



Trade Remedies  
Authority

# **Tariff Rate Quota Review on Category 13 Steel Products**

## **Case TQ0072**

### **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 13 steel products (rebar) are subject should be varied. The application, which originally identified the change in circumstances and proposed a change, was published on 10 November 2025 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), 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'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 10 November 2025, 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 Vietnam (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 Vietnam. 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 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. These 'low volume exporters' (LVE) are excepted from the application of the safeguarding measure as long as their 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. Vietnam currently holds LVE status and initial indications from UK import trade data suggested that Vietnam's imports exceeded the 3% threshold, and therefore the measure should be varied by applying the TRQ to Vietnam.
10. 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 serious injury to UK producers' assessment; and
  - c) a recommendation to apply a safeguarding remedy.
11. 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. Although the UK and Vietnam are both part of the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), this agreement does not except Vietnam from the application of a safeguard measure.

12. After the initiation of the review parties were invited to comment by 20 November 2025 on:
  - a) the LVE status of Vietnam;
  - 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 .

## **B Background and initiation**

### **B1 Background to the safeguard measure**

13. 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**

14. 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. EEF Limited (UK Steel) were the only party who registered to this review. Their submission is available on the [public file](#).

## **C Review process**

### **C1 Overview**

15. To identify whether there had been a change of circumstances since the application of the TRQ to the goods subject to review, the POI was set as 1 October 2024 to 30 September 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**

16. 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 13 steel products – rebar

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

72142000 and 72149910

### **C2.2 Countries**

18. This review considers the volume of UK imports of the goods subject to review from Vietnam 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 Vietnamese 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 Vietnam, 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**

19. 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).
20. 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 the way the 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](#).

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## **D Change in circumstances - Developing country exception**

### **D1 Background**

21. 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), 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.
22. 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 Vietnam (currently an LVE excepted from the application of the Category 13 TRQ) have changed since the application of the measure.

### **D2 Methodology**

#### **D2.1 Establishing FTA/EPA exception**

23. 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.
24. 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.

## D2.2 Import shares

25. 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.
26. For those countries whose share of imports into the UK for the period 1 October 2024 to 30 September 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

27. The TRA examined HMRC UK import data for the goods subject to review covering the 12-month period, October 2024 to September 2025. This data stated that Vietnam exported to the UK approximately 21,184 tonnes of rebar in July 2025 alone, which was equivalent to 5.53% of the total UK imports of rebar over the period (total for all countries being 382,940 tonnes). Other WTO developing country import shares are given in table 2 below.

**Table 2. WTO developing country import volume and share (Oct 2024 – Sept 2025)**

Country	Import volume of rebar into the UK (tonnes)	% of total imports of rebar into the UK
China	33	0.01
Egypt	29,383	7.67
India	3	0
Kuwait	1	0
Thailand	440	0.12
Türkiye	146,003	38.13
Vietnam	21,184	5.53

28. 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 Vietnam, currently excluded from application of the Category 13 TRQ, now account for substantially more than 3 per cent of total imports into the UK. Collectively, the remaining LVEs did not breach the 9% threshold.
29. Certain developing country members of the WTO have individual status under the TRQ applicable to Category 13 goods. Türkiye has been allocated an individual specific quota due to historic import volumes into the UK. Additionally, Egypt, although a developing

country, is not exempted from the measure and currently has access to the residual quota, again due to historical import volumes into the UK. These two countries have historically exported to the UK in volumes above the 3% threshold for DCE countries. The TRA expanded the matters to be considered (see paragraph 16) 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.

30. 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 %, Oct 2024 – Sept 2025)**

Product category	Country Specific Quota	Residual Quota
13	Türkiye (38.13%)	Egypt (7.67%), Vietnam (5.53%)

31. 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, even when a DCE country’s UK import share exceeds 3%. Otherwise, the relevant country will be provided with access to the residual 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.
32. A country specific quota is only allocated if the 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. Those countries in the ‘Residual Quota’ column all had a UK import share higher than 5% during the POI but did not exceed the 5% share of UK imports of rebar during the representative period.

### **D3 Conclusions on Vietnam and other developing countries**

33. The analysis of UK imports over the POI from developing countries shows that three developing countries, Türkiye, Egypt and Vietnam, should not be excepted from the safeguard measure under DCE status because their share of UK imports exceeded the 3% threshold on category 13 goods. Türkiye and Egypt should therefore remain on their current TRQs, and Vietnam should now have access to the residual quota.

## **E Final Determination**

34. 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 so that imports of the goods subject to review originating in Vietnam are no longer excepted from the application of the safeguarding measure, and Vietnamese imports of category 13 steel goods should now have access to the residual quota.
35. 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.
36. 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	Active
UK-CARIFORUM EPA (Antigua and Barbuda, Barbados, Belize, the Bahamas <sup>1</sup> , Dominica, Dominican Republic, Grenada, Guyana, Jamaica, Saint Christopher (Kitts) and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Suriname, and Trinidad and Tobago)	Active

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<sup>1</sup> Not a WTO member

## **Annex 2<sup>2</sup> 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 China, 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.

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<sup>2</sup> Some of the above countries have been excluded from the calculation because of the FTA/EPA agreements listed in Annex 1

## 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
13	EU	74,521	74,521	72,902	73,712
	Türkiye	35,304	35,304	34,538	34,921
	Residual	24,037	24,037	23,514	23,774
	Residual 20% cap for any individual exporting country	4,807	4,807	4,703	4,755
	Total	133,862	133,862	130,954	132,407

Note: The quarterly quotas change in the third and fourth quarters (starting 01/01/26 & 01/04/26) because each quota is calculated by the number of days in each quarter. The number of days vary in these instances.