**Register as an Interested Party**

**Reconsideration of an original decision in Transition Review**

**No. TF0006: Safeguard measures on certain steel products**

|  |  |
| --- | --- |
| **Period of Investigation:** | **2013-2017** |
|  |  |
| **Most Recent Period (MRP):** | **1st January 2018 to 30th June 2020** |
|  |  |
| **Case Team Contact:** | **David George, Lead Investigator****TF0006@traderemedies.gov.uk** |
|  |  |
| **Completed on behalf of:** | Hadley Industries Plc |

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](http://www.trade-remedies.service.gov.uk)).

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# **Instructions**

### I – Note about confidentiality

You will need to submit one confidential version and one non-confidential version of this document. The content of the non-confidential version should be as similar as possible to the confidential version with only confidential details removed. Where confidential details have been removed from the non-confidential version, you should include a substantive summary that would give the reader an understanding of how the redacted information would have supported any points or arguments being made.

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. Note that ‘confidential information’ in this context includes any personal details that can be attached to a named individual. This includes names, contact details and signatures, none of which should be included in the non-confidential version.

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 document.

All information provided to the Trade Remedies Authority (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 <https://www.trade-remedies.service.gov.uk/public/case/TF0006/>

# **Section A – Your organisation’s interest in the case**

To register your organisation’s interest in this case, please complete the text boxes below. For a definition of the goods to which this reconsideration relates (“the goods”) see the [Reconsideration’s Notice of Initiation](https://www.trade-remedies.service.gov.uk/public/case/TF0006/submission/1564f120-004d-4eca-8cbd-b0b3a4f43a0f/).

1. Please describe the role of your organisation with regards to the goods.

Hadley Industries are one of the largest end users of Metallic Coated Sheets (Cat4) in the UK.

1. Please describe your interest in this case:

Hadley Industries relies on a readily available source of Metallic Coated Sheet (Cat 4) which is then processed (Cold Section Rolled) and then predominantly supplied into the UK construction sector.

Over the past 5 years, Tata UK (only manufacturer of Metallic Coated sheet in the UK) has only supplied very limited tonnes of material (Cat4) suitable for the UK construction sector.

Tata’s line in South Wales (Zodiac - Llanwern) has mainly focused on the Automotive Sector and their line in North Wales (No 6 Line at Shotton) has mainly operated as a internal feeder line for their Colorcoat products.

Based on the above, the Metallic Coated Sheet utilized by the Hadley Group has mainly been sourced via imports, with a small amount from the EU, but predominantly from elsewhere.

Note: The metallic sheet that has historically arrived into the UK from EU mills, is mostly higher grade material, often used by the automotive sector rather the “commodity grades” used by the construction sector.

Therefore any quota, which has the potential to restrict flexibility of supply, is of course of interest to ourselves, especially in a market where prices are at record levels and concerns that the global availability of material, could shortly be impacted by a change of strategy by the Chinese Government.

# **Section B – Additional information**

Use the box below to provide any other relevant information which you think would be useful to help our reconsideration.

This may include:

* other parties you believe should receive a questionnaire;
* the scope of the reconsideration; and/or
* anything else you consider relevant.

As part of this investigation, it is vital that 2 factors are considered carefully.

Firstly, it is vital that a balanced view is taken, where any impacts to the end user sector and other supply chain operators (Traders and Steel Service Centres) are investigated just as thoroughly, as those to the UK steel mills.

Secondly, that the current economic climate is considered, not just a historic calculation, based on tonnages and countries where material has been imported from in the past.

* China is no longer a major supplier into the UK market and already has antidumping import taxes associated with the Metallic Coated Sheet products (it is therefore pointless having a Country specific quota for China – as can be seen in the Q3 2021 import volumes)
* The Chinese government’s present steel strategy linked to their 5 year plan, will almost certainly reduce the volume of export of steel leaving China over the next few years. This will result in less material being available in the globally traded market and flexibility will be key when sourcing material – any UK steel quota system will reduce flexibility, especially if it allocates tonnage to particular countries.

* Covid had significant impacts to the UK steel supply chains, with stocks levels during 2021 at record low levels, which could take more than a further 12 months to recover. Therefore any import quota could result in slowing down the process of bringing stock levels back to historic levels.
* Based on the above Covid situation and also linked to Brexit, the EU mills appear to have prioritized their own domestic customers, Even mills in Italy, who have historically sent tonnes (Cat4) into the UK, are not offering tonnes at present.
* The potential trade deal discussions between the EU and US (29/09/21), could result in additional tonnes being exported from the EU/UK to the US, which again could lead to a lack of available material being available for the UK end users

# **Section C – Certification**

*Only to be completed for the confidential version of this document.*

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 his/her organisation.

Signature (including e-signature):

Name:

Position at organisation:

Date: