



Register as an Interested Party

Reconsideration of an original decision in Transition Review

No. TF0006: Safeguard measures on certain steel products

Period of Investigation:	2013-2017
Most Recent Period (MRP):	1 st January 2018 to 30 th June 2020
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When you have completed this form, indicate the **confidentiality** of this document by placing an X in the relevant box below:

Confidential

Non-confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **confidential** and a **non-confidential version**. Both copies should be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk).



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Instructions

I – Note about confidentiality

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

Please ensure that each page of information you provide is clearly marked either “confidential” or “non-confidential” in the header. It is your responsibility to ensure that the non-confidential version does not contain any confidential information. Note that ‘confidential information’ in this context includes any personal details that can be attached to a named individual. This includes names, contact details and signatures, none of which should be included in the non-confidential version.

See <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information> for further information on what can be considered confidential and how to prepare a non-confidential version of this document.

All information provided to the Trade Remedies Authority (TRA) in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on <https://www.trade-remedies.service.gov.uk/public/case/TF0006/>



Section A – Your organisation’s interest in the case

To register your organisation’s interest in this case, please complete the text boxes below. For a definition of the goods to which this reconsideration relates (“the goods”) see the [Reconsideration’s Notice of Initiation](#).

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

Acciaierie Valbruna SpA is an Italian manufacturer and exporter to the UK of the goods falling under Product Category 14 – Stainless Steel Bars and Light Sections (Heading 7222) and Product Category 15 – Stainless Steel Wire Rod (Heading 7221)

2. Please describe your interest in this case:

Acciaierie Valbruna wishes to participate in the reconsideration procedure of the original decision in Transition Review No. TF0006 (the “Reconsideration”) as an interested party. Acciaierie Valbruna’s interest arises from the fact that, according to Appendix I to the Notice of Initiation, the Reconsideration will also cover the goods falling under product category 14.

In this regard, it should be recalled that in its final Recommendation dated 3 June 2021 the TRA recommended to the Secretary of State to revoke the safeguard measures imposed on product category 14 on the ground that no increase of imports in absolute or relative terms took place in the UK. In line with this recommendation, the Secretary of State revoked the safeguard measures imposed on product category 14 as of 1 July 2021.

Being an exporting producer of goods falling under product category 14 Acciaierie Valbruna aims at maintaining free access to the UK market and the possibility to keep supplying its UK customers. The re-imposition of safeguard measures on product category 14 would significantly disrupt the operations of many steel exporters and importers, including but not limited to Acciaierie Valbruna and its related company, Valbruna UK Ltd.



Section B – Additional information

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

This may include:

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

In the framework of Transition Review No. TF0006 the TRA concluded in the final Recommendation to the Secretary of State that no increase of imports in absolute or relative terms took place in the UK during the POI as far as product category 14 is concerned. Moreover, the available trade statistics show that also during the MRP the imports of product category 14 did not increase in absolute or relative terms. This simple finding would be sufficient to immediately terminate the Reconsideration as far as product category 14 is concerned, since the substantive requirement to impose safeguard measures pursuant to the WTO Agreement on Safeguards is lacking in the present case.

The above said, it should also be noted that the imposition of safeguard measures on product category 14 would be clearly against the economic interest of the UK.

In this regard, it should be recalled that in the framework of Transition Review No. TF0006 Acciaierie Valbruna repeatedly explained that the UK production of goods falling under product category 14 is limited and thus insufficient to meet the UK demand (see, *inter alia*, response to Questions B1 and B2 of the exporter questionnaire) [**Limited – sales information is confidential and is not susceptible of summary**]. Acciaierie Valbruna provided detailed information concerning the (few) commodity codes that can be manufactured by the only UK producer of the goods falling under product category 14, namely “Outokumpu Sheffield Stainless Rod & Bar” (please refer to response B1 of the exporter questionnaire) and substantiated its claims with extensive evidence (see, *inter alia*, Appendices 8 and 9 to the exporter questionnaire).

It follows that Acciaierie Valbruna already demonstrated – without being contradicted by other interested parties - that the UK production of the goods falling under product category 14 is limited to small diameters and therefore does not cover the full product range. Moreover, Acciaierie Valbruna demonstrated that also the UK production of small diameters is insufficient to meet the UK demand. As a matter of fact, the imposition of safeguard measures on product category 14 would likely cause serious disruptions in the supply chain given the insufficient production volumes of the only UK manufacturer.



Acciaierie Valbruna respectfully submits that the above considerations call for the immediate termination of the Reconsideration, as far as product category 14 is concerned.

Acciaierie Valbruna reserves the right to file additional comments and observations once all the non-confidential version of the applications for reconsideration filed by the domestic producers will be made available in the public file.