



Producer 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:	Please contact: TD0001@traderemedies.gov.uk
Contact details:	Maria Lopez, TD0001@traderemedies.gov.uk
Completed on behalf of:	Tata Steel UK Limited

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 and the corresponding annex. Please note that you will have to provide **two copies of your response**. Both, the questionnaire document and the annex, must be provided in a **Confidential** and a **Non-Confidential version**. All four files should be returned to TRID using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **23 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

This questionnaire also asks for information about your company's production and sales of goods which are **like** the goods subject to review. 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.



Product Control Numbers

TRID uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

Characteristic	Field format	Explanation	Field length*
Outer finishing	Alphabetical	Indicate the outer finish of the product concerned G = Galvanized finish (zinc coated) B = Self colour ("black") O = Other (specify in the text box below)	1
Size (outside diameter)	Numerical	Indicate the outside diameter in mm e.g. 10.2 mm = 0102 88.9 mm = 0889 165.1 mm = 1651	4
End finishing	Alphabetical	Indicate the end finish of the product concerned P = Plain end B = Bevelled T = Threaded C = Threaded with couplings O = Other (specify in the text box below)	1
Wall thickness	Numerical	Indicate the wall thickness in mm e.g. 1.80 mm = 180 4.85 mm = 485	3

**The field length indicates the number of characters assigned to a characteristic within a PCN.*

In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When stating your PCNs, please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table above. Please use this PCN structure consistently throughout your questionnaire response, including the corresponding spreadsheet annex.



Example of a Product Control Number:

A welded tube or pipe with a galvanised outer finishing (G), an outside diameter of 10.2 mm (0102), a plain end finishing (P) and a wall thickness of 1.80 mm (180) constitutes the following Product Control Number: **G0102P180**.

Please review the PCN structure shown in the table above and include any comments on the PCN structure in the box provided.

The PCN structure is reasonable and consistent with that used by the EC in its investigations involving the like product.



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 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') is 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 UK producer of certain welded tubes and pipes of iron or non-alloy steel ('the like good') to inform our review of whether the current anti-dumping measures should be maintained, varied or discontinued.

Please provide all the information requested by **23 April 2020**. If you are unable to complete the questionnaire and the corresponding annex 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.

If you do not complete this questionnaire, you could be found to be non-cooperative. For more details on how this may affect you, please consult our operational guidance on non-cooperation: <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#non-cooperation>.



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 and the corresponding spreadsheet annexes 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.



Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation also covers all subsidiaries and any other associated companies, inside and outside the UK, which are involved in the production, sale, R&D, distribution and/or supply of the like good and/or goods subject to review

Please note, both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [Regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

If any of your subsidiaries or associated companies is also a UK producer of the like goods, they should complete a separate questionnaire.

Where your subsidiaries or associated companies are not producers but are involved in the trade of the like goods and/or goods subject to review, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.

What happens next

Once you have completed your questionnaire response including the corresponding annex and you have prepared confidential and non-confidential versions of these documents, you must upload these through our Trade Remedies Service at www.trade-remedies.service.gov.uk. Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required;
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.



Verifying the information you supply

TRID will verify, as far as possible, the information provided to it. As part of our verification process, we may conduct verification visits. Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided. Within your response to this questionnaire, please provide all formulas and steps used in your calculations.

To assist the verification of the information you provide, please ensure a record is kept of all material and documentation (including accounting and management records) used to support the completion of this questionnaire and the annex.

If we need to verify information that you provide by visiting your premises, the Case Team will contact you. A verification visits can take several days.

In the text box below please indicate any time periods between June and October 2020 where you would be unable to host a verification visit.

Verification arrangements to be confirmed.

Appendix reference:

After the verification visit, TRID will prepare a report and share a draft with you. TRID will then ask you to prepare a non-confidential copy of the report for the public record and provide reasons for why any information should be kept confidential.



How to complete this questionnaire

Please read and follow all the instructions carefully. Your company 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. To assist with verification please retain all such documents, your completed spreadsheet annex and any calculations made when developing 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.
- Please do not add or delete any sheets or remove any rows or columns from the spreadsheet annex.
- If the answer to a question is “zero”, “no”, “none” or “not applicable”, please write this rather than leaving the answer blank.
- Please note that both this document and the corresponding spreadsheet annex must be filled in. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you cannot present the information as requested, please contact your Case Team.
- 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).
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and metric tonnes interchangeably).
- Please ensure that all numbers which represent costs are reported as positive figures (e.g. for costs of £1,300.00 please enter £1,300.00 and not - £1,300.00)
- Please limit all sales/currency/income figures to two decimal places and apply a full point as a decimal separator (decimal point). Use the appropriate currency symbol or abbreviation (e.g. £1,300.00, GBP 1,300.00).



- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- For any exchange rate you may list in the annex(es), please submit an appendix proving the date and source for this rate.
- All figures should be reported net of tax unless otherwise stated.



SECTION A: Company structure and operations

A1 Identity and contact details

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

Legal name of company:	Tata Steel UK Limited
Legal structure (e.g. limited company, sole trader, partnership etc):	Private Limited Company
Year of establishment:	26/07/1988
Other operating names:	-
Company registration number:	02280000
Place of registration:	London
Name (point of contact):	[Personal details redacted]
Position:	[Personal details redacted]
Address:	30 Millbank London SW1P 4WY
Telephone No:	[Personal details redacted]
Email:	[Personal details redacted]
Website:	www.tatasteelurope.com

2. If you have appointed an external party to act on your behalf in this review, please provide their details and attach the letter of authority confirming TRID should contact them directly:

Name:	Not applicable.
Address:	
Telephone No.:	
Email:	
Confirm they have signed authority to act (Yes/No):	
	Appendix reference:



A2 About your company

1. Please describe the role of your company in the UK market for the like goods and/or goods subject to review (e.g. producer, producer/exporter, producer/importer or producer/distributor).

Tata Steel UK Limited (TSUK) is a UK producer of the goods subject to review, which it manufactures at a single production site in the UK located in Corby.

Appendix reference:

2. Please provide details of any changes in the legal form of your business over the past five years, for example, mergers, acquisitions and/or sales.

There have been no such changes.

Date	Legal form	Explanation of change
n/a		

+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to produce, sell, or trade the goods subject to review or like goods. These may include licences, permits, permissions or mining concessions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

None specific to the product concerned.

Appendix reference:

4. State whether your company is a member of any representative organisations (e.g. trade bodies/associations/Chamber of Commerce). If so, provide a copy of the relevant documentation.

The trade associations of most relevance to Tata Steel Tubes and this investigation include BCSA, BESA and BMTFA. At a wider level Tata Steel UK is a member of UK Steel, the trade association that represents the UK steel sector. TSUK is also a member of a number of other business organisations but none that is considered relevant to this investigation.

Appendix reference:



5. If applicable to your company, please attach the latest copy of the following documents:
- articles of association and all related documents;
 - business licence; and
 - proof of registration of the company with the competent authorities.

Please describe what you are submitting and provide appendix references for your attachments in the box below. Earlier copies from the date of establishment of the company until the present should be available upon request during any verification visit.

Articles of association for Tata Steel UK Limited and certificate of incorporation (Col) are provided (Col includes historical name changes)

Appendix reference: A2-5.2; A2-5.1A

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g. companies) are associated where they meet the definition of 'related persons' in section regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018.

1. Please demonstrate in a diagram and explain the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sale, R&D, supply and distribution of the like goods or goods subject to review. Clearly indicate the different production stages carried out by your company.

A diagram outlining the current organisational and simplified legal structure are attached (Appendix A3-1.1, A3-1.2).

Tata Steel UK Limited (TSUK) is part of the Tata Steel Europe (TSE) Group. The bulk of TSE's manufacturing and sales activities are in Europe. More details can be found on the website <http://www.tatasteeleurope.com/en/>.

The operating model of TSE focuses on a single sales and marketing team (managed on an end-use market sector basis), two operating hubs, a supply chain function organisation, integrated businesses and pan-Europe support functions (including R&D).

Tata Steel Tubes (TS Tubes) is the operating business within TSUK responsible for the manufacture of the product concerned. TS Tubes is part of the TSE



Downstream Operations Hub, and manufactures the product concerned at a single site at Corby in the United Kingdom.

Sales of the product concerned are managed by TSE's central Sales & Marketing function as noted above. Further details are provided in Section D.

Appendix reference: A3-1.1, A3-1.2



2. Please complete **Annex 1 – Associated companies**.

- Include your company's worldwide corporate structure and affiliations, including parent companies, subsidiaries and/or other associated companies.
- If your company is the subsidiary of another company, please provide the name of this company, as well as that of your company's ultimate controlling entity, their registration number(s) and place(s) of registration.
- Please provide the name, address, email address and telephone number for an appropriate representative from each company identified.
- Please list the activities carried out by each company identified (e.g. manufacturing, administration, sales).
- Indicate any shareholdings you have in the associated company and the shareholdings that the associated company has in your company.

A4 Board members and principal shareholders

1. Please complete **Annex 2 – Shareholdings**, providing a list of all your company's shareholders that owned more than 5% of its shares during the POI.

Where known, provide details of their activities. Also include:

- the composition of the Board of Directors and shareholders, including their roles and rights.
- your company's registered capital for the last five years;

Please provide this information for your company and for all its predecessor legal entities.

2. Explain your procedure for appointing the members of the Board of Directors.

Please refer to the [Articles of Association](#) referenced in A-2.5 above.

Appendix reference: [A-2.5.1A](#)



A5 Operational links with other companies or persons

1. In the table below, please list any long-term agreements you held with any company/companies located in the UK, the Republic of Belarus, the People’s Republic of China, the Russian Federation or third countries during the POI.

The list should contain all agreements, which relate to the production, trade, sale, R&D, supply and/or distribution of the like goods and/or goods subject to review or any services related to these; this could include:

- licencing agreements;
- technical patents;
- compensatory agreements,
- sub-contractor agreements; or
- tolling agreements.

Please provide:

- the name and address of the company with which you held these agreements;
- an explanation of the nature of the agreement;
- whether the company is associated to you;
- the company registration number and place of registration; and
- a copy of the agreement.

There are no such operational links relevant to the like goods.

Company name and address	Nature of agreement	Associated company (Y/N)?	Company registration number	Place of registration
n/a				
+ Add rows as required			Appendix reference:	



A6 Accounting practices

1. Please give the address where your company's accounting records are kept. If records are maintained in different locations, please indicate which records are kept at which location.

Records address	What records are held?
Finance Headquarters Tata Steel UK PO Box 42 Port Talbot Wales SA13 2NG	General ledger, all management and financial accounting records.

+Add additional rows as required

2. Please give the financial year convention your company uses for its accounts (e.g. 1 January – 31 December). If any changes have occurred with respect to this period or in your accounting practices over the last five financial years, please describe these changes with reference to any restatements in your financial accounts, including dates and reasons for them.

The Company accounting reference date is 31 March, and therefore financial accounts are prepared for the period 1 April – 31 March. There have been no changes to either the accounting reference date or accounting practice over the last 5 financial years.

Appendix reference:

3. Please describe your cost accounting system, including cost centres, standard costs, variances, setting of standards, etc.

Cost Centre Structure

Production and overhead cost centres are used to collect costs incurred across various production units and functional departments across the Tubes Corby site.

Standard Product Costs

Sales margins are reported against standard product costs, which are refreshed on an annual basis in conjunction with the businesses annual planning (budgeting) process.



Standard – Actual Variances

Variances against standard are measured and reviewed on a monthly basis

Appendix reference:

4. Explain any standard costs that have been provided in this questionnaire. Please state how frequently standard costs are revised and how are variances allocated.

Product costs and margins are routinely reported on the basis of standard performance levels, updated for the actual replacement cost of hot rolled coil feedstock. For the purposes of this submission, however, product costs and margins have been updated to reflect an allocation of direct and indirect volume and production variances, thereby giving an approximation of the actual cost of production.

Appendix reference:



5. For your company and any associated parties, inside and outside the UK, involved in the production, sale, R&D, distribution and/or supply of your like goods, please attach a copy of your audited accounts, including the audited consolidated package if applicable, covering the injury period.

If these audited accounts do not cover the injury period, please submit additional accounts. This may include a statement of financial position; income statement and other comprehensive income; statement of changes in equity; cash-flow statement; notes to the accounts and all reports; and auditor's opinion on these documents.

Audited financial statements are presented for Tata Steel UK Limited, the lowest level at which audited financial statements are prepared incorporating the financial results of the TS Tubes site at Corby. Audited financial statements are presented for the financial periods ending 31st March 2017, 2018 and 2019. Audited accounts for the most recent financial period ending 31st March 2020 are expected to be published during September 2020.

Appendix reference: A6.5-1, A6.5-2, A6.5-3

6. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period.

Not applicable.

Appendix reference:

7. Please attach copies of your statement of financial position reflecting the accounts at the start and at the end of the POI. Also, provide the income statement for the duration of the POI.

An excel summary file has been prepared covering the both the POI and also the preceding financial years as required. This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:

8. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the injury period.

The opening and closing Balance Sheet is presented for Tata Steel Tubes Corby. The Company's Trial balances are also presented covering the POI.



This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:



9. Please provide the total depreciation figure as per your financial statements. Ensure you keep a record of how you calculated the depreciation figure and reconcile the amount to your financial statements.

Not applicable. Assets are fully impaired (depreciated) on an on-going and historic basis for Tata Steel Tubes Corby and as such the site has no annual depreciation charge.

Appendix reference:

10. For your company and any associated parties involved in the production and/or trade of the like goods or goods subject to review, please attach copies of relevant management accounts or internal management reports (e.g. profit and loss statement) for the profit centre(s) that includes these goods. Please provide these reports for the injury period.

Management accounts, incorporating Income Statement, Balance Sheet and Cash flow statement, are appended for TS Tubes Corby. This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:

11. If your company is part of a group of companies, please attach a copy of the consolidated accounts of the group for your most recently completed financial year.

Consolidated audited financial statements are presented for Tata Steel Europe Limited for the financial periods ending 31st March 2017, 2018 and 2019. Audited accounts for the most recent financial period ending 31st March 2020 are expected to be published during September 2020.

Appendix reference: [A6.11-1](#); [A6-11.2](#); [A6-11.3](#)

12. Please provide a detailed description of your management information system and a brief description of your financial accounting system, and attach:
- your company's chart of accounts;
 - a chart showing the main components of your management information system (i.e. the accounting system, costing system, payroll system, material management system, warehouse management system) and their links.

The Management Information System in operation at the TS Tubes site, Corby is based upon three principal platforms:



1. Physical production, despatch and stock data held and processed on an integrated production system, with interfaces into a data warehouse and reporting tool.
2. A standard costing management control system.
3. An integrated financial reporting and managerial accounting system that records all accounting transactions.

Appendix reference:



13. With reference to the chart provided in the question above, please provide the names of the system(s) you use for financial accounting, sales and production. If you use more than one system, please explain how the systems interact (including whether electronic or manual).

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

14. Describe your accounting methodology for all of the following points:

- the recognition and/or timing of income and the impact of discounts and rebates, sales returns, warranty claims and intercompany transfers;
- the depreciation and amortisation methods, and the periods used by your company for each class of asset such as intellectual property, plants, buildings, machinery and equipment (including average useful life and the methods for calculating this);
- provisions for bad or doubtful debts;
- the accounting treatment of general expenses and the extent to which these are allocated to the cost of goods;
- the accounting treatment of finance costs and how these are allocated to the cost of goods;
- costing methods (for example, by tonnes, units, revenue, activity, direct costs, standard costing etc.) and allocation of costs shared with other goods or processes;
- your inventory valuation methods for raw material, work-in-process, and finished goods, for example First-In-First-Out (FIFO) or weighted average cost;
- aging/obsolete inventories, your write-off and/or write-down process(es);
- valuation methods for scrap, by-products or joint products;
- valuation methods for damaged or sub-standard goods generated at the various stages of production;
- valuation and revaluation of fixed assets, and the subsequent treatment of excess depreciation/amortisation;
- treatment of any subsidies or grants;
- treatment of foreign exchange gains and losses arising from transactions and from the translation of balance sheet items;
- restructuring costs, costs of plant closure, expenses for equipment not in current use and/or plant shutdowns;



- losses arising from transactions and from the translation of items of the statement of financial position; and
- restructuring costs, costs of plant closure, expenses for equipment not in current use and/or plant shutdowns.

Please refer to the notes to the accounts provided in the audited financial statements referenced in A6-5 and A6-11 above.

Appendix reference:



SECTION B: About your goods

B1 Understanding your like goods

The goods subject to review are defined as above in section [goods subject to review](#).

We use Product Control Numbers (PCNs) to help us compare the goods subject to review and the domestic like goods. When you are completing this section, you must apply the PCN system set out in the section [Product Control Numbers](#) to describe your goods consistently throughout your responses. If you don't use the PCN table correctly, this could limit TRID's ability to use the information you provide.

1. Please complete **Annex 3 – PCN comparison**, describing to what degree all your like goods (by model) are comparable to each PCN of the goods subject to review.

In the annex, please detail the goods that you manufacture in the UK which are like the goods subject to review and elaborate on the degree of likeness. As part of this, please provide details of your like goods and the goods subject to review regarding the following characteristics:

- physical likeness, including their production processes, interchangeability, raw materials used, degree of model differentiation, tariff classification;
- commercial likeness, including their interchangeability, channels of distribution and sale, pricing; and
- other relevant characteristics.

If your company manufactures a range of like goods, list this information for each individual model in the range.

Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.

Please refer to Annex 3. This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:



2. If you have identified differences in **Annex 3 – PCN comparison** between the goods subject to review and the like goods you manufacture, please estimate the difference in cost to make and sell, and sales price difference between each PCN internal control number in the Annex and explain those differences and the effect they have in the text box below. Where applicable, this should be on a per unit basis. Describe how you established your estimations and substantiate with evidence where possible.

Please refer to Annex 3. This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:

3. In the text box below, explain the internal coding system your company uses to classify your range of like goods. If your company uses multiple internal reference codes across departments, cross-reference each one with the codes used in the production department, the sales department and the invoice code in the annex. Also, cross-reference your internal coding system with any sales (invoice codes) made via associated companies.

Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each model where available.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information. Relevant technical documentation is attached for information.

Appendix reference: B-1.3

B2 Understanding the UK market

1. Please explain the end use of the goods subject to review and the like goods. If there are multiple uses for the like goods, list them and, where possible, estimate what proportion of your sales goes to each end use.

The tubes subject to review are mainly used in conveyance applications such as heating, ventilation, air conditioning and fire defence. Some tubes might also be used in construction applications like handrails and scaffolding.

A full product description of the Tata Steel Tubes branded conveyance products is included in the relevant technical brochures, and also on the Tata Steel Tubes website, providing details of the full technical delivery conditions.



Appendix reference:

2. Provide a general description of the UK market for the goods subject to review and the like goods, including the nature and conditions of competition within the overall market. In your answer please refer to all of the following points:

- the nature of competition within the overall market;
- the degree of price sensitivity;
- the trends and drivers of demand, including causes of demand fluctuations and any factors contributing to overall market growth or decline;
- distribution and marketing;
- general users/consumers/customers;
- the degree of competition between the goods subject to review and the like goods;
- market segmentation;
- government regulation or tax;
- developments in technology affecting the characteristics, demand or the production process of the goods;
- other commercially significant goods which could be substituted for your like goods and the like goods or goods subject to review imported into the UK; or
- any other factors that influence the market (e.g. seasonality).

Tata Steel Tubes Corby supplies material to established distribution channels in the UK, and some export markets. These distribution channels are independent trading companies who purchase the material directly from us (and other producing mills), stock the material, and then sell to the fabrication and installation companies who use the material. The distribution companies will sell Tata Steel tubes together with a range of other products such as fittings and flanges. Occasionally these distributors will undertake further processing of the material before it is issued to the end user. In addition to the distribution channels mentioned above, TS Tubes Corby sells to some specialist end users, such as fitting manufacturers.

In summary, the UK market can be characterised as having fierce competition. Key drivers of market demand are developments in the construction and installation market

Appendix reference:



SECTION C: Costs and production

C1 Cost to make and sell

1. Please complete **Annex 4 – Cost to make and sell**.

- Report your total cost to make and sell the like goods domestically.
- Please clearly separate your costs of production (direct manufacturing costs and indirect costs), from your administrative, selling and general expenses (AS&G).
- All values entered in the tables should be totals for the POI by PCN.
- Please note that headings of each row (e.g. raw materials, energy, etc.) should be adapted to suit the naming conventions of your own cost accounting system.
- When stating labour costs, please ensure you include all labour costs, directly or indirectly incurred by any activity related to the like good.

2. Please state the cost allocation and apportionment method used for each PCN for the POI, including an explanation of the allocation and apportionment method for each type of cost. If you have applied a method different from your standard allocation or apportionment, please explain the reasons.

All costs are based on Standard Cost allocation, adjusted for actual coil prevailing in the quarter and an apportionment of any of the under/over recovery of manufacturing variances.

Appendix reference:

3. Please list, and explain, your labour, manufacturing overheads and AS&G costs for domestically sold like goods. Describe the individual components of these costs and provide detail on how these costs are paid.

Please ensure you include the following costs if applicable and report them in a separate row:

- delivery costs; and/or
- regulatory compliance costs.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:



4. Please list all inputs (e.g. raw materials, energy, labour, etc.) for the production of the like goods including their HS subheadings. Indicate the source of your inputs and whether they are imported or domestically sourced.

This information is by its nature commercially confidential and would harm TSUKs commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

5. If your company incurred any extraordinary costs (such as start-up or ramp up costs) during the POI, please provide details of these costs, explaining why they were extraordinary and how they have been included and amortised/depreciated in your accounts. Please sufficiently detail their nature and effect on the cost of production.

No extraordinary costs have been incurred during the POI – the only exceptional costs incurred relate to the impairment of any capital investments during the POI – assets are fully written off (and not depreciated) on capitalisation

Appendix reference:

6. For the injury period, please provide the depreciation incurred on the assets used for the production of the like goods.

Not applicable. Assets are fully impaired (depreciated) on an on-going and historic basis for Tata Steel Tubes Corby and as such the site has no annual depreciation charge.

Appendix reference:

7. Please explain how you finance your production of like goods, your sources of finance, whether there are any costs of finance associated with the production of like goods, and how you have reported these in **Annex 4 – Cost to make and sell** and your company's accounts.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

C2 Cost reconciliation

The information you provide in this section will help us reconcile the values provided in section C1 Cost to make and sell.



1. Please complete Annex 5 – **Cost reconciliation** starting from the bottom of the table. Please only fill in white cells and update the formulae as required. If you use any additional formulae to complete the table, please include these. Insert additional columns or rows if needed.

- Cost of production and quantity of like goods during the POI:
For your like goods, enter the cost of production and the quantity produced during the POI as reported in Annex 4 – Cost to make and sell. Please provide this information for like goods produced for the domestic market and for the export market.
- Cost of production and quantity of any other goods during the POI:
If you produce goods other than the like goods, please provide the costs of production and quantity produced for each of these goods during the POI. Please note, that the headings (e.g. “Cost of production/quantity of good A during the POI”, “Cost of production/quantity of good B during the POI”, etc.) should be adapted to suit the names of your goods which are not the like goods.
- Total cost of **production**/quantity of all goods during the POI:
Please provide the total cost of production and total quantity of all your goods produced during the POI as shown on your management accounts.

If this figure does not reconcile with the totals of the cost of production and quantity data provided for the previous bullet points, the table will show a variance. Please use the text box below to provide an explanation for the shown variance.

Cost reconciles to management accounts, with the exception of the cost of impairment, as this is an exceptional item and therefore does not reflect the true cost of manufacturing.

Appendix reference:

- Change in finished goods inventory:
Please provide the change in finished goods inventory for all your goods during the POI. This can be established by comparing the value of your finished goods inventory at the beginning of the POI with the value of your finished goods inventory at the end of the POI or by obtaining the difference between the cost of goods sold and cost of production.
- Total cost of all goods **sold** during the POI:
Please provide your total cost of all goods sold during the POI, as shown on your management accounts.

If this figure does not reconcile with the sum of the total cost of production of



all goods during the POI and the change in finished goods inventory, the table will show a variance. Please use the text box below to provide an explanation for the shown variance.

Figure reconciles without adjustment

Appendix reference:

- Difference in total cost of all goods sold between POI and accounting periods: If the POI and your accounting period are different, please enter the difference between total cost of all goods sold during the POI and the total cost of all goods sold during the accounting period.
- Total cost of goods all sold as shown on your audited Income Statement: Please provide the total cost of goods sold as shown on your audited Income Statement for the most recent financial year.

2. Please use the text box below to reference any source documentation for the data provided in this annex.

Reference the file "Corby Financial Statements – 2016 to 2019". This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:

C3 Production process

1. Please provide a written summary and a diagram/flow chart of your production process for the like goods that you produce in the UK.

The production process varies dependent on tube dimension. Sizes up to and including 139.7mm nominal OD are manufactured using the hot stretch reduction EWSR 2 mill at Corby. Conveyance tubing with dimensions in excess of 139.7mm and up to 150mm nominal OD are manufactured using the electric resistance welded (ERW) cold process on the 6" mill, also located at Corby. 6" products are typically heat treated through an off-line furnace to deliver technical advantages compared to comparative cold-formed alternatives. Smaller cold-formed tubes may also be made on our Cold-formed Mill No1 (CFM1) and again, undergo heat treatment via an offline induction heating process.

Surface Finishes

A variety of surface finishes were offered to the market during the investigation period, including:

- Hot dipped galvanised coating
- Shot-blasted and painted or powder coated



- Polymer coated (PP, 3 layer PE) or epoxy coated

A variety of end finishes may be applied at the Corby site, including:

- Screwed ends
- Screwed and socketed ends
- Plain ends
- Grooved ends
- Bevelled ends

A diagram showing the production process is attached at Appendix C3-1.

Appendix reference:C3-1

2. Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. Please describe the manufacturing process of the like goods, its level of complexity and the investment of capital involved. If a production process is performed outside the UK, please explain the nature of the activity and where this process step takes place.

All of the production takes place in the UK. Where value adding takes place is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

3. Please describe the theoretical and actual weights of the like goods you produce. Please explain how you set and calculate these weights.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

4. Please explain the mass tolerance of the production of the like goods you produce.

Please refer to the attached standards as Appendix C-3.4

Appendix reference:C-3.4

5. If you use the same production equipment and machinery for the production of goods other than the like goods, please list these and explain your allocation method.



For common assets, where required, an apportionment of relevant sales volumes has been used to determine cost apportionment.

The non-like goods are those outside the product scope, mostly due to shape (i.e. rectangular, square). Information on the % of output of like goods and on the orderbook is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

6. Please provide the physical addresses (including town/city and county) of all your company's UK sites/facilities involved in the production of the like goods.

Company name	Physical address
Tata Steel UK (Tubes UK)	Tata Steel Corby Works PO Box 101 Weldon Road, Corby Northants NN17 5UA

Appendix reference:

+Add additional rows as required



C4 Joint products and by-products

1. Please explain any waste, scrap or by-products related to the production of the like goods. Please explain:
 - how you differentiate your waste, scrap and by products;
 - what you do with your waste, scrap and by-products;
 - how any income or cost from waste, scrap or by-products is recorded;
 - the average waste, scrap and by-product ratio resulting from the production process of the like goods.

Scrap and non-prime are the two main elements of non-prime products. These are produced either through the process itself e.g. slitting trim, end cut offs etc or post-production, should the product not meet the final product specification. Details of how this is treated in the accounts and on the waste/scrap ratio for the like goods is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

2. Please explain how your costs of production (per unit) differ between the like goods and its joint products, if applicable. Comment on the reason for this difference and explain your method(s) of calculation.

N/A

Appendix reference:

C5 Raw material (RM) and input purchases

1. Please complete **Annex 6 – Raw material and input purchases**, detailing the principal purchases used in the production of the like goods during the POI by your company.
 - Please provide a complete breakdown for any inputs that account for more than 1% of the cost to make and sell of your like goods. Please include all purchases of these materials used during the POI.
 - For each reported purchase transaction, describe the input and its characteristics (e.g. grade, purity).
 - If your energy costs constitute more than 1% of your production costs, please also include energy purchases in the annex.
 - All figures should be reported net of tax.



2. Please provide an invoice and any supporting documents for two of your purchases stated within Annex 6 – Raw materials and input purchases. Use the box below to give an overview of any supporting documents provided.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:

3. If some of the inputs (e.g. raw materials, energy) used in the production of your like goods are produced by your company or an associated party, please indicate this in **Annex 6** in the column 'Source'. In the text box below provide details of this arrangement and attach documentation demonstrating any agreements you have.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:

C6 Purchases of like goods and/or goods subject to review

1. Complete **Annex 7 – Purchases of the goods**. This should include information relating to your company's total annual purchases of the like goods and/or goods subject to review over the injury period. Please list for each year every country you have purchased from in a separate row.
2. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of like goods and/or goods subject to review.

Not applicable. Nil purchases.

Appendix reference:



SECTION D: Sales

D1 Domestic sales

1. Please complete **Annex 8 – Transaction by transaction (T by T) domestic sales:**
 - Please report each goods sale on a given invoice with a different PCN or invoice line as a separate transaction
 - These should include all your domestic sales and returns of the like goods and/or goods subject to review for the POI. Include the like goods you have produced, like goods that you have purchased and resold and/or goods subject to review that you have purchased and resold.
 - All information in a row should refer to the individual PCN displayed in the first column of that row.
 - Please report returns or after invoice discounts as negative (-) sales figures.
 - Please ensure that you correctly categorise each sale by PCN.
 - For transactions or invoices that consist of multiple PCNs, the same invoice number should be referenced.
 - All figures should be reported net of tax.

Please contact the Case Team if you can't provide the relevant information in sufficient detail.

2. Attach sales contracts for the top five customers by volume in Annex 8 – T by T domestic sales that you have sold like goods to in the POI.

This information on sales contracts is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference: D-1.3

3. Select examples of domestic sales of like goods to two different customers included in Annex 8 – T by T domestic sales. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of such information without revealing sensitive information.



Appendix reference: D-1.3

D2 Export sales

1. Please complete **Annex 9 – Export sales**.

- These should include all your export sales of like goods for the POI.
- Please ensure that you correctly report your total volume and total value for your export sales per PCN.
- All figures should be reported net of tax.

D3 Sales reconciliation

The information you provide in this section will help us reconcile the values provided in [sections D1 Domestic sales](#) and [D2 Export sales](#).

1. Please complete **Annex 10 – Sales reconciliation** starting from the bottom of the table. Please only fill in white cells and update the formulae as required. If you use any additional formulae to complete the table, please include these. Insert additional columns or rows if needed.
- Sales revenue and quantity of like goods during the POI:
For your like goods, enter the sales revenue and quantity for domestic and export sales during the POI as reported in Annex 7 and Annex 8.
 - Sales revenue and quantity of all goods during the POI:
If you produce goods other than the like goods, please provide the sales revenue and quantity of each of these goods during the POI. Please note, that the headings (e.g. Sales revenue/quantity of good A during the POI, Sales revenue/quantity of good B during the POI, etc.) should be adapted to suit the names of your goods which are not the like goods.



- Total sales revenue/quantity of all goods during the POI as stated in your management accounts:
Please provide the total sales revenue and total quantity of all your goods during the POI as shown on your management accounts.

If this figure does not reconcile with the totals of the sales revenue and quantity data you provided for the previous bullet points, the table will show a variance. Please use the text box below to provide an explanation for the difference.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

- Difference in total sales revenue of all goods between the POI and accounting periods:
If the POI and your accounting period are different, please enter the difference between the total sales revenue of all goods during the POI and the total sales revenue of all goods during the accounting period.
- Total sales revenue of all goods as per Income Statement:
Please provide the total company sales revenue of all goods as shown on your audited Income Statement for the most recent financial year.

If this figure does not reconcile with the sum of the total sales revenue of all goods during the POI and the difference in sales revenue of all goods between the POI and the accounting period, the table will show a variance. Please use the text box below to provide an explanation for this difference.

Figure reconciles

Appendix reference:

2. Please use the text box below to reference any source documentation for the data.

Corby Data Warehouse, local scrap despatches reporting and "6.7 Corby Financial Statements – 2016 to 2019". This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:



3. Additionally, in **Annex 10**, please provide quantitative estimates (e.g. projections or forecasts) for the sales revenue and quantity of like goods as well as all other goods you produce on the UK market for the next five years.



D4 Distribution channels and price setting

1. Please describe the sales procedure from when the order is received to the delivery to the first independent customer, for both, sales made directly and through associated companies.

Customer orders are entered onto our in-house computer system which generates instructions to the mill, and product is manufactured based on those instructions.

Sales invoices are automatically generated when vehicles pass over the weighbridge prior to leaving the site. Tata Steel standard terms and conditions of sale are for payment 30 days net from date of invoice. Customer payment is normally made by electronic BACS or CHAPS transfer.

TS Tubes Corby supports the sale of the product concerned with extensive technical marketing.

Appendix reference:

2. Please describe each step in the sales negotiation process, from the first contact with the customer up to and including any after-sale price adjustments (commissions, discounts, rebates and allowances). Include a description of how the process varies for different customer categories.)

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of all aspects without revealing sensitive information.

Appendix reference:

3. Please explain how you calculate your prices, and list the main factors impacting on the sales price of the like goods. Do they vary between customers?

Prices are influenced by market demand and the level of competition. Prices are negotiated on an individual customer basis as part of the overall commercial package.

Appendix reference:

4. Please provide a list of associated customers who purchase like goods. Explain the nature of the association and any effect it has on the terms of sale to that customer.

None

Appendix reference:



5. Attach copies of distributor or agency agreements that you have relating to the sale of like goods.

None	
	Appendix reference:



6. Provide copies of price lists for the like goods for the POI.

There are no general price lists published for the like goods.

Appendix reference:

7. If any price reductions have been applied to any of your sales of like goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.

- Explain the terms and conditions that must be met for any price reduction.
- Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.
- If you have issued any credit notes that are not reflected in invoice prices, provide details of the criteria for issuing such notes and the impact that they have on prices (both past and future).

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

8. Please provide details of your distribution network for like goods, if you have one. Do your sales usually include delivery? Explain how you calculate delivery costs and how they vary between customers.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:



D5 Captive sales and captive use

1. Complete **Annex 11 – Captive sales and use**. This should include transaction-by-transaction information for the POI detailing your company's individual transfers of the finished like good for internal use, e.g. further processing, transformation, or assembly, by your company (captive use) or by an associated company (captive sales).
 - Please use the PCN table in section Product Control Numbers to categorise each of these transfers by PCN.
 - In the destination column, indicate if the transaction was destined for captive use (internal use on your manufacturing site) or captive sales (internal use of your company's product by an associated party).
 - If the like good was used internally by an associated company, please state its name in the appropriate column. Otherwise, please write not applicable N/A.
 - In the 'use' column, specify how the like goods were used by yourself or the associated party.
 - In the 'value' column please assign a market value to the like goods transferred.
2. Please comment on whether your captive use or captive sales of the like good would be affected if the existing anti-dumping measures on the goods subject to review no longer applied. Please attach evidence to support your answer where possible.

Not applicable. TS Tubes has no captive use or captive sales.

Appendix reference:



SECTION E: Injury to your company

1. Is your company suffering injury? If so, please describe the nature and degree of the injury. This can relate to the prices, volumes or profits associated with your production and sale of the like goods, or to wider aspects of your business. Please specify and substantiate your claims with evidence. Please estimate the date when the injury began to affect your business. Explain how it has developed since this date.

TSUK has suffered injury from imports of the like goods stretching back many years. The low-priced, dumped imports from the countries under investigation have had a widespread corrosive effect on TSUK, contributing to the loss of market share and volume and the reduction of selling price and profit margins. The antidumping measures, which originally came into force in December 2008, have helped to restore and maintain fair competition, allowing an already difficult market to continue its recovery.

Appendix reference:

2. Please estimate the date when the injury began to affect your business. Explain how it has developed since this date. Would your company suffer injury if the existing anti-dumping measures on the goods subject to review no longer applied? If so, please describe the nature and degree of the injury. This can relate to the prices, volumes or profits associated with your production and sale of the like goods, or to wider aspects of your business. Please specify and substantiate your claims with evidence.

It is difficult to point to a specific date, but we consider that the injury dates back at least to 2004. The injurious effects caused by the low-priced imports of the product under review led to an antidumping complaint being filed by ESTA on behalf of EU producers (including TSUK). This complaint in turn led to the opening of an investigation by the EC and the subsequent imposition of antidumping measures in December 2008. These antidumping measures helped to restore and maintain fair competition, allowing an already difficult market to continue its recovery.

If the antidumping measures no longer applied, the countries in question have already shown their capacity to export at dumped prices, so the likelihood of a recurrence of injurious dumping is strong. There is an increased risk that distorted by unfair trade, uneconomic pricing decisions will be made by those seeking to dump material into the UK greatly reducing financial returns on the product in question, to a point where it may become unsustainable for TSUK Tubes who will be forced to further curtail production, close lines and reduce employment. UK end-user industries will lose



local, reliable sources of supply and become more reliant on distant, third country suppliers, who will be unable to offer the same level of service and technical support as a local UK supplier.

It should also be taken into account that in a context of global overcapacity, major markets like the USA, Canada, Brazil and some CIS countries have also imposed trade defense measures against steel pipes. Were the UK measures to be terminated, a trade diversion towards the UK market would be expected. For Tata Steel Tubes these extra volumes at dumped prices would have dramatic consequences on already low capacity utilisation rates and a difficult profit situation.

A further consequence of repealing existing import measures is that it will make the environment around which investment decisions are made far more risky than would otherwise be the case. This may result in the postponement or cancellation of investment plans that would otherwise improve the competitive position of the company, and the possible deferment of R&D expenditure in new or improved products, that would benefit both UK producers and end-users. This will have a number of adverse impacts: firstly, production may move offshore to lower-risk locations; secondly, UK consumers will lose the competitive benefits gained from technical advancements and will lose ground to third country competitors as a result; thirdly, if TSUK is unable to sustain investment in R&D this will result in the loss of well paid, highly skilled jobs, and a significant reduction in the knowledge economy so important to the longer-term competitive position of the UK.

Appendix reference:

3. Would your costs to make and sell change in the next five years if the existing anti-dumping measures on the goods subject to review no longer applied? Please describe the nature and degree of the change and provide supporting evidence. If possible, please provide annual cost of production estimates (e.g. projections or forecasts) for the next five years and use the text box below to explain the methods used to calculate these estimates.

TSUK Tubes Corby site does not solely manufacture the product concerned, and therefore the outcome of this review may have implications far beyond the product concerned. Due to the way in which fixed costs are allocated across all products manufactured on the site, were the returns from the product concerned to become unsustainable such that a reduction in activity arose, this may have a consequential impact on the cost of other products if the company were unable to make a proportional reduction in the total site fixed cost base.

It is not possible to prepare any meaningful estimate of our costs to make and sell over the next five years. There are simply too many variables and uncertainties. Most major cost elements are determined by external factors outside of our control, If that is not enough, the impact of Covid-19 and Brexit add even more layers of uncertainty.

Appendix reference:





4. Please complete **Annex 12 – Injury**. This should be completed in reference to your UK production of the like goods for the injury period. For the following injury factors listed in the annex, please explain in the text box below how you:
- calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods;
 - calculated and apportioned your finance costs (e.g. interest) incurred for the like goods;
 - assess your stock levels. Please indicate if your stock levels were abnormally high during the injury period. If so, please explain.
 - estimated your percentage of market share for the like goods;
 - set your wages, and the causes of any significant variations;
 - split the total number of your employees involved in the UK manufacture of like goods across different sites/locations; and
 - calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations.

Please refer to Annex 12. The data is derived from TSUK's reporting systems. Market share is based on an estimate for the UK market for the like goods.

Stocks during the POI are in line with normal expectations.

The financial returns have been calculated at an individual product level based on relevant manufacturing standards for specific process routes adjusted for the prevailing coil cost/grade and for non-standard performance.

Appendix reference:

5. Please explain whether any of the indicators listed in **Annex 12 – Injury** would be affected if the existing anti-dumping measures on the goods subject to review no longer applied. Please substantiate your claims with evidence. Where possible, please add additional rows in **Annex – 12 Injury** to provide estimates for the next five years (e.g. projections of forecasts). Please use the text box below to explain the methods used to calculate your estimates.

Please refer to E.2 above on the adverse impacts on TSUK if the existing antidumping measures no longer applied.

Information on specific injury indicators is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

As noted in E.3 above, there are too many variables and uncertainties to be able to prepare any meaningful estimates for the next five years.

Please refer also to the submission from UK Steel. This includes a detailed analysis for all three countries showing that dumping would occur if the existing measures



were removed. (Refer to sections: Belarus 3.4, Table 2; China 3.5, Table 4; Russia 3.6 Table 5). It also provides evidence that there is production capacity available to be exported from each of the three countries subject to this review that would dwarf the UK market (Section 4.12). Further, UK Steel's analysis indicates that prices from all three countries are significantly below UK domestic prices, which themselves are currently depressed due to pressure from other countries and difficult market conditions (Section 4.1.3 Table 8). This price undercutting analysis provides clear evidence that the UK would be an attractive market for these three countries. And with many countries having either trade remedy measures in place, or MFN tariffs, if the UK were to remove the existing measures it would become one of the few open markets globally. The clear conclusion that can be drawn is that if the existing measures were to be removed there would be a surge in low-priced imports from the countries concerned which would undercut domestic TSUK producer prices, causing the injurious effects noted above and elsewhere in this submission.

Appendix reference:

6. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure.

The level of profit we would expect to achieve in the absence of injury is commercially sensitive.

In the EU review investigation, the EU Commission applied a minimum profit level of 5%. While this sets a floor level, in our view the level of profit needs to be significantly higher than this to fully reflect the full costs of investments, R&D and innovation needed to meet ever more challenging environmental standards and maintain competitiveness.

Appendix reference:



7. Would your level of profit, before tax, as a percentage of turnover for the like goods be affected if the existing anti-dumping measures on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Please refer to E.2 above on the adverse impacts on TSUK if the existing antidumping measures no longer applied. The level of profit would decline if sales prices are forced down to uneconomic levels due to a surge in imports of low-priced imports from the countries concerned.

Please refer also to the submission from UK Steel which includes evidence that there is ample production capacity available to be exported to the UK from the three countries (Section 4.12). and that prices from all three countries are significantly below UK domestic prices and would significantly undercut sales from UK producers (Section 4.1.3 Table 8) leading to a fall in prices and the injurious impact on profits.

Appendix reference:

8. Explain if your current sales prices for your like goods are the same as your target sales prices. If not, please explain the reasons for this.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

9. Would your sales price for your like goods be affected if the existing anti-dumping measures on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Please refer to E.2 above on the adverse impacts on TSUK if the existing antidumping measures no longer applied. The sales price for like goods would decline due to a surge in imports of low-priced imports from the countries concerned.

Please refer also to the submission from UK Steel which includes evidence that there is ample production capacity available to be exported to the UK from the three countries (Section 4.12). and that prices from all three countries are significantly below UK domestic prices and would significantly undercut sales from UK producers (Section 4.1.3 Table 8).

Appendix reference:

10. Complete **Annex 13 – Investments**.

- Please include information relating to all company-wide investments, which includes investments that relate to the like goods, and investments that relate to like goods only.
- The last row should show aggregate investment totals per year.



- For each investment category, indicate the amount of investment (apportioned, where applicable) and explain what the investment is for.
- Where possible, add additional columns in **Annex – 13 Investments** to provide estimates (e.g. projections or forecasts) for the next five years assuming the measure is retained.
- For the investments you have made during the injury period, please also provide the depreciation incurred company wide and for the like goods.

Please provide details of your typical source(s) of finance (e.g. loans, debt, share issues, bond issues etc.) for each category of investment relating to your company-wide investments in the text box below.

[See Annex 13.](#)

Appendix reference:



11. Please complete **Annex 14 – Return on fixed assets related to the production of the like goods.**

- Indirectly related assets are used in the upstream process for the production of the like goods. For these assets, please explain in the text box below how you apportion the corresponding values to the production of the like good.
- If you are unable to provide information for indirectly related assets, explain the reasons for that. Please describe the effects this has on the level and trend of return.

See Annex 14.

Appendix reference:

12. Please describe any changes in your company's level and trends of returns on investment over the injury period. Please explain the nature and cause of these and substantiate with supporting evidence e.g. funding proposals, loan approvals or other relevant financial documents.

Please refer to Annex 13 and Annex 14.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

13. Use the text box below to explain what has affected your company's ability to make investments and to raise capital in the injury period. Please describe the nature and cause of this change and substantiate with supporting evidence e.g. funding proposals, loan approvals or other relevant financial documents.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

14. Please also explain whether your company's ability to make investments and ability to raise capital would be affected in the next five years if the existing anti-dumping measures on the goods subject to review no longer applied. Please substantiate your claims with evidence (e.g. company, investment plans, etc.) and if you have provided estimates explain how you calculated them.



This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

15. Please complete **Annex 15 – Cash flow** for the like goods.

- Ensure the depreciation you state for the POI in this annex matches the figure stated in Annex 5 – Cost to make and sell.
- The figures for inventory should relate to the numbers in the section on stocks in Annex 12 – Injury.

For the injury period, attach any cash flow calculation for the like goods you consider relevant and explain the methods used to calculate these figures.

See Annex 15

Appendix reference:

16. Explain any differences between your actual and forecasted budgets over the injury period, with reference to your cash flow statements.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

17. Would your actual and forecasted budgets be affected if the existing anti-dumping measures on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Appendix reference:

18. Please complete **Annex 16 – Forward sales contracts**. Comment on these forward sales contracts for like goods you listed in the annex – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation?



This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:



19. Would your forward sales contracts be affected if the existing anti-dumping measures on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.

Please refer also to E.2 above on the injurious impacts on TSUK if antidumping measures no longer applied.

Appendix reference:

20. If your company is suffering injury, please explain and indicate the degree to which this has been caused by the goods subject to review.

Please also explain and indicate the degree to which any other factors might have caused the injury, for example:

- volume and prices of imports not sold at dumped prices;
- contraction in demand or changes in patterns of consumption;
- restrictive trade practices of, and competition between, third country and UK producers;
- developments in technology; and
- export performance and the productivity of the UK industry.

Please substantiate your claim(s) with evidence.

The main cause of Injury has been the constant pressure of low-priced, dumped imports.

Appendix reference:

21. Would the cause(s) or degree of injury change if the existing anti-dumping measures on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Please refer to E.2 and E.20 above. The main cause of injury remains the constant pressure of low-priced, dumped imports. If the antidumping measures no longer applied, resulting in a surge in such imports then the degree of injury would increase.

Appendix reference:



22. Is your company under threat of injury? If so, please describe the threat, its cause and how the injury is clearly foreseen and imminent.

TSUK is under a clear threat of injury from a surge in low-priced imports of the like goods from the countries under review if the current measures were no longer applied. Removing the measures would leave the UK vulnerable to becoming a target for exports from the countries concerned, particularly so if the measures were continued in the EU. The countries concerned have significant capacity available and already export high volumes to other countries at low, dumped prices. These capacities could easily be diverted to exports for the UK should the measures no longer be applied. As such the threat is both clearly foreseen and imminent. Please also refer to the submission made by UK Steel.

Appendix reference:

23. Would there be any other effects on your industry and/or company if the existing anti-dumping measures on the goods subject to review no longer applied? Please substantiate your claims with evidence.

Please see comments above and the submission made by UK Steel.

Appendix reference:



SECTION F: Dumping

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the respective text box.

F1 Dumping

1. Do you have any information about the **normal value** of the like goods originating and sold in the Republic of Belarus, the People's Republic of China or the Russian Federation? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, or any other documentation relating to the normal value of these like goods.

Please refer to the submission from UK Steel

Appendix reference:

2. Do you have any information about the **export price** to the UK of the goods subject to review? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation relating to the export price to the UK of the goods subject to review.

Please refer to the submission from UK Steel

Appendix reference:



3. Please provide any additional information which you think could assist the assessment of the likelihood of occurring dumping; this could include for the goods subject to review and/or like goods:
- production capacity in the countries subject to review;
 - exports to third countries from the countries subject to review;
 - domestic consumption on the domestic market of the countries subject to review;
 - an estimate of the global supply and demand during the POI and forecasts for the next years; and/or
 - legislation and regulations, export restrictions and any other restrictions in the countries subject to review concerning raw material used for the production.

Please explain how you calculate your estimates and provide supporting evidence.

Please refer to the submission from UK Steel

Appendix reference:

F2 Constructed normal value adjustments

1. If you are aware of any factors that could mean significant costs or profits of the like goods produced in the Republic of Belarus, the People's Republic of China or the Russian Federation are unrepresentative because they do not reflect what these costs or profits would be if substantially determined by market forces, please provide details and any supporting evidence.

Please refer to the submission from UK Steel

Appendix reference:

F3 Particular market situation

1. Please describe the differences in the supply chain for all raw materials and other inputs required between your like goods and the goods subject to review. Please refer to different degrees of integration, if applicable.

Please refer to the submission from UK Steel

Appendix reference:



2. Are you aware of any market distortions in the Republic of Belarus, the People’s Republic of China or the Russian Federation affecting any of the raw materials or other inputs used for the production of the goods subject to review and like goods? Please describe such distortions in specific detail and provide evidence to substantiate your claims.

Please refer to the submission from UK Steel

Appendix reference:

3. Are the raw materials or other inputs affected by any distortions likely to represent a significant cost of production of the goods subject to review and like goods? If known, provide a detailed breakdown of the costs of production (including the HS subheadings – 6 or more digits) of the goods subject to review and like goods in the Republic of Belarus, the People’s Republic of China or the Russian Federation. Please, provide a specific, detailed response, supported by evidence.

Please refer to the submission from UK Steel

Appendix reference:

4. Please describe how any distortions on the relevant raw materials or other inputs affect their prices in the exporting country. Provide examples demonstrating how prices of the raw materials or other inputs are affected by the distortions in the exporting country during the POI. Please, provide a specific, detailed response, supported by evidence.

Please refer to the submission from UK Steel

Appendix reference:

5. Please list international markets which would be representative for any raw materials or other inputs affected by distortions. Provide prices of such raw material or other input in these markets for the POI. Please provide a specific, detailed explanation and support your claims with evidence.

Please refer to the submission from UK Steel

Appendix reference:



6. Please provide any additional information which you think could assist the assessment of market distortions; this could include:
- situations/distortions in the domestic market of the exporting country where prices are artificially low;
 - situations/distortions in the domestic market of the exporting country where there is significant barter trade;
 - situations/distortions in the domestic market of the exporting country where prices reflect non-commercial factors; or
 - any other reason, which could evidence that the comparable price cannot be used to determine the normal value of the goods subject to review.

Please be specific and detailed in your response, providing evidence to support your claims.

Please refer to the submission from UK Steel

Appendix reference:



SECTION G: Economic Interest Test

The economic interest test helps TRID assess the economic impact of a measure compared to what would happen if the existing anti-dumping amounts no longer applied.

TRID must consider the following six factors as part of the assessment:

- the injury caused to a UK industry by the dumping of the goods and the benefits to that UK industry in removing that injury;
- the economic significance of affected industries and consumers in the UK;
- the likely impact on affected industries and consumers in the UK;
- the likely impact on particular geographic areas, or particular groups, in the UK;
- the likely consequences for the competitive environment and for the structure of markets for these goods in the UK; and
- other matters that TRID consider relevant.

The questions in this section will contribute to this assessment. Please provide the information requested in this section where relevant and possible for your company.

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the corresponding text box.

1. Please provide the names, addresses and telephone numbers of all known domestic companies that produce the like goods and/or are involved in the importation, distribution or sale of the goods subject to review.

Contact details have been provided in a previous submission. We do not have such information on others who we assume will have registered as interested parties if the review is considered important to them.

Appendix reference:

2. Please provide an overview of the supply chain for your like goods, from raw materials through to final customers. Where possible, please describe the number, location and size of producers at each stage.

The main raw material for the like goods is hot rolled steel coil substrate. The like goods are produced at the Corby site. The like goods are used mainly by fabrication and installation companies in a number of different end-use applications, being mainly used in conveyance applications such as heating, ventilation, air conditioning and fire defence.



Appendix reference:

3. Please provide total annual employment figures in FTE (full-time equivalents) for the injury period for all your company's business activities relating to production of the like goods. Where possible, provide subtotals for each of your company's sites or facilities.

Please indicate how these employment figures would be affected if the existing anti-dumping measures no longer applied? Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for the next five years and explain the method used to calculate them.

Please refer to Annex 12 Tata Steel UK provides well paid skilled jobs in economically disadvantaged areas. These jobs would be put at risk if the existing antidumping measures no longer applied as TSUK would be at risk from a surge in low-priced imports of the like goods from the countries concerned. In addition to the risk to these direct jobs, there is a multiplier effect with each TSUK job supporting a number of other jobs, both in the supply chain and the wider local community e.g. shops, other local businesses etc. Each TSUK job is estimated to support at least 2 other jobs.

Appendix reference:

4. Please provide total annual median wage figures for all your company's sites involved in the production of the like goods during the injury period. If you are unable to provide median wages, please provide mean wages.

How would these wages be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please substantiate your claims with evidence. Where possible, please provide estimates for the next five years (e.g. projections or forecasts) and explain the assumptions made.

Please refer to Annex 12 Tata Steel UK provides well paid skilled jobs in economically disadvantaged areas. Average wages in Tata are well above the national wage levels, and are even higher locally. These wages and the jobs themselves would be put under pressure if the existing antidumping measures no longer applied as TSUK would be at risk from a surge in low-priced imports of like goods from the countries concerned.

Appendix reference:

5. Please state your domestic market share of the like goods and goods subject to review.

Indicate how this share would be affected if the existing anti-dumping measures were no longer applied? Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for the next five years and explain the method used to calculate them.



Please refer to Annex 3. This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:

6. Please comment on how significant production of the like goods is in relation to your company's entire UK production. Within your response, please state the share of total production value represented by the like goods during the POI.

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:

7. For the like goods and/or goods subject to review, please state (by value) the proportion of your total sales that is exported. Please provide these figures for the POI.

Reference Annex 10. This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary of the contents of this document without revealing sensitive information.

Appendix reference:

8. Please indicate who the consumers of the like goods are, which industry and level of trade they relate to and whether they are companies or private individuals. Are the like goods considered to be an intermediate and/or final good?

The like goods are used in a number of different end-use applications, being mainly used in conveyance applications such as heating, ventilation, air conditioning and fire defence. Some tubes are also used in construction applications like handrails and scaffolding. The users of the like goods are mainly fabrication and installation companies. The like goods are considered as intermediate goods.

Appendix reference:

9. Would any other industries, markets or products be affected if the existing anti-dumping measures on the goods subject to review no longer applied? These could include industry or markets for substitute or complementary products.

N/A

Appendix reference:



10. Please describe how you would expect the following to be affected if the existing anti-dumping measures on the goods subject to review no longer applied:

- market price of the like goods in the UK;
- total UK output of the like goods;
- total imports of the goods subject to review to the UK; and
- total exports from the UK.

Where possible, please provide estimates for the next five years (e.g. projections or forecasts) to support your claims.

If the existing antidumping measures no longer applied the following impacts could be expected

- market price of the like goods in the UK;
this could drop to uneconomic levels due to impact of a surge in low-priced imports from the countries concerned
- total UK output of the like goods;
would reduce if production was no longer economically viable due to increased low-priced imports
- total imports of the goods subject to review to the UK;
would increase due to the removal of measures
- total exports from the UK.
no impact

Appendix reference:



11. Do you know of any related industries that would be affected if the existing anti-dumping measures on the goods subject to review no longer applied? Please consider in particular:

- upstream industries – those who produce inputs needed for the like goods
- downstream industries – those who purchase the like goods or goods subject to review

• upstream industries – those who produce inputs needed for the like goods
 The upstream industry is composed of the producers of the main raw material, HR steel coil. The continuation of existing antidumping measures will help maintain fair market conditions for such upstream suppliers, helping to ensure that hot rolled coil sourcing by tube manufacturers remains within the UK with all the benefits to the UK economy this brings.

A decision to repeal existing antidumping measures is likely to increase the risk of uneconomically priced imports, thereby forcing tube producers to cut product costs in order to compete and survive in this market. Ultimately, the UK industry will be forced to further cut production and close lines which will have a clearly detrimental effect on upstream suppliers.

- downstream industries – those who purchase the like goods or goods subject to review

For stockists, distributors and other intermediaries, the continuation of antidumping measures would have little impact. Firstly, the antidumping measures are not intended to exclude imports from the market, but only to restore fair competition and ensure they are not sold at injuriously dumped prices. Secondly, other alternative sources exist: TSUK has under-utilised capacity, and other import sources will continue to be unaffected. Such intermediary parties have been dealing with these antidumping measures for the past 10 years with no ill-effects and without the market suffering any shortage whatsoever. Were the measures to be terminated, this would create disruption and uncertainty in the market, with the only beneficiaries likely to be opportunists out to make a 'quick-buck' without any regard to the longer-term consequences for the market.

Appendix reference:

12. Please describe any impacts on consumers you would expect if the existing anti-dumping measure on the goods subject to review no longer applied.

For end-users and consumers, the continuation of antidumping measures will help to ensure they have a long-term and reliable source of local supply. The measures in place have had very little impact on costs for end-user industries: the product concerned generally represents a very low proportion of the total cost of the applications it is used for. There is no evidence that the measures have resulted in any reduction in demand or impact on employment in these end-user industries. As noted above, there is also no risk to supplies from the continuation of measures as



sufficient capacity exists both in the UK and in other third countries. No significant positive effect would be generated by the termination of the measures as the capacity of the producers already on the market largely exceeds demand, furthermore any price reduction in the final products at consumer level would be negligible.

Appendix reference:

13. Please explain any effects on your plans for future investment or expansion in the UK if the existing anti-dumping measures no longer applied. Please state how this would affect different sites/locations of your company and support your claims with evidence (e.g. yearly investments plan, multi annual investment plans, abandoned or refused projects, etc.).

This information is by its nature commercially confidential and would harm TSUK's commercial interests if revealed to its competitors. It is not possible to provide a meaningful summary without revealing sensitive information.]

Appendix reference:

14. The Equality Act 2010 protects the characteristics listed below. Do you have any evidence to suggest any of these groups could be disproportionately affected if the existing anti-dumping measures no longer applied? Please provide evidence to support your answer.

- Age;
- disability;
- gender reassignment;
- marriage or civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

N/A

Appendix reference:

15. Please explain how the following factors regarding the competitive market environment and structure for the like goods and goods subject to review in the UK would be affected if the existing anti-dumping measures on the goods subject to review no longer applied:

- the range of suppliers of this type of goods in the UK,
- the ability of suppliers to compete in this market,
- the incentives of suppliers to compete vigorously,
- consumers' choices and available information.



Please provide evidence to support your answer.

If the antidumping measures are repealed, the countries in question have already shown their capacity to export at dumped prices, so the likelihood of a surge in low-priced imports and injurious dumping in the UK strong. This would have negative impacts as follows:-

- the range of suppliers of this type of goods in the UK.

This could reduce if TSUK was forced out of the market by a surge in low-priced imports.

- the ability of suppliers to compete in this market,

TSUK and other European suppliers would be forced to reduce prices to uneconomic and unsustainable levels in order to maintain sales against unfair dumped imports.

- the incentives of suppliers to compete vigorously,

The UK market for the like goods is already very competitive. If there is a surge in low-priced imports this is likely to push TSUK and other quality suppliers out of the market. Tata Steel Tubes past and present investments in productivity, quality and mindset of continuous improvement, give us confidence that, given a fair competitive environment, which the measures would help to maintain, we can maintain our current activity levels, helping to ensure that consumers continue to have a local, reliable and competitive source of supply.

- consumers' choices and available information.

Consumers already have a wide choice of suppliers including TSUK, other European producers and third country imports. Removing the antidumping measures could risk a reduction in consumer choice as TSUK and other quality suppliers could be priced out of the UK market, leaving consumers reliant on distant suppliers who will be unable to offer the same level of service and technical support as more local suppliers.

Appendix reference:

16. Please describe the nature and degree of any regional impacts that you would expect if the existing anti-dumping measures on the goods subject to review no longer applied.

If the antidumping measures no longer applied this would have a significant negative impact on Corby, where TSUK Tubes is one of the major employers.

Appendix reference:

17. If there are any additional economic factors that you consider to be relevant for the economic interest test in this review, please provide details here and any supporting evidence.



Please refer to the submission made by UK Steel

Appendix reference:



SECTION H: 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.

The questionnaire, spreadsheet annex and any appendices should be submitted through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **23 April 2020**. The checklist in [Section I](#) of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire and the spreadsheet annexes 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.

Company registration number: 0228000
Company name: Tata Steel UK Limited

[Personal data redacted]

18 September 2020

Date

Signature of authorised official

Due to Covid-19 restrictions it is not possible to physically stamp this submission.

I confirm that I have the authority to submit this application for and on behalf of Tata Steel UK Limited.

Company Stamp

[Personal data redacted]

Name and title of authorised official



SECTION I: Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please indicate if you have responded to all questions
Section A – Company structure and operations	Y
Section B – About your goods	Y
Section C – Costs and production	Y
Section D - Sales	Y
Section E – Injury to your company	Y
Section F – Dumping	Y
Section G – Supplementary questions	Y
Section H – Next steps and declaration	Y

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
A-2.5.1A	Articles of Association
A-2.5.2	TSUK Certificates of Incorporation
A-3.1.1	TSUK Organisation OPEN
A-3.1.2	Simplified Group Structure OPEN
A-6.5.1	TSUK to March 2017
A-6.5.2	TSUK to March 2018
A-6.5.3	TSUK to March 2019
A-6.11.1	TSE to March 2017
A-6.11.2	TSE to March 2018
A-6.11.3	TSE to March 2019
B-1.13	Product Literature
C-3.1	Production Process
C-3.4	Mass Tolerances

+Add additional rows as required