



Trade Remedies
Authority

Tariff Rate Quota Review on Category 4 steel products

Case TQ0085

Final Determination and Recommendation

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A Summary

A1 Introduction

1. This Tariff Rate Quota (TRQ) review considered whether the TRQ to which category 4 steel products (metallic coated sheet) are subject should be varied. The application, which originally identified the change in circumstances and proposed a change, was published on 24 February 2026 and is available on the [public file](#).
2. For further guidance and information regarding reviews of safeguard measures, of which TRQ reviews are one example, please see our [public guidance](#).

A2 Legal framework

3. The Trade Remedies Authority (TRA)'s final determination and recommendation are made pursuant to regulations 35B(7)(b) and 37(1) of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (as amended) (the Regulations). In accordance with regulation 37(4) of the Regulations, this document includes:
 - a. a description of the goods to which the recommendation relates;
 - b. the reasons for its recommendation;
 - c. whether there is any information which we consider is likely to be relevant to the Secretary of State for Business and Trade (the Secretary of State)'s decision as to whether it would not be in the public interest to accept this recommendation; and
 - d. whether there is any other information we consider relevant.

A3 About this review

4. This is a TRQ review of a trade remedy measure under regulation 35B of the Regulations. As per regulation 35B(1) of the Regulations, the TRA may conduct a TRQ review where it is satisfied that there is sufficient information indicating that there may have been a change of circumstances since the application of the TRQ.
5. In conducting a TRQ review, the TRA must determine whether there has been a change

in circumstances since the application of the relevant TRQ (see regulation 35B(6)(b) of the Regulations).

6. Regulation 35B(9)(f) of the Regulations states that a change of circumstances may, among other things, be the fact that imports from a developing country member of the World Trade Organization (WTO) which have been excluded from the application of the tariff rate quota can no longer be excluded under regulation 43 (developing country exception - DCE).
7. On 24 February 2026, the TRA initiated a TRQ review, noting that it had been provided with trade data which indicated that there may have been a change of circumstances which corresponds with the provision in regulation 35B(9)(f) of the Regulations, namely that import levels of the goods subject to review from Türkiye (a WTO developing country member) had changed since the application of the measure. Therefore, this TRQ review has considered whether the quota to which the goods subject to review are subject should be varied by changing the DCE status of Türkiye. The goods subject to review are detailed in [Section C2 - Scope](#).
8. Regulation 43 of the Regulations provides an exception from the application of a safeguarding measure to imports from a developing country member of the WTO whose individual share of total imports of the goods subject to review into the UK does not exceed 3%.
9. A developing country member of the WTO who accounts for less than 3% of total imports is described as a 'low volume exporter' (LVE). Additionally, they are only excepted from the application of the safeguarding measure as long as all LVEs collective share of total imports into the UK, of the goods subject to review, does not exceed 9% of the total imports of the goods subject to review into the UK.
10. Türkiye currently holds LVE status and initial indications from UK import trade data suggested that Türkiye's imports exceeded the 3% threshold, and therefore the measure should be varied by applying the TRQ to Türkiye.
11. Regulation 44 of the Regulations also provides for another exception, allowing the TRA to except the goods originating in a foreign country or territory from:
 - a) its assessment of the importation of the goods into the UK in increased quantities;
 - b) its assessment of serious injury to UK producers; and

- c) a recommendation to apply a safeguarding remedy.
12. This exception is available where that foreign country or territory and the UK (or European Union (EU), immediately before EU exit day) were signatories to a free trade agreement (FTA) providing for the exception of goods from the application of a safeguard measure. The FTA partners that benefit from this exception are listed in Annex 1. Türkiye is not an FTA partner benefiting from an exception under regulation 44 of the Regulations.
13. After the initiation of the review, parties were invited to comment by 08 March 2026 on:
- a) the LVE status of Türkiye;
 - b) the intention of the TRA regarding the expansion of the matters to be considered with this TRQ review (to include other LVE countries) and;
 - c) the intended final determination.
14. On 3 March 2026 we published a [note to the public file](#) that outlined our change to the proposed intended final determination that had originally been described in the [Notice of Initiation](#) (NoI).

B Background and initiation

B1 Background to the safeguard measure

15. Details of the safeguarding measure currently imposed, including the TRQs (also referenced in Annex 3), are set out in [Trade remedies notice 2025/12](#).

B2 Registered parties

16. When the TRA initiated this TRQ review, it provided an opportunity for parties to register their interest and provide comments on the application, the expansion of the matters to be considered and intended final determination. In addition to the applicant (Tata Steel) we had nine parties registered an interest in the review. Details of the registered parties are given in the table below, together with a link to their submissions which are available on the public file. TatMetal Çelik Sanayi ve Ticaret A.Ş. (TatMetal) also submitted an additional submission after their registration but within the registration period, that can be

found [here](#).

Table 1. Interested Parties who registered an interest in the review

Registered party	Category	Link to submission
EEF LIMITED (part of Make UK)	UK Trade Association	Link
International Steel Trade Association	International Trade Association	Link
The Ministry of Trade of Republic of Türkiye	Foreign Government	Link
TatMetal Çelik Sanayi ve Ticaret A.Ş.	Exporter	Link
Tezcan Galvanizli (Tezcan Galvaniz)	Exporter	Link
Borçelik Çelik Sanayi Ticaret A.Ş.	Exporter	Link
Salzgitter Mannesmann UK Limited	Importer	Link
Duferco UK Limited	Importer	Link
OPR Services Ltd	Importer	Link

17. Turkish exporters TatMetal and Tezcan Galvaniz stated within their submissions that the TRA should assess whether any apparent increase in imports is sustained and structural and should avoid placing undue weight on short-term spikes or temporary market factors. Turkish exporters, TatMetal and Borçelik Çelik Sanayi Ticaret A.Ş. both argued for Türkiye to remain on their DCE status.
18. We would like to reiterate that DCE status is reliant on the specific country staying within the expected import limits set out within the Regulations. If this is not the case, we may review the status of the country.
19. OPR Services Limited, an importer of metallic coated sheet into the UK, stated within their submission that they would like us to consider at least a 3 month notice period to any proposed changes in TRQs to prevent disruption to supply chains and production schedules. In this instance, the last opportunity to amend the current safeguard measure TRQs is 1 April 2026 before the measure as a whole expires on 30 June 2026.
20. The recommendation within this determination has attempted to mitigate against disrupting established supply chains that have been established through traditional trade flows with the use of a country specific quota for Türkiye ([see section D2.3 Results](#)).
21. Tezcan Galvaniz also requested an exporter-based quota which we are not in our power to grant within a safeguard measure.

C Review process

C1 Overview

22. To identify whether there had been a change of circumstances since the application of the TRQ to the goods subject to review, the Period of Investigation (POI) was set as 1 January 2025 to 31 December 2025. This is the most recent 12-month period prior to initiation of the review. By conducting the analysis over a 12-month period, the TRA was able to identify representative trade patterns for the products in scope and minimise distortions based on fluctuations of trade at different times of the year.

C2 Matters considered

C2.1 Goods Subject to Review

23. The goods subject to review are defined in regulation 2 of the Regulations as ‘the goods described in the notice of initiation of a review’. The goods subject to review described in the NOI to this TRQ review are:

Category 4 steel products – metallic coated sheet

24. The goods subject to review are subject to the following tariff classifications:

7210 2000
7210 4100
7210 4900
7210 6100
7210 6900 20
7210 6900 80
7210 9080
7212 2000
7212 3000
7212 5020
7212 5030
7212 5040
7212 5061
7212 5069
7212 5090
7225 9100
7225 9200
7225 9900
7226 9910
7226 9930

C2.2 Countries

25. This review considers the volume of UK imports of the goods subject to review from Türkiye and all other developing country members of the WTO. Pursuant to regulation 36(1) of the Regulations, we considered it appropriate to expand the number of countries to be considered in this review because the methodology used to examine Turkish import volumes of goods subject to review would also mean considering the volume of those imported goods from other DCE countries and any changes in volume would need to be assessed. We received no comments on the proposal to expand the matters to be considered beyond just Türkiye, as proposed in the Notice of Initiation. Developing country members of the WTO considered in this TRQ review are listed in **Annex 2**.

C2.3 Summary of facts considered - HMRC data

26. To analyse trade flows in this TRQ review, we have used 8-digit Customs Declarations data published by His Majesty's Revenue and Customs (HMRC).
27. The dataset used in this review includes country of origin data for the majority of UK imports apart from imports from the EU into Northern Ireland, due to differences in which the latter data is collected. Country of origin data provides a more accurate picture of where imports originate from than country of dispatch data. Country of dispatch relates to the country the goods were exported from, which may differ from the country of origin. HMRC publishes country of origin (as well as country of dispatch) information for imports of UK goods at 8-digit level, however country of origin information is only available in HMRC's bulk data sets, [published here](#).
28. For the purposes of this review, we have used 20 of the 21 commodity codes referenced in paragraph 24. We have excluded code '7210 6900' as this would include some products that are out of scope of the safeguard measure, at an 8-digit level. The 8-digit excluded code only accounts for just over 2% of the total imports during the POI for the goods subject to review and therefore would not impact on our final recommendation.

D Change in circumstances - Developing country exception

D1 Background

29. Under regulation 35B(9)(f) of the Regulations, a change to the import share of a developing country may constitute a change of circumstances. Under regulation 43 of the Regulations, the TRA must not recommend the application of a safeguarding remedy to imports from a developing country member of the WTO accounting for 3% or less of the total imports of those goods into the UK (i.e., a LVE country) during the POI, unless the imports from all LVEs collectively account for more than 9% of the total imports of the goods subject to review into the UK.
30. The application received by the TRA contained information which indicated that there may have been a change of circumstances which corresponds with the provision in regulation 35B(9)(f) of the Regulations, namely that import levels from Türkiye (currently an LVE excepted from the application of the Category 4 TRQ) have changed since the application of the measure.

D2 Methodology

D2.1 Establishing FTA/EPA exception

31. The calculations of import shares used in this review do not include the import volumes of those developing countries who were excepted from the safeguard measure under regulation 44 (Other exception) of the Regulations, where a country with an FTA has a global safeguard exception clause.
32. The only active agreements for the purposes of the exception in regulation 44 of the Regulations are with Kenya and the CARIFORUM countries listed in **Annex 1**. Imports from these countries were not included in any calculations due to their exception from the safeguard measure. Kenya will lose their signatory country exemption on 21 March 2026, instead moving to a developing country exception.

D2.2 Import shares

33. For the goods subject to review, we examined import figures during the POI to determine the import shares of each developing country without an FTA exception.
34. For those countries whose share of imports into the UK for the period 1 January 2025 to

31 December 2025 did not exceed 3% for the goods subject to review, we also assessed whether the collective imports exceeded 9% for the goods subject to review.

D2.3 Results

35. The TRA examined HMRC UK import data for the goods subject to review covering the 12-month period, January 2025 to December 2025. This data stated that Türkiye exported to the UK approximately 54,000 tonnes of metallic coated sheet in the final quarter of 2025 alone, which was equivalent to 18% of the total UK imports of metallic coated sheet over that period. Individual volumes and UK import share for Türkiye and other WTO developing countries for the whole 12-month period are given in table 2 below.

Table 2. WTO developing country import volume and share (Jan 2025 – Dec 2025)

Country	Import volume of metallic coated sheet into the UK (tonnes)	% of total imports of metallic coated sheet into the UK
Vietnam	125,526	13.12%
Türkiye	67,848	7.09%
India	42,878	4.48%
People's Republic of China	1,699	0.18%
United Arab Emirates	104	0.01%
Thailand	103	0.01%
Indonesia	2	0%
Hong Kong	Less than 1	0%
Mexico	Less than 1	0%

Source: HMRC Country of Origin import data

36. The analysis indicates that there has been a change in circumstances which corresponds with the provisions in regulation 35B(9)(f) of the Regulations. The data indicates that import levels of the goods subject to review from Türkiye, currently excluded from application of the Category 4 TRQ, now account for substantially more than 3% of total imports into the UK. Collectively, the remaining LVEs did not breach the 9% threshold.
37. Although India, a developing country member of the WTO, exceeded the 3% threshold, it has an individual status under the TRQ applicable to Category 4 goods. India has been allocated an individual specific quota due to historic import volumes into the UK. India has historically exported to the UK in volumes above the 3% threshold for DCE countries.
38. Vietnam, also a developing country member of the WTO, also exceeded the 3% threshold

during the POI, but currently has access to the residual quota and a 15% cap on exports per quarter, again due to historic import volumes.

39. The TRA expanded the matters to be considered (see paragraph 25) and examined the import levels from these and all the WTO developing countries to ensure all have the appropriate status going forward with regards to being within or over the 3% threshold.
40. Table 3 below shows the UK import shares of the goods subject to review of specific WTO developing countries that have exceeded the 3% threshold during the POI and what their recommended status should be going forward as a result of this review.

Table 3. WTO developing country non-exceptions (based on import share %, Jan 2025 – Dec 2025)

Product category	Country Specific Quota	Residual Quota
4	India (4.48%), Türkiye (7.09%)	Vietnam (13.12%)

41. Under regulation 35B(6)(c)(ii) of the Regulations, in conducting a TRQ review, the TRA may consider the desirability of maintaining, as far as possible, traditional trade flows, by allocating a country-specific quota. As with previous country-specific TRQ allocations by the TRA with respect to the safeguard measure on certain steel products, the 2017-2019 period is deemed to be representative of traditional trade flows, given that the UK trade flows during this period were not affected by the impact the COVID-19 pandemic had on international trade from the beginning of 2020, nor by the effect of the implementation of the safeguard measure in the UK.
42. It should be noted that a country specific quota is allocated to countries if their UK import share exceeds 5% during the representative period of 2017-2019. The percentages in Table 3 reflect the import shares during the POI for this review. The country listed under the 'Residual Quota' column had a UK import share higher than 3% during the POI but did not exceed the 5% share of UK imports of metallic coated sheet during the representative period. Those in the 'Country Specific Quota' did exceed 5% during the representative period.
43. As a consequence, the TRA recommends that Türkiye should no longer receive DCE status and should now have access to a country-specific quota for metallic coated sheet. Due to the TRA's recommendation to continue progressive liberalisation of the safeguard measure at a rate as determined by the SoS and confirmed within the [published 2025/12 notice](#) on

30 June, the individual quota amount for Türkiye has been increased by 0.1% per quarter since the March-June 2025 allocation, in line with other quotas. Other quota amounts have been unaffected by Türkiye's individual allocation and are shown in Annex 3 'Tariff Rate Quotas'.

44. India should remain on their current quota due to the results of the examination of the current and historic import volumes.

D3 Conclusions on Türkiye and other developing countries

45. The analysis of UK imports over the POI from developing countries shows that three developing countries, India, Vietnam and Türkiye, should not be excepted from the safeguard measure because their share of UK imports exceeded the 3% threshold on category 4 goods. India and Vietnam should therefore continue to access the TRQ as is currently the case.

E Final Determination

46. For the reasons set out already in this document, and pursuant to regulations 35B(7)(b) and 37(1) of the Regulations, the TRA's final determination in this TRQ review and its recommendation to the Secretary of State, is to vary the TRQ. This is to ensure that imports of the goods subject to review originating in Türkiye are no longer excepted from the application of the safeguarding measure, and Turkish imports of category 4 steel goods should now have access to a country-specific quota.
47. The TRA has found no information it considers likely to be relevant to the Secretary of State's decision as to whether it would not be in the public interest to accept the TRA's recommendation to vary the TRQ, or any other information it would consider relevant.
48. The varied TRQ should take effect on the day after the date of publication of any public notice made under section 13 of the Taxation (Cross-border Trade) Act 2018 giving effect to this recommendation.

Annex 1 FTA partners with a current safeguard exception

Agreement	Multilateral safeguard exception
UK – Kenya ¹	Active
UK-CARIFORUM EPA (Antigua and Barbuda, Barbados, Belize, the Bahamas ² , Dominica, Dominican Republic, Grenada, Guyana, Jamaica, Saint Christopher (Kitts) and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Suriname, and Trinidad and Tobago)	Active
SACUM-UK EPA (Botswana, Eswatini, Lesotho, Namibia, South Africa and Mozambique) ³	Active

¹ As noted earlier, Kenya will lose their signatory country exemption on 21 March 2026, instead moving to a developing country exception.

² Not a WTO member

³ From 1 January 2026, these countries gained a signatory country exemption moving over from the developing country exception.

Annex 2⁴ Developing country members of the WTO

Afghanistan, Albania, Angola, Antigua and Barbuda, Argentina, Armenia, Bahrain, Bangladesh, Barbados, Belize, Benin, Bolivia, Botswana, Brazil, Brunei Darussalam, Burkina Faso, Burundi, Cabo Verde, Cambodia, Cameroon, Central African Republic, Chad, Chile, Colombia, Congo, Costa Rica, Côte d'Ivoire, Cuba, Democratic Republic of the Congo, Djibouti, Dominica, Dominican Republic, Ecuador, Egypt, El Salvador, Eswatini, Fiji, Gabon, Gambia, Georgia, Ghana, Grenada, Guatemala, Guinea, Guinea-Bissau, Guyana, Haiti, Honduras, Hong Kong, India, Indonesia, Jamaica, Jordan, Kazakhstan, Kenya, Kuwait, Kyrgyz Republic, Lao People's Democratic Republic, Lesotho, Liberia, Macao, Madagascar, Malawi, Malaysia, Maldives, Mali, Mauritania, Mauritius, Mexico, Moldova, Mongolia, Montenegro, Morocco, Mozambique, Myanmar, Namibia, Nepal, Nicaragua, Niger, Nigeria, North Macedonia, Oman, Pakistan, Panama, Papua New Guinea, Paraguay, Peru, Philippines, People's Republic of China⁵, Qatar, Rwanda, Saint Christopher (Kitts) and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, Saudi Arabia, Senegal, Seychelles, Sierra Leone, Solomon Islands, South Africa, Sri Lanka, Suriname, Tajikistan, Tanzania, Thailand, Togo, Tonga, Trinidad and Tobago, Tunisia, Türkiye, Uganda, Ukraine, UAE, Uruguay, Vanuatu, Venezuela, Vietnam, Yemen, Zambia, Zimbabwe.

⁴ Some of the above countries have been excluded from the calculation because of the FTA/EPA agreements listed in Annex 1

⁵ Please note that the PRC has announced in September 2025 that “as a responsible major developing country, China will not seek new special and differential treatment in the current and future WTO negotiations.” It has not affected the status of the PRC as a developing country member in the WTO.

Annex 3 Tariff Rate Quotas

Quarterly volumes of country and residual tariff-rate quota (in tonnes) 01/07/25 – 30/06/26

Product category	Country	01/07/2025 to 30/09/2025	01/10/2025 to 31/12/2025	01/01/2026 to 31/03/2026	01/04/2026 to 30/06/2026
4	EU	324,154	324,154	317,107	320,630
	Taiwan	33,513	33,513	32,785	33,149
	India	24,752	24,752	24,213	24,482
	Türkiye	-	-	-	24,413
	Residual	85,595	85,595	83,735	84,665
	Residual 15% cap for any individual exporting country	12,839	12,839	12,560	12,700
	Total	468,014	468,014	457,840	487,339