

## Transition Review Dumping Questionnaire for (Interested Parties/Contributors)

### Case TD0026: Hot Rolled Flat and Coil Products exported from the Russian Federation, Ukraine, the Federative Republic of Brazil and the Islamic Republic of Iran

Period of Investigation (POI):	1 April 2021 – 31 March 2022
Injury period:	1 April 2018 – 31 March 2022
Deadline for response:	5 September 2022
Contact details:	TD0026@traderemedies.gov.uk
Completed on behalf of:	The Ministry of Economic Development of the Russian Federation

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](http://www.trade-remedies.service.gov.uk)) by 5 September 2022.

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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 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 dumped imports of Hot Rolled Flat and Coil products from the Russian Federation, Ukraine, the Federative Republic of Brazil and/or the Islamic Republic of Iran are likely to continue or recur if the measure was removed and whether injury would be likely to continue or recur to the UK industry if this 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 measure 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 September 2022. 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 [TD0026@traderemedies.gov.uk](mailto:TD0026@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 *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019* 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.

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](http://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. Please 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.
- 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).
- Identify all units of measurement and currencies used in tables, calculations and lists.
- 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 refer to the case number, TD0026, 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 certain hot-rolled flat products of iron, non-alloy or other alloy steel exported from the Russian Federation, Ukraine, the Federative Republic of Brazil and the Islamic Republic of Iran, described as:

Certain flat-rolled products of iron, non-alloy steel or other alloy steel, whether or not in coils (including 'cut-to-length' and 'narrow strip' products), not further worked than hot-rolled, not clad, plated or coated.

The following product types are excluded: Products of stainless steel and grain-oriented silicon electrical steel; products of tool steel and high-speed steel; products, not in coils, without patterns in relief, of a thickness exceeding 10mm and of a width of 600mm or more; products, not in coils, without patterns in relief, of a thickness of 4.75mm or more but not exceeding 10mm and of a width of 2.05m or more.

These products are currently classifiable within the following CN code(s):

72 08 10 00 00	72 08 40 00 00	72 11 19 00 00
72 08 25 00 00	72 08 52 10 00	72 25 19 10 90
72 08 26 00 00	72 08 52 99 00	72 25 30 90 00
72 08 27 00 00	72 08 53 10 00	72 25 40 60 90
72 08 36 00 00	72 08 53 90 00	72 25 40 90 00
72 08 37 00 00	72 08 54 00 00	72 26 19 10 90
72 08 38 00 00	72 11 13 00 00	72 26 91 91 00
72 08 39 00 00	72 11 14 00 00	72 26 91 99 00

The commodity code 72 26 19 10 90 was replaced by commodity codes 72 26 19 10 91 and 72 26 19 10 95 on 9 July 2021.

These 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):	[    ]
Address:	125039, 10 build 2, Presnenskaya embankment, Moscow, Russia
Telephone No:	[    ]
Email:	<a href="mailto:mineconom@economy.gov.ru">mineconom@economy.gov.ru</a> [    ]
Website:	www.economy.gov.ru

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

Company registration number:	Not applicable
Place of registration:	Not applicable
Legal name of organisation:	Not applicable
Legal structure (e.g. limited company, sole trader, partnership etc):	Not applicable
Position in the organisation:	Not applicable
Year of establishment:	Not applicable
Other operating names:	Not applicable

2. Please explain your interest in this review.

*Goals of the Ministry of Economic Development of the Russian Federation include securing non-discriminatory and favourable conditions for Russian exporters on*

*foreign markets and ensuring due compliance of all procedures in their respect with the rules of the World Trade Organisation (WTO).*

Appendix reference:-

## A2 Information about this review

Please give any information you feel is relevant to the case. This transition review will consider whether the current anti-dumping measure is necessary or sufficient to offset the effect of 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.

*The relevant information was provided by the Russian side in the Registration form (Section B – Additional Information).*

*For convenience of the Trade Remedies Authority, please see an excerpt from the Registration form, which is particularly relevant in this case.*

*“The Ministry fails to see any WTO rule permitting the UK to apply a trade remedy measure of another WTO member, in particular the EU. For this reason, should the UK need to apply a trade remedy measure which was in force in it as an EU Member, the UK needs to conduct an anti-dumping analysis equal to an original anti-dumping investigation.*

*To recall, according to the Article 1 of the ADA “An anti dumping measure shall be applied only under the circumstances provided for in Article VI of GATT 1994 and pursuant to investigations initiated and conducted in accordance with the provisions of this Agreement.” Therefore the importing WTO Member may impose anti-dumping duties on dumped imports only if it meets following requirements, stipulated in the ADA:*

*- anti-dumping investigation has been duly conducted in compliance with Article 5 of the ADA,*

*- has been established that there are dumped imports which cause or threaten to cause material injury to the domestic industry.*

*Therefore, application of anti-dumping measures on HRFS (certain hot-rolled flat products of iron, non-alloy or other alloy steel) in the UK can be justified only if*

- 1) *full comprehensive analysis, during which all requirements of the ADA had been met, has been completed;*

- 2) *as a result of such analysis the Authority has established:*

- a) *existence of dumping to the UK in accordance with Article 2 of the ADA;*

- b) *presence of material injury or a threat of such injury to the UK HRFS industry in accordance with Article 3 of the AD Agreement;*

- c) *the causal link between dumping and injury (or a threat of injury) in accordance with Article 3 of the ADA.*

*Such a thorough analysis of the situation in the UK HRFS market has not been conducted yet. The measure was originally introduced after investigation of dumping and its effects on the HRFS industry of the EU as a whole.*



*The determinations and conclusions made during the EU anti-dumping procedures cannot be used for the purposes of current procedure, because the situation in the UK has not been specifically analyzed during the original investigation by the EU (or, at least, the Ministry fails to see any evidence of such analysis).*

*In light of the aforesaid, the review type chosen by the Authority in order to determine if application of the measure necessary, does not release the UK from the obligation to assess all of the abovementioned factors in relation to the UK HRFS market.*

*Without such an analysis of dumping, injury and a causal link specific to the UK only any decision to continue application of the measure in the UK territory will be fundamentally inconsistent with Articles 2 and 3 of the ADA.*

*Taking into account the abovementioned, the Russian side sees no grounds for initiating the review. Hence, the Russian side urges the Trade Remedies Authority to finish this review without extension of the measure.”*

Appendix reference:-

2. 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.

*The relevant information was provided by the Russian side in the Registration form (Section B – Additional Information).*

*The Russian side is of position that there would be no injury to the UK industry if the existing anti-dumping measure for the goods subject to review no longer applied.*

Appendix reference:-

3. 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.

*In our opinion, withdrawal of anti-dumping measure on HRFS in the UK, as well as safeguard measure on steel (72 and 73 groups) will have a significantly positive effect on the UK economy. In accordance with the OECD survey dated August 2022 the UK economy is slowing amid persisting supply shortages and rising inflation. Negative impact on downstream industries due to the existing anti-dumping measure on HRFS would no longer applied. We ask the Trade Remedies Authority to take into consideration the interests of the UK steel consumers that have been already suffering from sharp increase of HRFS prices and shortages for a long time.*

Appendix reference:  
<https://www.oecd.org/economy/united-kingdom-economic-snapshot/>

4. If you have any other information which may help us with this review, please provide it below.

*No comments*

## SECTION B: Dumping

### B1 Dumping

1. Do you have any information about the normal value of the goods subject to review in the Russian Federation, Ukraine, the Federative Republic of Brazil and/or the Islamic Republic of Iran? Please substantiate with evidence where possible.

*No comments*

Appendix reference: -
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2. Do you have any information about the export price of the goods subject to review from the Russian Federation, Ukraine, the Federative Republic of Brazil and/or the Islamic Republic of Iran? Please substantiate with evidence where possible.

*No comments*

Appendix reference: -
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### F2 Likelihood of dumping

1. Do you have any information about the capacity and capacity utilisation among exporters of the goods subject to review during the POI? Please provide estimates and substantiate with evidence where possible.

*No comments*

Appendix reference: -
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2. Please provide any additional information that might inform our assessment of whether imports of the goods concerned are likely to be dumped if the measure is removed.

*No comments*

Appendix reference: -
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