
NON-CONFIDENTIAL

APPLICATION FOR RECONSIDERATION

OF THE RECOMMENDATION TO THE SECRETARY OF STATE FOR
INTERNATIONAL TRADE

IN THE FRAMEWORK OF THE TRANSITION REVIEW OF ANTI-DUMPING
MEASURES APPLYING TO 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 (TD0001)

APPLICANT: TATA STEEL UK LTD.

9 AUGUST 2021

1 INTRODUCTION

1.1 Background information

On 14 May 2021, the Trade Remedies Authority (“TRA”)¹ issued the Statement of Essential Facts (SEF) in the framework of TD0001. In the SEF, the TRA preliminarily decided to revoke the application of the anti-dumping measures against Russia, including Severstal. In response, Tata Steel UK Ltd. (TSUK or the Applicant) submitted written comments with legal and factual arguments calling for an extension of the anti-dumping measures against Russia.² Moreover, the TRA also preliminarily concluded that CN code 7306 30 72 should be excluded from the measures since TSUK does not produce this product. On 3 August, TSUK sent a note to the TRA explaining that our company offers this product to our customers and that it is fully produced in the UK.³

Nevertheless, in its final recommendation (the “Recommendation”) to the Secretary of State for International Trade (SoS) dated from 9 July and published on 9 August, the TRA concluded that the measures should be revoked for imports of CN code 7306 30 72 for Belarus and China and for imports from Russia entirely.

On 9 August, the SoS accepted the Recommendation.⁴

1.2 Eligibility of the Applicant

The Applicant is the largest domestic producer of welded tubes and pipes (‘WTP’ or ‘the product concerned’). As such, TSUK is an ‘interested party’ for purposes of regulation 2 of the Trade Remedies (Reconsideration and Appeals) (EU Exit Regulations) 2019 (the “Reconsideration Regulations”). TSUK also registered as an interested party and duly cooperated with the TRA throughout the investigation. In particular, TSUK submitted a full questionnaire response, arranged a remote verification of the response and provided numerous additional explanations in response to TRA’s questions.

Further, the applicant is applying for reconsideration of an ‘original decision’ (under regulation 9 of the Reconsideration Regulations), namely the Recommendation which was made under regulation 100(1) of the Trade Remedies (Dumping and Subsidisation) EU Exit Regulations 2019 (the “Regulations”).

The Applicant is directly impacted by the TRA’s recommendation not to extend the measures on imports of CN code 7306 30 72 and on imports from Russia as this decision will lead to recurrence of dumped imports which will cause material injury to the domestic industry. This will inevitably have severe consequences for our company and thousands of our employees, not to mention an indirect effect on industries and communities supported by TSUK.

In view of this, TSUK is eligible to apply for reconsideration according to regulations 9 and 10 of Reconsideration Regulations.

¹ While the SEF was published by the Trade Remedies Investigations Department before the launch of the TRA on 1 June 2021, in this application we will refer to the TRA as the only investigating authority in the UK.

² Please refer to TSUK’s written comments on the SEF dated from 14 June 2021 (Annex 1).

³ Please refer to TSUK’s e-mail to the TRA dated from 3 August 2021 (Annex 2) (Confidential).

⁴ Trade Remedies Notice 2021/08 of 9 August 2021.

2 GROUNDS FOR APPEAL

2.1 CN code 7306 30 72 is produced in the UK

In the SEF, the TRA concluded that TSUK does not produce non threaded WTP plated or coated with zinc classified under CN code 7306 30 72 (TARIC code 7306 30 72 80). This conclusion is based on the fact that TSUK does not add zinc coating to WTP in-house. In view of this, the TRA recommended excluding this CN code from the product scope of the measures.

TSUK respectfully disagrees with the TRA's decision and submits that the products falling under this CN code pass both the Relevance to the UK Test carried out by the TRA pursuant to regulation 99A(2)(a)(ii) of the Regulations and the Economic Interest Test in accordance with regulation 100A(2)(a) of the Regulations. As explained to the TRA in an e-mail of 3 August 2021, TSUK does offer galvy tubes to its customers and have regular domestic sales of this product. Moreover, this product is fully produced in the UK. While TSUK used to add zinc coating to our WTP in-house, it is now outsourced to an independent supplier in the UK, namely [redacted]. [Non-confidential summary: TSUK carries out a major part of production whereas an independent supplier adds zinc coating to the product]. TSUK has been operating on this basis for almost 10 years since Tata Steel Europe closed its Hot Dip Galvanizing (HDG) bath in the Netherlands. TSUK provides a copy of its agreement with and invoices from [redacted] in Annex 3 [confidential], as well as several invoices for the sale of galvy tubes in Annex 4 [confidential].

In view of the above, it is clear that galvy tubes classified under CN code 7306 30 72 remain highly relevant to the UK. Moreover, it is in the economic interest of the UK to maintain the measures on this product for several reasons. First, galvy tubes play an important role in TSUK's offering and provide our customers with a one-stop-shop for a wide range of tubular products. Second, as TSUK outsources galvanizing to an independent UK supplier, it provides economic benefit to domestic SMEs who would lose a share of their business if TSUK reduced or stopped its production of galvy tubes under the pressure from low-priced imports. While there is no evidence that revocation of the measures will be in the wider economic interest in the UK, it will certainly have severe negative consequences for TSUK, its employees and independent UK suppliers of zinc coating, as explained in detail below.

- 1) Although TSUK sells approximately [Non-confidential summary: relatively low volumes] of galvy tubes per year, it is a high-margin product that contributes substantially to our profitability. Moreover, domestic demand for this product is growing and we expect a significant increase in domestic sales due to large infrastructure projects that will require this specific type of tubes (for instance, there are numerous tunnels projects that are already confirmed for the next 10 years). Importantly, our production capacity is sufficient to produce a larger volume of galvy tubes in line with an increasing domestic demand.
- 2) Galvy tubes can be used in a number of applications, some of which overlap with other, cheaper tubes. Therefore, if imports of galvy tubes from the countries concerned are low-priced enough, they will enter into competition with TSUK's non-galvy tubes that can be used in the same applications. For instance, galvy tubes can replace certain other tubes in the construction sector.
- 3) Producers in the countries concerned will be able to circumvent the measures applicable to other CN codes by simply adding zinc coating to their WTP. This would undermine the effect of the measures on all imports from the countries concerned.
- 4) Since galvy tubes would sit at the top of the welded tubes price list and are a part of our conveyance offering, our UK customers will be incentivised to switch to

another supplier for a range of products if the most expensive one (that is galvy tubes) is available for a lower price.

The above-described factors will negatively affect our sales estimated at the level of at least [7kt-15kt] per year. In terms of our production facilities, it will have a severe negative impact on both Corby and Hartlepool.

TSUK also notes that revocation of the measures on imports of galvy tubes will also directly affect UK zinc coating suppliers. Indeed, if TSUK becomes unable to compete with low-priced imports of galvy tubes, we will produce and outsource lower, if any, volumes of WTP that require galvanizing. In addition, similarly to TSUK, zinc coating suppliers will not be able to benefit from favourable market conditions and the growing demand for galvy tubes if the measures for CN code 7306 30 72 are revoked. It must be also noted that UK zinc coating suppliers, including our supplier [redacted], strictly follow UK environmental rules and ensure that the UK has a stable supply of environmentally sustainable goods. While meeting the high environmental production standards requires significant investments and results in higher costs, the UK steel industry operates in an environmentally sustainable manner, which is clearly in the wider interest of the UK. At the same time, production of galvy tubes in the countries concerned may not be subject to the same environmental rules and standards.

Finally, TSUK notes that all key findings of the TRA are based on the full product scope of the measures, including CN code 7306 30 72. Moreover, as explained above, nothing in TRA's analysis seems to suggest that revocation of the measures for this specific CN code would be in the economic interest of the UK. Therefore, all legal requirements for maintaining the measures on this CN code are met.

In light of the foregoing, TSUK respectfully requests the TRA to maintain CN code 7306 30 72 (TARIC code 7306 30 72 80) in the scope of the anti-dumping measures.

2.2 If the anti-dumping amount is 'sufficient' to offset dumping, then the TRA need not (and should not) consider whether that measure is 'necessary' to offset dumping and can proceed straight to its assessment of injury

The legal test, in a transition review, to assess whether dumping has occurred is contained in Regulation 99A(1)(a)(i) of the Dumping Regulations which states: "*In a transition review, the TRA must consider whether the application of the anti-dumping amount... is necessary or sufficient to offset the dumping of the relevant goods.*"

A measure that is 'sufficient' to offset dumping is one that eliminates (or nearly eliminates) dumping. A measure is 'necessary' to offset dumping if it is a prerequisite to eliminate (or nearly eliminate dumping), but may, on its own, not [be sufficient] do so (as it requires additional measures such as a higher duty rate). It is of critical importance to note the guidance states unequivocally that an assessment of whether dumping is likely to re-occur if the measure were removed **forms part of this 'necessity' test** (i.e. whether the measure is a prerequisite to eliminate or nearly eliminate dumping). We cite the relevant provision in the guidance:

Determination as to whether a measure is needed to counteract dumping

*According to regulation 99A(1)(a)(i) of the dumping and subsidisation regulations, TRID must consider whether the continuing application of an anti-dumping measure is necessary or sufficient to offset the dumping. **TRID will assess if the application of the existing measure is necessary to offset dumping and prevent any future dumping should the measure be terminated.***

A range of evidence relating to exporters, exporters' home and third markets, and the domestic market, is likely to be relevant to this assessment.

When assessing whether the measure is necessary to counteract dumping, TRID can decide to make the assessment on either an exporter by exporter or on a countrywide basis.

The factors that may be considered include:

Continued dumping

...

Production capacity

Substantial spare capacity, or plans to increase capacity, among overseas **exporters may indicate that they would be able to continue or resume dumping if measures were removed**

Inventories

High inventory levels of oversea exporters may indicate that **exporters would be able to continue or resume dumping if measures were removed.**

Production levels

High production levels of overseas exporters may indicate that **exporters would be able to continue or resume dumping if measures were removed.**

...

Other factors

Any other factors that may be relevant in determining the likelihood that dumping will continue or occur if measures were removed.

If the outcome of this assessment is that continuing application of a measure is not necessary to offset the dumping (i.e. that it is not likely that dumping would continue or occur if measures were removed), then TRID should make a preliminary decision that measures should be revoked. (emphasis to be added)⁵

Under Regulation 99A(1)(a)(i) of the Dumping Regulations, the TRA ‘*must*’ only consider whether the application of the anti-dumping amount is “*necessary or sufficient*” (emphasis added) to offset dumping, not whether the anti-dumping amount is necessary **and** sufficient.

In other words, under regulation 99A(1), if the TRA can demonstrate that the anti-dumping amount was ‘sufficient’ to offset dumping, then it must move on to assess injury (and is not required to assess formally necessity). Conversely, if the TRA can establish that the measure was ‘necessary’ to offset dumping (which includes an assessment of the likelihood of the recurrence of dumping) then the TRA must move on to examine injury (and is not required formally to assess sufficiency).

This interpretation flows from the most natural and logical reading regulation 99A(1)(a)(i) of the Dumping Regulations. The regulation explicitly states that the TRA ‘*must*’ consider whether the measure was ‘*necessary or sufficient*’ to offset dumping. This is a lower threshold than necessary and sufficient. It explicitly gives the TRA a choice as to how fulfil the condition contained in regulation 99A(1)(a)(i). The TRA ‘*must*’ establish that the dumping amount was ‘*sufficient*’ to offset dumping ‘**or**’ it ‘*must*’ establish the dumping amount was ‘*necessary*’ to offset the dumping amount, but **not both**. If either route is established, then the TRA must move on to consider injury.

⁵ Department for International Trade, Guidance, <https://www.gov.uk/guidance/trade-remedies-investigations-directorate-trid-dumping-and-subsidisation-investigations-guidance/transition-reviews-anti-dumping-and-countervailing-measures>.

There is an important reason why Parliament provided two routes to establish dumping under a transition review: the sufficiency route or the necessity route. This is because the dumping amount may have eliminated all (or nearly all) imports into the UK from the parties under investigation. As such, given the absence of data, it may prove difficult to establish the necessity of the measure (by, for example, calculating a dumping margin or, even, assessing the likelihood that dumping would re-occur if the measure were removed, an exercise fraught with uncertainty). But, in such circumstances, it is not difficult to prove the measure is sufficient to offset dumping as the elimination or near elimination of imports demonstrates, in and of itself, that the measure is in fact 'sufficient' for such purposes. Indeed, a low level or no imports establishes that the measure was sufficient and had the intended effect of eliminating all (or nearly all) dumped imports. Consequently, the TRA can move onto its injury assessment having established the 'sufficiency' of the measure.

In these circumstances, once the sufficiency of the measure is established as long as injury is demonstrated and the economic interest test is satisfied, then the TRA must maintain the measure in its current form up to a maximum of five years (given the absence of reliable data on how the measure could be adjusted). It does not need to consider the 'necessity' of the measure which, as the guidance states, includes assessing the likelihood that dumping would re-occur if the measures were removed (whether this be done under regulation 70(6)(a) or otherwise).

The TRA, in the Recommendation, examined whether the measure was sufficient to offset dumping **and** whether it was necessary (by examining the likelihood that removal of the measure would lead to future dumping) thereby imposing a higher threshold than that required by regulation 99A(1)(a)(i).⁶ With respect, this position is wrong in law.

Having established the measure was sufficient to offset dumping for Russia⁷ and Severstal⁸, the TRA was compelled by the Regulation to examine injury (and need not, indeed should not, have examined the necessity of the measure through the likelihood test). Given that the TRA is satisfied that injury exists and the economic interest is satisfied, the TRA, as a matter of law, has established all the requisite elements to maintain the measures against Russia and Severstal in its current form up to a maximum of five years (given the absence of reliable data on how the measure could be adjusted). Any other outcome is an error of law and contrary to the clear meaning of the Regulation.

2.3 Russia must remain subject to the anti-dumping measures due to high likelihood of recurrence of dumping

Even if the TRA rejects the legal test in regulation 99A(1) as set forth above, and believes that the necessity of the measure and/or likelihood of dumping re-occurring should also be examined (which Tata strongly contends is wrong in law), it nevertheless remains that the measures are also necessary to offset dumping and/or prevent the likelihood of future dumping. At the outset, TSUK notes that it provided detailed comments in response to the SEF in which we explained why Russia must remain subject to the measures.⁹ Most of our arguments contained in that submission remain valid as they were either ignored by the TRA in the Recommendation or were not given proper consideration. Moreover, some of TRA's key final conclusions with respect to Russia contradict the actual data and go contrary to the settled WTO case law. TSUK will address these issues in much detail below.

⁶ Recommendation, para 7.136.

⁷ Recommendation, para 7.133.

⁸ Recommendation, para 7.222.

⁹ Recommendation, para 2.31.

2.3.1 TRA's analysis of likelihood of dumping with respect to Russia is flawed and contradicts WTO case law

The TRA recommended excluding Russia from the scope of the measures because they considered it *"unlikely, on the balance of probabilities, that dumping from Russia, including Severstal, would occur if the anti-dumping amount were no longer applied"*.¹⁰ In order to reach this conclusion, the TRA analysed a wide range of factors and comments provided by TSUK, Severstal and Russia's Ministry of Economic Development and Ministry of Industry and Trade ('the Ministries'). In addition, the TRA had access to the data relevant for the likelihood of dumping assessment which was provided by Severstal and the Ministries. While the objective and verifiable data clearly indicated that Russian producers, including Severstal, have a significant incentive to export WTP to the UK at dumped prices, the TRA decided to base its decision on assumptions and unverifiable or even likely false claims of Severstal and the Ministries.

TSUK is very surprised by the TRA's approach to such unverifiable and uncertain evidence, as it clearly goes contrary to the provisions of Article 47.2(a) of the Regulations and Articles 6, 11.3 and 11.4 of the WTO Anti-Dumping Agreement and corresponding jurisprudence concerning the evidence on which the decision is based.

The requirement to base any decision in a review procedure on positive evidence is confirmed and explained in detail by WTO Panels and the Appellate Body. In particular, the Panel in *Pakistan – BOPP Film (UAE)* set out its interpretation of Article 11.3 as preventing a Member from relying solely on assumption or speculation when conducting a likelihood analysis in a review proceeding:

*"Together, these terms indicate that a Member may not rely solely on assumption or speculation when conducting a likelihood analysis during a sunset proceeding but must, instead, conduct its examination on the basis of positive evidence so as to arrive at a reasoned determination, resting on a sufficient factual basis, that dumping and injury are 'likely' – i.e. probable and not merely possible – to continue or recur."*¹¹ (emphasis added)

Moreover, the Panel in *US – DRAMS* emphasised the importance of positive evidence while determining whether the measure must remain in place:

*"We note that the necessity of the measure is a function of certain objective conditions being in place, i.e. whether circumstances require continued imposition of the anti-dumping duty. That being so, such continued imposition must, in our view, be essentially dependent on, and therefore assignable to, a foundation of positive evidence that circumstances demand it. In other words, the need for the continued imposition of the duty must be demonstrable on the basis of the evidence adduced."*¹² (emphasis added)

As TSUK will demonstrate in sub-sections below, the TRA acted inconsistently with the above-described requirement as its analysis of likelihood of dumping recurring is based on presumptions (often not supported by any verifiable evidence) rather than on positive evidence. In this respect, we draw TRA's attention to the conclusions reached by the Appellate Body in *US - Corrosion-Resistant Steel Sunset Review*. First, the Appellate Body established that the use of presumptions may be inconsistent with an obligation to make a particular determination in each case using positive evidence. Moreover, it considered *"that a firm evidentiary foundation is required in each case for a proper determination under Article 11.3 of the likelihood of continuation or recurrence of*

¹⁰ Please refer to Annex 1.

¹¹ WTO Panel Report, *Pakistan – BOPP Film (UAE)*, para. 7.543

¹² WTO Panel Report, *US – DRAMS*, para. 6.42.

dumping. Such a determination cannot be based solely on the mechanistic application of presumptions."¹³

Naturally, as the TRA had to determine whether dumping is likely to recur, rather than whether it exists or existed, it could carry out a prospective analysis which would inherently contain certain presumptions. However, even in this case, TRA's prospective analysis must have had a factual foundation relating to the past and, where possible, the present. In contrast, TRA's conclusions were to a large extent based on unverifiable (if not false) presumptions about future developments that mostly contradicted positive evidence (i.e. the actual verifiable data available for the previous years). As a result, the TRA arrived at conclusions that are not based on facts and, therefore, are not objective determinations. In this respect, the Panel in *US – Corrosion-Resistant Steel Sunset Review* emphasized that even investigating authority's prospective analysis must be based on objective determinations:

"Future 'facts' do not exist. The only type of facts that exist and that may be established with certainty and precision relate to the past and, to the extent they may be accurately recorded and evaluated, to the present. We recall that one of the fundamental goals of the Anti-Dumping Agreement as a whole is to ensure that objective determinations are made, based, to the extent possible, on facts. Thus, to the extent that it will rest upon a factual foundation, the prospective likelihood determination will inevitably rest on a factual foundation relating to the past and present. The investigating authority must evaluate this factual foundation and come to a reasoned conclusion about likely future developments."¹⁴ (emphasis added)

In view of the above-mentioned requirements, it is clear that the TRA did not meet the standards of an objective determination as they based their conclusions on presumptions and not on positive evidence. Moreover, as will be shown by TSUK in more detail below, positive evidence in the present case clearly suggests that recurrence of dumping by Russian producers is likely. In this respect, the TRA itself admits that "*some factors do suggest that Russian producers of WTP could dump to the UK in the future*".¹⁵ The TRA also acknowledges that certain developments and factors applicable to Russian producers generally increase the likelihood of dumping and may do so in case of Russian producers specifically (e.g., excessive spare capacity). In view of this, TSUK wishes to draw the TRA's attention to the fact that the investigating authority does not have to be absolutely certain that dumping will reoccur in order to extend the measures. In fact, no such certainty can be achieved because, as explained above, future facts simply do not exist. Instead, an investigating authority must establish whether the dumping would be probable in the absence of anti-dumping duties. This is confirmed by the Panel in *US – DRAMS*:

We also note that 'likelihood' or 'likely' carries with it the ordinary meaning of 'probable'. That being so, it seems to us that a 'likely standard' amounts to the view that where recurrence of dumping is found to be probable as a consequence of revocation of an anti-dumping duty, this probability would constitute a proper basis for entitlement to maintain that anti-dumping duty in force. Without prejudice to the legal status of such a view in terms of its consistency with the terms of Article 11.2 - a matter on which we are not required to rule as noted in the text above - we feel obliged to at least take note that, at least as a practical matter, rejection of such a view would effectively amount to a systematic requirement that reviewing authorities are obliged to revoke anti-

¹³ WTO Appellate Body Report, *US – Corrosion-Resistant Steel Sunset Review*, para. 178.

¹⁴ WTO Panel Report, *US – Corrosion-Resistant Steel Sunset Review*, para. 7.279.

¹⁵ Recommendation, para 7.218 (for Russia in general) and para. 7.274 (for Severstal).

*dumping duties precisely where doing so would render recurrence of dumping probable.*¹⁶

In the sub-sections below, TSUK will explain in detail why the above-mentioned legal provisions and jurisprudence clearly suggest that the anti-dumping measures against Russia must be extended.

2.3.2 Positive evidence suggests a high likelihood of reoccurrence of dumping by Russian producers

In TSUK's opinion, the TRA manifestly ignored the above-mentioned legal provisions and requirements of WTO case law with respect to the evidentiary basis of their decision. Indeed, the TRA's recommendation is largely based on assumptions and unverifiable information provided by the Ministries or Russian producers and not on positive evidence. Moreover, such positive evidence, in fact, indicates a high likelihood of reoccurrence of dumping by Russia producers. It must be also noted that in its analysis, the TRA occasionally refers to the data available from non-cooperating Russian producers. TSUK notes that public reports of non-cooperating producers in isolation cannot constitute a reliable source of information as such data is by default unverifiable and certainly not objective. In view of this, we submit that the conclusions of the TRA with respect to likelihood of dumping by Russian producers reoccurring must be reconsidered in the light of the above-mentioned legal provisions and requirements of WTO case law.

a) Lack of cooperation from Russian producers

TSUK notes that there are at least 5 large producers of WTP in Russia.¹⁷ At the same time, only one producer, Severstal, cooperated with the review. In TSUK's opinion, this fact alone raises serious doubts concerning the decision to revoke the measures against Russia as a whole.

Since all Russian producers, except for Severstal, failed to cooperate with the review, the TRA had to base its decision on information available from secondary sources pursuant to Article 47(5) of the Regulations. TSUK acknowledges that the Ministries tried to the extent of their abilities to provide the TRA with information about the Russian WTP market. Pursuant to Article 47.2(a), the TRA must have regard to information supplied by an interested party only provided the information is verifiable. In this respect, TSUK notes the following. First, limited input from the Ministries in any case does not provide nearly the same level of detail as the TRA would have been able to obtain from at least several cooperating producers. Second, as will be explained in detail below, the key arguments of the Ministries are unverifiable and, therefore, do not meet the requirement established by Article 47.2(a). Moreover, such arguments seem to be based on mere assumptions and, in fact, proved to be false previously. It must be also noted that the Ministries have a direct interest in the outcome of this case as they support the Russian steel industry. Therefore, any information provided by the Ministries must be treated with caution and cannot be considered by the TRA in isolation. TSUK will demonstrate below how the TRA interpreted conflicting evidence or lack of evidence in favour of Russian non-cooperating producers.

¹⁶ WTO Panel Report, *US – DRAMS*, para. 6.48 (footnote 494).

¹⁷ The most notable WTP producers in Russia are Seversky Pipe Plant Open Joint Stock Company (TMK Group), Joint Stock Company Taganrog Metallurgical Works (TMK Group), Open Joint Stock Company Vyksa Steel Works (OMK Group), Joint Stock Company Almetjevsk Pipe Plant (OMK Group) and Severstal. There are likely other smaller producers of the product concerned of which TSUK is not aware.

- b) The factors the TRA considered indicated dumping was likely to occur were based on ‘positive evidence’, unlike those that suggested (incorrectly) that dumping would not re-occur.

With respect to Russia, the TRA has already conceded that certain factors raised the probability of dumping. First, there were ‘significant level of unused capacity’ in Russia. Second, domestic consumption of the like goods declined from 2018 to the POI. Third, Russian producers could produce to the UK’s technical; specifications allowing them entry.¹⁸

The TRA has also made a similar correct concession with respect to Severstal – certain factors raised the probability dumping would re-occur were the measures lifted. First, there were ‘significant level of unused capacity’. Second, domestic consumption of the like goods declined from 2018 to the POI. Third, Severstal could produce to the UK’s technical; specifications allowing them entry. Last, Severstal experienced declining profits from the domestic sale of like goods during this period.¹⁹

In line with WTO case law, these are factors based on ‘positive evidence’ – historic and/or present data which is verifiable (things one can say positively and with confidence are true and did happen). They gave the TRA a robust ground to conclude dumping was likely to re-occur should the measure be revoked.

However, the factors which the TRA used to overturn this conclusion, and find that dumping was unlikely to re-occur, are not based on positive evidence. They are, it is respectfully submitted, instead based on conjecture, shaky assumption, unevicenced assertion and/or unverifiable information.

These factors are: that domestic consumption would go up due to infrastructure spending, the limited level of stock, and that the Russian landing price was competitive. Let us take each in turn.

- c) Domestic consumption in Russia is decreasing with no evidence of a possible recovery

TSUK notes that TRA’s analysis of and conclusion on domestic consumption of WTP in Russia were based solely on assumptions that go contrary to the factual evidence available to the TRA.

It must be noted that the TRA attributed particular importance to the developments in Russia’s domestic consumption for the purpose of its dumping likelihood assessment. Indeed, TRA’s conclusion on consumption played a key role in its finding that dumping from Russia is unlikely to reoccur:

“However, there is greater evidence that Russian producers of WTP have limited incentive to dump.

We do not think that the decline in domestic production or consumption is likely to continue. The Russian government has plans to invest into large-scale infrastructure projects and pursue modernisation plans.”²⁰

The TRA seems to have based its decision on two main assumptions: 1) domestic consumption saw only a ‘marginal’ decrease in 2019; 2) domestic consumption is likely to recover and absorb spare production capacity. TSUK strongly disagrees with both assumptions as they contradict the actual data and are not supported by any meaningful evidence.

¹⁸ Recommendation, para 7.213.

¹⁹ Recommendation, para 7.269.

²⁰ Recommendation, para 7.218 (for Russia in general) and paras. 7.214-7.215.

First, the TRA appears to rely exclusively on the data provided by the Ministries without even trying to verify or reconcile it. This is apparent from the TRA's conclusion that "*the fall is approximately a quarter of the increases in Russian domestic consumption of WTP from 2015-2017*". This approximation is only valid based on the consumption data submitted by the Ministries:

Table 2. Consumption of WTP in Russia according to the Ministries and the TRA

	2015	2016	2017	2018	2019
Consumption, Kt	3,483	3,654	3,837	3,843	3,749
Change, Kt			+354		-94 (26%) ²¹

According to their submission, the Ministries extracted the above figures from Metal Expert. While Metal Expert is a reliable independent source of information, it is unclear to TSUK how the Ministries aggregated the data and whether the TRA reconciled it. It is our understanding that the Ministries based their calculations on the same Metal Expert data that has been submitted to the TRA by UK Steel (available only for the period from 2017 to 2019):

Table 2. Consumption of WTP

	2015	2016	2017	2018	2019
Data submitted by the Ministries, kt					
Shaped tubes	2,245	2,339	2,527	2,482	2,456
Water & gas pipes	340	310	328	304	244
General purpose tubes	898	945	983	1,057	1,049
Total consumption	3,483	3,654	3,837	3,843	3,749
Data available from the UK Steel's Metal Expert report, kt					
Hollow structural sections	-	-	2,527	2,482	2,460
Water & gas pipes	-	-	328	304	244
Standard pipes	-	-	2,300	2,374	2,328
Total consumption	-	-	5,155	5,159	5,032

Source: Metal Expert. For the 2019 data, TSUK only had the data for 11 months (January – November), thus the figures in the table are annualized.

While UK Steel's data only covers the period from 2017 to 2019, it is clear that two out three categories used by the Ministries in their calculations match perfectly, yet the third product category ('general purpose tubes') does not match the Metal Expert data. TSUK tried to reconcile the data by using other product categories available in Metal Expert but was not able to arrive at the figures reported by the Ministries.

The TRA also had regard to other sources of the consumption data. For instance, the TRA referred to the following evidence submitted by UK Steel and other secondary sources:

- Annual report of TMK showing a decrease in domestic consumption of 22% in 2019;

²¹ Consumption decreased by 26% or 94 Kt (or a quarter as stated by the TRA) as compared to the increase of 394 Kt in the period of 2015-2017.

- MMK's operating financial data showing a decline in sales of 9.5% in 2019 which confirms the above-mentioned trend;
- The Metal Expert data that allegedly shows an increase in domestic demand of almost 20% in 2019 with a further decline by 20% in 2020.

TSUK notes that the figures reported by Russian individual producers confirm the general downward trend at a larger scale than Metal Expert. However, we do not understand the TRA's reference to a 20% increase in domestic consumption based on the Metal Expert data submitted by UK Steel. As stated above, it is our understanding that UK Steel submitted the same Metal Expert data as the Ministries. Moreover, having reviewed the Metal Expert excel file submitted by UK Steel, we did not find any product category showing an increase of 20% in 2019.

While the TRA's analysis of the actual data raises well-founded concerns, the prospective analysis of domestic consumption in Russia and its impact on capacity utilisation is truly striking. In particular, the TRA reached the following conclusions:

*"The most recent information available indicates that Russia will shortly begin large scale spending on domestic infrastructure projects and specific plans are currently being identified. We have determined that these plans are sufficiently well developed and will be likely to have a greater relative impact on Russian domestic consumption than the Chinese 5 year plans, which are described as "guiding plans".*²²

*"Whilst, on balance, we conclude that consumption of WTP in Russia has fallen between 2018 and 2019, we do not see this as likely to be a long-term trend. The fall is approximately a quarter of the increases in Russian domestic consumption of WTP from 2015-2017. We have assessed it as likely that domestic consumption will recover.*²³

*"The Russian government have also stated that they plan to invest into large-scale infrastructure projects and pursue modernisation plan to revamp the country's highways, regional airports, railways, seaports, and other transport infrastructure within the short to near term future. This would be likely to increase the domestic consumption of WTP, and decrease excess capacity, therefore decreasing the overall likelihood that dumping would occur were the measures to no longer apply.*²⁴

In TSUK's view, the above-quoted conclusions are fundamentally flawed as they are based on mere assumptions of the TRA, which are derived from unverifiable statements of a cooperating party with a direct interest in the outcome of the case. Moreover, such conclusions contradict the positive evidence (that is the actual data) available to the TRA from independent sources.

First, TSUK wishes to emphasize that the statements of the Ministries concerning an alleged future increase in domestic consumption are significantly less relevant and important to the present case than the TRA seems to believe. Indeed, the Ministries did not provide any evidence even remotely suggesting that the hypothetical infrastructure projects would bring any benefit to Russian producers of WTP and reduce their incentive to export at dumped prices to the UK. In order to reach such a conclusion, the following conditions must be cumulatively met:

- Large infrastructure projects actually materialize in the very near future;
- Such projects require very significant volumes of WTP;

²² Recommendation, para 7.218 (for Russia in general) and para. 7.183.

²³ Recommendation, para 7.218 (for Russia in general) and para. 7.184.

²⁴ Recommendation, para 7.218 (for Russia in general) and para. 7.181.

- Russian producers win tenders and receive a substantial part of volumes required for the projects;
- Russian producers maintain their export sales to other third countries and do not further increase their production capacity.

As TSUK pointed out in our comments on the SEF, the TRA was not able to obtain any reasonable evidence on the first three points. In fact, the TRA only referred to four articles in media as a proof of the infrastructure plans being sufficiently well developed with a likely significant impact on Russian domestic consumption. In this respect, TSUK notes that we would have expected the TRA to obtain more comprehensive evidence from the Ministries if the infrastructure plans are as well developed and reliable as the TRA seems to believe. At the very least, the TRA could have requested the Ministries to provide any formal documentation in support of their claims, outlining the timeframe of and key inputs required for a specific project. It is TSUK's understanding that no such documents were provided by the Ministries or requested by the TRA. Furthermore, the Ministries failed to submit any evidence of Russian producers of WTP securing significant volumes to be supplied for the infrastructure projects. If the infrastructure projects are well developed and will materialise in the near future, the Ministries must be able to submit some evidence confirming that Russian producers will substantially benefit from such projects (e.g., tender announcements or at least correspondence with the producers on price and volume negotiations). Yet, no such evidence was presented to the TRA. Therefore, the TRA did not have any positive evidence suggesting that the above-mentioned conditions will be met.

Moreover, TSUK draws the TRA's attention to the fact that the Russian government regularly announces 'large-scale infrastructure projects' and 'modernisation plans' but very few of them, if any, ever materialise. In our comments on the SEF, TSUK pointed out that such projects also frequently get delayed or cancelled and supported this argument with a reference to a reputable independent source.

One of the four articles that the TRA cites as evidence of the likelihood of infrastructure projects is an article from the Moscow Times dated April 2019²⁵ (almost three years old). However, in keeping with previous grand Russian infrastructure plans, every project cited by that article has been delayed with no evidence that any of them are likely to materialise (let alone soak up the spare capacity in the Russian WTP market). The most notable example is the Moscow – Nizhny Novgorod, or Moscow – St. Petersburg high-speed railway mentioned in the article by The Moscow Times. In March 2019, Prime Minister Dmitry Medvedev formally signed off on a project for a high-speed railway to transport passengers from the Russian capital to Nizhny Novgorod. One month later, what seemed like a definitive plan was changed by President Vladimir Putin to a high-speed railway from Moscow to St. Petersburg (RUB 1.5 trillion). The project was widely supported by the governor of St. Petersburg, CEO of Russian Railways and the Ministry of Economic Development. In September 2020, Vice Minister of Transport announced that the project will commence in 2021.²⁶ Yet, in August 2021, Vice Prime Minister Marat Khusnullin announced that in the next year, i.e. 2022, the Russian government will decide whether to implement the project or not (without mentioning when the works would actually start). Moreover, the decision will be made "depending on the condition of the Russian National Wealth Fund".²⁷ Therefore, implementation of the project that has been already approved

²⁵ Recommendation, footnote 62, see also: <https://www.themoscowtimes.com/2019/04/03/russias-infrastructure-overhaul-explained-a64839>

²⁶ RZD-Partner (<https://www.rzd-partner.ru/zhd-transport/news/stroitelstvo-vsm-moskva-sankt-peterburg-nachnetsya-v-2021-godu/>). English translation is available in Annex 5.

²⁷ Russian Gazette (<https://rg.ru/2021/08/29/kogda-primut-resheniia-po-postrojke-skorostnyh-zheleznyh-dorog.html>). English translation is available in Annex 6.

by both Prime Minister and President has been delayed by more than 3 years so far with no evidence that it will commence in the coming years.

Apart from the above-mentioned projects that have not materialised, TSUK notes that another large yet not recent project mentioned in the article quoted by the TRA is the Dzhugba – Sochi motorway. Initially, it was planned to commence the project in the summer of 2019. However, in June 2021, CEO of the State Enterprise “Avtodor” stated that the works are unlikely to begin at least until 2024 due to very high costs (approximately RUB 1.5 trillion).²⁸ The Moscow Times’ article also mentions another project, the Bovanenkovo – Sabetta railway (RUB 77 billion). However, this project should not be considered by the TRA, as the article itself directly states that it is not even included into the government infrastructure plan. Moreover, in 2019, the government of the Yamalo-Nenets Autonomous District terminated its contract on the construction of the Bovanenkovo – Sabetta railway with the only contractor.²⁹ TSUK did not find any recent news about the project at all, let alone about it being implemented. The same article also mentions a modernisation plan of the Pevek airport. Although it can hardly be considered a large-scale infrastructure project with its estimated value of RUB 3.6 billion, even this project has been postponed multiple times in 2020 and 2021.³⁰ As of September 2021, there are no reports confirming that the project will materialise. Finally, the last and the cheapest project mentioned in The Moscow Times’ article is the cargo turnover increase in the Beringvosky port (RUB 1.25 billion). While TSUK found several announcements of this project in 2019, we did not find a single publication about the project after that and thus no evidence it has or is likely to be implemented.

The only other infrastructure project cited in a Bloomberg article footnoted by the TRA³¹ is Vostok Oil by Rosneft. However, the day after Bloomberg announced that it was a potential candidate for government support, Rosneft issued a press-release stating that this project does not qualify for state funding.³² Rosneft also stated that it was considering the possibility of suing Bloomberg for their publication. It must be noted that this information is publicly available and was also available long before the publication of the SEF and the Recommendation. Note that the other two articles cited by the TRA contain no specific projects on which spending (if any) would be directed.³³

In view of the above, TSUK wishes to emphasize that none of the large-scale infrastructure projects referenced by the TRA (by a reference to four news articles) even started as of September 2021. Moreover, for most of them, the Russian government itself acknowledged that the projects will be significantly delayed with no evidence of them taking place in the coming years. TSUK submits that the TRA failed to verify the arguments submitted by the Ministries and relied on outdated and factually incorrect publications in its analysis. Therefore, the TRA’s conclusion that domestic consumption in Russia will increase due to large-scale infrastructure projects is flawed and contradicts the actual and recent information about such projects.

TSUK notes that positive evidence available to the TRA suggests that domestic demand in Russia will not increase significantly in the coming years. Indeed, as acknowledged

²⁸ Vedomosti (<https://www.vedomosti.ru/economics/characters/2021/06/16/874424-megaproekt-dolzhen>). English translation is available in Annex 7.

²⁹ Kommersant (<https://www.kommersant.ru/doc/4048002>). English translation is available in Annex 8.

³⁰ Aviation Explorer (<https://www.aex.ru/news/2020/9/14/216695/>). English translation is available in Annex 9.

³¹ Recommendation, footnote 63, see <https://www.bloomberg.com/news/articles/2021-03-16/russia-mulls-spending-wealth-fund-billions-on-infrastructure>

³² Rosneft (<https://www.rosneft.ru/press/releases/item/205469/>). English translation is available in Annex 10.

³³ Recommendation, footnote 63, see also <https://www.reuters.com/article/us-russia-economy-wealthfund-idUSKCN2DE2QK> and <https://www.wsj.com/articles/russias-wealth-fund-to-ditch-dollar-amid-u-s-sanctions-threat-11622730123>

by the TRA and the Ministries, domestic consumption of WTP in Russia started to decline in 2019. As explained above, the TRA relied on the data provided by the Ministries and assessed the decline in 2019 as modest. However, TSUK has shown that according to other sources, the decline was much more significant, meaning that domestic consumption quite possibly dropped below the initial level of 2015. Moreover, the most recent data also confirms that domestic consumption is certainly not increasing and most likely is continuing to decline. In particular, according to Metal Expert, domestic consumption of welded tubes and pipes used in construction dropped by 20% in 2020.³⁴ Moreover, TMK's annual report for 2020 states that domestic consumption of welded industrial pipes increased only by 1% even amid higher demand from the construction industry.³⁵ It means that Russia's domestic consumption did not even return to its previous levels, let alone increase. This is further confirmed by TMK's domestic sales of the product concerned decreasing from 1,177kt in 2019 to 785kt in 2020 (or by a striking 33%).³⁶ Therefore, the positive evidence available from Russian producers themselves and Metal Expert as an independent and reliable source of information indicates that domestic consumption in Russia has been following a downward trend with no signs of or reasons for recovery.

In light of the foregoing, TSUK submits that the TRA reached an erroneous conclusion concerning a potential increase in Russia's domestic consumption for WTP and its alleged positive impact on capacity utilisation of Russian producers. TSUK also notes that the TRA should have reached an opposite conclusion based on the positive evidence presented by TSUK and UK Steel and also available from secondary sources.

d) Stocks of Russian producers

In its analysis of inventories of Russian producers, the TRA concluded that their stock levels increased but not significantly or sufficiently to incentivise dumping:

"To conclude, there is more, albeit limited, indication of inventories beginning to build up rather than reduce during the POI when compared to 2018. We have indicated possible reasons for this. We do not assess that this stock build up is significant relative to Russian total production or that it is at a level that is unsustainable and would incentivise dumping."³⁷

TSUK notes that this conclusion is not supported by any positive evidence and to a great extent contradicts the information that the TRA itself found in secondary sources. In particular, the TRA found information on inventories of two non-cooperating producers, MMK and Chelyabinsk pipe plant. MMK reported an increase in inventories of 32kt in the period of 2018-2019, meaning that 21% of MMK's production in that period went to stock. While we cannot assess the total stock kept by MMK, a 21% increase relative to production is indeed significant and indicates that one of the largest WTP producers in Russia is building up inventories. The TRA also noted that 2017 was a year of low production for MMK and that the increase in 2018-2019 might have been intentional to rebuild stock. TSUK notes that, first, MMK's production in 2017 was not extraordinary low (65kt as compared to 73kt in 2018 and 79kt in 2019). Moreover, in 2016, MMK's production was 82kt, which is the highest level in the last 6 years, meaning that might have already had a high level of stock from the previous years. TSUK believes that this assumption is equally, if not more, valid than the TRA's speculation about MMK's motivation for building up stock. Importantly, the TRA cannot possibly verify its

³⁴ Statistical data from Metal Expert, "CIS tubes and pipes market" (available through subscription at <https://metalexpert.com/en/services/tubesandpipes>).

³⁵ TMK's annual report for 2020, p. 26 (available at the following link: <https://www.tmk-group.com/storage/annual-reports/901/tmk-ar2020-eng1.pdf>)

³⁶ TMK's annual report for 2020, p. 6 (available at the link in footnote 5).

³⁷ Recommendation, para 7.160.

assumption, which is not based on any actual data or evidence, as MMK did not cooperate with the review. The only fact that the TRA can reliably take into account is a significant increase in MMK's inventories in the period of 2018-2019 (by 21% relative to production).

Financial accounts of Chelyabinsk pipe plant show an increase in inventories of 27% (from 6.247 million roubles in 2018 to 7.932 million roubles in 2019). The TRA stated that it was not unclear whether the increase in value was related to a growth in volume. In this respect, TSUK submits that this appears to be the only reasonable explanation, as the exchange rate of Russian rouble remained practically the same in that period (USD 1 = RUB 62 in 2018, USD 1 = RUB 64 in 2019).

In view of the above, TSUK submits that inventories of Russian non-cooperating producers significantly increased, both relative to production (in case of MMK) and generally (in case of Chelyabinsk pipe plant). It is unclear to TSUK how the TRA could have reasonably reached a conclusion that the increase in inventories was not significant. In addition, while the TRA mentions that there is *"more, albeit limited indication of inventories beginning to build up rather than reduce"*, this is in fact the only evidence the TRA had in order to assess the level of stock held by Russian non-cooperating producers.

e) Attractiveness of the UK market

In the Recommendation, the TRA concluded that the UK market is unlikely to be a priority for Severstal, which reduces the likelihood of dumping.³⁸ For other Russian producers, the TRA found that they would be able to compete in the UK market without dumping, which makes the UK market more attractive to them and reduces the likelihood of dumping.³⁹

Furthermore, in both cases, the TRA seems to have based its decision on the following factors:

- Likely UK landed price of Russian producers, including Severstal, would enable them to compete and gain market share in the UK without dumping;
- There is no evidence of Russian producers exporting at dumped prices to other third countries;
- Russian producers have easier access to other markets and have not exported the product concerned to the UK even before of the anti-dumping measures by the EU.

TSUK is surprised to see that the TRA disregarded or simply ignored numerous arguments submitted in this respect. As a preliminary remark, TSUK believes that the TRA misunderstood the practical meaning of its own conclusion that the UK market is attractive to Russian producers. Indeed, attractiveness of the market does not reduce the likelihood of recurrence of dumping, as directly stated by the TRA. To the contrary, in the current circumstances of Russian producers, it significantly increases such a risk. In TSUK's opinion, it is important to reiterate the main factors present in this case that affect the incentive for Russian producers to export at dumped prices to the UK. First, positive evidence clearly shows that domestic consumption in Russia is decreasing with no signs of recovery, let alone a substantial increase in the coming years. As a result, major Russian producers, such as MMK and TMK, have been losing their domestic sales. Russian producers, including Severstal, have significant spare capacities as the TRA has correctly conceded. This factor is particularly important – and has been ignored by the TRA in its attractiveness test – as having spare capacity is very harmful to steel

³⁸ Recommendation, para 7.265.

³⁹ Recommendation, para 7.206.

producers. In addition, inventories of Russian non-cooperating producers started to increase in 2018. Based on these facts – and not mere presumption – it is clear that Russian producers, including Severstal, have a significant incentive to export the product concerned to the UK at dumped prices.

As to the above-mentioned factors assessed by the TRA, TSUK notes the following. First, the fact that the likely UK landed price of Russian imports would allow Russian producers to compete without dumping does not in any way prevent them from dumping. In our comments on the SEF, TSUK explained in detail why basic economics of the steel industry would incentivise Russian producers to export substantial volumes at dumped prices. TSUK reiterates that the significant spare capacity of Russian producers is the key factor increasing the likelihood of recurrence of dumping. Moreover, the TRA itself acknowledges that “[Russian producers / Severstal] could decide to limit their profits and dump on the UK market in order to gain a more assured or larger market share”.⁴⁰ This finding is crucial for understanding the incentive for Russian producers and Severstal specifically to sell at dumped prices, yet the TRA pays almost no attention to it. Further, by decreasing their prices (to dumped level) but thereby increasing their sales volume, Russian producers may be able to make larger total profits (even if the profit per unit is reduced). As such, it may well be the most profitable and rational strategy for Russian producers to sell at low (dumped) prices but in large volumes. Finally, the TRA also stated that their calculation of the likely UK landed price is “based on indicative prices only, and we have treated this with caution in the context of the overall, holistic, dumping likelihood assessment”.⁴¹ However, it appears to TSUK that the TRA to a great extent based its decision on a finding that must have been treated with caution.

Second, TSUK notes that the TRA did not address the arguments submitted in response to the SEF concerning dumping of Russian producers in third countries. Therefore, TSUK is not able to provide any new evidence in this respect. For this reason, TSUK reiterates that the TRA’s conclusion that there is “conflicting evidence” of Russian producers selling at dumped prices to third countries is factually wrong. As explained by TSUK in its comments on the SEF, the TRA itself found dumping by Severstal to third countries but disregarded it because it occurred due to different individual PCNs per market. This remains a striking oversimplification. Dumping almost always occurs due to individual PCNs, which are frequently not sold in the domestic market, and it is very rare – and completely unnecessary – to find dumping for all PCNs simultaneously. Furthermore, the TRA also to a great extent ignored the fact that the European Commission found dumping by Russian producers to the EU, as well as to third countries, in a parallel review investigation. TSUK wishes to emphasize that the European Commission carried out a dumping assessment for Russia in general and not only Severstal, unlike the TRA. Therefore, this constitutes well-founded evidence of dumping by Russian producers in the EU and in third countries.

Finally, TSUK reiterates that the fact that Russian producers have easier access to other markets is irrelevant in the present case. First, as explained by TSUK in our comments on the SEF, the largest Russian producers of WTP have a well-developed network of related companies in Europe, which would enable them to build up sales to a new export market very quickly.⁴² In addition, TSUK once again submits that the UK market is also more attractive than the markets of CIS countries due to the strength of the UK currency. In this respect, the TRA only stated that Russian producers also produce other products that are not subject to trade defence measures. TSUK considers this statement irrelevant

⁴⁰ Recommendation, para 7.206 (for Russia in general) and para. 7.262 (for Severstal).

⁴¹ Recommendation, para. 7.262.

⁴² For instance, TMK has sales offices in Romania, Germany and Italy; Severstal has related distribution companies in Latvia and Switzerland; Chelpipe Group has a sales office for pipes and tubes in Czech Republic.

for the present case. As a part of the attractiveness test, the TRA is tasked to determine whether the UK market is attractive to Russian producers of WTP specifically and not any other products. By selling the product concerned to the UK, Russian producers would obtain a strong and stable currency, i.e. British pound, which is important to Russian producers due to the instability of their domestic currency. It is also surprising that the TRA refers to the ability of Russian producers to manufacture and sell other products to obtain a stable currency, but at the same time, it considers that Russian producers are not likely to change their product mix to increase sales of WTP to the UK if the measures are revoked.

In view of the above, TSUK submits that the TRA misinterpreted the attractiveness of the UK market and erroneously concluded that Russian producers will not have an incentive to export to the UK at dumped prices. TSUK submits that positive evidence indicates that the UK market is indeed very attractive to Russian producers, which gives them an additional incentive to dump.

3 THE OUTCOME SOUGHT

In light of the foregoing, TSUK respectfully requests the TRA to reconsider its original decision and re-include CN code 7306 30 72 (TARIC code 7306 30 72 80) into the scope of the measures and maintain the measures against Russian producers, including Severstal.

The Applicant reserves its right to provide further comments and evidence directly or jointly with UK Steel at a later stage of the reconsideration process and welcomes any questions the TRA may have.

Yours faithfully,

Vlad Darahan
International Trade Manager
Tata Steel UK Ltd.