



Pre-Sampling Questionnaire (Exporter)

Transition review of anti-dumping measures

Case TD0011: Certain cold rolled flat steel products exported from the People's Republic of China and the Russian Federation

Period of Investigation:	1/04/2020-31/03/2021
Injury Period:	1/04/2017-31/03/2021
Deadline for response:	19/05/2021
Case Team Contact:	Zoe Manson
Completed on behalf of:	NLMK Group

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

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version**. Both copies should be returned to TRID using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **19/05/2021**.



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The scope of this review

Goods subject to review

This review covers flat-rolled products of iron or non-alloy steel, or other alloy steel but excluding of stainless steel, of all widths, cold-rolled (cold-reduced), not clad, plated or coated and not further worked than cold-rolled (cold-reduced), but not including:

—flat-rolled products of iron or non-alloy steel, of all width, cold-rolled (cold-reduced), not clad, plated or coated, not further worked than cold-rolled, whether or not in coils, of all thickness, electrical,

—flat-rolled products of iron or non-alloy steel, of all width, cold-rolled (cold-reduced), not clad, plated or coated, in coils, of a thickness of less than 0,35 mm, annealed (known as ‘black plates’),

—flat-rolled products of other alloy steel, of all width, of silicon-electrical steel, and

—flat-rolled products of alloy steel, not further worked than cold-rolled (cold-reduced), of high-speed steel.

These are originating in the People’s Republic of China and the Russian Federation, currently classifiable within the following CN code(s):

72 09 15 00 90

72 09 16 90 00

72 09 17 90 00

72 09 18 91 00

72 11 23 30 99

72 11 23 80 19

72 11 23 80 95

72 09 26 90 00

72 09 27 90 00

72 09 28 90 00

72 11 23 30 10

72 25 50 80 00

72 26 92 00 10

72 11 23 80 99



72 11 29 00 19

72 11 29 00 99

72 11 23 30 91

72 09 18 99 90

72 09 25 00 90

72 26 92 00 90¹

These commodity codes are only given for information.

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

Like goods

In addition to seeking information about your company’s export sales to the UK of the goods subject to review, this pre-sampling questionnaire will also ask about your sales of like goods in your domestic market and to third countries. Any reference to **‘like goods’** in this pre-sampling questionnaire refers to goods 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 goods subject to review or like goods.

Instructions

The Trade Remedies Investigations Directorate (TRID) of the United Kingdom’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 measure for certain cold-rolled flat steel products from the People’s Republic of China and the Russian Federation is necessary or sufficient to offset dumping and whether there would be injury to the UK industry if that measure was removed.

¹ As set out in the UK Global Tariff. For more details on the UK Global Tariff, and the commodity codes above, please [click here](#).



I - Why you are being asked to complete this pre-sampling questionnaire

We are seeking your cooperation as an **overseas exporter** of the goods subject to review, to inform our review of whether the current anti-dumping measure should be maintained, varied or discontinued.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of overseas exporters of the goods subject to review from the Russian Federation complete this pre-sampling questionnaire, we will use the information each one provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

For more information in relation to this case, you may refer to the Notice of Initiation published at: www.trade-remedies.service.gov.uk/public/cases.

If you are sampled for further investigation, we will provide you with a further detailed questionnaire. By submitting a completed detailed questionnaire response, you might become eligible for an individual anti-dumping amount, if we are recommending that measures are continued following this review. Please refer to [Section C](#) for more information on individual anti-dumping amounts.

If you do not complete this pre-sampling questionnaire or the detailed questionnaire, you could be found to be non-cooperating. For more details on how this may affect you, please consult our [operational guidance on non-cooperation](#).

II – Who should complete this form

You should complete this form if you are an **overseas exporter** of certain cold-rolled flat steel products exported from the Russian Federation ('the goods subject to review').

If you are not an **overseas exporter**, please complete either the relevant Pre-Sampling Questionnaire or the Contributor Registration Form.

III – Deadline for response

A completed pre-sampling questionnaire must be submitted to TRID by no later than **19/05/2021**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact **Zoe Manson, Lead Investigator, TD0011@traderemedies.gov.uk**.



IV – Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by the due date. Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header. It is your responsibility to ensure that the non-confidential version does not contain any confidential information.

Please see <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-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 <https://www.trade-remedies.service.gov.uk/public/cases/>.

V – Period of Investigation

The Period of Investigation (POI) referred to in this pre-sampling questionnaire is: **1/04/2020- 31/03/2021**.

VI – Injury Period

The Injury Period referred to in this pre-sampling questionnaire is: **1/04/2017- 31/03/2021**.



Section A – Activities of your company and any associated parties

A1 – Your company's activities

To determine your company's role for the purpose of this review, please select the activity/activities of your company below. For a definition of goods subject to review and like goods please refer to above section 'the scope of this review'.

- overseas exporter of the goods subject to review
 other (please give details below)

If you have selected 'other', please describe the role of your company with regards to the goods subject to review or the like goods:

Please answer here

Please describe your interest in this case:

The NLMK Group is the producer of the cold rolled flat steel, which used to be sold inter alia to the EU and Great Britain. After the biased investigation in 2016 the European Commission imposed restrictive anti-dumping tariffs on the Russian origin products concerned. As the result, our company lost the established business relations with our British customers. We consider the current case as the chance to show in impartial procedure that the current measures are not based from the legal and economic point of view, they are affecting British companies operations and should be terminated.



A2 – Associated parties and operational links

Please give details of all associated parties involved in the production and/or sales (export and/or domestic) of the goods subject to review or like goods during the POI. 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](#).

Examples of activities could include manufacturing, exporting, purchasing, warehousing, sales (domestic), sales (export), further processing of the goods subject to review or like goods.

	Company name	Company location (city, country)	Activities	Relationship
Your company	<i>Novolipetsk steel</i>	<i>Russia, Lipetsk</i>	<i>Production</i>	<i>Parent company</i>
Associated Party 1	<i>NLMK Trading S.A.</i>	<i>Switzerland, Lugano</i>	<i>Trading</i>	<i>Related company</i>

+ Add additional rows as required



Section B – Production and sales volumes

B1 – Production

Please fill in your company's total production volume and capacity for the goods subject to review and like goods in the table below.

	Volume (kg)
Overall production of the goods subject to review and like goods during the POI	91
Total production capacity of the goods subject to review and like goods during the POI	100

B2 – Sales volume and value

Please provide the total sales volumes and sales price values in the table below.

	Volume (kg)	Value in RUB
Total export sales of the goods subject to review to the UK in the POI manufactured by your company	0	0
Total export sales of the goods subject to review to the UK in the POI not manufactured by your company	0	0
Total domestic sales of like goods in the POI manufactured by your company	[870 308 679 - 1 120 397 379]	[40 067 201 441 744 - 51 580 765 074 429]
Total domestic sales of like goods in the POI not manufactured by your company	0	0



Section C – Individual anti-dumping amount

If TRID decides to sample overseas exporters, and you are **not** selected for this sample, please indicate whether you would like to complete the detailed questionnaire.

By submitting a completed detailed questionnaire response, you might become eligible for an individual anti-dumping amount, if we recommend continuing measures following this review.

- Yes
 - No

If you are **not** selected for this sample and you then do **not** choose to complete a detailed questionnaire, you will not be eligible for an individual anti-dumping amount. Your anti-dumping amount will be determined based on the amounts imposed on the overseas exporters in the sample.

Please note:

If we recommend that a trade remedy measure continues following this review, and you have requested an individual anti-dumping amount, please note that you will be required to supply the necessary information within the given timeframe for us to calculate this for you.

TRID must accept an overseas exporter's request for an individual anti-dumping amount and calculate an individual amount, providing that:

- the information required is complete and submitted on time; and
- the number of requests for individual calculations does not unduly burden the review and risk delaying its conclusion.



Section D – Additional information

Please provide any other relevant information which you think would be useful to help our investigation in the box below.

This may include:

- other interested parties you believe should receive a questionnaire;
- any initial views you have about the possible existence of a particular market situation in the domestic market of the exporting country or territory such as:
 - situations/distortions in the domestic market of the exporting country where prices are artificially low;
 - significant barter trade;
 - prices reflect non-commercial factors; or
 - any other reasonwhich means it is not appropriate to use the comparable price to determine the normal value of the goods subject to review; or
- the scope of the investigation;
- anything else you consider relevant.



We would like to share the following information with the Department:

- We are sure that the initial measures imposed in 2016 by the European Commission were not based from the both legal and economic point of view. The European Commission prosecuted the investigation with several violations, which are now challenging in the EU General Court and in the Dispute Settlement Body of the WTO. That is why we see no justification to prolong them.
- There were no NLMK sales of cold rolled steel to the UK during the PoI, which means that there is no dumping or injury.
- There is no risk of injury as the prices on the cold rolled steel in Russia has grown significantly, almost doubled during the last 6 months: from 41 974 Rub per ton to 81 167 per ton (EXW) driven by rising demand. This makes it is simply non-logical to export the product on the dumping prices conditions.
- Dumped sales are not only not economically interesting for Russian manufacturers, it is even impossible. Russian Government concerns about enormous steel prices growth has led to strict monitoring of the Russian manufacturers operations, including Russian Antitrust body investigation. Moreover, there is the project of the law published on the regulations.gov.ru (Official website for legal projects), which gives the Government the right to ban steel export in case of sharp prices growth on the Russian market. We need to highlight that selling steel to the UK below the normal value can even can cause the long term consequences for the Russian producers on the domestic market.
- Russian price trend is following worldwide price trend, the price raise has grown in all regions, including the UK market (<https://www.mane.co.uk/news/another-steel-price-rise-hits-uk-construction-261271/>). For example, the prices in the EU has grown from 657 USD/t to 1423 USD/t per 6 months (CIF Antwerp). Such materials price growth is caused by the supply deficit and growing demand, which already lead to the freeze of the key infrastructure projects. Nothing like this has happen since 2004. The consumers industries fear more price increases to come. For example, British Construction Council even admits that “availability of steel remains problematic”, which is set to continue for months before it eases. Aecom, the infrastructure consultancy, estimates that shipping delays are growing in the UK: cold-rolled steel joists will take nearly five months to arrive, compared with the usual six weeks. We would like to outline that all the import barriers on steel products in such situation should be eliminated.



In addition, as part of this review, we will conduct an Economic Interest Test to assess whether a measure is in the economic interest of the UK. As part of this process, we would like your help to identify upstream and downstream industries which may wish to contribute to our review. If possible, please provide the names and contact information for any UK-based companies operating upstream or downstream of your business in the supply chain for the like goods.

We suppose the following market players would be interested in the case:

- **Trader**
Stemcor, Longbow House, London, EC1Y 4TW, groupenquires@stemcor.com

- **Automobile production**
 - **UK Company Headquarters**
Bentley Motors Limited
Pyms Lane, Crewe, Cheshire, CW1 3PL, England
+44 (0) 1270 255 155
 - **Aston Martin Lagonda Limited**
Banbury Road
Gaydon
Warwick
CV35 0DB
United Kingdom
 - **Lotus Cars**
+44 (0) 1953 608000
pr@lotuscars.com

 - **The Society of Motor Manufacturers and Traders**
71 Great Peter Street
London
SW1P 2B
Switchboard: +44 (0)20 7235 7000
Fax: +44 (0)20 7235 7112

- **Construction**
 - **The Construction Industry Council (CIC)**
The Building Centre, 26 Store Street, London, WC1E 7BT
Telephone: 020 7399 7400
Email: enquiries@cic.org.uk

 - **The Construction Equipment Association**
Tel: +44 (0)20 8253 4502 **E-mail:** info@thecea.org.uk
Main Address: Unit 19 Omega Business Village, Thurston Road, Northallerton, DL6 2NJ

 - **Association of Manufacturers of Domestic Appliances**
Vintage House, 36-37 Albert Embankment, London, SE1 7TL,
info@amdea.org.uk