

Subsidy Transition Review Questionnaire (Producer)

Case TS0018: Hot Rolled Flat and Coil Products exported from The People’s Republic of China

Period of Investigation (POI):	1 April 2021 – 31 March 2022
Injury period:	1 April 2018 – 31 March 2022
Deadline for response:	4 July 2022
Contact details:	TS0018@traderemedies.gov.uk
Completed on behalf of:	Liberty Steel UK

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

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 4 July 2022.

Contents

Introduction.....	1
About us, this case and this questionnaire.....	1
Instructions on completing this questionnaire	2
Preparing confidential and non-confidential versions.....	3
Providing information from subsidiaries or associated parties.....	4
What happens next.....	4
Verifying the information you supply	5
The scope of this review.....	6
Goods subject to review	6
Like goods.....	6
SECTION A: Company structure and operations.....	9
A1Identity and contact details	9
A2About your company	10
A3Organisational structure	11
A4Understanding the UK market	11
A5Board members and principal shareholders	14
A5Operational links with other companies or persons	15
A6Accounting practices	15
SECTION B: About your goods.....	18
B1Understanding your like goods	18
SECTION C: Costs and production.....	19
C1Cost to make and sell	19
C2Cost and sales reconciliation.....	19
C3Production process	19
C4Raw material (RM) and major input purchases	20
C5 Purchases of like goods and/or goods subject to review	20
SECTION D: Sales.....	22
D1 – Domestic sales.....	22
D2 Sales reconciliation	22
D3 Distribution channels and price setting.....	22
D4Captive use.....	24
SECTION E: Injury to your company	25
SECTION F: Subsidies.....	30
F1General	30
F2Subsidies.....	31
SECTION G: Supplementary Questions	31
G1 Economic interest	31
G2 Background	31

G3 Your company 32
G4 Potential impacts of a measure 33
SECTION H: 37
Checklist and appendices 37

Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

As part of our work, we are carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) has decided to maintain after EU exit.

This transition review will consider whether subsidised imports of Hot Rolled Flat and Coil products from the People's Republic of China are likely to continue or recur if the measure was removed and whether injury would be likely to continue or recur to the UK industry if this measure was removed.

Why should I take part?

We are asking domestic producers of Hot Rolled Flat and Coil products to complete this questionnaire to inform our review of whether the current countervailing measure should be maintained, varied or revoked.

The information your company provides will help us to reach a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by 4 July 2022. 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. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at TS0018@traderemedies.gov.uk.

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under the *Taxation (Cross-border Trade) Act 2018*.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able 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 you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annexes and any calculations you 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 a question is "zero", "no" or "none", please write this.
- Please complete the spreadsheet 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 your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as 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).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods (e.g., 1 January – 31 March, 1 April – 30 June, etc).
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g., do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g., '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (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, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, TS0018, in any correspondence with the TRA.

Preparing confidential and non-confidential versions

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. This is so that we can publish the non-confidential version of your information on our public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential (e.g., the data is commercially sensitive).
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.

- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

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

Providing information from subsidiaries or associated parties

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 involved in the import, production, sale, R&D, distribution and/or supply of the like good and/or goods subject to review.

Please note, both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [Regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

- If any of your subsidiaries or associated companies are also a UK producer of like goods, they should **also** complete a Producer questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like 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

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload confidential and non-confidential versions through our [Trade Remedies Service](#). Following this:

- you will receive an email confirming the documents have been uploaded successfully
- the Case Team will contact you if further information is required
- the non-confidential responses will be placed on the public file; and

- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, the Case Team will contact you to arrange this.

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.

Please keep a record of formulas and steps used in your calculations and other related material/documentation as it may be asked for during verification.

In some circumstances verification visits may be conducted remotely.

Please indicate any dates when you would be unable to host a verification visit.

Please answer here

Appendix reference:

Once verification is complete, the TRA will prepare a report and share a draft with you. The TRA will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.

The scope of this review

Goods subject to review

This review covers certain hot-rolled flat products of iron, non-alloy or other alloy steel exported from the People's Republic of China, described as:

Certain flat-rolled products of iron, non-alloy steel or other alloy steel, whether or not in coils (including 'cut-to-length' and 'narrow strip' products), not further worked than hot-rolled, not clad, plated or coated.

The following product types are excluded: Products of stainless steel and grain-oriented silicon electrical steel; products of tool steel and high-speed steel; products, not in coils, without patterns in relief, of a thickness exceeding 10mm and of a width of 600mm or more; products, not in coils, without patterns in relief, of a thickness of 4.75mm or more but not exceeding 10mm and of a width of 2.05m or more.

These products are currently classifiable within the following CN code(s):

72 08 10 00 00	72 25 40 60 90	72 08 38 00 10	72 11 14 00 10
72 08 40 00 00	72 08 36 00 00	72 08 38 00 90	72 11 14 00 90
72 11 19 00 10	72 08 53 90 00	72 08 39 00 10	72 26 91 99 00
72 08 26 00 00	72 25 40 90 00	72 08 39 00 90	72 11 19 00 90
72 08 52 99 00	72 08 37 00 10	72 26 91 91 00	72 08 25 00 00
72 25 30 90 00	72 08 37 00 90	72 08 40 00 90	72 08 52 10 00
72 08 27 00 00	72 08 54 00 00	72 11 13 00 00	72 25 19 10 90
72 08 53 10 00	72 26 19 10 90		

The commodity code 72 26 19 10 90 was replaced by commodity codes 72 26 19 10 91 and 72 26 19 10 95 on 9 July 2021.

These codes are only given for information.

In this questionnaire, these goods will be referred to as '**the goods subject to review**'. Any reference to 'goods subject to review' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

This questionnaire asks for information about your company's production and sales of goods which are **like** the goods subject to review. Any reference to '**like goods**' in this questionnaire refers to goods produced in the UK or imported to the UK from a country

other than the People's Republic of China which are like the goods subject to review in all respects, or with characteristics closely resembling them.

Please follow the instructions for each question to provide the appropriate information regarding the like goods or goods subject to review.

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:	Liberty House Group	
Legal structure (e.g., limited company, sole trader, partnership etc):	Private Limited Company	
Year of establishment:	2016	
Other operating names:	None	
Company registration number:		
Place of registration:	United Kingdom	
Name (point of contact):		
Position:		
Address:		
Telephone No:		
Email:		
Website:	https://libertysteelgroup.com	

2. If you have appointed an external party to act on your behalf in this review, please provide their details and attach a letter confirming the TRA should contact them directly:

Name:	Not Applicable
Address:	
Telephone No.:	
Email:	
Confirm they have signed authority to act (Yes/No):	
Appendix reference:	

A2 About your company

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

Producer
Appendix reference:

2. 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
NA		

+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the like goods. These may include licences, permits, permissions or mining concessions. Indicate if your company is subject to any direct or indirect, quantitative, or other, restrictions on any of these activities.

NA
Appendix reference:

4. List all international production standards (BS / EN etc) your company currently conforms to, for the like good.

BS EN ISO 9001, BS EN ISO 14001, BS EN 10025, EN 10204:2004
Appendix reference:

5. Please describe all the other products (not including the like goods) produced or sold by your company in the UK.

Bar, Rebar, Billet, Bloom, Ingot, Cold Rolled Strip, Plate, Pipe, Sections, Powder Metals
Appendix reference:

6. State whether your company is a member of any representative organisations (e.g., trade bodies, associations, Chambers of Commerce). If so, provide a copy of the relevant documentation.

UK Steel

Appendix reference:

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g., companies) are associated where they meet the definition of 'Related Persons' in Regulation 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, all sites/locations and departments which are involved in the production, sales, R&D, supply and distribution of the like goods for domestic and export markets.

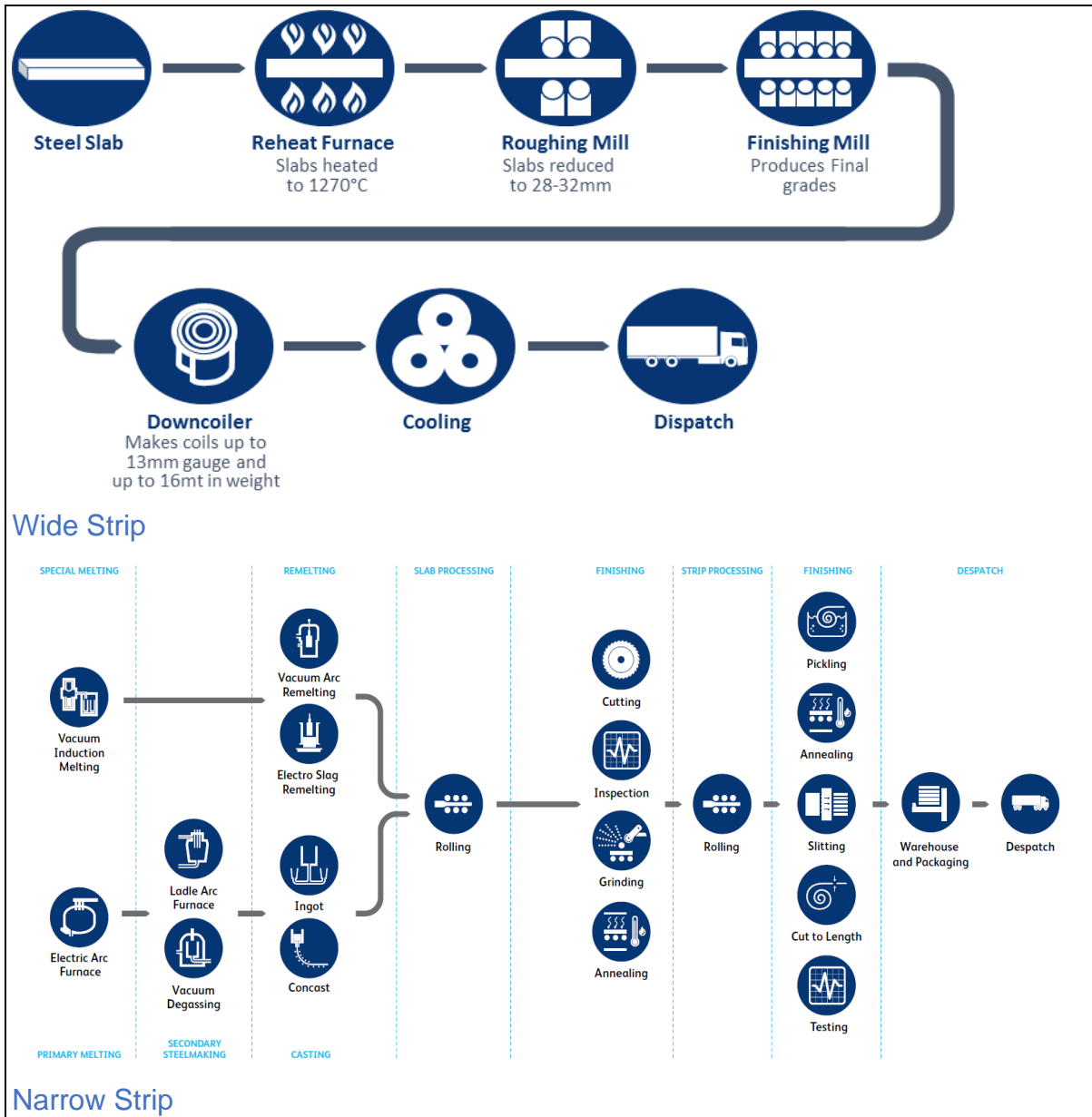
Appendix reference:

2. Please provide a written summary and a diagram/flow chart, if available, of your production process for the like goods that you produce in the UK. Clearly indicate the different production stages carried out by your company.

Wide strip: steel slab is reheated then reduced to size using a roughing mill and finishing mill. The product is then coiled and cooled prior to despatch.

Narrow Strip: raw materials are sourced from within Liberty Steel UK in the form of slab. EAF Steel is melted and cast at the Rotherham plant, then rolled into slab at the Stocksbridge plant.: Slabs are reheated and rolled to size. They are then inspected and finished according to customer requirements, prior to despatch.

See diagrams below.



Appendix reference:

3. Please complete **Annex 1 – Associated companies** for your company’s worldwide corporate structure and affiliations.

LIBERTY is a global steel and mining business with a rolling capacity of over 20 million tonnes per annum (mtpa), a liquid steel capacity of over 14mtpa and has around 30,000 employees and contractors based in more than 200 locations worldwide.

Liberty has associated companies in the following regions:

- LIBERTY Steel United Kingdom
- LIBERTY Steel Continental Europe
- LIBERTY Steel USA
- LIBERTY Steel Australia

LIBERTY is part of GFG Alliance, a collection of global businesses and investments focused on the metals and renewable energy sectors owned by Sanjeev Gupta and his immediate family.

GFG ALLIANCE STRUCTURE AND OPERATING MODEL:



A4 Understanding the UK market

1. Please explain the end use of the goods subject to review and the like goods. If there are multiple uses for the like goods, list them and, where possible, estimate what proportion of your sales goes to each.

Construction, Automotive, Pipes & Tubes, Structural Hollow Sections, Highway, Yellow Goods, Materials Handling, Power, Agriculture

Appendix reference:

2. Provide a general description of the nature of competition within the overall_UK market for the goods subject to review and the like goods.

Appendix reference:

3. How price-sensitive is demand for the goods subject to review and like good? In other words, to what extent will the overall demand for Hot Rolled Flat and Coil products change in response to changes in price?

HRC currently a very volatile market, with UK slab prices, not low enough to make the slab rerolling viable against current import prices, currency changes also influence pricing levels, and will slow demand down.

Appendix reference:

4. Do consumers buy from the cheapest producer, or are there other factors that influence their decision such as quality and service?

Customer ultimately will buy based on price, to maximise profits, if UK markets cannot compete due higher costs etc. the UK will begin to suffer with cheaper imports, which may not have the best quality.

Appendix reference:

5. To what extent is it feasible for producers to change their level of production in response to changing market conditions such as increases in prices?

Producers should have the ability to add or withdraw capacity based on demand. But under normal circumstances this is not a “we can roll another 10k next week scenario” this will take some planning and organisation.

Appendix reference:

6. Provide a general description of the trends and drivers of demand within the UK market for the goods subject to review and the like goods, including causes of demand fluctuations and any factors contributing to overall market growth or decline.

Trends affecting drivers for the demand within the UK are Automotive demands along with first and second tier processors, holiday shut down periods will also affect demand, fluctuation will also happen when we begin to see import price for the following periods show a decline, people become reluctant to buy.

Currency fluctuations allowing cheaper imports also affect supply.

Appendix reference:

7. What are the major distribution and marketing channels within the UK market for the goods subject to review and the like goods?

Major distribution routes and Marketing routes for the said material would be via traders and via the mills direct. This again is marketed via the UK trader.

Appendix reference:

8. Who are the general users/consumers/customers within the UK market for the goods subject to review and the like goods?

General users would be tube manufacturers, laser profilers, hollow sections decoiled sheets, spiral tube , general fabrication , storage tanks , automotive pressed part.

Appendix reference:

9. Do the goods subject to review and like goods compete directly with one another?

Yes the good would directly compete – unless a specification is not made directly.

Appendix reference:

10. Provide a general description of any government regulations or tax incentives affecting the production or sale of the goods subject to review and the like goods.

Appendix reference:

11. Provide a general description of developments in technology affecting the characteristics, demand or the production process of the goods subject to review and the like goods.

Appendix reference:

12. Are there any goods which could be substituted for the goods subject to review and the like goods?

Appendix reference:

13. Provide a comment on any other factors which influence the market for the like goods and goods subject to review (e.g., seasonality).

Appendix reference:

A5 Board members and principal shareholders

1. Please complete the table below for any shareholder with >5% holding in the company who also has interest in any organisation related to the production, marketing, administration, and sale of the like good in the UK or the People's Republic of China.

Name	Shareholding in company	Name of Other Companies in which person holds interest	Activity of other companies

+Add additional rows as required.

2. Please complete the table below for any members of the Board of Directors who also has interest in any organisation related to the production, marketing, administration and sale of the like good in the UK or the People's Republic of China.

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies

+Add additional rows as required.

A5 Operational links with other companies or persons

1. Please complete the table below if your company has established long term agreements or relationships with any company/companies located in the UK, the People's Republic of China or in third countries for the production (e.g., sub-contracting), supply and sale of the goods subject to review or the like goods, or other licensing, technical patent or compensatory agreements. Please provide the relevant contract for each agreement listed.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix Number of contract
Not applicable			

+Add additional rows as required

A6 Accounting practices

1. Give the address where your company's accounting records are kept and can be verified by the TRA. If records are maintained in different locations, please indicate which records are kept at which location. If records are digital and do not have a physical location, please mark as N/A.

Records address	What records are held?

+Add additional rows as required

2. 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 this period or in your accounting practices over the last four financial years, please describe these changes.

Appendix reference:

3. 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, including the financial statements and audit report covering the injury period.

Appendix reference:

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period (1 April 2018 – 31 March 2022).

Appendix reference:

5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI and the most recent financial year. This includes:
- the trial balance which covers the beginning of the financial year to 1 April 2021;
 - the trial balance which covers the full financial year including 1 April 2021;
 - the trial balance which covers the beginning of the financial year to 31 March 2022.

Appendix reference:

6. For your company and any associated parties involved in the production, marketing or sales of the like goods or the goods subject to review, please attach copies of relevant management reports (e.g. profit and loss statement) for the profit centre that includes the like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

Appendix reference:

7. If your company is part of a group of companies, please also attach a copy of the consolidated accounts of the group for your most recently completed financial year.

Appendix reference:

8. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g. costing, debtors, creditors) and other sales or production systems 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

Appendix reference:

9. Have you changed your financial policies during the injury period? If so, please explain the changes, including dates and the reasons for those changes along with the financial impact of those changes against the like goods.

Appendix reference:

SECTION B: About your goods

B1 Understanding your like goods

The goods subject to review in this review are defined in [‘the scope of this review’](#).

1. Please complete **Annex 2 – Product comparison**, If your company manufactures a range of like goods, list this information for each individual make and model in the range.
2. If there are differences in characteristics within your range of like goods which cause distinguishable differences in price, explain those differences and the effect they have. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.

Coil sizes, coil specification and grades, price variation due to €/£ heavier gauge 15/20mm and 1830/2000 wide

Appendix reference:

3. Indicate in the box below any physical, commercial or functional differences between your products and the goods subject to review. If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

Appendix reference:

4. Please provide details of your like goods regarding their production processes, interchangeability, raw materials used, degree of model differentiation channels of distribution and sale, pricing and other relevant characteristics.

Appendix reference:

SECTION C: Costs and production

C1 Cost to make and sell

1. Please Complete **Annex 3 – Cost to make and sell** for your total goods and for the total like goods.
2. If your company is vertically integrated or some of the inputs (e.g., raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement, and attach documentation demonstrating any agreements you have.

Narrow Strip: raw materials are sourced from within Liberty Steel UK in the form of EAF slab. Steel is melted and cast at the Rotherham plant, then rolled into slab at the Stocksbridge plant.: Slabs are reheated and rolled to size. They are then inspected and finished according to customer requirements, prior to despatch.

Wide strip: steel slab is reheated then reduced to side using a roughing mill and finishing mill. The product is then coiled and cooled prior to despatch.

Appendix reference:

3. Please state the cost allocation method for each cost type listed in **Annex 3 – Cost to make and sell**.

Appendix reference:

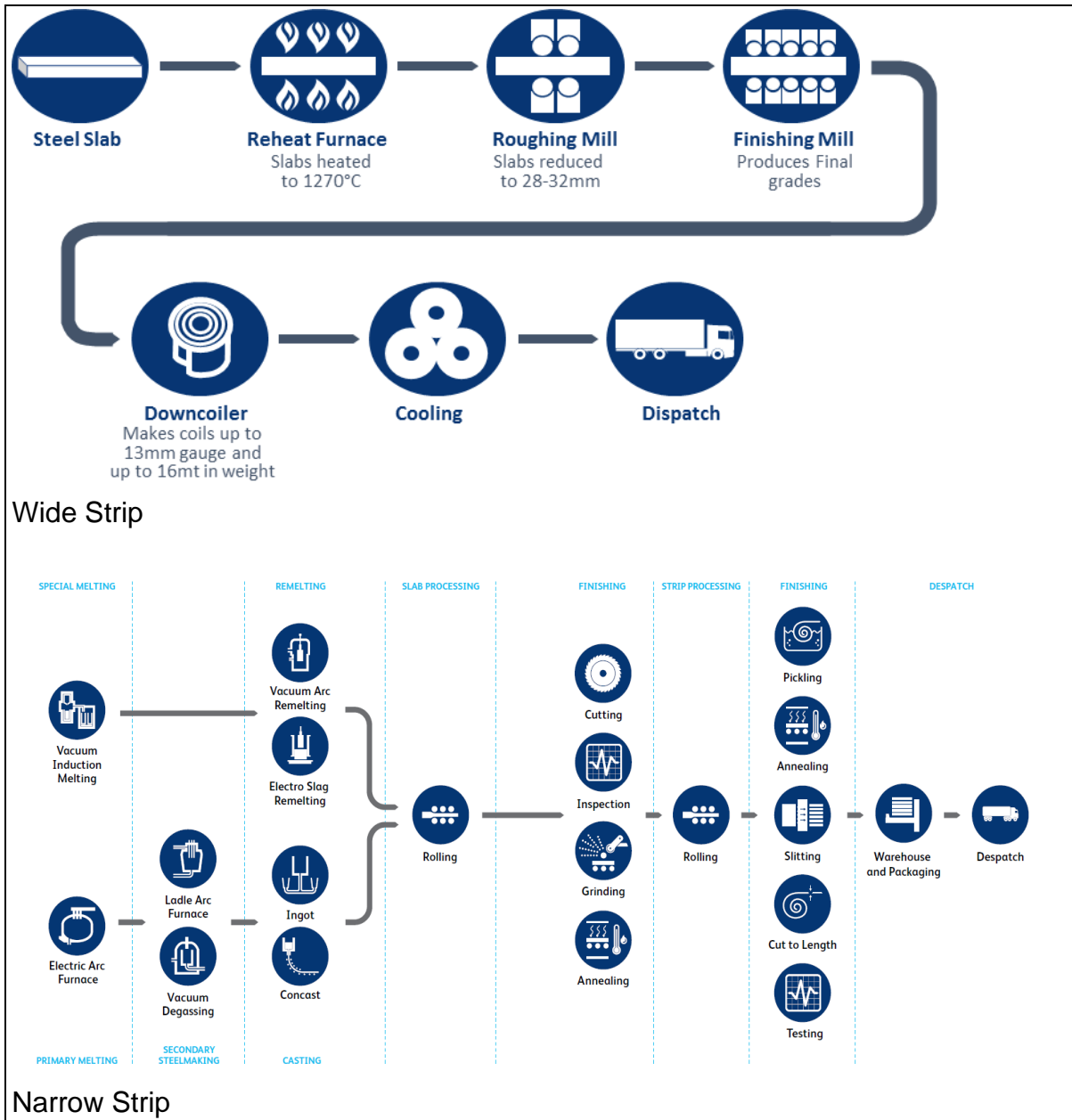
C2 Cost and sales reconciliation

1. Please complete **Annex 4 – Cost reconciliation**: please only fill in the white cells and include reference to the source documents of the inserted data.

C3 Production process

1. Please provide a written summary and a diagram/flow of your production process clearly indicating the different production stages for your like goods carried out by your company.

See section A3 (2)



Appendix reference:

- Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. Please describe the manufacturing process of the like goods, its level of complexity and the investment of capital involved. If a production process is carried out outside the UK, please explain the nature of the activity and where this process step takes place.

All parts of the process take place in the UK

Appendix reference:

- Please provide the physical addresses (including town/city and county) of all your company's UK sites/facilities involved in the production of the like goods.

Company name	Physical address
Liberty Steel Newport	Corporation Road Newport Gwent NP19 4XE
Liberty Narrow Strip	Sheffield Road Rotherham S60 1BN

Appendix reference:

+Add additional rows as required

C4 Raw material (RM) and major input purchases

- Please complete **Annex 5 – Raw materials and input purchases**, detailing by supplier, purchases, which account for more than 5% of total cost to make and sell (or if energy more than 1%), used in the production of the like goods during the POI by your company
- Please provide an invoice and any supporting documents for two of your suppliers stated within **Annex 5 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

Appendix reference:

C5 Purchases of like goods and/or goods subject to review

- Complete **Annex 6 – Purchases of like goods** and/or goods subject to review
This should include information relating to your company's total annual purchases of the like goods and/or goods subject to review over the injury period. All figures should be reported net of tax. Please list for each year every country you have purchased from in a separate row.
- 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 like goods and/or goods subject to review.

Appendix reference:

SECTION D: Sales

D1 – Domestic sales

1. Please complete **Annex 7 – Transaction by transaction (T by T) domestic sales**
 - These should include all your domestic sales and returns of the like goods for the POI. Include the like goods you have produced, purchased and resold and/or goods subject to review that you have purchased and resold.
 - Please report returns as negative (-) sales figures.
 - Please ensure that you correctly categorise each sale by commodity code.
 - For transactions or invoices that consist of multiple commodity codes, the same invoice number should be referenced.

Please contact the Case Team if you can't provide the relevant information in sufficient detail.

D2 Sales reconciliation

1. Please complete the sales reconciliation table in **Annex 8 – Sales reconciliation**
2. Additionally, please complete the sales forecast table in **Annex 8 – Sales reconciliation** providing quantitative estimates (e.g. projections or forecasts) for the sales revenue and quantity of like goods and of all other goods you produce on the UK market for the next five years.

D3 Distribution channels and price setting

1. If applicable, please provide copies of price lists for the like goods for the POI.

Appendix reference:

2. If any price reductions have been applied to any of your sales of like goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.
 - Explain the terms and conditions that must be met for any price reduction.
 - Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.
3. Please provide details of your distribution network for like goods if you have one.

Appendix reference:

4. Do your sales usually include delivery in the price? If so, please explain how you calculate delivery costs and prices?

Appendix reference:

5. Does delivery price vary between customers? If so then please explain what these differences may relate to.

Appendix reference:

6. Attach sales contracts for the top five customers by volume in **Annex 7 – Transaction by transaction (T by T) domestic sales** that you have sold like goods to in the period of investigation

Appendix reference:

7. Select examples of domestic sales of like goods to two different customers included in **Annex 7 – Transaction by transaction (T by T) domestic sales**. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

Appendix reference:

D4 Captive use

1. For products classified for internal use in **Annex 2 – Product Comparison** please specify how these goods were used

Material was used for Tube making (Hollow sections)

Appendix reference:

2. Please comment on whether your internal use of the like good would be affected if the existing countervailing measure on the goods subject to review no longer applied? Please attach evidence to support your answer where possible.

Cheap HRC will allow cheap imports of hollow sections, which is already happening via Turkey etc

Appendix reference:

SECTION E: Injury to your company

1. Would your company suffer from injury if the existing countervailing measure on the goods subject to review no longer applied? If so, please describe the nature and degree of the injury. If your company is already suffering injury, would the nature or source of the injury change if the measures were to no longer apply?

Mass Import of cheap comparable steel products

Appendix reference:

2. How would your costs to make and sell change if the existing countervailing measure on the goods subject to review no longer applied, what measures would your company have to take to remain competitive. If possible, please provide annual estimates (e.g., projections or forecasts) for the next five years for any changes and use the text box below to explain the methods used to calculate these estimates.

Appendix reference:

3. Please complete **Annex 9 – Injury**. This should be completed in reference to your UK production of the like goods for the injury period.
4. Please explain how you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods.

Appendix reference:

5. Please explain how you assess your stock levels. Please indicate if your stock levels were abnormally high during the injury period. If so, please explain.

Appendix reference:

6. Please explain how you estimated your percentage of market share for the like goods.

Appendix reference:

7. Please explain how you calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations

Appendix reference:

8. Explain any variances between your actual and forecasted budgets over the injury period, with reference to your cash flow statements. Would your forecasted budgets be affected if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Appendix reference:

9. Please explain how you set your wages, and the causes of any significant variations.

Appendix reference:

10. Please explain whether any of the indicators listed in **Annex 9 – Injury** would be affected if the existing countervailing measure on the goods subject to review no longer applied. Please substantiate your claims with evidence. Where possible, please add additional rows in **Annex – 9 Injury** to provide estimates for the next five years (e.g., projections of forecasts). Please use the text box below to explain the methods used to calculate your estimates.

Appendix reference:

11. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure. Would your level of profit, before tax, as a percentage of turnover for the like goods be affected if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Appendix reference:

12. Explain how you set your current sales price for your like goods. Is this the same as your target sales price? If not, please explain the reasons for this. Would your sales price for your like goods be affected if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Appendix reference:

13. Complete **Annex 10 – Investments and Return on Investment**.

- For each investment category, indicate the amount of investment (apportioned, where applicable) and explain what the investment is for.
- Where possible, add columns in **Annex – 10 Investments and Return on Investments** to provide estimates (e.g., projections or forecasts) for future years assuming the measure is retained.
- For the investments you have made during the injury period, please also provide the depreciation incurred company-wide and for the like goods.

Appendix reference:

14. Please provide details of your typical source(s) of finance (e.g., loans, debt, share issues, bond issues etc.) for each category of investment relating to your company-wide investments.

Appendix reference:

15. Please describe any changes in your company's level and trends of returns on investment over the injury period. Please explain the nature and cause of this change and substantiate with supporting evidence e.g., funding proposals, loan approvals or other relevant financial documents.

16. Please explain whether your company's ability to make investments and/or ability to raise capital would be affected in the next five years if the existing countervailing measure on the goods subject to review no longer applied. Please substantiate your claims with evidence (e.g., company investment plans, etc) and if you have provided estimates explain how you calculated them.

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Appendix reference:

17. Please complete **Annex 11 – Forward sales contracts**. Describe and attach copies of all forward sales contracts/ongoing supply agreements for like goods. Comment on these forward sales contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation? Would your forward sales contracts be affected if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Forward sales can be affected as we offer a short lead time but if the HRC coming into the UK is booked 3 mnths in advance this business is lost in the UK

Appendix reference:

18. If your company is suffering from injury, please explain and indicate the degree to which this has been caused by the alleged subsidisation of the goods concerned. Please also explain and indicate the degree to which any other factors might have caused the injury, for example:

- volume and prices of imports not sold at subsidised prices
- contraction in demand or changes in patterns of consumption
- restrictive trade practices of, and competition between, third country and UK producers
- developments in technology; and
- export performance and the productivity of the UK.

Please substantiate your claim(s) with evidence.

Would the cause(s) or degree of injury change if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Volume will decline due to the cheaper imported HRC levels as UK manufacturing cannot sustain the losses created by high energy costs higher wages etc

Appendix reference:

19. Would there be any other effects on your industry and/or company if the existing countervailing measure on the goods subject to review no longer applied? Please substantiate your claims with evidence.

Cheaper imported prices, lowers Market level prices for local producers.

Appendix reference:

SECTION F: Subsidies

F1 General

The programmes being reviewed are listed in the table below. Please use this section of the questionnaire to provide any information you have on the programmes listed. You can also provide information on any other subsidy programmes that you believe relate to the production and/or sale of the goods concerned.

Subsidy programmes

No.	Subsidy name	Subsidy type
1	Energy saving and conservation grants	Grant Programme
2	Grants related to technological upgrading or transformation	Grant Programme
3	Various Ad hoc grants provided by municipal/regional authorities	Grant Programme
4	Preferential Lending - Loans for which the amount of interest that a company pays is lower than a comparable loan obtainable on the open market.	Preferential policy loans, credit lines, other financing and guarantees
5	Land Use Rights (LUR)	Government provision of goods at less than adequate remuneration
6	Enterprise Income Tax (EIT) privileges for Resource Products from Synergistic Utilisation	Direct Tax Exemption and Reduction Programme
7	EIT offset for research and development expenses	Direct Tax Exemption and Reduction Programme
8	Land use tax exemption	Direct Tax Exemption and Reduction Programme
9	VAT exemptions and import tariff rebates for the use of imported equipment and technology	Indirect Tax and Import Tariff Programme
10	Tax exemption for policy-based relocation	Indirect Tax and Import Tariff Programme

+Add/remove additional rows as required.

F2 Subsidies

1. Please complete **Annex 12 – Subsidies** providing as much information for each of the subsidies listed as possible. Please substantiate with any evidence if possible

Add additional lines for any further subsidy you would like the TRA to consider into the relevant tables depending on the type of subsidy it is (i.e., grants, loans etc).

2. Please provide any further information on subsidies that you feel is relevant to the investigation.

Appendix reference:

SECTION G: Supplementary Questions

G1 Economic interest

The economic interest test helps the TRA assess the economic impact of a measure compared to what would happen if it no longer applied. There are six factors which the TRA must consider as part of the economic interest test:

- i) The injury caused by the subsidised goods to UK industry and the benefits to that industry in removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that the TRA consider relevant.

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company's UK sites/facilities, where relevant and possible.

G2 Background

1. Please provide any known names, legal addresses and telephone numbers of the following domestic companies:
 - Those that produce Hot Rolled Flat and Coil products in the UK

- Those that are involved in the importation, distribution, or sale of Hot Rolled Flat and Coil products from third countries

This would be too long a list to provide as there are thousands of companies involved in the Importation, distribution and sales in the UK

Appendix reference:

2. Please provide an overview of your upstream supply chain for Hot Rolled Flat and Coil products, (e.g., producers of raw materials). Where possible, please describe the number, location, and size of UK producers at each stage.

Supply chain consists of slab manufacture from raw materials – scrap and iron ore-coke-limestone through ironmaking to steelmaking and slab casting in the UK. Transport to the mill by rail. Reheating, rolling, heat treatment and finishing of Hot rolled coil followed by delivery (usually truck to the customer)
Our upstream supply chain is therefore 100% UK

Appendix reference:

3. Please provide an overview of your downstream supply chain. Please indicate who the consumers of Hot Rolled Flat and Coil products are, which industry and level of trade they relate to and whether they are companies or private individuals. Are Hot Rolled Flat and Coil products considered to be an intermediate and/or final good?

There are too many to list.

Appendix reference:

G3 Your company

4. Please complete **Annex 12 – Economic Interest Test**, providing employment figures in full-time equivalents (FTE) for each of your company's UK sites or facilities
5. How would these employment figures be affected if the existing countervailing measure no longer applied? Please substantiate your claims with evidence.

Appendix reference:

6. How would your domestic sales of Hot Rolled Flat and Coil products be affected if the existing countervailing measure was revoked? Please substantiate your claims with evidence.

Appendix reference:

7. How significant is the production of Hot Rolled Flat and Coil products relative to your company's entire UK production?

Appendix reference:

G4 Potential impacts of a measure

8. Please describe how you would expect a decrease in the import prices of Hot Rolled Flat and Coil products to affect each of the following. Where possible, please support your claims with evidence:

- Domestic prices of Hot Rolled Flat and Coil products

LIBERTY STEEL UK reserves its rights to submit further comments and information at a later stage of this proceeding
Appendix reference:

- Total UK production of Hot Rolled Flat and Coil products

LIBERTY STEEL UK reserves its rights to submit further comments and information at a later stage of this proceeding
Appendix reference:

- total imports of the goods subject to review to the UK

LIBERTY STEEL UK reserves its rights to submit further comments and information at a later stage of this proceeding
Appendix reference:

- total exports of Hot Rolled Flat and Coil products from the UK

LIBERTY STEEL UK reserves its rights to submit further comments and information at a later stage of this proceeding

Appendix reference:

9. Do you know of any related industries that would be affected if the existing countervailing measure on Hot Rolled Flat and Coil products was revoked?

Please consider in particular:

- upstream industries – those who produce inputs (such as raw materials) needed for Hot Rolled Flat and Coil products

It would have the potential to significantly disrupt supply chains in the UK, particularly the electric arc furnace production levels and Rotherham, and also to British Steel who supply slabs to Newport.

Appendix reference:

- downstream industries – those who purchase Hot Rolled Flat and Coil products

It is likely the traders would increase their market position to the detriment of stockists and other mill representation e.g. from the EU

Appendix reference:

- industries for complimentary goods – those which would typically be bought alongside Hot Rolled Flat and Coil products (such as ink being bought with printers)

Appendix reference:

- industries for substitute goods – those which might be bought instead of Hot Rolled Flat and Coil products (such as margarine instead of butter).

Appendix reference:

10. To what extent would you expect any changes in prices for Hot Rolled Flat and Coil products to be passed onto final consumers?

Inevitably since the market is so competitive almost certainly the value of finished and unfinished goods would drop.

Appendix reference:

11. Would your plans for investment or expansion in the UK over the next five years be affected if the existing countervailing measure was revoked? Please support your claims with evidence.

There would be no plans for investment or expansion

Appendix reference:

12. As a public body, the TRA 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 countervailing measure might disproportionately affect any of these groups, please provide it in the box below.

It would have no impact as far as we are aware on any particular group.

Appendix reference:

13. Please explain whether and how continuing a trade remedy measure could affect the number or range of suppliers in the Hot Rolled Flat and Coil products market.

There is already significant competition in the UK and post Brexit we would argue even more competition from EU mills as we are being considered a 3rd country. This is not about competitiveness but around the potential dumping of a product at substantially below European cost levels.

Appendix reference:

14. Please explain whether and how continuing a trade remedy measure could affect suppliers' ability to differentiate their products by price, quality, service or innovation in the Hot Rolled Flat and Coil products market.

This is not about competitiveness but around the potential dumping of a product at substantially below European cost levels.

Appendix reference:

15. Please explain whether and how continuing a trade remedy measure could affect the cost of switching between suppliers in the Hot Rolled Flat and Coil products market.

LIBERTY STEEL UK reserves its rights to submit further comments and information at a later stage of this proceeding

Appendix reference:

16. Please explain whether and how continuing a trade remedy measure could enable suppliers to set agreed prices between themselves or for certain consumers or products.

LIBERTY STEEL UK reserves its rights to submit further comments and information at a later stage of this proceeding

Appendix reference:

17. Please explain whether and how continuing a trade remedy measure could affect choices of Hot Rolled Flat and Coil products available to consumers

LIBERTY STEEL UK reserves its rights to submit further comments and information at a later stage of this proceeding

Appendix reference:

18. Please explain whether and how continuing a trade remedy measure could affect the ability of consumers to make informed decisions.

LIBERTY STEEL UK reserves its rights to submit further comments and information at a later stage of this proceeding

Appendix reference:

19. Are there any additional economic factors that you consider to be relevant for the economic interest test in this review?

LIBERTY STEEL UK reserves its rights to submit further comments and information at a later stage of this proceeding

Appendix reference:

SECTION H: 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 – About your goods	
Section C – Costs and production	
Section D - Sales	
Section E – Injury to your company	
Section F – Subsidies	
Section G – Supplementary Questions	

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title

+Add additional rows as required