**Safeguard Questionnaire (Producer)**

**Safeguard measures on certain steel products**

**Case: TF0006**

|  |  |
| --- | --- |
| **Period of Investigation (POI):** | 01 January 2013 – 31 December 2017 |
|  |  |
| **Most Recent Period (MRP)** | 01 January 2018 – 30 June 2020 |
|  |  |
| **Deadline for response:** | 28 November 2020 |
|  |  |
| **Case team contact:** | Imogen Yapp, Lead Investigator, TF0006@traderemedies.gov.uk |
|  |  |
| **Completed on behalf of:** | British Steel Limited |

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

**☐**  Confidential

**X**  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)).

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# **The scope of this review**

## **Goods subject to review**

The goods subject to review in this transition review are detailed in the following table[[1]](#footnote-2):

|  |  |  |
| --- | --- | --- |
| Product category number | Product category | Commodity codes |
| 1 | Non-Alloy and Other Alloy Hot Rolled Sheets and Strips | 7208 10 00, 7208 25 00, 7208 26 00, 7208 27 00, 7208 36 00, 7208 37 00, 7208 38 00, 7208 39 00, 7208 40 00, 7208 52 10, 7208 52 99, 7208 53 10, 7208 53 90, 7208 54 00, 7211 13 00, 7211 14 00, 7211 19 00, 7212 60 00, 7225 19 10, 7225 30 10, 7225 30 30, 7225 30 90, 7225 40 15, 7225 40 90, 7226 19 10, 7226 91 20, 7226 91 91, 7226 91 99 |
| 2 | Non-Alloy and Other Alloy Cold Rolled Sheets | 7209 15 00, 7209 16 90, 7209 17 90, 7209 18 91, 7209 25 00, 7209 26 90, 7209 27 90, 7209 28 90, 7209 90 20, 7209 90 80, 7211 23 20, 7211 23 30, 7211 23 80, 7211 29 00, 7211 90 20, 7211 90 80, 7225 50 20, 7225 50 80, 7226 20 00, 7226 92 00 |
| 4A | Metallic Coated Sheets | TARIC Codes: 7210 41 00 20, 7210 49 00 20, 7210 61 00 20, 7210 69 00 20, 7212 30 00 20, 7212 50 61 20, 7212 50 69 20, 7225 92 00 20, 7225 99 00 11, 7225 99 00 22, 7225 99 00 45, 7225 99 00 91, 7225 99 00 92, 7226 99 30 10, 7226 99 70 11, 7226 99 70 91, 7226 99 70 94 |
| 4B | Metallic Coated Sheets | CN Codes: 7210 20 00, 7210 30 00, 7210 90 80, 7212 20 00, 7212 50 20, 7212 50 30, 7212 50 40, 7212 50 90, 7225 91 00, 7226 99 10  TARIC codes: 7210 41 00 30, 7210 41 00 80, 7210 49 00 30, 7210 49 00 80, 7210 61 00 30, 7210 61 00 80, 7210 69 00 30, 7210 69 00 80, 7212 30 00 80, 7212 50 61 30, 7212 50 61 80, 7212 50 69 30, 7212 50 69 80, 7225 92 00 80, 7225 99 00 23, 7225 99 00 41, 7225 99 00 93, 7225 99 00 95, 7226 99 30 90, 7226 99 70 19, 7226 99 70 96 |
| 5 | Organic Coated Sheets | 7210 70 80, 7212 40 80 |
| 6 | Tin Mill products | 7209 18 99, 7210 11 00, 7210 12 20, 7210 12 80, 7210 50 00, 7210 70 10, 7210 90 40, 7212 10 10, 7212 10 90, 7212 40 20 |
| 7 | Non-Alloy and Other Alloy Quarto Plates | 7208 51 20, 7208 51 91, 7208 51 98, 7208 52 91, 7208 90 20, 7208 90 80, 7210 90 30, 7225 40 12, 7225 40 40, 7225 40 60 |
| 12 | Non-Alloy and Other Alloy Merchant Bars and Light Sections | 7214 30 00, 7214 91 10, 7214 91 90, 7214 99 31, 7214 99 39, 7214 99 50, 7214 99 71, 7214 99 79, 7214 99 95, 7215 90 00, 7216 10 00, 7216 21 00, 7216 22 00, 7216 40 10, 7216 40 90, 7216 50 10, 7216 50 91, 7216 50 99, 7216 99 00, 7228 10 20, 7228 20 10, 7228 20 91, 7228 30 20, 7228 30 41, 7228 30 49, 7228 30 61, 7228 30 69, 7228 30 70, 7228 30 89, 7228 60 20, 7228 60 80, 7228 70 10, 7228 70 90, 7228 80 00 |
| 13 | Rebars | 7214 20 00, 7214 99 10 |
| 14 | Stainless Bars and Light Sections | 7222 11 11, 7222 11 19, 7222 11 81, 7222 11 89, 7222 19 10, 7222 19 90, 7222 20 11, 7222 20 19, 7222 20 21, 7222 20 29, 7222 20 31, 7222 20 39, 7222 20 81, 7222 20 89, 7222 30 51, 7222 30 91, 7222 30 97, 7222 40 10, 7222 40 50, 7222 40 90 |
| 15 | Stainless Wire Rod | 7221 00 10, 7221 00 90 |
| 16 | Non-Alloy and Other Alloy Wire Rod | 7213 10 00, 7213 20 00, 7213 91 10, 7213 91 20, 7213 91 41, 7213 91 49, 7213 91 70, 7213 91 90, 7213 99 10, 7213 99 90, 7227 10 00, 7227 20 00, 7227 90 10, 7227 90 50, 7227 90 95 |
| 17 | Angles, Shapes and Sections of Iron or Non-Alloy Steel | 7216 31 10, 7216 31 90, 7216 32 11, 7216 32 19, 7216 32 91, 7216 32 99, 7216 33 10, 7216 33 90 |
| 19 | Railway Material | 7302 10 22, 7302 10 28, 7302 10 40, 7302 10 50, 7302 40 00 |
| 20 | Gas pipes | 7306 30 41, 7306 30 49, 7306 30 72, 7306 30 77 |
| 21 | Hollow sections | 7306 61 10, 7306 61 92, 7306 61 99 |
| 25.A | Large welded tubes | 7305 11 00, 7305 12 00 |
| 25.B | Large welded tubes | 7305 19 00, 7305 20 00, 7305 31 00, 7305 39 00, 7305 90 00 |
| 26 | Other Welded Pipes | 7306 11 10, 7306 11 90, 7306 19 10, 7306 19 90, 7306 21 00, 7306 29 00, 7306 30 11, 7306 30 19, 7306 30 80, 7306 40 20, 7306 40 80, 7306 50 20, 7306 50 80, 7306 69 10, 7306 69 90, 7306 90 00 |
| 27 | Non-alloy and other alloy cold finished bars | 7215 10 00, 7215 50 11, 7215 50 19, 7215 50 80, 7228 10 90, 7228 20 99, 7228 50 20, 7228 50 40, 7228 50 61, 7228 50 69, 7228 50 80 |
| 28 | Non-Alloy Wire | 7217 10 10, 7217 10 31, 7217 10 39, 7217 10 50, 7217 10 90, 7217 20 10, 7217 20 30, 7217 20 50, 7217 20 90, 7217 30 41, 7217 30 49, 7217 30 50, 7217 30 90, 7217 90 20, 7217 90 50, 7217 90 90 |

Any reference to the goods subject to review refers to the product categories and CN codes covered in the table above.

Please refer to the Notice of Initiation on the case file for the countries that are exempt from the existing safeguard measure.

## **Like goods**

This questionnaire asks for information about your company’s production and sales of the goods which are **like** the goods subject to review. Any reference to ‘**like goods**’ in this questionnaire refers to goods produced in the UK which are like the goods subject to review in all respects, or with characteristics closely resembling them.

## **Directly competitive goods**

‘**Directly competitive goods**’ are goods produced in the UK which are directly competitive with the goods subject to review.

This can include goods that are not only similar to the goods subject to review, such as a different type or variety, but also include goods that occupy a position of direct competition with the goods subject to review. A directly competitive good may be one that is substitutable with the goods subject to review.

**When you are completing this questionnaire, please follow the instructions for each question to provide the appropriate information regarding the like or directly competitive goods and the goods subject to review by product category.**

# **Instructions**

## **Introduction**

The Trade Remedies Investigations Directorate (TRID) of the UK’s Department for International Trade will be carrying 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 the existing safeguard measure is necessary to address the increase in imports and whether there would be injury to the UK industry if the measure was removed. The transition review will also consider whether the existing safeguard measure should be extended.

We are seeking your cooperation as a domestic producer to inform our review of whether the current safeguard measure should be maintained, varied, discontinued and/or extended. The information your company provides will help us to determine a fair and appropriate response.

As specified on the front page of this questionnaire, the POI covers the same period as the EU steel safeguards case (January 2013 – December 2017). The data requested in this questionnaire for the POI will be used to make a recommendation on whether the existing safeguard measure should be transitioned. The MRP covers the period following the POI (January 2018 – June 2020). The data requested in this questionnaire for the MRP will be used to make a recommendation on whether the existing safeguard measure should be reduced or extended.

Please provide all the information requested by **28 November 2020**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary.

Please note that if you do not provide a confidential version and a non-confidential summary (or a statement of reasons why you cannot provide this), TRID may disregard the information you give us. The following section provides further information on what you need to do.

If you are unable 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 required and the reasons why. **Due to the restricted timeframe of this transition review, the case team’s ability to grant extensions is very limited.** We will notify you of our decision. If we are able to accommodate an extension, a note to explain this will be placed on the public file.

Please also contact the case team if you have any questions about your response or if you have any difficulties in completing the questionnaire. For general information about trade remedies processes, please visit the following website: <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process>.

TRID investigates cases under the specific provisions in Part 9 of *The Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019* asamended by the *Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under the *Taxation (Cross-border Trade) Act 2018.*

## **Preparing confidential and non-confidential copies**

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes 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.

Further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire can be found in our guidance on [how we handle confidential information](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information).

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 17 of the *Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019)* and kept 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).

## **Providing information from subsidiaries or associated parties**

Natural persons or legal persons (i.e. companies) are associated where they meet the following definition of “related persons” in Section 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies.

* If any of your subsidiaries or associated companies are also a UK producer of like or directly competitive goods, they should **also** complete this questionnaire. Please make sure you provide your subsidiaries with access to this questionnaire.
* Where your subsidiaries or associated companies are not producers but are involved in the sales of the like or directly competitive goods, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the case team using the details provided on the cover of this questionnaire.

## **What happens next**

Please upload your completed questionnaire responses and non-confidential versions of documents to our Trade Remedies Service at [www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk). You will receive an email confirming the documents have been uploaded successfully. Non-confidential responses will be placed on the public file and the case team will contact you if we need further information.

Once we have completed our review, we will publish our recommendation to the Secretary of State. Our final report will be published on our public file.

Further information on this process is available at:

[www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#determinations-and-conclusion-of-investigations](http://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#determinations-and-conclusion-of-investigations).

## **Verifying the information you supply**

TRID will verify, as far as possible, the information provided to it. As part of this process we may conduct authentication visits. Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided. Within your response to this questionnaire, please provide all formulas and steps used in your calculations and keep a record of these and all related material/documentation to assist with any authentication visit.

If we need to verify information that you provide by visiting your premises, the Case Team will contact you.

Due to the current circumstances, it may not be possible for us to carry out authentication visits. We may carry out remote authentication instead. During remote authentication we will not visit your premises but verify your questionnaire responses remotely using audio/video calls and email exchanges. Remote authentication can be conducted over several weeks.

After authentication, TRID will prepare a report and share a draft with you. TRID will then ask you to provide a summary of the information which should be kept confidential and the reasons why. We will prepare a non-confidential authentication report for the public record.

# **How to complete this questionnaire**

Please read and follow all the instructions carefully. Your company is required to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To assist with authentication please retain all such documents, your completed annexes and 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 the question is "zero", "no", “none” or "not applicable", please write this rather than leaving the answer blank.
* Please complete the Excel annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact the case team immediately.
* If there is insufficient space in any part of the questionnaire to provide the details requested, please attach 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).
* For all numerical figures, where appropriate please express every third digit with a comma (e.g. ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand).
* Limit all sales/currency/income figures to two decimal places and use the appropriate currency symbol (e.g. £1,300.00).
* Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, indicate this in the relevant answer and explain the variance from actual costs, if any.
* All financial figures should be reported net of tax unless otherwise stated.

# **SECTION A:** **Company structure and operations**

## **A1 Identity and contact details**

1. Please complete the table below ensuring that the point of contact given has the authority to provide this information:

|  |  |
| --- | --- |
| Legal name of company: | British Steel Limited |
| Legal structure (e.g. limited company, sole trader, partnership etc.) | Limited company |
| Year of establishment: | 2019 (started trading in 2020) |
| Other operating names: | None |
| Company registration number: | 12303256 |
| Place of registration: | England and Wales |
| Name (point of contact): | *Not for disclosure* |
| Position: | Legal Director and Company Secretary |
| Address: | British Steel, Administration Building, Brigg Road, Scunthorpe, North Lincolnshire, England, DN16 1XA |
| Telephone No.: | 01724 404040 (Head Office) |
| Email: | *Not for disclosure* |
| Website: | https://britishsteel.co.uk/ |

## **A2 Company information**

1. Describe the role of your company in the UK market for the like or directly competitive goods (e.g. producer, producer/exporter, producer/importer or producer/distributor).

|  |  |
| --- | --- |
| British Steel is a basic oxygen steelmaking manufacturer.  Steel products produced include Rail, Rods, Structural Sections and Special Profiles.  British Steel employs 3,500 – 4,000 people directly and over 20,000 people in the wider supply chain. With sites in Scunthorpe, Teesside, Skinningrove and Lisburn, British Steel contributes significantly to the UK economy and provides quality products into sectors such as Transport, Construction, Automotive, Lifting & Excavating and Consumer Products. | |
|  | Appendix reference: |

Please answer questions 2 to 4 below about the internal structure of your company and any associations with other companies. Natural persons or legal persons (i.e. companies) are associated where they meet the following definition of “related persons” in Section 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

1. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure and all sites/locations involved in the production, sales and distribution of the like or directly competitive goods for domestic and export markets. Clearly indicate the different production stages performed by your company.

|  |  |
| --- | --- |
| Corporate structure chart and internal organisational structure chart. | |
|  | Appendix reference: |

1. Are you a parent company or a subsidiary?

* If you are the parent company, please complete question 4 to provide information on all subsidiaries and send a copy of this questionnaire to all subsidiaries for completion. Submit the subsidiary questionnaire(s) alongside yours.
* If you are the subsidiary, please complete question 4 providing as much information as possible and send a copy of this questionnaire to your parent company. Submit the parent company questionnaire alongside yours.

|  |  |
| --- | --- |
| Subsidiary\*  \*British Steel Limited is a direct 100% subsidiary of Jingye Steel (UK) Holding Limited. Jingye Steel (UK) Holding Limited is a holding company which does not trade in its own right. British Steel Limited is the only UK company in the British Steel group which is involved in the production, sales and distribution of the like or directly competitive goods for domestic and export markets. | |
|  | Appendix reference: |

1. Please provide the following information by completing **Annex 1 – Associated companies**:

* Include your company’s worldwide corporate structure and affiliations, including parent companies, subsidiaries and/or other associated companies.
* If your company is the subsidiary of another company, please give the name of this company, as well as that of your company’s ultimate controlling entity, their registration number(s) and place(s) of registration.
* Please provide the address of the company.
* Please list the activities carried out by the company (e.g. manufacturing, administration, sales).
* Indicate the shareholdings you have in the associated company and the shareholdings that the associated company has in your company.

|  |  |
| --- | --- |
| Corporate structure chart not disclosed (in confidential version only). | |
|  | Appendix reference: |

1. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.

|  |  |  |
| --- | --- | --- |
| **Date** | **Legal form** | **Explanation of change** |
| 09/03/2020 | Acquisition | Acquisition of the business and assets of the British Steel group by Jingye Steel (UK) Holding Limited. |
|  |  |  |
|  |  |  |
|  |  |  |

*+Add additional rows as required*

1. State whether your company is a member of a representative organisation, e.g. industry associations.

|  |  |
| --- | --- |
| British Steel Limited are members of the following industry associations;   * 1. 1   2. 2   3. 3 | |
|  | Appendix reference: |

**A3 Board members and principal shareholders**

1. Please complete **Annex 2 – Shareholdings**, providing a list of all your company’s shareholders that owned more than 5% of its shares during the POI. Where known, provide details of their activities. Also include, for the last five years:

* your company’s registered capital;
* the scope of business; and
* the composition of the Board of Directors and/or shareholders, including their roles and rights.

Please provide this information for your company and all its predecessor legal entities.

|  |  |
| --- | --- |
| Principal shareholder during the POI is Jingye Steel (UK) Holding Limited (100% shareholding).  The scope of business (as described on Companies House) is manufacture of basic iron and steel and of ferro-alloys.  Board of Directors comprises the following:   * Name 1 (Chief Executive Officer) * Name 2 (Chief Operating Officer) * Name 3 (Legal Director, Company Secretary) * Name 4 (President) * Name 5 (Chief Financial Officer) * Name 6 (Director) * Name 7 (Director) | |
|  | Appendix reference: |

1. If applicable to your company, please attach the latest copy of the following documents (in the original language and in English):

* articles of association and all related documents;
* business licence; and
* proof of registration of the company with the competent authorities.

Please describe what you are submitting and provide appendix references for your attachments in the box below. Earlier copies from the date of establishment of the company until the present should be available upon request during the authentication process.

|  |  |
| --- | --- |
| Latest copy of Articles of Association and Companies House extract. | |
|  | Appendix reference: |

## **A4 Operational links with other companies or persons**

* + - 1. Please indicate if your company has established long-term agreements with any companies located in the UK or in third countries for the production (e.g. subcontracting), supply and sale of the like or directly competitive goods, or other licensing, technical patent or compensatory agreements. Include:
* the name and address of the company; and
* an explanation of the nature of the agreement.

|  |  |
| --- | --- |
| **Company name and address** | **Nature of agreement** |
| FNsteel BV, Rapenburg 1  2952 AP Alblasserdam  The Netherlands | FNsteel BV is a sister company of British Steel Limited, both companies being wholly owned by Jingye Steel (UK) Holding Limited. British Steel Limited supplies semi-finished steel products to FNsteel BV These semi-finished steel products are then rolled into steel wire rod products by FNsteel BV for sale by FNsteel BV into EU and worldwide markets. |
|  |  |

*+Add additional rows as required*

## **A5 Accounting practices**

1. Please give the financial year convention your company uses for its accounts (e.g. 1 January – 31 December). If any changes have occurred with respect to your financial year convention or in your accounting practices over the POI and MRP, please describe these changes.

|  |  |
| --- | --- |
| POI and MRP convention have been financial year 1 April – 31 March. Change to calendar year reporting will be effective 01/01/2021.Transition year from point of acquisition is 09/03/2020 – 31/12/2020. | |
|  | Appendix reference: |

1. Please confirm what basis your accounts are prepared under, i.e. local GAAP, IFRS etc.

|  |  |
| --- | --- |
| IFRS | |
|  | Appendix reference: |

1. For your company and any associated parties involved in the production, marketing or sales of your goods, please attach a copy of your annual reports for the financial period that covers the POI and MRP. This should include a statement of financial position; statement of profit and loss and other comprehensive income; statement of changes in equity; cash flow statement; notes to the accounts and all reports; and auditor's opinion on these documents.

|  |  |
| --- | --- |
| British Steel Limited accounts signed for 2016, 2017, 2018 not disclosed (in confidential version only). | |
|  | Appendix reference: |

1. If your accounts are unaudited, please attach a copy of your unaudited financial statements and corresponding tax returns for the POI and MRP.

|  |  |
| --- | --- |
| not disclosed (in confidential version only). | |
|  | Appendix reference: |

1. Please attach a copy of your company’s trial balance (in a spreadsheet) covering the POI and MRP. This includes:

* the trial balance which covers the full financial years from January to December for 2013, 2014, 2015, 2016, 2017, 2018, 2019; and
* the trial balance which covers the beginning of the financial year to the 1st July 2020.

|  |  |
| --- | --- |
| File not disclosed (in confidential version only). | |
|  | Appendix reference: |

1. For your company and any associated parties involved in the production, marketing or sales of the like or directly competitive goods, please attach copies of relevant management accounts and associated reports (e.g. profit and loss statement) for the profit centre of the like or directly competitive goods. Please provide these reports for the POI and MRP.

|  |  |
| --- | --- |
| File not disclosed (in confidential version only). | |
|  | Appendix reference: |

1. If your company is part of a group of companies, please also attach a copy of the consolidated accounts of the group for the POI and MRP.

|  |  |
| --- | --- |
| British Steel Holdings Limited’s accounts 2017 and 2018 not disclosed (in confidential version only). | |
|  | Appendix reference: |

1. Please provide a detailed description, including the name(s) of the systems, of your financial accounting system explaining how sub ledgers (e.g. costing, debtors, creditors) integrate with the general ledger. Please provide a description of how it links to the management accounting system, including any manual interventions. Please also attach:

* your company’s chart of accounts;
* your company’s cost centres; and
* a brief description of further analysis codes available.

|  |  |
| --- | --- |
| British Steel uses SAP for general ledger with AP and AR subledgers. All underlying manufacturing reporting, supply chain management and invoicing systems are legacy mainframe applications requiring the manual journaling of accounting entries into SAP. | |
|  | Appendix reference: |

1. If the accounting policies used by your company have changed over the POI and MRP, please explain the changes, including dates and reasons for them.

|  |  |
| --- | --- |
| No changes – IFRS 16 to be implemented for financial year 09/03/2020 – 31/12/2020. All other changes are in line with the Financial Reporting Council’s recommended amendments in the accounting standards, which British Steel follows. | |
|  | Appendix reference: |

# **SECTION B:** **About your goods**

## **B1 Your company’s products**

In this section, you will be asked to provide details for your like or directly competitive goods and the goods subject to review. **Please always refer to the corresponding product categories** which your like or directly competitive goods and the goods subject to review fall within.

The goods covered by this review are defined on pages 1 and 2.

1. Please comment on the scope of the review. If you consider that any product categories and/or custom codes should be added or removed, please explain the reasons why. Provide information about UK production, UK demand and UK imports for these product categories and/or custom codes. Substantiate with evidence.

|  |  |
| --- | --- |
| British Steel confirms the scope of the safeguard review. | |
|  | Appendix reference: |

1. Please complete **Annex 3 – Goods**, indicating the like or directly competitive goods you produced during the POI by product category. Provide details for each product category and the comparable goods subject to review. Please specify any differences between them.

Where possible, provide estimations of how prices of the goods subject to review imported into the UK compare to each of your like or directly competitive goods and reasons for the price differences. In the box below, describe how you established the differences and substantiate with evidence.

Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each product category where available.

|  |  |
| --- | --- |
| See Annex 3 – Goods.  B1 - 2 -british-steel-product-range-brochure | |
|  | Appendix reference: |

1. Are the like or directly competitive goods comparable in non-price factors (including product quality, lead and delivery times, reliability of supply etc.) to the imported goods subject to review? Provide this information for each of the like or directly competitive goods produced by your company and the comparable good subject to review and substantiate with evidence.

|  |  |
| --- | --- |
| Goods are comparable with regards to the factors mentioned. | |
|  | Appendix reference: |

1. Explain the internal coding system your company uses to classify your range of like or directly competitive goods. If your company uses multiple internal reference codes across departments, cross-reference each one.

|  |  |
| --- | --- |
| Products are classified according to product code, dimension, grade and length. | |
|  | Appendix reference: |

1. Please provide a written summary and, if available, a diagram/flow chart, of your production process for each of the like or directly competitive goods that you produce in the UK.

|  |  |
| --- | --- |
| BOS steel manufacturing process based in Scunthorpe.  Continuous cast products – Bloom, Billet, Slab.  Finishing mills:   * + - * Scunthorpe Rail & Section Mill – rolling and further processing Sections (Group 17) and Rail (Group 19)       * Scunthorpe Rod Mill – rolling of Wire Rod (Group 16)       * Teesside Beam Mill – rolling of Sections (Group 17)       * Skinningrove & Darlington – rolling and further processing of Special Profiles (Groups 1, 12 and 19) | |
|  | Appendix reference: |

1. Identify what parts of your production process take place in the UK. Explain the level of complexity of the manufacturing process and the investment of capital involved. Substantiate with evidence.

|  |  |
| --- | --- |
| All British Steel semi-finished products for the production of finished goods are manufactured in the UK (headquartered in Scunthorpe). Semi-finished products are also supplied from the UK to FN Steel in the Netherlands for the production of as-rolled and processed Wire Rod.  The manufacturing process is complex, as is the nature of integrated steel making sites. A relatively high level of essential replacement capex is required to keep the site operational, due to the age of its assets. | |
|  | Appendix reference: |

1. What is your pricing strategy of the like or directly competitive goods produced by your company in the UK? Provide this information for each of the like or directly competitive goods produced by your company and substantiate with evidence.

|  |  |
| --- | --- |
| All pricing strategies are developed to ensure British Steel is competitive in the market. Pricing strategies are dependent on customer size, tenure of deal, product requirements and service required. | |
|  | Appendix reference: |

1. How does your company market (i.e. encourage sales of) the like or directly competitive goods? Are you aware of whether similar methods are used for the goods subject to review? Substantiate with evidence.

|  |  |
| --- | --- |
| British Steel promotes all products via its website, social media, case studies and direct conversations with potential customers. | |
|  | Appendix reference: |

1. Please list your inputs (e.g. raw materials) in **Annex 4 – Inputs**, indicating the country of origin and whether they are imported or domestically sourced, that are used in the production of the like or directly competitive goods. Estimate the input’s average share of your total production costs for each category.

In the box below, describe how they are included in the manufacture of your company’s products.

|  |  |
| --- | --- |
| British Steel imports raw materials each year to satisfy our liquid steel production.  The following raw materials are imported through the Immingham Bulk Terminal (IBT) at the port of Immingham:   * Coking coal =   + USA   + Australia * Coke =   + Japan   + Australia   + Columbia * PCI Coal =   + UK (delivered by train – not through IBT)   + Russia * Iron Ore =   + Sweden   + Canada   + Brazil   + Australia   + South Africa | |
|  | Appendix reference: |

1. If your company is vertically integrated, or some of the inputs (e.g. raw materials) used in the production of the like or directly competitive goods are produced by an associated party, provide details of this arrangement and attach documentation demonstrating any agreements you have.

|  |  |
| --- | --- |
| *N/A* | |
|  | Appendix reference: |

1. If you purchase inputs from associated parties, provide evidence on whether the price used for these transactions are representative of a fair market price? Provide this information for each of the like or directly competitive goods produced by your company.

|  |  |
| --- | --- |
| *N/A* | |
|  | Appendix reference: |

1. Please provide the names and legal addresses of other UK producers of the like or directly competitive goods that you know of.

|  |  |
| --- | --- |
| **Company name** | **Legal address** |
| Celsa Steel UK  (Producer of wire rod) | Building 58, Castle Works,  East Moors Road,  Cardiff,  CF24 5NN |
| Liberty Merchant Bar  (Producer of light angles and channels) | Liberty Merchant Bar plc Liberty House PO Box 15 Scunthorpe DN16 1XJ |

+Add additional rows as required

## 

## **B2 Understanding the UK market**

**Answers should refer to the relevant product categories.**

1. Do you regard the like or directly competitive goods to be an intermediate and/or final good?

|  |  |
| --- | --- |
| All goods subject to review are considered final steel products. These are different to semi-finished products which are not subject to review. | |
|  | Appendix reference: |

1. Please explain the end use of your like or directly competitive goods and the comparable goods subject to review in the UK market. If there are multiple uses list them and, where possible, estimate what proportion of your sales each represents.

|  |  |
| --- | --- |
| (19)\* Railway Material – used for passenger transport and freight railway networks  (16) Wire Rod – used for construction applications, automotive, and consumables such as bedding and seating  (12,17) Sections – used in the construction of buildings such as commercial, distribution, office and high-rise  (1,12,19) Special Profiles – crane rails used for warehousing, bulb flats used in the construction of ships, track shoe and other special profile products used in Yellow Goods manufacture  \* *Note – in the following sections where it is applicable to comment on product categories specifically, the numbers used to refer to the product group correspond with the safeguard group number.* | |
|  | Appendix reference: |

1. Who are the general users/consumers/customers of the like or directly competitive goods in the UK market? Please comment on whether this is the same/different for the goods subject to review.

|  |  |
| --- | --- |
| (19) Railway Material – network providers  (16) Wire Rod – suppliers of wire rope to the Oil & Gas sector, consumer goods, businesses part of larger integrated group which limit external purchases  (12,17) Sections – channels to market via stockholders and fabricators for fabrication and erection of material on site  (1,12,19) Special Profiles – channels to market vary by product. Bulb flats and crane rails are via stockists whilst cutting edge and masts are via large OEMs | |
|  | Appendix reference: |

1. Have there been any changes to the pricing of the like or directly competitive goods in the UK market in the last four years caused by factors other than raw material costs?

|  |  |
| --- | --- |
| All products subject to review have experienced price pressures due to increased imported goods, lower demand and uncertainty due to COVID-19. Automotive supply chain issues and trade diversion resulting from Section 232, are all underpinned by the ongoing general overcapacity in the steel market.  See UK Steel Response for further information. | |
|  | Appendix reference: |

1. Please comment on the degree of price sensitivity of the like or directly competitive goods and the goods subject to review in the UK market and the reasons for this?

|  |  |
| --- | --- |
| All products are price sensitive due to the general overcapacity in the steel market – buyers have many choices and options. | |
|  | Appendix reference: |

1. What distribution methods (i.e. sales channels) are used by your company for the like or directly competitive goods? Comment, if known, whether this is similar for the goods subject to review.

|  |  |
| --- | --- |
| Please refer to answer no. 3 of this section. | |
|  | Appendix reference: |

1. Please describe the nature of competition within the UK market (e.g. how many businesses are in the market, is the market highly price competitive?).

|  |  |
| --- | --- |
| (19) Railway Material – British Steel is the only UK producer of rail, for a relatively small market size. British Steel face competition from a number of EU producers who have been importing into the UK over recent years  (16) Wire Rod –The UK market is small and has declined over recent years. Whilst there are two producers, imports continue into the UK market  (12,17) Sections – for heavy structural sections, British Steel is the only UK producer. This is a commodity product and regularly experiences high levels of imports into the UK market  (1,12,19) Special Profiles – the UK domestic market is small and British Steel is the only producer for many niche, small batch products  Whilst British Steel is the only UK producer for most of the products in review, from an economies of steel production perspective, it would not be practical or sensible in a small market to have multiple UK producers of the same products. The absence of other producers in the UK does not indicate a lack of competition in the UK market, considering the wider global overcapacity concerns. | |
|  | Appendix reference: |

1. Please describe the degree of competition between the goods subject to review and the like or directly competitive goods in the UK market?

|  |  |
| --- | --- |
| See UK Steel Response for further information. | |
|  | Appendix reference: |

1. Please outline the trends and drivers of demand in the UK market for the like or directly competitive goods and the goods subject to review, including causes of demand fluctuations and any factors contributing to overall market growth or decline (e.g. user preferences, government policy, macroeconomic conditions)?

|  |  |
| --- | --- |
| (19) Railway Material – dependent on UK Government spend for transport and infrastructure. A high proportion of requirements are for track maintenance  (16) Wire Rod – linked to construction and automotive demand  (12,17) Sections – construction sectors fluctuate and are very dependent on public and private spend schemes. In current circumstances, due to COVID-19, commercial and office sector demand has significantly reduced vs. growth seen in warehouse and distribution projects  (1,12,19) Special Profiles – Yellow Goods and construction related. The Yellow Goods market was experiencing a downturn prior to COVID-19. Since COVID-19, this has been exacerbated further with OEMs struggling to recover to previous levels | |
|  | Appendix reference: |

1. Have there been any changes in the patterns of consumption of the like or directly competitive goods in the POI and MRP in the UK market? Please elaborate.

|  |  |
| --- | --- |
| (19) Railway Material – demand has been relatively stable through both periods. Given COVID-19 impact and less rail users, impact on spend in the future is yet to be realised. This could reduce market demand and consumption in future years  (16) Wire Rod – declining UK market size. Consumables sector and automotive demand has been hit hard in MRP due to COVID-19  (12, 17) Sections – Construction market for UK sections recovered prior to MRP. The uncertainty of construction sites being able to open as a result of lockdowns impacted the sector with some consumers closing until clarity was available. Expected UK demand has reduced through this period and is steadily set to recover on the back of the UK Government Infrastructure Programme. Consumers have adopted a shorter buying timeline, so to not tie up vast amounts of stock and working capital  (1,12,19) Special Profiles – Reduced yellow goods demand has been experienced but is set to resume a more normal level depending on the next phase of COVID-19 | |
|  | Appendix reference: |

1. Is there any government regulation that has implications for the like or directly competitive goods produced by your company (e.g. regulatory costs)?

|  |  |
| --- | --- |
| EU ETS  Environmental Permitting Regulations  REACH | |
|  | Appendix reference: |

1. Please comment on whether there have been developments or changes in technology that have affected the UK market for the like or directly competitive goods in the POI and MRP?

|  |  |
| --- | --- |
| There have been no notable developments or technological advances effecting the UK market during the POI or MRP. | |
|  | Appendix reference: |

1. Please describe whether the market is segmented, where consumers are divided into groups based on specific characteristics. Does market segmentation in downstream markets cause the prices of the like or directly competitive goods and the goods subject to review to vary?

|  |  |
| --- | --- |
| Market segmentation exists within the UK Construction market with one group being Independent Steel Stockholders (ISSC’s) and the other being Fabricators. There are a few exceptions but generally the mill sells to stockists, who then sell to fabricators, therefore there are 2 levels of pricing within the market, the first being the input price to the stockists and then the outsell price from stockists to fabricators. | |
|  | Appendix reference: |

1. Please describe the current state and forecasts of the UK and world markets for the like or directly competitive goods and goods subject to review. Substantiate your comments with any documents, such as studies or articles in trade journals, that support your statement.

|  |  |
| --- | --- |
| No UK level forecasts published of relevance. World Steel Association forecasts EU demand reduction of -15.8% in 2020 followed by an increase of 10.4% in 2021. The UK is likely to face a worse demand scene given the uncertainty and additional impacts of Brexit on the economy. | |
|  | Appendix reference: |

1. Provide any other information about the UK market for the like or directly competitive goods and the goods subject to review that may be relevant for this review?

|  |  |
| --- | --- |
| N/A – all points have already been covered. | |
|  | Appendix reference: |

# **SECTION C:** **Increase in imports**

## **C1 Imports**

* 1. To transition the existing safeguard measure, there must be sufficient evidence of increased imports and/or likelihood of increased imports of the goods subject to review as a result of unforeseen developments. Please comment and provide evidence on circumstances that have led and/or were likely to lead to an increase in imports of the goods subject to review to the UK in the POI. Include an explanation of whether these circumstances were or were not foreseeable.

|  |  |
| --- | --- |
| Please refer to UK Steel Response. | |
|  | Appendix reference: |

* 1. Please comment on how imports have developed during the MRP?

|  |  |
| --- | --- |
| Please refer to UK Steel Response. | |
|  | Appendix reference: |

* 1. Please comment on the likelihood of the recurrence of an increase in imports if the existing safeguard measure were:

1. continued; or
2. discontinued.

Please substantiate with evidence.

|  |  |
| --- | --- |
| The conditions which originally led to the implementation of the safeguards remain and have in fact been exacerbated by COVID-19. Factors leading to the safeguard implementation such as global overcapacity and the risk of import surges due to S232, increased protectionism and continued state subsidies providing an unfair playing field across producers.  The safeguards need to be continued to protect the UK market, in particular if S232 and EU safeguards remain in place, otherwise the UK becomes an open market and would be subject to increased levels of imports on all products.  Please refer to UK Steel Response for more information. | |
|  | Appendix reference: |

# **SECTION D:** **Costs and sales**

## **D1 Cost to make and sell**

* + - 1. Please report your production and selling costs by completing **Annex 5 – Cost to make and sell**. All values entered in the table should be totals for each year within the POI and MRP by product category.
* Please provide costs to make and sell for:
  1. the whole company;
  2. each product other than the like or directly competitive goods that you produce; and
  3. all like or directly competitive goods that you produce by product category.
* For each of the like or directly competitive goods that you produce, clearly separate your costs to make (direct manufacturing costs and indirect costs) from your costs to sell (administrative, selling and general (AS&G) expenses).
* All figures should be reported net of tax.

|  |  |
| --- | --- |
| See Annex 5. | |
|  | Appendix reference: |

* + 1. Please explain the cost of production allocation method for each of the like or directly competitive goods produced by your company. If you have been unable to allocate some costs, please specify this and explain whether an alternative methodology has been used.

|  |  |
| --- | --- |
| All products are costed using full absorption standard costing with a price variance applied to reflect prevailing market raw materials costs. | |
|  | Appendix reference: |

1. Please explain the allocation method for selling costs for each of the like or directly competitive goods produced by your company. If you have been unable to allocate some costs, please specify this and explain whether an alternative methodology has been used.

|  |  |
| --- | --- |
| The selling costs (selling expenses) for each product reflect the costs of that sales organisation and a proportion of overhead costs not absorbed through product costing. | |
|  | Appendix reference: |

## **D2 Sales value and volume**

* + - 1. Please provide the sales value and volume information for your company in **Annex 6 – Sales** for the POI and MRP.
* Please provide the sales value and volume for
  1. the whole company;
  2. each product other than the like or directly competitive goods that you produce, and
  3. all like or directly competitive goods that you produce by product category.
* These should include all your domestic sales of the like or directly competitive goods for the POI and MRP. Include goods that you have produced and goods that you have purchased and resold.
* Please differentiate sales to associated parties.
* Please ensure that you correctly categorise each sale by product category (a table is provided for each like or directly competitive good).
* To determine which sales fall within the POI and MRP, the invoice date should be used as the date of sale. If you are unable to use an invoice date, please contact the Case Team.

|  |  |
| --- | --- |
| See Annex 6 – Sales. | |
|  | Appendix reference: |

* + - 1. Please provide a list of associated customers for the goods. Explain the nature of the association and any effect it has on the terms of sale to that customer.

|  |  |
| --- | --- |
| (12,17) Sections – internal transfer of goods to Distribution operations based in Teesside and Lisburn. | |
|  | Appendix reference: |

* + - 1. Please provide details of your distribution network for the goods, if you have one. Do your sales usually include delivery? How do you calculate delivery costs and prices? Does this vary between customers?

|  |  |
| --- | --- |
| British Steel historically had a Distribution network through the POI and MRP up until 09/03/2020 when British Steel was acquired by the Jingye Group. | |
|  | Appendix reference: |

* + - 1. Where possible, provide copies of price lists for the like or directly competitive goods for the POI and MRP. Explain any changes to the price lists over the POI and MRP.

|  |  |
| --- | --- |
| Generally, price lists are customer specific. A published price list for Sections (12,17) is available on the British Steel  For other product groups there are no published price lists.  D2 -4 -sections-price-list | |
|  | Appendix reference: |

## **D3 Captive sales**

1. Please provide information on captive sales in **Annex 7 – Captive sales** for the POI and MRP detailing your company’s individual transfers of the finished like or directly competitive goods for internal or captive use.

|  |  |
| --- | --- |
| *N/A –* British Steel has no captive sales (i.e. consumers have alternative options). | |
|  | Appendix reference: |

1. Please comment on whether your captive use of the like or directly competitive goods has changed over time and what has caused the changes. Differentiate between the POI and MRP. Please attach evidence to support your answer where required.

|  |  |
| --- | --- |
| *N/A –* British Steel has no captive sales (i.e. consumers have alternative options). | |
|  | Appendix reference: |

## **D4 Purchases of the goods subject to review**

1. Complete **Annex 8 – Purchases** to report your total annual purchases of the goods subject to review for the POI and MRP. Provide the data for each product category. All figures should be reported net of tax.

|  |  |
| --- | --- |
| *N/A* – no significant purchases of products subject to review. | |
|  | Appendix reference: |

1. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of the goods subject to review.

|  |  |
| --- | --- |
| *N/A* – no significant purchases of products subject to review. | |
|  | Appendix reference: |

1. Where possible, provide copies of price lists for the goods subject to review for the POI and MRP. Explain any changes to the price lists over the POI and MRP.

|  |  |
| --- | --- |
| *N/A –* no significant purchases of products subject to review. | |
|  | Appendix reference: |

# **SECTION E:** **Serious injury**

**The relevant annexes for this section are Annexes 9 and 10. In Section E information should be provided for each of your like or directly competitive goods.** Please substantiate all injury data with evidence.

The data requested in this section covers the POI and the MRP, as specified on the front page. The data for the POI will be used to make a recommendation on whether the existing safeguard measure should be transitioned. The data for the MRP will be used to make a recommendation on whether the existing safeguard measure should be extended.

## **E1 Serious injury**

This review will assess serious injury caused by increased imports of the goods subject to review if the safeguard measure were not transitioned. Serious injury means a significant overall impairment to your position or the threat of such impairment. Please provide comments in the boxes below and substantiate with evidence.

* + - 1. Is your business suffering from serious injury, i.e. (i) a significant overall impairment to your position, or (ii) the threat of such impairment? If so, please describe the nature and degree of the injury. This can relate to prices, volumes or profits associated with your production and sales of the like or directly competitive goods, or to wider aspects of your business. Please specify and substantiate your claims with evidence.

Note that if threat of such impairment has been alleged, we need to examine how imminent the threat of the situation is in developing into actual serious injury. Include why the threat of such impairment is clearly imminent.

|  |  |
| --- | --- |
| Capacity utilisation across all products remains underutilised verses the peak or verses potential. Employment figures have reduced over the years due to the business need to assess footprint and reduce costs as far as possible.  See UK Steel Response for sector view and further information. | |
|  | Appendix reference: |

* + - 1. Would your business suffer from serious injury if the existing safeguard measure on the goods subject to review were:

1. continued; or
2. discontinued.

If so, please describe the nature and the degree of the injury and provide supporting evidence.

|  |  |
| --- | --- |
| For each of the product categories relevant to British Steel, further injury over and above the current financial situation would be evident if the measures would be removed.  Please refer to UK Steel Response for further injury if the measures were to be removed. | |
|  | Appendix reference: |

* + - 1. If available, please submit any information concerning global export capacities, at this time and for the foreseeable future. Please also comment on the likelihood that this capacity will be exported to the UK. Please substantiate any claims with evidence.

|  |  |
| --- | --- |
| *N/A* | |
|  | Appendix reference: |

## **E2 Likelihood of serious injury**

This review will assess the likelihood of serious injury caused by increased imports of the goods subject to review if the existing safeguard measure were not extended. Please provide your comments in the boxes below and substantiate with evidence.

* + - * 1. Please explain whether there is a likelihood of recurrence of serious injury if the existing safeguard measure on the goods subject to review were:

1. continued; or
2. discontinued.

Provide supporting evidence to substantiate your claims.

|  |  |
| --- | --- |
| As per question in Section E1 – Q2.  If the UK has no measures in place, it becomes a highly attractive market for imports. The UK safeguard measures allow a level of protection to British Steel | |
|  | Appendix reference: |

## **E3 Production and production capacity**

Please provide the production volume, production capacity and capacity utilisation for each of the like or directly competitive goods produced by your company in **Annex 9 – Injury** for the POI and MRP. Describe the method used to calculate production capacity (e.g. number of shifts, working days per year, name plate versus actual capacity, idle time for machinery maintenance and changes in the production process etc.) and capacity utilisation.

|  |  |
| --- | --- |
| Production capacity has been assumed as nameplate capacity of each asset. | |
|  | Appendix reference: |

* + - * 1. Indicate what products are produced on the same equipment and whether production can be switched to other products.

|  |  |
| --- | --- |
| There are instances of flexibility across some sites. | |
|  | Appendix reference: |

* + - * 1. Please explain the allocation method used for production capacity and substantiate with evidence.

|  |  |
| --- | --- |
| Production capacity allocation is based on number of shifts per asset and best margin return as a priority. | |
|  | Appendix reference: |

* + - * 1. Please explain the cause(s) of any changes in your production volume, production capacity and capacity utilisation and substantiate with evidence.

|  |  |
| --- | --- |
| British Steel being a new company under new ownership, the footprint of the business has changed vs the POI and the first two months of MRP.  Production volumes have been restricted to manage market demand whilst managing costs of the business through the COVID-19 period. Skinningrove experienced furlough on two separate occasions and steel make was paired back. | |
|  | Appendix reference: |

* + - * 1. How would your production volume, production capacity and capacity utilisation for the like or directly competitive goods be affected if the existing safeguard measure on the goods subject to review were:

1. continued; or
2. discontinued.

Please describe the nature of any changes and substantiate with evidence.

|  |  |
| --- | --- |
| To remove the measures would put further pressure on the business and possibly lead to reduced overall volume production and make our investor very reluctant to invest over £1bn in the UK economy. | |
|  | Appendix reference: |

## 

## **E4 Employment**

Please provide the average number of employees in full-time equivalent roles (part-time employees should be included in the full-time equivalent) for each of the like or directly competitive goods in **Annex 9 – Injury** for the POI and MRP. This number should be broken down for the employees involved in the production, administration & management, and distribution & sales of the like or directly competitive goods. Please include contract labour (temporary workers).

Please also provide employment figures for your company as a whole.

Please provide annual median wage figures for all your company’s sites/facilities involved in the production of the like or directly competitive goods.

* 1. Please explain the allocation method used for employment and substantiate with evidence. Also specify how many of these employees work on other products if production is switched over.

|  |  |
| --- | --- |
| The average wage per employee has been provided by site in confidential version  Generally, there is very little crossover of employees between sites and production routes. | |
|  | Appendix reference: |

1. Please explain the cause(s) of any changes regarding the employment number and median wages and substantiate with evidence.

|  |  |
| --- | --- |
| Employment numbers have reduced as British Steel entered a period of liquidation in 2019. Some loss of personnel was natural waste, whilst some others were not recruited when British Steel was taken over on 09/03/2020. | |
|  | Appendix reference: |

1. How would your employment and wages be affected if the existing safeguard measure on the goods subject to review were:
2. continued; or
3. discontinued.

Please describe the nature of any changes and substantiate with evidence.

|  |  |
| --- | --- |
| If the measures were to be removed, further restructuring of the business may be necessary depending on the severity of the increased imports and loss of business to British Steel. | |
|  | Appendix reference: |

## **E5 Productivity**

Please provide the productivity for each of the like or directly competitive goods manufactured by your company in **Annex 9 – Injury** for the POI and MRP. This should be provided as the average output in volume per employee for the like or directly competitive goods.

Please explain the cause(s) of any changes and substantiate with evidence.

|  |  |
| --- | --- |
| See UK Steel Response to overall productivity changes in the sector. | |
|  | Appendix reference: |

* + - * 1. How would your productivity for the like or directly competitive goods be affected if the existing safeguard measure on the goods subject to review were:

1. continued; or
2. discontinued.

Please describe the nature of any changes and substantiate with evidence.

|  |  |
| --- | --- |
| Productivity would be reduced if the safeguards were to be removed. | |
|  | Appendix reference: |

## **E6 Profitability**

Please provide the profit before tax for sales for each of the like or directly competitive goods sold in the UK and the rest of the world in **Annex 9 – Injury** for the POI and MRP.

Specify how you have calculated profit. Please explain the allocation method used for profit and substantiate with evidence.

|  |  |
| --- | --- |
| This includes Fully Costed Material and transport costs plus selling expenses associated which the different types of material sold. | |
|  | Appendix reference: |

* 1. Please explain the cause(s) of any changes in the profitability of your like or directly competitive goods and substantiate with evidence.

|  |  |
| --- | --- |
| Over the period, British Steel has experienced numerous owners and there have been significant events contributing to the changes in profitability levels through what is typically a cyclical industry.  Further explanation disclosed in confidential version | |
|  | Appendix reference: |

* 1. How would your profitability of the like or directly competitive goods be affected if the existing safeguard measure on the goods subject to review were:

1. continued; or
2. discontinued.

Please describe the nature of any changes and substantiate with evidence.

|  |  |
| --- | --- |
| If the safeguards were to be removed, this would effect British Steel’s profitability and put at risk the current market prices. | |
|  | Appendix reference: |

* 1. For each like or directly competitive good, please provide what level of profit before tax, as a percentage of turnover, your company would expect to generate for sales in the UK only in the absence of the increase in imports and explain how you arrived at this figure.

|  |  |
| --- | --- |
| Percentage profit in the UK is linked to overall site production volumes, therefore profit margin in the UK is linked to sales into export territories.    British Steel has a heavy-end structure, need to consider as a total system perspective, the business cannot easily switch on / off the production levels – therefore the UK cannot be commented on in isolation. | |
|  | Appendix reference: |

## **E7 Return on investment (ROI)**

Please provide the return on investment (ROI) for each of the like or directly competitive goods in **Annex 9 – Injury** for the POI and MRP.

If you are unable to report ROI for the like or directly competitive goods only, please report ROI for the segment that contains the like or directly competitive goods, and if you are unable to do this, provide ROI for the total company. Provide an explanation and reasoning for this.

|  |  |
| --- | --- |
| ROI provided at company level. | |
|  | Appendix reference: |

* + 1. Please explain the method used to establish ROI of your like or directly competitive goods and substantiate with evidence.

|  |  |
| --- | --- |
| Gross profit as a percentage of total capex. All capex spend in recent years has been essential replacement. | |
|  | Appendix reference: |

* + 1. Please explain the cause(s) of any changes regarding the ROI of your like or directly competitive goods and substantiate with evidence.

|  |  |
| --- | --- |
| Given the majority of business capex is essential replacement or related to primary production, it is not possible to directly relate investment to returns. | |
|  | Appendix reference: |

1. How would your ROI for the like or directly competitive goods be affected if the existing safeguard measure on the goods subject to review were:
2. continued; or
3. discontinued.

Please describe the nature of any changes and substantiate with evidence.

|  |  |
| --- | --- |
| The ROI would be significantly worse if the safeguards were removed as the gross profit would be reduced as alternative sales in export markets, with higher costs to serve, would need to be considered. | |
|  | Appendix reference: |

## **E8 Investment and ability to raise capital**

Please explain in the box below how your company’s level of investment, ability to make investments and/or ability to raise capital have changed during the POI and MRP. Explain the allocation method used for investment. Describe the nature and cause of any changes and substantiate with supporting evidence, e.g. funding proposals, loan approvals or other relevant financial documentation.

|  |  |  |
| --- | --- | --- |
| Without external support, the company’s ability to invest is directly linked to its ability to generate free cashflow. | | |
|  | Appendix reference: |

* 1. How would your investment and ability to raise capital be affected if the existing safeguard measure on the goods subject to review were:

1. continued; or
2. discontinued.

Please describe the nature of any changes and substantiate with evidence.

|  |  |
| --- | --- |
| Removal of safeguards would impact EBITDA, thus reducing or removing any free cashflow for investment, which would hinder the long-term financial sustainability of the company. | |
|  | Appendix reference: |

## **E9 Stocks**

Please provide end of year stocks for each of the like or directly competitive goods manufactured by your company in **Annex 9 – Injury** for the POI and MRP.

|  |  |
| --- | --- |
| See Annex 9. | |
|  | Appendix reference: |

Please explain the cause(s) of any changes regarding the stocks and substantiate with evidence.

|  |  |
| --- | --- |
| Stock levels are always a business focus with regards to managing cash but maintaining sufficient levels to continue good service to the market. | |
|  | Appendix reference: |

* 1. How would your stocks of the like or directly competitive goods be affected if the existing safeguard measure on the goods subject to review were:

1. continued; or
2. discontinued.

Please describe the nature of any changes and substantiate with evidence.

|  |  |
| --- | --- |
| Stock levels would need to be readjusted in line with market and production levels. | |
|  | Appendix reference: |

## **E10 Cash flow**

1. Please provide the cash flow for each of the like or directly competitive goods in **Annex 10 – Cash flow** for the POI and MRP. Please explain the allocation method used for cash flow and substantiate with evidence.

|  |  |
| --- | --- |
| Cash flow provided at a company level – not possible to provide at a product group level. | |
|  | Appendix reference: |

1. Please explain the cause(s) of any changes regarding your cash flows and substantiate with evidence.

|  |  |
| --- | --- |
| Operating cashflow is driven by profitability measured by EBITDA and working capital movements. | |
|  | Appendix reference: |

1. Explain any variances between your actual and forecasted budgets over the POI and MRP, with reference to your cash flow from operating activities.

|  |  |
| --- | --- |
| Operating cashflow has been worse than budget | |
|  | Appendix reference: |

1. How would your cash flow for the like or directly competitive goods be affected if the existing safeguard measure on the goods subject to review were:
2. continued; or
3. discontinued.

Please describe the nature of any changes and substantiate with evidence.

|  |  |
| --- | --- |
| The removal of safeguards will limit accessible sales for British Steel and thereby impact profit, which will in turn impact cashflow | |
|  | Appendix reference: |

## **E11 Other factors**

In addition to the injury factors covered above, are there any other factors that show that an increase in imports of the goods subject to review has caused and/or is likely to cause serious injury to your company. Please provide the data/information here.

|  |  |
| --- | --- |
| Other factors adding to injury of the UK Steel sector include the higher priced electricity costs incurred by the UK verses other EU manufacturers. Costs are 60%-80% higher in some comparisons – this does not allow a level playing field and adds to the injury of the sector. | |
|  | Appendix reference: |

## **E12 Other questions**

1. Please describe, using evidence, how the injury and/or likely injury caused by an increase in imports is considered to be ‘serious’?

|  |  |  |
| --- | --- | --- |
| As previously referred to and as demonstrated in Annex 9 of the company profit (loss), it is evident of the serious injury and the further injury possible if the measures are removed. This would be considered as serious as it would constitute an overall impairment of British Steel’s operations and financial position. | | |
|  | Appendix reference: |

1. Please comment on the likelihood of trade diversion to the UK if the existing safeguard measure were to be removed due to similar measures applied on steel goods worldwide, e.g. the US Section 232 measures and the EU safeguard measure.

|  |  |
| --- | --- |
| Please refer to UK Steel Response. | |
|  | Appendix reference: |

1. Please comment on the future position of the UK industry if the existing safeguard measure were:
2. continued; or
3. discontinued.

Substantiate with evidence.

|  |  |
| --- | --- |
| Please refer to UK Steel Response | |
|  | Appendix reference: |

# **SECTION F:** **Causation**

This review must examine the causal link between the increase in imports and the serious injury, or likelihood of serious injury, suffered by the UK industry. Other factors other than trends in imports that may have caused or are likely to cause serious injury must also be examined.

## **F1 Link between serious injury and increase in imports**

1. Please comment on the link between the serious injury, or the threat of serious injury, suffered by the UK industry and the increase in imports into the UK and substantiate with evidence. The injury factors specified above can be used to explain the causal link. Please consider the following:

* Has the increase in imports caused serious injury to the industry, or threat of serious injury, and if so why? Why has the industry not been able to adjust to the increase?
* Have the imports coming into the UK been sold at prices lower than the like or directly competitive goods?
* Has price undercutting of the imported goods caused you to lower the prices of the like or directly competitive goods produced by your company?
* Has the lowering of prices for the like or directly competitive goods impacted other factors mentioned in the serious injury section such as production, market share, cash flow and investments? If so, how?
* If the industry is benefitting from existing anti-dumping or countervailing duties on specific products, how has the increase in imports developed given the existence of duties?

|  |  |
| --- | --- |
| Increased import levels in a mature market, such as the UK, cause injury to the UK steel sector. There is a limited market demand, hence the impact of increased imports reduces the market share of domestic manufacturers, such as British Steel. | |
|  | Appendix reference: |

1. How would the cause(s) or degree of serious injury change if the existing safeguard measure on the goods subject to review were:
2. continued; or
3. discontinued.

Please describe the nature of any change and substantiate your claims with evidence.

|  |  |
| --- | --- |
| Injury to British Steel and UK producers would significantly increase if safeguard measures were removed. | |
|  | Appendix reference: |

## **F2 Other causation factors**

* + - 1. Please comment and substantiate with evidence on other factors, separate from the increase in imports, that may have caused serious injury or threaten to cause serious injury to the UK industry. This may include:
* UK demand for the like or directly competitive goods;
* the overall situation on the world market of the like or directly competitive goods and the demand for exports towards third countries;
* the competitiveness of your company (including quality, efficiency and performances of your production lines) with respect to competitors;
* the reasons and consequences of any reductions in your exports to other markets.

This list is non-exhaustive. Please add any additional information explaining the current state of the UK industry.

|  |  |
| --- | --- |
| Injury is largely caused by import levels which are related to a number of other factors such as global overcapacity within the steel sector, S232, increased protectionism and more recently the impact of COVID-19 and uncertainties surrounding Brexit. | |
|  | Appendix reference: |

# **SECTION G:** **Adjustment plan**

To implement a safeguard measure, UK producers are required to submit an adjustment plan. The adjustment plan should set out how UK producers of the like or directly competitive goods intend to adjust to the importation of goods in increased quantities. Support the adjustment plan with evidence. Please contact the case team if you would like to take an alternative approach, e.g. an industry-wide plan.

An adjustment plan should set out the following:

1. How you intend to adjust to the importation of the goods subject to review in increased quantities.
2. Potential innovation, research and development initiatives to improve the competitiveness of your company.
3. Changes intended to improve efficiency, including workforce effectiveness and investing in new or different machinery.

## **G1 Your company adjustment plan**

Please explain your company’s adjustment strategy in response to the increase in imports since the implementation of the EU safeguard measure on steel products. In your answer, please refer to:

* what you intended to do to adjust to the importation of the goods subject to review in increased quantities and why these specific factors have been chosen;
* the actions that you planned to take in order to achieve the intended changes to adjust to the importation of the goods subject to review in increased quantities; and
* the timeframe for completing the actions.

The actions presented in the adjustment plan should cover, but are not limited to:

* changes to selling prices and/or volumes; and
* changes to costs, such as direct material costs, labour costs and manufacturing overheads (indirect expenses).

|  |  |
| --- | --- |
| The EU safeguard measures were introduced and intended to keep import levels at the average of 2015 to 2017. The percentage adjustment to the base levels set of 11% over the 3 years have not been reflected in UK market size increases to this level.  British Steel will continue to demonstrate contribution to the local and national economy from an economic, social and environmental perspective. British Steel has over the POI and MRP, and continues to demonstrate consistent adjustment in a number of ways, such as changing business footprint, adjustments to volume production and outputs as required, cuts to cost base, carbon footprint investments.  The uncertainties surrounding the liquidation of British Steel, ongoing uncertainties on trade between the UK and EU and the COVID-19 pandemic, have all centred on adjustments to maintain a strong emphasis on Health & Safety as well as re-establishing the business under new ownership. | |
|  | Appendix reference: |

Please explain how and when the actions described in question G1.1 (above) have been completed. Indicate whether and how these actions have affected:

* selling prices and/or volumes; and
* costs, such as direct material costs, labour costs and manufacturing overheads (indirect expenses).

If you have been unable to complete any of the actions from your initial plan, please explain the reasoning for this and the impact this has had on the adjustment of your business.

|  |  |
| --- | --- |
| All of the adjustments referred to in the previous section are ongoing and are considered on a daily basis to help the business towards sustainability. External factors in Automotive supply chains, Brexit and COVID-19 have been challenging to deal with and have impacted demand.  The continued safeguard measures will help to minimise import surges to the UK market which will cause further disruption. The ongoing overcapacity issues and sector changes regarding sustainability will mean increased pressure on improvements and adjustment activities for British Steel. | |
|  | Appendix reference: |

Please explain your company’s adjustment strategy to the increase in imports if the implementation of the safeguard measure is extended. In your answer, please refer to:

* what you intend to do to adjust to the importation of the goods subject to review in increased quantities and why these specific factors have been chosen;
* the actions that you plan to take in order to achieve the intended changes to adjust to the importation of the goods subject to review in increased quantities; and
* the timeframe for completing the actions.

The actions presented in the adjustment plan should cover, but are not limited to:

* changes to selling prices and/or volumes; and
* changes to costs, such as direct material costs, labour costs and manufacturing overheads (indirect expenses).

Where possible, please provide evidence, including from past experience where possible, of how the adjustment plan can be delivered given the nature of your business, the competitive environment and the expected timeframe for completion. If you have previously made similar adjustments to your business, such as cutting costs, this would be suitable to evidence whether the actions set out in the plan can be reasonably achieved.

|  |  |
| --- | --- |
| Whilst so much uncertainty and global overcapacity remains, the UK safeguard measures are essential to UK producers. The adjustment and continuous business changes can only be implemented if the UK safeguard measures are extended to provide a level of certainty that UK markets will not be subject to import surges and price disruption. | |
|  | Appendix reference: |

# **SECTION H:** **Economic interest**

## **H1 UK economic interest**

The Economic Interest Test assesses the economic impact of a measure compared to what would happen if it was not maintained. There are six factors which TRID must consider as part of the economic interest test:

1. The serious injury caused by the importation of goods in increased quantities to UK producers of those goods and the benefits to that industry in removing the injury.
2. The economic significance of affected industries and consumers in the UK.
3. The likely impact on affected industries and consumers in the UK.
4. The likely impact on particular geographic areas, or particular groups, in the UK.
5. The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
6. Other matters that TRID consider relevant.

The questions in this section will contribute to this assessment. **For questions in this section please provide information broken down by each of your company’s sites/facilities, where relevant and possible. The data should cover January 2019 – June 2020 to allow for an assessment of the current economic situation and how it may develop.**

Please provide an overview of your supply chain for the like or directly competitive goods, from raw materials through to final customers. Where possible, please describe the number, location and size of companies at each stage.

|  |  |
| --- | --- |
| * Raw Materials purchased * Raw Materials Preparation * Blast Furnaces * Steelworks * Mills convert semi into finished products   + Scunthorpe Rail & Section Mill – Rail and Sections,   + Scunthorpe Rod Mill – As-rolled Wire Rod   + Teesside Beam Mill - Sections   + Skinningrove – Special Profiles * Finished products stocked / despatched to customers | |
|  | Appendix reference: |

1. Please provide a breakdown by location for the employment figures provided in **Section E**. How would employment figures in certain locations be affected if the existing safeguard measure on the goods subject to review were:
2. continued; or
3. discontinued.

Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years and explain the method used to calculate them.

|  |  |
| --- | --- |
| Employment figures disclosed in confidential version by location  A removal of the safeguard measures will impact employment figures. Due to import increases, there will be less demand for British Steel produce in markets which are at reduced levels. These impacts would be significant to local communities as these jobs are in areas of economic deprivation and there are little or no alternative employment opportunities.  Not only would these numbers be directly affected but for every one British Steel employee, this impacts the supply chain and community by up to four indirect jobs – having a much deeper impact to the community and the economy.  These have been key reasons for the UK Government to continue British Steel trading with the ongoing assistance to find a new owner to protect this employment. | |
|  | Appendix reference: |

1. Please provide a breakdown by location for the wages provided in **Section E**. If you are unable to provide median wages, please provide mean wages. How would wages in certain locations be affected if the existing safeguard measure on the goods subject to review were:
2. continued; or
3. discontinued.

Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years and explain the method used to calculate them.

|  |  |
| --- | --- |
| Average wages disclosed in confidential version  As highlighted in the previous answer, removal of the safeguard measures would impact employment and the average wage in already deprived areas. This has been evidenced historically in areas such as Teesside with the closure of the SSI steelworks and former mills. | |
|  | Appendix reference: |

1. If known, what fraction of domestic demand for the like or directly competitive goods (by volume) does your company supply? How would your market share be affected if the existing safeguard measure were:
2. continued; or
3. discontinued.

Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years and explain the method used to calculate them.

|  |  |
| --- | --- |
| British Steel market share would be impacted significantly if the safeguard measures were to be removed, in particular for two products produced by British Steel: | |
|  | Appendix reference: |

1. Please comment on how significant production of the like or directly competitive goods is in relation to your company’s entire UK production.

|  |  |
| --- | --- |
| It is critical to maintain the highest domestic share possible. | |
|  | Appendix reference: |

1. Please comment on any related industries that might be affected if the existing safeguard measure on the goods subject to review were to be removed. Please consider in particular:

* upstream industries – those who produce inputs needed for the like or directly competitive goods and/or goods subject to review; and
* downstream industries – those who purchase the like or directly competitive goods and/or goods subject to review.

|  |  |
| --- | --- |
| **Upstream** – local supply chains providing raw materials and services to British Steel would be significantly impacted by any reduction or further deterioration to the business footprint.  **Downstream** – key UK consumers of British Steel products may be impacted significantly if the measures were removed and if British Steel was no longer a viable business. Key infrastructure products, such as Rail and Sections where British Steel is the only UK producer, would be reliant on importers which would impact availability and cash flow. The loss of the UK steel industry as a foundation sector also has detrimental impact to the contribution of the UK economy. | |
|  | Appendix reference: |

1. Would any other industries would be affected if the existing safeguard measure on the goods subject to review were:
2. continued; or
3. discontinued.

Please substantiate your claims with evidence.

|  |  |
| --- | --- |
| If the safeguard measures are discontinued and the UK becomes a dumping ground for imports, Network Rail would be negatively impacted if British Steel no longer existed to produce rail. As the UK network provider, Network Rail would then be totally reliant on European / other suppliers.  Currently, British Steel demonstrates spare. Market demand is depressed, and the current quota levels still allow for higher than historic import levels.  The UK Construction sector would also be impacted if British Steel no longer exists as they too would be reliant on imports which would impact availability and cashflow if there was no domestic producer. | |
|  | Appendix reference: |

1. Please comment on which other markets or products would be affected if the existing safeguard measure on the goods subject to review were:
2. continued; or
3. discontinued.

This could include substitute products (such as margarine for butter) or complementary products (such as printers and ink). Please substantiate your claims with evidence.

|  |  |
| --- | --- |
| Other markets or products would not be impacted. | |
|  | Appendix reference: |

1. Please describe how you would expect the following to be affected if the existing safeguard measure on the goods subject to review were (i) continued or (ii) discontinued:
2. market price of the like or directly competitive goods in the UK; and
3. total UK output of the like or directly competitive goods.

Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years to support your claims.

|  |  |
| --- | --- |
| 1. If the measures were not to be continued, UK market prices would reduce as the UK would be a key target for importers. Reduction in prices when raw material prices remain consistently high would have a severe impact on steel producers. Generally, in all supply chains, steel is a small proportion of the customers’ business. Therefore, benefits to them would be far outweighed by the negative impact on steel producers. 2. Total UK output of the products under review would reduce if imports were to increase. UK steel producers would be under significant pressure to reduce output and in some cases, consider the closure of mills / sites where they are no longer viable in a reduced output scenario. | |
|  | Appendix reference: |

1. Please describe how you would expect the following to be affected if the existing safeguard measure on the goods subject to review were (i) continued or (ii) discontinued:
2. total imports of the goods subject to review to the UK; and
3. total exports from the UK.

Where possible, please provide estimates (e.g. projections or forecasts) for both scenarios for the next three years to support your claims.

|  |  |
| --- | --- |
| 1. Imports into the UK would increase if the measures were removed. The UK market would be subject to import surges, therefore UK producer share would be reduced, and domestic sales impacted. 2. If the measures were removed and domestic sales reduced, UK steel producers would look to alternative markets to best utilise mill capacities. UK exports would increase, but profit margins would be reduced, negatively impacting British Steel’s financial results.   Please also refer to UK Steel Response | |
|  | Appendix reference: |

1. To what extent would you expect any increase in costs for the goods subject to review to be passed onto end users? Please support your answer with evidence.

|  |  |
| --- | --- |
| Increased costs passed onto end-users very much depends on market circumstances | |
|  | Appendix reference: |

1. How would plans for future UK investment or expansion be affected if the existing safeguard measure of the goods subject to review were:
2. continued; or
3. discontinued.

If so, please provide detail by location with supporting evidence.

|  |  |
| --- | --- |
| If the safeguard measures are removed or are not strengthened, this would impact on the commercial cases to support investment plans. | |
|  | Appendix reference: |

1. As a public body, TRID has an obligation under the *Equality Act 2010* to ensure that the possible effects of its activities on different people are considered. This Public Sector Equality Duty covers the following protected characteristics:

* age,
* disability,
* gender reassignment,
* marriage or civil partnership,
* pregnancy and maternity,
* race,
* religion or belief,
* sex, and
* sexual orientation.

If you have any information that could assist us in our consideration of whether the continuation of the existing safeguard measure might disproportionately affect any of these groups, please provide it in the box below.

|  |  |
| --- | --- |
| N/A – no reason why the safeguard measures would impact or disproportionally affect. | |
|  | Appendix reference: |

1. In terms of the competitive environment and structure of markets for goods in the UK, please answer the following questions in relation to how the continuation of the existing safeguard measure could impact:
2. the number and range of suppliers of like or directly competitive goods and/or goods subject to review;
3. the ability of suppliers of like or directly competitive goods and/or goods subject to review to compete;
4. the incentives for suppliers of like or directly competitive goods and/or goods subject to review to compete vigorously; and
5. the choices and information available to UK consumers?

Specify by relevant product categories. Please provide evidence to support your answer.

|  |  |
| --- | --- |
| With the exception of Wire Rod products, British Steel is the only UK producer of other products subject to review. Due to the UK market’s demand of products, it would not be viable for multiple UK steel producers of the products. Therefore we need to continue the measures to protect the UK manufacturing steel sector. | |
|  | Appendix reference: |

1. Please describe the nature and degree of any regional impacts that you would expect if the existing safeguard measure on the goods subject to review were:
2. continued; or
3. discontinued.

Please substantiate your claims with evidence.

|  |  |
| --- | --- |
| If the safeguard measures were to be removed, the impact to employment levels and wages in Scunthorpe, Teesside and Skinningrove would be put at risk. The economic deprivation if jobs were to be lost would have dramatic impact in the areas reliant on British Steel employment. | |
|  | Appendix reference: |

1. If there are any additional economic factors that you consider to be relevant for the Economic Interest Test in this review, please provide details here and any supporting evidence.

|  |  |
| --- | --- |
| Economic assessments should also take into consideration UK content for Public Procurement, supporting UK manufacturers to keep money in the UK. UK steel producers have a competitive offer, and this should be a responsibility of UK Government to protect the UK economy.   * For every 1,000 tonnes of steel, 10 UK jobs are created and protected * 31,900 people are **directly** employed in the UK steel sector with an additional 52,300 further jobs supported in supply chains and local communities * The UK Steel industry **directly** contributes £1.6bn to the UK economy, with an additional £3.9m contribution created in supply chains and local communities | |
|  | Appendix reference: |

# **SECTION I:** **Next steps and declaration**

## **Next steps**

Once you have completed all parts of the questionnaire, the declaration below should be signed by an authorised signatory.

The questionnaire, spreadsheet annex and any appendices should be submitted through the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by 28 November 2020. The checklist in Section J of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire and related annex must be submitted. You can find guidance on how to complete confidential and non-confidential versions at <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information>.

## **Declaration**

By signing this declaration, you agree that all information supplied in this questionnaire is complete and correct to the best of your knowledge and belief and understand that the information submitted may be subject to authentication by TRID.

Internal registration number:

Company name:

|  |  |  |
| --- | --- | --- |
|  |  |  |
| Date |  | Signature of authorised signatory |
|  |  |  |
| Company stamp |  | Name and title of authorised signatory |

# **SECTION J:** **Checklist and appendices**

This section is an aid to ensure that you have completed all sections of this questionnaire.

|  |  |
| --- | --- |
| **Section** | Please tick if you have responded to all questions |
| Section A – Company structure and operations | ✓ |
| Section B – Goods | ✓ |
| Section C – Increase in imports | ✓ |
| Section D – Costs and sales | ✓ |
| Section E – Serious injury | ✓ |
| Section F – Causation | ✓ |
| Section G – Adjustment plan | ✓ |
| Section H – Economic interest | ✓ |
| Section I – Next steps and declaration | ✓ |

Please list any appendices that you have referenced throughout and are attaching along with this questionnaire.

|  |  |
| --- | --- |
| **Appendix reference** | **Document title** |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |

+Add additional rows as required

1. Please note that the list uses the same category numbers and category names as EU Regulation 2019/159 for those goods subject to review within this Transition Review. Product categories 3, 8, 9, 10, 18, 22, and 24, will not be transitioned and are therefore excluded from the list. [↑](#footnote-ref-2)