



04 December 2020

Director
Investigations 1
Anti-Dumping Commission
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Canberra ACT 2601

BY EMAIL:
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Dear Director,

Reinvestigation of Certain Findings in Report Nos. 499 and 505

Hot rolled structural steel sections exported to Australia from Japan, the Republic of Korea, Taiwan (except for exports by Feng Hsin Steel Co Ltd) and the Kingdom of Thailand

ONESTEEL MANUFACTURING PTY LIMITED (**Liberty Steel**) the sole member of the Australian industry producing like goods to the goods the subject of the original review and inquiry, refers to the Anti-Dumping Commission's (**Commission**) *Preliminary Reinvestigation Report's* (PRR) Addendum, and to the submissions of the exporters, Hyundai Steel Company (**Hyundai**) and Siam Yamato Steel Co. Ltd (**Siam**), in response to the PRR.

1. Addendum¹

Liberty Steel supports the Commission's key conclusion that the expiration of the measures against Hyundai and Siam would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and material injury that the measures are intended to prevent.

The facts and evidence supporting the likelihood that both Hyundai and Siam would continue dumping and cause material injury to the Australian industry are substantial, as highlighted in the Addendum's conclusion:

2.11.1 Hyundai

*The Commission has observed that the Australian delivered selling prices of HRS imported from **Hyundai undercut that of the Australian industry in the majority of the period at an MCC level**. The close alignment of this pricing with that of the Australian industry, together with evidence of price offers for goods imported from **Hyundai influencing Australian industry prices**, is an indication that the pricing of the Australian industry has been directly impacted by dumped prices of HRS imported from Hyundai.*

*The Commission also observes that the **significant volumes** of HRS imported from*

¹ Addendum to Preliminary Reinvestigation Report 499-505 EPR 505/066

Hyundai, **maintenance of distribution links**, the **spare capacity** available and **historical dumping** since the imposition of the original measures are all an indication that **Hyundai is likely to continue** supplying the Australian market at dumped prices. Given the impact of Hyundai's pricing on that of the Australian industry and the significant volumes exported to Australia from Korea by Hyundai, the Commission is satisfied that **Australian industry has been unable to increase its pricing of HRS**. It is likely that this pricing behaviour will continue, and therefore, the Australian industry has experienced **material injury** in the form of price suppression.

Based on the Commission's analysis of the data described above and the evidence currently available, in respect of HRS exported to Australia from Korea by Hyundai, **the Commissioner is satisfied that the expiration of the measures would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and material injury that the measures are intended to prevent.** [emphasis added]

2.11.2 Siam

The Commission observed that the Australian delivered selling prices of HRS imported from **Siam undercut the Australian industry in all but one month** during the inquiry period. The close alignment of this pricing with that of the Australian industry is an indication that the pricing of **the Australian industry has been directly impacted by dumped** prices of HRS imported from Siam.

The Commission also observes that the **significant increase** in volumes of HRS imported from Siam following the change in the measures as a result of REP 346, maintenance of distribution links and dumping in the past and during the inquiry period, **are an indication that Siam will continue to export HRS to Australia from Thailand, and this is likely to occur at dumped prices**. Given the impact of Siam's pricing on that of Australian industry, the Commission is satisfied that Australian industry has been unable to increase its pricing of HRS and therefore, has **experienced material injury in the form of price suppression**.

Based on the Commission's analysis of the data described above and the evidence currently available, in respect of HRS exported to Australia by Siam, **the Commissioner is satisfied that the expiration of the measures would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and material injury that the measures are intended to prevent.** [emphasis added]

The above findings, and the demonstrated ongoing export of the goods to Australia at dumped prices, by both exporters, during the term of the current measures, supports the Commissioner's recommendation that the measures be continued for both exporters.

2. Submissions in response to PRR 499 and 505

In addition to commenting on the Addendum, this submission also addresses points made in submissions in response to PRR 499 and 505.

2(a) Adjustment for physical differences of the different grades of HRS

Liberty Steel's submission dated 11 September 2020 identified that the Commission's approach to determining price comparability, to enable fair comparison of the physical differences between the exported and domestic goods, was not the correct method:



The Commission has applied the wrong reasoning. The question of price comparison between models cannot be performed across different markets, but within the same market.²

Liberty Steel's view is consistent with that of the Panel Member who expressed her concern with the Commission's approach to assessing price comparability in Reports 499 and 505.

*My concern with this statement is whether the analysis should have been conducted between different MCC groups in order to understand whether **domestic prices** of goods change **between MCC groups** which have different physical characteristics rather than only within an MCC grouping, notwithstanding that the exported models are within the same group.³*

The Panel Member's comments provide guidance on the correct or preferable approach to determining if an adjustment based on price comparability; for the physical difference of **yield** strength between domestic and export models; is warranted. Applied here, there is strong and compelling guidance for the Commission to firstly determine if there are differences in price comparability between the different models (with different minimum **yield** strengths) on the **domestic market**. This methodology also avoids the Commission's irreconcilable position (that it creates) given that exported and domestic grades are rarely identical and are rarely sold in the same market to enable a fair comparison.

By adopting the approach suggested by the Panel Member, the Commission would more readily and practicably be able to determine if different models with a higher minimum yield strength (better structural steel performance requirement) sold on the domestic market, achieve a higher price than those with a lower minimum yield strength (lower performance requirement for structural steel). If they are, then an adjustment based on price comparability is justifiably able to be made for differences in minimum **yield strength** (the physical difference) between the domestic models and the export model. The basic reasoning to be tested is whether a structural steel customer is willing to pay more for a structural beam that is able to handle more load before it starts to yield and deform than one which is only able to handle a smaller load.

The Panel Member further questioned the utility of a cost/price comparison:

I'm also unsure as to the value of examining the cost/price correlation within a category as to whether this reveals much in terms of the price comparability difference between the exported model and the domestic model⁴

Despite the Panels Member's concerns, the PPR indicates that the Commission's reinvestigation team is silent on the concerns of the Panel Member. The PPR states:

As can be observed from the graph above, there is a strong correlation between the CTM and the selling price. This indicates that Tung Ho sets its prices into the market by reference to movements in the cost of production.⁵

With respect to the Commission's analysis, finding a high correlation between the cost to produce goods and the prices they sell for is unremarkable. Movements in the price of scrap alone (which represents 60%+ of the costs) will drive macro changes to the price of the goods in the same way that a rising tide lifts all boats, but different currents and eddies also have an effect. The Commission's observations that there are cost differences between the exported goods and the domestic goods is highly likely to be the result of either timing differences in the purchase of raw materials or an exporter's arbitrary cost allocations that are not related to the physical difference of yield strength.

² EPR505/063 p5

³ ADRP 2019_120 p14

⁴ Ibid P15

⁵ EPR 505/062 p22



In practical terms, the Commission's negative adjustments based on TS Steel Co. Ltd (**TS Steel**) and Tung Ho Steel Enterprise Corporation (**Tung Ho**) cost differences between the domestic goods and the exported goods is in effect an expression, by the Commission, of the following conclusion: that it costs *more* for each of these exporters to produce *large* volumes of *lower* performance grade steel for their domestic market, than it does to produce *smaller* volumes of *higher* performance grade steel to export to the Australian market. This clearly defies commercial logic and the basic premise of industrial-scale manufacturing.

If the Commission's findings are somehow valid, the Commission should also have found that *lower* minimum yield strength grades on the Taiwanese domestic market *cost more* to produce than the *higher* minimum yield strength grades, and that the *lower* minimum yield strength goods sold for a *higher* price. Quickly defaulting to cost comparability between the different grades and models (noted to have been, *helpfully*, provided by the exporter to assist with the adjustment quantification); exposes the Commission to making grave errors that contradict logic and steel manufacturing and sales principles and that can have a material impact on the Minister's decision.

2(b) Impact of Changes on the Non Injurious Price (NIP)

Due to the change in circumstances from the original investigation, the ADRP requested that the Commission reinvestigate its finding in relation to the NIP and to canvas whether the NIP should have been based on the Unsuppressed Selling Price (**USP**) of undumped sales by Tung Ho in the Australian market.

The PRR reports that the *Manual* sets out the hierarchy that the Commission will normally follow when deciding an appropriate method for establishing the USP. The *Manual* outlines that in calculating the USP, the Australian industry's selling prices at a time unaffected by dumping will normally be used. In this review, however:

*The Commission considers that the Australian industry's selling prices during the review period were **affected** by the presence of dumped imports in the market. As a result, the Commission considers the first method in the hierarchy to be inappropriate⁶ (emphasis added)*

Given the extensive and persistent level of dumping by Hyundai and SYS throughout the review period, the Commission's assessment that the first method in the hierarchy is inappropriate, is entirely justified. The Commission also correctly rules out the third method, i.e. ascertaining the NIP from a USP based on undumped sales, finding that:

these prices were likely affected by dumping from other sources⁷ [Hyundai and Siam]

Tung Ho made several submissions during the course of the review and continuation inquiries that confirmed that their prices were affected by dumping.

*...due to the measures recommended in SEF for other exporters. Business acumen would evoke THS (likewise Liberty Steel) to be in a position to **charge a higher** competitive price to Australia, further exceeding normal value in Taiwan and increasing negative dumping margin verified in the review of measures No 345 and No 499.⁸*

and

*THS will be competing with "other imports" that will be subject to measures, providing THS (likewise Liberty Primary Steel) the opportunity to **apply a price premium**⁹ [emphasis added]*

⁶ EPR505/062 p27

⁷ Ibid p27

⁸ EPR505-039 p2

⁹ EPR 505-048 p3

The second method of determining a USP in the *Manual*'s hierarchy is the Australian industry's *cost to make and sell (CTMS)* plus an amount for profit. The Commission considers this approach is preferable to using undumped prices, as it establishes a USP which is specific to the circumstances of the Australian industry which would reasonably reflect a price at which it might reasonably sell its product in a market unaffected by dumping. Liberty Steel supports establishing the USP based on the Australian Industry's CTMS plus an amount of profit on the basis that the Commission's approach to the level of profit is reasonable.

Liberty Steel considers the Australian industry's CTMS plus a reasonable amount for profit, provides the correct or preferable approach to calculating a USP – as it ensures that the economic return necessary to attract and retain capital for the purpose of producing like goods in Australia is achieved in circumstances where it is applied to derive a NIP that is less than the ascertained normal value.

Surprisingly, the PRR states that the Commission is not willing to apply any level of profit; justifying its view with the observation that the Australian Industry was not found to make a profit during the review period, the same period in which the Commission found that the dumped goods not only affected the Australian industry's prices, but those of other exporters. With respect, the point of applying an amount of profit to the CTMS calculation is to negate the impact of dumped sales (i.e. price suppressed sales) on the calculation of a USP.

The Commission's proposed approach makes no policy sense whatsoever, and has no support in the *Manual*. In practical terms if the Commission maintains this approach in the final reinvestigation report, it is supporting an outcome where, as soon as the Australian Industry reaches even the slightest level of profit, the Australian Industry has no remedy against dumped goods.

In June 2018, the European Commission modernised their trade defence instruments¹⁰ to avoid these types of outcomes by introducing a minimum target profit of 6% and allowing for higher margins where evidence supported it. In its notice advising the introduction of provisional safeguard measures for a range of steel products including HRS, the European Commission stated that

*It is considered that the level profit below **6 % is insufficient to cover the investments** needed to sustain the activity, as, in the majority of the recent investigations, the Commission has used a level of around **8 % profit** as a sufficient profit level in this sector in order to cover investments¹¹[emphasis added]*

Liberty Steel proposes that the Australian Anti-dumping Commission adopt a similar practice to that of the European Commission for determining the USP in investigations where dumping has been found to affect prices.

Conclusion

Liberty Steel supports the Commission's key findings that the expiration of the measures against Hyundai and Siam would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and material injury that the measures are intended to prevent.

Liberty Steel supports the Panel Member's proposed methodology for the correct or preferable approach to determining if an adjustment based on price comparability; for the physical difference of yield strength between domestic and export models; is warranted and urges the Commission to adopt this approach for all exporters including Tung Ho and TS Steel.

¹⁰ Attachment 1 _ Europe's Trade Defence Instruments Now Stronger And More Effective p3

¹¹ Attachment 2 COMMISSION IMPLEMENTING REGULATION (EU) 2018/1013 of 17 July 2018 imposing provisional safeguard measures with regard to imports of certain steel products



Liberty Steel proposes that the Anti-dumping Commission adopt a similar practice to that of the European Commission and use 8% as a minimum level of profit plus the full cost to make and sell for determining the Unsuppressed Selling Price.

FOR AND ON BEHALF OF THE AUSTRALIAN INDUSTRY APPLICANT



EUROPE'S TRADE DEFENCE INSTRUMENTS NOW STRONGER AND MORE EFFECTIVE

The EU has modernised its' basic anti-dumping and anti-subsidy regulations

The EU's trade defence instruments (TDIs), which shield European industry from the harmful effects of dumped or subsidised imports, are now stronger and more effective and reflect EU values.

Along with the changes on calculating dumping margins introduced in December 2017, this modernisation of the legislation is the first major revamp of the EU's TDI since the establishment of the WTO in 1994.

The EU is committed to an open rules-based trading system. This is now reinforced while ensuring a level playing field, balance and fairness for businesses.



'The EU believes in open and fair trade but we are not naive free traders. We have shown our teeth when we had to by adopting anti-dumping and anti-subsidy measures. And now we have new and improved trade defence rules in our arsenal to face down some of today's challenges in global trade. Make no mistake – we will do whatever it takes to defend European producers and workers when others distort the market or don't play by the rules.'

Jean-Claude Juncker, President of the European Commission, 7 June 2018

Good for EU business

- Anti-dumping investigations will be faster and measures imposed earlier, giving EU industry much needed relief against the damaging effect of unfair imports.
- There is increased transparency and predictability. The Commission will announce its intention to impose new measures three weeks in advance, allowing the market to adjust.
- Small and medium sized enterprises ('SMEs') have easier access to the instruments and will benefit from a new TDI Helpdesk
- Duties paid while expiry reviews are ongoing will be refunded to importers if the review results in the measures being terminated.

Stronger and more effective

- The EU is taking a more assertive stance on trade distortive measures by countries outside the EU by imposing higher duties, if it is necessary for industry and in the EU's interest.
- The harm done to EU industry will be quantified in a way which better reflects the economic reality and which will make it easier for industry to recover.
- EU industry will have access to trade defence instruments without fear of retaliation in other markets. Where companies may face threats of retaliation, the Commission can start an investigation on its own initiative.

Reflecting EU values

- The EU's modernised TDIs reinforce its commitment to an open rules-based trading system while ensuring balance and fairness for all businesses.
- The EU's modernised TDIs now reflect the European Union's commitment to high environmental and social standards.
- Trade Unions, representing the workers whose jobs can be affected by unfair imports, can now participate fully in the process, including making requests for action jointly with EU industry.

1. Good for European business

The Commission will inform interested parties about provisional measures three weeks in advance

The Commission will inform all interested parties three weeks before provisional measures are imposed (pre-disclosure). As a result, all companies will know in advance which exporters will be subject to duties and at which rates. The Commission will also notify interested parties if provisional measures will not be imposed. This information will be made publicly available on DG Trade's webpage <http://trade.ec.europa.eu/tdi/> for each individual investigation launched after 7 June 2018.

During this three week period the Commission will register imports, where warranted, to avoid stockpiling of imports which could undermine the remedial effect of the duties. This will allow for the retroactive collection of duties for that period, if necessary.

Exporting producers and the EU industry concerned will also be provided with their respective dumping / subsidy / injury calculations for provisional measures.

The Commission will review the application of this new rule within two years, as requested by the European Parliament and the Council. The review will establish whether or not pre-disclosure has led to stockpiling and additional injury to the EU industry. If this is the case the period of pre-disclosure shall be reduced from three weeks to two. Otherwise, pre-disclosure shall be lengthened to four weeks.

Investigations will be shorter

Where the EU industry is suffering due to dumped imports the Commission will impose provisional anti-dumping measures within seven or eight months after the initiation of an investigation, instead of the current nine months. The whole

investigation will be shortened by one month to 14 months.

This will provide faster relief for the industry and certainty for the market. The investigative process has been streamlined to maintain the high standards, in terms of data verification, respect of procedural rights, deadlines etc. The key steps and the applicable deadlines are explained on our website.

SME Help Desk

EU small and medium-sized companies (SMEs) will now be able to benefit from streamlined procedures and the support of an SME Helpdesk to make it easier for them to participate in trade defence investigations.

The Commission has created a dedicated web page for SMEs which provides relevant information to help navigate the system, including a guide to filing complaints as well as standard questionnaires for Union producers, importers and users. Currently, most of the information is only available in English but work is underway to provide the information in all EU official languages.

Subject to resources, the Commission will also reach out to business associations in member states, as part of its efforts to raise awareness of the instruments and explain their functioning.

Repayment of duties where expiry reviews result in terminated measures

Where the Commission decides that a measure should not be renewed, anti-dumping or anti-subsidy duties collected while an expiry review is ongoing will be repaid. To get the duties refunded importers must file an application with their competent customs authorities.

2. More effective and stronger

Possibility to impose higher duties

The legislation introduces changes in how the rule known as the 'lesser duty rule' (LDR) is applied. Under WTO rules, measures can be imposed at the level of the dumping or subsidy margin. However, the EU always applied the lesser duty rule. This means measures were always imposed at a level lower than the full extent of dumping or subsidisation, if a lower level, called the 'injury margin', is enough to remove the injury suffered by the EU industry.

The modernisation of the TDI significantly improves how this rule is applied, including how the injury margin is calculated. Changes have been made to three aspects:

Calculating the non-injurious price for the injury margin

The Commission calculates a non-injurious price in order to calculate an injury margin. This is based on the full cost of production and a target profit. Now the cost of production will include costs related to:

- investment, research and development and innovation which, up to now, have not always been included as industries' have had to cut costs in reaction to unfair imports.
- future cost increases reflecting the cost of compliance with multilateral environmental agreements and International Labour Organisation Conventions during the lifetime of TDI measures. This is particularly relevant with regard to Emission Trading Systems.

A minimum target profit of 6% is introduced – based on long-term profitability figures established for the European industry. Higher margins may be possible on a case-by-case basis.

Anti-dumping: Level of duty when significant raw material distortions exist in exporting countries

When determining the level of duties to be imposed in anti-dumping cases, the Commission can pay regard to important distortions in the exporting market for relevant raw materials. Under certain conditions set out hereunder, the Commission may consider it necessary to impose measures at the level of the dumping margin in order to remove injury:

- the complaint lodged by the Union industry contains sufficient evidence of 'significant raw material distortions'. The notice of initiation will indicate whether or not the scope of the investigation covers raw material distortions.
- distortions must concern one raw material, whether unprocessed or processed, including energy, that account individually for more than 17% of the cost of production.
- the price of the distorted raw material needs to be significantly lower as compared to prices in the representative international markets.
- the Commission must determine that such a level of measures is in line with the interest of the Union. For this purpose the Commission will actively seek information from interested parties and examine all pertinent information such as:
 - spare capacity in the exporting country
 - competition for raw materials and
 - the effect on supply chains for Union companies.

Where the higher level is not in the Union interest, the injury margin will be calculated according to the rules that apply in cases without raw material distortions.

The new rules provide a list of relevant raw material distortions. The type of distortions listed includes, for example, instances where exporting countries create obstacles to the export of raw materials in order to keep them for further manufacturing. Such activities are particularly problematic if this type of unfair trade is combined with dumping practices of products made with the same raw materials. The European industry suffers twice:

- first from being prevented from getting raw materials at the same conditions as their competitors
- second by the dumping of the product which incorporates those raw materials.

In order to check whether an exporting country operates relevant distortions, reference can be made to a database maintained by the OECD. An update of this database including the years 2015-2017 is currently underway. EU industry can also invoke a distortion in an exporting country, if it is not identified in the database, provided it falls under the list of relevant distortions. The Commission can extend this list by delegated act when the OECD recognises new forms of distortions.

The lesser-duty rule in anti-subsidy cases

Anti-subsidy measures will fully offset the subsidies that an exporter has received, unless it is against the overall interest of the EU to do so. This means the EU can tackle the serious unfair trade practice of subsidised imports more rigorously.

Better response to threats of retaliation

European industry should not be prevented, for example through pressure from foreign governments, from using TDI whenever they are exposed to injurious dumping / subsidisation. Where there might be a risk of such threats, the Commission can launch investigations on its own initiative, i.e. without a complaint lodged by industry. However, once the case is opened, the Commission will ask the industry to cooperate with the investigation.

TDI measures can now be applied in the continental shelf and exclusive economic zones of Member States

In future cases, trade defence measures can also apply to dumped or subsidised products imported and used on the Continental Shelf where the consumption of the product concerned is significant. This covers, for example, oil rigs or off-shore wind parks. Up to now measures were not extended to cover these zones. Regulations imposing anti-dumping / anti-subsidy measures will specify if these zones are covered. A specific customs tool, currently being discussed with customs experts from Member States, will set out the rules on how the collection of TDI duties in the continental shelf / exclusive economic zone of Member States will work.

TDI measures will continue to apply automatically to the territorial waters, consisting of twelve nautical miles off shore of a Member State, comprising part of the EU's customs territory.

3. Reflecting EU values

Better rules on the acceptance of price undertakings from exporters

The Commission will only accept 'undertakings', i.e. where an exporting producer gives a commitment to raise its export prices as an alternative to paying duties, where the price rise eliminates the injurious effect of the dumping or subsidisation.

Exporting producers must submit a meaningful non-confidential version of any undertaking offer and interested parties will have the opportunity to comment on such offers before the Commission decides on the issue.

The Commission can reject an undertaking for reasons of general policy. This includes the consideration, whether the exporting country has not ratified one or more important environmental and labour agreements.

Commitment to social and environmental standards

The European Union is committed to high social and environmental standards and is a strong supporter of multilateral agreements in this area. For the first time, these standards become part of the EU's trade defence instruments in three concrete ways

- The calculation of the injury margin will better reflect the cost of social and environmental standards within the European Union. The cost of production also includes costs that EU producers incur when complying with multilateral environmental agreements and with important International Labour Organisation conventions. The new provision not only allows for taking into account the actual costs incurred by EU manufacturers but also future cost increases during the lifetime of TDI measures resulting from compliance with these standards. This is particularly relevant with regard to Emission Trading Systems.
- Better rules on the acceptance of price undertakings from exporters emphasise that an undertaking can be rejected for reasons of general policy, including if the exporting country has not ratified one or more important environmental and labour agreements.
- When circumstances change in exporting countries relating to social and environmental standards the Commission can initiate interim reviews. For instance, where a country withdraws from an agreement, such as the Paris climate agreement, an interim review of the measures could be appropriate and undertakings can be terminated.

The Commission will report about these three specific elements in a dedicated chapter of the annual TDI report.

Trade unions can be interested parties in investigations

For the first time, trade unions can be interested parties in investigations. This means they will have full access to the non-confidential file as well as the right to comment. They can also jointly prepare, with the Union industry, applications to launch anti-dumping or anti-subsidy investigations. However, the European industry can decide independently to withdraw any such application. This exception to the involvement of trade unions is to make it possible to keep to tight deadlines.

Continued commitment to uphold procedural rights

The European Union visibly reinforces its commitment to uphold procedural rights by anchoring the institution of the Hearing Officer firmly in the relevant legislation.

Improved reporting on the EUs trade defence activity

The Commission report to the European Parliament and the Council on the EU's trade defence activities will be more comprehensive and now incorporate information on TDI investigations and measures taken by countries outside the EU. Currently, this is the subject of a separate report. The report will also include information on the activities of the Hearing Officer, the SME Helpdesk, as well as how TDI cases have addressed third countries' compliance with international social and environmental legislation.

New procedures to follow before issuing guidelines on TDIs

The Commission will carry out a public consultation before adopting any document that provides guidance to interested parties on the application of the Basic Regulations. The European Parliament and Council may express their views as well during the consultation.



'Finally, this long-awaited reform can be rolled out and put into action. European companies have been looking for a modern set of rules. I am very confident that this provides us with the necessary tools to efficiently defend our industries from unfair trade practices. We believe in open, rules-based trade. Now, we are better equipped to stand up for our companies if other countries don't stick to the rules.'

Cecilia Malmström, European Commissioner for Trade, 7 June 2018

COMMISSION IMPLEMENTING REGULATION (EU) 2018/1013**of 17 July 2018****imposing provisional safeguard measures with regard to imports of certain steel products**

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2015/478 of the European Parliament and of the Council of 11 March 2015 ⁽¹⁾, and in particular Articles 5 and 7 thereof,

Having regard to Regulation (EU) 2015/755 of the European Parliament and of the Council of 11 March 2015 ⁽²⁾, and in particular Articles 3 and 4 thereof,

After having consulted the Committee on Safeguards established under Article 3(3) of Regulation (EU) 2015/478 and Article 22(3) of Regulation (EU) 2015/755 respectively,

Whereas:

I. BACKGROUND

- (1) On 26 March 2018, the Commission published a Notice of Initiation of a safeguard investigation concerning imports of 26 steel product categories (2018/C 111/10) ⁽³⁾ in the *Official Journal of the European Union*. The Commission decided to initiate the investigation in the light of sufficient evidence that imports of those products might cause or threaten to cause serious injury to the Union producers concerned.
- (2) On 28 June, the Commission also published a Notice by which the investigation was extended to two additional product categories ⁽⁴⁾.
- (3) The information available to the Commission from the steel prior-surveillance mechanism in place ⁽⁵⁾ and from Union industry sources showed that an increasing trend of imports of these product categories and the prevailing menacing economic and trade conditions, including the situation of the Union steel industry, justified an in-depth examination.
- (4) Furthermore, due to the measures against imports of steel adopted by the United States of America ('U.S.') under Section 232 of the Trade Expansion Act of 1962 ('Section 232'), there was a high risk of further increase of imports resulting from trade diversion.
- (5) These circumstances, in a context of persistent worldwide overcapacities, may jeopardise the Union steel industry, which is still vulnerable to a likely imminent increase of imports and recovering from the damage caused by unfair trade practices, as the substantial number of trade defence measures taken worldwide on steel products in the recent past prove.
- (6) On 11 April 2018, the Commission issued a 'Note to the File' containing key import statistics and available injury indicators. In relation to this 'Note to the File', the Commission received 41 submissions from third countries, national associations and individual steel companies
- (7) Several interested parties have claimed that the Commission failed to disclose the evidence on which the initiation of the safeguard investigation was based in an adequate and timely manner. It was claimed that by failing to do this, interested parties were not allowed to fully exercise their rights of defence. More precisely, several interested parties claimed that the 'Note to the File' made available on 11 April 2018 did not contain data on Union sales, Union exports, Union consumption, or total Union production.

⁽¹⁾ OJ L 83, 27.3.2015, p. 16.

⁽²⁾ OJ L 123, 19.5.2015, p. 33.

⁽³⁾ OJ C 111, 26.3.2018, p. 29.

⁽⁴⁾ OJ C 225, 28.6.2018, p. 54.

⁽⁵⁾ Prior surveillance measures were adopted in April 2018 through the Commission Implementing Regulation (EU) 2016/670 of 28 April 2016 introducing prior Union surveillance of imports of certain iron and steel products originating in certain third countries (OJ L 115, 29.4.2016, p. 37).

- (8) Contrary to these claims, the 'Note to the File' did contain data on Union sales, Union consumption, and total Union production. Furthermore, the Commission considers that, in addition, the main elements and evidence available were adequately summarised both in the Notice of Initiation that was published in the *Official Journal of the European Union* and the notification of the investigation to the WTO pursuant to Article 12.1(a) of the WTO Safeguard Agreement.
- (9) The Commission therefore considers that it has fulfilled its legal obligations to adequately protect the rights of defence of interested parties. In any event, interested parties still have the opportunity to exercise their rights during the remainder of the investigation.
- (10) In order to obtain the information necessary to carry out an in-depth assessment, the Commission sent questionnaires to known EU producers and to any exporting producer, importer, and user of the products under investigation that so requested within the deadlines stipulated in the Notice of Initiation. These parties, like third countries, were also invited to make any relevant submissions. The Commission has received 222 replies to questionnaires and 74 submissions.

II. PRODUCT CONCERNED AND LIKE OR DIRECTLY COMPETING PRODUCT

- (11) The Commission initiated the safeguard investigation on 26 steel product categories imported into the EU, and on 28 June its scope was extended by 2 additional product categories by means of a notice amending the Notice of Initiation ⁽¹⁾. The 28 product categories ('the product concerned' or the 'product categories concerned') are all covered by the steel surveillance mechanism introduced by the Commission in May 2016. They are also subject to the US tariff measures under Section 232. The product categories concerned, together with the CN codes under which these products are currently classified, are listed in Annex I.
- (12) In this preliminary assessment, the Commission finds that the 28 product categories produced by the Union producers (hereinafter 'the like product' or 'the like product categories') are like or directly competing with the product categories concerned. Both the Union-produced and the imported products concerned have the same basic physical, technical and chemical characteristics; they have the same uses, and price and quality information on them is readily available; they are also sold via similar or identical sales channels to customer who purchase or may purchase them from both domestic as well as alternatively from foreign exporters. Accordingly, there is strong competition between the product categories concerned and those produced by the Union producers under the corresponding categories.
- (13) The Commission has also found in this preliminary analysis that there is an important interrelation and strong competition between products classified in different product categories and also between products at different production stages within certain categories as some of the categories contain the main raw or input material to produce other products in other product categories.
- (14) Some examples illustrate this interrelation and competition within and between product categories. For instance, hot rolled wide strips are produced from slabs and rolled into coils or produced flat on quarto mills. By cutting the strip to length, sheets are produced. Narrow strip is produced either directly or by slitting hot-rolled wide strip. Hot rolled flat products are also used in the manufacture of pipes and tubes for the petrochemical industry and cold rolled flat products are subsequently used by welded tube manufacturers. A large part of the hot rolled wide strip that is produced is further processed to produce cold rolled strip, which is thinner and has a superior surface finish. A significant proportion of the cold rolled products are metallically coated, with tin or chrome for the can industry or with zinc ⁽²⁾.
- (15) Many producers in the Union are active in the production of most the above mentioned products. For example, Arcelor Mittal not only produces hot rolled and cold rolled sheets and strips but also coats several steel products and produces plates. Similarly, companies like Voest Alpine and Tata Steel produce hot rolled and cold rolled sheets and strips and also coated steel products made of these products.
- (16) Furthermore, as a consequence, given this level of interrelation, competitive pressure can easily be shifted from one product to the other. For instance, if trade defence measures are imposed on one product, e.g. steel coils, that product may be further transformed in the same country and exported under a different form to avoid the additional measures and still compete with domestic products. It is also not excluded that third countries import some of these products at low cost and transform them before re-exporting them to the Union.

⁽¹⁾ OJ C 225, 28.6.2018, p. 54.

⁽²⁾ Case No COMP/ECSC.1351 Usinor/Arbed/Aceralia and Case No COMP/M.4137, Mittal/Arcelor.

- (17) Because of these interrelations and interconnections, and given the fact that – as will be explained below – the potential trade diversion resulting from the U.S. Section 232 measures applies to all product categories on account that these measures are applied horizontally to all steel products, without distinction of their shape, size of composition, the analysis for the purpose of the provisional determination has been carried out both globally for all 28 product categories, as the product concerned (i.e. steel in various shapes and forms) and also at individual level for each product category ⁽¹⁾.

III. THE UNION PRODUCERS

- (18) Most of the Union's producers are members of the European Confederation of the Iron and Steel Industry ('Eurofer') or, to the extent the products are pipes and tubes, members of European Steel Tube Association ('ESTA'). These two industry associations represent more than 95 % of Union steel production. Their members are located in almost all Member States.
- (19) On behalf of their members, these industry associations have informed the Commission that they support the opening of the safeguard investigation, as well as the adoption of measures to also address the trade diversion resulting from the Section 232 measures that seriously disrupts the steel market which has not yet fully recovered from the steel crisis.

IV. INCREASE IN IMPORTS

- (20) Based on the information from Eurostat, the prior steel surveillance mechanism, as well as information submitted by the Union industry, the Commission has carried out a preliminary analysis of the increase in imports of the products concerned over the period 2013-2017. The Commission has also examined the evolution of imports during the first quarter of 2018 in order to confirm the recent increase in imports.
- (21) The total imports of the products concerned have developed as follows:

	2013	2014	2015	2016	2017
imports (000 tonnes)	18 861	22 437	27 164	29 778	30 573
<i>index 2013 = 100</i>	100	119	144	158	162
market shares	12,7 %	14,4 %	16,9 %	17,9 %	18,0 %

Source: Eurostat

- (22) In overall terms, imports of the 28 product categories concerned, taken altogether, increased in absolute terms by 62 % over the period 2013-2017. The increase of imports was especially marked until 2016. Subsequently, imports continued to increase and remained at a very high level.
- (23) Imports for the vast majority of the individual product categories covered by the investigation also showed an increase in absolute terms over the last five years. For example, the imports of the largest categories in terms of imports (product categories 1, 4, and 7) have increased by 45 %, 168 %, and 78 % respectively.
- (24) There was however not an increase for 5 product categories, namely products 10, 11, 19, 24, and 27. The Commission therefore considers that these product categories should at this stage be excluded from the scope of the provisional measures. The Commission, nevertheless, reserves the right to include these 5 product categories in the scope of the definitive measures and to this effect will continue monitoring the imports within these categories. The evolution of imports for each product category is presented in Annex II.
- (25) In addition to the exclusion, at this stage, of the abovementioned product categories, the Commission has also considered the exclusion of certain countries from the scope of the measures in line with the conclusions in recital (121). Accordingly, the Commission has excluded the imports of these product categories from these aforementioned countries from the rest of its preliminary analysis and reviewed the imports' evolution.

⁽¹⁾ In particular, see Section IV and Section VI 1 and 2.

- (26) On this basis, the imports of the products concerned by this preliminary determination have developed as follows:

	2013	2014	2015	2016	2017
imports (000 tonnes)	17 367	20 764	25 556	28 174	29 122
<i>index 2013 = 100</i>	100	120	147	162	168
market shares	12,1 %	13,8 %	16,5 %	17,5 %	17,8 %

Source: Eurostat

- (27) Imports increased in absolute terms by 68 % during the period 2013-2017, with market shares increasing from 12,1 % to 17,80 %. The most significant increase took place in the period 2013-2016, but imports continued to increase and remained at a high level in 2017.
- (28) The trend of increasing imports continues in 2018. When comparing the first quarter of 2018 with the first quarter of 2017, the overall import increase amounts to 10 %. For 9 product categories, the increase is more than 20 % and for one of those categories (category 13) the increase is more than 100 %. Moreover, this increase took place even before the Section 232 measures entered into force.
- (29) The Commission therefore concludes that there has been a sudden, steep, and significant increase of imports in absolute terms for 23 product categories. In addition, the increase of imports continues in the first quarter of 2018 and it is expected to be even more significant in view of the expected trade diversion from the Section 232 measures.

V. UNFORESEEN DEVELOPMENTS

- (30) The Commission has preliminarily determined that the above-mentioned increase in imports of steel products in the Union has been the result of unforeseen developments that finds its source in a number of factors establishing and aggravating imbalances in the international trade of the products concerned.
- (31) First of all, the nominal global steelmaking capacity has more than doubled since 2000, from a level of 1,05 billion tonnes in 2000 to 2,29 billion tonnes in 2016 and has remained at a very high level in 2017 (2,27 billion tonnes) ⁽¹⁾. In addition, actual global steel production in 2016 (1,6 billion tonnes) was still 100 million tonnes higher than global steel demand (1,5 billion tonnes). Consequently, there has been over the last years a major gap between nominal global capacity and production and between production and demand, generating an unprecedented overcapacity in the global steel market which has persisted despite the measures adopted to narrow it. Moreover, looking forward, whereas global production in 2017 increased by more than 5 % due to an economic recovery, global steel demand in 2018 will show only moderate growth with further deceleration predicted for 2019. There was a sign of recovery in 2017, but important risks remain.
- (32) The steel firms continue to be financially vulnerable since, as mentioned above, there are persisting structural imbalances in the steel sector. These imbalances are accentuated by distortive subsidies and government support measures ⁽²⁾. Given the important fixed costs in the steel sector, many steel producers, notably in countries where the State distorts the normal play of market forces, kept capacity utilisation at high rates and flooded third country markets with their products at low prices when they could not be absorbed by domestic consumption. This has resulted in increasing imports in the EU and overall price depression. Import prices have in general undercut Union industry prices in 2017, based on an average price comparison for each product category. Such an average price comparison does not necessarily reflect all the specificities which may have an impact on comparability, but nevertheless gives a good indication of the general price level of imports as compared to Union prices. Undercutting was established for 17 product categories, with ranges between 1,2 % and 23 %.
- (33) Secondly, the above effect has been exacerbated by trade-restrictive practices in third country markets. Indeed, since 2014/2015, in reaction to the above mentioned oversupply of steel and the market-distorting practices,

⁽¹⁾ Cf. reports from the 83rd and 84th OECD Steel Committee, available at <http://www.oecd.org/sti/ind/steel.htm>

⁽²⁾ Idem, 83rd report.

several countries have begun to make greater use of trade policy and trade defence instruments in the steel sector with a view to protecting their domestic producers. Mexico, South Africa, India and Turkey have applied import tariffs' increases ranging from 2,5 % to 40 % for a series of steel products including inter alia: hot rolled and cold rolled steel, flat steel products like strips, and also rebars. These products were typically imported in increasing quantities over the period of investigation. Furthermore, third countries continued throughout 2017 to impose trade restrictive measures: some countries introduced minimum import prices (India), some imposed mandatory national standards for steel (Indonesia) and others imposed local content requirements, including through government procurement (U.S.).

- (34) In addition, recourse to trade defence instruments has steadily increased. Based on WTO statistics, whereas during 2011-2013 on average around 77 steel-related investigations had been initiated per year, during 2015-2016 this average increased to 117. In February 2018, the U.S. had 169 anti-dumping and countervailing duty orders in place on steel, as well as 25 ongoing investigations that could lead to an even more restrictive picture for imports of steel into the U.S. ⁽¹⁾ As the U.S. is one of the world's largest steel importing countries – representing around 13,1 % of the world steel imports (in 2016) – the impact of such a large number of trade remedies has been strongly felt globally.
- (35) Third, in the context of the prevailing persistent worldwide overcapacity, the illegal and restrictive U.S. Section 232 measures, given their level and scope, are likely to cause substantial trade diversion of steel products into the Union. The U.S. have calculated that the imposition of a single across-product tariff under the Section 232 measures with almost no country exclusion should decrease imports by approximately 13 million tonnes – corresponding to 7 % of Union consumption ⁽²⁾. The Union market is generally a very attractive market for steel products both in terms of demand and prices. Some of the main exporters to the US are also traditional steel suppliers to the Union and there is no doubt that these countries, as well as others whose exports and production will be affected by the U.S. measures and the foreseeable trade diversion cascade, will redirect their exports to the Union. Even a partial diversion of the abovementioned trade flows into the Union will unavoidably result in a new price depression and undercutting on the EU market, bringing price down to levels comparable to those of 2016, with significant negative consequences on the profitability of the Union steel industry. It should finally be noted that the additional import increase which is liable to further deteriorate the economic situation of the Union steel industry might especially originate from countries currently not subject to anti-dumping/countervailing duty measures.
- (36) Consequently, the abovementioned unforeseen developments have lead and will further lead to a clear increase of steel imports into the Union.

VI. THREAT OF SERIOUS INJURY

1. Global situation of the Union steel industry

- (37) In order to formulate its preliminary determination as to whether there is evidence of serious injury or threat of serious injury to the Union industry for the product concerned under assessment, the Commission, in line with Article 9 of Regulation 2015/478 and Article 6 of Regulation 2015/755, has examined the trends of consumption, production, capacity utilisation, sales, market share, prices, profitability, stocks, Return On Capital Employed (ROCE), cash flow and employment for the product concerned for the years 2013 to 2017 (pending the collection of 2018 data).
- (38) This analysis has been carried out globally and also individually for the 23 product categories showing an increase of import volumes ('the products/product categories under assessment'). As explained in Section II above, the Commission considers such a global and comprehensive analysis adequate in this investigation, given the interrelation, interconnection, and the level of competition between the different products from a demand and supply point of view.

⁽¹⁾ Press release U.S. Secretary Ross, Department of Commerce, <https://www.commerce.gov/news/press-releases/2018/02/secretary-ross-releases-steel-and-aluminum-232-reports-coordination>

⁽²⁾ Report by U.S. Department of Commerce under Section 232, https://www.commerce.gov/sites/commerce.gov/files/the_effect_of_imports_of_steel_on_the_national_security_-_with_redactions_-_20180111.pdf

- (39) When looking at the overall situation, the Union consumption, sales of Union producers and the corresponding market share developed as follows:

(000 tonnes)	2013	2014	2015	2016	2017
Consumption	144 908	152 146	157 236	163 100	166 244
<i>index 2013 = 100</i>	100	105	109	113	115
Domestic sales	125 808	129 261	129 542	132 717	134 542
<i>index 2013 = 100</i>	100	103	103	105	107
market shares (%)	86,8 %	85,0 %	82,4 %	81,4 %	80,9 %

Source: Eurostat and industry data

- (40) The consumption of the products under assessment increased consistently every year during the period 2013-2017, and by 15 % overall. The sales of Union producers also increased, but to a much lesser extent than Union consumption, i.e. by 7 % only. Consequently, the Union producers could not benefit from the increasing Union demand and lost market shares, going from 86,8 % to 80,9 %. It should be recalled that during the same period imports increased by 68 %.
- (41) On the basis of the questionnaire replies received from the Union producers, production and production capacity developed as follows:

000 tonnes	2013	2014	2015	2016	2017
EU production	184 912	190 687	192 493	194 369	200 650
<i>index 2013 = 100</i>	100	103	104	105	109
production capacity	257 331	257 138	258 056	260 171	265 353
<i>index 2013 = 100</i>	100	100	100	101	103
capacity utilisation (%)	71,9 %	74,2 %	74,6 %	74,7 %	75,6 %

Source: Industry data

- (42) Production capacity increased by 3 % during the period 2013-2017, but less than the production level which increased by 9 %. As a result, the capacity utilisation rate increased from 72 % to 76 %.
- (43) The stocks held by the cooperating companies increased overall by 20 % in the period 2013-2017.

000 tonnes	2013	2014	2015	2016	2017
Stocks	11 006	11 896	12 391	12 117	13 222
<i>index 2013 = 100</i>	100	108	113	110	120

Source: questionnaire replies

- (44) Unit sales prices, profitability and cash flow of the Union producers developed as follows:

	2013	2014	2015	2016	2017
Unit sales prices (EUR/tonne)	673,5	652,8	616,9	572,9	681,5
<i>index 2013 = 100</i>	100	97	92	85	101

	2013	2014	2015	2016	2017
Profitability	– 1,0 %	0,9 %	0,9 %	2,2 %	6,2 %
Cash flow (mio EUR)	3 133	4 975	6 519	5 386	6 141
<i>index 2013 = 100</i>	100	159	208	172	196

Source: questionnaire replies

- (45) In the period 2013-2016 there was a significant price depression on the Union market: Unit sales prices decreased by 15 %. It should be recalled that imports also increased significantly during this period. The average unit sales price recovered however in 2017 and reached a level comparable to 2013. Profitability overall remained at a very low level during the period 2013-2016. Despite a significant decrease in prices, the Union industry could nevertheless reduce its cost of production in 2016 to such an extent that it managed to make a small level of profit of 2,2 %. The situation temporarily recovered in 2017. Sales prices increased by almost 20 % between 2016 and 2017 and reached their 2013 level. The Union industry achieved a level of profit of 6,2 % since cost of production (raw material), even if increasing, remained lower than in 2013. The overall cash flow position of the Union industry increased by approximately 60 %.
- (46) In terms of employment, over the 5-year period, the Union producers of the product categories under assessment lost almost 10 000 jobs.

	2013	2014	2015	2016	2017
employment (FTE)	189 265	183 470	182 136	182 162	181 303
<i>index 2013 = 100</i>	100	97	96	96	96

Source: questionnaire replies

2. Situation at the level of individual product categories

- (47) In addition to the global analysis of the situation for the product concerned overall, which the Commission considers to be the appropriate standpoint for the appraisal of the necessity of safeguard measures in this investigation, the Commission has also assessed the situation at the level of the individual product categories in order to confirm the above trends at a disaggregated level.
- (48) When looking at individual product categories, the situation is more contrasted but generally shows the same trends. The economic indicators are provided individually and by product categories in Annex III.
- (49) The Union consumption for all but two product categories increased in the last five years. While this increase remained modest for some individual products, with a minimum increase of 2 %, it was much more marked for others, with a maximum increase of 169 %.
- (50) Sales volumes were generally stable in the period 2013-2017 or, in some cases, slightly increased but, except for three product categories, they did not increase as much as EU consumption. As a result, there was a decrease of market shares over the five year period for all but 3 products.
- (51) Production levels generally increased for 18 out of 23 of the individual products, as well as capacity utilisation rates.
- (52) In terms of prices, there was a significant price decrease for each product (except for one product that was subject to anti-dumping duties in the form of a minimum import price) in the period 2013-2016. Prices recovered in 2017, given a general recovery of the steel market but also as a consequence of the various trade defence measures taken against unfair pricing behaviour and subsidised imports. For 16 products the price level remained lower in 2017 than in 2013. It should be noted that average import price levels were almost systematically lower than Union prices for all years, and for all product categories.
- (53) As far as profit is concerned, all product categories were sold at a loss or at a much reduced profit until 2016. Only 7 products could recover to a level of profit above 6 % in 2017. These products are significant in terms of

EU production volume and six of them are currently subject to (recent) anti-dumping or countervailing duty measures. Note that these measures concern only some countries of origin. All other products remained either loss making (3 products) or only close to break-even (13 products). It is considered that the level profit below 6 % is insufficient to cover the investments needed to sustain the activity, as, in the majority of the recent investigations, the Commission has used a level of around 8 % profit as a sufficient profit level in this sector in order to cover investments. As for cash flow, for half of the products the cash flow deteriorated in 2013-2017 and for 6 products the cash flow was even negative in 2017. The return on capital employed (ROCE) remained low in the period 2013-2016, but subsequently improved for a large majority of the product categories, even though for 5 products the ROCE was still negative in 2017.

- (54) In terms of stocks, the stocks increased for 17 product categories. Only the stocks of 5 product categories decreased and for one product category it remained at the same level during the period.
- (55) The above analysis corroborates that the situation of the Union steel industry deteriorated significantly in the period 2013-2016. This materialised by a decrease in market shares, and by a significant price depression which prevented the industry from benefiting from lower raw material costs. These trends existed both at a global and individual product level. The situation partially recovered in 2017. While many product categories are still below a level of sustainable profit, some have improved, most likely as a result of the recent imposition of anti-dumping and anti-subsidy measures. Globally, and for individual product categories, it is therefore considered that the Union industry is still in a fragile situation and vulnerable to further increase in imports, in particular if imports from countries subject to trade defence measures are replaced by other imports diverted from the U.S. market as a result of the Section 232 action.
- (56) This is, for example, typically the case for product categories 1, 2 and 4, which are important in terms of Union demand but also because these product categories (in particular categories 1 and 2) are used as raw material to produce other steel products. For product categories 1, 2 and 4, the financial situation was negative in 2016, but became positive in 2017 following the imposition of anti-dumping and anti-subsidy measures against a number of countries like, amongst others, China and Russia. Imports from these countries have however been recently and partially replaced by imports from India, Korea and Turkey, the two latter being also significant supplier to the U.S. In the first quarter of 2018, i.e. before the imposition of the measures in the U.S., Union imports have already increased for product category 1 as compared to the first quarter 2017, and this increase is mainly due to imports from Turkey.
- (57) It is likely that a further increase in steel imports in the Union would prevent the Union industry, which has not yet fully recovered, to benefit from the positive effect of the recent trade defence measures.

3. Threat of serious injury

- (58) In its Steel Communication of March 2016 ⁽¹⁾, the Commission concluded that the Union steel industry was facing a number of serious challenges, fuelled by global overcapacity, a dramatic increase of global exports, and an unprecedented wave of unfair trading practices.
- (59) In parallel, in order to remedy the injury caused by unfair trade imports, the Union has imposed a number of anti-dumping and anti-subsidy measures against imports of steel products. In total, there are currently no less than 19 anti-dumping or anti-subsidy measures against the unfairly traded imports of 14 product categories under investigation from various countries. During the period under investigation, i.e. 2013-2017, 13 new investigations determined that the EU steel industry suffered (or in one case was threatened to suffer) from material injury caused by unfair trade practices.
- (60) As noted in recital (55), the Union industry is still in a fragile situation and vulnerable to a further increase in imports. The recent U.S. decision not to exclude EU exports from the scope of Section 232 measures will likely reduce the Union producers' ability to export their products to the U.S. and make their situation even more vulnerable.
- (61) Steel imports have increased significantly, remaining at high levels in 2017. The further increase of imports in 2018 – in particular from those countries or exporters not subject to trade defence measures – is likely to prevent the industry from a full recovery and from benefiting from these measures. The Union steel industry is indeed considered to be still vulnerable to further increases of imports.

⁽¹⁾ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee, the Committee of the Regions, and the European Investment Bank: Steel: Preserving sustainable jobs and growth in Europe, COM(2016) 155 final, 16.3.2016.

- (62) In the absence of provisional safeguard measures, it is likely that the situation will develop into actual serious injury in the foreseeable future.
- (63) In this context, pursuant to Article 9(2) of Regulation 2015/478 and Article 6(3) of Regulation 2015/755, the Commission has examined the rate of increase of the exports to the Union and the likelihood that available capacity is used to export into the Union.
- (64) First, as concluded above, imports into the Union increased substantially in the period 2013-2017, i.e. by 68 % globally. While the increase was especially marked until 2016, imports continued to increase in the subsequent period, albeit at a slower pace. As highlighted in recitals (37) and (82) regarding critical circumstances – imports increased again significantly, by almost 10 %, in the first quarter of 2018. The rate of increase of imports is therefore significant.
- (65) Second, in a situation of global overcapacity in various countries, it is expected that the restrictive U.S. Section 232 measures, given their level and scope, are likely to cause trade diversion of steel products in the Union.
- (66) The U.S. have announced their intention to decrease imports by approximately 13 million tonnes and, as a result, have imposed in March 2018 an additional import duty of 25 % against imports of a very large number of steel products. The volume of steel that will no longer be exported to the U.S. will unavoidably be diverted to other third countries.
- (67) Some of the main exporters to the US are also traditional steel suppliers to the Union. It is more than likely that these countries, as well as others, will to a large extent be willing to redirect their exports to the Union. The Union market is indeed generally an attractive market for steel products both in terms of demand and prices. In fact, the EU is, after China, but before the U.S., one of the main markets for steel, where demand has increased in the last years and prices have also now recovered.
- (68) In this context, a significant increase of supply on the Union market caused by an influx of imports will result in a general downward price pressure, resulting in price levels comparable to 2016 with significant negative consequences on the profitability of the Union steel industry.

4. Conclusions

- (69) Under these circumstances, and based on the above, it is preliminary concluded that, although the Union steel industry has partially recovered for some product categories in 2017, notably due to trade defence measures, for the bulk of product categories under assessment the financial situation is still well below sustainable levels, which makes the Union industry still vulnerable to another surge of imports. Accordingly, the Commission concludes that the Union steel industry is in a situation of threat of serious injury for the 23 product categories under assessment.

VII. CAUSATION

1. Increase of imports

- (70) The Commission has made a preliminary determination that there is a causal link between increased imports of the product under assessment on the one hand and a threat of serious injury on the other hand, on the following basis.
- (71) It is first recalled that the products produced by the Union producers are like or directly competing with the products concerned. They have the same basic characteristics, the same uses and are sold via similar or identical sales channels and strongly compete on price.
- (72) As explained in Sections IV and VI, the Union producers have suffered in terms of loss of market share and significant price pressure resulting in a negative or unsustainable level of profit. For some products, even if the producers have recovered, serious injury appears to be imminent.
- (73) In the period 2013-2017, imports of the product concerned increased significantly and took away Union market shares based on lower than EU producers' price levels. Indeed, the market share of imports, overall, grew from 12,2 % to 17,6 % and import prices remained almost systematically lower than the Union sales prices for each individual product.

- (74) The causal link between the increased imports and the situation of the Union producers was especially marked in the period 2013-2016, when low priced imports peaked (+ 62 %) and EU producers' prices fell by 15 %. For category 13, the decrease in prices amounted even to 20 % whereas for categories 1 and 3 they were 19 % and 18 % respectively. As a result, Union producers of the like products were either in a loss making situation or just close to break even. In the year 2017, imports remained at a high level and continued to undercut prices, despite a general price increase. EU prices recovered, but not sufficiently for a number of products which were still sold at a loss or reduced profit.
- (75) Even if profit recovered for some product categories, their situation is still vulnerable. Indeed, based on previous years' developments, these product categories are particularly sensitive to price pressure, and any further increase of imports at low prices would have a significant negative impact on their situation.
- (76) In this context, it is considered that the restrictive measures taken by the U.S. pursuant to Section 232 of the Trade Expansion Act, given their level and scope, are likely to cause imminent serious injury to Union producers.
- (77) The Commission therefore provisionally concludes that, in relation to the 23 product categories under assessment, there is a causal link between the increase in imports, the pressure on the Union steel market price and the threat of serious injury suffered by Union producers.

2. Other known factors

- (78) To ensure that the serious injury is not attributable to factors other than the increase in imports, the Commission has carried out a preliminary analysis to determine whether the other factors may have contributed to the serious injury suffered by the Union producers.
- (79) The global overcapacity was found to have played a role in the sense that it boosted cheap imports into the Union. Consumption for the steel products concerned increased and could therefore not weaken the causal link.
- (80) The Commission also considered the attribution of serious injury due to imports of the products concerned from members of the European Economic Area (EEA). As a result of the EEA Agreement between the Union and its Member States, on the one hand, and members of the EEA (Norway, Iceland, and Liechtenstein), on the other hand, the Union has established a close economic integration with the markets of EEA countries, as well as the industries of the products concerned. The industry in those markets is mature and saturated, due to which it is considered that the exclusion of products originating in the members of the EEA from the safeguard measures will have little (if no) impact on the import levels of the products. Indeed, and while the imports from these countries have indeed contributed for some product categories to an increase in imports (overall imports from these countries show an increase of approximately 9 %), the share of those imports in the total imports is limited (EEA share in imports is about 1,5 %, with a corresponding market share of 0,3 % in total). In addition, EEA members are traditionally minor suppliers of the product concerned to the U.S., which means that the risk of trade diversion has preliminarily been determined to also be limited. Having, therefore, regard to the traditionally minor supplies to the U.S., the maturity of the industry in EEA markets, and the related limited risk of trade diversion stemming therefrom, the Commission considers that imports of the products concerned from EEA members may only have very marginally, if at all contributed to the threat of serious injury.
- (81) Consequently, the Commission has not identified other factors that would weaken the causal link between the increase in imports and the serious injury to the Union producers. Nevertheless, a more detailed examination of all other factors that have or may have contributed to the injury will be undertaken in the remainder of the investigation.

VIII. CRITICAL SITUATION

- (82) As indicated above, Union steel producers are globally in a situation of threat of injury and serious injury is clearly imminent. For some individual product categories, there are already indications pointing towards serious injury. A further increase of imports will likely have significant adverse effects on the economic situation of the industry overall.
- (83) The Commission has examined whether critical circumstances exist in which delay would cause damage which it would be difficult to repair. In particular it was examined whether imports have continued to increase in the most recent period.

- (84) Based on a comparison between imports of steel products in the first quarter 2018 and the first quarter 2017, it appears that for 18 of the 23 product categories imports increased by 26 %. This increase of imports is significantly more important than that experienced in the period 2016-2017, which was around 2 %.
- (85) The 25 % tariffs under Section 232 on steel products were introduced on 23 March 2018. It is at this stage not possible to assess the full effect of the U.S. measures in terms of trade diversion. The increase of imports into the Union in the first quarter 2018 could however be seen as an anticipation of their effects and, therefore, give a good indication of what could be the potential future development of Union imports after the US measures have been imposed.
- (86) On 30 May 2018, the U.S. also decided that Section 232 measures should be enforced against the Union, Mexico and Canada. The Commission considers that this is a further critical element since it would not only restrict Union exports but also increase the risk of trade diversion from the other two important steel producing countries.
- (87) Given the vulnerable situation of the industry, and in view of the most recent increase of imports, a further oversupply of steel products on the Union market, and the resulting pressure on prices, will undoubtedly have serious consequences on the situation of the Union producers.
- (88) Therefore, the Commission considers that, on account of the real risk of trade diversion and the further restriction of imports to the U.S. of important steel producing countries, there are critical circumstances by which any delay in the adoption of provisional safeguard measures would cause damage which would be difficult to repair. The Commission therefore concludes that provisional safeguard measures should be adopted without delay.

IX. UNION INTEREST

- (89) In accordance with Article 16 of Regulation 2015/478, it has been examined whether, despite the provisional finding of threat of serious injury, compelling reasons exist for concluding that it is not in the Union interest to adopt provisional measures in this particular case. The analysis of the Union interest was based on an appraisal of all the various interests involved, including those of the Union producers, importers, and users.
- (90) The Union industry is composed of around 40 producers, located in many different Member States of the Union, and employing directly more than 180 000 people in relation to the 25 products concerned in the period 2013-2017. It has been established that the Union industry faces a threat of serious injury caused by an increase of imports. It is recalled that the Union industry has not benefited from an increase in consumption and that the economic situation of the Union industry remains fragile and vulnerable to further increase of imports. The strategic importance of the steel industry has long been recognised⁽¹⁾. It is in the Union interest to have a healthy and competitive steel industry. It is clear that if no measures are taken, both the prices and the market share of the Union producers will further decrease resulting in reduced production, increased financial losses and loss of employment, both in the steel industry and in related industries. Imposing provisional safeguard measures will temporary remedy the serious injury and facilitate the adjustment by the Union industry.
- (91) Users and importers, in general, seek the lowest possible price for steel, and it is clear that, without measures, prices would be lower. However, it is also in their interests to have a competitive and viable Union steel industry, able to meet their future needs.
- (92) In this context, several interested parties to the investigation have claimed that it would not be in the interest of the Union to impose provisional safeguard measures. They claim that measures would almost certainly result in a supply shortage and would therefore place that Union industry in a stronger negotiating position to exert pressure on prices. They further argued that the sources of supply are already limited by the imposition of anti-dumping and anti-subsidy measures and that products which are not available from Union producers or not available sufficiently or with the proper technical specifications must be excluded from safeguard measures.
- (93) In order to strike the right balance between the various legitimate interests and since the threat of serious injury is mainly linked in this case to the existence of trade diversion, the Commission considers that the form of the

⁽¹⁾ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee, the Committee of the Regions and the European Investment Bank of 16.3.2016, 'Steel: Preserving sustainable jobs and growth in Europe', COM(2016)155 final)

safeguard measures should preserve historical import levels, and that only imports in excess of this level should be subjected to them. In this respect, a system of Tariff Rate Quotas under which no obstacle is raised against traditional trade flows guarantees that the safeguard measures are in line with the Union interest. Such a form of measure would prevent the negative effects of trade diversion for the Union industry, while at the same time preserve traditional trade supply sources and effective competition in the steel market.

- (94) In these circumstances, the Commission considers that the risk that the adopted measure triggers a supply shortage or a price increase is not material. Similarly, the claim that certain specific product categories must be excluded from safeguard measures as they are not available from Union producers or not available sufficiently or with the proper technical specifications should be rejected since traditional trade flows will be guaranteed.
- (95) Therefore, on balance, the Commission provisionally concludes that the Union interest requires the adoption of provisional safeguard measures under the specific form of a tariff increase which will be applied beyond traditional trade flows on a product category basis.

X. CONCLUSIONS AND ADOPTION OF PROVISIONAL MEASURES

1. Adoption of provisional measures

- (96) It was preliminary concluded that the Union steel industry is in a situation of threat of serious injury for the 23 product categories under assessment and that this situation is likely to develop into actual serious injury in the foreseeable future. Given the critical circumstances, it is considered that provisional safeguard measures should be taken in order to prevent damage to the EU steel industry which would be difficult to repair before the conclusion of the current investigation.

2. Form and level of measures

- (97) For the selection of the appropriate form of measure, the Commission considered the three following elements. First, serious injury to the global Union steel industry is likely to materialise due to the diversion of steel exports to the US to the EU as a consequence of the Section 232 measures. Second, it is considered that the openness of the Union market should be preserved and the traditional flow of imports should be maintained. Indeed, it is basically the excess of imports above these traditional trade flows that are considered to be the main threat for the situation of the steel industry. Finally, in conformity with Article 7(2) of Regulation (EU) 2015/478 and the Union's international obligations, in particular Article 6 of the WTO Agreement on Safeguards, the provisional measures should take the form of tariff measures.
- (98) On that basis the Commission considers that, as mentioned in recital (93), the provisional safeguard measures should take the form of a system of tariff rate quotas in excess of which an additional duty will be paid. To ensure access to the Union market to all traditional suppliers, such tariff rate quotas should be based on the average of the annual level of imports in the years 2015, 2016, and 2017. As the tariff rate quotas will be in operation for 200 calendar days, the quotas should be set at a corresponding pro-rata level to the annual figure.
- (99) The additional above-quota duty rate should be fixed at a level which is consistent with the aim of preventing serious injury to the Union industry. Given the conclusions on threat of serious injury and the fact that serious injury did not occur yet in overall terms, the Commission considers that calculating an injury margin on the basis of the constructed average non-injurious price per tonne of the Union industry's products in the most recent period does not seem to be appropriate.
- (100) Under these circumstances, the Commission rather considers it more appropriate to take a forward-looking approach to assessing the level of the duty necessary to deter imports in excess of traditional trade flows from materialising and producing serious injury to the Union industry once the level of the quota has been reached.
- (101) In this respect, the Union industry has submitted two complementary methods to calculate a sufficiently deterring tariff, which the Commission finds adequate for such purpose: the first is a partial equilibrium model of the Union market for steel, whereas the second calculates contribution margins for steel products.

- (102) A partial equilibrium model is a set of demand and supply equations focusing on one part of the economy and applying the *ceteris paribus* assumption to the rest of the economy. It also assumes that the macroeconomic impacts of the scenario that is analysed are not large enough to influence macroeconomic aggregates such as the overall wage level in an economy.
- (103) The model proposed by the Union industry is based on publically available code that is programmed and solved in a spreadsheet-software. Partial equilibrium models more broadly are a standard tool for trade policy analysis by investigating authorities, including the Commission.
- (104) The model, as most others, applies the so-called Armington assumption that products from different origins are imperfect substitutes. The model looks at the Union market only using a supply function each for Union domestic supply, import supply by countries subject to safeguards and import supply by countries exempted from safeguards. Finally, it employs an Union demand function that responds to the overall price level to determine demand for steel at the aggregate level and distributes this according to relative prices to the three mentioned sources of supply. This latter process is governed by the so-called Armington Elasticities, i.e. economic parameters representing the elasticity of substitution between products from different countries of origin that differ between product types and markets.
- (105) The data for the model comes from Eurofer and Eurostat. The Armington Elasticities, as well as the supply and demand elasticities come from established sources such as the U.S. ITC and the Global Trade Analysis Project ('GTAP'). The Armington Elasticity is set at 3,75, the demand elasticity is set at - 0,5 and the three supply elasticities are set at 4 in accordance with these sources.
- (106) Being a one-country-model certain explicit and implicit assumptions need to be made, notably concerning the U.S. steel market and the impact of the measures imposed by invoking Section 232.
- (107) First, it is assumed that these measures will succeed in excluding from the U.S. market the current exports of countries subjected to Section 232 measures. In the next step, the proportion of these excluded exports that will be diverted towards the EU market for each producer country currently exporting to the U.S. is calculated according to a methodology under which four different criteria are considered and weighted: distance to the Union, availability in the relevant region of countries capable of absorbing diverted exports, existence of countries in the region with significant overcapacity, and the existence in the country of trade defence measures in place. According to this calculation, 72 % of current US imports of steel will be diverted to the EU market, which corresponds to 55 % of total Union imports of steel in 2017. It is further assumed that these additional imports will displace Union production of the same amount.
- (108) The model is specified with the above mentioned parameters and the market data corrected for the assumptions made in the two previous recitals. The model is then solved with experiments of various magnitudes of a Union out-of-quota safeguard tariff. The results of the model predict that a tariff of 25 % would allow import levels that are about 19 % higher than in the reference period of 2015-2017. A tariff of 32 % would still allow 10 % more imports than in the reference period. A tariff of 41 % would, on the other hand, suppress imports to their 2015-2017 level.
- (109) The results of the macroeconomic trade model are complemented with a series of microeconomic simulations of typical contribution margins for 12 different product categories under assessment. The assumption behind the analysis is that in case of falling prices, producers would continue to fully utilize their capacities and export to the Union as long as variable costs are covered. The margin between the sales price and variable costs is termed the contribution margin. In other words, a producer would continue producing as long as the contribution margin is non-negative. The analysis establishes for each of the twelve product categories under assessment the Union landed price at which the contribution margin for exporters to the EU would be entirely exhausted. The spread between this price and the non-injurious domestic price on the Union market should then be the out-of-quota tariff necessary to guarantee a non-injurious price level on the Union market.
- (110) The analysis uses a basket of raw material prices based on Metal Bulleting public indices, variable cost of Chinese firms from the CRU database and assumed freight costs of \$60/tonne between China and the EU, which is stated to be a conservative estimate. It concludes that contribution margins and thus the necessary deterrent out-of-quota tariffs should be in the range of 19-45 %, with a median of 34 %, which would essentially confirm the order of magnitude of the out-of-quota tariff identified by the partial equilibrium model.

- (111) On the basis of the above, the Commission has preliminarily established that a provisional 25 % out-of-quota tariff would be sufficient to prevent serious injury from occurring. This lower tariff than the 32 % resulting from the model for ensuring a traditional trade plus 10 % import flow increase represents a cautious approach, having regard to the Union interest, and pending comments from interested parties after the adoption of the provisional measures and a closer study of the evolution of imports before the imposition of definitive measures.

3. Administration of the quotas

- (112) The best way of ensuring optimal use of the tariff quotas is to allocate them in the chronological order of the dates on which declarations of release for free circulation are accepted, as provided for in Commission Implementing Regulation (EU) 2015/2447 ⁽¹⁾. Equal and continuous access to the quotas should be ensured for all Union importers. This method of administration calls for close cooperation between the Member States and the Commission.
- (113) The eligibility of imported goods from developing countries to be excluded from the tariff quotas is dependent on the origin of the goods. The criteria for determining non-preferential origin currently in force in the Union should therefore be applied.
- (114) For the purpose of the provisional measures, in order to permit traditional trade flows to continue, a specific quota will be determined for each of the product categories on which this Regulation imposes provisional measures, irrespective of their country of origin. The remainder of the investigation will determine whether an allocation of quota by exporting country is desirable in order to ensure traditional trade flows from these countries and having regard to the impact of the provisional measures. In particular, the Commission will have to consider the potential effect of the anti-dumping and anti-subsidy measures currently in force on the allocation and usage of a per-country quota.

4. Applicable anti-dumping and anti-subsidy measures

- (115) Once the determined free-of-duty quota is reached, the safeguard measures will apply.
- (116) Several interested parties claimed that the combination of the already imposed anti-dumping and countervailing measures on many product categories with the safeguard measures on those same imports would place an undesirably onerous burden on certain exporting producers seeking to export to the EU, which may have the effect of denying them access to the Union market.
- (117) Indeed, for 12 steel product categories covered by the current provisional safeguard measures, some countries of origin are currently subject to anti-dumping and countervailing duties. It is therefore necessary to consider whether the cumulation of these measures with the safeguard measures would not lead to a greater effect than desirable ⁽²⁾. In order to avoid the imposition of 'double remedies', whenever the tariff quota is exceeded, the level of the existing anti-dumping and countervailing will be suspended or reduced to ensure that the combined effect of these measures does not exceed the highest level of the safeguard or anti-dumping/countervailing duties in place.

5. Duration

- (118) The provisional measures should apply for 200 calendar days from the date on which this Regulation enters into force.

XI. EXCLUSIONS OF CERTAIN COUNTRIES FROM THE SCOPE OF THE PROVISIONAL MEASURES

- (119) In accordance with Article 18 of Regulation 2015/478 and the international obligations of the Union, the provisional measures should not apply to any product originating in a developing country as long as its share of imports of that product into the Union does not exceed 3 %, provided that developing country members of the WTO with less than a 3 % import share, collectively account for not more than 9 % of total Union imports of the product concerned.

⁽¹⁾ Commission Implementing Regulation (EU) 2015/2447 of 24 November 2015 laying down detailed rules for implementing certain provisions of Regulation (EU) No 952/2013 of the European Parliament and of the Council laying down the Union Customs Code (OJ L 343, 29.12.2015, p. 558).

⁽²⁾ Regulation (EU) 2015/477 of the European Parliament and of the Council of 11 March 2015 on measures that the Union may take in relation to the combined effect of anti-dumping or anti-subsidy measures with safeguard measures (OJ L 83, 27.3.2015, p. 11).

- (120) The preliminary determination made by the Commission shows that the product categories concerned originating in certain developing countries meet the requirements to benefit from the abovementioned derogation. Annex IV (*List of products originating in developing countries to which the provisional measures apply*) specifies the developing countries for the purposes of this Regulation. It also indicates for each of the 23 product categories the developing countries to which the provisional measures apply. The Commission considers it appropriate at this stage to calculate the volume of imports from developing countries on the basis of each product category since the tariff rate quota is also established by reference to traditional trade flows from each category individually. This is without prejudice as to future decisions regarding whether a country can be considered as a developing country.
- (121) As set out in recital (80) above, on account of the close integration of markets with EEA members, the overall figures of imports from these countries, and the low risk of trade diversion, the Commission considers that the products under assessment originating in Norway, Iceland, and Liechtenstein should be excluded from the application of this Regulation,

HAS ADOPTED THIS REGULATION:

Article 1

1. Tariff quotas are hereby opened in relation to imports into the Union of each of the 23 product categories listed in Annex I for a period of 200 days from the entry into force of this Regulation.
2. Tariff quotas are specified in Annex V (defined by reference to the CN codes specified in relation to it).
3. Where the relevant tariff quota is exhausted or where imports of the product categories do not benefit from the relevant tariff quota, an additional duty at the rate of 25 % shall be levied. That additional duty shall apply to the customs value of the product being imported.

Article 2

1. The origin of any product to which this Regulation applies shall be determined in accordance with the provisions in force in the Union relating to non-preferential origin.
2. Unless otherwise specified, the relevant provisions in force concerning customs duties shall apply.

Article 3

The tariff quotas shall be managed by the Commission and the Member States in accordance with the management system for tariff quotas provided for in Articles 49 to 54 of Commission Implementing Regulation (EU) 2015/2447.

Article 4

Imports of the product categories referred to in Article 1, which are already on their way to the Union on the date of entry into force of this Regulation, whose destination cannot be changed, shall not be attributed to the tariff quotas, or subject to the additional duty specified in Article 1, and may be put into free circulation.

Article 5

The Member States and the Commission shall cooperate closely to ensure compliance with this Regulation.

Article 6

1. Subject to paragraph 2, imports of the 23 product categories specified in Annex I originating in one of the developing countries shall, as specified in Annex IV, not be subject to the tariff quotas or subject to the additional duty referred to in Article 1.
2. For each of the 23 product categories, Annex IV specifies the originating developing countries which shall be subject to the measures set out in Article 1.

Article 7

Products originating in Norway, Iceland, and Liechtenstein shall not be subject to the measures set out in Article 1.

Article 8

This Regulation shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, 17 July 2018.

For the Commission

The President

Jean-Claude JUNCKER

ANNEX I — Products concerned

Product Number	Product category	CN Codes
1	Non Alloy and Other Alloy Hot Rolled Sheets and Strips	7208 10 00, 7208 25 00, 7208 26 00, 7208 27 00, 7208 36 00, 7208 37 00, 7208 38 00, 7208 39 00, 7208 40 00, 7208 52 10, 7208 52 99, 7208 53 10, 7208 53 90, 7208 54 00, 7211 13 00, 7211 14 00, 7211 19 00, 7212 60 00, 7225 19 10, 7225 30 10, 7225 30 30, 7225 30 90, 7225 40 15, 7225 40 90, 7226 19 10, 7226 91 20, 7226 91 91, 7226 91 99
2	Non Alloy and Other Alloy Cold Rolled Sheets	7209 15 00, 7209 16 90, 7209 17 90, 7209 18 91, 7209 25 00, 7209 26 90, 7209 27 90, 7209 28 90, 7209 90 20, 7209 90 80, 7211 23 20, 7211 23 30, 7211 23 80, 7211 29 00, 7211 90 20, 7211 90 80, 7225 50 20, 7225 50 80, 7225 99 00, 7226 20 00, 7226 92 00
3	Electrical Sheets (other than GOES)	7209 16 10, 7209 17 10, 7209 18 10, 7209 26 10, 7209 27 10, 7209 28 10, 7225 19 90, 7226 19 80
4	Metallic Coated Sheets	7210 20 00, 7210 30 00, 7210 41 00, 7210 49 00, 7210 61 00, 7210 69 00, 7210 90 80, 7212 20 00, 7212 30 00, 7212 50 20, 7212 50 30, 7212 50 40, 7212 50 61, 7212 50 69, 7212 50 90, 7225 91 00, 7225 92 00, 7226 99 10, 7226 99 30, 7226 99 70
5	Organic Coated Sheets	7210 70 80, 7212 40 80
6	Tin Mill products	7209 18 99, 7210 11 00, 7210 12 20, 7210 12 80, 7210 50 00, 7210 70 10, 7210 90 40, 7212 10 10, 7212 10 90, 7212 40 20
7	Non Alloy and Other Alloy Quarto Plates	7208 51 20, 7208 51 91, 7208 51 98, 7208 52 91, 7208 90 20, 7208 90 80, 7210 90 30, 7225 40 12, 7225 40 40, 7225 40 60
8	Stainless Hot Rolled Sheets and Strips	7219 11 00, 7219 12 10, 7219 12 90, 7219 13 10, 7219 13 90, 7219 14 10, 7219 14 90, 7219 22 10, 7219 22 90, 7219 23 00, 7219 24 00, 7220 11 00, 7220 12 00
9	Stainless Cold Rolled Sheets and Strips	7219 31 00, 7219 32 10, 7219 32 90, 7219 33 10, 7219 33 90, 7219 34 10, 7219 34 90, 7219 35 10, 7219 35 90, 7219 90 20, 7219 90 80, 7220 20 21, 7220 20 29, 7220 20 41, 7220 20 49, 7220 20 81, 7220 20 89, 7220 90 20, 7220 90 80
12	Non Alloy and Other Alloy Merchant Bars and Light Sections	7214 30 00, 7214 91 10, 7214 91 90, 7214 99 31, 7214 99 39, 7214 99 50, 7214 99 71, 7214 99 79, 7214 99 95, 7215 90 00, 7216 10 00, 7216 21 00, 7216 22 00, 7216 40 10, 7216 40 90, 7216 50 10, 7216 50 91, 7216 50 99, 7216 99 00, 7228 10 20, 7228 20 10, 7228 20 91, 7228 30 20, 7228 30 41, 7228 30 49, 7228 30 61, 7228 30 69, 7228 30 70, 7228 30 89, 7228 60 20, 7228 60 80, 7228 70 10, 7228 70 90, 7228 80 00
13	Rebars	7214 20 00, 7214 99 10
14	Stainless Bars and Light Sections	7222 11 11, 7222 11 19, 7222 11 81, 7222 11 89, 7222 19 10, 7222 19 90, 7222 20 11, 7222 20 19, 7222 20 21, 7222 20 29, 7222 20 31, 7222 20 39, 7222 20 81, 7222 20 89, 7222 30 51, 7222 30 91, 7222 30 97, 7222 40 10, 7222 40 50, 7222 40 90
15	Stainless Wire Rod	7221 00 10, 7221 00 90
16	Non Alloy and Other Alloy Wire Rod	7213 10 00, 7213 20 00, 7213 91 10, 7213 91 20, 7213 91 41, 7213 91 49, 7213 91 70, 7213 91 90, 7213 99 10, 7213 99 90, 7227 10 00, 7227 20 00, 7227 90 10, 7227 90 50, 7227 90 95

Product Number	Product category	CN Codes
17	Angles, Shapes and Sections of Iron or Non Alloy Steel	7216 31 10, 7216 31 90, 7216 32 11, 7216 32 19, 7216 32 91, 7216 32 99, 7216 33 10, 7216 33 90
18	Sheet Piling	7301 10 00
20	Gas pipes	7306 30 41, 7306 30 49, 7306 30 72, 7306 30 77
21	Hollow sections	7306 61 10, 7306 61 92, 7306 61 99
22	Seamless Stainless Tubes and Pipes	7304 11 00, 7304 22 00, 7304 24 00, 7304 41 00, 7304 49 10, 7304 49 93, 7304 49 95, 7304 49 99
23	Bearing Tubes and Pipes	7304 51 12, 7304 51 18, 7304 59 32, 7304 59 38
25	Large welded tubes	7305 11 00, 7305 12 00, 7305 19 00, 7305 20 00, 7305 31 00, 7305 39 00, 7305 90 00
26	Other Welded Pipes	7306 11 10, 7306 11 90, 7306 19 10, 7306 19 90, 7306 21 00, 7306 29 00, 7306 30 11, 7306 30 19, 7306 30 80, 7306 40 20, 7306 40 80, 7306 50 20, 7306 50 80, 7306 69 10, 7306 69 90, 7306 90 00
28	Non Alloy Wire	7217 10 10, 7217 10 31, 7217 10 39, 7217 10 50, 7217 10 90, 7217 20 10, 7217 20 30, 7217 20 50, 7217 20 90, 7217 30 41, 7217 30 49, 7217 30 50, 7217 30 90, 7217 90 20, 7217 90 50, 7217 90 90

ANNEX II

II.1 — Growth in imports for the 23 product categories (in tonnes)

Product Number	Product category	2013	2014	2015	2016	2017	growth 2017 compared to 2013
1	Non Alloy and Other Alloy Hot Rolled Sheets and Strips	4 814 207	5 212 268	7 807 441	8 574 007	6 991 376	45 %
2	Non Alloy and Other Alloy Cold Rolled Sheets	1 832 159	1 903 092	2 759 877	1 998 437	2 462 471	34 %
3	Electrical Sheets (other than GOES)	266 559	285 132	280 256	318 496	379 649	42 %
4	Metallic Coated Sheets	1 854 963	2 202 856	2 687 715	3 911 752	4 980 452	168 %
5	Organic Coated Sheets	681 698	725 296	622 553	730 625	915 248	34 %
6	Tin Mill products	552 384	662 861	638 316	756 016	617 567	12 %
7	Non Alloy and Other Alloy Quarto Plates	1 419 767	1 959 605	2 554 930	2 814 802	2 530 630	78 %
8	Stainless Hot Rolled Sheets and Strips	175 836	233 028	269 697	351 075	436 173	148 %
9	Stainless Cold Rolled Sheets and Strips	697 457	1 017 613	787 521	843 352	976 108	40 %
12	Non Alloy and Other Alloy Merchant Bars and Light Sections	911 115	1 219 800	1 200 627	1 400 824	1 385 829	52 %
13	Rebars	527 008	972 602	1 430 014	1 292 971	1 191 445	126 %
14	Stainless Bars and Light Sections	113 071	147 453	142 416	147 811	159 577	41 %
15	Stainless Wire Rod	52 082	71 229	57 627	58 670	62 978	21 %
16	Non Alloy and Other Alloy Wire Rod	1 125 730	1 289 953	1 697 912	2 000 967	2 094 274	86 %
17	Angles, Shapes and Sections of Iron or Non Alloy Steel	223 669	277 507	268 014	388 041	262 745	17 %
18	Sheet Piling	15 870	16 503	14 051	36 970	85 054	436 %
20	Gas pipes	266 467	340 051	298 103	336 050	380 257	43 %
21	Hollow sections	461 263	552 874	574 490	725 545	820 667	78 %
22	Seamless Stainless Tubes and Pipes	32 581	38 782	39 719	42 510	42 701	31 %
23	Bearing Tubes and Pipes	7 489	9 426	11 944	9 773	8 663	16 %
25	Large welded tubes	286 939	411 273	209 524	159 219	1 044 534	264 %

Product Number	Product category	2013	2014	2015	2016	2017	growth 2017 compared to 2013
26	Other Welded Pipes	474 949	491 934	510 548	540 386	571 167	20 %
28	Non Alloy Wire	573 988	722 719	692 714	736 500	722 633	26 %

II.2 — Growth in imports for the 23 product categories (in tonnes)

Product Number	Product category	Q1 2017	Q1 2018	growth Q1 2017 vs. Q1 2018
1	Non Alloy and Other Alloy Hot Rolled Sheets and Strips	1 810 764	2 079 408	15 %
2	Non Alloy and Other Alloy Cold Rolled Sheets	679 628	630 459	– 7 %
3	Electrical Sheets (other than GOES)	80 836	114 451	42 %
4	Metallic Coated Sheets	1 482 049	1 190 741	– 20 %
5	Organic Coated Sheets	212 209	201 838	– 5 %
6	Tin Mill products	146 457	168 583	15 %
7	Non Alloy and Other Alloy Quarto Plates	676 207	640 176	– 5 %
8	Stainless Hot Rolled Sheets and Strips	122 092	107 577	– 12 %
9	Stainless Cold Rolled Sheets and Strips	229 981	280 549	22 %
12	Non Alloy and Other Alloy Merchant Bars and Light Sections	319 420	466 154	46 %
13	Rebars	210 505	551 316	162 %
14	Stainless Bars and Light Sections	40 602	49 988	23 %
15	Stainless Wire Rod	14 956	19 642	31 %
16	Non Alloy and Other Alloy Wire Rod	560 863	641 668	14 %
17	Angles, Shapes and Sections of Iron or Non Alloy Steel	73 733	139 670	89 %
18	Sheet Piling	19 947	20 326	2 %
20	Gas pipes	94 430	120 512	28 %
21	Hollow sections	223 618	256 998	15 %
22	Seamless Stainless Tubes and Pipes	12 411	12 399	0 %
23	Bearing Tubes and Pipes	1 316	1 498	14 %
25	Large welded tubes	48 791	51 285	5 %
26	Other Welded Pipes	145 059	153 106	6 %
28	Non Alloy Wire	176 299	202 450	15 %

II.3 — Growth in imports for the 5 product categories (in tonnes)

Product Number	Product category	2013	2014	2015	2016	2017	growth 2017 compared to 2013
10	Stainless Hot Rolled Quarto Plate	34 319	40 218	37 542	31 407	32 917	– 4 %
11	Grain-oriented electrical sheet	147 565	160 580	150 047	156 477	121 947	– 17 %
19	Railway Material	1 376	1 096	1 240	1 521	1 342	– 2 %
24	Other Seamless tubes	456 167	528 245	475 132	464 876	402 600	– 12 %
27	Non Alloy and Other Alloy Cold Finished Bars	456 791	521 976	484 927	459 327	458 310	0 %

ANNEX III — Economic indicators for the 23 product categories

Product 1 Non Alloy and Other Alloy Hot Rolled Sheets and Strips

Data per Calendar Year	2013	2014	2015	2016	2017
Consumption (tonnes)	30 225 632	31 095 524	33 121 273	34 158 703	32 768 375
<i>Imports</i>					
Volume (tonnes)	4 814 207	5 212 268	7 807 441	8 574 007	6 991 376
Market share (%)	15,9 %	16,8 %	23,6 %	25,1 %	21,3 %
Unit prices (EUR/tonne)	463	442	396	351	492
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	75 %	75 %	76 %	75 %	76 %
Production (tonnes)	76 871 621	77 990 908	77 331 686	77 563 694	79 568 514
Sales volume in the EU (tonnes)	25 411 425	25 883 256	25 313 832	25 584 696	25 776 999
Market share (%)	84,1 %	83,2 %	76,4 %	74,9 %	78,7 %
Unit sales price (EUR/tonne)	519	493	455	422	556
Net profit/loss on EU sales (in %)	– 1,9 %	0,0 %	– 3,1 %	– 1,0 %	7,8 %
Employment (end of period)	37 467	35 573	35 038	33 557	34 815
Stock	2 572 574	2 580 258	2 585 958	2 617 556	2 749 280
Cashflow	448 135 738	1 065 492 450	763 891 666	603 485 811	1 369 472 142
ROCE (%)	– 3,8 %	1,0 %	– 6,6 %	– 1,0 %	7,7 %

Price comparison for 2017

Price undercutting

11,5 %

Product 2 Non Alloy and Other Alloy Cold Rolled Sheets

Data per Calendar Year	2013	2014	2015	2016	2017
Consumption (tonnes)	9 772 904	9 728 449	10 353 391	9 849 904	10 085 487
<i>Imports</i>					
Volume (tonnes)	1 832 159	1 903 092	2 759 877	1 998 437	2 462 471
Market share (%)	18,7 %	19,6 %	26,7 %	20,3 %	24,4 %
Unit prices (EUR/tonne)	566	546	485	474	606

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	71 %	75 %	75 %	75 %	77 %
Production (tonnes)	40 855 196	41 632 189	41 639 946	41 738 974	42 811 283
Sales volume in the EU (tonnes)	7 920 370	7 805 648	7 570 764	7 829 002	7 602 288
Market share (%)	81,0 %	80,2 %	73,1 %	79,5 %	75,4 %
Unit sales price (EUR/tonne)	588	558	522	495	633
Net profit/loss on EU sales (in %)	– 4,4 %	– 2,8 %	– 3,0 %	0,6 %	9,8 %
Employment (end of period)	12 690	11 973	11 550	11 230	11 264
Stock	1 078 838	1 052 246	1 064 061	1 054 347	1 093 798
Cashflow	200 559 843	413 849 620	324 264 435	454 766 919	375 807 983
ROCE (%)	– 8,0 %	– 2,4 %	– 12,8 %	– 3,1 %	4,0 %

Price comparison for 2017

Price undercutting

4,3 %

Product 3 Electrical Sheets (other than GOES)

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	1 267 827	1 287 448	1 223 892	1 255 417	1 350 354
<i>Imports</i>					
Volume (tonnes)	266 559	285 132	280 256	318 496	379 649
Market share (%)	21,0 %	22,1 %	22,9 %	25,4 %	28,1 %
Unit prices (EUR/tonne)	648	617	578	502	642
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	87 %	80 %	80 %	82 %	81 %
Production (tonnes)	1 080 894	1 110 013	1 052 273	1 032 560	1 114 309
Sales volume in the EU (tonnes)	1 001 268	1 002 316	943 636	936 553	969 977
Market share (%)	79,0 %	77,9 %	77,1 %	74,6 %	71,8 %
Unit sales price (EUR/tonne)	705	657	606	576	699

Data per Calendar Year	2013	2014	2015	2016	2017
Net profit/loss on EU sales (in %)	– 8,9 %	– 8,1 %	– 13,0 %	– 14,3 %	– 3,2 %
Employment (end of period)	1 522	1 707	2 087	2 069	2 065
Stock	45 680	136 605	142 998	125 466	148 259
Cashflow	110 221 498	213 556 132	127 226 053	131 151 436	– 89 295 095
ROCE (%)	– 18,3 %	– 11,7 %	– 38,3 %	– 17,9 %	– 3,4 %

Price comparison for 2017

Price undercutting 8,1 %

Product 4 Metallic Coated Sheets

Data per Calendar Year	2013	2014	2015	2016	2017
Consumption (tonnes)	23 229 673	24 289 751	25 840 225	27 439 848	28 231 862

Imports

Volume (tonnes)	1 854 963	2 202 856	2 687 715	3 911 752	4 980 452
Market share (%)	8,0 %	9,1 %	10,4 %	14,3 %	17,6 %
Unit prices (EUR/tonne)	679	657	615	530	662

Situation of EU producers

Utilisation of capacity (%)	78 %	82 %	84 %	86 %	84 %
Production (tonnes)	27 930 059	29 517 243	29 875 495	29 905 847	30 450 568
Sales volume in the EU (tonnes)	21 344 052	22 056 052	23 118 423	23 490 212	23 218 040
Market share (%)	91,9 %	90,8 %	89,5 %	85,6 %	82,2 %
Unit sales price (EUR/tonne)	682	654	614	586	711
Net profit/loss on EU sales (in %)	1,9 %	5,4 %	5,5 %	7,9 %	11,7 %
Employment (end of period)	28 915	28 243	28 749	29 863	29 648
Stock	1 970 500	2 433 422	2 498 143	2 329 341	2 597 133
Cashflow	807 884 294	1 353 026 892	1 343 062 742	1 720 354 890	2 020 588 339
ROCE (%)	– 6,8 %	– 0,9 %	– 10,4 %	– 1,7 %	6,0 %

Price comparison for 2017

Price undercutting 7,0 %

Product 5 Organic Coated Sheets

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	4 533 256	4 823 144	4 809 384	5 121 927	5 221 575
<i>Imports</i>					
Volume (tonnes)	681 698	725 296	622 553	730 625	915 248
Market share (%)	15,0 %	15,0 %	12,9 %	14,3 %	17,5 %
Unit prices (EUR/tonne)	854	813	813	709	853
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	70 %	76 %	74 %	76 %	75 %
Production (tonnes)	4 479 238	4 564 346	4 574 414	4 863 169	4 940 410
Sales volume in the EU (tonnes)	3 851 467	4 097 788	4 186 771	4 391 169	4 306 231
Market share (%)	85,0 %	85,0 %	87,1 %	85,7 %	82,5 %
Unit sales price (EUR/tonne)	898	868	829	791	934
Net profit/loss on EU sales (in %)	– 1,7 %	1,4 %	1,1 %	3,7 %	3,9 %
Employment (end of period)	6 377	6 272	6 047	6 150	6 095
Stock	239 236	182 275	197 241	214 384	258 114
Cashflow	152 893 378	351 790 418	321 603 588	361 237 401	79 886 901
ROCE (%)	– 7,6 %	– 2,1 %	– 12,9 %	– 2,7 %	3,7 %

Price comparison for 2017

Price undercutting

8,6 %

Product 6 Tin Mill Products

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	3 638 423	3 758 879	3 789 391	3 792 575	3 695 205
<i>Imports</i>					
Volume (tonnes)	552 384	662 861	638 316	756 016	617 567
Market share (%)	15,2 %	17,6 %	16,8 %	19,9 %	16,7 %
Unit prices (EUR/tonne)	822	792	781	667	753
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	82 %	84 %	84 %	82 %	84 %
Production (tonnes)	4 223 583	4 315 402	4 353 002	4 302 367	4 295 575

Data per Calendar Year	2013	2014	2015	2016	2017
Sales volume in the EU (tonnes)	3 085 602	3 095 745	3 150 741	3 036 316	3 077 185
Market share (%)	84,8 %	82,4 %	83,1 %	80,1 %	83,3 %
Unit sales price (EUR/tonne)	845	821	789	728	812
Net profit/loss on EU sales (in %)	1,7 %	4,1 %	4,8 %	4,6 %	3,1 %
Employment (end of period)	7 939	7 660	7 683	7 819	7 424
Stock	380 445	394 384	394 712	297 877	356 460
Cashflow	117 064 184	201 350 074	291 440 814	272 002 110	133 250 945
ROCE (%)	– 18,6 %	– 10,1 %	– 35,2 %	– 20,4 %	– 25,0 %

Price comparison for 2017

Price undercutting

7,3 %

Product 7 Non Alloy and Other Alloy Quarto Plates

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	10 148 839	10 375 274	10 934 966	11 058 596	11 059 068
<i>Imports</i>					
Volume (tonnes)	1 419 767	1 959 605	2 554 930	2 814 802	2 530 630
Market share (%)	14,0 %	18,9 %	23,4 %	25,5 %	22,9 %
Unit prices (EUR/tonne)	513	492	474	403	533

Situation of EU producers

Utilisation of capacity (%)	58 %	62 %	62 %	63 %	65 %
Production (tonnes)	10 749 475	11 240 103	10 608 260	10 244 950	10 581 040
Sales volume in the EU (tonnes)	8 727 826	8 414 892	8 377 455	8 242 865	8 527 686
Market share (%)	14,0 %	18,9 %	23,4 %	25,5 %	22,9 %
Unit sales price (EUR/tonne)	700	676	714	582	692
Net profit/loss on EU sales (in %)	– 9,4 %	– 8,9 %	– 4,0 %	– 7,5 %	3,2 %
Employment (end of period)	18 472	17 628	17 177	16 763	16 211
Stock	707 152	788 008	896 708	862 084	819 690
Cashflow	45 651 999	123 399 207	426 592 285	– 44 547 318	205 976 592
ROCE (%)	– 12,2 %	– 0,3 %	– 3,3 %	– 9,9 %	– 1,5 %

Price comparison for 2017

Price undercutting

23,0 %

Product 8 Stainless Hot Rolled Sheets and Strips

Data per Calendar Year	2013	2014	2015	2016	2017
Consumption (tonnes)	1 168 291	1 352 875	1 590 437	1 807 242	1 487 848
<i>Imports</i>					
Volume (tonnes)	175 836	233 028	269 697	351 075	436 173
Market share (%)	15,1 %	17,2 %	17,0 %	19,4 %	29,3 %
Unit prices (EUR/tonne)	2 011	1 926	1 877	1 518	1 822
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	61 %	65 %	69 %	73 %	73 %
Production (tonnes)	3 334 814	3 525 794	3 664 821	3 842 503	3 799 867
Sales volume in the EU (tonnes)	991 962	1 119 435	1 320 528	1 455 714	1 050 966
Market share (%)	84,9 %	82,7 %	83,0 %	80,5 %	70,6 %
Unit sales price (EUR/tonne)	2 023	2 013	2 028	1 792	2 115
Net profit/loss on EU sales (in %)	– 4,2 %	– 0,3 %	4,0 %	4,9 %	9,2 %
Employment (end of period)	5 439	4 914	4 464	4 271	4 133
Stock	103 375	131 557	123 098	106 508	93 335
Cashflow	144 497 251	182 932 062	613 851 975	116 754 324	218 815 195
ROCE (%)	– 33,7 %	– 37,1 %	– 1,5 %	– 0,4 %	13,6 %

Price comparison for 2017

Price undercutting

13,9 %

Product 9 Stainless Cold Rolled Sheets and Strips

Data per Calendar Year	2013	2014	2015	2016	2017
Consumption (tonnes)	3 362 718	3 671 898	3 587 237	3 913 974	3 816 472
<i>Imports</i>					
Volume (tonnes)	697 457	1 017 613	787 521	843 352	976 108
Market share (%)	20,7 %	27,7 %	22,0 %	21,5 %	25,6 %
Unit prices (EUR/tonne)	2 098	1 985	2 064	1 782	2 023

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	71 %	76 %	80 %	84 %	84 %
Production (tonnes)	3 076 074	3 016 723	3 139 572	3 425 201	3 114 323
Sales volume in the EU (tonnes)	2 664 602	2 653 177	2 798 719	3 070 197	2 839 979
Market share (%)	79,2 %	72,3 %	78,0 %	78,4 %	74,4 %
Unit sales price (EUR/tonne)	2 259	2 272	2 238	2 014	2 323
Net profit/loss on EU sales (in %)	– 4,2 %	– 2,7 %	2,4 %	5,5 %	9,4 %
Employment (end of period)	10 205	9 483	9 220	8 892	8 812
Stock	179 087	206 956	219 170	215 904	213 931
Cashflow	135 463 456	45 971 825	847 696 098	450 355 017	685 492 711
ROCE (%)	– 12,4 %	– 7,7 %	8,5 %	10,6 %	21,5 %

Price comparison for 2017

Price undercutting

12,9 %

Product 12 Non Alloy and Other Alloy Merchant Bars and light Sections

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	11 891 558	12 422 902	12 297 356	12 678 733	13 617 607
<i>Imports</i>					
Volume (tonnes)	911 115	1 219 800	1 200 627	1 400 824	1 385 829
Market share (%)	7,7 %	9,8 %	9,8 %	11,0 %	10,2 %
Unit prices (EUR/tonne)	699	657	640	531	641
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	79 %	82 %	80 %	80 %	74 %
Production (tonnes)	12 132 593	12 585 360	12 301 986	11 839 241	12 427 808
Sales volume in the EU (tonnes)	10 964 010	11 189 221	11 095 204	11 276 054	12 230 774
Market share (%)	92,2 %	90,1 %	90,2 %	88,9 %	89,8 %
Unit sales price (EUR/tonne)	632	613	573	520	592

Data per Calendar Year	2013	2014	2015	2016	2017
Net profit/loss on EU sales (in %)	2,2 %	3,4 %	2,4 %	0,8 %	3,6 %
Employment (end of period)	9 537	9 734	10 057	10 342	10 486
Stock	749 386	888 456	914 268	943 355	1 023 612
Cashflow	220 994 774	264 742 034	272 433 127	255 904 385	123 997 731
ROCE (%)	– 1,2 %	3,7 %	3,3 %	3,9 %	6,9 %

Price comparison for 2017

Price undercutting – 8,3 %

Product 13 Rebars

Data per Calendar Year	2013	2014	2015	2016	2017
Consumption (tonnes)	9 617 685	10 359 993	10 664 689	11 099 947	11 253 309

Imports

Volume (tonnes)	527 008	972 602	1 430 014	1 292 971	1 191 445
Market share (%)	5,5 %	9,4 %	13,4 %	11,6 %	10,6 %
Unit prices (EUR/tonne)	475	446	388	353	441

Situation of EU producers

Utilisation of capacity (%)	72 %	72 %	71 %	73 %	67 %
Production (tonnes)	13 171 558	13 019 699	12 763 140	13 191 436	12 494 712
Sales volume in the EU (tonnes)	8 906 120	9 187 941	9 019 809	9 568 119	9 848 615
Market share (%)	92,6 %	88,7 %	84,6 %	86,2 %	87,5 %
Unit sales price (EUR/tonne)	460	437	386	367	436
Net profit/loss on EU sales (in %)	– 2,0 %	– 2,5 %	– 2,6 %	3,4 %	4,8 %
Employment (end of period)	5 563	5 441	5 529	5 634	5 457
Stock	761 808	683 591	642 506	602 948	659 484
Cashflow	20 571 082	14 116 433	53 015 513	165 167 521	249 292 475
ROCE (%)	0,9 %	2,4 %	1,9 %	6,2 %	9,3 %

Price comparison for 2017

Price undercutting – 1,3 %

Product 14 Stainless Bars and light Shapes

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	526 080	593 501	593 530	630 737	632 804
<i>Imports</i>					
Volume (tonnes)	113 071	147 453	142 416	147 811	159 577
Market share (%)	21,5 %	24,8 %	24,0 %	23,4 %	25,2 %
Unit prices (EUR/tonne)	3 092	2 894	3 035	2 590	2 885
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	65 %	68 %	68 %	69 %	72 %
Production (tonnes)	527 386	597 178	599 927	637 938	641 446
Sales volume in the EU (tonnes)	411 655	444 339	450 094	482 314	472 247
Market share (%)	78,2 %	74,9 %	75,8 %	76,5 %	74,6 %
Unit sales price (EUR/tonne)	2 988	2 969	2 838	2 404	2 807
Net profit/loss on EU sales (in %)	5,2 %	5,6 %	4,1 %	2,3 %	5,8 %
Employment (end of period)	3 680	3 766	3 737	3 789	3 844
Stock	83 561	91 900	89 676	90 409	90 893
Cashflow	111 869 518	142 849 693	191 511 047	155 623 001	145 832 442
ROCE (%)	1,0 %	4,3 %	1,4 %	- 0,7 %	4,9 %

Price comparison for 2017

Price undercutting

- 2,8 %

Product 15 Stainless Wire Rod

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	318 373	323 191	304 987	335 552	347 077
<i>Imports</i>					
Volume (tonnes)	52 082	71 229	57 627	58 670	62 978
Market share (%)	16,4 %	22,0 %	18,9 %	17,5 %	18,1 %
Unit prices (EUR/tonne)	2 300	2 193	2 310	1 962	2 228
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	63 %	64 %	65 %	69 %	71 %
Production (tonnes)	373 010	383 586	388 273	412 892	449 392

Data per Calendar Year	2013	2014	2015	2016	2017
Sales volume in the EU (tonnes)	266 290	251 961	247 359	276 880	284 098
Market share (%)	83,6 %	78,0 %	81,1 %	82,5 %	81,9 %
Unit sales price (EUR/tonne)	2 480	2 516	2 382	2 022	2 417
Net profit/loss on EU sales (in %)	– 3,7 %	– 2,1 %	– 4,7 %	– 3,1 %	3,9 %
Employment (end of period)	1 677	1 671	1 731	1 761	1 852
Stock	24 810	28 696	31 083	31 584	43 800
Cashflow	13 022 575	18 221 077	106 175 940	84 328 053	44 337 763
ROCE (%)	– 0,7 %	2,9 %	– 1,5 %	– 2,8 %	5,5 %

Price comparison for 2017

Price undercutting

7,8 %

Product 16 Non Alloy and Other Alloy Wire Rod

Data per Calendar Year	2013	2014	2015	2016	2017
Consumption (tonnes)	18 033 534	18 249 258	18 949 497	19 375 225	20 026 426
<i>Imports</i>					
Volume (tonnes)	1 125 730	1 289 953	1 697 912	2 000 967	2 094 274
Market share (%)	6,2 %	7,1 %	9,0 %	10,3 %	10,5 %
Unit prices (EUR/tonne)	522	504	439	392	486

Situation of EU producers

Utilisation of capacity (%)	80 %	84 %	83 %	81 %	83 %
Production (tonnes)	19 765 154	19 775 715	20 436 595	20 037 883	20 757 864
Sales volume in the EU (tonnes)	16 782 585	16 828 358	17 108 877	17 222 468	17 795 595
Market share (%)	93,1 %	92,2 %	90,3 %	88,9 %	88,9 %
Unit sales price (EUR/tonne)	509	492	443	420	505
Net profit/loss on EU sales (in %)	1,8 %	4,8 %	3,0 %	0,6 %	3,4 %
Employment (end of period)	11 561	11 598	11 881	13 068	13 058
Stock	876 450	896 633	1 120 091	974 085	954 649
Cashflow	234 768 428	424 076 182	365 467 214	287 106 970	310 381 566
ROCE (%)	1,0 %	6,9 %	2,9 %	3,9 %	6,7 %

Price comparison for 2017

Price undercutting

3,7 %

Product 17 Angles shapes and sections of iron or non alloy steel

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	6 159 135	6 544 142	6 549 935	7 205 377	7 375 383
<i>Imports</i>					
Volume (tonnes)	223 669	277 507	268 014	388 041	262 745
Market share (%)	3,6 %	4,2 %	4,1 %	5,4 %	3,6 %
Unit prices (EUR/tonne)	539	509	463	409	473
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	64 %	69 %	71 %	72 %	72 %
Production (tonnes)	8 583 668	8 590 216	8 894 223	9 400 691	9 605 365
Sales volume in the EU (tonnes)	5 935 432	6 266 353	6 281 426	6 817 231	7 112 453
Market share (%)	96,4 %	95,8 %	95,9 %	94,6 %	96,4 %
Unit sales price (EUR/tonne)	471	471	449	417	463
Net profit/loss on EU sales (in %)	– 6,5 %	– 3,7 %	– 0,6 %	2,1 %	– 1,8 %
Employment (end of period)	6 212	5 685	6 006	6 264	6 096
Stock	510 927	464 184	466 561	559 452	569 947
Cashflow	– 48 381 794	7 224 031	161 157 041	150 487 051	– 18 595 244
ROCE (%)	– 6,0 %	6,3 %	1,4 %	3,9 %	0,6 %

Price comparison for 2017

Price undercutting

– 2,1 %

Product 18 Sheet piling

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	574 025	637 684	577 270	584 985	626 863
<i>Imports</i>					
Volume (tonnes)	15 870	16 503	14 051	36 970	85 054
Market share (%)	2,8 %	2,6 %	2,4 %	6,3 %	13,6 %
Unit prices (EUR/tonne)	787	765	1 126	651	629

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	78 %	82 %	76 %	82 %	81 %
Production (tonnes)	907 320	940 451	840 182	777 182	817 764
Sales volume in the EU (tonnes)	558 131	621 150	563 140	548 010	541 782
Market share (%)	97,2 %	97,4 %	97,6 %	93,7 %	86,4 %
Unit sales price (EUR/tonne)	711	697	652	623	640
Net profit/loss on EU sales (in %)	6,8 %	11,5 %	8,8 %	14,0 %	3,7 %
Employment (end of period)	949	971	951	981	995
Stock	49 762	47 610	58 744	68 417	75 616
Cashflow	58 272 442	68 732 139	63 936 644	86 404 634	40 555 786
ROCE (%)	– 9,3 %	6,8 %	6,7 %	10,3 %	1,5 %

Price comparison for 2017

Price undercutting

1,7 %

Product 20 Gas pipes

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	1 211 435	1 662 233	1 653 112	1 637 097	1 642 935
<i>Imports</i>					
Volume (tonnes)	266 467	340 051	298 103	336 050	380 257
Market share (%)	22,0 %	20,5 %	18,0 %	20,5 %	23,1 %
Unit prices (EUR/tonne)	688	649	646	566	676
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	37 %	38 %	38 %	40 %	37 %
Production (tonnes)	1 053 283	1 460 549	1 471 772	1 396 933	1 392 404
Sales volume in the EU (tonnes)	944 903	1 322 070	1 354 273	1 300 727	1 262 560
Market share (%)	78,0 %	79,5 %	81,9 %	79,5 %	76,8 %
Unit sales price (EUR/tonne)	717	666	619	580	693
Net profit/loss on EU sales (in %)	0,9 %	1,3 %	2,3 %	3,9 %	0,5 %

Data per Calendar Year	2013	2014	2015	2016	2017
Employment (end of period)	552	543	548	526	509
Stock	55 178	55 305	53 434	58 081	50 697
Cashflow	15 451 286	15 884 723	16 166 705	15 309 189	20 506 964
ROCE (%)	3,7 %	3,9 %	1,1 %	1,7 %	8,7 %

Price comparison for 2017

Price undercutting 2,4 %

Product 21 Hollow sections

Data per Calendar Year	2013	2014	2015	2016	2017
Consumption (tonnes)	3 347 996	3 407 926	3 511 951	3 885 748	4 028 730

Imports

Volume (tonnes)	461 263	552 874	574 490	725 545	820 667
Market share (%)	13,8 %	16,2 %	16,4 %	18,7 %	20,4 %
Unit prices (EUR/tonne)	599	571	553	497	618

Situation of EU producers

Utilisation of capacity (%)	46 %	46 %	46 %	47 %	49 %
Production (tonnes)	3 019 375	3 019 977	3 106 261	3 333 368	3 388 786
Sales volume in the EU (tonnes)	2 882 473	2 854 843	2 936 771	3 159 965	3 207 994
Market share (%)	86,1 %	83,8 %	83,6 %	81,3 %	79,6 %
Unit sales price (EUR/tonne)	606	569	541	517	625
Net profit/loss on EU sales (in %)	– 2,7 %	– 3,9 %	– 3,3 %	0,2 %	– 0,5 %
Employment (end of period)	1 073	1 124	1 200	1 209	1 181
Stock	160 442	138 981	146 353	107 826	149 537
Cashflow	– 9 630 441	13 389 861	23 807 058	13 000 201	21 372 166
ROCE (%)	– 2,4 %	– 5,3 %	– 6,2 %	– 0,6 %	7,2 %

Price comparison for 2017

Price undercutting 1,2 %

Product 22 Seamless stainless tubes and pipes

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	96 507	101 504	97 341	96 320	95 672
<i>Imports</i>					
Volume (tonnes)	32 581	38 782	39 719	42 510	42 701
Market share (%)	33,8 %	38,2 %	40,8 %	44,1 %	44,6 %
Unit prices (EUR/tonne)	6 941	6 167	6 118	5 846	6 300
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	6 %	7 %	6 %	6 %	6 %
Production (tonnes)	116 630	124 135	101 291	101 831	92 357
Sales volume in the EU (tonnes)	61 822	61 708	56 802	53 196	52 083
Market share (%)	64,1 %	60,8 %	58,4 %	55,2 %	54,4 %
Unit sales price (EUR/tonne)	7 913	7 740	8 318	7 361	7 993
Net profit/loss on EU sales (in %)	3,1 %	5,9 %	– 0,4 %	– 0,1 %	1,2 %
Employment (end of period)	11 180	11 211	10 369	9 779	9 317
Stock	7 452	9 389	10 455	8 690	11 688
Cashflow	19 858 477	10 438 041	– 48 885 671	4 038 078	– 22 872 178
ROCE (%)	22,7 %	– 4,3 %	– 58,1 %	– 33,4 %	– 50,5 %

Price comparison for 2017

Price undercutting

21,2 %

Product 23 Bearing tubes and pipes

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	68 824	72 805	67 249	59 867	65 355
<i>Imports</i>					
Volume (tonnes)	7 489	9 426	11 944	9 773	8 663
Market share (%)	10,9 %	12,9 %	17,8 %	16,3 %	13,3 %
Unit prices (EUR/tonne)	2 069	1 626	1 749	1 630	1 608
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	68 %	64 %	53 %	52 %	63 %
Production (tonnes)	64 972	65 475	58 407	52 494	57 657

Data per Calendar Year	2013	2014	2015	2016	2017
Sales volume in the EU (tonnes)	61 324	63 378	55 304	50 092	56 691
Market share (%)	89,1 %	87,1 %	82,2 %	83,7 %	86,7 %
Unit sales price (EUR/tonne)	2 023	2 003	1 925	1 804	1 837
Net profit/loss on EU sales (in %)	4,6 %	4,9 %	– 6,7 %	– 9,2 %	– 1,8 %
Employment (end of period)	332	322	306	274	280
Stock	1 285	1 433	2 591	1 452	2 429
Cashflow	3 499 664	3 928 566	5 055 796	– 791 310	– 620 461
ROCE (%)	0,9 %	– 3,3 %	– 64,7 %	– 54,5 %	– 28,1 %

Price comparison for 2017

Price undercutting

12,5 %

Product 25 Large welded tubes

Data per Calendar Year	2013	2014	2015	2016	2017
Consumption (tonnes)	669 846	1 041 055	427 457	586 746	1 804 463
<i>Imports</i>					
Volume (tonnes)	286 939	411 273	209 524	159 219	1 044 534
Market share (%)	42,8 %	39,5 %	49,0 %	27,1 %	57,9 %
Unit prices (EUR/tonne)	1 070	793	904	772	936

Situation of EU producers

Utilisation of capacity (%)	26 %	32 %	29 %	35 %	65 %
Production (tonnes)	1 333 900	1 150 000	1 034 600	1 086 300	1 500 000
Sales volume in the EU (tonnes)	382 758	624 819	216 243	426 937	759 478
Market share (%)	57,1 %	60,0 %	50,6 %	72,8 %	42,1 %
Unit sales price (EUR/tonne)	894	887	835	771	766
Net profit/loss on EU sales (in %)	3,0 %	– 6,1 %	– 2,7 %	– 0,6 %	0,0 %
Employment (end of period)	1 512	1 545	1 365	1 372	1 326
Stock	322 722	600 020	633 600	727 048	1 139 429
Cashflow	197 726 967	– 97 558 802	94 492 289	– 70 888 943	13 666 659
ROCE (%)	– 15,8 %	– 23,5 %	– 17,7 %	– 6,7 %	9,1 %

Price comparison for 2017

Price undercutting

– 22,0 %

Product 26 Other welded tubes

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	2 385 499	3 121 613	3 126 300	3 286 436	3 352 661
<i>Imports</i>					
Volume (tonnes)	474 949	491 934	510 548	540 386	571 167
Market share (%)	19,9 %	15,8 %	16,3 %	16,4 %	17,0 %
Unit prices (EUR/tonne)	1 352	1 376	1 397	1 262	1 431
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	57 %	57 %	57 %	58 %	60 %
Production (tonnes)	2 384 152	3 166 935	3 144 492	3 190 480	3 301 195
Sales volume in the EU (tonnes)	1 907 944	2 622 348	2 588 536	2 721 349	2 765 915
Market share (%)	80,0 %	84,0 %	82,8 %	82,8 %	82,5 %
Unit sales price (EUR/tonne)	1 024	1 013	984	942	1 062
Net profit/loss on EU sales (in %)	1,2 %	2,4 %	1,7 %	4,2 %	4,3 %
Employment (end of period)	3 024	3 013	3 011	3 089	3 025
Stock	125 621	84 268	100 035	120 308	120 420
Cashflow	66 281 502	68 619 951	77 514 611	87 283 492	106 630 804
ROCE (%)	9,1 %	11,5 %	8,8 %	12,8 %	19,3 %

Price comparison for 2017

Price undercutting

– 34,8 %

Product 28 Steel Wire

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Consumption (tonnes)</i>	1 318 451	1 517 192	1 480 243	1 513 248	1 505 202
<i>Imports</i>					
Volume (tonnes)	574 083	722 773	692 918	736 623	722 858
Market share (%)	43,5 %	47,6 %	46,8 %	48,7 %	48,0 %
Unit prices (EUR/tonne)	781	729	722	626	708

Data per Calendar Year	2013	2014	2015	2016	2017
<i>Situation of EU producers</i>					
Utilisation of capacity (%)	73 %	75 %	77 %	73 %	71 %
Production (tonnes)	899 763	932 496	940 169	886 666	900 054
Sales volume in the EU (tonnes)	744 368	794 419	787 325	776 626	782 344
Market share (%)	56,5 %	52,4 %	53,2 %	51,3 %	52,0 %
Unit sales price (EUR/tonne)	940	909	840	832	905
Net profit/loss on EU sales (in %)	0,5 %	0,0 %	1,1 %	2,6 %	0,8 %
Employment (end of period)	3 387	3 395	3 429	3 459	3 408
Stock					
Cashflow	66 281 502	68 619 951	77 514 611	87 283 492	106 630 804
ROCE (%)					

Price comparison for 2017

Price undercutting

21,8 %

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ANNEX IV — List of products originating in developing countries to which the provisional measures apply

[illegible]

[illegible]

[illegible]

[illegible]

ANNEX V — *Tariff quotas*

Product Number	Order Number	Product category	CN Codes	Volume of tariff quota (net tonnes)	Additional duty rate
1	09.8501	Non Alloy and Other Alloy Hot Rolled Sheets and Strips	7208 10 00, 7208 25 00, 7208 26 00, 7208 27 00, 7208 36 00, 7208 37 00, 7208 38 00, 7208 39 00, 7208 40 00, 7208 52 99, 7208 53 90, 7208 54 00, 7211 14 00, 7211 19 00, 7212 60 00, 7225 19 10, 7225 30 10, 7225 30 30, 7225 30 90, 7225 40 15, 7225 40 90, 7226 19 10, 7226 91 20, 7226 91 91, 7226 91 99	4 269 009	25 %
2	09.8502	Non Alloy and Other Alloy Cold Rolled Sheets	7209 15 00, 7209 16 90, 7209 17 90, 7209 18 91, 7209 25 00, 7209 26 90, 7209 27 90, 7209 28 90, 7209 90 20, 7209 90 80, 7211 23 20, 7211 23 30, 7211 23 80, 7211 29 00, 7211 90 20, 7211 90 80, 7225 50 20, 7225 50 80, 7226 20 00, 7226 92 00	1 318 865	25 %
3	09.8503	Electrical Sheets (other than GOES)	7209 16 10, 7209 17 10, 7209 18 10, 7209 26 10, 7209 27 10, 7209 28 10, 7225 19 90, 7226 19 80	178 704	25 %
4	09.8504	Metallic Coated Sheets	7210 20 00, 7210 30 00, 7210 41 00, 7210 49 00, 7210 61 00, 7210 69 00, 7210 90 80, 7212 20 00, 7212 30 00, 7212 50 20, 7212 50 30, 7212 50 40, 7212 50 61, 7212 50 69, 7212 50 90, 7225 91 00, 7225 92 00, 7226 99 10, 7226 99 30, 7226 99 70	2 115 054	25 %
5	09.8505	Organic Coated Sheets	7210 70 80, 7212 40 80	414 324	25 %
6	09.8506	Tin Mill products	7209 18 99, 7210 11 00, 7210 12 20, 7210 12 80, 7210 50 00, 7210 70 10, 7210 90 40, 7212 10 10, 7212 10 90, 7212 40 20	367 470	25 %
7	09.8507	Non Alloy and Other Alloy Quarto Plates	7208 51 20, 7208 51 91, 7208 51 98, 7208 52 91, 7208 90 20, 7208 90 80, 7210 90 30, 7225 40 12, 7225 40 40, 7225 40 60, 7225 99 00	1 442 988	25 %
8	09.8508	Stainless Hot Rolled Sheets and Strips	7219 11 00, 7219 12 10, 7219 12 90, 7219 13 10, 7219 13 90, 7219 14 10, 7219 14 90, 7219 22 10, 7219 22 90, 7219 23 00, 7219 24 00, 7220 11 00, 7220 12 00	193 049	25 %
9	09.8509	Stainless Cold Rolled Sheets and Strips	7219 31 00, 7219 32 10, 7219 32 90, 7219 33 10, 7219 33 90, 7219 34 10, 7219 34 90, 7219 35 10, 7219 35 90, 7219 90 20, 7219 90 80, 7220 20 21, 7220 20 29, 7220 20 41, 7220 20 49, 7220 20 81, 7220 20 89, 7220 90 20, 7220 90 80	476 161	25 %

Product Number	Order Number	Product category	CN Codes	Volume of tariff quota (net tonnes)	Additional duty rate
12	09.8512	Non Alloy and Other Alloy Merchant Bars and Light Sections	7214 30 00, 7214 91 10, 7214 91 90, 7214 99 31, 7214 99 39, 7214 99 50, 7214 99 71, 7214 99 79, 7214 99 95, 7215 90 00, 7216 10 00, 7216 21 00, 7216 22 00, 7216 40 10, 7216 40 90, 7216 50 10, 7216 50 91, 7216 50 99, 7216 99 00, 7228 10 20, 7228 20 10, 7228 20 91, 7228 30 20, 7228 30 41, 7228 30 49, 7228 30 61, 7228 30 69, 7228 30 70, 7228 30 89, 7228 60 20, 7228 60 80, 7228 70 10, 7228 70 90, 7228 80 00	728 270	25 %
13	09.8513	Rebars	7214 20 00, 7214 99 10	714 964	25 %
14	09.8514	Stainless Bars and Light Sections	7222 11 11, 7222 11 19, 7222 11 81, 7222 11 89, 7222 19 10, 7222 19 90, 7222 20 11, 7222 20 19, 7222 20 21, 7222 20 29, 7222 20 31, 7222 20 39, 7222 20 81, 7222 20 89, 7222 30 51, 7222 30 91, 7222 30 97, 7222 40 10, 7222 40 50, 7222 40 90	82 156	25 %
15	09.8515	Stainless Wire Rod	7221 00 10, 7221 00 90	32 744	25 %
16	09.8516	Non Alloy and Other Alloy Wire Rod	7213 10 00, 7213 20 00, 7213 91 10, 7213 91 20, 7213 91 41, 7213 91 49, 7213 91 70, 7213 91 90, 7213 99 10, 7213 99 90, 7227 10 00, 7227 20 00, 7227 90 10, 7227 90 50, 7227 90 95	1 058 110	25 %
17	09.8517	Angles, Shapes and Sections of Iron or Non Alloy Steel	7216 31 10, 7216 31 90, 7216 32 11, 7216 32 19, 7216 32 91, 7216 32 99, 7216 33 10, 7216 33 90	167 817	25 %
18	09.8518	Sheet Piling	7301 10 00	24 854	25 %
20	09.8520	Gas pipes	7306 30 41, 7306 30 49, 7306 30 72, 7306 30 77	185 280	25 %
21	09.8521	Hollow sections	7306 61 10, 7306 61 92, 7306 61 99	387 343	25 %
22	09.8522	Seamless Stainless Tubes and Pipes	7304 11 00, 7304 22 00, 7304 24 00, 7304 41 00, 7304 49 10, 7304 49 93, 7304 49 95, 7304 49 99	22 818	25 %
23	09.8523	Bearing Tubes and Pipes	7304 51 12, 7304 51 18, 7304 59 32, 7304 59 38	5 549	25 %
25	09.8525	Large welded tubes	7305 11 00, 7305 12 00, 7305 19 00, 7305 20 00, 7305 31 00, 7305 39 00, 7305 90 00	258 133	25 %
26	09.8526	Other Welded Pipes	7306 11 10, 7306 11 90, 7306 19 10, 7306 19 90, 7306 21 00, 7306 29 00, 7306 30 11, 7306 30 19, 7306 30 80, 7306 40 20, 7306 40 80, 7306 50 20, 7306 50 80, 7306 69 10, 7306 69 90, 7306 90 00	296 274	25 %

Product Number	Order Number	Product category	CN Codes	Volume of tariff quota (net tonnes)	Additional duty rate
28	09.8528	Non Alloy Wire	7217 10 10, 7217 10 31, 7217 10 39, 7217 10 50, 7217 10 90, 7217 20 10, 7217 20 30, 7217 20 50, 7217 20 90, 7217 30 41, 7217 30 49, 7217 30 50, 7217 30 90, 7217 90 20, 7217 90 50, 7217 90 90	393 031	25 %