



Trade Remedies  
Authority

# **Tariff Rate Quota Review**

**Case TQ0077**

**Final Determination**

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## Section A: Summary

### A1. Introduction

1. This tariff rate quota (TRQ) review concerns the safeguard measure applying to category 4 and category 7 steel products. The [Notice of Initiation](#) (NOI) was published on 14 January 2026. The scope of the goods subject to review is defined in section C2.2 Goods Subject to Review.
2. The Statement of Intended Final Determination (SIFD), which set out the essential facts that the Trade Remedies Authority (TRA) established during this TRQ review, was published on 13 February 2026 and is available on the public file.
3. Interested parties made submissions in response to the SIFD via the Trade Remedies Service (TRS). These submissions have been addressed in this final determination.
4. For further guidance and information regarding TRQ reviews, please see our [public guidance concerning reviews of safeguard measures](#).

### A2. Legal framework

5. This final determination is made pursuant to regulation 35B(7)(a) of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (as amended) (the Safeguard Regulations).

### A3. About this review

6. This is a TRQ review of a trade remedy measure under regulation 35B of the Safeguard Regulations. As per regulation 35B(1) of the Safeguard 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 circumstance since the application of the tariff rate quota.
7. On 14 January 2026, the TRA initiated this TRQ review following receipt of two separate applications, one submitted by the International Steel Trade Association (ISTA) and one by Babcock International Group (Babcock). Both of these applications included information indicating that there may have been a change of circumstances which

corresponds with the provisions in regulation 35B(9)(a) and regulation 35B(9)(e) of the Safeguard Regulations, namely that the tariff rate quota, or any part of the quota, has been exhausted, and the impact of the tariff rate quota on traditional trade flows.

8. The Period of Investigation (POI) for the review to assess the change in circumstances is 1 October 2024 to 30 September 2025. The representative period for assessing traditional trade flows is the period of 1 July 2017 to 30 June 2018.
9. On 13 February 2026, the TRA published the SIFD. The SIFD was made pursuant to regulations 29 and 36(4A) of the Safeguard Regulations. It included:
  - the final determination that the TRA intended to make;
  - a summary of the facts considered during the review; and
  - details of the facts and analysis forming the basis of the intended determination.
10. Parties were invited to make comments to the SIFD by 23 February 2026. Comments to the SIFD are summarised in section C3.2 Comments and addressed in the relevant sections below.

## Section B: Background and initiation

### B1. Summary

11. Details of the measure currently imposed, including the tariff rate quotas, are set out in:
  - [Trade remedies notice 2025/12: Safeguarding measure: tariff-rate quota on steel goods](#)
12. The TRA received TRQ review applications relating to Category 4 and 7 of the steel safeguards measure from ISTA (a UK trade association of importers of the goods subject to review) alleging there has been a change in circumstances since the application of the TRQ. The TRA assessed that the application contained sufficient evidence indicating that there may have been a change in circumstances since the application of the TRQ to categories 4 and 7 to justify initiating a TRQ review, in accordance with Regulation 35B(1) of the Safeguard Regulations.
13. The TRA also received a TRQ review application relating to Category 7 of the steel safeguards measure from Babcock (a UK importer of the goods subject to review) alleging there has been a change in circumstances since the application of the TRQ. The TRA assessed that the application contained sufficient evidence indicating that there may have been a change in circumstances since the application of the TRQ to category 7 to justify initiating a TRQ review, in accordance with Regulation 35B(1) of the Safeguard Regulations.
14. The TRA has combined the matters raised by ISTA and Babcock (“the applicants”) in this TRQ review due to the overlap in the goods subject to review and to support operational efficiencies.
15. This TRQ review has considered whether the tariff rate quotas to which certain steel products are subject should be varied. The goods subject to review is defined in section C2.2 Goods Subject to Review.

### B2. Interested parties and contributors

16. When the TRA initiated this TRQ review, it provided an opportunity for parties to register their interest and provide comments. A list of registered interested parties and contributors are set out in this table:

**Table 1: Interested parties and contributors registered to the review TQ0077**

<b>Name</b>	<b>Abbreviation</b>	<b>Category</b>	<b>Submission(s)</b>
International Steel Trade Association	ISTA	Applicant / Trade association	Application
			Application amendment
			SIFD comments (x2)
Babcock International Group	Babcock	Applicant / Importer of goods subject to review	Application
			Registration form
Tata Steel UK Limited	TSUK	Domestic producer of like or directly competitive goods	Registration of interest
			SIFD comments
Spartan Steel Ltd	Spartan	Domestic producer of like or directly competitive goods	Registration of interest
			SIFD comments
Liberty Steel Dalzell Ltd	Liberty Dalzell	Domestic producer of like or directly competitive goods	Registration of interest
Nam Kim Steel Joint Stock Company	NKSJSC	Exporter of goods subject to review	Registration of interest
Hoa Sen Group	Hoa Sen	Exporter of goods subject to review	Registration of interest
			SIFD comments
Ton Dong A Corporation	TDAC	Exporter of goods subject to review	Registration of interest
Pomina Flat Steel Joint Stock Company	PFSJSC	Exporter of goods subject to review	Registration of interest
TVP Steel Trading Joint Stock Company	TVP STJSC	Exporter of goods subject to review	Registration of interest
POSCO	POSCO	Exporter of goods subject to review	Registration of interest
China Steel Corporation (Taiwan)	CSC Taiwan	Exporter of goods subject to review	Registration of interest
POSCO STEELCON	POSCO STEELCON	Overseas producer of products in category 4	Registration of interest
			SIFD comments
HPPS	HPPS	Overseas producer of products in category 4	Registration of interest
TVP Steel Joint Stock Company	TVP SJSC	Overseas producer of products in category 4 and 7	Registration of interest
Target Steel Ltd	Target Steel	Importer of goods subject to review	Registration of interest
Steel & Alloy Processing Limited	S&A Processing	Importer of goods subject to review	Registration of interest

B.A. Steels Ltd	BA Steels	Importer of goods subject to review	Registration of interest
SSAB Swedish Steel Limited	SSAB	Importer of goods subject to review	Registration of interest
Sebden Steel Service Centres Ltd	Sebden	Importer of goods subject to review	Registration of interest
Belmont & Knott Ltd	Belmont & Knot	Importer of goods subject to review	Registration of interest
Brown McFarlane Limited	Brown McFarlane	Importer of goods subject to review	Registration of interest
Stemcor Distribution Limited	Stemcor	Importer of goods subject to review	Registration of interest
			SIFD comments
Hi-tech Steel Services Limited	Hi-tech Steel	Importer of goods subject to review	Registration of interest
Duferco UK Ltd	Duferco	Importer of goods subject to review	Registration of interest
C.J. Upton & Sons Limited	CJ Upton & Sons	Importer of goods subject to review	Registration of interest
Salzgitter Mannesmann UK Ltd	Salzgitter Mannesmann	Importer of goods subject to review	Registration of interest
Top Tubes Limited	Top Tubes	Importer of goods subject to review	Registration of interest
The Ministry of Trade of Republic of Turkey	Government of RT	Foreign Government	Registration of interest
Government of the Republic of Korea	Government of RoK	Foreign Government	Registration of interest
			SIFD comments
Government of Malaysia	Government of Malaysia	Foreign Government	Registration of interest
Ministry of Commerce, India	Government of India	Foreign Government	Registration of interest
			SIFD comments
Trade Remedies Authority of Viet Nam	TRAV	Foreign Government	Registration of interest
EEF UK (UK Steel)	UK Steel	Trade association	Registration of interest
The Construction Equipment Association	The CEA	Trade association	Registration of interest
Korea Iron and Steel Association	KOSA	Trade association	Registration of interest
			SIFD comments

17. The submissions made to this TRQ review are available on the [public file](#).

## Section C: Review Process

### C1. Overview

18. To identify whether there had been a change of circumstances since the application of the tariff rate quota 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 that we have trade data for.
19. 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. Where relevant we have also conducted analysis on a quarterly basis during the POI, including when we account for the variation of the measure in July 2025.

### C2. Scope

#### C2.1 Countries

20. This review considers imports from all countries subject to the safeguard measure as well as those from developing countries who currently are excepted from the safeguard measure.
21. Developing country members of the WTO are listed in **Annex 2**.

#### C2.2 Goods Subject to Review

22. 'Goods subject to review' is defined in regulation 2 of the Safeguard Regulations as 'the goods described in the notice of initiation of a review'.
23. The goods subject to review in this TRQ review are:
- Category 4 – Metallic coated sheet
  - Category 7 – Non-alloy and other alloy quarto plates.
24. The applicants have requested that a TRQ review consider whether specific commodity codes, currently included in the scope of the category 4 and 7 TRQs respectively, should be removed from the scope of the measures. These specific commodity codes are stated in the applications of ISTA and Babcock.

25. The commodity codes requested for review by the applicants are listed in **Annex 3**.

## **C3. Summary of facts considered**

### **C3.1 HMRC data**

26. To analyse trade flows in this TRQ review prior to initiation, we have used 8-digit trade data sourced from His Majesty's Revenue and Customs (HMRC).
27. The dataset used in this review is country of origin data for all imports. Country of origin data provides a more accurate picture of where imports are coming from than country of dispatch data. HMRC-published country of origin 8-digit bulk datasets can be accessed [here](#).

### **C3.2 Comments**

28. Following initiation of this review, parties were provided with an opportunity to provide comments on the review. A further opportunity was provided following publication of the SIFD.
29. The non-confidential versions of all the registration forms and submissions to this review can be found on the [public file](#).
30. Following the publication of the SIFD, the TRA received comments from the following interested parties:
- ISTA<sup>1</sup>
  - Spartan<sup>2</sup>
  - TSUK<sup>3</sup>
  - Stemcor<sup>4</sup>
  - POSCO STEELCON<sup>5</sup>
  - Hoa Sen<sup>6</sup>

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<sup>1</sup> [SIFD comments from ISTA for category 4](#), and [SIFD comments from ISTA for category 7](#), accessed 04/03/2026

<sup>2</sup> [SIFD comments from Spartan](#), accessed 04/03/2026

<sup>3</sup> [SIFD comments from TSUK](#), accessed 04/03/2026

<sup>4</sup> [SIFD comments from Stemcor](#), accessed 04/03/2026

<sup>5</sup> [SIFD comments from POSCO STEELCON](#), accessed 04/03/2026

<sup>6</sup> [SIFD comments from Hoa Sen](#), accessed 04/03/2026

- KOSA<sup>7</sup>
- Government of RoK<sup>8</sup>
- Government of India<sup>9</sup>

31. These comments are summarised in this section and the relevant sections of this final recommendation have been amended to reflect these comments.

### **C3.2.3 ISTA**

32. ISTA submitted two comment documents concerning the SIFD; the first document concerning quarto plate products (category 7) on 19 February 2026 and the second document concerning Aluzinc and aluminised steel (category 4) on 23 February 2026.
33. ISTA has stated in the submission concerning quarto plate that *“We are astonished by your conclusions and as you would expect, do not agree with them and urge you in the strongest terms to reverse your SIFD and uphold our request for discontinuation of HS Codes 7208519100, 7208529100, 7208519800, 7208512000, 7208529900 and 7208512010 from safeguarding regulations”*.
34. ISTA has stated in the submission concerning Aluzinc and aluminised steel that *“We are disappointed by your conclusions and as you would expect, do not agree with them and urge you in the strongest terms to reverse your SIFD and uphold our request for discontinuation of HS Codes 7210610020 and 7210690080 from safeguarding regulations.”*
35. The TRA notes that it may only recommend revocation of a tariff rate quota where there is sufficient evidence that UK producers have ceased production of like or directly competitive goods, in accordance with regulation 35B(7)(c) of the Safeguard Regulations. As the TRA has not identified evidence that production of like or directly competitive goods has ceased, we have not recommended the revocation of these commodity codes.
36. ISTA have asked the TRA in both submissions to *“confirm that you have been provided with such product-specific data by each of the producers in question and have been able to audit same to your satisfaction”*. It has made several comments questioning whether

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<sup>7</sup> [SIFD comments from KOSA](#), accessed 04/03/2026

<sup>8</sup> [SIFD comments from Government of RoK](#), accessed 04/03/2026

<sup>9</sup> [SIFD comments from Government of India](#), accessed 04/03/2026

supporting evidence has been provided that the relevant commodity codes that meet certain product criteria (such as thickness or width) have been produced in the UK during or after the POI.

37. The TRA confirms that it requested supporting evidence from all UK producers of categories 4 and 7 goods. The supporting evidence that was submitted by these UK producers to the case team provides the TRA with sufficient assurance that certain goods were produced during or after the POI.
38. ISTA have commented in both submissions that certain products within the commodity codes requested for review should be excluded from the safeguard measure. It stated that, for category 7, *“any widths in excess of 2100mm should be removed from safeguarding”* on the basis that *“imports cannot be said to compete with domestic production”*. For category 4, ISTA stated that *“clear technical, commercial and supply distinctions [for Aluzinc and aluminised steel] justify separate treatment with Category 4”*. It has further stated that there are several technical and commercial differences between UK-produced and imported goods to support these statements.
39. The TRA maintains its decision that these products within commodity codes should not be excluded from the measure. As noted in paragraphs 53, 62, and 75 of the SIFD, the TRA confirmed UK production of goods like and/or directly competitive with all goods subject to review captured by the commodity codes requested for review by the applicants in categories 4 and 7 steel products. Paragraphs 55 to 61 of the SIFD also detail how the TRA considered physical and commercial differences between category 4 products, determining that differences between these goods do not prevent direct competition. Finally, paragraph 75 confirms that the TRA has evidence that category 7 products in excess of 2100mm width were produced in the UK after the POI.
40. The TRA also notes that it can only recommend a variation of the tariff rate quota in accordance with paragraph 21(9) of Schedule 5 of the Act. Paragraph 21(9) does not include provision to allow the exclusion of goods, contained within the commodity codes captured by categories 4 or 7, from the scope of the relevant TRQs.

### **C3.2.1 TSUK**

41. TSUK submitted comments concerning the SIFD on 18 February 2026. It has stated that *“TSUK supports the TRA’s intended decision not to introduce product exclusions from the safeguard tariff-rate quotas applicable to Categories 4 and 7”* and that it *“respectfully*

*requests that the TRA confirm its intended decision and maintain the safeguard measures for Categories 4 and 7 without exclusions.”*

42. The TSUK submission reiterates its arguments made in its registration submission and has not made any further requests of the TRA.

### **C3.2.2 Spartan**

43. Spartan submitted comments concerning the SIFD on 23 February 2026. It has stated that *“the Company [Spartan] supports TRA’s intended final recommendation to maintain the tariff rate quota for Category 7 products”*.
44. Spartan has commented on the statements made by other interested parties at registration. It has stated that *“the TRA should also consider the scenario where larger plates, which are hypothetically exempt from duty, are used for profiling shapes instead of 2m plates”*; that *“the fee for cutting is not usually as high as the ISTA submitted”* (it supported this statement with a purchase order invoice); and that it *“produces the Category 7 products to Class S flatness across all widths”* (it has provided several sales invoices to support this statement).
45. The TRA has noted these comments and has reflected this in its analysis throughout this final determination and recommendation. We consider the statement concerning profiling shapes from larger plates to further indicate that there is limited competition between plates wider than 2050mm and narrower than 2050mm; the evidence of a cheaper cutting fee to further indicate that the cost of profiling plate may be smaller and therefore less likely to prevent direct competition; and evidence of class S flatness production reverses the determination in the SIFD that class S flatness plate products were not produced in the UK during the POI.
46. Spartan has also requested for the TRA to *“extend the scope of the TRQ Review to also look into the import volume from Indonesia, to add Indonesia to the list of developing countries non-exceptions, and extend the cap on the amount of imports coming from one country within the residual quota [...] to Indonesia”*.
47. The TRA considers the request to assess these matters to fall outside the scope of this review, as defined in the NOI, and will therefore not consider it further as part of conducting this review.

### C3.2.4 Stemcor

48. Stemcor submitted comments concerning the SIFD on 23 February 2026. It has provided comments concerning both categories 4 and 7.
49. Concerning category 4 it has stated that “*Stemcor profoundly disagrees with the TRA’s conclusion. It reflects a fundamental misunderstanding of the distinctions between products, tariff codes and safeguard categories. Multiple metallurgically and commercially distinct products can fall within the same safeguard category despite having very different performance characteristics and end-use applications*”. It has also stated that the commodity codes in category 4 requested for review are a small proportion of total category 4 imports, and that a proportionate solution would be to establish a dedicated safeguard quota for these codes based on historic UK import volumes.
50. The TRA maintains its finding that the category 4 commodity codes requested for review captures goods that are like or directly competitive with UK-produced goods. We note that there are physical and commercial differences between goods within this category which result in difference performance characteristics but do not consider the evidence provided by Stemcor or other interested parties to be sufficient to demonstrate that these differences would prevent all direct competition between these goods if the commodity codes were removed from the category 4 products TRQ.
51. The TRA notes that the establishment of a distinct safeguard quota for these goods was not requested by the applicants and so it is not within the scope of consideration of this review, as described in the NOI. This request will therefore not be considered further.
52. Concerning category 7, Stemcor has commented on the production capability of each of the three registered producers of category 7 products, stating that “*Spartan does not produce plate below 12mm thickness, nor over 2050mm in width*”; that “*Liberty Steel Dalzell has not produced plate since 2024 and prior to that production was intermittent*”; and that “*Tata Steel UK produces sheet, not plate*”. It states that that “*safeguard measures should be based on actual, current production, not theoretical capability, historic operation, or uncertain future intent*”.
53. The TRA reiterates that its determinations within this review are based on evidence received of production during and after the POI. The UK producers Spartan, TSUK, and Liberty Dalzell have each provided evidence of actual production during and after the

POI of products captured by commodity codes in category 7. These submissions also show evidence of Spartan producing plate below 12mm thickness and above 2050mm width. TSUK has provided invoice and production audit evidence that all commodity codes in category 7 that it states it produced were made in the UK during the POI. We also note that certain sheet products are captured within the commodity codes of category 7, therefore Stemcor's comment that TSUK produces sheet product does not contradict the fact that TSUK is a producer of category 7 products.

### **C3.2.5 POSCO STEELCON**

54. POSCO STEELCON submitted comments concerning the SIFD on 23 February 2026. It has stated that the *“TRA’s assessment of physical and commercial similarity does not fully reflect the functional differences and the distinct market segmentation”*. It requests *“the TRA to: Remove commodity code 7210 6900 80 from safeguard measures. Reassess TRQ application for product codes with no domestic production. Consider functional performance, application-specific requirements, and market segmentation in direct competitiveness assessments”*.
55. The TRA maintains its position in relation to its assessment that the directly competitive goods to those imported and captured by commodity code 7210 6900 80 did consider functional performance, application-specific requirements, and market segmentation. We identified use-cases and certain industrial applications that required products with specific technical requirements, including its heat-resistant properties. We also identified several common use-cases for imported goods captured by 7210 6900 80 and UK-produced like and directly competitive goods in category 4, such as goods destined for construction projects which require high corrosion resistance. We also considered the effect of price differences on market segmentation and determined that there is insufficient evidence that a price difference would be maintained between 7210 6900 80 and 7210 6100 20 goods and other category 4 goods if these goods were removed from the TRQ.
56. We therefore have maintained our conclusion that there is UK production of like and/or directly competitive goods, so commodity code 7210 6900 80 should not be removed from the scope of the measure.

### C3.2.6 Hoa Sen

57. Hoa Sen submitted comments concerning the SIFD on 23 February 2026. It has stated that *“the TRA should exclude imports of Galvalume steel products classified under commodity code 7210 6100 20 from the scope of safeguard measures in the UK or, alternatively, increase the quota volumes for product category 4 to meet internal UK demand”*.
58. Hoa Sen have alleged that there is a lack of evidence of UK production of category 4 goods. It states that *“TSUK has merely asserted that it produced goods falling under commodity code 7210 6100 20 during the POI by reference to such single invoice”*, that *“TSUK itself admits that the products contained in that invoice are not Aluzinc; beyond such invoice, neither TSUK nor any other UK domestic producer has provided evidence of commercially relevant domestic production of goods classified under commodity code 7210 6100 20”*, and that *“registrations of interest importers, exporters, overseas producers/exporters, and foreign governments consistently indicate that there is no domestic production in the UK of goods classified under commodity code 7210 6100 20, which suggests that the evidence of domestic production that TSUK claims (if any) is in fact commercially irrelevant”*.
59. The TRA maintains its position as it notes that TSUK was not required to provide any predetermined number of invoices as evidence, and the fact that the invoice evidence provided is sufficient to confirm production of goods falling under commodity codes 7210 6100 20 did not cease during the POI. We also note that several products other than Aluzinc are included within commodity code 7210 6100 20, so TSUK’s statement that it does not produce Aluzinc is not contradictory to it producing goods like other goods imported and classified within commodity code 7210 6100 20. While submissions from other interested parties stating that they are not aware of UK production of a commodity code indicates there may be no production, the TRA does not consider these statements, nor the evidence underpinning these statements, to be sufficient evidence to contradict the evidence submitted to the TRA that indicate production of these goods by UK producers.
60. Hoa Sen have alleged that the assessment on quota utilisation is incomplete, stating *“the TRA’s assessment did not consider that importer preferences extend beyond purely price considerations”* and that changes to import flows are *“attributable to several factors,*

*including the fact that these products constitute a specialised category of coated steel, with distinct technical characteristics and end uses that cannot be readily substituted with other coated flat products manufactured domestically*". It has also stated "*where a change in circumstances has been acknowledged, the adequacy of the existing quota must necessarily be reassessed*".

61. The TRA maintains its position that its assessment of quota utilisation is complete in this review. We note that we have considered the technical characteristics and whether domestically produced goods can be readily substituted for imports of goods subject to review, as part of the assessment of continued UK production of like and/or directly competitive goods. The TRA also notes that a change in circumstances does not necessarily equate to the need for a reassessment of the TRQ, as it is possible that a TRQ continues to be effective without variation, irrespective of a change in circumstances, as is the case in this situation.

### **C3.2.7 KOSA**

62. KOSA submitted comments concerning the SIFD on 23 February 2026. It has stated that "*to address potential supply disruption, a dedicated sub-quota within Category 4 for Aluzinc (HS 7210.61) could be established to preserve overall market stability while safeguarding essential niche demand. Alternatively, a time-limited exclusion [...] would represent a balanced and pragmatic solution, minimising any immediate injury risk while ensuring downstream supply stability.*" It also states that following the scope revision note to the AD0071 public file "*a more detailed assessment distinguishing specific sizes [of category 7 products] that are not produced under the relevant commodity codes would represent a more reasonable and proportionate approach to addressing the needs of downstream users*".
63. The TRA considers the request to consider creating a sub-quota within category 4 or a time limited exclusion to fall outside the scope of consideration of this review, as defined in the NOI, and will therefore not consider it further as part of this review.
64. Concerning the KOSA comments regarding category 7, the TRA maintains that its like and directly competitive goods assessment of category 7 products, which is stated in detail in section E2.2, is sufficient to meet the requirements of this review. We also note that the TRA must operate cases independently of one another, so the findings of other investigations including AD0071 cannot underpin the decisions of this review.

### C3.2.8 Government of RoK

65. The Government of RoK submitted comments concerning the SIFD on 23 February 2026. It has stated that *“the Korean Government submits that the TRQs applicable to Categories 4 and 7 should be terminated. Alternatively, should the TRA determine that continuation of the measures is warranted, the Korean Government respectfully requests that the TRA: (i) fundamentally restructure the quota allocation, including by raising Korea’s country cap to at least 40% of the residual quota for Category 4 and 50% for Category 7; (ii) establish a dedicated sub-quota for Aluzinc (HS 7210.61) within Category 4 or grant a time-limited exclusion; (iii) provide exemptions for technically non-substitutable products, including ultra-wide plates exceeding 2,500mm and S-grade flatness plates; and (iv) restore and expand carry-over allowances for unused quota balances. These modifications are necessary to align the measures with the TRA’s own findings, prevailing market conditions, and the United Kingdom’s broader public interest”*.
66. The Government of RoK has argued that regulation “35B(7) [of the Safeguard Regulations] *calls for the TRA, once a change in circumstances has been identified, to determine whether the TRQ should be “maintained or varied” on the basis of a genuine and evidence-based assessment of the necessity, proportionality, and structure of the TRQs in the current market conditions. It is insufficient merely to acknowledge that circumstances have changed while maintaining the existing framework without meaningful modification*”.
67. The TRA maintains that the finding that there has been a change in circumstance does not necessarily imply a need for the variation of the TRQ, and that it has the discretion to assess other factors it considers relevant when determining whether to maintain or vary a TRQ.
68. The Government of RoK has referenced articles 5.1, 5.2(a), and 7.4 of the WTO Agreement on Safeguards (SG Agreement). It has alleged that low quota utilisation of categories 4 and 7 indicate that *“maintaining the measures in their current form, without variation, raises serious questions as to whether the level of protection exceeds what is “necessary” within the meaning of [article 5.1 of the SG Agreement]”,* that the increase in Korean total import share of both product categories while being subject to the country caps is inconsistent with Article 5.2(a) of the SG Agreement as it is allegedly now a WTO member *“having a substantial interest in supplying the product concerned”*, and alleges

that the introduction of country specific caps in July 2025 was inconsistent with article 7.3 of the SG Agreement as it “*represents a movement in the opposite direction from progressive liberalisation*”. It requests that the TRA “*reassess not only the allocation methodology but also whether the continued application of the TRQs can be justified at all*”.

69. The TRA maintains its position that maintaining the measure is in accordance with our domestic and international obligations. We also note that this review has not considered whether the Republic of Korea should have a country specific quota, or the need for the variation of any relevant country caps. These are matters that fall outside the scope of consideration of this review, as defined in the NOI, and will therefore not be considered further as part of this review.
70. The Government of RoK has stated that changes in import flows represent fundamental changes in global supply chains and that alternate sources of supply other than the Republic of Korea are not available; that low quota utilisation is a function of misallocation; and that import data shows “*that Korea has become a principal and stable supplier in both categories*”, reflecting “*a structural reallocation of trade rather than a temporary surge*”.
71. The TRA considers that the import flow data is not sufficient to demonstrate that there are no other alternative sources of supply for category 4 and 7 goods other than the Republic of Korea. The TRA maintains its position that downstream users of the goods subject to review had access to unutilised quotas from all countries, except for the Republic of Korea and the Socialist Republic of Vietnam, in categories 4 and 7 during the POI. This indicates that downstream users may have access to sources of category 4 and 7 product that would not incur out of quota safeguard duties.
72. The Government of RoK has commented that it considers the like and directly competitive goods assessments of category 4 and 7 products have “*analytical shortcomings*“. It has disputed the analysis of product categories rather than the commodity codes requested for review by the applicant, the use of shared standards as evidence of physical likeness, allegedly insufficient consideration of price differentiation, and the effect of technical requirements such as S-grade flatness on the TRQs. It also noted actions taken in AD0071, in relation to category 7 products.

73. The TRA maintains its position that UK producers have continued to produce like and directly competitive goods, as set out in the published SIFD for this review. We also note that, in conducting these assessments, the TRA has taken account of all relevant factors and considerations necessary to confirm that that the UK continues to produce goods that are like and/or directly competitive with those imported into the UK and subject to the TRQs applicable to category 4 and 7 products.
74. The Government of RoK has commented on the requirement of S-grade flatness on downstream industry and similar public interest considerations such as supporting downstream strategic industries like defence, energy, and construction.
75. The TRA notes that since the publication of the SIFD, Spartan has provided the TRA invoice evidence that it was a producer of S-grade flat steel during the POI. We maintain that evidence of class S flatness production during the POI should reverse the determination in the SIFD that class S flatness plate products were not produced in the UK during the POI.
76. The Government of RoK has commented that the TRQs, if maintained, should be restructured. It states that “*country caps applied to the residual quotas require fundamental restructuring, both to avoid asymmetrically restrictive outcomes for principal suppliers and to ensure alignment with actual market demand*”, that it “*supports the establishment of a dedicated sub-quota within Category 4 for Aluzinc*” or “*a time-limited exclusion [of Aluzinc]—for example, for 12 to 24 months followed by a reassessment of market impact*”, and that the TRA should “*restore and, where appropriate, expand carry-over allowances*”.
77. The TRA considers these requests to fall outside the scope of consideration of this review, as defined in the NOI, and will therefore not consider them further as part of this review.
78. The Government of RoK has commented on the consistency of safeguards with the UK-Korea Free Trade Agreement, stating that “*the continued application of restrictive country caps on Korea’s steel exports to the UK sends a signal that is inconsistent with the deepening of bilateral economic integration*”.
79. The TRA has informed relevant stakeholders within His Majesty’s Government to ensure that relevant government counterparts are aware of the position of the Korean

Government concerning safeguards and the bilateral trade relationship between the United Kingdom and the Republic of Korea.

### **C3.2.9 Government of India**

80. The Government of India submitted comments concerning the SIFD on 23 February 2026. It has stated that *“the continuation of TRQs for Categories 4 and 7, in the circumstances provided in the SIFD, does not appear necessary due to the low volume of imports and heavy underutilization of the import quota. Accordingly, the GOI requests that the present TRQ measure must be terminated for categories 4 and 7 with immediate effect”*.
81. The Government of India states that *“The TRA does not assess serious injury to the domestic UK producers of Categories 4 and 7 based on the current facts and circumstances”* and that *“any determination on continuation of the TRQ measures, without the assessment of present state of injury to the domestic industry, would be contrary to the obligations under the SG Agreement”*. It has also stated the TRA’s use of the term “has concluded” in the SIFD indicates the opportunity to comment is *“a procedural formality rather than a genuine opportunity for the parties to make comments which may aid the TRA in the decision-making process”*.
82. The TRA notes that regulation 35B(6)(a) of the Safeguard Regulations states that *“In conducting a TRQ review, the TRA need not make any assessments or determinations under Parts 2 to 4”*, of which Part 3 considers *“Serious injury and causation”* and Part 4 *“Determination of an adequate amount to prevent or remove serious injury and remedies”*. Further, we note that the TRA conducted a serious injury assessment in the most recent extension review of the UK safeguard measures on certain steel products (case SE0041)<sup>10</sup>, and determined that serious injury would recur if the safeguard measure were revoked. We also note for clarity that, alongside the use of the word “intended” throughout the SIFD, use of the words “has concluded” within the SIFD indicated the TRA’s position in light of available information and data to that point and was not meant to indicate that those conclusions were final. The TRA has considered, in making this final determination and recommendation, all comments submitted to it in response to its publication of the SIFD for this case.

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<sup>10</sup> [SE0041 - Extension review of safeguard measures on certain steel products](#), Public File, Accessed 05/03/2026

83. The Government of India has stated in respect to category 4 products that *“the TRA underlying [conclusion that like or directly competitive goods are produced in the UK] does not sufficiently address and evaluates all the necessary the factors that are provided under WTO law”*. It also stated that *“unused quota for India and other countries, it is evident that imports are not causing any injury to the domestic producers”* and that *“where overall quota utilisation remains low and domestic producers are not facing demonstrable displacement by imports, the continuation of the TRQ for Category 4 products, particularly those products which are not manufactured in the UK, must be discontinued”*. The Government of India has commented in respect to category 7 products that low quota utilisation, and the SIFD findings that certain technical requirements like S-grade flatness not being produced in the UK means that *“the continuation of the TRQ does not appear to be justified”*.
84. The TRA maintains its position that UK producers have continued to produce like and directly competitive goods, as set out in the published SIFD for this review. In accordance with regulation 35B(7)(c) of the Safeguard Regulations, the TRA may only recommend the revocation of a TRQ where there is sufficient evidence that production of those goods has ceased. We therefore have not changed our determination to maintain the measure as a result of this comment.
85. The TRA reiterates that it may not recommend revocation of the quota unless it has sufficient evidence that UK production of certain goods has ceased. As we identified production of like and directly competitive goods of all commodity codes requested for review, the TRA maintains that it should not recommend revocation of the measure regarding category 7 steel products.

### **C3.3 Other**

86. Other sources of information which the TRA has used in this review are referred to in the appropriate sections.

## Section D: Change in circumstances

### D1. Background

87. In conducting a TRQ review, the TRA must determine whether there has been a change in circumstances since the application of the relevant tariff rate quota (see regulation 35B(6)(b) of the Safeguards Regulations). Regulation 35B(9) of the Safeguards Regulations states that a change of circumstances may, among other things, be:
- the fact that the tariff rate quota, or any part of the quota, has been exhausted;
  - the impact of the tariff rate quota on traditional trade flows.
88. A summary of the change in circumstances that was found in this review is set out in the following section. Change due to partial quota exhaustion has been addressed in Section D2.1 and change due to the impact of the TRQ on traditional trade flows has been addressed in Section D2.2.

### D2. Assessment of change in circumstances

#### D2.1 Change due to partial quota exhaustion

89. ISTA and Babcock have both referenced that after 1 July 2025 the TRQ for product categories 4 and 7 were varied to be subject to country caps of 15% and 20% of the residual quota respectively, as per Trade Remedies Notice 2025/12<sup>11</sup> following the review TQ0066.<sup>12</sup>
90. The [UK Integrated Online Tariff tool](#) provides daily updated balances of tariff quotas. The TRA has used this tool to evaluate the quota utilisation rates during the POI for all categories currently subject to the safeguard measure.
91. The TRA has noted that the 15% country cap for category 4 goods was reached by Vietnam during the final quarter of the POI (July-September 2025). We also found that the 20% country cap for category 7 goods was reached by the Republic of Korea during the same quarter.

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<sup>11</sup> [Trade remedies notice 2025/12: safeguard measure: tariff-rate quota on steel goods](#), accessed 10/02/2026

<sup>12</sup> [TQ0066 - TRQ - Developing Country Exception Review, public file](#), accessed 10/02/2026

92. The TRA notes that the country caps were implemented to administer access to the TRQs, and a country reaching a country cap does not indicate exhaustion of the totality of the residual quota.
93. The TRA has concluded that part of the quota allocations for categories 4 and 7 were exhausted during the POI. Whilst individual country quotas and the residual quota for categories 4 and 7 were not exhausted during the POI, our analysis shows that individual country caps for Vietnam and the Republic of Korea were routinely reached after the introduction of these caps on 1 July 2025.
94. This conclusion that part of the quota has been exhausted during the POI satisfies the criteria for a change in circumstance in categories 4 and 7 as defined in regulation 35B(9)(a) of the Safeguard Regulations.

## **D2.2 Change due to the impact of the TRQ on traditional trade flows**

95. ISTA have stated the revised safeguards significantly restrict imports of category 4 from major supplier countries, including the Republic of Korea and Vietnam. It argues that these restrictions will materially alter market access conditions for domestic importers and downstream users<sup>13</sup>.
96. To test this statement the case team has gathered data from HMRC and Global Trade Tracker (GTT) to test whether there has been an impact on traditional trade flows by the TRQs on categories 4 or 7. The case team looked at trade flows of categories 4 and 7 products from the 12 months prior to when the safeguard measure was implemented (1 July 2017 to 30 June 2018) and the POI.

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<sup>13</sup> [ISTA Application](#), ISTA discontinue safeguarding on Aluzinc and Zinc Magnesium V7, page 4, section 6, accessed 09/02/2026

**Table 2: Category 4 products import volume prior to the TRQ and during the POI**

Country of origin (by volume in 2017/18)	June 2017 – July 2018 (import volume, metric tonnes)	POI [October 2024 – September 2025] (import volume, metric tonnes)	Difference (metric tonnes)	Percent change
Belgium	241,344.609	105,358.048	-135,986.561	-56.35%
France	229,111.251	164,543.447	-64,567.804	-28.18%
Germany	177,172.273	105,358.048	-71,814.225	-40.53%
Netherlands	158,548.776	94,151.324	-64,397.452	-40.62%
Taiwan	124,954.518	70,561.304	-54,393.214	-43.53%
Italy	91,882.756	1,809.025	-90,073.731	-98.03%
Vietnam	81,208.560	117,846.727	36,638.167	45.12%
Republic of Korea	49,973.445	148,449.241	98,475.796	197.06%
All other countries	289,224.879	115,682.400	-173,542.479	-60.00%
<b>Total</b>	<b>1,351,538.311</b>	<b>925,293.028</b>	<b>-426,245.283</b>	<b>-31.54%</b>

Source: HMRC UK Trade Info

97. This data shows that the trade flows of product category 4 have changed since 2017/18. Total import volume has increased significantly from Vietnam and the Republic of Korea, while imports from nearly all other sources have decreased significantly.

**Table 3: Category 7 products import volume prior to the TRQ and during the POI**

Country of origin (by volume in 2017/18)	June 2017 – July 2018 (import volume, metric tonnes)	POI [October 2024 – September 2025] (import volume, metric tonnes)	Difference (metric tonnes)	Percent change
Netherlands	47,158.945	128,554.456	81,395.511	172.60%
Ukraine	32,721.740	0.000	-32,721.740	-100.00%
Sweden	32,123.606	32,792.124	668.518	2.08%
Germany	31,779.998	22,507.774	-9,272.224	-29.18%
Spain	29,006.396	11,234.816	-17,771.580	-61.27%
Denmark	25,186.736	18,144.490	-7,042.246	-27.96%
Finland	25,185.646	20,021.200	-5,164.446	-20.51%
Republic of Korea	14,377.567	58,499.495	44,121.928	306.88%
All other countries	75,162.403	55,074.103	-20,088.300	-26.73%
<b>Total</b>	<b>312,703.037</b>	<b>346,828.458</b>	<b>34,125.421</b>	<b>10.91%</b>

Source: HMRC UK Trade Info

98. This data shows that the trade flows of product category 7 have changed since 2017/18. Total import volume has massively increased from the Netherlands and the Republic of Korea, while imports from nearly all other sources have decreased significantly.
99. This impact on traditional trade flows satisfies the criteria for a change in circumstance in Categories 4 and 7 as defined in regulation 35B(9)(e) of the Safeguard Regulations.

## Section E: Consideration of if the category 4 and 7 TRQs should be maintained or varied

### E1. Background

100. When this case initiated, parties were asked to comment on the request by the applicants to vary the safeguard measure by removing certain products from product categories 4 and 7. Parties were also invited to answer questions concerning the domestic production of categories 4 and 7 goods, import of the goods subject to review, whether directly competitive goods are produced in the UK, and the likelihood of serious injury if the safeguard measure was varied.

101. In its application, ISTA requests:

- Concerning category 4 products, *“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)”*
- Concerning category 7 products, it states that *“quarto Plate below 15mm [thickness] and wider than 2050mm in width is not produced in the UK”* and that it requests *“a review of TRQs under safeguarding measures applicable to imports of non-alloy and other alloy quarto plates covered by product category 7 imported under commodity codes:”*
  - *7208 5191*
  - *7208 5291*
  - *7208 5198*
  - *7208 5120*
  - *7208 5299*

102. In its application, Babcock requests:

- *“Exemption of commodity code 7208512010 from safeguard”* and that *“Babcock wishes government departments to note.”*

- *“The considerable variety and complexity of steel required to support shipbuilding.”*
- *“The importance of Shipbuilding to the Company as well as the regional economy.”*
- *“That building a shipbuilding export business is dependent on optimising costs.”*
- For *“government departments to agree that: Babcock should be exempted or refunded steel tariff costs (from South Korea or any other worldwide source)”*.

103. Several registered interested parties have provided submissions that oppose the applicants’ requests to vary the safeguard measure. The interested parties TSUK, Spartan, and Liberty Dalzell each state that they produce category 4 and/or category 7 products captured by the commodity codes listed above. These parties have stated that it is likely that UK producers of the like goods would likely suffer serious injury if the safeguard measure was varied as requested in the applications.

104. TSUK has also argued that parts of the TRQs for categories 4 and 7 have low utilisation and state that *“ISTA’s concerns do not relate to quota availability as such, but rather to a preference for specific low-priced origins (such as Korea and Vietnam)”*.<sup>14</sup>

105. The TRA has therefore considered the following to determine whether it should recommend maintaining, varying or, if there is sufficient evidence that UK producers have ceased all production of categories 4 and 7 goods, revoking the category 4 or 7 tariff rate quotas:

- Whether like or directly competitive goods captured by the following commodity codes are produced in the UK:

**Category 4**

- 7210 6100 20
- 7210 6900 80

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<sup>14</sup> [TATA STEEL UK LIMITED, registration of interest](#), accessed 10/02/2026

### **Category 7**

- 7208 5191 00
  - 7208 5291 00
  - 7208 5198 00
  - 7208 5120 00
  - 7208 5299 00
  - 7208 5120 10
- Whether category 7 products “*below 15mm [thickness] and wider than 2050mm in width*” have been produced in the UK.
  - Whether an exemption could be provided for Babcock that would not risk serious injury to UK producers of category 7 products.
  - Whether historic tariff rate quota usage indicates that UK importers are unduly restricted from importing goods subject to review in sufficient quantity to meet the needs of the UK market.

## **E2. Consideration of parties’ comments**

### **E2.1 Removal of commodity codes from category 4**

106. The TRA has conducted a like and directly competitive goods assessment of the category 4 goods subject to review subject to the following commodity codes:
- 7210 6100 20
  - 7210 6900 80
107. This assessment identified that TSUK is the only registered interested party that produced category 4 products during the POI.
108. TSUK has stated in its registration document that it produced goods captured by the commodity code 7210 6100 20, although this product was not Aluzinc. TSUK has supported this statement by providing an invoice confirming goods like those classified under this commodity code were sold during the POI, with an export declaration stating that the products covered by the invoice are of UK preferential origin.

109. TSUK has stated that it does not produce 7210 6900 80. It also states that “*with respect to commodity code 7210690080, TSUK submits that it manufactures directly competitive products.*”
110. The TRA has determined that the evidence provided by TSUK is sufficient to conclude that goods captured by commodity code 7210 6100 20 are produced in the UK.
111. The TRA also considered the extent to which the products that TSUK produces within category 4, including 7210 6100 20, are directly competitive with Aluzinc and goods subject to review captured by the commodity code 7210 6900 80. We have considered the physical and commercial likeness of these goods, as well as the effect of price and warranties on direct competitiveness.
112. Concerning physical likeness, the TRA has found that there are significant similarities in raw materials and processing, with the primary difference being the ratio of raw material inputs. We have also identified that all products from these commodity codes share common British Standards, which conform to the European standardisation system,<sup>15</sup> indicating that there are significant physical similarities between the goods.
113. ISTA has stated in its application that there are certain roof and cladding warranties that require Aluzinc’s unique properties to be valid. It states that as Aluzinc is not produced in the UK there are no directly competitive goods suitable for this end use produced in the UK.
114. The TRA have investigated these roof and cladding warranties and found that the warranties are conditional on product properties that are shared with the goods produced by TSUK, such as the chemical composition of the product’s metallic coating and a requirement to meet certain European standards. We have therefore concluded that this evidence does not present a clear end use differential where a directly competitive good produced in the UK would not also be suitable.
115. Concerning commercial likeness, we have considered the different commercial uses of products within these commodity codes. We identified evidence of use cases where different products within these commodity codes were uniquely suitable, such as certain products that maintained stability under high temperatures, other products with high corrosion resistance, and others with superior forming properties. Nonetheless, the

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<sup>15</sup> [BS EN 10346 Continuously hot-dip coated steel flat products for cold forming - Technical delivery conditions](#), accessed 04/03/2026

products operate effectively in similar use cases such as those in construction and automotive industries. We consider it likely that goods could be substituted if commercial conditions permitted it.

116. The TRA has considered the effect of price on the direct competitiveness of category 4 goods produced in the UK and imports of goods subject to review captured by the commodity codes 7210 6100 20 and 7210 6900 80.
117. ISTA have stated that Aluzinc has a £30-40 per tonne premium and aluminised steel has a £110-130 per tonne premium over “*commercial grade category 4 material.*”
118. Conversely, TSUK have stated “*while ISTA argues that such substitution is currently limited due to the price premium of Aluzinc/aluminized steels, the very purpose of its request is to enable higher-volume imports at lower prices. It is therefore plausible that this premium would diminish (or disappear) under conditions of unconstrained supply.*”
119. We have considered the evidence provided by both parties and have concluded that a significant price difference does currently exist between the goods produced in the UK within category 4 including 7210 6100 20 and those imported under the codes 7210 6100 20 and 7210 6900 80. However, both TSUK and ISTA have confirmed that the relevant goods are similar enough to have competing end uses in the right market conditions, and the TRA considers it likely that the price difference between Aluzinc or aluminumized steel and other category 4 material would reduce if these products were no longer subject to the safeguard measure. The TRA has therefore concluded that the goods produced in the UK are directly competitive goods.
120. The TRA has also considered the quota utilisation of the category 4 TRQ during the POI, to assess whether importers have sufficient access to category 4 products to meet the demands of the UK market.

**Table 4: Quota Utilisation rates of category 4 during POI**

	Q2 (Oct 2024 – Dec 2024)			Q3 (Jan 2025 – Mar 2025)			Q4 (April 2025 – June 2025)			Q1 (July 2025 – Sep 2025)		
Country	Quota Available (MT)	Quota used (MT)	Utilisation	Quota Available (MT)	Quota Used (MT)	Utilisation	Quota Available (MT)	Quota Used (MT)	Utilisation	Quota Available (MT)	Quota Used (MT)	Utilisation
EU	520,473	118,504	23%	718,759	131,074	18%	907,994	116,078	13%	333,545	118,360	35%
Taiwan	63,682	22,554	35%	73,880	14,668	20%	92,328	16,520	18%	34,484	17,920	52%
India	24,727	22,686	92%	26,231	18,502	71%	32,118	3,085	10%	25,468	395	2%
Türkiye	49,085	32	0%	73,174	11	0%	97,552	132	0%	Individual country quota removed		
Residual	89,681	80,825	90%	92,507	89,384	97%	87,703	87,251	99%	85,595	25,788	30%
Vietnam	Prior to 1 July 2025, these countries did not have country-specific quotas or were not subject to country-specific caps for category 4 goods									12,839	12,839	100%
Republic of Korea										12,839	12,839	100%
Japan										12,839	69	1%
USA										12,839	42	0%
Canada										12,839	0	0%
Switzerland										12,839	0	0%
<b>Total</b>	<b>747,648</b>	<b>244,601</b>	<b>33%</b>	<b>984,550</b>	<b>253,637</b>	<b>26%</b>	<b>1,217,765</b>	<b>233,066</b>	<b>18%</b>	<b>479,092</b>	<b>162,462</b>	<b>34%</b>

121. Table 4 shows the quota utilisation rate in percentage terms for all countries with country specific quota. After the safeguard measure was varied on 1 July 2025 to introduce a 15% country-specific cap to the category 4 TRQ, the table shows the country-specific cap utilisation of countries without country-specific quotas. Türkiye’s individual country quota was also removed for Q1 (July 2025). We calculated these values using the UK Integrated Online Tariff.<sup>16,17</sup> Quota availability is calculated from the available balance at the start of a quarter plus any unused balance carried forward from the previous

<sup>16</sup> [UK Integrated Online Tariff quota tool](#)

<sup>17</sup> In our analysis we identified some inconsistencies in the UKIOT data. We have addressed these with HMRC internal data.

quarter.<sup>18</sup> Quota use is calculated by subtracting the balance remaining at the end of the quarter from the quota available. Finally, we calculate utilisation by presenting the quota used as a share of the quota available.

122. Table 4 shows significant portions of the EU quota remaining unutilised over the POI, although utilisation increased in Q1 when unused balances were no longer carried over. We also note Vietnam and Republic of Korea quotas being reached in Q1, following Trade Remedies Notice 2025/12 which limited countries to 15% of the residual quota in Category 4. Prior to this quarter the residual quota was near fully utilised. Country caps appear to have limited imports under the quota in Q1 and lowered the utilisation rate significantly.

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<sup>18</sup> Unused quota balances were no longer carried forward from June 2025 onwards. This only affects Q1 in the above table.

123. As this shows that only 34% of the total category 4 tariff rate quota was utilised during the POI, the TRA has concluded that the current safeguard measure is sufficiently liberal to allow downstream users of category 4 products to purchase imports from other countries than the Republic of Korea or Vietnam without a significant risk of incurring the out-of-quota safeguarding duty.

## **E2.2 Removal of commodity codes from category 7**

124. The TRA has conducted a like and directly competitive goods assessment of the category 7 goods subject to review subject to the following commodity codes:

- 7208 5191 00
- 7208 5291 00
- 7208 5198 00
- 7208 5120 00
- 7208 5299 00
- 7208 5120 10

125. This assessment identified that TSUK, Spartan, and Liberty Dalzell are registered interested parties that produce these commodity codes.

126. TSUK has stated the following in its registration concerning which category 7 goods it produced:

*“TSUK provides evidence of the manufacture and sale of products classified under commodity codes 7208 5291, 7208 5120, 7208 5299, and 7208 5198 in Annex 2”*

*“With respect to commodity code 7208 5191, while TSUK has not identified direct evidence of current production, it has the technical capability to manufacture this product, as it represents a combination of parameters already produced by TSUK (width under 7208 5291 and thickness under 7208 5198)”*

127. TSUK provided additional evidence from its accounting mainframe which supported these statements.

128. Spartan has stated the following in its registration concerning which category 7 goods it produced:

*“Spartan UK produces category 7 products steel plates with thickness from 12 to 150mm, max width 2100 mm and max length 22 m. The relevant customs codes are as follows:*

*7208 5120 10; 7208 5120 90; 7208 5198 10; 7208 5198 90”*

129. This is consistent with the published submissions and notes to the public file in investigation AD0071 Hot-rolled steel plate from South Korea, where Spartan is the applicant.<sup>19</sup>

130. Liberty Dalzell has stated the following in its registration concerning which category 7 goods it produces:

*“Liberty Steel Dalzell Ltd are a UK based large area plate producer, producing plates in Category 7, codes 7208 5191 00, 7208 5120 00 and 7208 5120 10.*

*Rolling capacities:*

*Up to 3.95m wide trimmed plates, 4.15m untrimmed.*

*Up to 22m long*

*Up to 16.4t in plate weight*

*From 10mm Up to 150mm thick”*

131. Liberty Dalzell have provided additional evidence from its mill management system which supports these statements.

132. The TRA has determined that the evidence provided by TSUK, Spartan, and Liberty Dalzell is sufficient to conclude that goods like the imported goods subject to review, falling under all six commodity codes requested for review by the applicant, are produced in the UK. The TRA has also determined that there is sufficient evidence of category 7 goods production with over 2050mm width and less than 15mm thickness.

133. The TRA has also considered whether there is direct competition between UK produced category 7 goods that are less than 2050mm wide and imported category 7 goods over 2050mm wide.

134. Several parties, such as TSUK, have argued that wide plates can be split, trimmed to size, or welded together such that imported plates wider than 2050mm are directly

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<sup>19</sup> [AD0071 - Hot-rolled steel plate from South Korea, public file](#), accessed 02/02/2026

competitive with UK produced plates under 2050mm. Conversely, parties such as ISTA have stated that these plates are not directly competitive, as the process of splitting or combining plates fundamentally affects the material characteristics of the product and is too costly to be economically viable.

135. We have concluded that within certain end uses there is direct competition between welded or trimmed material, and there is a risk that removal of products from the TRQ would result in a price drop that could make the cost of resizing plate to be economically viable for some end uses. This indicates that there could be increased direct competition between imported plates over 2050mm wide and UK produced plate products under 2050mm wide if the measure were varied to not apply to goods over 2050mm wide.
136. However, evidence provided by ISTA indicates that welding or trimming material would lower the quality of the material such that it would no longer be fit-for-purpose in several end uses. ISTA have also provided evidence that there is a significant cost of cutting the material, which indicates that direct commercial competition would be limited if the price reduction from removing the effect of the safeguard measure is less than the £100/mT of cutting plates to size that ISTA have quoted in its application. We therefore have concluded that it is likely that there would be only limited competition between plate products produced in the UK which are less than 2050mm wide and imported plates that are over 2050mm wide.
137. The TRA has considered whether Babcock's technical requirements for steel are able to be met in the UK. We have compared details about its specific requirements with the capabilities reported by UK steel producers and found that UK industry does produce goods captured by the commodity code Babcock have requested to be reviewed (7208 5120 10). Following comments made in respect to the SIFD we have received evidence that all of Babcock's individual technical requirement can be met by UK producers, but that no individual UK producer can meet all of Babcock's requirements simultaneously. For instance, Spartan can meet its requirements for S-grade flatness but not all its requirements concerning dimensions.
138. The TRA has also considered the quota utilisation of category 7 during the POI to consider whether importers have sufficient access to tariff rate quotas to meet the demand of the UK market.

**Table 5: Quota Utilisation rates of Category 7 during the POI**

	Q2 (Oct 2024 – Dec 2024)			Q3 (Jan 2025 – Mar 2025)			Q4 (April 2025 – June 2025)			Q1 (July 2025 – Sep 2025)		
Country	Quota Available (MT)	Quota used (MT)	Utilisation	Quota Available (MT)	Quota Used (MT)	Utilisation	Quota Available (MT)	Quota Used (MT)	Utilisation	Quota Available (MT)	Quota Used (MT)	Utilisation
EU	96,945	39,034	40%	126,370	61,476	49%	133,277	78,805	59%	71,178	52,642	74%
Residual	28,770	8,937	31%	44,657	19,033	43%	50,723	11,053	22%	25,401	5,909	23%
Republic of Korea	Prior to 1 July 2025, these countries did not have country-specific quotas or were not subject to country-specific caps for category 7 goods									5,080	5,080	100%
Japan										5,080	132	3%
USA										5,080	692	14%
Canada										5,080	0	0%
Taiwan										5,080	6	0%
Switzerland										5,080	0.2	0%
<b>Total</b>	<b>125,715</b>	<b>47,971</b>	<b>38%</b>	<b>171,027</b>	<b>80,510</b>	<b>47%</b>	<b>184,000</b>	<b>89,858</b>	<b>49%</b>	<b>96,579</b>	<b>58,551</b>	<b>61%</b>

139. Table 5 shows the quota utilisation rate in percentage terms for all regions with a country-specific quota. After the safeguard measure was varied on 1 July 2025 to introduce a 20% country-specific cap to the category 7 TRQ the table shows the country-specific cap utilisation of countries without country specific quotas. To calculate these values, we have used the UK Integrated Online Tariff with the same methodology as Table 4.<sup>20,21</sup>

140. Table 5 shows relatively low utilisation until Q1, when certain changes to the application of the tariff rate quotas were implemented from 1 July 2025.<sup>22</sup> In Q2 – Q4 the EU quota utilisation was between 40-59%; in Q1 this increased to 74%.

<sup>20</sup> [UK Integrated Online Tariff quota tool](#)

<sup>21</sup> In our analysis we identified some inconsistencies in the UKIOT data, we have addressed these with HMRC internal data.

<sup>22</sup> These changes to TRQs are stated in [Trade remedies notice 2025/12: safeguard measure: tariff-rate quota on steel goods](#)

141. We note the Republic of Korea in Q1 reached the maximum allowance of residual quota usage available to each country accessing the residual quota, which was capped from 1 July 2025 at 20% per country.
142. Country caps on the residual quota appear to have limited imports under the quota in Q1 although the overall utilisation rate remains low. This shows that the category 7 tariff rate quota for the EU was not fully utilised at any point during the POI and that the residual quota has not been significantly utilised except by importers of goods from the Republic of Korea.
143. The TRA has concluded that the current safeguard measure is sufficiently liberal to allow downstream users of category 7 products to purchase imports from any country other than the Republic of Korea without a significant risk of incurring the out-of-quota safeguarding duty.

## Section F: Conclusion and recommendation

### F1. Conclusion of this review

144. In accordance with regulation 35B(6)(b) of the Safeguard Regulations, the TRA considered whether there has been a change in circumstances, as defined in regulation 35B(9) of the Safeguard Regulations, since the application of the TRQ.
145. We found evidence that parts of the tariff rate quotas were exhausted during the POI, specifically the country-specific caps for categories 4 and 7 were reached in the final quarter of the POI. Therefore, we have concluded that there has been a change in circumstance in accordance with regulation 35B(9)(a) of the Safeguard Regulations.
146. We also found evidence of the TRQs impacting traditional trade flows of categories 4 and 7 goods. Based on this evidence, we have concluded that there has been a change in circumstance in accordance with regulation 35B(9)(e) of the Safeguard Regulations
147. Therefore, we have determined that there has been a change in circumstances since the application of the tariff rate quota, in accordance with regulation 35B(6)(b) of the Safeguard Regulations.
148. In accordance with regulation 35B(6)(c)(i) of the Safeguard Regulations, we decided to further consider whether the TRQ is appropriate for the domestic market conditions. We concluded that overall quota usage is low enough to allow downstream users of categories 4 and 7 products to import the product required for the UK market without incurring the out-of-quota safeguarding duty by importing from regions with unexhausted quotas or country caps that have not been reached.
149. In accordance with regulation 35B(6)(c)(iii) of the Safeguard Regulations, the TRA exercised its discretion to consider other factors it considers relevant. Specifically, we considered whether the allocation of the tariff rate quota is suitable.
150. The TRA examined what we consider like or directly competitive goods within categories 4 and 7. We considered evidence provided by the applicants to the review, evidence provided by interested parties, and HMRC import data.
151. The TRA has concluded that there are like or directly competitive goods produced in the UK for both commodity codes in category 4 requested for review by the applicant ISTA (7210 6100 20 and 7210 6900 80), based on physical and commercial likeness. We also

concluded that the import price of Aluzinc and aluminised steel is sufficiently similar to these like or directly competitive goods that varying the measure to remove these commodity codes would risk serious injury to UK industry. We have concluded that the TRA should not recommend removing these goods from the category 4 TRQ.

152. The TRA has concluded that like and directly competitive goods are produced in the UK for all five commodity codes in category 7 requested for review by the applicant ISTA (7208 5191 00, 7208 5291 00, 7208 5198 00, 7208 5120 00, and 7208 5299 00). We have also identified that goods captured by these commodity codes that are wider than 2050mm and thinner than 15mm are produced in the UK, and there is limited direct competition between UK produced plates under 2050mm wide and imported plate products over 2050mm wide. We have concluded that the TRA should not recommend removing these goods from the category 7 TRQ.
153. We have concluded that category 7 products with all the technical requirements of the applicant Babcock are not produced in the UK. However, the TRA cannot exempt a specific company or technical requirement from the commodity code that the applicant requested to be reviewed (7210 5120 10).

## **F2 Final determination and recommendation**

154. Pursuant to regulation 35B(7)(a) of the Safeguard Regulations, the TRA's final determination is to maintain the tariff rate quota for categories 4 and 7 in accordance with the relevant public notice made under section 13 of the Act.

## Annex 1: FTA partners with a current safeguard exception

Agreement	Multilateral safeguard exception
UK-CARIFORUM EPA (Antigua and Barbuda, Barbados, Belize, the Bahamas <sup>23</sup> , Dominica, The 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.	Active

<sup>23</sup> Not on the WTO Developing Country list

## Annex 2: Developing country members of the WTO<sup>24</sup>

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, Comoros, 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, PRC,<sup>25</sup> 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>24</sup> Some of the below countries have been excluded from the calculation because of the FTA/EPA agreements listed in Annex 1

<sup>25</sup> 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: Commodity codes requested for review in the applications

Product Number	Product Category	Commodity Codes
4	Metallic coated sheet	7210 6100 20 7210 6900 80
7	Non-alloy and other alloy quarto plates	7208 5191 00 7208 5291 00 7208 5198 00 7208 5120 00 7208 5299 00 7208 5120 10

## Annex 4: Tariff Rate Quotas

Quarterly volumes of country and residual tariff-rate quotas (in tonnes) 01/07/25 – 30/06/26 as set out in:

[Trade remedies notice 2025/12: safeguard measure: tariff-rate quota on steel goods](#)

[TQ0085 - Category 4 - Metallic coated sheet from Türkiye – Public File](#)

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 <sup>26</sup>	Individual country quota removed			24,413
	Residual	85,595	85,595	83,735	84,665
	15% country cap within residual quota	12,839	12,839	12,560	12,700
	Total <sup>26</sup>	468,014	468,014	457,840	487,339
7	EU	71,178	71,178	69,631	70,404
	Residual	25,401	25,401	24,849	25,125
	20% country cap within residual quota	5,080	5,080	4,970	5,025
	Total	101,659	101,659	99,450	100,554

<sup>26</sup> The individual country quota category 4 products from Türkiye is conditional on the outcome of the TRQ review TQ0085, which [can be accessed via the public file for this review](#). The total quota for category 4 without Türkiye is 462,926 tonnes.