



Contributor Anti-Dumping Questionnaire

Transition review of anti-dumping measures

Case TD0001: Certain welded tubes and pipes of iron or non-alloy steel originating in the Republic of Belarus, the People's Republic of China and the Russian Federation

Case reference number:	TD0001
Period of Investigation (POI):	1 January 2019 to 31 December 2019
Injury period:	1 January 2016 to 31 December 2019
Deadline for response:	27 April 2020
Contact details:	Maria Lopez, TD0001@traderemedies.gov.uk
Completed on behalf of:	Community Trade Union

When you have completed this form, indicate the **confidentiality** of this document by placing an X in the relevant box below:

- Confidential
 Non-Confidential – will be made publicly available

Your completed response must comprise of this questionnaire document. Please note that you will have to provide **two copies of your response**. The questionnaire document must be provided in a **Confidential** and a **Non-Confidential version**. All four files should be returned to the Trade Remedies Investigations Directorate (TRID) using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **27 April 2020**.



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The scope of this review

Goods subject to review

This review covers **welded tubes and pipes** of

- iron or non-alloy steel;
- circular cross-section; and
- an external diameter not exceeding 168.3 mm

excluding line pipe of a kind used for oil or gas pipelines, casing and tubing of a kind used in drilling for oil or gas, precision tubes and tubes and pipes with attached fittings suitable for conducting gases or liquids for use in civil aircraft originating in **the Republic of Belarus, the People's Republic of China, and the Russian Federation**, destined for consumption in the United Kingdom (UK).

These welded tubes and pipes are currently classifiable within the following commodity code(s):

- ex 7306 30 41 (TARIC code 7306 30 41 20)
- ex 7306 30 49 (TARIC code 7306 30 49 20)
- ex 7306 30 72 (TARIC code 7306 30 72 80)
- ex 7306 30 77 (TARIC code 7306 30 77 80)

These commodity codes are only given for information.

In this questionnaire, these goods will be referred to as '**the goods subject to review**'. Any reference to 'goods subject to review' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

Any reference to '**like goods**' in this questionnaire refers to goods produced in the UK or imported to the UK from a country other than **the Republic of Belarus, the People's Republic of China, or the Russian Federation** which are like the goods subject to review in all respects, or with characteristics closely resembling them.

Please follow the instructions for each question to provide the appropriate information regarding the like goods or goods subject to review.



Instructions

Introduction

The Trade Remedies Investigations Directorate (TRID) of the UK's Department for International Trade will be carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) has decided to transition after EU exit. This transition review will consider whether the existing anti-dumping measures for certain welded tubes and pipes of iron or non-alloy steel originating from the Republic of Belarus, the People's Republic of China, and the Russian Federation ('goods subject to review') are necessary or sufficient to offset dumping and whether there would be injury to the UK industry if these measures no longer applied.

We are seeking your cooperation as a contributor to inform our review of whether the current anti-dumping measures should be maintained, varied or revoked.

Please refer to our guidance on what are the differences between interested parties and contributors in the following website:

<https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#interested-parties>.

Please provide all the information requested by **27 April 2020**. If you are unable to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension required and the reasons why. We will notify you of our decision. If we are able to accommodate an extension, a note to explain this will be placed on the public file.

We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary.

Each time you provide confidential information in the confidential version of your questionnaire, please provide a corresponding non-confidential summary (or a statement of reasons why you cannot provide this) in the non-confidential version of your questionnaire. If you do not submit a corresponding non-confidential summary or a statement of reasons where applicable, we may disregard the information you give us. The following section provides further information on what you need to do.

Please contact the Case Team if you have any questions about your response or if you have any difficulties in completing the questionnaire. For general information about trade remedies processes, please visit the following website:

<https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process>.

TRID investigates cases under the provisions of Trade Remedies (Dumping and



Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019 and under the Taxation (Cross-border Trade) Act 2018.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire by the due date. **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.

Please see <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#handling-confidential-information> for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

All information provided to TRID in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.



How to complete this questionnaire

Please read and follow all the instructions carefully. Your organisation is required to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses.

Please also note the following points:

- Please refer to the case reference number, TD0001, in any correspondence with TRID.
- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why.
- If the answer to a question is “zero”, “no”, “none” or “not applicable”, please write this rather than leaving the answer blank.
- If we ask for copies of additional documentation, please submit this information as appendices. Please ensure that these appendices are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English or Welsh should be accompanied by an English or Welsh translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- If you provide any figures, they should be reported net of tax.



SECTION A: General information

Identity and contact details

- Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Name (point of contact):	Melantha Chittenden
Address:	465c Caledonian Road, London, N7 9GX
Telephone No:	07772146553
Email:	mchittenden@community-tu.org
Website:	Community-tu.org
Legal name of organisation:	Community trade union
Legal structure (e.g. professional association, corporation, partnership, sole trader, limited company):	Trade union
Position in the organisation:	Research and policy officer
Year of establishment:	2004
Other operating names:	

- If you are representing a company, please also fill in the information below:

Company registration number:	
Place of registration:	

- Please explain in the box below what is your interest in this review (e.g. you a consumer of an end product that is made using the like good and/or good subject to review).

Community are a trade union representing steelworkers across the UK. In relation to this specific case our members at Tata Steel Corby and Liberty Tubes Tredegar would be affected.



SECTION B: Information relevant to this review

For each question that follows, please provide any information you feel is relevant to this review, providing supporting evidence where appropriate. If you do not have such information, please state so in your answer:

1. Please provide any information regarding the goods subject to review you might consider relevant to this transition review:

There is no general information we consider relevant to the review that is not outlined in detail in response to the questions below.

Appendix reference:

2. Please explain if you consider that the existing anti-dumping measures for the goods subject to review are necessary or sufficient to offset dumping.

Community would contend that the existing anti-dumping measures in place in the European Union and therefore in the UK whilst we undertake the transition period, are both necessary and sufficient to offset dumping from the countries in question.

Appendix reference:

3. Please provide any information which you think could assist the assessment of the likelihood of dumping occurring if the existing anti-dumping measures for the goods subject to review no longer applied.

If the anti-dumping measures were to be removed, there is a high likelihood that dumping from the countries in question would resume. This is due to a number of factors both within those countries and globally.

Steel producers in the Republic of Belarus, the People's Republic of China and the Russian Federation all have significant capacity whereby they either have significant quantities or have the potential capacity to be able to increase production of the product in question.

Steel demand looks to drop by 6.4 per cent globally over the course of 2020¹. In the UK orders have fallen by 45 per cent since the beginning of the current pandemic². This reduced global market will lead to conditions where countries are more likely to dump cheap steel and the UK market should not leave itself open to these practices by having reduced measures.

¹ <https://www.worldsteel.org/steel-by-topic/statistics/short-range-outlook.html>

² Eurofer survey on COVID-19 impact as of 10 June 2020



The UK have reduced production of steel throughout the ongoing pandemic due to reduced demand, reduced predicted demand for the remainder of 2020 and reduced order books. While much of the rest of the world has seen a significant decrease in production, the People's Republic of China have seen growth of 0.2%³. Indeed, production figures for May for the People's Republic of China show that during May steel output in the country hit a record high at 92.3 million tonnes which is up 4.2 per cent on the same month in 2019⁴. With stocks piling up, there is a likelihood that Chinese producers will look for markets overseas. The potential of this steel flooding the UK market is a serious risk and highlights the importance of robust measures to mitigate against this.

On 30th June 2020 the European Union confirmed that following a review into the anti-dumping measures in place to protect their member states from unfair practices and the dumping of steel these measures would be strengthened in order to reflect the damage done to the industry as a result of the coronavirus and the need to allow the industry time and the right environment to recover⁵. While robust EU measures are in place, if the UK were to remove those measures this would no doubt lead to significantly increased dumping in the UK as the only European country without robust measures.

Appendix reference: 1,2,3,4,5

4. Please provide any relevant information if you consider that there would be injury to the UK industry if the existing anti-dumping measures for the goods subject to review no longer applied.

Given the outlined chances of increased dumping above, we believe this would impact severely on the UK industry due to the price of dumped steel and the levels of demand in the UK. This is additionally concerning given the impact of the coronavirus on demand in the UK as outlined above.

The injury to the UK industry could be a factor in seeing both or either Corby and Tredegar close their doors. This would be an unacceptable situation, particularly given the significant amount of jobs the sites provide. Any factors that threaten the steel industry in Corby and Tredegar are therefore a threat to the jobs, and therefore the local economies.

The Corby site provides 550 jobs, while the smaller Tredegar site provides 63 jobs. In Corby unemployment currently sits at 6.5 per cent⁶, and in Blaenau Gwent in 2019 unemployment sat at 4.7 per cent⁷. In Corby in particular the steel industry is a significant employer in the local area and given the levels of unemployment this could have a severe impact on the local community and its economy.

³ <https://www.worldsteel.org/media-centre/press-releases/2020/April-2020-crude-steel-production.html>

⁴ <https://www.worldsteel.org/media-centre/press-releases/2020/May-2020-crude-steel-production.html>

⁵ <https://trade.ec.europa.eu/doclib/press/index.cfm?id=2161>

⁶ Office for National Statistics, 19th May release

⁷ <https://www.nomisweb.co.uk/reports/lmp/la/1946157401/printable.aspx>



Given that these jobs are highly paid for the areas they go on to support many more jobs both in the supply chain and the local communities. Overall, steel jobs are provide a salary that is 28 per cent above the national average and in Wales, where Tredegar is based, the average salary for someone working in the steel industry is 46 per cent higher than the average job in Wales⁸. If either Corby or Tredegar were to close as a result of weak trade defences those working on site would be unlikely to find work again, and almost certainly not work offering the same relatively high wages.

Furthermore, steel jobs are highly skilled, and alongside the steelworks themselves remaining an important national asset, so too are the skills of the steelworkers within them. As we saw when SSI closed its doors, when an industry leaves an area it is unlikely to return and on top of the lost livelihoods, and the damage to the local economy, there is also a loss of that vital skillset.

The UK steel industry has had a difficult period caused by; the dumping of steel from countries such as those in question but many others too, the prolonged uncertainty around our departure from the European Union, the lack of a level playing field in terms of energy prices and business rates, and most recently the coronavirus. If the existing anti-dumping measure were to be removed or allowed to expire, we submit that there is a high risk that there would be significant injury to the UK steel industry. Given all of the evidence provided, we strongly advise that the existing measures are maintained to protect our industry, our economy and steel jobs.

Appendix reference: 6,7,8

5. Please provide any information you might consider relevant regarding the economic effects on the UK of the existing anti-dumping measures for the goods subject to review.

Community believe that the existing measures are robust enough to reduce the likelihood of dumping of the products in question from the countries in question and there would be no negative economic impact of continuing these measures.

Appendix reference:

6. Please provide any other information you consider relevant to this review:

According to the ITUC Global Rights Index each of the countries addressed in this case – the Republic of Belarus, the People’s Republic of China and the Russian Federation – all breach fundamental workers’ rights⁹. Both Belarus and China appear in ‘Rating 5’ meaning there is no guarantee of rights, and Russia in ‘Rating 3’ meaning there are regular violations of workers’ rights.

⁸ <https://www.makeuk.org/insights/publications/new-deal-for-steel>

⁹ https://www.ituc-csi.org/IMG/pdf/ituc_globalrightsindex_2020_en.pdf



The lack of workers' rights go some way to explaining the difference in production costs of the products in question between the UK and the Republic of Belarus, the People's Republic of China and the Russian Federation, and mean that those countries are able to produce the steel at a cheaper overall cost. Those UK steel producers operating fairly and abiding by International Labour Organisations (ILO) standards should not see this unfairly damage their business because of the dumping of steel from those countries who do not abide by such practices, and therefore have cheaper steel prices.

It is imperative that ILO standards and in this specific review these countries workers' rights violations are included within the anti-dumping methodology if the review is to see a full picture of the likelihood of dumping and the impact on the British steel industry. We would like to see this review build on the approach taken by the European Union with regard to ILO standards.

Appendix reference: 9

Appendix

1. <https://www.worldsteel.org/steel-by-topic/statistics/short-range-outlook.html>
2. Eurofer survey on COVID-19 impact as of 10 June 2020
3. <https://www.worldsteel.org/media-centre/press-releases/2020/April-2020-crude-steel-production.html>
4. <https://www.worldsteel.org/media-centre/press-releases/2020/May-2020-crude-steel-production.html>
5. <https://trade.ec.europa.eu/doclib/press/index.cfm?id=2161>
6. Office for National Statistics, 19th May release
7. <https://www.nomisweb.co.uk/reports/lmp/la/1946157401/printable.aspx>
8. <https://www.makeuk.org/insights/publications/new-deal-for-steel>
9. https://www.ituc-csi.org/IMG/pdf/ituc_globalrightsindex_2020_en.pdf



SECTION C: Next steps and declaration

Next steps

Once you have completed all parts of the questionnaire the declaration on the following page should be signed by an authorised official.

Please submit this questionnaire and any other additional submissions you consider relevant for this transition review through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **27 April 2020**.

A confidential and non-confidential version of the questionnaire must be submitted. You can find guidance on how to complete confidential and non-confidential versions at <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#handling-confidential-information>.



Declaration

By signing this declaration, you agree that all information supplied in this questionnaire is complete and correct to the best of your knowledge and belief and understand that the information submitted may be subject to verification by TRID.

Organisation's name: Community trade union
Company registration number (if applicable):

03/07/2020

Date

Signature of authorised official

Alasdair McDiarmid, Operations
Director

Name and title of authorised official

Organisation's Stamp