



EUROPEAN COMMISSION

Directorate General for Trade

Directorate General for Trade

LIMITED VERSION

VERSION OPEN FOR CONSULTATION

(tick box as appropriate)

## SAFEGUARD QUESTIONNAIRE

<b>Company name:</b>	
<b>Contact person at the company:</b>	

<b>Intended for:</b>	Importers of certain steel products into the Union
<b>Product concerned:</b>	Certain steel products, please refer to section B of the questionnaire
<b>Statutory reference:</b>	Regulation (EU) No 2015/478 of the European Parliament and of the Council of 27 March 2015 and Regulation (EU) No 2015/755 of the European Parliament and of the Council of 19 May 2015
<b>Regulatory reference:</b>	Notice of Initiation, OJ C 111, 26.03.2018, p. 29
<b>Internal registration number:</b>	<b>SFG009</b>
<b>Deadline for response to the questionnaire:</b>	<b>24 April 2018</b>

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**PLEASE NOTE THAT THIS QUESTIONNAIRE HAS TO BE COMPLETED TWICE, ONCE AS CONFIDENTIAL VERSION AND ONCE AS NON-CONFIDENTIAL VERSION.**

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## SECTION A – GENERAL INSTRUCTIONS FOR COMPLETING THE QUESTIONNAIRE

### **Before completing the questionnaire you should read the following notes:**

- (1) This questionnaire is intended for importers in the European Union of the 26 products subject to the current safeguard investigation. A list of the products in question with their corresponding CN codes is at section B.
- (2) This questionnaire is composed of a general section which requests information on the whole activity of the company. It also includes specific questions relating to each of the products subject to the investigation.
- (3) **When importers import more than one of the products concerned**, they are requested to complete:
  - section C, D and H once and,
  - section E, F and G separately for each of the products they import.
- (4) If you have any difficulties in completing all or part of the questionnaire, or require clarification on any questions asked, contact should be made with the officials in charge of the case (see front page).
- (5) Where the Commission finds that any interested party has supplied false or misleading information, it may disregard any such information and make use of the facts available.
- (6) Do not leave any question or section blank. It is in your own interest to reply as accurately and completely as possible and to attach all the supporting documents as requested. Always identify all units of measurement and currencies used in tables, lists and calculations.
- (7) Some questions require narrative or explanatory answers. If you need to use extra sheets in your questionnaire response, clearly refer to the specific question you are answering. Answer questions in the order presented in the questionnaire. Listed information should conform as closely as possible to the recommended formats and should be labelled clearly. If there is insufficient space in any section of the questionnaire, you should attach annexes indicating clearly to which sections they relate.
- (8) Member States of the European Union are Austria, Belgium, Bulgaria, Croatia, Czech Republic, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the United Kingdom. Answers to questions referring to the “Total Union” or “European Union” should include **all** these countries.
- (9) Although the questionnaire is addressed to your company, it is understood that **all subsidiaries or other related companies involved in the import of the product concerned in the European Union are also part in the proceeding and their information should be incorporated in the response.** Therefore, you should

endeavour to complete the questionnaire on a group level. However, if for practical reasons it is easier for you to reply per entity then do so. Please indicate clearly which companies have contributed to the information in the questionnaire. If you have any problems or questions in that respect please contact the case handlers in charge.

- (10) Information and supporting evidence may be given on a confidential basis where appropriate. This information, i.e. business secrets, etc., will not be available to any other interested party. In order to ensure the confidentiality of your information, according to Article 9 in the Safeguard Regulation, **a non-confidential summary of your reply must also be provided within the same time limit**. Where a meaningful, non-confidential summary is not provided, and where the information is susceptible of such summary, the information submitted may be disregarded. The non-confidential version of all responses submitted to the Commission services are at the disposal of all interested parties for inspection. For guidelines, please refer to annex I.
- (11) **As mentioned in the cover letter, the Commission services may carry out on-the-spot visits to examine the records of your company in order to verify the information provided in response to this questionnaire. All worksheets and documents used in answering this questionnaire, in particular those linking the information supplied with accounting and management records, should, therefore, be retained for verification purposes.**
- (12) If you intend to have another party acting on your behalf, please ensure that the Commission receives an original of the appropriate power of attorney.
- (13) Information submitted to the Commission for the purpose of trade defence investigations **shall be free from copyrights**. Interested parties, before submitting to the Commission information and/or data which is subject to third party copyrights, **must request specific permission to the copyright holder explicitly allowing a) the Commission to use the information and data for the purpose of this trade defence proceeding and b) to provide the information and/or data to interested parties to this investigation in a form that allows them to exercise their right of defence**. Interested parties are invited to fill in the annexed form (Annex II) attesting that the information submitted is free from copyrights or that they have obtained the above mentioned permission before submitting it. Interested parties shall contact the Commission for any doubts about the handling of copyrighted information.

**SECTION B - PRODUCT CONCERNED**

The products concerned by the investigation are as follows:

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

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

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

**C.1 Corporate information**

*Table 1 – Corporate information*

<b>Full name of the company:</b>	
<b>Legal form:</b>	
<b>Address:</b>	
<b>Telephone:</b>	
<b>Fax:</b>	
<b>E-mail:</b>	
<b>Contact persons (names and functions within the company):</b>	

**C.2 Company organisation**

Please supply a diagram outlining the corporate and organisational structure of your group/company and its related<sup>1</sup> entities.

**Please also indicate clearly all the companies which are included in this response (as already pointed out in (5) section A).**

**C.3 Financial statements**

Please attach the annual report for the last three completed financial years accompanied by a set of audited accounts for each year. If your company is part of a group, please provide the same consolidated financial statements for the group.

**C.4 Location of documents**

Indicate the location (full address) where the accounting records of your company (including records of the product concerned) are kept.

**C.5 Range of products**

List all main categories of products imported/sold by your company.

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<sup>1</sup> For the purpose of completing this questionnaire, persons are deemed to be related only if: they are officers or directors of one another's businesses, they are legally recognised partners in business, they are employer and employee, they are members of the same family, one of them directly or indirectly controls the other, they are both directly or indirectly controlled by a third person or such a third person controls or holds 5% or more of the outstanding voting stock or shares of both of them.

**SECTION D – INFORMATION CONCERNING THE TOTAL COMPANY.  
THIS SECTION SHOULD ONLY BE COMPLETED ONCE**

**D.1 Total sales turnover (net free of taxes after all discounts)**

Please complete the following table:

*Table 2 – Total sales value (please indicate currency)*

<b>In currency</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Total Sales Value of the Company</b>					
<b>Sales Value of All the Products Concerned</b>					
Sales value in the European Union					
Sales value to the US market					
Sales value to other markets outside the Union					

Please comment on your forecasts concerning the turnover of your company in the light of the US Safeguard Measures in the event that:

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

**D.2 Profitability for the total company**

Please report overall profit/loss before taxes in percentage of total turnover.

*Table 3 – Profit/loss in percentage of turnover*

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Total Company</b>					
<b>All the Products Concerned</b>					

Please comment on your forecasts concerning the profitability of your company in the light of the US Safeguard Measures in the event that:

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



### D.3 Total employment

Please provide the number of employees at the end of each of the following periods.

*Table 4 Employment (end of the period)*

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Total Company					
All the products concerned					

Please comment on your forecasts concerning the employment of your company in the light of the US Safeguard Measures in the event that:

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

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

**E.1 Introductory note**

This section should be completed separately for each of the products concerned imported by your company. Please indicate clearly which product group each version of section E relates to.

**E.2 Comparison**

Please comment on the comparability of the product concerned imported into the Union by your company with that produced and sold by the Union producers. Identify any differences in the technical and physical characteristic and/ or end uses of the product imported by your company and that produced and sold by the Union producers. Please also indicate if differences in production process cause any difference in quality, end use or application.

**E.3 Development of stocks of the product concerned**

*Table 5 – Annual volume of stock in tonnes*

In tonnes	2013	2014	2015	2016	2017
Opening stock					
+ Purchases of Union products					
+ Purchases from outside the Union					
- Product consumed					
- Resales					
= Closing stock in volume					

Please comment on your forecasts concerning the stocks of your company in the light of the US Safeguard Measures in the event that:

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

**E.4 Value of imports/purchases net of all discounts and rebates. For the imports please provide the purchase value at CIF-level. Please indicate clearly the delivery terms of the purchases from the Union producers. (indicate currency)**

*Table 7 – Purchase value of imports/purchases of the product concerned (please indicate currency)*

	2013	2014	2015	2016	2017
Purchases of EU products					
Total Purchases from third countries					
Of which purchases from third country A*					
Of which purchases from third country B*					

<b>Total Purchases</b>					
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\*Please specify each individual country of imports and add rows as necessary.

**E.5 Purchased/imported volume of the product concerned**

*Table 8 – Purchase volume in tonnes of the product concerned*

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Purchases of EU products</b>					
<b>Total Purchases from third countries</b>					
<b>Of which purchases from third country A*</b>					
<b>Of which purchases from third country B*</b>					
<b>Total Purchases</b>					

\*Please specify each individual country of imports and add rows as necessary.

**E.6 Unit purchase price of imports/purchases net of all discounts and rebates. For the imports please provide the price at CIF-level. Please indicate clearly the delivery terms of the purchases from the Union producers. (indicate currency)**

*Table 9 – Unit purchase price of imports/purchases of the product concerned (please indicate currency)*

<b>Unit price</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>For purchases of EU products</b>					
<b>For total Purchases from third countries</b>					
<b>Total Purchases</b>					

Please comment on how the origin, volume and prices of your purchases/imports of the product concerned (including conditions of purchases and their channels) are likely to change in the light of the US Safeguard Measures in the event that:

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

**E.7 ReSales and Profitability of the product concerned**

*Table 11 – Resales Value of the product concerned*

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Products originating in the EU</b>					
<b>Products originating outside the EU</b>					

*Table 12 – Profitability (return on turnover (%)) of the product concerned*

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Products originating in the EU</b>					
<b>Sales value of products originating outside the EU</b>					

Please comment on your forecasts concerning the profitability and sales value of your company in the light of the US Safeguard Measures in the event that:

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

## SECTION F– OTHER FACTORS

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

Please comment on these potential factors, if any, and explain on how they may have affected the situation of your company and industry.

This analysis may include your views on:

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

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

## SECTION G - UNION INTEREST

The Commission services would welcome any information or comments on whether the adoption of the safeguard measures, are/would be in the interest of the Union and how any measure adopted would affect interested parties.

The interested parties concerned by this investigation would include the following:

Upstream industry (suppliers of raw materials)  
Union producers  
Importers, traders and any intermediary parties  
Users of the product concerned.

Special consideration should be given to the following factors:

Turnover (value and volume)  
Production, capacity and capacity utilisation  
Market share  
Sales prices  
Costs  
Profits  
Return on investments  
Cash flow  
Employment  
Other

Please comment on the future developments foreseen for your company and other interested parties should definitive Safeguard Measures be imposed.

Please comment on the future developments foreseen for your company and other interested parties should definitive Safeguard Measures not be imposed.

It should be noted that any information submitted under this section would only be taken into account if supported by factual evidence.

If you import a wide range of the products listed in section B, you may want to comment of the Union interest per product.

## H. - CERTIFICATION

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

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

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Date

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Signature of authorised person

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Name and title of authorised person

<b>GUIDELINES FOR COMPLETING THE NON-CONFIDENTIAL QUESTIONNAIRE</b>
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When completing the non-confidential questionnaire you should bear in mind that all exporters, importers and other Union producers will have access to it. The non-confidential reply should be sufficiently detailed to permit a reasonable understanding of the substance of the information submitted in confidence.

In order to assist you in completing the non-confidential questionnaire we advise you to act as follows:

1. Use the completed confidential questionnaire response as a basis. Identify all information in the confidential response, which you consider is not confidential, and **copy** it to the non-confidential file.
2. After this, check once more whether the information you did not copy to the non-confidential response is really confidential. If you still consider it to be confidential, you must give the reasons why, item by item and summarise the confidential information in non-confidential form. If, in exceptional circumstances, it is not possible to even summarise the confidential information, give reasons why summarisation is not possible.

**Examples on how to summarise confidential information.**

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

Example of confidential information:

2014	2015	2016
€ 20.000	€ 30.000	€ 40.000

The non-confidential summary could be as follows:

2014	2015	2016
=100	150	200

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

Example of confidential figure:

"My cost of production is £ 300 per tonne."

The non-confidential summary could be as follows:

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

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

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

Non-confidential summary: **[one of my customers]** told me that the prices of imports were 20% lower.



<b>DECLARATION ON COPYRIGHT</b>
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Please choose one of the options specified below and fill in the respective form as instructed in point 13 in Section A of this Questionnaire.

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

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

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

**a) Permission obtained:**

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

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

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

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

**b) Permission not obtained:**

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

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