



Trade Remedies  
Authority

Trade Remedies Authority  
North Gate House  
21-23 Valpy Street  
Reading  
Berkshire  
RG1 1AF

The Rt Hon Kemi Badenoch MP  
Secretary of State for Business and Trade

Sent by email to [REDACTED]

19 May 2023

Dear Secretary of State,

### **Welded Tubes and Pipes Reconsideration**

You are currently considering the Trade Remedy Authority's reconsideration report regarding the Welded Tubes and Pipes transition review conducted in 2021. The case raises issues regarding the UK's trade relationship with Russia and I hope it will be helpful if I set out my perspective, for context, as you consider the report.

Since the invasion of Ukraine by Russia fourteen months ago, the TRA has been conscious of the United Kingdom's need, not simply not to facilitate trade with Russia, but to avoid any actions that could possibly give aid and comfort to the Putin regime. As we submit this highly technical report to you, we do so in the certain knowledge that no imports of Russian steel products can (or should) be exported to this country until the illegal invasion is over and the British government decides trade can resume.

Prior to the invasion, our 2021 transition review considered anti-dumping measures applying to Welded Tubes and Pipes from China, Russia and Belarus, to assess whether they were still needed after the UK's departure from the EU Customs Union. The Government accepted the TRA recommendation that the measure should be maintained for China and Belarus but that it should be revoked for Russia. The judgement on Russia rested on clear evidence: the product had not been imported from Russia or the Soviet Union to the UK since 1988 and we found no evidence that this was likely to change or that dumping was likely to occur.

That remains the case. Russian Welded Tubes and Pipes have not been imported for three decades. There is no prospect, until Russia's illegal war is over and the British government allows trade to resume, that they could be imported. We were then asked by a domestic steel producer to carry out a reconsideration of our findings, including our judgement on Russia. In conducting the reconsideration the key test has been whether the

transition review conclusions were reasonable on the basis of the facts available to the team in 2021, that is significantly before the invasion of Ukraine by Russia. In the reconsideration we found that the conclusions drawn by the TRA at the time on the threat of future Russia dumped imports were reasonable.

We are of course fully aware of the UK's trade policy towards Russia following the invasion. The TRA stands full square in support of the government position, indeed we moved quickly to make evidence-led recommendations to the government to reallocate Russian steel safeguard quotas and to suspend trade remedy measures applying to Ukraine. I would stress that this wholly technical evaluation can result in no imports of Russian steel products into the UK. While imports of Russian steel continue to be subject to the UK sanctions this reconsideration recommendation regarding Russia can have no real world impact.

I am setting this out in order to avoid any conceivable misinterpretation - whether accidental, mischievous or deliberate of the nature and purpose of this recommendation.

As this letter relates to our recommendation report, in the interests of transparency, the TRA will publish it on the case's public file.

Yours sincerely,



Simon Walker  
Chair

cc. Oliver Griffiths, Chief Executive, Trade Remedies Authority



Minister Huddleston, Minister for International Trade, Department of Business and Trade

