



EUROPEAN COMMISSION

Directorate General Trade

Directorate General Trade Defence

**LIMITED VERSION**

**VERSION OPEN FOR CONSULTATION**

*(tick box as appropriate)*

## SAFEGUARD QUESTIONNAIRE

**Company name:**

**Contact person at the company:**

- |  |   |
|--|---|
| <b>Intended for:</b>                               | <b>Exporters of certain steel products to the European Union</b>  |
| <b>Product concerned:</b>                          | Certain steel products, please refer to section B of the questionnaire  |
| <b>Statutory reference:</b>                        | Regulation (EU) No 2015/478 of the European Parliament and of the Council of 27 March 2015 and Regulation (EU) No 2015/755 of the European Parliament and of the Council of 19 May 2015 |
| <b>Regulatory reference:</b>                       | Notice of Initiation, OJ C 111, 26.03.2018, p. 29   |
| <b>Internal registration number:</b>               | <b>SFG009</b>   |
| <b>Deadline for response to the questionnaire:</b> | <b>19 April 2018</b>  |

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## **TABLE OF CONTENTS**

This questionnaire is made up of the following sections:

<b>Section A</b>	<b>General instructions for completing the questionnaire</b>
<b>Section B</b>	<b>Products concerned</b>
<b>Section C</b>	<b>General information</b>
<b>Section D</b>	<b>Information concerning each of the products concerned as defined in section B</b>
<b>Section E</b>	<b>Certification</b>
<b>Annex I</b>	<b>Version for inspection by interested parties - guidance</b>
<b>Annex II</b>	<b>Declaration on copyright</b>

## SECTION A – GENERAL INSTRUCTIONS FOR COMPLETING THE QUESTIONNAIRE

- (1) This questionnaire is intended for exporters to the European Union of the 26 products subject to the current safeguard investigation. A list of the products in question with their corresponding CN codes is at section B.
- (2) This questionnaire is composed of a general section which requests information on the whole activity of the company. It also includes specific questions relating to each of the products subject to the investigation.
- (3) **When exporters manufacture/export more than one of the products concerned**, they are requested to complete:
  - section C (general information) once and,
  - section D, separately for each of the products they manufacture/export.
- (4) If you have any difficulties in completing all or part of the questionnaire, or require clarification on any questions asked, contact should be made with the officials in charge of the case (see front page).
- (5) Where the Commission finds that any interested party has supplied false or misleading information, it may disregard any such information and make use of the facts available.
- (6) Member States of the European Union are Austria, Belgium, Bulgaria, Croatia, Czech Republic, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the United Kingdom. Answers to questions referring to the “Total Union” or “European Union” should include **all** these countries.
- (7) Although the questionnaire is addressed to your company, it is understood that **all subsidiaries or other related companies involved in the manufacture and/or sales of the product concerned in the European Union are also part in the proceeding and their information should be incorporated in the response.** You should fill in the questionnaire per entity. However, if, for practical reasons, it is easier for you to reply at group level for certain activities such as sales of the product concerned, then do so. Please indicate clearly which companies have contributed to the information in the questionnaire. If you have any problems or questions in that respect please contact the case handlers in charge.
- (8) Information and supporting evidence may be given on a confidential basis, where appropriate. Confidential information, i.e. business secrets etc, will not be made available to any other interested party. A **non-confidential** summary of your response **must** be provided within the time limit specified. Where a meaningful non-confidential summary is not provided, and where the information is susceptible of such summary, the information submitted may be disregarded. The non-confidential versions of all responses submitted to the Commission services are at the disposal of all interested parties, including your own, for inspection upon appointment with the casehandlers.

- (9) If you have any difficulties in filling in all or part of the questionnaire, or require clarification on any questions asked, you should contact as soon as possible the officials in charge of the case, stating the difficulties experienced or the clarification required (see cover page of the questionnaire for officials in charge).
- (10) **As already mentioned in the cover letter, the Commission services may carry out on-the-spot visits to examine the records of your company in order to verify the information provided in response to this questionnaire. All worksheets and documents used in answering this questionnaire; in particular those linking the information supplied with accounting and management records should, therefore, be retained for verification purposes.**
- (11) If you intend to have another party acting on your behalf, e.g. a law-, accountancy- or consultancy firm, please ensure that the Commission receives an original of the appropriate power of attorney.
- (12) Information submitted to the Commission for the purpose of trade defence investigations **shall be free from copyrights**. Interested parties, before submitting to the Commission information and/or data which is subject to third party copyrights, **must request specific permission to the copyright holder explicitly allowing a) the Commission to use the information and data for the purpose of this trade defence proceeding and b) to provide the information and/or data to interested parties to this investigation in a form that allows them to exercise their right of defence**. Interested parties are invited to fill in the annexed form (Annex II) attesting that the information submitted is free from copyrights or that they have obtained the above mentioned permission before submitting it. Interested parties shall contact the Commission for any doubts about the handling of copyrighted information.
- (13) **The questionnaire duly completed should reach the European Commission at the address given on the cover page not later than 19 April 2018.**
- (14) Computer data should be supplied exactly in the format requested in the Excel-file. The tables in the sheet named “General” should only be completed once, whereas the sheet named “Economic Data” should be completed once for each of the products concerned produced by your company. If you feel that you cannot present the responses as requested, please contact the officials in charge.

**SECTION B - PRODUCTS CONCERNED**

The products concerned by the investigation are as follows:

Product number	Product category	CN Codes
1	Non Alloy and Other Alloy Hot Rolled Sheets and Strips	72081000, 72082500, 72082600, 72082700, 72083600, 72083700, 72083800, 72083900, 72084000, 72085299, 72085390, 72085400, 72111400, 72111900, 72126000, 72251910, 72253010, 72253030, 72253090, 72254015, 72254090, 72261910, 72269120, 72269191, 72269199
2	Non Alloy and Other Alloy Cold Rolled Sheets	72091500, 72091690, 72091790, 72091891, 72092500, 72092690, 72092790, 72092890, 72099020, 72099080, 72112320, 72112330, 72112380, 72112900, 72119020, 72119080, 72255020, 72255080, 72262000, 72269200
3	Electrical Sheets (other than GOES)	72091610, 72091710, 72091810, 72092610, 72092710, 72092810, 72251990, 72261980
4	Metallic Coated Sheets	72102000, 72103000, 72104100, 72104900, 72106100, 72106900, 72109080, 72122000, 72123000, 72125020, 72125030, 72125040, 72125061, 72125069, 72125090, 72259100, 72259200, 72269910, 72269930, 72269970
5	Organic Coated Sheets	72107080, 72124080
6	Tin Mill products	72091899, 72101100, 72101220, 72101280, 72105000, 72107010, 72109040, 72121010, 72121090, 72124020
7	Non Alloy and Other Alloy Quarto Plates	72085120, 72085191, 72085198, 72085291, 72089020, 72089080, 72109030, 72254012, 72254040, 72254060, 72259900
8	Stainless Hot Rolled Sheets and Strips	72191100, 72191210, 72191290, 72191310, 72191390, 72191410, 72191490, 72192210, 72192290, 72192300, 72192400, 72201100, 72201200
9	Stainless Cold Rolled Sheets and Strips	72193100, 72193210, 72193290, 72193310, 72193390, 72193410, 72193490, 72193510, 72193590, 72199020, 72199080, 72202021, 72202029, 72202041, 72202049, 72202081, 72202089, 72209020, 72209080
10	Stainless Hot Rolled Quarto Plates	72192110, 72192190
11	Grain-Oriented Electrical Sheet	72251100, 72261100

12	Non Alloy and Other Alloy Merchant Bars and Light Sections	72143000, 72149110, 72149190, 72149931, 72149939, 72149950, 72149971, 72149979, 72149995, 72159000, 72161000, 72162100, 72162200, 72164010, 72164090, 72165010, 72165091, 72165099, 72169900, 72281020, 72282010, 72282091, 72283020, 72283041, 72283049, 72283061, 72283069, 72283070, 72283089, 72286020, 72286080, 72287010, 72287090, 72288000
13	Rebars	72142000, 72149910
14	Stainless Bars and Light Sections	72221111, 72221119, 72221181, 72221189, 72221910, 72221990, 72222011, 72222019, 72222021, 72222029, 72222031, 72222039, 72222081, 72222089, 72223051, 72223091, 72223097, 72224010, 72224050, 72224090
15	Stainless Wire Rod	72210010, 72210090
16	Non Alloy and Other Alloy Wire Rod	72131000, 72132000, 72139110, 72139120, 72139141, 72139149, 72139170, 72139190, 72139910, 72139990, 72271000, 72272000, 72279010, 72279050, 72279095
17	Angles, Shapes and Sections of Iron or Non Alloy Steel	72163110, 72163190, 72163211, 72163219, 72163291, 72163299, 72163310, 72163390
18	Sheet Piling	73011000
19	Railway Material	73021022, 73021028, 73021040, 73021050, 73024000
20	Gas pipes	73063041, 73063049, 73063072, 73063077
21	Hollow sections	73066110, 73066192, 73066199
22	Seamless Stainless Tubes and Pipes	73041100, 73042200, 73042400, 73044100, 73044910, 73044993, 73044995, 73044999
23	Bearing Tubes and Pipes	73045112, 73045118, 73045932, 73045938
24	Other Seamless Tubes	73041910, 73041930, 73041990, 73042300, 73042910, 73042930, 73042990, 73043120, 73043180, 73043910, 73043952, 73043958, 73043992, 73043993, 73043998, 73045181, 73045189, 73045910, 73045992, 73045993, 73045999, 73049000
25	Large welded tubes	73051100, 73051200, 73051900, 73052000, 73053100, 73053900, 73059000
26	Other Welded Pipes	73061110, 73061190, 73061910, 73061990, 73062100, 73062900, 73063011, 73063019, 73063080, 73064020, 73064080, 73065020, 73065080, 73066910, 73066990, 73069000

**SECTION C – GENERAL INFORMATION.**  
***THIS SECTION SHOULD ONLY BE COMPLETED ONCE***

**C.1 Corporate information**

Name:

Legal form:

Address:

Telephone:

Telefax:

e - mail of contact person:

and indicate the names of the persons to contact and their function within the company

**C.2 Owner or principal shareholders**

Total share capital:

List the major shareholders in your company (including their part of shareholding).

Please indicate if they are involved with the production and/or sale of the products concerned.

**C.3 Structure of the company**

Please outline your company's general corporate structure and affiliations.

**C.4 Company organisation**

Please supply a diagram outlining the hierarchical and organisational structure of your company and its related entities.

**C.6 Range of products**

List all of products produced by your company in the following table for the year 2017. Distinction should be made between the different "products concerned" identified above in Section B.

<b>PRODUCT</b>	<b>Tonnage produced</b>	<b>% of total production</b>
Product concerned No		
Product concerned No		
.....		
.....		
Other products		
Total products		

Please attach a technical description together, if available, with sales brochure and technical specifications for each of the "products concerned" exported by your company to the Union market.

**C.7 Comparison**

Please comment on the comparability of the products concerned exported to the European Union with that produced and sold by your competitors producing in the Union. Identify any differences in the technical and physical characteristics and/or end uses of the products exported. Please also indicate if differences in production process cause any difference in quality, end use or application.

**C.8 Audited accounts**

Attach audited accounts (balance sheet and profit and loss account) for the last three financial years for your company.

**C.9 Total sales volume**

Please complete the following table:

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>TOTAL COMPANY SALES VOLUME</b>					
Domestic market					
European Union					
USA					
Other third countries					
<b>SALES VOLUME OF ALL THE PRODUCTS CONCERNED</b>					
Domestic market					
European Union					
USA					
Other third countries					



**C.10 Total sales value (net free of taxes after all discounts)**

Please complete the following table:

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>TOTAL COMPANY SALES VALUE</b>					
Domestic market					
European Union					
USA					
Other Third countries					
<b>SALES VALUE OF ALL THE PRODUCTS CONCERNED</b>					
Domestic market					
European Union					
USA					
Other third countries					

**C.11 Company's profitability (%)**

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Total activity					
Domestic Market					
US Market					
EU Market					
Other Markets					

**SECTION D – INFORMATION CONCERNING EACH OF THE PRODUCTS  
CONCERNED (AS DEFINED IN SECTION B) PRODUCED BY YOUR  
COMPANY**

**D.1 Introductory note**

Please take careful note that this section should be completed separately for **each of the "products concerned"** as defined in above section B.

**D.2 Production and capacity**

	2013	2014	2015	2016	2017
Production (tonnes)					
Capacity (tonnes)					
Capacity utilisation (%)					

Production should cover both products sold by the company and products used internally for further processing (captive use).

Capacity refers to maximum possible production. Describe the shift system operated by your company and the method used to calculate capacity installed.

In the event that your company produces products other than the product concerned on the same equipment and machinery used for the production of the product concerned, please list these products and explain the basis for your allocation of your company's total production capacity.

**D.3. Total sales volume, captive use and stock variation (in tonnes)**

	2013	2014	2015	2016	2017
Total sales volume					
Captive use					
Stock variation					

**D. 4 Destination of sales**

Report total sales quantity, value of sales and average sales prices for the product concerned in the following table:

Sales quantity should be reported in tonnes.

Value of sales and average sales price should be reported net, ex-factory, free of taxes, after all rebates/discounts (please specify the currency).

	2013	2014	2015	2016	2017
<b>Sales on your domestic market</b>					
Volume					
Value					
Unit price					
<b>Sales in the EU</b>					
Volume					
Value					
Unit price					
<b>Sales in the USA</b>					
Volume					
Value					
Unit price					
<b>Sales to other third markets</b>					
Volume					
Value					
Unit price					

#### **D.5. Consumption in your domestic market**

Please estimate the development of consumption of the "product concerned" in your domestic market. Please support the information provided (be it actual knowledge or "best estimates" according to experience) on the various markets by supplying appropriate documentation.

	2013	2014	2015	2016	2017
Consumption					

#### **D.6. World-wide capacity and production**

Please comment on the current situation and the foreseen developments for the next three years of the capacity and production of the product concerned installed on your domestic market, in the EU and world-wide. Please support the information provided (be it actual knowledge or "best estimates" according to experience) on the various markets by supplying appropriate documentation.

#### **D. 7. Future plans on production and capacity:**

Please comment on your future plans (years 2018, 2019, 2020) for production and capacity of the products concerned in the light of the US Safeguard Measures in the event that:

- a) definitive Safeguard Measures are imposed by the EU,
- b) definitive Safeguard Measures are **not** imposed by the EU.

#### **D.8 Future Plans for Sales**

Please comment on your future forecasts (years 2018, 2019, 2020) for sales of the products concerned in the light of the US Safeguard Measures in the event that:

- a) definitive Safeguard Measures are imposed by the EU,
- b) definitive Safeguard Measures are **not** imposed by the EU.

Do you expect any significant changes in your domestic and other third markets as a result of the US Safeguard Measures?

#### **D.9 Other Factors**

The investigation must examine factors other than trends in imports which may have caused or may threaten to cause injury to the Union producers concerned.

Please comment on these potential factors, if any, and their evolution. Explain how they may affect the situation of the market for each product.

This analysis may include your views on:

- the situation of the EU demand for the "product concerned",
- the overall situation on the world market of the "product concerned" and the demand for exports towards third countries,
- the competitiveness of EU producers (including quality, efficiency and performances of your production lines) with respect to competitors,
- the reasons and the consequences of any reduction in your exports to the US or other markets.

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

**SECTION E - CERTIFICATION**

I, the undersigned, hereby certify that the information contained in this response is complete and correct to the best of my knowledge and belief and I understand that the information submitted may be subject to audit and verification by the European Commission.

I am willing / am not willing to accept a visit from the Commission services to my premises to verify this reply.

\_\_\_\_\_

Date

\_\_\_\_\_

Signature of authorised person

\_\_\_\_\_

Name and title of authorised person

**VERSION FOR INSPECTION BY INTERESTED PARTIES - GUIDANCE**

When completing the questionnaire version open for consultation by interested parties you should bear in mind that all exporters, importers and other Union producers will have access to it. The reply open for consultation should be sufficiently detailed to permit a reasonable understanding of the substance of the information submitted in confidence.

In order to assist you in completing the questionnaire version open for consultation by interested parties, we advise you to act as follows:

1. Use the completed “limited” questionnaire response as a basis. Identify all information in the limited response which you consider is not limited and **copy** it to the file for consultation.
2. After this, check once more whether the information you did not copy to the file for consultation is really limited. If you still consider it to be confidential, you must give the reasons why, item by item and summarise the limited information in a form which is adequate for the consultation by interested parties. If, in exceptional circumstances, it is not possible to even summarise the limited information, give reasons why summarisation is not possible. In any event, information about production, capacity, capacity utilisation, purchases, stocks, sales, resales, captive use, overall profitability of the company, investments, employment, etc., if considered confidential, should be replaced with indexes, percentages or similar presentation.

**Examples on how to summarise “limited” information.**

- ◆ When the information concerns numbers for various years you can use indices.

Example of limited information:

2015	2016	2017
20.000 EUR	30.000 EUR	40.000 EUR

The summary open for consultation by interested parties could be as follows:

2015	2016	2017
=100	150	200

- ◆ When the information concerns a single number you can apply a % change to it .

Example of limited figure:

"My sales price is EUR 300 per tonne."

The summary for consultation could be as follows:

"My sales price is EUR 330 per tonne" (+ footnote saying: "actual numbers have been amended by a margin of maximum  $\pm 10\%$  to protect confidentiality").

- ◆ When the limited information concerns text you can either summarise it or eliminate the names of parties by indicating their function.

Example: TRADING COMPANY Ltd told me that the prices of imports were 20% lower.

Summary for consultation by interested parties: **[one of my customers]** told me that the prices of imports were 20% lower.

**DECLARATION ON COPYRIGHT**

Please choose one of the options specified below and fill in the respective form as instructed in point 12 in Section A of this Questionnaire.

**Option 1 – the questionnaire reply contains no copyrighted information:**

*"I, Mr/Ms ..., declare that none of the information and/or data submitted in this questionnaire reply is subject to third party copyrights"*

**Option 2 – the questionnaire reply contains copyrighted information**

**a) Permission obtained:**

*" I, Mr/Ms ..., declare that I am submitting to the Commission information and/or data in tables/annexes etc. which is subject to third party copyrights for which I have requested and obtained specific permission from the copyright holder/s (name/s of the company/ies) explicitly allowing [please attach document attesting the permission if possible]:*

*- the Commission to use the information and data for the purpose of this trade defence proceeding and*

*- to provide the information and/or data to interested parties to this investigation*

*I also declare that all the other information and data submitted for the purpose of this investigation are free from copyrights."*

**b) Permission not obtained:**

*" I, Mr/Ms ..., declare that I am submitting to the Commission information and/or data in tables/annexes etc. which is subject to third party copyrights for which I have requested but not obtained specific permission from the copyright holder/s (name/s of the company/ies) to provide the information and/or data to interested parties to this investigation (I provide a meaningful summary of the copyrighted information).*

*I also declare that all the other information and data submitted for the purpose of this investigation are free from copyrights."*