



**Pre-Sampling Questionnaire (Producer)**  
**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:**

**Injury Period:**

**Deadline for response:**

**Case Team Contact:**

**Completed on behalf of:**

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](http://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 90<sup>1</sup>

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

This pre-sampling questionnaire asks for information about your company's imports and sales of goods which are **like** the goods subject to review. Any reference to **'like goods'** in this pre-sampling questionnaire refers to goods produced in the UK or imported to the UK from a country other than **the People's Republic of China and the Russian Federation** which are like the goods subject to review in all respects, or with characteristics closely resembling them.

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

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



## 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.

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

We are seeking your cooperation as a **UK producer** or **trade or business association** representing the interests of UK producers of the like goods, 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 UK producers 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 about this case, you may refer to the Notice of Initiation published at: [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases).

### II – Who should complete this form

You should complete this form if you are a **UK producer** of certain cold-rolled flat steel products ('the like good').

If you are not a **UK producer**, 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 as an interested party 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 on the scope of this review.

- producer of the like goods in the UK  
 other (please give details below)

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

*Please answer here*

Please describe your interest in this case:

Tata Steel UK (TSUK) is the major producer of cold-rolled flat steel products in the UK. Imports of the product concerned from Russia and China are in direct competition with TSUK in the UK market. As a result, recurrence of dumped imports from Russia and China would have a direct negative impact on TSUK. In view of this, TSUK submits that the anti-dumping measures under review must be extended for another 5-year period. At a later stage of the investigation, TSUK will also provide detailed arguments and evidence demonstrating that recurrence of dumping and material injury caused to the domestic industry is highly likely if the measures were to expire.



## 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 with associated parties could include production, domestic sales, export sales, and/or further processing of goods subject to review or like goods.

|                    | <b>Company name</b>            | <b>Company location (city, country)</b>                       | <b>Activities</b>                                   | <b>Relationship</b>   |
|--------------------|--------------------------------|---|---|---|
| Your company       | <i>Tata Steel UK Ltd.</i>      | 18 Grosvenor Place<br>London<br>SW1X 7HS                      | Production, sales and processing in the UK          |   |
| Associated Party 1 | <i>Tata Steel Nederland BV</i> | Wenckebachstraat<br>1 Velsen-Noord,<br>1951 JZ<br>Netherlands | Production, sales and processing in the Netherlands | Sister company  |
| Associated Party 2 | <i>Tata Steel Europe</i>       | 18 Grosvenor Place<br>London<br>SW1X 7HS                      | Corporate / manufacturing                           | Parent company of TSUK and TSN                                      |
| Associated Party 3 | <i>Tata Steel Ltd. (India)</i> | Bombay House,<br>24, Homi Mody Street, Mumbai,<br>India       | Production of the product concerned in India        | Ultimate parent Company and controlling party of Tata Steel UK Ltd. |

+ Add additional rows as required





## Section B – Production, sales and imports

### B1 – Production

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

|  | <b>Volume<br/>(kg)</b>          |
|--|---------------------------------|
| Overall production of the like goods during the POI        | [1,300,000,000 – 1,800,000,000] |
| Total production capacity of the like goods during the POI | [2,700,000,000 – 3,700,000,000] |



## B2 – Sales volume and value

Please provide your UK sales data for the like goods produced in the UK by your company.

|   | <b>Volume<br/>(kg)</b>    | <b>Value<br/>in GBP (£)</b> |
|---|---------------------------|-----------------------------|
| Like goods produced and sold in the UK in the POI | [150,000,000-220,000,000] | [75,000,000-120,000,000]    |

## B3 – Imports

If your company has also imported the goods subject to review or like goods from the People’s Republic of China and the Russian Federation or any other country and sold them in the UK during the POI, provide your sales data for these imported goods subject to review or like goods.

|   | <b>Volume<br/>(kg)</b>  | <b>Value<br/>in GBP (£)</b> |
|---|-------------------------|-----------------------------|
| UK sales of the goods subject to review, imported from the People’s Republic of China in the POI                                    | 0                       | 0                           |
| UK sales of the goods subject to review, imported from the Russian Federation in the POI  | 0                       | 0                           |
| UK sales of the like goods, imported from countries other than the People’s Republic of China and the Russian Federation in the POI | [800,000 – 1,400,000]   | [400,000 – 700,000]         |
| Imports of the goods subject to review from the People’s Republic of China in the POI   | 0                       | 0                           |
| Imports of the goods subject to review from the Russian Federation in the POI   | 0                       | 0                           |
| Imports of the like goods from countries other than the People’s Republic of China and the Russian Federation in the POI            | [2,100,000 – 2,900,000] | [1,100,000 – 1,600,000]     |



## Section C – 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 concerns 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.

TSUK submits that the normal value determination with respect to Chinese and Russian producers must be made based of the following:

- The existence of a 'particular market situation' in China: pursuant to Article 7(2) of the Trade Remedies (Dumping and Subsidisation) Regulation (the Regulation), it is not appropriate to use the 'comparable price' to determine the normal value of the product concerned originating in China. Therefore, we submit that an alternative methodology must be used to determine the normal value of Chinese producers.
- The existence of significant distortions in Russia and China: certain costs of Russian and Chinese producers are not representative as they are not substantially determined by market forces and are affected by significant government intervention. Such costs must be adjusted according to Article 13(1) of the Regulation.
- Non-market economy conditions prevail in China. Due to the fact that paragraph 15 of the Chinese WTO accession protocol remains in place, Article 14(1)(b) of the Regulation allows to reject Chinese domestic prices and costs for the purpose of the normal value determination and to apply an alternative methodology.
- Recalculation of the anti-dumping duties is not warranted. Article 98(8) provides TRID with discretion to decide whether recalculation of the anti-dumping duties is needed. TSUK submits that conditions for recalculation are absent in this transition review.



Please also refer to the Additional Information Submission of UK Steel for more details. TSUK reserves its right to provide detailed arguments and evidence on the above-mentioned points and other relevant aspects of the review at a later stage of the investigation.

As to the scope of the investigation and in addition to the above-mentioned points, we note that black plate is excluded from the product scope of the investigation for several reasons. [CONFIDENTIAL – information related to the production processes of TSUK and product characteristics of black plate] Therefore, we submit that black plate should remain excluded from the product scope as it is not a like product to the product concerned.

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.

N/A



## Section D – Certification

By providing the information above, you acknowledge that your company may be asked to complete a detailed questionnaire and TRID may ask to visit your premises in order to verify the questionnaire response.

The undersigned certifies that the information supplied herein is correct and complete to the best of their knowledge and belief.

The undersigned certifies that they have the authority to supply the information contained herein on behalf of **Tata Steel UK Ltd.**

Signature (including e-signature):

Name:

Position at company:

Date: **18 May 2021**