



## Registration Form

### Suspension Investigation regarding anti-dumping duties on certain hot-rolled flat products of iron, non-alloy steel or other alloy steel from Ukraine

#### Case No. SR0025

Period of Investigation:	N/A
Deadline for response:	11 July 2022
Case Team Contact:	SR0025@traderemedies.gov.uk
Completed on behalf of:	Tata Steel UK Ltd
Party type (select):	<input checked="" type="checkbox"/> UK producer of hot-rolled steel products <input type="checkbox"/> Other

When you have completed this form, indicate the **confidentiality** status of this document by placing an X in the relevant box below and in the header. We strongly recommend this questionnaire to be completed on the computer, so this step is easy to complete:

- Confidential  
 Non-Confidential – may be made publicly available

Parties providing confidential information should also provide a non-confidential summary of that information or a statement of reasons why it cannot be summarised.



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Both copies must be returned to the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by **11 July 2022**.



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## Suspension investigation

The investigation will consider:

- Whether the market conditions have changed temporarily;
- Whether injury caused to the UK industry is unlikely to recur if the application of the anti-dumping amount were to be suspended;
- Whether the suspension is appropriate; and
- The appropriate length of any suspension.

## Relevant measure

This suspension investigation concerns anti-dumping duties on certain hot rolled flat products of iron, non-alloy steel or other alloy steel from Ukraine, as set out under [Taxation Notice 2020/17](#), which gives effect under United Kingdom (UK) law to the EU trade remedies measure specified in [Notice of Determination 2020/17](#).

## Goods subject to the measure

This suspension investigation covers certain hot-rolled flat products of iron, non-alloy or other alloy steel exported from Ukraine described as:

Certain hot-rolled flat products of iron, non-alloy or other alloy steel whether or not in coils (including 'cut-to-length' and 'narrow strip' products), not further worked than hot-rolled, not clad, plated or coated.

The following product types are excluded:

- products of stainless steel excluding grain-oriented silicon electrical steel
- products of tool steel and high speed steel
- products not in coils, without patterns in relief, of a thickness exceeding 10mm and of a width of 600mm or more \* products not in coils, without patterns in relief, of a thickness of 4.75mm or more but not exceeding 10mm and of a width of 2.5m or more.



The hot-rolled flat products listed above (the Goods) are currently classifiable within the following commodity code(s);

72 08 10 00 00	72 08 40 00 00	72 11 19 00 00
72 08 25 00 00	72 08 52 10 00	72 25 19 10 90
72 08 26 00 00	72 08 52 99 00	72 25 30 90 00
72 08 27 00 00	72 08 53 10 00	72 25 40 60 90
72 08 36 00 00	72 08 53 90 00	72 25 40 90 00
72 08 37 00 00	72 08 54 00 00	72 26 19 10 90
72 08 38 00 00	72 11 13 00 00	72 26 91 91 00
72 08 39 00 00	72 11 14 00 00	72 26 91 99 00

The commodity code 72 26 19 10 90 was replaced by commodity codes 72 26 19 10 91 and 72 26 19 10 95 on 9 July 2021.

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



## Instructions

### I – Who should complete this form

You should complete this form if you wish to comment on the proposed suspension.

### II – Note about confidentiality

Anyone requesting that information be treated as confidential should provide a non-confidential summary of that information or a statement of reasons why it cannot be summarised.

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

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures.

All information provided to the Trade Remedies Authority (TRA) in confidence will be treated accordingly, only used for this investigation, and will be stored in protected systems.

The non-confidential version of your submission may be placed on the public file, which is available on [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases).



## Section A – Your organisation’s interest in the investigation

To register your organisation’s interest in this suspension investigation, please complete the text boxes below.

A1. Please describe your interest in this suspension investigation:

TSUK is the major producer of the goods subject to review in the UK.

## Section B – Comments on the proposed suspension

The TRA is considering suspending the application of anti-dumping duties on the Goods from Ukraine.

During this suspension investigation, the TRA will consider whether market conditions have temporarily changed. We will assess whether, as a consequence of the change in market conditions, injury would be likely to recur if the measure were suspended.

Before making its recommendation, the TRA must give the UK industry opportunity to comment on the proposed suspension.

Therefore, we invite comment on the following considerations:

### B1. Change in market conditions

Market conditions have changed because of a significant reduction in both the output of the Goods by Ukrainian producers and in the export of these Goods to the UK from Ukraine. Furthermore, future residual domestic production capacity within Ukraine is likely to be focused on meeting domestic demand rather than servicing international markets. As a result, the global supply of the Goods has reduced and the price in the global market has increased.



Please provide any comments on the described change in market conditions that you consider relevant for the TRA to take into consideration during the suspension investigation:

To the best of our knowledge, the output of the goods subject to review indeed decreased in Ukraine since the war started. Export volumes of such goods from Ukraine have been very low (less than 1% of total imports into the UK) since the measures were imposed.

Ukrainian producers may not necessarily focus exclusively on the domestic market while the war is on-going, as domestic demand in Ukraine is unlikely to increase in such circumstances. While it could increase once the military actions have stopped, it would not prevent Ukrainian producers from supplying HRF to export markets, such as the UK, if it is commercially attractive. This would be in line with the purpose of the proposed suspension, that is to provide a temporary relief to the Ukrainian industry.

## B2. Temporary nature of the change

This change is of a temporary nature because rerouting of production and logistics is underway to improve supply lines. Reduced levels of production of the Goods are continuing in Ukraine and Ukrainian producers are likely to be seeking to move production to provinces that are less affected by the conflict. We are also aware of ongoing efforts to overcome the severe logistical challenges; by developing routes to the Baltic Sea and neighbouring Romania for shipping; and the construction of new railway terminals on Ukraine's Western borders to overcome delays to rail freight. Therefore, we consider that export of the Goods may resume in future.

Please provide any comments on the described temporary nature of this change in market conditions that you consider relevant for the TRA to take into consideration during the suspension investigation:

TSUK agrees that currently Ukrainian producers are struggling with a range of issues affecting their ability to produce the goods subject to review and deliver them to export markets and that most of these issues are indeed of a temporary nature.

## B3. Effect on the UK industry as a result of the temporary change in market conditions





UK industry has seen a rise in costs of the Goods as a result of the change in market conditions. This is amplified by the interconnectivity of the global steel markets, where hot-rolled steel is the raw material for many downstream steel products.

Please provide any comments on the described effect on UK industry as a result of the temporary change in market conditions that you consider relevant for the TRA to take into consideration during the suspension investigation:

TSUK has not been affected by the change in market conditions for HRF. However, shortage of Ukrainian supply of iron ore and coal may impact international prices on these raw materials, which will have a knock-on effect on TSUK's cost.

#### B4. Injury to UK industry

Injury to UK industry may be unlikely to recur if the application of the anti-dumping amount is suspended. The capacity for Ukraine to export the Goods has decreased and we consider it likely that Ukraine has a reduced capacity to dump the Goods due to the increase in costs of production and export.

Please provide any comments that you consider relevant for the TRA to take into consideration to assess whether injury would be likely to recur, if the anti-dumping measures against Ukraine were to be suspended as a result of the temporary changes to market conditions described above:

TSUK agrees that currently the capacity of Ukrainian producers to export HRF to the UK is reduced. While TSUK remains in a fragile condition due to the impact of the Covid-19 pandemic and high energy costs, Ukrainian imports of HRF are unlikely to cause injury to the UK industry in the short-term perspective.

## Section C – Additional information

C1. Please use the box to provide information about anything else you consider relevant to this suspension investigation:



Please refer to our written submission.