



Pre-Sampling Questionnaire (Exporter) Anti-dumping Transition review of anti-dumping measures

Case TD0026: certain hot-rolled flat products of iron, non-alloy or other alloy steel originating in the Russian Federation, Ukraine, Federative Republic of Brazil & Islamic Republic of Iran

Period of Investigation:	1 April 2021 – 31 March 2022
Injury Period:	1 April 2018 – 31 March 2022
Deadline for response:	11 July 2022
Case Team Contact:	TD0026@traderemedies.gov.uk
Completed on behalf of:	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 the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **11 July 2022**.



Table of Contents

The scope of this review	2
Instructions.....	5
I - Why you are being asked to complete this pre-sampling questionnaire	5
II – Who should complete this form	5
III – Deadline for response	6
IV – Note about confidentiality	6
V – Period of Investigation	6
VI – Injury Period.....	6
Section A – Activities of your company and any associated parties.....	7
A1 – Your company’s activities	7
A2 – Associated parties and operational links.....	8
Section B – Production and sales volumes	9
B1 – Production.....	9
B2 – Sales volume and value.....	9
Section C – Individual anti-dumping amount.....	10
Section D – Additional information	11

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 Russia, Ukraine, Brazil & Iran described as:

Flat-rolled products of iron, non-alloy 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.

These hot-rolled flat products are currently classifiable within the following commodity 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.

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 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 Authority (TRA) 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 **dumped imports** are likely to continue or recur and whether injury caused by the dumped imports would be likely to continue or recur should the measure for **certain hot-rolled steel** from **Russia, Ukraine, Brazil & Iran** no longer be applied.

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 **Russia, Ukraine, Brazil & Iran** 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 hot-rolled flat products of iron, non-alloy or other alloy steel** exported from **Russia, Ukraine, Brazil & Iran** ('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 the TRA by no later than **11 July 2022** If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact **James Iddiols**, TD0026@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 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.

V – Period of Investigation

The Period of Investigation (POI) referred to in this pre-sampling questionnaire is: **1 April 2021 – 31 March 2022**.

VI – Injury Period

The Injury Period referred to in this pre-sampling questionnaire is: **1 April 2018 – 31 March 2022**.



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** 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 hot-rolled flat products of iron, non-alloy or other alloy steel.

Please describe your interest in this case:

PAO Severstal participated in the original EU investigation initiated in 2016 and became eligible for an individual anti-dumping amount in EU.

PAO Severstal would like become eligible for an individual anti-dumping amount in UK, 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	Company name	location	Activities	Relationship
Associated Party 2	Company name	location	Activities	Relationship
Associated Party 3	Company name	location	Activities	Relationship
Associated Party 4	Company name	location	Activities	Relationship
Associated Party 5	Company name	location	Activities	Relationship
Associated Party 6	Company name	location	Activities	Relationship
Associated Party 7	Company name	location	Activities	Relationship
Associated Party 8	Company name	location	Activities	Relationship
Associated Party 9	Company name	location	Activities	Relationship

+ 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 tonnes
Overall production of the goods subject to review and like goods during the POI	<u>8 – 9 mln</u>
Total production capacity of the goods subject to review and like goods during the POI	<u>8 – 9 mln</u>

B2 – Sales volume and value

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

	Volume tonnes	Value in GBP (£)
Total export sales of the goods subject to review to the UK in the POI manufactured by your company	30 – 50 k	20 -30 mln
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	2 – 3 mln	1 – 2 bln
Total domestic sales of like goods in the POI not manufactured by your company	20 – 30 k	10 – 20 mln



Section C – Individual anti-dumping amount

If the TRA 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**, 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.

The TRA 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 including any information you have on the goods subject to review differing from the like goods produced in the UK;
- 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 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



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 cannot identify upstream and downstream industries which may wish to contribute to the review.