



International Steel Trade Association

3rd Floor, Ironmonger's Hall

Shaftesbury Place

London

EC2Y 8AA

Email: Simone.draper@ista-steel.com

Tel: 07534790485

12th November 2025

Request Tariff Rate Quota Review for Safeguard Measures on
Aluzinc – Tariff Heading 7210610020 and
Aluminised Steel Products – Tariff Heading 7210690080

1. No Domestic Production: Absence of a UK Like Product

The foundation of this request rests on the clear absence of any domestic production of Aluzinc or Aluminised steel in the United Kingdom.

Tata Steel UK — the principal producer of flat steel products, neither manufactures nor has any announced capacity or plans to produce these specialised coated steels.

No other UK based manufacturer produces these materials under any brand or alloy variant. In effect there is no 'like product' within the meaning of WTO definitions.

Without domestic production, imports cannot cause injury and thus there is no legal or economic basis for safeguarding measures.

2. Market Necessity: Products Are Essential and Not Substitutable

These coated products serve unique and critical industrial roles:

Aluzinc: Used in roofing, cladding, appliance housing, and light structural applications. Offers a unique combination of corrosion resistance, heat reflectivity, and surface aesthetics unmatched by other coatings (like galvanised).

Aluminised: Favoured in high-temperature environments (e.g. automotive exhaust systems, heating appliances, solar panels) due to aluminium's thermal reflectivity and oxide stability, functions galvanised, or cold-rolled steel cannot fulfil.

There is no viable one-for-one substitute produced in the UK. Domestic producers cannot meet functional, safety, or design standards required by end users for these applications.

To the best of our knowledge, neither Aluzinc nor Aluminised steel coil has been produced domestically in the UK in at least the last 20 years, and certainly not since the introduction of steel safeguard measures. This position is based on industry knowledge, publicly available product ranges from domestic producers, and the absence of any UK manufacturer marketing or supplying these products for construction, automotive, or industrial applications.

For example, UK flat steel producers, including TSUK, list no Aluzinc or Aluminised products in their published technical literature, datasheets, or product catalogues. This further supports the conclusion that these products are not domestically available and that UK downstream users are fully reliant on imported supply.

3. Aluzinc: Non-Substitutable in UK Construction Standards and Practice

Standards-Based Specification and Use

Aluzinc is explicitly referenced or incorporated within a number of UK and EU building product standards, including:

- BS EN 14782 – Self-supporting metal sheet for roofing and cladding *
- BS EN 508-1 – Roofing products with load-bearing capability *
- EN 10346 – Hot-dip coated flat products (AZ coatings) *
- NHBC Standards – Referenced in warranty-backed systems**

*Standards attached to this application – attachment no 3, 4, 5

** Attached to this application attachment no 12

These standards recognise Aluzinc's unique performance characteristics, and substitution with non-equivalent materials would breach compliance or void warranties in regulated building systems.

Long-Term Field Performance and Warranty Requirements

Aluzinc has a long-established performance record in UK construction, including 25–40 year warranties for roofing and cladding systems. Its corrosion resistance, UV stability, and thermal reflectance have been validated through decades of service and extensive third-party testing. No other material currently offers a comparable combination of long-term data, regulatory alignment, and system compatibility within these frameworks.

Surface Finish and Aesthetic Requirements

Aluzinc is selected not only for durability but also for its distinctive appearance and reflective finish, which are integral to its architectural use. These visual characteristics are often explicitly specified in project tenders, façade designs, and planning approvals. Alternative coatings or finishes do not provide the same aesthetic or material consistency, and their use would breach design intent or specification compliance.

4. Aluminised Steel Coil: Specialised, High-Temperature Product with No Equivalent

Unique High-Temperature Resistance

Aluminised steel provides heat resistance up to 650°C, far exceeding the performance of conventional coated steels. These thermal and oxidative properties are fundamental to its function and are not matched by any standard commercial coating.

Substituting this product in critical applications would create engineering and safety risks and violate specification compliance in regulated sectors.

Specification and Compliance Constraints

These applications are governed by standards such as:

- EN 10346 – Including aluminium-silicon coated product categories*
- OEM and sector-specific specifications (e.g. in automotive Tier 1 supply chains) which are specific to each OEM and not available for reproduction.

*Standard EN10346 attachment no 5

End users select aluminised steel for precise reasons tied to performance and compliance, not general corrosion resistance. There is no domestic alternative that can meet these technical specifications.

See attached a comparative Overview of Aluminized Steel and Galvanized Iron which has been provided and verified by Posco Steeleon, Korea. Attachment 1&2

5. Non Substituable for commodity grade Category 4 products

5.1 Aluzinc

- Standards + warranties lock-in:
Used where Aluzinc is explicitly specified (roofing/cladding systems with long-life warranties). Substituting into generic Cat-4 uses would not secure those warranties and offers no benefit in non-Aluzinc specified applications.
- Aesthetic/reflectance requirement: The spangled, reflective surface is chosen for visible envelopes; it's not a fit for commodity, hidden, or paint-bonded uses where plain galvanised dominates.
- Cost/pricing: Aluzinc carries a premium over conventional galvanised steel. Buyers of commodity Cat-4 coil would not pay for unnecessary performance/features.
- Thickness/finish ranges: Aluzinc supply focuses on architectural grades/finishes, not the broad thickness/width mix typical of commodity Cat-4 demand. Even if technically usable, Aluzinc is economically irrational for lower-grade Cat-4 segments and not substitutable in the reverse direction for Aluzinc specified work.

5.2 Aluminised

- Different performance domain: Engineered for high-temperature oxidation resistance (e.g., exhausts, heat shields, ovens), not general atmospheric corrosion. In typical Cat 4 "commodity" uses, aluminised offers no advantage and can be worse for paintability/appearance.
- Niche applications: It serves thermal rather than general corrosion needs; commodity Cat-4 buyers will not pay the premium.
- Specification-critical: Automotive/industrial specs call out aluminised specifically; using it to compete in low-grade building sheet would breach cost and performance expectations.
- Aluminised is not a practical or commercial substitute into lower-grade Cat-4 applications; it's a specialty thermal product.

See attached a comparative Overview of Aluminized Steel and Galvanized Iron which has been provided and verified by Posco Steeleon, Korea. Attachment 1&2

Both Aluzinc and Aluminised coil sit well above the price point of commodity Category 4 sheet. Their premium reflects unique functional properties (architectural durability in the case of Aluzinc, thermal resistance for Aluminised). This pricing gap alone prevents their use in lower grade applications meaning that their exclusion from safeguard measures would not cause injury to UK producers of other metallic coated sheet.

It makes no commercial sense to use these high grade products for commercial grade end use.

For guidance only and based on current import market conditions, the premium price on Aluzinc over Commercial grade category 4 material is £30 - £40 per metric tonne and for Aluminised it is roughly £110 - £130 per metric tonne higher than Commercial grade Category 4 material.

See attached example of Purchase Order on Confidential file document no 13

See attached example of Purchase Order on Confidential file document no 14&15

6. Change in Circumstances Since the Original Measure

The principle change since the announcement of the revised safeguarding measures commencing on 1st July 2025 significantly restricts imports from major supplier countries (including South Korea and Vietnam). These restrictions will materially alter market access conditions for UK importers and downstream manufacturers who are wholly reliant on imported supply of Aluzinc and Aluminized products.

At the time of the original safeguard introduction, there was limited differentiation between coated steel product categories. It is now clear that Aluzinc and Aluminized steels are distinct, non-substitutable speciality products used in specific industrial and construction applications, which differ fundamentally from commodity metallic-coated sheet (Category 4).

7. Expected Increase in Demand

Construction and building Systems:

Post Pandemic growth in refurbishment and light industrial construction continues to specify Aluzinc for warranty backed roofing and façade systems compliant with BSEN Standards. These specifications mandate Aluzinc's performance properties and cannot be substituted without breaching warranty or certification requirements

Industrial and Engineering Applications:

Aluminised Steel remains essential in manufacturing heat-handling equipment, automotive exhaust components, and heating appliances – uses that cannot be met by any domestic product or alternative coating.

Securing of Supply:

The combination of restricted TRQs and the absence of any UK production base means importers face the risk of paying 25% safeguarding duty once the TRQs have been exceeded which they surely will. This creates real risk of disruption for UK manufacturers dependant on this material and presents the danger of security of supply in areas where we are expecting demand to increase – for example in solar panels which the UK will be further investing in to meet zero carbon projections.

Construction growth:

UK Construction output and refurbishment spending are forecast to rise through 2025-2026, especially in non-residential and industrial building – both of which use Aluzinc. CPA Construction Industry Forecasts Spring 2025 Attached. Attachment No. 11

These developments constitute a clear and material change in market circumstances since the original safeguard was applied. Maintaining the current measures would constrain supply, increase input costs for UK manufacturers and undermine competitiveness in key downstream sectors – without any offsetting benefit to domestic steel producers.

Measures making importing of these products prohibitive will unfortunately, we fear, lead to the imports of finished goods.

Import patterns show stable or demand-driven volumes, not surges, reflecting supply chain necessity — not market distortion.

8. Import figures of category 4 including imports from developing countries under residual TRQs.

Spreadsheet attached – attachment no. 10. Data supplied by Trade Data Monitor TRQs taken from

- Trade Remedies Notice 2021/01 Safeguard measures Extract attached No 6
- Trade Remedies Notice 2022/01 Safeguard measures Extract attached No 7
- Trade Remedies Notice 2023/10 Safeguard measures Extract attached No 8
- Trade Remedies Notice 2024/06 Safeguard measures Extract attached No 9

9. No Risk of Injury – In Fact, a Benefit to UK Manufacturing

The absence of domestic supply, combined with consistent industrial demand, means that continued safeguarding only harms downstream UK manufacturers, without benefiting domestic steel producers.

Quotas limit access to critical materials, which drives up costs for UK downstream manufacturers which in turn encourages offshoring of production — exactly the opposite of UK industrial strategy.

Lifting safeguards would increase competitiveness and resilience for UK downstream manufacturers in multiple sectors: construction, solar panels, white goods, and automotive supply chains.

10. TRA's Own Principles Support Targeted Removal

Per discussions with TRA officials and previous TRA publications, safeguarding should only apply where:

- There is a like product domestically produced.
- There is actual or potential injury.
- Safeguarding is in the economic interest of the UK.

In this case:

- There is no like product
- There is no injury
- There is only harm, not benefit, to UK industrial users

It would therefore be entirely consistent with the TRA's statutory remit and public interest duty to remove safeguards on these two commodity codes.

11. Conclusion and Formal Request

We request the removal of safeguard measures on the following commodity codes:

- 7210610020 – Aluzinc (Aluminium-Zinc coated flat steel)
- 7210690080 – Aluminised flat steel (Aluminium or Aluminium-silicon coated)

These products are not produced in the UK. They serve critical, non-substitutable functions in downstream UK Industries. Removing them from safeguarding measures would not cause injury to UK steel manufacturers and are currently constrained by quota, limiting industrial competitiveness.

Attachments:

1. Overview of Aluminized and Galvanized steel
2. Verification of Overview of Aluminized and Galvanized steel of Posco Steeleon, Korea
3. BS EN 14782 – Self-supporting metal sheet for roofing and cladding
4. BS EN 508-1 – Roofing products with load-bearing capability
5. EN 10346 – Hot-dip coated flat products (AZ coatings)
6. Trade Remedies Notice 2021/01 Safeguard measures
7. Trade Remedies Notice 2022/01 Safeguard measures
8. Trade Remedies Notice 2023/10 Safeguard measures
9. Trade Remedies Notice 2024/06 Safeguard measures
10. Import Statistics of Category 4 for 2022, 2023 and 2024
11. CPA Construction Industry Forecasts Spring 2025
12. NHBC Standard
13. Purchase order
14. Purchase order
15. Purchase order