



House of Commons  
International Trade Committee

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**UK trade remedies  
policy: Trade Remedies  
Authority's Response to  
the Committee's Third  
Report of Session 2019–  
21**

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**Third Special Report of Session  
2021–22**

*Ordered by the House of Commons  
to be printed 15 September 2021*

## The International Trade Committee

The International Trade Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Department for International Trade and its associated public bodies.

### Current membership

[Angus Brendan MacNeil MP](#) (*Scottish National Party, Na h-Eileanan an Iar*) (Chair)

[Mark Garnier MP](#) (*Conservative, Wyre Forest*)

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### Powers

The Committee is one of the departmental select committees, the powers of which are set out in House of Commons Standing Orders, principally in SO No 152. These are available on the internet via [www.parliament.uk](http://www.parliament.uk).

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Evidence relating to this report is published on the [inquiry publications page](#) of the Committee's website.

### Committee staff

The current staff of the Committee are Eligio Cerval-Peña (Clerk), Matthew Chappell (Committee Operations Manager), Professor Tony Heron (POST Parliamentary Academic Fellow), James Hockaday (Committee Specialist), Adam McGee (Media Officer), Saminah Turk (Committee Operations Officer), David Turner (Committee Specialist), Emily Unell (Second Clerk).

### Contacts

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You can follow the Committee on Twitter using [@CommonsIntTrade](#)

## Third Special Report

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The Committee published its Third Report of Session 2019–21, UK trade remedies policy (HC 701), on 22 March 2021. The Department for International Trade's response—the First Report of Session 2020–21, [UK trade remedies policy: Government Response to the Committee's Third Report of Session 2019–21 \(HC 269\)](#)—was published on 28 May 2021. The Trade Remedies Authority's response was received on 15 July 2021 and is appended to this report.

## Appendix: Trade Remedies Authority's response to the ITC Report

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### Recommendations 4, 5 and 6

*We note that there has already been a very high staff turnover within Trade Remedies Investigations Directorate (TRID). We acknowledge that there have been difficult circumstances, but it is disappointing there are still far fewer staff in post than projected. The Minister told us in January that TRID had 107 staff in post against a projected total of 143 which means that TRID's current staffing level is around 25% lower than that required. (Paragraph 34)*

*We also note concerns expressed by witnesses that the lack of experience of TRA staff will place them at a disadvantage when dealing with other more experienced stakeholders. There was a very significant initial spend on staff training, and we are concerned that some of the benefits of this training may have been lost because of the high initial staff turnover rate. We welcome the recent appointment of a new Chief Executive with trade policy experience. (Paragraph 35)*

*The evidence we have received in this inquiry indicates that the recruitment, retention and training of TRA staff remains a critical factor in establishing the UK's new trade defence regime and presents one of the most significant areas of risk for the future success and credibility of the regime. We are not convinced that TRID has taken sufficient action to deal with its high staff turnover rate and it still does not have in place the number of staff that it needs. These issues must be resolved quickly to ensure the effective and successful operation of the UK trade remedies system. We ask that the TRA write to us within three months of its establishment setting out initial steps it has taken to address these issues. (Paragraph 36)*

### Trade Remedies Authority's response:

As of the end of June 2021, the Trade Remedies Authority (TRA) had 121 people in post against a profile of 143 for this year, and attrition over the previous 12 months was 24.1%. Reducing turnover and recruiting to our full headcount are high priorities of the TRA Board and Executive Committee (ExCo) this year.

To help us understand why people leave, we collect feedback from leavers in exit interviews. Whilst we were operating as the Trade Remedies Investigations Directorate (TRID), leaving factors had been reported as: the uncertainty with the EU Exit and the delayed

establishment of the TRA; delays in going live with casework; and, staff not finding a sense of personal fit to a new, developing area of work. Recently we have seen a considerable 'cohort effect' where staff who joined in 2018 have chosen to move on after more than two years in the role, which is a known trend within the civil service. The inability of TRA to offer pay progression within a grade incentivises staff looking for a salary increase to seek rapid promotion or look for better paid roles in another organisation. The majority of leavers have left to take up jobs in the civil service.

In early 2021, ExCo approved an Action Plan responding to the results of the People Survey published in December 2020. Our collective aim is to make the Trade Remedies Authority a place where all our people enjoy coming to work and feel proud of the work they do. Our Action Plan includes a series of measures designed to improve staff engagement and reduce attrition including: developing our collective leadership; developing a Pay and Reward framework; refreshing the health and wellbeing offer; investing in the learning and development of our workforce, considering our post-COVID ways of working and ensuring a zero-tolerance approach to bullying, harassment and discrimination. ExCo track progress on delivery of the Action Plan on a monthly basis and are currently running a Pulse Survey to gauge progress.

The launch of the TRA as a Non-Departmental Public Body on 1 June allows us to develop a clearly defined TRA brand and a differentiated employee value proposition, as well as reviewing our recruitment processes including diversity and inclusion outcomes. We are funded to invest in the learning and development of our people and are reflecting on how to deliver career development and opportunities for progression within a relatively small organisation.

The TRA is committed to a zero-tolerance approach to bullying or harassment and we will develop a Pay and Reward Strategy that considers our overall benefits package, drawing on a benchmarking exercise and our experience in the recruitment market, where we have failed to attract full fields for some posts such as verification experts. We will consider the evidence to develop a Business Case to Cabinet Office and HM Treasury that modernises TRA pay architecture to enable career pathways, increase productivity and be competitive with other economic regulators by introducing capability based progression and allowances.

## Recommendation 7

*We note that the initial recruitment for members of the TRA Board is now complete. We recommend that an initial priority of the Board is to prepare and publish a clear statement of detailed governance arrangements to provide clarity on the TRA's decision-making processes and its arrangements for interfacing with stakeholder groups. (Paragraph 45)*

### Trade Remedies Authority's response

We agree with the Committee's recommendation. The Trade Remedies Authority was formally established on 1 June 2021 and our Board members were formally appointed on the same day. The Trade Act 2021 contains provisions related to the TRA's governance arrangements that follow Cabinet Office reporting guidelines for Non-Departmental Public Bodies. We published details of our governance and scheme of delegation on the TRA website at <https://tinyurl.com/2kkm3wkd> including Board Members' declarations

of interests. We also published our Corporate and Business Plans which sets out how we will prioritise engagement with our stakeholders. In addition, the Board's Audit and Risk Assurance Committee has oversight of the development of a Governance Assurance Map for the TRA.

## Recommendation 9

*Transparency will be critical if the TRA is to gain the confidence of UK domestic producers and consumers, and to demonstrate compliance with WTO rules. It should be a priority for the Board when it is establishing its processes and planning its first annual report. (Paragraph 55)*

### Trade Remedies Authority's response

Once again, we agree with the Committee's recommendation. The TRA Corporate Plan and Business Plan, which we published on 1 June, set out our strategic goals for the next three years and our corporate priorities for the ten months ahead. The Trade Act 2021 stipulates that we should publish our first annual report for the period (22 months) ending 31 March 2023, which will explain the measures of success set by the Board and how the TRA has performed against them. As part of our reporting requirements, we will fully meet the expectations placed on Non-Departmental Public Bodies by the Financial Reporting Manual.

Transparency is one of the guiding principles for the UK trade remedies regime set by the Taxation (Cross-border Trade) Act 2018, in particular, to "balance the need to protect commercially confidential data whilst ensuring that relevant information about cases is accessible to interested parties and that there is accountability for decision-making".

Our Corporate and Business Plans explain how we will operationalise the trade remedies regime. Two of our four strategic goals emphasise engagement with users of the Trade Remedies Service and with broader stakeholders. We have made our files public, which includes copies of all the documents that we use during an investigation, which is open to everyone with an interest in the case. This ensures that everyone can follow and monitor the progress of our work. We will be investing further in our communications, engagement and outreach capability.

Our approach to the recent steel safeguard transition review illustrates our commitment to transparency and engagement. Despite operating to a tight timetable we built in a short period for interested parties to comment on our Statement of Intended Preliminary (SIPD). In the light of representations made to us, we then made major changes to our recommendations. Category 25 (large welded tubes, used among other things for offshore wind-farms and in the energy sector) was originally set to be revoked. Having assessed further comments and evidence on this category, we recommended it should be extended. We also received evidence that extending the application of the measure on Category 15 (stainless wire rod, used in a wide range of industries including automotive and oil/gas pipelines) would hinder the growth of downstream industries which use these products and would face increased costs if imports exceeded the allocated quota. The only known UK producer of stainless wire rod was supportive of the measure being revoked for this reason. We therefore recommended revocation of this measure.

## Recommendation 20

*Good working relationships between the TRA and HMRC will be important to the effective functioning of the UK trade remedies regime. We ask that the TRA write to us, within three months of its formal establishment, to explain how the two bodies are working together to support the operation of the regime. (Paragraph 115)*

### Trade Remedies Authority's response

Building a strong relationship between the TRA and HMRC is critical for the TRA to access the right data to inform trade remedy investigations and reviews, within the powers set for both organisations. The TRA can access disclosive consignment level (10 digit) trade data held by HMRC to identify trade flows for specific commodities under powers granted by the Trade Act 2021. This data is critical for investigations and monitoring the effectiveness of measures implemented. The data is currently provided on an ad hoc basis since the HMRC trade surveillance data feed was decommissioned in 2020. The TRA will be inputting into HMRC as they develop a replacement system for the trade surveillance data feed, with the aim of building a longer-term data sharing pipeline to enable automated transfers of trade related data at the 10-digit level. In parallel we will be identifying and developing ways to innovate sharing and use of trade data effectively and securely, as well as working together on shared policy challenges such as identifying circumvention. We are working with HMRC to develop this pipeline, including fortnightly meetings at working level to build the new data feed and maintain our ad hoc arrangements. We will continue to meet regularly with HMRC at ExCo level to maintain senior oversight and pace.