

Subject: Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey

Non-confidential

16 January 2026

1. Introduction

Tata Steel UK Limited (“TSUK”) is a domestic producer of a number of steel products covered by the UK safeguard measures, including metallic coated sheet (“MCS”) falling under product category (“Category”) 4.

TSUK hereby respectfully requests that the Trade Remedies Authority (“TRA”) initiate a tariff rate quota (“TRQ”) review pursuant to Regulation 35B of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (the “Safeguards Regulations”), on the basis that Turkey no longer meets the conditions for exemption from the safeguard measure applicable to Category 4.

As set out below, TSUK submits that there has been a clear and material change in circumstances since Turkey was granted an exemption following the previous review (TQ0066), namely that imports of MCS from Turkey have increased sharply and now exceed the 3% threshold relevant for the developing-country exemption.

2. There has been a change in circumstances calling for a TRQ review

2.1. Legal basis

Pursuant to Regulation 35B(1), a TRQ review may be initiated where “*there is sufficient information indicating that there may have been a change in circumstances since the application of that tariff rate quota to those goods*”.

Regulation 35B(9) sets out a non-exhaustive list of changes in circumstances that may justify such a review, including, in particular:

“...the fact that imports from a developing country member of the WTO which have been excluded from the application of the tariff rate quota can no longer be excluded under regulation 43 (developing country exception).”

The present request falls within the above-described category.

2.2. Import developments for MCS from Turkey

Turkey was granted an exemption from the safeguard measure for Category 4 following the previous review (TQ0066), on the basis that its historical import volumes of MCS into the UK were negligible and well below the 3% threshold. As a result, since 1 July 2025, imports of MCS from Turkey had become exempt from the safeguard measures.

Since that determination, import patterns have changed substantially. Based on HMRC import data for the most recent 12-month reference period (December 2024 – November 2025), imports of MCS from Turkey amounted to approximately **37,523 tonnes**, corresponding to an **import share of 3.9%** of total UK imports of Category 4. As demonstrated in Table 1 below, Turkey's rapidly increased import share is the result of a pronounced spike in imports beginning in September, when imports from Turkey grew from previously negligible levels to volumes of c. 11kt in September-October and c. 14kt in November.

Table 1. Imports of MCS from Turkey, Dec'24-Nov'25 (tonnes)

| | Dec'24-Aug'25 | Sep'25 | Oct'25 | Nov'25 | Dec'24-Nov'25 |
|-----------|---------------|--------|---------|--------|----------------|
| Total | 669,844 | 86,977 | 131,890 | 75,441 | 964,153 |
| Turkey | 537 | 11,775 | 11,063 | 14,149 | 37,523 |
| Turkey, % | 0.08 | 13.5% | 8.4% | 18.8% | 3.9% |

Source: HMRC

This import data clearly shows that Turkey has exceeded the 3% threshold relevant for exemption eligibility and therefore no longer qualifies for exclusion from the safeguard measure applicable to Category 4.

Moreover, to the best of TSUK's knowledge, imports from Turkey remained elevated in December, and further imports are expected to continue at significant levels going forward.

This pattern confirms that the increase in imports is structural rather than temporary, and that Turkey has taken advantage of its exempt status to expand exports rapidly once the safeguard constraint was removed.

2.3. Immediate impact on the UK industry requires an urgent action

The surge in imports from Turkey has already had a significant negative impact on TSUK as the sole domestic producer of MCS in the UK, both financially and operationally.

In particular:

- TSUK's estimated loss of revenue attributable to volume displacement and price suppression is approximately [CONFIDENTIAL – sensitive information related to TSUK's revenue losses];
- Associated margin loss is estimated at approximately [CONFIDENTIAL – sensitive information related to TSUK's margin losses]; and
- The impact has been sufficiently severe that TSUK has been forced to extend the maintenance shutdown at its Llanwern site to [CONFIDENTIAL – sensitive information related to TSUK's maintenance shutdown] weeks, compared to a

normal duration of [CONFIDENTIAL – sensitive information related to TSUK's maintenance shutdown] weeks.

If the current import trend continues, it is likely to have severe consequences for TSUK's operations, employment, and investment capacity. Therefore, the economic significance of the change in circumstances underscores the need for timely corrective action.

3. Conclusion

In light of the foregoing, TSUK submits that there is sufficient information indicating a change in circumstances within the meaning of Regulation 35B, namely that imports of MCS from Turkey have increased to such an extent that Turkey no longer qualifies for the developing-country exemption.

TSUK therefore respectfully requests the TRA to:

- initiate a TRQ review in respect of Category 4;
- determine that Turkey has exceeded the 3% import share threshold based on the most recent available import data;
- revoke Turkey's exemption from the safeguard measure for Category 4; and
- reallocate imports from Turkey to the residual quota with effect from 1 March, or the earliest administratively practicable date.

TSUK notes that this adjustment can be implemented without any modification to the overall quota volumes applicable to Category 4.