



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:	<input type="text" value="1/04/2020-31/03/2021"/>
Injury Period:	<input type="text" value="1/04/2017-31/03/2021"/>
Deadline for response:	<input type="text" value="19/05/2021"/>
Case Team Contact:	<input type="text" value="Zoe Manson"/>
Completed on behalf of:	<input type="text" value="PAO Severstal"/>

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:

PAO "Severstal" is a Russian producer and exporter of cold rolled flat steel products.

Please describe your interest in this case:

PAO Severstal participated in the original EU investigation initiated in 2016. In our opinion, the investigation suffered from certain serious faults. Severstal still has the case in the General Court of the European Union (Case T-753/16 PAO Severstal v. European Commission) and supports the Russian authorities in the WTO dispute "European Union – Anti-dumping measures on certain cold-rolled flat steel products from Russia (DS521)".

Severstal believes that the company had negative dumping margin in the original EU investigation. Now PAO Severstal would like become eligible for an individual anti-dumping amount, should such measures remain following the review.



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>PAO Severstal (Cherepovets Steel Mill)</i>	<i>Cherepovets, Russian Federation</i>	<i>Manufacturing</i>	
Associated Party 1	<i>SIA Severstal Distribution</i>	<i>Riga, Latvia</i>	<i>Sales (export to Baltic region and Easter Europe countries)</i>	<i>Owned by PAO Severstal</i>
Associated Party 2	<i>JSC Karelsky Okatish</i>	<i>Kostomuksha, Russian Federation</i>	<i>Iron ore pellets and iron ore concentrate production</i>	<i>Indirectly owned by PAO Severstal</i>
Associated Party 3	<i>JSC Olkon</i>	<i>Olenegorsk, Russian Federation</i>	<i>Iron ore concentrate production and supplier of metal scrap</i>	<i>Indirectly owned by PAO Severstal</i>
Associated Party 4	<i>JSC Vorkutaugol</i>	<i>Vorkuta, Russian Federation</i>	<i>Coking coal concentrate production and supplier of metal scrap</i>	<i>Indirectly owned by PAO Severstal</i>
Associated Party 5	<i>LLC Korpanga</i>	<i>Yakovlevo, Russian Federation</i>	<i>Iron ore concentrate production</i>	<i>Indirectly owned by PAO Severstal</i>
Associated Party 6	<i>LLC Severstal-Vtorchermet</i>	<i>Cherepovets, Russian Federation</i>	<i>Scrap metal processing</i>	<i>Directly and indirectly owned by PAO Severstal</i>
Associated Party 7	<i>JSC Severstal-Metiz</i>	<i>Cherepovets, Russian Federation</i>	<i>Steel wire production and supplier of metal scrap.</i>	<i>Owned by PAO Severstal</i>



Associated Party 8	<i>JSC Severstal Distribution</i>	<i>Cherepovets, Russian Federation</i>	<i>Sales (domestic market)</i>	<i>Owned by PAO Severstal</i>
Associated Party 9	<i>LLC Severstal Distribution *)</i>	<i>Dnepr, Ukraine</i>	<i>Sales (Ukrainian market)</i>	<i>Indirectly owned by PAO Severstal</i>
Associated Party 10	<i>CJSC Severstal Distribution</i>	<i>Dzerzynsk, Republic Belarus</i>	<i>Sales (Belorussian market)</i>	<i>Owned by PAO Severstal</i>
Associated Party 11	<i>Severstal Export GMBH</i>	<i>Manno, Switzerland</i>	<i>Sales (export to the non-CIS and non-Baltic market)</i>	<i>Owned by PAO Severstal</i>
Associated Party 12	<i>Severstal SMZ- Vsevolozhsk</i>	<i>Vsevolozhsk, Russian Federation</i>	<i>Further processing</i>	<i>Owned by PAO Severstal</i>
Associated Party 13	<i>LLC Severstal- Gonvarri- Kaluga</i>	<i>Kaluga, Russian Federation</i>	<i>Further processing</i>	<i>Indirectly owned by PAO Severstal</i>

+ Add additional rows as required

*) - LLC Severstal Distribution (Ukraine) was resellers of merchandise under review in Ukrainian market only. The company temporarily suspended its activities.



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	[2.4 – 2.8] bln
Total production capacity of the goods subject to review and like goods during the POI	[2.6 – 3.0] bln

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	-	-
Total export sales of the goods subject to review to the UK in the POI not manufactured by your company	-	-
Total domestic sales of like goods in the POI manufactured by your company	[850 – 1000] mln	[40 -48] bln
Total domestic sales of like goods in the POI not manufactured by your company	-	-



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.

Severstal has information about two other Russian producers of subject goods – PAO NLMK and PAO MMK. Russian apparent consumption for the subject goods and further processed products is growing. To the best knowledge of PAO Severstal, Russian producers operate at very high level of capacity utilization rate. There are no significant distortions in the Russian market. There is a plenty of sellers and resellers, which makes the market competitive. This, in turn, makes it is impossible for certain market participants to manipulate prices. Barter trade is absent in the Russian market. This also supports the idea of fair market prices for the merchandise in the Russian market. The domestic prices do not reflect any non-commercial factors. The markets of major inputs required for production of the merchandise are mostly competitive so the prime cost of merchandise is unaffected by any distortions.



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.

PAO Severstal does not sell the goods subject to review to the UK for a long period and does not have any information about upstream and downstream industries, which may wish to contribute to the review.

Moreover, Severstal has no information about possible the UK producers of subject goods.

According to the Platts news Tata Steel UK idled the cold mill in Llanwern in the year of 2015. The cold mill in Port Talbot had disappeared from all media reports in 2018.

No other sites manufacture the goods subject to review.



Section E – 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 his/her knowledge and belief.

The undersigned certifies that he/she has the authority to supply the information contained herein on behalf of **PAO Severstal**.

Signature (including e-signature):

X

Name:

Position at company:

Date: May 19, 2021