



# Statement of Essential Facts

REVIEW No. ER0082

Expiry review into Wire Rod originating from the People's Republic of China

[16 June 2026]



## Contents

<b>Section A: Introduction</b> .....	3
<b>Section B: Summary and findings</b> .....	5
<b>Section C: Background</b> .....	7
<b>Section D: The goods</b> .....	8
<b>Section E: Dumping likelihood assessment</b> .....	10
<b>Section F: Injury likelihood assessment</b> .....	35
<b>Section G: Economic interest test</b> .....	49
<b>Section H: Intended final recommendation</b> .....	55
<b>Annex A: Interested parties</b> .....	56



## Section A: Introduction

### A1 Review

1. On 10 November 2022, the TRA published its final determination for TD0007: Wire Rod products originating in the People's Republic of China (PRC)<sup>1</sup>. On 10 November 2022, the Secretary of State for Business and Trade (Secretary of State) published a public notice giving effect to the recommendation by the TRA to vary the anti-dumping duty on wire rod so that the measure applied until 30 January 2026.<sup>2</sup>
2. On 28 January 2026, following an application by 7 Steel (UK) Limited, the TRA published its Notice of Initiation<sup>3</sup> to initiate an expiry review on wire rod products.
3. Trade Remedies Notice 2026/05<sup>4</sup> confirmed the application of the anti-dumping measure relating to wire rod products from the PRC would continue during the review, pursuant to Regulation 70(9) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019<sup>5</sup> ("the Regulations"). The anti-dumping amount which applies to the goods subject to this expiry review will continue until we make a determination that the application of the relevant anti-dumping amount 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)

4. This SEF is made pursuant to Regulation 62<sup>6</sup> of the Regulations. It includes:
  - the determination that the TRA intends to make;
  - a summary of the facts considered during the review;
  - facts set out in the Summary of the Facts Considered that form 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 determination; and
  - details of the analysis forming the basis of the intended determination.
5. This SEF should be read in conjunction with other public documents available for this case, which are on the [public file](#).

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<sup>1</sup> [Trade Remedies Service | TD0007 Final Determination](#)

<sup>2</sup> [Trade remedies notice 2022/07: anti-dumping duty on wire rod products originating in the Peoples' Republic of China](#)

<sup>3</sup> [Trade Remedies Service | ER0082 Notice of Initiation](#)

<sup>4</sup> [Trade remedies notice 2026/05: anti-dumping duty on wire rod products originating from China](#)

<sup>5</sup> [The Trade Remedies \(Dumping and Subsidisation\) \(EU Exit\) Regulations 2019](#)

<sup>6</sup> 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. In this case the TRA considered that it was appropriate to publish a statement of essential facts.



6. 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 (UK time) on **16 July 2026**.
7. 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 rejections in the final determination.
8. 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 [ER0082@traderemedies.gov.uk](mailto:ER0082@traderemedies.gov.uk).
9. 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', setting out the reasons why we should treat the information as confidential and why summarisation of the information is not possible.
10. For further information about our reviews, please see our [public guidance](#).

### **A3 Period of investigation and injury period**

11. The period of investigation (POI) is 01 October 2024 to 30 September 2025.
12. To assess 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

13. 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.
14. We concluded 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 E](#)).

### B2 Injury likelihood assessment

15. In accordance with Regulation 70(6)(b), the TRA has considered if injury to UK industry 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 also 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.
16. 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)

17. 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.
18. 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.
19. The TRA considers that the proposed extension of the measure in accordance with our intended final determination meets the EIT, as per Regulation 75(2E) of the Regulations (see [Section G EIT](#)).



## B4 Intended final determination

20. The TRA’s intended final determination is that the application of the anti-dumping duties to the goods subject to review should be extended, pursuant to Regulation 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. In reaching this conclusion, the TRA has had regard to the current and prospective impact of the anti-dumping amount. No information was received to lead us to consider that it was appropriate to amend the level of the anti-dumping amounts.
21. 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.
22. The relevant duty amounts are specified in Trade Remedies Notice 2022/07, and repeated below:

<b>Table 1: Recommended ad-valorem duty rates</b>	
<b>Overseas exporter</b>	<b>Duty amount (%)</b>
Valin Group	7.9%
All other overseas exporters from the PRC (residual amount)	24.0%

23. The description of the goods to which the measures applies is set out in [Section D The goods](#). We considered 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.
24. We intend to make this recommendation based on the conclusions we have reached, as summarised in Section B1, B2 and B3 above.



## Section C: Background

### C1 Participation in the review

25. 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

26. The TRA undertook verification activities in relation to the information provided by the applicant, 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.
27. We conducted onsite verification with the applicant to this review, 7Steel (UK), between 21 and 23 April 2026. The verification report for that visit is available in a non-confidential format on the [public file](#).
28. We have included the data provided by British Steel in its questionnaire response in the analysis. We have tested the accuracy of that data by comparing it against the data from 7Steel (UK), and have found the trends follow similar trajectories and are consistent with each other. This analysis is set out in more detail in [Section F: Injury Likelihood Assessment](#).
29. Secondary source information was used in accordance with the Regulations. This secondary information was also 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

30. 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]”.

31. The goods subject to review in this expiry review are wire rod products imported into the UK from the PRC, described in the Notice of Initiation<sup>7</sup> as:

*Bars and rods, hot-rolled, in irregularly wound coils, of iron, non-alloy steel or alloy steel other than of stainless-steel originating in the People’s Republic of China.*

32. The goods subject to review are subject to the following commodity codes, which are subject to change and are only provided for information. No changes have been identified since the completion of TD0007:

• 7213 10 00	• 7213 91 49	• 7227 10 00
• 7213 20 00	• 7213 91 70	• 7227 20 00
• 7213 91 10	• 7213 91 90	• 7227 90 10
• 7213 91 20	• 7213 99 10	• 7227 90 50
• 7213 91 41	• 7213 99 90	• 7227 90 95

### D2 Like goods

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

### D3 Comparison of goods subject to review and the like goods

34. 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:

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

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<sup>7</sup> [Trade Remedies Service | ER0082 Notice of Initiation](#)



35. 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.
  - 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.
36. 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 them. 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

37. 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.
38. We considered the likelihood of dumping from the PRC on a countrywide basis rather than exporter-by-exporter, as there were no cooperating PRC exporters registered to this case.
39. The dumping likelihood assessment considered: the continued imports of wire rod; the ability and incentive to dump into the UK; market distortions, such as a particular market situation (PMS); and any other relevant factors.
40. 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 The dumping assessment

#### E2.1 Whether imports of the goods subject to review have continued

41. The TRA assessed whether dumping of the goods subject to review is likely to continue if the measure were to expire. No submissions were received from UK importers of wire rod, or exporters of wire rod in the PRC. The analysis therefore draws on the best facts available to the TRA.
42. Data from GTT (Global Trade Tracker) analytics indicate that during the POI the total UK imports of wire rod from all countries amounted to approximately 0.224 million metric tonnes (mmt), while imports from the PRC amounted to 41 tonnes, representing around 0.02% of total UK imports. Over the longer historical period from September 2020 to September 2025, total UK imports of wire rod amounted to approximately 1.33 mmt, of which imports from the PRC accounted for 97 tonnes, or approximately 0.01%.

**Table 1: Imports into the UK from the PRC by volume**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
PRC import volume (index)	100	6	46	4
PRC volume relative to UK total imports (%)	0.01%	0.00%	0.01%	0.00%

Source: HMRC raw customs declarations data.



**Table 2: Imports into the UK from the PRC by value**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
PRC import value (index)	100	65	75	82
PRC value relative to UK total imports (%)	0.04%	0.02%	0.03%	0.03%

Source: HMRC raw customs declarations data

43. The TRA analysed HMRC raw customs data for all commodity codes in scope of the review. As shown in Table 1, import volumes from the PRC remained at extremely limited levels throughout the IP, consistently accounting for less than 1%. This finding is consistent with the trends observed in the GTT dataset.
44. The TRA concludes that since the imposition of the anti-dumping measure, imports of the goods subject to review have been negligible over the IP. Given this, the TRA cannot therefore determine if dumping has continued.

## E2.2 Price analysis

### E2.2.1 Normal Value

45. The TRA did not receive any engagement from producers of wire rod from the PRC. As a precise normal value cannot be determined without the data from PRC producers, the TRA has therefore determined an indicative normal value (INV) for the purposes of supporting the dumping likelihood assessment. When determining an indicative normal value, the TRA used best facts available.
46. To produce Table 3 below, and for a consistent monthly ex-works price for PRC wire rod, daily price listings were collected from a commercial pricing platform covering all available wire rod products offered by PRC suppliers. For each month, three reference dates were selected at evenly spaced intervals, the 5<sup>th</sup>, 15<sup>th</sup>, and 25<sup>th</sup>, and where data for these exact dates were unavailable, the closest available trading day was used. The prices observed on these three dates for all products of wire rod were then averaged to generate a single monthly ex-works price per tonne. This approach provides a representative monthly indicator while smoothing short-term volatility in prices.



**Table 3: Average price of wire rod products at ex-works during the POI**

Month	Average price (£/t)
Oct-24	423
Nov-24	405
Dec-24	402
Jan-25	403
Feb-25	400
Mar-25	383
Apr-25	367
May-25	366
Jun-25	352
Jul-25	364
Aug-25	372
Sep-25	363

Source: China Steel Market daily wire rod prices.<sup>8</sup>

47. Table 3 shows that the average ex-works prices for wire rod in the PRC domestic market. As an average over the POI, the price at ex-works for wire rod produced in the PRC is £383/t.

### E2.2.2 Export price

48. Imports of wire rod from the PRC into the UK over the IP were negligible and therefore could not be used to determine an export price. The TRA has therefore used PRC export prices to third country markets as a proxy to estimate the export price.

**Table 4 : Average export price and to indicative normal value of wire rod during the POI**

	Year 4 (POI) 2024-2025
PRC GTT average export price (£/t)	362
PRC indicative normal value (£/t)	383

Source: GTT data on PRC exports to world and China Steel Market daily wire rod prices.

49. The data in Table 4 shows that the average export price of wire rod for PRC globally was £362/t, which is lower than the PRC's average domestic ex-works price at £383/t. This indicates that the goods subject to review are likely being dumped in at least some third country markets. The ex-works price, which excludes freight and related costs, represents a conservative estimate of the normal value.

50. Despite this, and notwithstanding the likely impact of a PMS as set out in section [E2.5](#), the export price still remains below the INV. If the distortive effects of PMS are considered, the INV is likely to be even higher and therefore the extent of this price difference would be expected to increase, further supporting the conclusion that current PRC exports of the goods subject to review are likely being dumped in some markets.

### E2.3 Ability to dump the goods subject to review

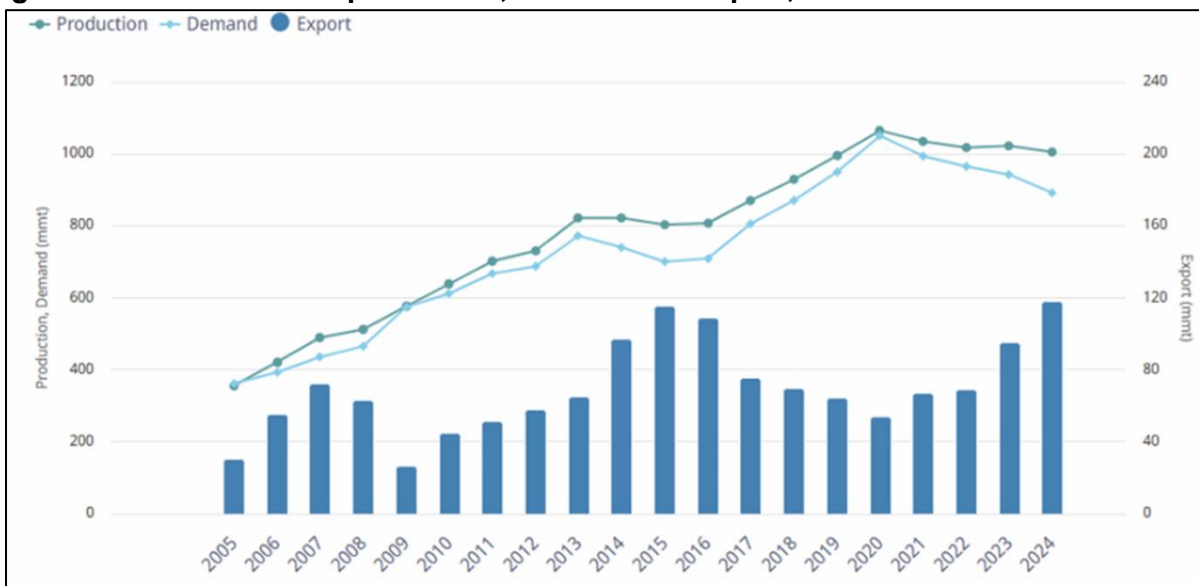
<sup>8</sup> [China Steel Market](#) - accessed 6/2/2026



**E.2.3.1 Production**

- 51. The OECD Steel Outlook 2025<sup>9</sup> reports that global capacity of steel extended to 2,472 mmt in 2024, with PRC producing 46% of the world’s total. PRC’s steel exports reached a level of 118 mmt in 2024, reflecting PRC’s continued role as a major producer and exporter in the global and long products market. This evidence relates to steel production and exports more broadly rather than to wire rod specifically but indicates the existence of substantial export-oriented production within the PRC steel sector.
- 52. According to GTT data, during the POI the PRC exported 6.31 mmt of wire rod worldwide. The volume exported by the PRC was sufficient to supply the entire UK over ten times. This means that the UK could be fully supplied using only a small proportion of PRC output of wire rod.

**Figure 1: The PRC’s steel production, demand and export, 2005-2024**



Source: World Steel Association 2024, World Steel in Figures<sup>10</sup>

- 53. Figure 1 shows the PRC’s steel production, domestic demand and exports from 2005 to 2024. Production has consistently exceeded domestic demand, creating a persistent surplus that has been channelled into export markets. Export volumes rise in periods where the gap between production and demand widens, indicating that excess capacity in the PRC is structural, significant and contributes to sustained export pressure.
- 54. While precise wire rod specific capacity and domestic consumption figures are not publicly available, the relative scale of PRC wire rod exports compared with the top seven major exporting countries show a dominant market share. GTT data on export of wire rod products (HS codes: 721310, 721320, 721391, 721399, 722710, 722720, 722790) shows

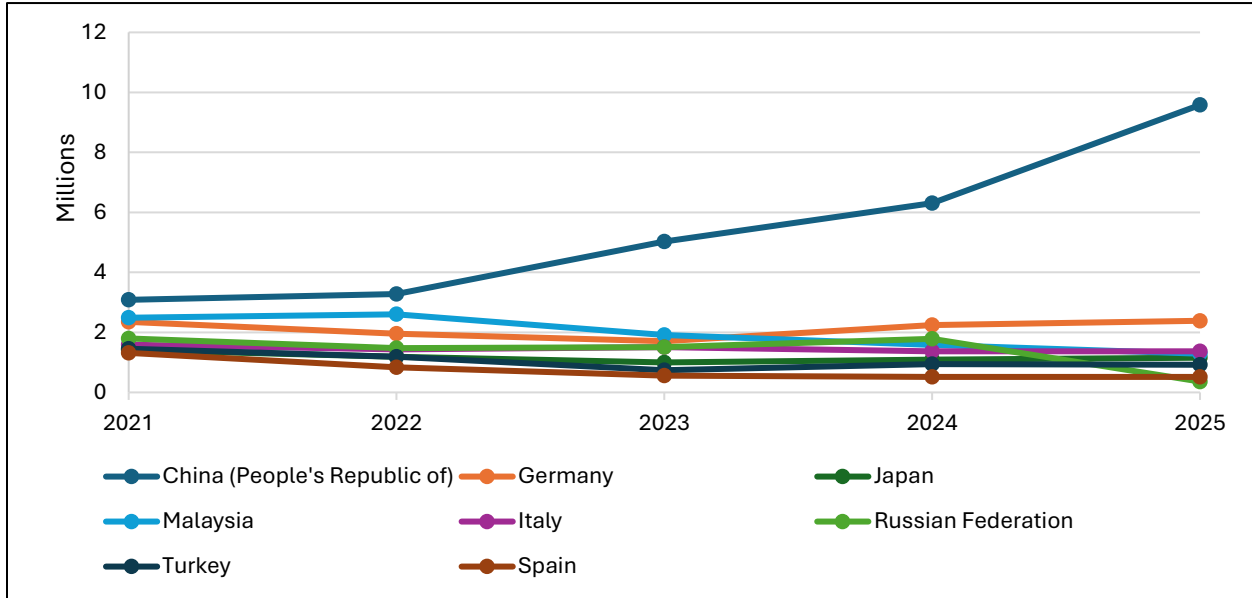
<sup>9</sup> [OECD Steel Outlook 2025](#) - accessed on 18/2/2026

<sup>10</sup> [World Steel in Figures](#) - accessed on 18/2/2026



that PRC remains a major global exporter over the period 2021 to 2025, including during the POI as shown in the figure below.

**Figure 2: GTT export volume in metric tonnes of the top eight global exporters of wire rod from 2021-2025**



Source: GTT data of wire rod all countries exports to world for HS codes: 721310, 721320, 721391, 721399, 722710, 722720, 722790.

55. Over the IP shown in Figure 2, PRC's export volumes display an overall upward trajectory, indicating a sustained ability to supply external markets. The other notable exporters of wire rod show stable export volumes over the IP, with some exhibiting a downward trend rather than growth. This highlights that the PRC's export volumes are increasing during a period in which other major exporters' volumes are broadly stable. The PRC's export volumes have shown significant growth, including during periods of increased trade defence activity against steel products originating from the PRC globally.<sup>11</sup> This indicates that the PRC produces significantly more wire rod than it consumes domestically and that PRC producers of wire rods are structurally dependent on export markets to clear surplus output. This surplus output is likely to place continued downward pressure on export prices, thereby increasing the likelihood that exports would be made at dumped prices.

<sup>11</sup>[GMK Center, Global Restrictions on Steel Products from China](#) - accessed 21/04/2026



### E2.3.2 Production capacity

56. The TRA assessed the production capacity of PRC producers for wire rod. Due to a lack of participation from overseas producers and exporters, the TRA relied on the best facts available.
57. Evidence from the Global Forum on Steel Excess Capacity 2018 (GFSEC)<sup>12</sup> indicates that substantial crude-steel capacity remains in the PRC and globally, despite recent reductions. The scale of this capacity where the PRC maintains 46% of global production of steel in 2024,<sup>13</sup> combined with the flexibility of modernised facilities, supports a finding that PRC exporters have the capability to increase output or reallocate production toward wire rod where commercial incentives arise.
58. According to the GFSEC, total global crude-steel capacity continues to exceed demand by a significant margin, with a capacity to demand gap of approximately 595 mmt in 2017<sup>14</sup>. The PRC remains the single largest steelmaking nation. In 2017, PRC crude-steel capacity stood at around 1,018mmt, representing just over half (51.5%) of all capacity reported by GFSEC members. While the PRC has undertaken capacity-reduction measures, 2017 capacity levels were still substantially higher than in 2000 and 2010, reflecting the long-term expansion of its steelmaking.
59. GFSEC reporting is at the crude-steel level and does not distinguish individual product groups such as wire rod. However, the existence of a large national steelmaking base, combined with overcapacity, increases the likelihood that PRC producers seek export markets to support utilisation.
60. This evidence indicates that the PRC maintains significant latent production capacity that could be used to increase wire rod output for export if commercial incentives were to arise. Despite reported reductions, PRC steelmaking capacity remains at historically elevated levels, well above long-term trends in global demand. Combined with the flexibility of the residual steelmaking fleet and the continued existence of global surplus capacity, this supports the assessment that capacity exists in the PRC to supply wire rod in meaningful volumes and can be mobilised quickly to export to the UK market should the current anti-dumping measure expire.

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<sup>12</sup> [Global Forum on Steel Excess Capacity 2018](#) - accessed 18/02/2026

<sup>13</sup> [OECD Steel Outlook 2025](#) - accessed on 18/2/2026

<sup>14</sup> [Global Forum on Steel Excess Capacity 2018](#) accessed 18/02/2026



### E2.3.3 Inventory

61. The TRA investigated inventories of the goods subject to review, but due to the lack of participation from overseas producers and exporters, we do not have direct evidence from the PRC industry. Therefore, the TRA assessed inventory using the best facts available.
62. The TRA assess that publicly available information on inventory levels held by PRC exporters is limited, and the extent to which these inventories reflect underlying production capacity cannot be reliably determined. However, data sets analysed indicate that inventory holdings form part of a flexible and responsive supply-chain model, enabling PRC producers to adjust output and deliveries in line with market conditions.

### E2.3.4 Ability to shift production to the goods subject to review

63. The TRA has not received any information from interested parties regarding the ability to shift production to the goods subject to review. Therefore, we have used information from secondary sources and best facts available to make our assessment.

**Table 5: GTT data of PRC exports of wire rod to world Oct 2021- Sept 2025**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
PRC wire rod export volume to world (t)	3,086,163	3,274,291	5,028,314	6,310,064
PRC wire rod export volume to world (index)	100	106	163	204
PRC wire rod export value to world (Billions of £)	1.59	2.11	2.46	2.65
PRC wire rod export value to world index (index)	100	132	154	166

Source: GTT PRC export data of wire rod to world.

64. Table 5 shows that PRC exports of wire rod increased sharply over the IP, indicating a sustained upward trajectory in both volume and value. Export volumes rose from 3.086 million tonnes in Year 1 to 6.310 million tonnes in the POI, representing an increase of over 3.2 million tonnes, a doubling of export volumes. Export values followed a similar pattern, increasing from £1.59 billion to £2.65 billion. These trends demonstrate a clear, year-on-year escalation in the PRC's wire rod export activity, with the steepest increases occurring in the later years of the period, suggesting an accelerating outward flow of the goods concerned.
65. Rapid export growth provides evidence that the PRC steel sector is able to redirect output toward wire rod in response to market conditions. The increase in export volumes over the period, which more than doubled, indicates that producers have both the upstream crude steel capacity and the operational flexibility to expand wire rod output at scale. The simultaneous rise in export values reinforces that this was not a temporary or price-driven anomaly, but rather a sustained shift in production allocation. Export value increased to a lesser degree than volumes and suggests that this expansion has occurred alongside



lower prices per tonne. This is consistent with PRC exporters being able to expand market presence while maintaining downward pressure on prices, increasing the likelihood of dumping. Taken together, the data support a finding that PRC producers possess and demonstrate an ability to reallocate steelmaking and rolling capacity toward the goods subject to review when commercial incentives arise.

## E2.4 Assessment of incentives to dump the goods subject to review to the UK

### E2.4.1 Patterns of circumvention of trade remedies measures

66. The TRA did not find or receive any evidence indicating that exporters have previously circumvented or routinely absorbed the effects of the trade remedies measure. No information was submitted by interested parties, and the TRA was unable to identify any credible sources suggesting that such behaviour has occurred.

### E2.4.2 Current and projected market conditions in the UK market

67. Due to a lack of participation from overseas producers and exporters, the TRA does not have data on market prices in the PRC and have therefore used best facts available.

**Table 6: Top five exporters to the UK from third countries, 2021-2025**

	Units	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Portugal	Volume (index)	100	105	122	73
	Share of Imports	100	124	142	104
	Unit price (index)	100	90	75	74
Germany	Volume (index)	100	76	83	61
	Share of Imports	100	90	97	86
	Unit price (index)	100	84	72	74
Czechia	Volume (index)	100	107	93	87
	Share of Imports	100	126	109	123
	Unit price (index)	100	89	77	75
France	Volume (index)	100	69	71	110
	Share of Imports	100	81	83	156
	Unit price (index)	100	115	94	75
Spain	Volume (index)	100	28	53	88
	Share of Imports	100	33	61	124
	Unit price (index)	100	118	70	64
UK Total	Volume (index)	100	85	86	71
	Unit price (index)	100	89	74	74

Source: HMRC raw customs declarations data.

68. Table 6 compares the top five exporters to the UK using indexed data on import volumes, shares of total UK imports and unit prices. Across the injury period, the indexed unit prices for wire rod declined for all major supplying countries. The UK average unit price index fell



steadily from 100 in Year 1 to 74 in Year 4, indicating sustained downward price pressure in the UK market.

69. All EU suppliers exhibited similar trends. Portugal, Germany, Czechia, France and Spain each recorded declines in their unit price indices over the IP, with prices in Year 4 materially below Year 1 levels. The price reductions occurred alongside shifts in indexed import volumes and shares, with some suppliers experiencing fluctuations in their share of total UK imports over time.
70. The indexed data indicate that the UK market experienced persistent downward pressure on import prices among established suppliers throughout the injury period, reflecting a competitive pricing environment even as overall import volumes declined. The INV for wire rod at £383/t is lower than the import price of wire rod into the UK for the top five exporters. However, it should be noted that this is an indicative value based on best facts available at ex-works, which is a conservative estimate that does not account for freight and other additional costs and with non-commercial factors distorting the price. Accordingly, this comparison indicates that it is likely that the goods subject to review would be dumped into the UK.

**E2.4.3 Attractiveness of the UK market to exporters**

71. The TRA estimated the consumption of wire rod within the UK by summing the imports and domestic production.

**Table 7: UK consumption of wire rod**

	<b>Year 1 2021-2022</b>	<b>Year 2 2022-2023</b>	<b>Year 3 2023-2024</b>	<b>Year 4 2024-2025</b>
UK consumption by volume (index)	100	84	81	76
UK consumption by value (index)	100	71	59	52

Source: UK producer questionnaire and HMRC raw customs declarations data.

72. UK consumption of wire rod declined over the IP. In indexed terms, consumption by volume fell from 100 in Year 1 to 76 in Year 4, while consumption by value declined more sharply, from 100 to 52 over the same period. This indicates a contraction in the UK market both in terms of physical demand and overall market value. Despite the reduction in market size, the UK market continues to be supplied to a significant extent by imports, indicating an ongoing reliance on external suppliers to meet domestic demand.
73. In contrast, PRC export activity expanded significantly over the same period, as seen in Table 5. PRC global export volumes in Year 4 were more than ten times the total size of UK consumption, underscoring the difference in scale between PRC output and the UK market demand.
74. Given that PRC exporters operate with volumes exceeding the size of the entire UK market, even a modest redirection of PRC exports would equate to a substantial share of UK consumption. As described in section [E2.3.4](#), the PRC has demonstrated a clear ability to adjust its steelmaking operations in response to global changes in demand for



wire rod and to shift production towards the goods concerned when market conditions justify it.

75. UK import prices (see Table 6) are higher than the PRC average export prices (see Table 9) observed in third country markets. As a result, the UK market would be considered an attractive destination for PRC exporters in the absence of a measure on the goods subject to review, as PRC exporters could supply the UK at competitive price levels. The existence of protective measures in multiple export markets further increases the attractiveness of the UK market. It can therefore be reasonably expected that PRC exports of wire rod would resume in considerable volumes should the measure expire. When combining the evidence of rising PRC export volumes globally seen in Figure 1, average export price being lower than the INV in third country markets and increasing spare capacity within the PRC, this supports the assessment that the UK is an attractive market for exports and considerable volumes would resume should market access opportunities arise.

#### E2.4.4 Current and projected market conditions in the overseas exporter’s domestic market

76. Due to a lack of participation from overseas producers and exporters, the TRA has used best facts available to supplement data on conditions in the PRC domestic market where possible.
77. The OECD report<sup>15</sup> describes global steel market conditions characterised by structural excess capacity and competitive pressures, which generally contribute to export-oriented behaviour. The report does not contain product-specific evidence on domestic demand, prices, or profitability for wire rod in the PRC. However, the broader sectoral context described by the OECD is consistent with continued export pressure and correlates with the PRC’s increased exports of wire rod seen in Table 5 of this section.

**Table 8: Countries with the most volume of imports of the goods subject to review, including the UK**

Country by volume (t)	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Thailand	270,787	372,564	545,299	790,426
Republic of Korea	683,119	728,670	965,077	836,964
Vietnam	322,779	256,234	366,122	526,654
Indonesia	264,041	243,535	307,172	345,483
Philippines	200,892	149,936	426,704	330,368
UK	-	-	56	4

Source: GTT PRC export data of wire rod to world.

**Table 9: Countries with the most volume of imports of the goods subject to review by unit price (£/t), including the UK**

Country by unit price (£/t)	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Thailand	527	625	488	427

<sup>15</sup> [OECD Steel Outlook 2025](#) - accessed on 18/2/2026



Republic of Korea	536	647	499	426
Vietnam	564	697	502	437
Indonesia	538	655	505	444
Philippines	468	655	457	390
UK	-	-	430	1,803

Source: GTT PRC export data of wire rod to world.

78. The data in Table 5 and 8 indicates that the PRC can react to market conditions and increase production of the goods concerned. This would likely result in increased competition between producers which could cause them to look elsewhere to sell their product. Should the measure expire, the UK would become a more attractive destination.
79. According to the OECD, the steel markets indicate that global steelmaking capacity continues to expand despite weak demand growth as seen in Figure 1, with excess capacity expected to increase further through 2025 as export volumes trend positively. The PRC accounts for most of this capacity and remains the central driver of global overcapacity in the steel industry. These structural conditions imply that significant spare capacity exists in the PRC's long-product sector, including wire rod, and that utilisation rates can increase rapidly when export opportunities arise. Over the IP, PRC volumes have increased but value to a lesser degree. This would lead to pricing pressures on PRC exporters and likely result in lower export prices, this can be seen in Table 9 in third country markets.
80. During the POI, despite negligible import volumes to the UK and significant trade defence activity against PRC steel products, the PRC continued to lead in the export of wire rod globally. While export volume alone does not demonstrate excess capacity, the observed trend indicates that PRC producers have capacity to increase exports to additional markets should access conditions change.

#### **E2.4.5 Current and projected market conditions in major third countries' domestic markets**

81. Due to the lack of participation from overseas producers and exporters, the TRA does not have primary data on global exports of like goods from the PRC and have used best facts available.
82. Price trends analysed from GTT data indicate that PRC export prices in third-country markets are generally positioned at the lower end of the range when compared with several other major exporting countries between 2021 to 2025 as seen below in Table 10. This suggests that PRC exporters can compete at relatively low-price levels in export markets.

**Table 10: GTT data on average unit price (£/t) for top wire rod exporters to world**

	2021	2022	2023	2024	2025
PRC	516	643	489	420	362
Germany	658	913	690	616	579
Japan	707	965	953	862	737
Malaysia	428	516	443	416	430
Italy	622	788	575	538	522
Russian Federation	488	553	435	382	397
Turkey	531	635	508	478	434



Spain	620	842	715	648	627
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Source: GTT PRC export data of wire rod to world.

83. Table 10 shows that the average worldwide export prices for wire rod have fallen steadily across all major exporting countries between 2021 and 2025. Within this general downward trend, the PRC consistently remains among the lowest priced exports every year, with prices falling from £516/t in 2021 to £362/t in 2025, placing the PRC below or equal to nearly all major competitors throughout the period and below the INV of £383/t during the POI. There is an overall trend of reduced export prices year-on-year since 2022, most likely due to global overproduction and increased competitive pressure. As PRC exports trend positively as seen in Figure 2, this is likely to continue in the coming years as surplus volume increases. This increased price pressure is likely to result in further reductions in the export prices for PRC exporters and a greater price difference between export price and INV, therefore increasing the likelihood of dumping. It demonstrates PRC exports could compete competitively on price in the UK market at levels below prevailing prices of other major exporters of wire rod, increasing the likelihood that exports from the PRC would resume in considerable volume if the measures were to expire.
84. The TRA analysed GTT data for PRC exports to the world with the top five export countries in Table 8 and Table 9, whilst also including the UK. The data show a substantial increase in PRC wire rod exports to several third-country markets over the period, with strong growth in Southeast and South Asia. Exports to Thailand rose sharply from 270,787t in Year 1 to 790,426t in Year 4, representing a significant increase over the period. Vietnam also saw sustained expansion, increasing from 322,779t to 526,654t, while exports to Indonesia grew from 264,041t to 345,483t. The Philippines shows a different pattern, with a decline in Year 2 followed by a strong increase in Year 3 and a slight reduction in Year 4. The Republic of Korea shows a broadly increasing trend, peaking in Year 3 before declining in Year 4.
85. The UK received only negligible volumes in Years 3 and 4. The pattern indicates that PRC exporters are actively expanding sales into a wide range of third-country markets.
86. Export prices of the goods subject to review to these third-country markets consistently declined across the period. Unit prices to Thailand fell from £527/t in Year 1 to £427/t in Year 4, and prices to the Philippines decreased from £468/t to £390/t. Similar reductions occurred in Vietnam from £564/t to £437/t and Indonesia from £538/t to £444/t. The trajectory is downward, with most markets converging toward a £390–£444/t range in Year 4. These sustained price reductions occur alongside large volume increases, especially in Thailand and Vietnam, indicating that PRC exporters were able to expand market presence while progressively lowering prices. These export prices are above the conservative ex-works INV of £383/t in Year 4, however given that the price does not include adjustments for the likely PMS distortions, the comparison is consistent with the assessment that export prices are likely to be set at dumped levels. Prices to the UK, although based on negligible volumes, do not follow this pattern and rise sharply in Year 4, which would be expected with the measure in place.



87. The combined trends show that PRC exporters have been increasingly active in third-country markets, expanding volumes rapidly while offering declining prices. This pattern is consistent with a strategy of gaining or defending market share through price competition, supported by the PRC's large and flexible steelmaking capacity. It demonstrates that PRC exporters operate successfully in price-sensitive markets, consistently supply at relatively low-price levels, and have a demonstrated ability to divert production to external destinations at scale. If the PRC were to re-enter the UK market, this data suggests that it could do so at similarly competitive price levels, increasing the likelihood that exports could be priced below normal value.
88. Despite leading global exports, the PRC faces significant trade barriers in multiple markets. It is reported that 62 countries have implemented 207 trade restrictions against steel products from the PRC.<sup>16</sup> Therefore, it is consistent to conclude that there are incentives for exporters to redirect exports toward markets where measures are not in place or where access conditions may be more favourable such as the existing anti-dumping measures being removed.

## E2.5 Particular Market Situation

89. The TRA assessed whether it is likely that a PMS exists for the goods subject to review and considered how any such situation may affect the normal value of those goods. On the basis of the evidence set out below, the TRA considers that such conditions are likely to present and that domestic prices may be influenced by non-commercial factors (within the meaning of Regulation 7(4)(c) of the Regulations). The domestic ex-works prices used to derive the INV may be distorted and not fully reflect market conditions and are artificially low. The TRA has therefore considered the INV of £383/t as a conservative estimate and if the effects of the PMS are taken into account, the normal value would be expected to be higher. The assessment focused on whether a PMS is likely to influence prices and competitive conditions in the exporting country in a way that could affect the likelihood that dumping would recur if the measure were varied or allowed to expire.

### E2.5.1 Applicants claims

90. The applicant claims that a PMS is likely to exist in the PRC on the basis that prices and costs in the PRC wire rod sector are shaped by substantial government intervention rather than market forces. They note that PRC wire rod prices sit significantly below international benchmarks even after neutral adjustments for freight and logistics, creating a persistent delivered-price discount of approximately fifteen to twenty percent compared with UK and European levels.<sup>17</sup> The submission attributes these artificially low prices to non-commercial factors embedded in the PRC's economic and legal framework, including the State's constitutionally enshrined dominance over the economy, the leadership role of the Chinese Communist Party in all enterprises, and an extensive system of industrial

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<sup>16</sup> [GMK Center, Global Restrictions on Steel Products from China](#) - accessed 21/04/2026

<sup>17</sup> [Steel Submission on PMS G1](#) – Page 1



planning that directs production and investment across the steel supply chain.<sup>18</sup> The applicant further cites evidence that these interventions permeate all major inputs used in wire rod production, including iron ore, coal, energy, labour, land and finance, each of which is subject to regulatory control, subsidies, or administrative influence that suppresses costs below levels expected under normal market conditions.<sup>19</sup>

91. The submission also argues that the structure and governance of the PRC steel industry reinforce these distortions. State-owned enterprises (SOEs) remain dominant in steelmaking, with both SOEs and private producers subject to policy supervision and CCP oversight, which gives the State the ability to influence pricing and operational decisions across the sector,<sup>20</sup> The applicant highlights that upstream distortions inevitably transmit into wire rod because the product is dependent on billets and other steelmaking inputs that are themselves influenced by non-commercial factors.<sup>21</sup> They also refer to findings from recent EU and US trade remedy investigations, which identified significant distortions and widespread subsidisation affecting PRC wire rod producers, and which concluded that a PMS existed in the PRC steel market.<sup>22</sup> On this basis, the applicant contends that the conditions creating a PMS in the PRC are systemic and continue to affect the prices and costs of wire rod in a way that is relevant to assessing the likelihood of dumping.

#### **E2.5.2 EU report on significant distortions in the economy of the PRC for the purposes of trade investigations**

92. The EU commission document on significant distortions in the economy of the PRC for the purposes of trade defence investigations<sup>23</sup> indicates that the PRC's economic system is characterised by extensive state involvement that directly affects the formation of prices and costs. The report explains that the PRC's economic model is formally defined as a socialist market economy, a system in which the state and the Chinese Communist Party (CCP) maintain decisive authority over economic direction and resource allocation. These constitutional and institutional arrangements ensure that market mechanisms operate only within boundaries set by the state, creating conditions that can distort the normal functioning of supply, demand and pricing. This is relevant to the assessment of costs for steel products, including wire rod.
93. The CCP exercises direct influence over both state owned and private enterprises, including firms active in steel and downstream rolling operations that produce long products such as wire rod. Party organisations within enterprises possess authority to influence managerial decisions, oversee business conduct and ensure alignment with state policy objectives. This environment means that producers may make decisions on

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<sup>18</sup> [7Steel Submission on PMS G1](#) – Page 2-3

<sup>19</sup> [7Steel Submission on PMS G1](#) – Page 7-9

<sup>20</sup> [7Steel Submission on PMS G1](#) – Page 3-4

<sup>21</sup> [7Steel Submission on PMS G1](#) – Page 9

<sup>22</sup> [7Steel Submission on PMS G1](#) – Page 9-10

<sup>23</sup> [EU Commission Market Distortions](#) – accessed on 6/2/2026



production volumes, pricing or investment based on political direction rather than commercial interest.

94. The report also identifies significant distortions in the factors of production, including land, energy, capital and raw materials. Steel producers, including those supplying billet for wire rod production, benefit from non-market access to land and energy, preferential financing conditions and state influenced pricing of key inputs. The financial system is highlighted as a major channel of distortion, with banks and investment funds instructed to support state priorities rather than act on independent credit assessments. These practices lower the cost of production artificially for steel and wire rod producers relative to conditions that would prevail in a market economy.
95. The report shows that the steel industry is subject to strong state direction and intervention. The steel chapter describes measures that affect capacity levels, product mix, industrial structure and regional concentration, all of which influence cost formation within the sector. Wire rod production relies on upstream crude steel and billet, and the conditions of distortion present in these upstream markets necessarily carry through to the costs of producing downstream long products.
96. Given the reliance of wire rod production on upstream steelmaking processes that are directly affected by these interventions, the findings indicate that a PMS is likely to exist for steel products produced in the PRC. The nature of the identified distortions would be expected to influence both domestic pricing and export pricing behaviour of wire rod.

### E2.5.3 Labour

97. The TRA has determined in previous investigations<sup>24,25,26</sup> that labour costs in the PRC reflect non-commercial factors (within the meaning of Regulation 7(4)(c) of the Regulations). The EU commissions expiry review on an anti-dumping measure on wire rod determined there were significant distortions in the PRC market.<sup>27</sup>
98. The Trade Union Law of the PRC governs establishment and operation of labour unions, which significantly affects the ability of organised labour to demand higher wages.<sup>28</sup> Article 3 of the Trade Union Law states that all workers have the right to organise or join trade unions according to law, and that no organisations or individuals should obstruct or restrict them. However, article 2 states that “*Trade unions are mass organizations of the working class under the leadership of the CCP*”, article 4 states how all trade unions must align ideologically and politically with the CCP, and article 32 states that trade unions should “*strengthen ideological and political guidance for employees*”. Article 32 of the CCP constitution states that it “*exercises leadership over the trade unions*” within non-public

<sup>24</sup> [TRA AD0012 case on Aluminium Extrusions](#) - accessed on 8/3/2026

<sup>25</sup> [TRA AD0021 case on Optical Fibre Cables](#) - accessed on 8/3/2026

<sup>26</sup> [TRA AD0067 case on Excavators](#) - accessed on 8/3/2026

<sup>27</sup> [EU Commission Wire rod expiry review 2021](#) - accessed on 8/3/2026

<sup>28</sup> [Trade Union Law of the People's Republic of China](#) Article 3 - accessed 8/3/2026



sector entities in order to implement government policy.<sup>29</sup> These articles show that all trade unions must be politically and ideologically aligned with the CCP, reducing the ability of workers to advocate for higher wages as it requires the support of the CCP.

99. PRC workers do not have the right to establish independent trade unions to organise wage negotiations because all unions are required to be organised under the oversight of the All-China Federation of Trade Unions (ACFTU).<sup>30</sup> The ACFTU consists of many local and grassroots trade unions, but all unions are subject to oversight by the ACFTU.
100. The ACFTU's history of supporting labour and providing suitable and competitive advocacy on behalf of workers is controversial. The China Labour Bulletin, a Hong Kong based advocacy group, issued a report calling into question the independence of the ACFTU from CCP political influence,<sup>31</sup> highlighting that "*because the ACFTU's focus has been on its local unions, the numerous enterprise unions that it has set up have, more often than not, become mere empty shells, controlled or dominated by managements and unable to represent workers' interests.*"
101. There are strong ties between ACFTU, the CCP, and company management. The Global Labour University (GLU), part of the International Labour Office, found that of the 1,811 union presidents surveyed within ACFTU companies:<sup>32</sup>
- 90.3% were CCP members (National Bureau of Statistics data show 7.12% of the PRC population were CCP members in December 2024)<sup>33</sup>
  - 40.6% were middle-level managers
  - 17.9% were CCP committee directors or deputy-director of CCP committees
  - 13.3% were retired factory heads or managers
  - Only 4.2% were ordinary employees before becoming union presidents
  - 23.3% were directly appointed by higher-level unions or CCP branches
  - 51.7% of union president elections had only one candidate selected by the CCP or higher-level unions
  - Only 2.6% were elected through open, competitive screening tests
102. These findings by the GLU show that despite the requirement in Articles 6 and 10 of the Trade Union Law of the PRC which mandate elections and democratic consultation,<sup>34</sup> most union presidents of the ACFTU were CCP members who were part of company

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<sup>29</sup> [Constitution of the Communist Party of China, Article 32](#) - accessed on 8/3/2026

<sup>30</sup> [Trade Union Law of the People's Republic of China](#), Chapter II Trade Union Organisation - accessed 8/3/2026

<sup>31</sup> [Research Report into Worker Rights Promotion in China \(No. 1\)](#) - accessed 8/3/2026

<sup>32</sup> [All-China Federation of Trade Unions: Structure, Functions and the Challenge of Collective Bargaining](#) - accessed 23/05/2025

<sup>33</sup> [Statistical Bulletin of the Communist Party of China \[CCP membership\]](#) and [Statistical Communiqué of the People's Republic of China on National Economic and Social Development in 2024 \[Population of the PRC\]](#) - accessed 8/3/2026

<sup>34</sup> [Trade Union Law of the People's Republic of China](#) Articles 6 and 10 - accessed 8/3/2026



management and most gained their positions through undemocratic election processes. This indicates that the leadership of ACFTU members is highly likely to align with the goals of the CCP and company management, to the detriment of worker demands for improved wages and working conditions.

103. In 1982, the official recognition of the right to strike was removed from the constitution of the PRC,<sup>35 36</sup> which removed a key element of workers' collective bargaining power on wages. Article 290 of the Criminal Law of the PRC also states that "*Where people are gathered to disturb public order to such a serious extent that work in general, production, business operation, teaching or scientific research cannot go on and heavy losses are caused, the ringleaders shall be sentenced to fixed-term imprisonment*" and that "*active participants shall be sentenced to fixed-term imprisonment [...], criminal detention, public surveillance or deprivation of political rights*".<sup>37</sup> Several news outlets and research groups have reported on the arrest of labour activists in the PRC for labour protests and advocacy.<sup>38 39 40</sup> This shows that strikes that in the PRC can result in criminal prosecution, causing a chilling effect on industrial action and limiting the ability of workers to make demands of their employers.
104. The Trade Union Law states in article 23 that "*if an [organisation] violates labour laws and regulations and infringes upon the labour rights and interests of employees [...], the trade union shall represent the employees in negotiations with the [organisation] and demand that the [organisation] take corrective measures*" and article 28 states that "*When a work stoppage or slowdown occurs [...] trade unions shall assist [organisations] in their efforts to restore production and work as quickly as possible*".<sup>41</sup> This shows that negotiations during labour disputes must use trade unions as employee representatives and that trade unions can be legally compelled to end industrial action, which further limits the ability of workers to demand higher wages and improved working conditions using industrial action.
105. The household registration system, sometimes known as the hukou system, is a legal registration system that records basic information about workers and registers PRC citizens either a rural or urban hukou. PRC citizens working outside the township of their household registration are often referred to as "migrant workers" and systematically have lower average wages than non-migrant workers employed in the same areas.<sup>42</sup> Migrant workers can apply for permanent residence registration for themselves and their family if they acquire enough points which can be earned by "*legal and stable employment and legal and stable residence (including rentals), years of participation in urban social*

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<sup>35</sup> [2024 ITUC GLOBAL RIGHTS INDEX](#) - accessed 8/3/2026

<sup>36</sup> [Human Rights Council Universal Periodic Review on People's Republic of China](#) - accessed 8/3/2026

<sup>37</sup> [Criminal Law of the People's Republic of China, Article 290](#), accessed 8/3/2026

<sup>38</sup> [Wu Guijun trial tests China's tolerance of workers' strikes](#), Financial Times - accessed 8/3/2026

<sup>39</sup> [Prosecution of Labor Advocates Has Chilling Effect on Labor NGOs, Strikes Continue](#), Congressional-Executive Commission on China - accessed 8/3/2026

<sup>40</sup> [China Arrests At Least Three Labor Activists in Shenzhen](#), Radio Free Asia - accessed 8/3/2026

<sup>41</sup> [Trade Union Law of the People's Republic of China](#), Articles 23 and 28 - accessed 8/3/2026

<sup>42</sup> [2024 Migrant Workers Monitoring Survey Report](#) - accessed 8/3/2026



*insurance, and years of continuous residence*”,<sup>43</sup> which encourages migrant workers to work in urban areas even if it is for very low wages so they can improve their chances of applying for an urban hukou.

106. Many employees work outside their township due to access to better public services such as improved education access, subsidised medical insurance and pensions, and widespread access to affordable housing with fixed standards and prices. The National Development and Reform Commission (NDRC) has stated that additional investment is needed to allow “*migrant populations to live and work in a city and enjoy the same public services as local residents with urban household registration*”, that liberalising the system (i.e., increasing the amount of citizens with an urban status) is desirable but it would increase costs for businesses and government spending in both the short and the long term, and that “*completely liberalizing it in the short term is unrealistic*” so “*restrictions on household registration should be relaxed in an orderly and measured manner*”.<sup>44</sup> This demonstrates that migrant workers have access to inferior public services relative to local urban workers and that the GoC intends to continue to liberalise the system rather than abolish the hukou system altogether.
107. Several liberalisations of the household registration system have increased the number of urban hukou holders, but there continues to be a large migrant population. 63.9% of the population of the PRC resided in urban areas in 2020, yet only 45.4% of the population of the PRC had an urban hukou registration in 2020.<sup>45</sup> Research published by the World Bank estimates that 300-400 million migrants live in urban areas,<sup>46</sup> and the National Bureau of Statistics reported in 2021 that approximately 500 million people had household registrations separate from their current residence.<sup>47</sup>
108. Reforms to the system in 2022 removed hukou restrictions in cities with a population of less than 3 million, relaxed restrictions in cities with less than 5 million population, and introduced minor reforms to restrictions in cities with over 5 million residents.<sup>48</sup> This means that the effect of migrant workers on wages is concentrated in large cities although the impact of the hukou system on wages is not strictly limited to large urban areas. The Centre for Strategic & International Studies<sup>49</sup> states that “*centrally directed hukou reforms have largely been watered down by local governments and offset by more migration,*

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<sup>43</sup> Opinions of the State Council on Further Promoting the Reform of the Household Registration System - accessed 8/3/2026

<sup>44</sup> [Zhao Junjie: Review of the Reform Process of China's Household Registration System, Reform Evaluation and Trend Judgment](#) - accessed 8/3/2026

<sup>45</sup> [Bulletin of the Seventh National Population Census \[1\] \(No. 7\) - Urban and Rural Population and Migrant Population - I. Urban and Rural Population](#), National Bureau of Statistics - accessed 8/3/2026

<sup>46</sup> [Internal Migration in China: Integrating Migration with Urbanization Policies and Hukou Reform \(English\)](#), World Bank Group - accessed on 8/3/2026

<sup>47</sup> [Bulletin of the Seventh National Population Census \[1\] \(No. 7\) - Urban and Rural Population and Migrant Population- II. Migrant Population](#), National Bureau of Statistics - accessed 8/3/2026

<sup>48</sup> [Notice of the National Development and Reform Commission on Issuing the Implementation Plan for New Urbanization in the 14th Five-Year](#) - accessed 8/3/2026

<sup>49</sup> [China's Hukou Reform in 2022: Do They Mean it this Time?](#), Centre for Strategic International Studies - accessed 8/3/2026



*suggesting that recently announced hukou reforms will have little effect on the millions of rural migrants in major cities.”*

109. China Briefing researched the impact of the household registration system on the PRC's economy, and reports that *“since hukou restricts the free mobility of Chinese workers, it strains overall economic growth. These effects are exacerbated because the PRC has a shrinking workforce that peaked in 2011 and has decreased every year since then, leading to double-digit growth in labour costs.”*
110. Employers do not have to pay social protection insurance for migrant workers if they have no contract of employment.<sup>50</sup> The National Bureau of Statistics reported that only 35.1% of migrant workers had a signed labour contract with their employer in 2016,<sup>51</sup> and the International Journal of Environmental Research and Public Health indicates this number has increased to 47.7% in 2022.<sup>52</sup> This confers an advantage to the employer of reduced labour costs.
111. The hukou system consistently results in lower wages paid to migrant workers within professions.<sup>53</sup> The GLU found that migrant workers earned 20-50% less than urban workers in the same area of employment, and the Hong Kong University of Science and Technology found that migrant workers had a negative pay differential of between 8-36% relative to urban workers.<sup>54</sup>
112. The effect of the hukou system is that the labour markets which determined wages are affected by the non-commercial factor of the legal registration status of individuals in the PRC. The system either limits employment exclusively to workers with the correct hukou registration or introduces a tiered wage system for migrant and non-migrant workers.

#### **E2.5.4 Energy**

113. TRA has determined in previous investigations<sup>55,56,57</sup> that energy costs in the PRC reflect non-commercial factors.
114. The electricity in the PRC is distributed and sold by two organisations dependant on region; either the State Grid Corporation of China (SGCC)<sup>58</sup> or the China Southern Power

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<sup>50</sup> [Improving social protection for internal migrant workers in China](#), International Labour Organisation - accessed 8/3/2026

<sup>51</sup> [Fewer of China's Migrant Workers Have Labor Contracts, Sixth Tone](#) - accessed 8/3/2026

<sup>52</sup> [Research on the Influence of Labor Contract on the Urban Integration of Migrant Workers: Empirical Analysis Based on China's Micro Data](#) - accessed 8/3/2026

<sup>53</sup> [All China Federation of Trade Unions: Structure, Functions and the Challenge of Collective Bargaining](#) - accessed 23/05/2025.

<sup>54</sup> [Wage Discrimination in Urban China: How Hukou Status Affects Migrant Pay | Thought Leadership Briefs | Publications | HKUST Institute for Emerging Market Studies](#) - accessed 27/05/2025

<sup>55</sup> [TRA AD0012 case on Aluminium Extrusions](#) - accessed on 8/3/2026

<sup>56</sup> [TRA AD0021 case on Optical Fibre Cables](#) - accessed on 8/3/2026

<sup>57</sup> [TRA AD0067 case on Excavators](#) - accessed on 8/3/2026

<sup>58</sup> [Company Introduction - State Grid Corporation of China](#) - accessed 8/3/2026



Grid (CSPG).<sup>59</sup> The CSPG operates in Guangdong, Guangxi, Yunnan, Guizhou, Hainan, Hong Kong, and Macao, and the SGCC operates in all other provinces and municipalities in the PRC.

115. Both companies are under the sole ownership of the State-owned Assets Supervision and Administration Commission of the State Council (SASAC)<sup>60</sup> and have corporate objectives that the organisations should implement state industrial policy and conform to the party line and principles of the CCP.<sup>61</sup> This demonstrates that the distribution and sale of electricity to companies in the PRC is significantly influenced by government policy and political objectives as opposed to purely commercial factors.
116. The WTO has found that price controls in the PRC take two forms; “government-set prices” or “government-guided prices”.<sup>62</sup> Government-set prices are fixed prices set by the competent authorities, while government-guided prices are prices set by business operators within a range of prices set by the competent pricing departments or other related government departments, within which the real price is allowed to fluctuate. In this section, both forms of price control will be considered indicative of non-commercial factors influencing the price of energy in the PRC.
117. The WTO considers electricity transmission and distribution to be a product subject to pricing controls set by the government.<sup>63</sup> Price controls are administered in the PRC by the Department of Pricing, which is part of the NDRC and its function is to “*monitor, forecast and give warning of price changes, and propose price control targets and policy recommendations*”.<sup>64</sup> The products and services that are subject to price controls are listed in a Central Government Pricing Catalogue.<sup>65</sup> The current Central Government Pricing Catalogue was issued by the NDRC on 13 March 2020 (NDRC Order No. 31, 2020) and came into effect on 1 May 2020. The list includes “*provincial and above provincial power grid transmission and distribution prices*”. This demonstrates that energy prices in the PRC are determined by price controls rather than by commercial factors.
118. The relevant legislation that regulates price controls is the Pricing Law of the PRC.<sup>66</sup> Articles of the Pricing Law that demonstrate the non-commercial determination of energy prices include:
- Article I “*This Law is enacted in order to standardize pricing, give play to the role of pricing in rationally allocating resources, stabilize the general level of market price,*

<sup>59</sup> [Company Basic Information – China Southern Power Grid](#) - accessed 8/3/2026

<sup>60</sup> [List of Central enterprises – SASAC](#) - accessed 8/3/2026

<sup>61</sup> [Party Building – State Grid Corporation of China](#) and [Discipline inspection and Supervision – China Southern Power Grid](#) - accessed 8/3/2026

<sup>62</sup> [WTO Trade Policy Review China: Report by the Secretariat - Sept 2021](#) - accessed 8/3/2026

<sup>63</sup> [WTO Trade Policy Review China: Report by the Secretariat - Nov 2024](#) - accessed 8/3/2026

<sup>64</sup> [National Development and Reform Commission \(NDRC\): About](#) - accessed 8/3/2026

<sup>65</sup> [NDRC: Order of the National Development and Reform Commission of the People's Republic of China](#) - accessed 8/3/2026

<sup>66</sup> [Pricing Law of the People's Republic of China](#) - accessed 8/3/2026



*protect the lawful rights and interests of consumers and managers and promote the sound development of a socialist market economy”.*

- *Article 6 “Commodity prices and service prices, with the exception of those whose prices shall be guided or fixed by the government under Article 18 of this Law, shall be regulated by the market, that is, fixed by the manager on his own in accordance with this Law”.*
- *Article 7 “The manager shall follow the principles of fairness, lawfulness and good faith in fixing prices”.*
- *Article 18 “When necessary, the government may guide or fix the prices for the following commodities and services:*
  - *a very small number of commodities that have a vital bearing on the development of the national economy and the well-being of the people;*
  - *a small number of commodities for which resources are scarce;*
  - *commodities placed under natural monopoly;*
  - *important public utilities; and*
  - *important public welfare services”*
- *Article 23 “For the setting of government guidance prices and government fixed prices for public utilities, public welfare services and commodities under natural monopoly that have a bearing on the immediate interests of the masses, a system for evidentiary hearing shall be established which shall be presided over by the government departments in charge of pricing and at which suggestions of consumers, managers and the other parties concerned shall be solicited and expounded as to their necessity and feasibility”.*

119. The NDRC has issued a notice in 2025 stating that “the mechanism price [for new energy] shall be implemented in accordance with the current price policy and shall not be higher than the local coal-fired power benchmark price”.<sup>67</sup> This shows that energy remains subject to the Pricing Law, and that energy is subject to maximum pricing policies, indicating that prices are still significantly influenced by non-commercial factors.

120. The same NDRC notice from 2025 states that energy pricing should “adhere to classified measures, [...] maintain policy connection to existing projects, and stabilise the expected benefits of incremental projects” and “adhere to overall coordination, and make concerted efforts in policies such as industry management, price mechanisms, [...] and better support the realisation of the goals of the new energy development plan”. This further demonstrates that energy pricing policy remains subject to national and industrial planning and remains a tool of the GoC to achieve its policy objectives.

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<sup>67</sup> [Notice on Deepening the Market-oriented Reform of New Energy Grid-connected Electricity Prices and Promoting the High-quality Development of New Energy](#) - accessed 8/3/2026



121. In 2022, the NDRC released a press notice stating that 20% of electricity prices were not set by the market.<sup>68</sup> This demonstrates that even according to NDRC public statements there are large sections of the PRC economy that receive energy at non-market prices, and this is likely to indirectly affect the prices of all other energy users in a non-commercial way.

#### **E2.5.5 Land**

122. The applicant claims that property rights are regularly not respected in relation to ownership of land and land-use rights in the PRC, which has resulted in distorted land costs for producers of the goods concerned in the PRC. The TRA has determined in previous investigations that land prices in the PRC reflect non-commercial factors.

123. Several laws within the PRC state how land use rights are owned and allocated in the PRC.

124. Article 10 of the Constitution of the PRC states that “The land in cities belongs to the State”, and that “except for land that is owned by the state as stipulated by law, land in rural areas and urban suburbs is collectively owned”.<sup>69</sup> Article 10 also states that “for the needs of public interest, the state may expropriate or requisition land and provide compensation in accordance with the law”, and that “the right to use land may be transferred in accordance with the provisions of the law”.

125. The Ministry of Natural Resources states in Article 5 of the Provisions on the Transfer of State-owned Construction Land Use Rights through Bidding, Auction and Listing that land allocation will be done “based on economic and social development plans, industrial policies, overall land use plans, annual land use plans, urban planning, and land market conditions. After approval by the people's government at the same level, the plans shall be promptly released to the public”.<sup>70</sup>

126. The Land Administration Law of the PRC states in article 2 that the State Council of the PRC owns all state land, that no individuals may own land and the right to use land is transferred according to law, that it may expropriate or requisition land in accordance with the law, and that it implements paid use of state-owned land except where the state allocates land use rights.<sup>71</sup> Article 4 then states that those given land use rights “must use the land strictly in accordance with the purpose determined by the overall land use plan”, article 15 states that “People's governments at all levels shall organize the preparation of overall land use plans based on the national economic and social development plans, [...]”, and article 23 states that “the annual land use plan shall be prepared based on the

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<sup>68</sup> [China's pricing mechanism highly market-based: National Development and Reform Commission \(NDRC\) People's Republic of China](#) - accessed 8/3/2026

<sup>69</sup> [Constitution of the People's Republic of China - Chapter I General Principles - Article 10 \(2018\)](#) - accessed 8/3/2026

<sup>70</sup> [Provisions on the Transfer of State-owned Construction Land Use Rights through Bidding, Auction and Listing](#) - accessed 8/3/2026

<sup>71</sup> [Land Management Law of the People's Republic of China - General Provisions \(2019\), third amendment \(2019\)](#) - accessed 17/3/2025.



national economic and social development plan, national industrial policy, overall land use plan and the actual situation of construction land and land use". These articles demonstrate that land use right allocation must be done in accordance with state industrial and social planning, and that all levels of government are required to coordinate the allocation of land-use rights.

127. The Civil Code of the PRC includes property rights regulations in the PRC, superseding the previous the Property Law of the PRC when it entered into force in 2021.<sup>72</sup> It states in article 347 that "Commercial land such as industrial, commercial, tourism, entertainment and commercial residential land, as well as land with more than two potential users, shall be sold through public bidding such as tendering and auction". However, this is expanded on in the Urban Real Estate Management Law of the PRC which states in article 13 that "for commercial, tourism, entertainment and luxury residential land, [...] if conditions do not permit and auction or bidding is not an option, bilateral agreement may be used. The transfer fee for land use rights transferred by way of bilateral agreement shall not be lower than the minimum price determined in accordance with national regulations".<sup>73</sup> This law therefore allows land to be transferred via closed bilateral agreements and introduces price fixing based on national regulations rather than the commercial value of the land.
128. The Civil Code also states in article 354 that where construction land is "transferred, exchanged, contributed, donated or mortgaged, the parties shall enter into a corresponding contract in written form". This shows that there are additional ways to subvert the process of acquiring land use rights via tendering and auctions in the PRC.
129. These laws demonstrate that the GoC strictly controls what land can be used for based on factors such as development plans and industrial policy, and that it has significant influence over access to land before and after it has been allocated to organisations. This control and influence over the market for land use rights results in the price of land being significantly determined by the industrial planning and political decision-making of the GoC rather than commercial factors such as the demand and supply of land within the PRC.
130. Land is preferentially priced based on certain state industrial policies. For instance, encouraged foreign-funded projects with intensive land use can be priced at 70% of the national minimum price for the transfer of industrial land.<sup>74</sup> The Ministry of Natural Resources also limits the price of long term leases based on what it determines the land value to be and strictly limits rent price increases to less than 10%.<sup>75</sup> This shows how state industrial planning influences the price of land in the PRC depending on state priorities.

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<sup>72</sup> [Civil Code of the People's Republic of China – part II Property Rights](#) - accessed 8/3/2026

<sup>73</sup> [Urban Real Estate Management Law of the People's Republic of China - Chapter II Land for Real Estate Development](#) - accessed 8/3/2026

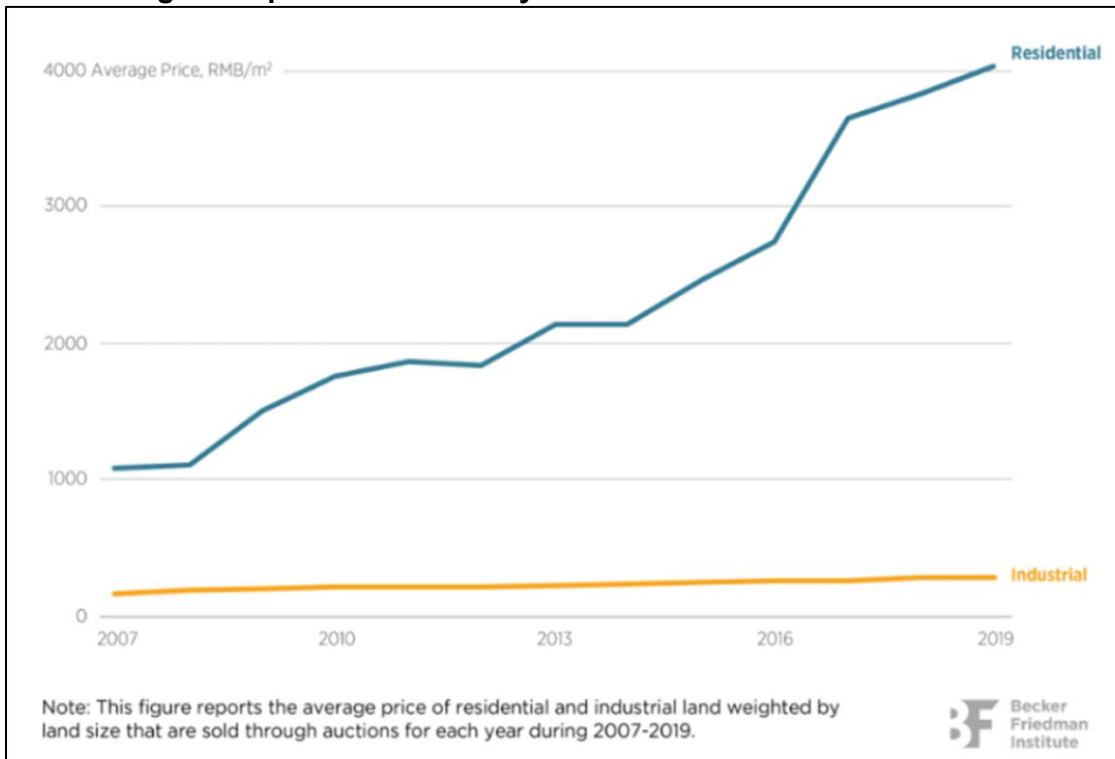
<sup>74</sup> [China Released Draft Encouraged Catalogue to Boost Foreign Investment, China Briefing \(2024\)](#) - accessed 8/3/2026

<sup>75</sup> [Notice of the Ministry of Natural Resources on Improving Industrial Land Supply Policies to Support the Development of the Real Economy \(2022\)](#) - accessed 8/3/2026



131. A strong indication that the price of land use rights for industrial use reflect non-commercial factors is that industrial land in the PRC is routinely priced at a significantly lower price than residential land. Research by the University of Chicago in 2022 found that the average land price of residential land in the PRC rose significantly whereas the price of industrial land rose only marginally between 2007-2019, resulting in the average price of residential land being over 10 times higher than industrial land in 2019.<sup>76</sup> The research proposes that residential land rates are primarily in place to raise local government revenue and reflect market realities to maximise revenue, whereas industrial land prices reflect subsidised industrial policies and is not representative of commercial reality.

**Figure 3: Average land prices over time by land use: industrial vs. residential**



Source: *Beckler Friedman Institute for Economics*<sup>77</sup>

## E2.6 Other factors

132. The TRA examined whether any additional factors would materially influence the likelihood of dumping of the goods concerned. Following this assessment, no further relevant factors were identified.

<sup>76</sup> [Is There an Industrial Land Discount in China? A Public Finance Perspective, Becker Friedman Institute for Economics, The University of Chicago](#) - accessed 8/3/2026

<sup>77</sup> [Beckler Friedman Institute](#) – accessed on 8/3/2026



## E2.7 Conclusion

133. The TRA reviewed each factor when determining the likelihood of dumping should the measure no longer apply. The TRA reviewed all factors set out in [Section E](#). Having completed this assessment, the TRA has concluded that:

- It is likely that the producers of wire rod within the PRC have the ability to dump;
- It is likely that the producers of wire rod within the PRC have an incentive to dump;
- It is likely that there is a PMS within the PRC with respect to wire rod.

134. The TRA therefore concludes that dumping of the goods subject to review is likely to recur if the application of the anti-dumping duty were allowed to expire.



## Section F: Injury likelihood assessment

135. In accordance with Regulation 70(6)(b) and (c) of the Regulations, the TRA is required to consider whether injury to UK industry 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 relevant goods subject to review were to expire (“the likelihood assessment”).
136. To conduct the injury likelihood assessment, we have considered:
- The import volume of the goods subject to review;
  - The import volume price effects analysis on the prices of the like goods;
  - The state of the UK industry;
  - Other factors.

### F1 UK industry

137. 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.
138. We identified two UK producers of wire rod, 7Steel and British Steel. The collective output of the like goods by these producers constitutes a major proportion of the total production of those goods in the UK.
139. Therefore, for the purposes of this review, we have determined 7Steel and British Steel to be the UK industry in accordance with paragraph 6(1)(b) of Schedule 4 to the Act.

### F2 Volume analysis

140. When determining whether the UK industry is suffering injury, the TRA has considered whether there has been a significant increase in the dumped goods in the UK 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 imports subject to review

141. While import volumes of the goods subject to review are negligible during the IP, the TRA considers that the low volumes reflect the effect of the measure currently in place. These low import volumes do not preclude the likelihood of recurrence of injury should the measure expire.



**Table 11: PRC import volume and UK total imports**

	<b>Year 1 2021-2022</b>	<b>Year 2 2022-2023</b>	<b>Year 3 2023-2024</b>	<b>Year 4 2024-2025</b>
PRC import volume (index)	100	6	46	4
Total UK imports (index)	100	85	86	71
PRC volume relative to UK total imports (%)	0.10%	0.08%	0.09%	0.07%

Source: UK producer questionnaires and HMRC raw customs declarations data.

142. Table 11 shows the volume of wire rod imported from the PRC during the IP, alongside total UK imports. Total UK imports declined over the injury period, with the index falling from 100 in Year 1 to 71 in Year 4. PRC import volumes remained extremely low throughout the period. They did not show any sustained increase and accounted for less than 1% of total imports each year.

### **F2.2 Volume of imports relative to UK domestic production**

143. Imports from the PRC also accounted for a negligible share when viewed in the context of overall UK production volumes. The TRA therefore concludes that import volumes from the PRC were not significant when compared to UK domestic production.

### **F2.3 Volume of imports relative to UK domestic consumption**

144. Imports accounted for only a negligible share of UK consumption. The TRA therefore concludes that import volumes from the PRC were not significant relative to UK domestic consumption.

### **F2.4 Likelihood of significant import volumes to recur**

145. The TRA has assessed whether significant import volumes of the goods subject to review is likely to recur if the measure expired. The TRA's injury analysis focuses on assessing the likelihood of recurrence of injury in the absence of the measure.

### **Global export behaviour of wire rod from the PRC**

146. As established in the dumping likelihood assessment, global exports of wire rod from the PRC increased significantly over the IP. Growth was particularly strong between 2022 and 2025. This is shown by GTT data in Table 5 and Figure 1, which indicate a sustained year-on-year increase in both export volumes and export values of wire rod from the PRC to global markets.

147. This pattern indicates that PRC producers have increased the supply of wire rod to external markets over the injury period. This expansion occurred despite trade defence measures in multiple jurisdictions, demonstrating that PRC producers were able to place increasing volumes of wire rod in third country markets.



### Excess steel capacity in the PRC

148. The observed export trends are considered in the context of global excess steel capacity, in which the PRC plays a central role.<sup>78</sup>
149. The evidence shows that export volumes increase when the gap between production and domestic demand widens. This relationship is documented in OECD analysis of capacity utilisation and export behaviour in the global steel sector and is reflected in the comparative production, demand, and export data examined in the dumping likelihood assessment.<sup>79</sup>
150. This indicates that excess capacity in the PRC steel sector is structural and contributes to sustained export pressure. While this evidence relates to steel production more broadly rather than wire rod alone, it is relevant given the integrated nature of steelmaking and rolling operations and the reliance of wire rod production on upstream crude steel capacity.

### Ability to shift production towards wire rod

151. In addition to overall capacity conditions, the assessment considers whether PRC producers have the ability to adjust production and shift output towards wire rod in response to market conditions. The dumping likelihood assessment examined whether PRC producers can adjust production in response to market conditions. As shown in Table 5 of the dumping assessment, global exports of wire rod from the PRC increased sharply over the injury period, rising from approximately 3.06 mmt in Year 1 to over 6.31 mmt by the end of the IP.
152. This multi-year increase indicates that PRC producers have the capability to increase wire rod output and to allocate output towards export markets when commercial incentives exist. Industry and market reporting cited in the dumping likelihood assessment indicates that PRC mills have, in practice, diverted semi-finished steel billets from rebar production to wire rod rolling lines during periods of rebar maintenance or weak rebar demand, in order to maintain utilisation and manage surplus output.<sup>80</sup>
153. Additional industry analysis indicates that such production adjustments can be implemented over short operational timeframes through rolling line rotations rather than structural mill changes, reflecting a high degree of operational flexibility within the PRC steel sector.<sup>81</sup>

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<sup>78</sup> [OECD Steel Outlook 2025](#) - accessed 21/04/2026

<sup>79</sup> [OECD Steel Outlook 2025](#) - accessed 21/04/2026

<sup>80</sup> [Shanghai Metals Market, China Steel Market Commentary and Rolling Line Operations](#) - accessed 21/04/2026

<sup>81</sup> [CSIS, Circular Economy Solutions in China's Steel Industry](#) - accessed 21/04/2026



154. Taken together, this evidence indicates that PRC producers are able to allocate surplus steelmaking and rolling capacity towards wire rod production when market conditions permit.

### **UK import volumes and redirection risk**

155. The assessment then considers where additional export volumes could be directed, with regard to conditions in the UK market.

156. As previously stated, imports of the goods subject to review from the PRC into the UK remained negligible throughout the IP, as shown by HMRC data in Table 1 and Table 2 of the dumping likelihood assessment. The TRA considers that these low volumes reflect the continued application of the measure rather than a lack of production capability or export orientation on the part of PRC producers.

157. PRC producers expanded wire rod exports to a wide range of third country markets over the IP, as shown by the country specific export data in Table 8 and Table 9. These patterns indicate that PRC producers can redirect volumes towards markets where access conditions are more favourable.

158. This redirection risk is heightened by the scale of trade defence measures applied to PRC steel products globally. Publicly available data indicate that 62 countries have implemented a total of 207 trade remedy measures on steel products originating in the PRC.<sup>82</sup> These measures constrain access to alternative markets and increase competitive pressure in remaining open destinations. As described in the dumping assessment section [E2.4.5](#), PRC export prices are materially lower than UK import prices and provide an incentive to redirect exports to the UK. In this context, the removal of the UK measure would increase the attractiveness of the UK market as an outlet for surplus steel products.

### **Conclusion on likelihood of significant import volumes to recur**

159. The evidence indicates that steel production in the PRC has consistently exceeded domestic demand over the IP, resulting in a persistent surplus. It also indicates that PRC producers have demonstrated both the capability and operational flexibility to allocate this surplus toward wire rod production and export. The sustained growth in global wire rod exports between 2022 and 2025, combined with the evidence discussed above on production flexibility and export behaviour, supports a finding that PRC producers have a structural incentive to seek accessible export markets for surplus output.

160. Although imports from the PRC into the UK have remained negligible during the IP, the low imports volumes are likely to be the result of the measure currently in place. On this basis, the TRA considers that, if the measure were to expire, it is likely that significant volumes of imports of the goods subject to review from the PRC would recur.

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<sup>82</sup> [GMK Center, Global Restrictions on Steel Products from China](#) - accessed 21/04/2026



## **F3 Price analysis**

161. The TRA has assessed the effect of the dumped goods on prices of the like goods in the UK during the injury period by considering whether:
- a) there has been significant price undercutting by the dumped goods as compared with the price of the like goods produced in the UK; or
  - b) the dumped goods have depressed or suppressed domestic prices of the like goods produced in the UK to a significant degree.

### **F3.1 Price undercutting**

162. Imports of the goods subject to review from the PRC were negligible during the IP. As a result, there is insufficient evidence to assess actual price undercutting by PRC imports in the UK during IP. The absence of evidence of observed undercutting in the UK markets reflects the effect of the measure in place rather than underlying pricing behaviour.
163. Given this limitation, the TRA has considered price information examined in the dumping likelihood assessment for the purposes of assessing potential price effects. That assessment shows that PRC export prices for wire rod in external markets were consistently positioned at the lower end of the observed global price range, as shown by GTT export price data for major exporters in Table 10. This indicates that PRC producers are able to offer wire rod at comparatively lower prices where market access exists.

### **F3.2 Price depression**

164. Due to the negligible volume of PRC imports during the injury period, the TRA cannot establish whether PRC imports caused price depression in the UK market as there is insufficient evidence to attribute movements in UK prices to imports from the PRC during this period.

### **F3.3 Price suppression**

165. The TRA examined whether imports from the PRC may have suppressed UK prices during the IP. Given the negligible level of imports, there is insufficient evidence to establish price suppression attributable to PRC imports in the UK market.

### **F3.4 Likelihood of significant price undercutting to recur**

166. In line with Regulation 70(6)(c) of the Regulations, the TRA has undertaken a likelihood assessment of whether, if the measure were removed, imports of the goods subject to review from the PRC would be likely to undercut prices in the UK market.

### **PRC export pricing in other markets**

167. The dumping likelihood assessment shows that PRC export prices for wire rod in third country markets were consistently positioned at the lower end of the observed global price range throughout the injury period, as shown by GTT export price data (see Table 10). At



the same time, PRC export volumes increased substantially over the same period, as shown by global export data (see Table 5 and Figure 1).

168. This combination of rising export volumes, comparatively lower and declining export prices from 2022 to 2025, indicates that PRC producers are able to expand sales while maintaining low price levels where market access exists. The TRA considers this pricing behaviour relevant to an assessment of the likelihood of future price effects in the UK market.

### **PRC pricing during periods of higher costs**

169. The dumping likelihood assessment further shows that PRC export prices for wire rod responded differently to price movements observed in other steel producing regions during periods of cost volatility. During periods when prices in other markets increased in response to higher input and energy costs, PRC export prices increased but did not rise to the same extent as shown by comparative export price data, Table 10.
170. While this evidence does not, of itself, establish causation or demonstrate the existence of non-market factors, it indicates that PRC exporters may have the ability to maintain comparatively lower prices in markets they supply, even when cost pressures exist. The TRA considers this pattern relevant in a likelihood assessment of pricing behaviour, but not sufficient on its own to establish price undercutting effects during the injury period.

### **UK prices and market conditions**

171. UK import prices for wire rod during the injury period were higher than PRC export prices observed in third country markets, as shown by comparisons between UK import prices and PRC export prices in the dumping likelihood assessment (see Table 6 and Table 10). The UK market also remains structurally reliant on imports to meet domestic demand.
172. These conditions indicate that, if the measure were removed, PRC exporters would be able to enter the UK market at prices below UK industry price levels.

### **Overall assessment of future price undercutting risk**

173. When considered together with the existence of excess steel capacity in the PRC and the demonstrated ability of PRC producers to supply wire rod at low prices across multiple export destinations, the TRA considers that the conditions exist under which price competition from PRC imports, influenced by market distortions, would be likely to occur if the measures expired.
174. On this basis and having regard to the cumulative findings as described above, the TRA considers that, if the measure expired, it is likely that significant price undercutting by imports of the goods subject to review from the PRC would recur.



## F4 Economic factors analysis

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

### F4.1 Sales and domestic prices

176. The TRA assessed data submitted by UK producers of wire rod to examine the economic factors relevant to the position of the UK industry. This analysis considers the trends observed over the injury period across a range of indicators. The assessment is used to evaluate the current condition of the UK industry and to determine whether remains in a vulnerable state such that injury would be likely to continue or recur should the existing measure expire.

**Table 12: UK industry sales of wire rod, sold domestically**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
UK domestic sales by value (index)	100	67	55	52
UK domestic sales by volume (index)	100	83	78	80
UK domestic sales unit price (index)	100	81	71	65

Source: UK producer questionnaires.

177. UK industry domestic sales by value declined sharply over the injury period. Indexed sales value fell from 100 in Year 1 to 52 in Year 4, representing a sustained and significant downward trend, with the most pronounced reduction occurring between Year 1 and Year 2. While the pace of decline slowed down in the latter part of the period, sales values did not stabilise and continued to weaken through to the end of the injury period.
178. This persistent reduction in sales value indicates a material deterioration in the UK industry's ability to generate revenue from domestic sales of wire rod. The continued low level of sales value by Year 4 suggests that the UK industry has not recovered to a position of stability and remains vulnerable.
179. Domestic sales volumes also declined over the injury period, though to a lesser extent than sales value. Sales volumes fell from an index of 100 in Year 1 to 83 in Year 2 and 78 in Year 3, before showing only a limited recovery to 80 in Year 4. Despite this partial uptick, sales volumes remained materially below Year 1 levels at the end of the injury period.



180. The sharper decline in sales value relative to sales volume is explained by this sustained reduction in unit prices. This indicates that the UK industry was increasingly reliant on lower prices to maintain sales volumes. These trends occurred in a context where imports from the PRC were negligible and suppressed by the existing measure. As a result, the deterioration in domestic sales indicators cannot be attributed to current import volumes. This vulnerability means that, should the existing measure expire and imports resume at significant volumes and lower prices, the UK industry would be less able to absorb competitive pressure. The observed deterioration in domestic sales factors increases the likelihood that injury would recur if the measure were allowed to expire.

#### F4.2 Profit

**Table 13: Profitability of UK industry**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Net operating profit before tax for the like goods (index)	100	-175	-129	-135
Net operating profit before tax for the like goods - domestic sales only (index)	100	-659	-743	-487

Source: UK producer questionnaires.

181. UK industry net operating profit before tax for the like goods was negative throughout the entire IP for both overall like goods and for domestic sales of like goods. A conventional index based on positive baseline values would not meaningfully reflect changes in profitability over time. To allow a clear assessment of trend direction and magnitude, an alternative indexing approach has been used. This approach preserves the movement in losses over the injury period and allows year on year changes in profitability to be analysed.
182. The UK industry data showed a deterioration in overall net operating profitability between Year 1 and Year 2. The profitability index fell from 100 in Year 1 to -175 in Year 2, indicating a substantial deepening of losses over that period. While there was a partial improvement in Year 3, with the index recovering to -129, this improvement was not sustained. In Year 4, the index declined again to -135, remaining materially worse than the position observed at the start of the IP.
183. Profitability trends for domestic sales only show a more significant deterioration. The domestic profitability index declined sharply from 100 in Year 1 to -659 in Year 2, before weakening further to -743 in Year 3. Although there was an improvement in Year 4, with the index rising to -487, domestic operations remained significantly loss making at the end of the injury period and materially weaker than in Year 1.
184. The scale of the deterioration in domestic profitability indicates that the UK industry's losses were concentrated in its UK market activities.
185. Sustained negative profitability reduces the UK industry's ability to absorb competitive pressure, invest, or respond to renewed price competition. As a result, the weakened



profitability position of the UK industry increases the likelihood that injury would recur should the measure be allowed to expire and imports resume at significant volumes and lower prices.

### F4.3 Output

**Table 14: Output of UK industry**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Output of like goods by value (index)	100	87	66	64
Output of like goods by volume (index)	100	85	75	80

Source: UK producer questionnaires.

186. UK industry output showed a clear downward trend over the injury period. Output by value declined steadily from an index of 100 in Year 1 to 87 in Year 2, before falling more sharply to 66 in Year 3 and 64 in Year 4. This indicates a sustained reduction in the value of production over the period, with no evidence of recovery by the end of the injury period.
187. Output by volume followed a similar pattern, declining from an index of 100 in Year 1 to 85 in Year 2 and 75 in Year 3. While there was a partial recovery in Year 4, with the index increasing to 80, output volumes remained materially below Year 1 levels.
188. The divergence between output by value and by volume reflects weaker prices alongside reduced production levels. Taken together, these trends indicate a contraction in the UK industry's production activity and a deterioration in its overall output. The sustained reduction in output, particularly by value, indicates that the UK industry remains vulnerable.

### F4.4 Market share

**Table 15: Market share of UK industry**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
UK total market (index)	100	84	81	76
UK industry market share (index)	100	99	96	105

Source: UK producer questionnaires and HMRC raw customs declarations data.

189. The size of the UK total market for wire rod declined over the injury period. The UK total market fell from an index of 100 in Year 1 to 84 in Year 2, 81 in Year 3 and 76 in Year 4, indicating a contraction in overall demand within the UK market.
190. Over the same period, the UK industry's market share remained broadly stable. The market share index declined slightly from 100 in Year 1 to 99 in Year 2 and 96 in Year 3, before increasing to 105 in Year 4.



191. The UK industry maintained its market share in a context where imports from the PRC were negligible and suppressed by the existing measure. In circumstances where the UK industry is experiencing vulnerability in other factors, any loss of market share following expiry of the measure would be likely to place additional pressure on the UK industry.

#### F4.5 Productivity and employment

**Table 16: Productivity and employment of UK industry**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Total FTE employees for the like goods (index)	100	107	101	98
Average output in volume per employee for like goods (FTE) produced for domestic market only (index)	100	76	74	83

Source: UK producer questionnaires.

192. Employment levels in the UK industry remained relatively stable over the injury period. The total number of employees increased slightly in Year 2, with the employment index rising from 100 in Year 1 to 107, before declining to 101 in Year 3 and 98 in Year 4. By the end of the injury period, employment levels were marginally below those observed at the start.

193. Average output per employee for goods produced for the domestic market fell sharply from an index of 100 in Year 1 to 76 in Year 2 and to 74 in Year 3. Although there was a partial recovery in Year 4, with the index increasing to 83, productivity remained well below Year 1 levels.

194. The divergence between stable employment and falling output per employee indicates reduced efficiency and underutilisation of labour. Despite maintaining its workforce, the UK industry was producing less output per employee, reflecting lower production volumes and reduced utilisation of resources. This increases the industry's vulnerability, as any renewed import competition from dumped goods following expiry of the measure would further undermine productivity and place additional pressure on employment levels.

#### F4.6 Utilisation of capacity

**Table 17: Capacity and utilisation of UK industry**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Production capacity for like goods (index)	100	100	100	100
Production capacity utilisation for like goods (index)	100	85	74	79

Source: UK producer questionnaires.



195. UK industry production capacity remained unchanged over the injury period, with the capacity index stable at 100 in all four years. This indicates that there was no expansion or contraction in installed capacity for the like goods. However, capacity utilisation declined significantly. The utilisation index fell from 100 in Year 1 to 85 in Year 2 and to 74 in Year 3, before showing only a limited recovery to 79 in Year 4. Despite this partial improvement, utilisation levels at the end of the injury period remained materially below those observed at the start of the IP.
196. The combination of stable capacity and declining utilisation indicates an increase in spare capacity within the UK industry and points to weakening demand or reduced competitiveness rather than structural capacity constraints. Elevated levels of unused capacity indicate vulnerability for UK industry.

#### F4.7 Return on investment, cash flow and growth

**Table 18: Return on investment of UK industry**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Return on Investment for the like goods (index)	100	-154	1	58

Source: UK producer questionnaires.

197. UK industry’s return on investment for the like goods was negative throughout the IP. As with profitability, an alternative indexing approach has been used to reflect changes in the level of returns over time where all values are negative. This allows the direction and scale of movement in return on investment to be assessed, while acknowledging that returns remained below zero in all years.
198. The return on investment index deteriorated sharply from 100 in Year 1 to -154 in Year 2, indicating a significant worsening in the industry’s ability to generate returns from invested capital. While there was an improvement in Year 3 and Year 4, with the index increasing to 1 and 58 respectively, return on investment remained negative by the end of the injury period and did not return to Year 1 conditions. Persistently weak return limits the UK industry’s ability to reinvest, maintain assets and respond to market pressures, placing it in a disadvantageous position. This aligns with the deterioration observed in output and reflects the UK industry’s reduced ability to generate value from its operations. This weakened return increases the likelihood that injury would recur, and UK industry would be vulnerable if the measures were to expire.

**Table 19: Cashflow of UK industry**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Cashflow for the like goods only (index)	100	-136	-109	-98

Source: UK producer questionnaires.

199. UK industry cash flow for the like goods was negative throughout the injury period. As all values are negative, an alternative indexing approach has been used to illustrate changes



in cash flow trends. This allows the direction and scale of movements to be assessed, while recognising that cash flow remained negative in all years.

200. The cash flow index deteriorated sharply from 100 in Year 1 to -136 in Year 2. While losses stabilised to some extent in Year 3, with the index at -109, cash flow remained weakened in Year 4 at -98 by the end of the IP. This indicates a marked worsening in the UK industry’s ability to generate cash from its operations over the injury period.
201. The deepening of negative cash flow by the end of the injury period demonstrates continued financial vulnerability for the UK industry. Sustained negative cash flow limits the UK industry’s ability to finance day-to-day operations, service obligations and support ongoing production without relying on external funding. This position is consistent with the deterioration observed in profitability and return on investment and reinforces the overall weakening of the UK industry’s financial position. In these circumstances, the weakened cash flow position indicates that the UK industry would face increased pressure in responding to renewed, market distorted competition, increasing the likelihood that injury would recur should the measure expire.
202. The TRA assessed growth by reference to trends in other economic indicators, including sales, output and capacity utilisation. Over the injury period, these indicators did not demonstrate growth for UK industry. Instead, the observed declines in output and sales values indicate contraction rather than expansion. The absence of growth contributes to the UK industry’s vulnerability and increases the likelihood that injury would recur should the existing measure expire.

**F4.8 Inventories**

**Table 20: Inventory of UK industry**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Value of closing stock (finished goods only) for like goods (index)	100	108	57	59
Volume of closing stock (finished goods only) of the like goods (index)	100	123	65	76

Source: UK producer questionnaires.

203. The value of closing stock increased from an index of 100 in Year 1 to 108 in Year 2, before falling sharply to 57 in Year 3 and remaining low at 59 in Year 4. Inventory volumes followed a similar pattern. The volume index rose from 100 in Year 1 to 123 in Year 2, before declining significantly to 65 in Year 3. Although there was a partial increase to 76 in Year 4, inventory levels remained materially below Year 1 levels.
204. The reduction in both the value and volume of inventories after Year 2 is consistent with declining output and weaker sales conditions. Rather than reflecting improved efficiency or stronger demand, these trends indicate reduced production activity within the UK industry.



#### F4.9 Wages

**Table 21: Wages of UK industry**

	Year 1 2021-2022	Year 2 2022-2023	Year 3 2023-2024	Year 4 2024-2025
Median annual wage of employees who produce the like goods (index)	100	103	106	110

Source: UK producer questionnaires.

205. Median annual wages for employees producing the like goods increased steadily over the injury period. The wage index rose from 100 in Year 1 to 103 in Year 2, 106 in Year 3 and 110 in Year 4.
206. While the wages factor in isolation shows limited evidence of injury, it should be considered in the context of increasing wages alongside declining productivity and sustained financial losses suggest additional cost pressures on UK industry. This further contributes to vulnerability, as higher labour costs would be more difficult for the UK industry to sustain should the measure expire and imports resume, increasing the likelihood that injury would recur.

#### F4.10 Ability to raise capital

207. The TRA did not receive specific evidence on the UK industry’s ability to raise capital and therefore based its assessment on the financial indicators set out above. The TRA assessed the UK industry’s ability to raise capital by reference to its financial performance over the injury period. UK industry recorded sustained losses in profit, negative cash flow and negative returns on investment throughout the IP as evidenced above. This indicates a weakened financial position in which constrain the UK industry’s ability to raise capital or finance investment.
208. UK industry would be less likely to be able to secure funding or undertake investment should the measure expire, increasing its vulnerability to recurring competition from dumped imports.

### F5 Any other factors considered relevant

209. The TRA did not identify or assess any other factors relevant to the injury likelihood assessment beyond those set out above. The TRA notes that the range of factors assessed is consistent with those considered in the original transition review, and no additional factors have been identified that would alter the assessment of the UK industry’s position. The economic factors analysed were considered sufficient to assess the position of the UK industry and to determine whether it remains vulnerable such that injury would be likely to continue or recur should the existing measure expire.



## **F6 Conclusion on likelihood of injury assessment**

210. The TRA's assessment of the economic factors shows that the UK industry has experienced a deterioration in key indicators over the injury period, despite the existing measure remaining in place and imports from the PRC being insignificant. Sales, profitability, cash flow, ROI, output, capacity utilisation, and productivity all show continued financial and operational weakness, with market share maintained due to a lack of import competition.
211. The TRA excluded the factor, magnitude of the dumping margin, on the basis that the dumping margin was not recalculated.
212. These trends demonstrate that the UK industry remains in a vulnerable state. This vulnerability indicates that should the existing measure expire and dumping recur, injury to the UK industry would be likely to recur.



## Section G: Economic interest test

### G1 Introduction

#### G1.1 Legislative framework

214. 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.
215. In accordance with regulation 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.
216. 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.
217. In line with paragraph 25(4) of Schedule 4 to the Act, we have taken account of the following factors in conducting the EIT:
- a. the injury caused by the dumping of goods to the UK industry of the goods and the benefits to that UK industry in removing that injury;
  - b. the economic significance of affected industries and consumers in the UK;
  - c. the likely impact on affected industries and consumers in the UK;
  - d. the likely impact on particular geographic areas, or particular groups, in the UK;
  - e. the likely consequences for the competitive environment, and for the structure of markets for goods, in the UK; and,
  - f. such other matters as the TRA considers relevant.

#### G1.2 Evidence base

218. We received questionnaire responses from three UK producers:
- 7 Steel
  - British Steel
  - Speciality Steel UK Ltd



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

### **G2.1 Previous findings**

219. In TD0007, the injury likelihood assessment concluded that the UK industry was in a weak position and injury would likely recur, should the measures cease to apply.
220. It found that increased competition from low priced imports would likely exacerbate existing vulnerabilities, as reflected in relatively weak turnover and profitability trends, leaving the UK industry exposed to further injury

### **G2.2 Current assessment**

221. The latest injury likelihood assessment concludes that the underlying weaknesses previously identified have not materially improved, and may, in fact have deteriorated. Reliance on state support by one of the domestic producers, combined with persistently high energy costs – which place sustained pressure on prices – suggests that the UK industry remains highly vulnerable to further injury.
222. As a result, our previous findings that injury to UK producers would likely recur if the existing measures expired are reflective of the current situation of UK producers and remain relevant to this review.

## **G3 Economic significance of affected industries and consumers in the UK**

### **G3.1 Previous findings**

223. The previous analysis found wire rod to be a significant product for UK producers and downstream businesses but not very significant for importers and upstream businesses.
224. The assessment showed that among sampled businesses between 2016 and 2019, UK producers and some downstream businesses showed evidence of being vulnerable to negative economic impacts as reflected in their profits and turnover trends.

### **G3.2 Current assessment**

225. Based on available evidence, the overall structure of the supply chain remains largely unchanged, constituting upstream businesses, UK producers, importers, downstream businesses and consumers. Similarly, the main downstream sectors using wire rod – such as construction, automotive, and engineering – remain consistent, with no significant changes in demand.



226. The information provided in questionnaire responses confirms that wire rod remains a very important product for UK producers, as it forms an essential part of their manufacturing operations.
227. We did not receive any submissions from importers or downstream businesses.
228. Based on the available evidence, we consider our previous findings on the economic significance of the affected industries and consumers in the UK remain relevant to the current circumstances.

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

### **G4.1 Previous findings**

228. In TD0007, we found that UK producers would likely experience the largest benefit from varying the measures, while downstream businesses were likely to experience the largest cost impact from varying the measures. There were likely very limited impacts for consumers.
229. However, if the measures were revoked, cheap imports from the PRC could reduce UK producers' domestic sales by approximately 30% - 50%. While downstream businesses might benefit from lower input costs, wire rod forms a small part of their total costs, so final product prices and overall demand would likely remain unchanged.

### **G4.2 Current assessment**

230. The evidence provided in questionnaire responses suggests that while consumer preferences have remained largely stable, the UK wire rod market has seen a decline in overall consumption, reflecting market-driven shifts in demand, likely influenced by price movements and import pressures.
231. In their responses, the domestic producers note that even with the current measures, the market remains fragile. Therefore, allowing the measures to expire will negatively impact their domestic sales, site operations as well as plans for investment and expansion.
232. As no additional submissions were received from importers or downstream businesses, we consider the conclusions of our previous assessment of the likely impacts on affected industries and consumers remain relevant and reflect the current circumstances of affected industries and consumers in the UK.



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

### **G5.1 Previous findings**

233. Given the limited impact on deprivation and limited employment in areas linked to wire rod production, the previous assessment found that varying or revoking the measure was unlikely to materially impact any local authority with UK production sites. Also, there was no evidence of downstream businesses employing a significant share of the working-age population in any area.
234. We did not receive any evidence to suggest that varying or revoking the measure would have any impacts on groups with protected characteristics or other groups.

### **G5.2 Current assessment**

235. Consistent with previous findings, the evidence also suggests that the measures are unlikely to have any significant impact on particular areas, groups or those with protected characteristics.
236. 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. The assessment concluded that it was unclear whether varying the measure would significantly change the competitive environment.
237. However, if the measure were revoked, we found UK producers could lose approximately 30% to 50% of their domestic sales to PRC imports, potentially impacting the number or range of suppliers.

### **G6.2 Current assessment**

238. Our current assessment shows that UK producers' market share has declined slightly since the previous investigation from between 60% - 70% to a current level of between 55% - 65%. Evidence from questionnaire responses indicates that high energy costs have increased domestic prices. They also suggest that there has been a shift in consumer behaviour towards lower-priced imports, which has increased competitive pressure on domestic producers and contributed to a decline in their market share.
239. Despite these trends our analysis indicates that the UK wire rod market is concentrated, with two domestic producers alongside over 70 importers sourcing from third countries, supporting a steady supply of the product. Accordingly, we conclude that extending the measure is unlikely to limit the number or range of suppliers, the ability of suppliers to compete, incentives to compete vigorously, and choices and information available to consumers.

## **G7 Other relevant factors**

### **G7.1 Previous findings**

240. In TD0007, British Steel highlighted the social and environmental value of the UK steel industry and its wider employment impacts but did not provide supporting evidence. These considerations were addressed using available evidence in other parts of the EIT.

### **G7.2 Current assessment**

241. 7Steel noted that if the measures were allowed to expire, it would also impede the sector's ability to meet future investment and decarbonisation commitments. They did not provide any evidence detailing their roadmap towards decarbonisation.



## G8 Form of measure

242. The current measures are anti-dumping duties of 7.9% - 24% covering wire rod products imported from the PRC.

243. We found no evidence that an alternative form of measure would be more appropriate.

## G9 Conclusion

244. 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.

245. We have taken account of our previous findings from TD0007 and the prevailing market conditions in respect of the goods subject to review. Extending the measure would have the following positive impacts:

- there would be benefits to UK producers by reducing the risk of injury recurring, particularly in the context of current industry vulnerabilities, and helping to sustain their market position; and
- it would help maintain a level playing field, support continued utilisation of production capacity, promote a more stable environment for future investments and mitigate the risk of trade diversion of PRC wire rod exports to the UK.

246. The key negative impacts are:

- maintaining the measure may result in higher input costs for downstream businesses, including the construction and manufacturing sectors that rely on wire rod as an intermediate input.

247. While downstream users may face negative impacts, maintaining sustainable domestic supply to avoid longer-term disruption to the UK industry likely outweighs the potential for increased costs to downstream businesses.

248. Having considered the evidence submitted by interested parties and all the factors listed in the legislation. The TRA does not consider that the negative impacts are disproportionate to the benefits from extending the measures. 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

249. 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 E Dumping likelihood assessment](#)).
250. 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](#)).
251. 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](#)).

## H2 Intended final recommendation

252. The TRA's intended final recommendation to the Secretary of State is that the period of the application of the anti-dumping amounts to the goods subject to review be extended, pursuant to regulation 75(1)(c) and 75(2E) of the Regulations, so that it applies to all of 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 the expiry review not been initiated (see [Trade Remedies Notice 2022/07](#)).
253. 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:

**Table H1: Recommended ad-valorem duty rates**

Overseas exporter	Duty amount (%)
Valin Group	7.9%
All other overseas exporters from the PRC (residual amount)	24.0%

254. The description of the goods to which the measure applies (that is, the goods subject to review) is set out [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.
255. We intend to make this recommendation based on the conclusions we have reached, as summarised above.



## Annex A: Interested parties

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

<b>Table AA1: Summary of submissions on the public file received from Interested parties and contributors</b>			
<b>No.</b>	<b>Interested party name</b>	<b>Information received</b>	<b>Status</b>
1.	7Steel (UK) Limited	<a href="#">Application</a> <a href="#">Questionnaire Response</a>	Applicant / UK Producer
2.	British Steel Limited	<a href="#">Registration Form</a> <a href="#">Questionnaire Response</a>	UK Producer
3.	Specialty Steel UK Limited	<a href="#">Registration Form</a> <a href="#">Questionnaire Response</a>	UK Producer
4.	Ministry of Commerce of the People's Republic of China (MOFCOM)	<a href="#">Registration Form</a>	Foreign Government
5.	EEF Limited (UK Steel)	<a href="#">Registration Form</a>	UK Trade Body