



## 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<sup>st</sup> January 2018 to 30<sup>th</sup> June 2020

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Completed on behalf of:

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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

**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 the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).



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## Instructions

### I – Note about confidentiality

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

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

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

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



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

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

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

Valbruna UK Ltd. is involved in the importation, stockholding, and distribution in the UK market since 1986 of the goods falling under product category 14 – Stainless steel bars and light sections manufactured by its parent company Acciaierie Valbruna SpA.

In addition to importing goods classified under product category 14 into the UK, Valbruna UK Ltd. also performs minor finishing operations such as (i) **[LIMITED – Strategic business information]** and (ii) **[LIMITED – Strategic business information]**.

2. Please describe your interest in this case:

Valbruna UK Ltd. wishes to participate in the reconsideration procedure of the original decision in Transition Review No. TF0006 (the “Reconsideration”) as an interested party. Valbruna UK Ltd.’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 a UK-based importer of the goods falling under product category 14, Valbruna UK Ltd. aims at securing unrestricted opportunities to continue importing into the UK stainless steel bars and light sections manufactured in Italy by its parent company, Acciaierie Valbruna SpA, with a view to keep supplying its UK customers active in strategic industries, including - but not limited to - aerospace, defence, automotive, oil & gas, medicine. 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 Valbruna UK Ltd. and its parent company, Acciaierie Valbruna SpA.



## 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 Valbruna UK Ltd. 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*, the Product Scope Submission of 17 November 2020). Valbruna UK Ltd. 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” and substantiated its claims with extensive evidence (see, *inter alia*, Appendices 10 and 11 to the importer questionnaire).

It follows that Valbruna UK Ltd. 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, Valbruna UK Ltd. 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.



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

Valbruna UK Ltd. 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.