F6 shows export volume remained relatively consistent, excepting the peak in 2021/2022, though value has dropped.
193. Overall, sales volume and value both saw decreases over the course of the IP, even excepting for the Covid release.



F4.2 Output

194. Output by volume and value have both followed a consistent negative trend throughout the IP, with the most significant annual drop being, as expected, after the initial Covid release. As with sales, value dropped further than faster than volume, as the price of WTP within the UK market declined.

| Table F7: UK industry output, by volume and value (Indexed) | | | | |
|--|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Output by volume | 100 | 84 | 88 | 76 |
| Output by value | 100 | 78 | 68 | 52 |

Source: Questionnaire responses.

F4.3 Capacity

195. The production capacity of UK industry has remained consistent over the past four years, with a slight decline in 2024/25.

196. Capacity utilisation has declined over the IP. Once the expected decline between the Covid release and 2022/2023 is accounted for, the utilisation remains steady for the remainder of the IP.

| Table F8: UK industry capacity and utilisation (Indexed) | | | | |
|---|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Production capacity | 100 | 100 | 100 | 95 |
| Production capacity utilisation | 100 | 84 | 88 | 80 |

Source: Questionnaire responses.

F4.4 Stock levels

197. Due to the manufacturing process for WTP, goods can move in and out of scope at various points along the production process. Goods may be produced at scale within scope, held in stock while an in-scope product, then upon receiving an order are then finished and sold out of scope. This explains why the trends for stock are notably different to other economic factors.

| Table F9: UK industry stock levels, by volume and value (Indexed) | | | | |
|--|---------|---------|---------|---------|
| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
| Volume | 100 | 86 | 116 | 83 |
| Value | 100 | 114 | 147 | 89 |

198. In this context, stock levels of goods, that are currently within scope, have declined over four years, with a brief resurgence in 2023/24 to peak levels, then a decline in 2024/2025.

199. The value of the stock grew in the first three years, before a decline in 2024/25. The volume varied to a greater degree, declining, increasing, and declining again, ending the IP at 83% of the previous level.

F4.5 Market share

200. The UK industry's market share has increased over the IP, ending the IP 7% higher than its starting point, even while the overall market size declined.



Table F10: Market size and shares (Indexed)

| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
|--------------------------|---------|---------|---------|---------|
| Total Market | 100 | 79 | 76 | 71 |
| UK industry market share | 100 | 110 | 120 | 107 |

Source: HMRC customs declarations data, Questionnaire responses.

201. UK market share has settled slightly above the start point and has fluctuated to a slight degree over the course of the IP. Given the larger shrinkage in the market size, in practical terms UK industry has a larger portion of a smaller whole.

F4.6 Productivity, employment and wages

202. Employment figures dropped between 2021/2022 and 2022/2023, but have remained consistent since then. In the application, the applicant noted that, despite the positive effects of the measure, imports along with other factors resulted in it having to lay off workers:¹⁰⁹ this explains the drop in 2022/2023.

203. Productivity increased in the first three years of the IP, driven by the drop in employees rather than an increase in output. As output continued to decline, productivity also fell.

204. The median wage did increase over the course of the IP, driven by pay rises and cuts to junior members of the workforce. This means that while the economic factor of median wage is improving, that improvement is being partially driven by job losses and unemployment as FTE numbers drop.

Table F11: UK industry employment and productivity figures (Indexed)

| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
|---|---------|---------|---------|---------|
| FTE for like goods | 100 | 83 | 82 | 82 |
| Average output in volume per FTE for like goods | 100 | 102 | 107 | 93 |
| Median wage for FTE engaged in activities related to the like goods | 100 | 105 | 114 | 113 |

Source: Questionnaire responses.

F4.7 Growth, investment, cash flow and ROI

205. As highlighted below, UK industry has seen little growth in terms of fixed assets over the four-year period. Meanwhile, cashflow and ROI have fallen significantly. This is likely related to the increase in production costs and the lack of flexibility in capacity. Whilst UK industry has the option to utilise less of its capacity, there is still a significant cost attached to maintaining all facilities, reflecting reflects the fragility of the UK industry.

Table F12: Growth, investment, cash flow, and ROI

| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 |
|------------------|---------|---------|---------|---------|
| Fixed asset base | 100 | 101 | 100 | 100 |

Source: Questionnaire responses.

206. UK industry was not able to provide figures for like goods only cashflow and ROI and was only able to provide company-wide figures. Given that the like goods only constitute a

109 [TRA Investigations - Trade Remedies Service - GOV.UK](#) Accessed 26/03/2026



portion of the wider company's activities, no meaningful conclusion can be drawn from the company wide figures.

F4.8 Summary of impact of dumped goods on UK industry

207. The TRA acknowledges that the trend between the first year of the IP and the POI in some economic factors is impacted by the unusual market circumstances of the Covid release in the initial year and considered this when reviewing during the economic factors analysis.
208. The economic factors show vulnerability remains within UK industry to injury from imports. Only one indicator showed a mildly positive trend:
- Market share showed an uptick over the IP, but this was only a slight increase (7%) and comes in the face of a shrinking or stagnant overall market size.

Most indicators were slightly negative or neutral:

- Domestic volume and value showed large decreases.
- Capacity utilisation, Employee productivity, and FTE all showed slight decreases.
- Stock levels, asset base, total capacity, and wages showed no notable trends.

Profit and cost were not considered due to a lack of non-confidential data. The margin of dumping was also not considered as we did not find it appropriate to recalculate any dumping margins during this review. The holistic view of the other economic factors was sufficient to support the conclusion.

209. An objective examination of the economic factors considered above demonstrates that UK industry remains in a stressed situation, albeit not in a situation of active decline. UK industry has had to reduce its workforce to maintain productivity, and capacity utilisation remains low. Only a single economic factor – market share – showed a positive trend, which was offset by the overall shrinkage in the UK market.

F5 Conclusion on likelihood of injury assessment

210. The TRA concludes that UK industry is still vulnerable to dumping. While the current measure has prevented injury in part due to the application of the anti-dumping amount, should dumping of the goods subject to review recur, it is likely that significant undercutting would cause significant injury to the UK industry.

Section G: Economic interest test

G1 Introduction

G1.1 Legislative framework

211. This EIT is conducted in accordance with paragraph 25 of Schedule 4 to the Act and the Secretary of State's Statutory Guidance on how the TRA should apply the EIT. In expiry reviews the TRA can consider the EIT we conducted during the original investigation and assess data and evidence on the economic impact of the measures since they have been applied.
212. In accordance with Regulations 70(12) and 75(2E) of the Regulations, the TRA must conduct the EIT and advise the Secretary of State whether and why the extension of the measure meets the test.
213. For anti-dumping and countervailing measures, the EIT is **presumed to be met** unless the evidence demonstrates that continuation of the measure is not in the economic interest of the UK.
214. In line with paragraph 25(4) of Schedule 4 to the Act, we have taken account of the following factors in conducting the EIT:
- the injury caused by the dumping of the goods to a UK industry in the goods and the benefits to that UK industry in removing that injury;
 - the economic significance of affected industries and consumers in the UK;
 - the likely impact on affected industries and consumers in the UK;
 - the likely impact on particular geographic areas, or particular groups, in the UK;
 - the likely consequences for the competitive environment, and for the structure of markets for goods, in the UK; and
 - such other matters as the TRA considers relevant.

G1.2 Evidence base

215. We received a questionnaire response from:
- TSUK.
216. [Section F1](#) above provides an overview of the current UK industry structure and key producers. Our previous review, TD0001, determined that the UK industry consisted of two domestic producers: TSUK and Liberty Steel UK. In this review, Liberty Steel is no longer a producer of the like goods, as defined in the description of the goods. We have evidence that Marcegaglia, Top Tubes, and TSUK are producers of the like goods.

G2 Injury caused to UK industry and the benefits of removing that injury

G2.1 Previous findings

217. In TD0001, the injury likelihood assessment concluded there would be further injury to UK industry if measures were revoked. This was due to the vulnerability of the UK industry and the likelihood of future undercutting.

G2.2 Current assessment

218. As noted in Section G1.2, the composition of the UK industry has changed since the last review. However, there is no evidence of significant material changes since our previous assessment, and the industry's vulnerabilities remain.

219. The latest injury likelihood assessment ([Section F](#)) finds that, in the absence of the current measures, dumping would likely recur, leading to price undercutting and a recurrence of injury to the UK industry. The measures therefore remain relevant to protect UK industry from the likelihood of recurring injury from WTP imports from Belarus and the PRC.

G3 Economic significance of affected industries and consumers in the UK

G3.1 Previous findings

220. UK producers were found to be vertically integrated with upstream producers and WTP was found to be a significant product for both groups. UK producers employed around 600 people and had been experiencing poor profitability since 2017.

221. For importers, distributors and downstream businesses, WTP was assessed as not very significant for their overall operations, as these businesses trade in a wide range of other products. Finally, as WTP is not a consumer product, any indirect impacts on consumers were considered negligible.

G3.2 Current assessment

222. Based on the available evidence, the structure of the supply chain remains broadly unchanged, although there have been minor changes in the number of market participants within certain stakeholder groups. One upstream business and three producers continue to operate in the UK market. The downstream remains large and dispersed, consisting mainly of distributors and stockists that source WTP from both domestic and international suppliers.

223. From our assessment and the information provided in TSUK's response, WTP production in the UK remains very important to the upstream and UK producers. We received no submissions from importers or the downstream.

224. Therefore, we consider our previous findings remain relevant and accurately reflect the current economic significance of the affected industries and consumers in the UK.

G4 The likely impact on affected industries and consumers in the UK

G4.1 Previous findings



225. Our previous analysis found that upstream businesses and UK producers were likely to benefit from extending the measures due to their sales and prices of WTP being unlikely to change. Downstream businesses, distributors and importers were likely to experience no significant changes to prices and quantities from extending the measures resulting in limited impacts.
226. However, if the measures were revoked, overall demand for WTP was expected to remain stable, but lower-priced imports could increase competition, potentially leading to negative impacts on upstream businesses and UK producers. While some importers may benefit from lower priced imports, downstream businesses and consumers were likely to experience limited impacts due to the extent that lower prices passed through the supply chain. We did not obtain evidence that allowed us to assess the potential impacts in more detail.

G4.2 Current assessment

227. The evidence available suggests that market conditions have not changed significantly in recent years and there is no indication of short-term shifts in demand or preferences. Demand continues to be driven by sector specific technical requirements (e.g. for data centres and tall buildings) and wider macro-economic conditions, resulting in WTP accounting for only a small share of the total cost of downstream and finished products.
228. Consequently, while the current measures benefit upstream businesses and UK producers by preventing the likelihood of injury recurring. The overall impact on downstream businesses, importers and consumers continues to be likely limited (no responses were received from these stakeholders).
229. Therefore, we consider the findings of our previous assessment of the likely impacts on affected industries and consumers remain relevant for our current economic assessment of future scenarios.
230. It is important to note that WTP imports from Belarus are currently subject to sanctions (see [Section E2.1](#)), meaning the measures are likely having a limited impact at present. However, they could have a greater impact if those sanctions were removed in the future.

G5 The likely impact on particular geographic areas, or particular groups in the UK

G5.1 Previous findings

231. The TD0001 assessment found that the likely geographic impacts of varying the measure were uncertain, because it was unclear whether all employment in some areas was linked to WTP production. However, if the measures were revoked, Neath Port Talbot and Corby were most likely to be negatively impacted as employment represented greater than 1% of total employment for those areas.
232. As these areas were economically disadvantaged, any job losses at domestic producers and upstream businesses located there would likely have negative multiplier effects for the steel supply chain and wider local communities. We found downstream users and

consumers were geographically dispersed across the UK and there was no evidence of impacts on geographic areas for these groups.

233. There was no evidence to indicate any obvious likely impacts on particular groups from extending the measures.

G5.2 Current assessment

234. Our previous assessment has been updated to include the geographic locations of the two additional producers in the Dudley and Wednesbury Travel to Work Areas (TTWA) and to exclude the location of Liberty, which no longer produces the like goods. However, having reviewed the available evidence on current employment linked to WTP, it is unlikely that employment numbers will be significantly impacted by the extension or expiration of the current measures. As such, extending the measures is unlikely to have a significant impact on any geographic areas.
235. The evidence also suggests that the measures are unlikely to have any significant impact on particular groups or those with protected characteristics.

Further to the Public Sector Equality Duty, when the TRA carries out its functions, including making determinations and recommendations, it must have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act;
- advance equality of opportunity between people who share and people who do not share a relevant protected characteristic; and
- foster good relations between people who share and people who do not share a relevant protected characteristic.

The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

Having had due regard the TRA considers that the proposed determination does not have an impact on the three aims of the duty.

G6 The likely consequences for the competitive environment and for the structure of markets for goods in the UK

G6.1 Previous findings

236. We determined that extending the measures would not significantly impact the number and range of suppliers. Also, we found no evidence to suggest that the ability of suppliers to compete, incentives to compete vigorously, or the choices and information available to consumers would be impacted. However, revoking the measures would be likely to increase the number and range of suppliers from countries currently subject to measures.

G6.2 Current assessment

237. The UK WTP market is supplied by three domestic producers and a range of overseas suppliers from over 40 countries. Market shares remain well distributed, with UK suppliers maintaining their share since the last review. The existing measures continue to limit imports from Belarus and the PRC, and based on the available evidence, there has been no material change in the number or range of suppliers, the ability of suppliers to compete, incentives to compete vigorously, or the choices and information available to consumers.
238. Downstream businesses continue to have access to a range of international suppliers, supporting continued competition in the market despite the existing measures.
239. Therefore, we consider our previous findings remain relevant and reflective of the current competitive environment in the market.

G7 Other relevant factors

G7.1 Previous findings

As no evidence was received or emerged in the course of the investigation, we did not consider any other relevant factors during the transition review.

G7.2 Current assessment

240. We did not find any evidence that indicates there are any other factors relevant in concluding whether extending the measure is in the economic interest of the UK.

G8 Form of measure

241. The current measures are anti-dumping duties of 38.1% for all companies from Belarus, and 90.6% for all companies from the PRC.
242. We found no evidence suggesting that an alternative form of measure would be more appropriate than the initial variation which was recommended, particularly in the absence of compelling evidence to support a recalculation of dumping margins.

G9 Conclusion

243. In accordance with paragraph 25 of Schedule 4 to the Act, the EIT is met in relation to the application of an anti-dumping remedy, if the application of the remedy is in the economic interest of the UK.
244. We have taken account of our previous findings from TD0001 and the prevailing market conditions in respect of the goods subject to review. Extending the measure would have the following positive impacts:
- The measure is likely to benefit UK producers of WTP and vertically integrated upstream producers by reducing the risk of injury recurring from dumped imports that could re-enter the market if the measure were allowed to expire.
 - It would help preserve the existing market conditions that have supported a stable UK industry, while enabling businesses to continue their planned investments.
245. The key negative impacts are:



- Extending the measure would mean that importers and downstream businesses who source WTP from the PRC and Belarus continue to face higher costs.
246. Having considered the evidence submitted by interested parties and all of the factors listed in the legislation, the TRA does not consider that the negative impacts are disproportionate to the need to prevent injury recurring. Therefore, pursuant to Regulation 75(2E) of the Regulations, the TRA advises the Secretary of State that the TRA considers that the extension of the measure, in accordance with our intended final recommendation, meets the EIT.

Section H: Intended final recommendation

247. We have found that it is likely, on the balance of probabilities, that dumping of the goods subject to review into the UK from Belarus is likely to recur if the application of the anti-dumping amount were to expire (see [Section E2 Belarus](#)).
248. We have found that it is likely, on the balance of probabilities, that dumping of the goods subject to review into the UK from the PRC is likely to recur if the application of the anti-dumping amount were to expire (see [Section E3 the PRC](#)).
249. It is also likely, on the balance of probabilities, that injury to UK industry caused by dumped goods is likely to recur, if the application of the anti-dumping amount were to expire (see [Section F Injury likelihood assessment](#)).
250. The TRA considers that the proposed extension of the measure in accordance with our intended final recommendations meets the EIT, as per Regulation 75(2E) of the Regulations (see [Section G EIT](#)).

H1 Intended final recommendation

251. The TRA's intended final recommendation to the Secretary of State that the period of the application of the anti-dumping amounts to the goods subject to review should be extended, pursuant to regulation 75(1)(c) and 75(2E) of the Regulations, so that it applies to the goods subject to review imported into the UK until 30 January 2031. This date is, five years subsequent to the date when the measure would have expired (30 January 2026) had no expiry review been initiated (see [Taxation Notice 2023/09](#)).
252. No information was received to lead us to consider that it was appropriate to amend the level of the anti-dumping amounts. Therefore, we intend to recommend to the Secretary of State that the anti-dumping amounts for all the goods subject to review remain unchanged, pursuant to regulation 70(2)(a) of the Regulations, at the rates set out below:

| Overseas exporter/producer | Duty amount (%) |
|---|------------------------|
| All other overseas exporters from Belarus (residual amount) | 38.1% |
| All other overseas exporters the PRC (residual amount) | 90.6% |

253. The description of the goods to which the measures applies (that is, the goods subject to review) is set out in [Section D The goods](#). We have not considered it necessary to vary the goods subject to review or the description of those goods, nor have we received any comments or indications that we should consider doing so.
254. We intend to make this recommendation based on the conclusions we have reached, as summarised above.

Annex A: Interested parties and contributors

255. Table AA1 below lists the information submitted to the TRA by interested parties and contributors to date.

| Table AA1: Summary of submissions on the public file received from Interested parties and contributors | | | |
|---|---|--|--------------------------|
| No. | Interested party name | Information received | Status |
| 1. | TATA Steel UK (TSUK) | Application | Applicant / UK Producer |
| 2. | EEF Limited (UK Steel) | Registration Form | UK Trade Body |
| 3. | Ministry of Commerce of the People's Republic of China (MOFCOM) | Registration Form | Foreign Government (PRC) |
| 4. | MARCEGAGLIA (UK) LIMITED (Marcegaglia) | Registration Form | UK Producer |
| 5. | TATA Steel UK (TSUK) | Questionnaire Response | Applicant / UK Producer |