

Anti-Dumping Questionnaire for interested parties and contributors Case TD0010: HFP Rebar exported from the People's Republic of China

Period of Investigation (POI):	1 April 2020 to 31 March 2021
Injury period:	1 April 2017 to 31 March 2021
Deadline for response:	5 July 2021
Contact details:	TD0010@traderemedies.gov.uk
Completed on behalf of:	<i>UK Steel (part of Make UK, the Manufacturers' Organisation – legally registered as EEF Limited)</i>

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

- Confidential
 Non-confidential – will be made publicly available

Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 5 July 2021.

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Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry.

The Trade Remedies Authority (TRA) will carry out a transition review of each trade remedy measure active under the EU system that the UK has decided to maintain after EU exit. This transition review will consider whether the anti-dumping amount is necessary or sufficient to offset dumping of HFP Rebar from the People's Republic of China and whether there would be injury to the UK industry if the measure was removed.

Why should I take part?

We are asking contributors and interested parties to complete this questionnaire to inform our review of whether the current anti-dumping amount should be maintained, varied or revoked.

Please refer to our online guidance to understand more about [how we carry out transition reviews into EU measures](#) and the [differences between interested parties and contributors](#).

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by 5 July 2021. We may send a notice asking for clarification or supplementary information where necessary. Make sure you provide the sources for any information or data you don't own and clearly state any restrictions on sharing it.

Where can I find more information?

Our [trade remedies guidance](#) provides more information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at TD0010@traderemedies.gov.uk. For general information about trade remedies processes, please see our [online guidance](#).

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *the Trade Remedies (Dumping and*

Subsidisation) (EU Exit) Regulations 2019 (as amended) and under the Taxation (Cross-border Trade) Act 2018.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire by the due date. We will publish the non-confidential version on the public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.
- Please ensure that you remove or redact any personal data (including but not limited to names, signatures, contact details and job titles) from the non-confidential version of the questionnaire, which is to be uploaded to the public file by the TRA. Where personal data has been removed, please note this in the non-confidential summary/version of the questionnaire.

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

How to complete this questionnaire

All statements should be substantiated with relevant data, information and the sources of these. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all your supporting documents, including any calculations made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is “zero”, “no” or “none”, please write this.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments 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 should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Unless otherwise stated, ‘year’ or ‘calendar year’ refers to the period 1 January – 31 December and ‘quarter’ refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- 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).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand). Please ensure that all numbers which represent increasing costs and sales are reported as positive figures, and decreasing costs and sales are reported as negative figures.
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g. £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.
- All figures should be reported net of recoverable tax unless otherwise stated.
- Please refer to the case number, TD0010, in any correspondence with the TRA.

What happens next

Once you have completed your questionnaire responses, you must upload confidential and non-confidential versions along with any additional documents you're providing through our [Trade Remedies Service](#). 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; and
- the non-confidential responses will be placed on the public file.

For further information please refer to our guidance on [how we carry out transition reviews into EU measures](#).

The scope of this review

Goods subject to review

This review covers **HFP Rebar** exported from **the People's Republic of China**, described as:

High fatigue performance iron or steel concrete reinforcing bars and rods made of iron, non-alloy steel or alloy steel (but excluding of stainless steel, high-speed steel and silico-manganese steel), not further worked than hot-rolled, but including those twisted after rolling. These bars and rods contain indentations, ribs, grooves or other deformations produced during the rolling process or are twisted after rolling; The key characteristic of high fatigue performance is the ability to endure repeated stress without breaking and, specifically, the ability to resist in excess of 4.5 million fatigue cycles using a stress ratio (min/max) of 0.2 and a stress range exceeding 150 MPa.

These **goods subject to review** are currently classifiable within the following commodity code(s):

7214200010
7228302010
7228304110
7228304910
7228306110
7228306910
7228307010
7228308910

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.

SECTION A: About the case

A1 General information

1. Please complete the table below. Make sure the point of contact you name has the authority to provide this information.

Name (point of contact):	Confidential
Address:	UK Steel, Broadway House, Tothill Street, London SW1H 9NQ
Telephone No:	Confidential
Email:	Confidential
Website:	https://www.makeuk.org/about/uk-steel

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

Company registration number:	05950172
Place of registration:	Broadway House, Tothill Street, London, SW1H 9NQ
Legal name of organisation:	EEF Limited
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited Company
Position in the organisation:	Trade and Economics Policy Manager
Year of establishment:	1896
Other operating names:	Make UK

2. Please explain your interest in this review.

<p>UK Steel represents the interests of the UK's steel producing companies, including those of the product forming the subject of this transition review: HFP Rebar</p> <p>UK Steel welcomes the opening of this transition review. It is critical that the transitioned anti-dumping measures on HFP Rebar from the People's Republic of China be maintained at their current levels.</p>
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Appendix reference:

A2 Information about this review

For each question, please give any information you feel is relevant to the case. If you have no information, please say so in your answer. This transition review will consider whether the current anti-dumping amount is necessary or sufficient to offset dumping and whether there would be injury to the UK industry if the measure was removed.

1. Please provide any information about the goods subject to review that you consider relevant.

HFP rebar is manufactured in steel plants according to the following process. First, billets are reheated to around 1150°C in a gas furnace. Billets are a semi-finished product that can be made either from iron ore and metallurgical coal in a blast oxygen furnace (BOF) or from scrap in an electric arc furnace (EAF). Reheating makes the steel softer and more deformable, so the final shape can be produced more economically, and using less energy. Once up to temperature the billets are pushed into the rolling stands, each of which has a pair of grooved cylindrical steel rolls. As the steel is forced through the grooves, the area of the cross section is reduced. This process is repeated continually over several stands, with the cross section reduced each time until the required dimensions are achieved. Notches are cut into the grooves of the final rolling and the steel that fills these notches forms the ribs on the bar surface. In order to achieve the strength and ductility of grade 500C reinforcing steel, the steel is cooled by high pressure water jets. This results in a hard, strong surface with a soft, ductile central core. This process is known as quench and self-temper (QST). Once cooled the bars are sheared to a length of around 80 metres and transferred to a cooling bed where they cool further in still air. The bars are then sheared to the required customer lengths, bundled, labelled, and moved into storage, awaiting despatch.

HFP rebar is used to reinforce (principally concrete) structures, to strengthen and hold the concrete in tension. As such, it must be able to resist repeated stresses, for example, cars passing over a highway structure, repeated wind or other stresses on a concrete building, etc. The construction industry is the principal end user of the product concerned; the industry uses it extensively to reinforce concrete structures. It resists tension, compression, and temperature variation in reinforced concrete because the surface protrusions on a deformed bar inhibit longitudinal movement relative to the surrounding concrete.

The product definition corresponds to the requirements of the British Standard BS4449 and is typically distinguishable by CARES certification and markings on the rebars themselves. The machinery used for the production of HFP rebar is the same as that of wire rod and rebar, as such production capacity can be switched between products.

For the production of long products, such as HFP rebar, rebar and wire rod, the manufacture of billet represents 90% of the total manufacturing cost. The process of producing the billet will differ depending on if it's made in a BOF or an EAF facility. But once the billet is made, the rolling mill process and cost for turning the billet into a finished long product is the same. The rolling lines are typically the same for all the initial stages of production of wire rod and rebar and it is only at the very final stage that the mill splits to the last lines of production to add the ribs onto rebar. The fact that the production process is identical up to that very final stage results in a clear interchangeability between the two products and they are therefore often produced by the same mills. This is also the case for UK producers Celsa UK and

Liberty Steel UK. Producers will also substitute the production of one for the other in response to changing demand patterns.

Based on the fact that HFP rebar, rebar and wire rod are interchangeable in terms of production technology, any data and analysis for the rebar market is identical to that for the HFP market. Wire rod has a different end-use market but in terms of production process and cost structure, it is also directly relevant to rebar and HFP rebar.

Since Liberty Steel only recently started producing rebar, the injury period for this review largely related to the production of HFP rebar by Celsa UK, primarily under tariff code 7214200010. However, the remainder of the tariff codes that are part of this review under 722830 are like products and directly compete with Celsa's and Liberty's product. Indeed, there can be no question of removal of these product codes as this would open up huge potential for circumvention. They have to remain covered by the measure. Dumped imports of any of the products within scope would directly impact Celsa's and Liberty's profitability and market share and would therefore cause serious injury to the UK producers.

NB: Whilst Liberty Steel has not registered as an interested party for this investigation, UK Steel can confirm that the company fully supports the retention of the measures and this submission from UK Steel. (please see letter in Annex 9)

Appendix reference: Appendix section 1.2

2. Provide any information which you think could help us assess the likelihood of dumping occurring if the existing anti-dumping measure for the goods subject to review no longer applied.

Please refer to Section 1 of the Appendix.

Appendix reference:

3. Do you think there would be injury to the UK industry if the existing anti-dumping measure for the goods subject to review no longer applied? Provide any information supporting your conclusions including what the cause of this injury would be. You can refer to our [guidance on how we assess injury](#) for a definition of injury.

Please refer to Section 2 of the Appendix.

Appendix reference:

4. Please provide any information about the possible economic effects on the UK if the existing anti-dumping measure on the goods subject to review were no longer applied.

Please refer to Section 3 of the Appendix.

Appendix reference:

5. If you have any other information which may help us with this review, such as market distortions, please provide it below.

Please refer to Sections 4-6 of the Appendix.

Appendix reference:

SECTION B: Next steps and declaration

Next steps

Once you have completed all parts of the questionnaire, the declaration below should be signed by an authorised official of your company.

Please submit this questionnaire through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **5 July 2021**.

Please ensure that you remove or redact any personal data (including but not limited to names, signatures, contact details and job titles) from the non-confidential version of the questionnaire, which is to be uploaded to the public file by the TRA. Where personal data has been removed, please note this in the non-confidential summary/version of the questionnaire.

A confidential and non-confidential version of the questionnaire must be submitted. You can find guidance on how to complete confidential and non-confidential versions in our guidance on [how to submit 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 that you understand that the information you submit may be subject to verification by the TRA.

Company name: UK Steel (part of Make UK, the Manufacturers' Organisation – legally registered as EEF Limited)

05/06/2021

Date

Signature of authorised official

Name and title of authorised official