

Trade Remedies AuthorityBusiness Plan

June 2021 - March 2023

April 2022

Chief Executive's introduction

It is a pleasure to introduce the Trade Remedies Authority's Business Plan. The Trade Remedies Authority was launched on 1 June 2021 and under the terms of our enabling legislation, the Trade Act 2021, our first financial year runs to 31 March 2023. This Business Plan therefore covers the period from June 2021 to March 2023 and it is designed to be read alongside our Corporate Plan for 2021-25, which sets out the overarching strategic goals for the Trade Remedies Authority.

Our mission is to defend UK economic interests against unfair international trade practices. At the heart of our operations is carrying out high quality investigations, supported by excellent corporate services and governance functions. Over the course of this Business Plan the majority of our investigations will involve reviewing trade remedy measures that the UK brought over from the time of its membership of the European Union. But we anticipate that an increasing share of our work programme will be carrying out new investigations and other forms of review. Throughout we will learn as we go, drawing on international best practice, and adapt to any changes in the UK trade remedies regime.

Central to delivery of this work programme is investing in our people and collectively creating an organisation that embodies our values of expertise, integrity, inclusion and transparency. We are developing a People Strategy designed to ensure that we can attract, develop and retain a diverse range of expert, highpotential individuals who are motivated by our role at the core of UK trade policy. And to help to achieve our vision to become a globally respected trade remedies body, we will also step up our engagement with our audiences across the whole UK and internationally, to build understanding about the part that trade remedies can play in our economic prosperity and in supporting open trade.

We strive to be a digital-by-default organisation and over the period of the Plan we will be investing in our Trade Remedy Service (TRS) to improve the user experience. The updated TRS will be a key part of a new digital vision designed to steer us, as a young body, in ways that optimise the opportunities that digital technologies offer. That said, some things will always be best done in person and we anticipate carrying out an increasing number of physical verification visits over the course of the

Plan, initially within the UK and, over time, overseas as the global economy opens up for international travel. Finally, like many other organisations we will be experimenting to find how best to blend remote and physical working to maximise both business delivery and the engagement and wellbeing of our staff.

We anticipate publishing our first full performance report, including a statement of accounts, in summer 2023.

Oliver Griffiths Chief Executive Officer



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Our business and strategy

We have been established as a Non-Departmental Public Body to undertake investigations into unfair trade practices and to make recommendations on appropriate measures to the Secretary of State for International Trade. Our overall mission is to defend UK economic interests against unfair international trade practices.

As part of the work needed to create a UK-specific trade remedies system outside the European Union (EU), we are also carrying out transition reviews into existing EU trade remedy measures which were carried across into our domestic law when the UK left the EU. Our reviews will test if the measures are right for the UK economy or if changes might be needed.

As described in our Corporate Plan, we will focus on achieving four strategic goals over the next three years.

Cases

Undertake fair, impartial, rigorous and efficient investigations.

People

Develop an expert and innovative organisation where people enjoy working.

Digital

Provide a high-quality experience for end-users, through digitally enabled delivery.

Reputation

Be well-understood, known and respected by our domestic and international stakeholders.





Our priorities for June 2021 March 2023

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We will target our activity across the four priority pillars - People, Cases, Digital and Reputation.

Cases

- Complete first set of Transition Reviews
- Initiate and complete new cases, reviews and reconsiderations (process new applications and progress cases)
- Discharge obligations following any use of Secretary of State's 'call-in' powers
- Advise the Secretary of State

People

- People and workforce planning
- Culture, pay and retention
- Leadership and management
- Recruitment and attraction

Digital

- Digital vision and capabilities
- Trade Remedies Service enhancement
- Transition of desktop services
- Creating a cyber and data security strategy

Reputation

- Improve engagement with businesses and stakeholders
- Grow our profile and 'thought leadership'
- Implementation of UK Government's Trade Remedies reform
- Governance, finance and resources

Our business priorities

Establish

June 2021 - March 2023

- Deliver reviews of 16 transitioned measures
- Assess new applications in accordance with our published guidance and initiate new cases
- Develop a People Strategy that builds employee engagement, attraction and retention and competitive pay arrangements
- Create Digital Vision and roadmap for success and improve TRS user experience
- Transition to an arm's length body, establish a Quality Assurance framework and set performance measures
- Create and implement a stakeholder engagement strategy
- Begin implementation of the trade remedies reform
- Decide on future office needs in time for 2024 lease end

Our Key Performance Indicators

Our Key Performance Indicators, set out below, will enable us to track our performance against each of these priority areas.

Cases

Initiate 12 Transition Reviews between June 2021 and March 2023 and assess new dumping and subsidisation cases within 40 days of receipt of application and safeguarding within 30 days of receipt.

Complete all Transition Reviews within 72 weeks of initiation and new cases within 50 weeks.

People

Increase employee engagement rating from our internal people survey, from 61% to 66% (Civil Service benchmark)

At least 90% of staff posts will be filled at all times.

Digital

Establish TRS user experience and satisfaction baseline and then achieve an increase.

Implementation of digital roadmap to achieve digital vision to timescales and within budget.

Reputation

Trade Remedies Authority mission is understood, recognised and being discussed by at least 50% of our stakeholders targeted.

TRA's governance including financial management and the government functional standards are sufficiently robust for audit assurances and the first annual report and accounts.

Business delivery



Our core business

Our core business is conducting trade remedies investigations.

A trade remedies investigation is a substantial and multifaceted exercise that involves first gathering a variety of evidence from interested parties and other sources.

We then verify that evidence, analyse data and reach judgements about whether tariff measures to protect UK industries from injury caused by unfairly traded imports would be in the interest of the UK economy.

Overall, an investigation can last 12-18 months. Our staff work with the businesses who make the products, but also their suppliers and customers to understand how those markets work. As well as industry engagement, we also listen to the views of wider groups and stakeholders, including trade associations, parliamentarians and unions, who all bring valuable perspectives into how we deliver our work.

What we analyse

We bring specialist economic, legal and financial analysis to bear on the key questions we have to answer:

- have there been dumped or subsidised imports?
- has UK industry been harmed by them?
- would imposing tariff measures do more good than harm?

Keeping to our principle of transparency, we publish our evidence, analysis and provisional conclusions for public comment on our online Trade Remedies Service.



Over this period, we aim to deliver reviews of 16 measures transitioned into UK law when we left the EU. This represents about a third of the total cases carried over from the EU. Most of these measures relate to steel products, both specific measures aimed at countering dumped or subsided imports from countries including China and Russia and the more general safeguards imposed to address unexpected surges of imports. The war in Ukraine has brought into sharp focus how the TRA has been able to use its independent powers to act swiftly to consider how Russia and Belarus' quotas for steel that can be imported without safeguard tariffs can be reallocated to other countries. Our aim is to ensure UK manufacturing and construction industries can still source competitively priced steel without compromising the protection afforded by the safeguard for UK steel industry. Measures we are reviewing also bear on products as diverse as glass fibre and rainbow trout.

In addition, we will assess applications for new investigations and conduct those investigations rigorously, fairly and consistently with statutory guidance and timescales. The first new case we started in June 2021 relates to aluminium extrusions. In April we opened our second case into the export of ironing boards from Turkey, which may be causing harm to UK manufacturers of ironing boards. Our investigation will look to establish whether imports of ironing boards from Turkish Free Zones are benefiting from subsidies, and whether it would be in the UK's interests for countervailing measures to be put in place to mitigate any injury.

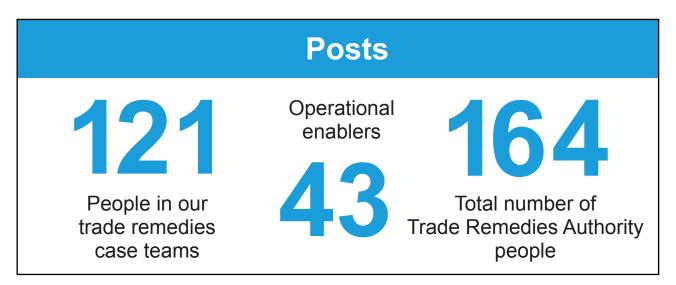
We may also undertake other reviews of existing trade remedies measures. Assessing trade remedy measures is investigatory work the UK state has not done since the early 1970s. We are working with businesses and stakeholders who have often never engaged with a trade remedies investigation before. So, we ensure our Pre-Application Office supports enquiries from all parties looking for information on submitting an application to us. Some aspects of the UK's approach to trade remedies analysis, in particular the Economic Interest Test, are unique. The Economic Interest Test ensures the interests of all affected sectors of the UK economy are taken into account, such as regional impacts. No other comparable trade remedies body in the world does quite the same analysis. We are breaking new ground. We expect to improve the speed, quality and timeliness of our investigations and recommendations to the Secretary of State, as we gain experience through our first cases.

Our resources



People

Our target headcount for 2022-23 is 164 people.



Our People Strategy will bring to life how we will develop an expert and innovative organisation where our people enjoy working. We will use our Staff Voice Forum, regular staff engagement mechanisms and an annual People Survey to keep informed of the issues and priorities for our people and to work collectively in addressing them. We are building our employee value proposition to ensure that we can attract, retain and develop the skills, capabilities, and diverse workforce and experiences that we need to achieve our goals.

Budget

The indicative budget allocation for pay and non-pay costs are shown below, representing the equivalent figures for the period 1st June 2021 to 31st March 2023. TRA's precise grant-inaid during this period will be set through discussions with Department for International Trade.

| Trade Remedies Authority Budget (£) | June 2021 - March 2023 | |
|--|------------------------|--|
| Pay | 16,911,613 | |
| Digital & ICT | 4,174,463 | |
| VAT | 1,976,398 | |
| Outsourced contracts | 1,130,533 | |
| Estates | 1,407,704 | |
| Learning and development | 733,748 | |
| Travel and subsistence | 563,138 | |
| Other costs | 2,665,143 | |
| Total Budget | 29,562,739 | |

Outsourcing – including audit fees, commercial support and other supplier contracts.

Other costs – including depreciation/amortisation of assets and a data sharing project with HMRC.

Risks to achieving this plan



There are risks which may prevent us from delivering what we set out in this Business Plan. Our Executive Committee will review risks monthly and agree mitigating actions to ensure we can achieve our Business Plan priorities and remain on track in the delivery of our Corporate Plan. The Board and our Audit and Risk Assurance Committee will provide objective oversight and assurance of our risk management framework and our strategic risks.

Failing to undertake investigations in an impartial and rigorous manner or in line with legal requirements.

Delays in delivering reviews and/or cases and governance workstreams to statutory deadlines.

Lack of engagement with case parties means our cases are weakened by delay and/ or an inability to gather or process all relevant information.

The TRA's Accounting Officer is unable to fulfil their personal responsibilities.

5.

We are subjected to a cyber-attack and/ or information security failings.

We do not attract and develop the skilled and engaged workforce needed to achieve our mission and vision.

This Business Plan is designed to take the UK's Trade Remedies Authority from its inception as a brand new independent body to an established authority delivering on its mission to defend UK economic interests against unfair international trade practices. If you have any questions about this plan or about our work in general, please visit our www.gov.uk website or email us at contact@traderemedies.gov.uk.





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