



Trade Remedies
Authority

Suspension Recommendation

Case No. SS0051

**Suspension Review of the safeguard measure
applying to Category 1 steel products**

Contents

SECTION A: Introduction	3
SECTION B: Summary and findings	4
SECTION C: Temporary change in market conditions	8
SECTION D: Assessment of injury	13
SECTION E: Other factors	15
E1 Appropriateness of suspension	15
E2 Opportunity for comment	15
E3 Period of Suspension.....	15
SECTION F: Final recommendation.....	17

SECTION A: Introduction

1. This is a suspension review concerning the steel safeguards measure applying to Category 1 steel products. The [Notice of Initiation](#) (NOI) was published on 9 February 2024. The scope of the goods subject to review, as detailed in the NOI, is defined in [section B4](#).
2. This section summarises the legal framework for this suspension recommendation and the Trade Remedies Authority (TRA)'s findings. The background to the review and further detail on all aspects are set out in the body of the report.
3. This final report sets out the reasons for the TRA's determination when making its final recommendation to the Secretary of State. Other documents available on the [public file](#).
4. For further guidance and information regarding suspension reviews, please see our [public guidance](#).

A1 Legal framework

5. The initiation of this suspension review was made after receiving two applications pursuant to regulation 40(2) of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (as amended) (the Safeguard Regulations). The TRA determined that the applications provided sufficient information on the following conditions:
 - there was a change in the market conditions;
 - the nature of that change was temporary; and
 - there was an effect on UK producers from that change.
6. This suspension recommendation is made pursuant to regulation 39 of the Safeguard Regulations. The TRA may make a suspension recommendation where:
 - market conditions have changed temporarily;
 - as a consequence of the change in market conditions, the serious injury caused to UK producers is unlikely to recur if the application of a definitive safeguarding remedy were to be suspended;
 - the TRA is satisfied that a suspension is appropriate; and
 - the UK producers have been given the opportunity to comment on the suspension proposed.
7. As per regulation 39(8), where the TRA considers it appropriate to make a suspension recommendation, the recommendation must include:
 - the reasons for its determination;
 - the recommended period of suspension; and
 - any other information the TRA considers relevant.

SECTION B: Summary and findings

B1 Summary

8. The steel safeguards measure applying to 15 product categories, was imposed as a result of the reconsideration of the transition review TF0006 from 1 July 2022. The [Trade Remedies Notice 2022/01](#) was published by the Secretary of State on 30 June 2022.
9. Subsequently, the TQ0030 TRQ review amended the quota volumes for Category 1 steel products from 1 July 2023, having recommended varying the developing country exemptions and resulting TRQ allocations. The [Trade Remedies Notice 2023/10](#) was published on 30 June 2023.
10. The current safeguard measure is due to expire on 30 June 2024. On 4 September 2023, the TRA initiated an [extension review](#) in relation to the steel safeguards measure on all 15 product categories. This review considered an historic reference period of 1 April 2018 to 31 March 2023, which was prior to the change in market conditions that are the subject of this review. The safeguard extension review published its intended final determination on 21 February 2024, in which it has recommended extending the measure to 30 June 2026. This would be the final extension in accordance with the WTO safeguard agreement and the UK's domestic regulations. The Secretary of State for Business and Trade has yet to take a decision on this extension.
11. In December 2023, the TRA received a suspension application for Category 1 steel products from a UK importer trade association and in February 2024, the TRA received a second suspension application for Category 1 steel products from a UK producer. The applications contained information indicating that there has been a change in market conditions of a temporary nature. We found that the applicants provided sufficient information to justify initiating this suspension review.
12. The TRA considered this information in accordance with the conditions set out under regulations 39(4) and 40(2) of the Safeguard Regulations and initiated this review on 9 February 2024. The TRA stated its intended recommendation in the NOI and Registration form, inviting interested parties and contributors to comment on the proposal.
13. The TRA also received two applications for a TRQ review in relation to Category 1 steel products, citing a change in circumstances since the application of the TRQ on 1 July 2023. We found that the applications contained sufficient information to justify initiating a TRQ review, and therefore, we initiated the TRQ review, [TQ0052](#), on 9 February 2024.

B2 Interested parties and contributors

14. The following interested parties and contributors registered to the suspension review:

Name	Abbreviation	Country	Category
TATA Steel UK Limited	TSUK	UK	Producer of the goods subject to review
Kromat Trading Limited	Kromat	UK	Importer of the goods subject to review
Duferco UK Limited	Duferco	UK	Importer of the goods subject to review
OPR Services Ltd	OPR	UK	Importer of the goods subject to review
Salzgitter Mannesmann UK Limited	Salzgitter	UK	Importer of the goods subject to review
Sebden Steel Service Centres Limited	Sebden	UK	Importer of the goods subject to review
Stemcor Distribution Limited	Stemcor	UK	Importer of the goods subject to review
Thyssenkrupp Materials (UK) Limited	Thyssenkrupp	UK	Importer of the goods subject to review
Erdemir – Ereğli Demir ve Çelik Fab. T.A.S	Erdemir	Türkiye	Exporter of the goods subject to review
POSCO	POSCO	South Korea	Exporter of the goods subject to review
Ministry of Trade of Republic of Turkey	Government of Türkiye	Türkiye	Foreign Government
MOTIE	Government of South Korea	South Korea	Foreign Government
Embassy of Switzerland in the UK	Swiss Embassy	Switzerland	Foreign Government
EEF Limited	EEF	UK	Trade Association
International Steel Trade Association	ISTA	UK	Trade Association

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

B3 Treatment of information

16. The case team assessed whether information and comments provided by interested parties and contributors registered to the case, and any other material information from secondary sources was accurate. To do this, the case team cross-checked submissions against other submissions, and publicly available information.
17. We assessed the information provided with appropriate circumspection, and are satisfied that the information provided by interested parties and contributors is able to be used to inform our assessment of whether there is a temporary change in market conditions and if serious injury was likely to recur.

B4 Description of the goods subject to review

18. As set out in the [Notice of Initiation](#) the description of the goods subject to review are as follows:

Category 1 steel - non-alloy and other alloy hot rolled sheets and strips.

19. The goods subject to review are currently classifiable within the following commodity code(s);

72081000, 72082500, 72082600, 72082700, 72083600, 72083700, 72083800, 72083900, 72084000, 72085210, 72085299, 72085310, 72085390, 72085400, 72111300, 72111400, 72111900, 72126000, 72251910, 72253010, 72253030, 72253090, 72254015, 72254090, 72261910, 72269120, 72269191, 72269199.

B5 Assessment of whether market conditions have changed temporarily

20. In accordance with regulation 39(4)(a) of the Safeguard Regulations, we considered whether market conditions have changed temporarily in relation to the goods subject to review.
21. In [section C](#), we consider the change in market conditions as a result of the sole active UK producer's reduction in production of Category 1 steel products. We also consider the temporary nature of that change as a result of the UK producer's proposed transition to Electric Arc Furnace (EAF) steelmaking. We determined that there is a temporary change in market conditions as a result of the decision by the sole active UK producer, TSUK, to close its blast furnaces and coke ovens, as those heavy-end assets reach the end of their operational life, and part of its decarbonisation programme.

B6 Assessment of whether serious injury is likely to recur to UK producers

22. In accordance with regulations 39(4)(b) of the Safeguard Regulations, we considered whether as a consequence of the change in market conditions, serious injury to the UK producers would likely recur if the application of a definitive safeguarding remedy were to be suspended.
23. In [section D](#), we determined that as TSUK was an applicant to this review, and that it had informed the TRA that it planned to temporarily reduce production of Category 1 steel products, that the serious injury caused to UK producers is unlikely to recur while a suspension is in effect.

B7 Appropriateness of suspension

24. In accordance with regulation 39(2)(b) of the Safeguard Regulations, the TRA may make a suspension recommendation where it is satisfied that it is appropriate to do so.
25. As a result of the reduction in TSUK's production capacity of Category 1 steel products and the consequent exhaustion of the residual quota on Category 1 steel products, there is limited domestic supply, therefore we are satisfied that a suspension is appropriate.

B8 UK Producers have had the opportunity to comment

26. In accordance with regulation 39(2)(c) of the Safeguard Regulations, the TRA may make a suspension recommendation where UK producers have had the opportunity to comment on the suspension proposed in the suspension application.
27. Following the publication of the NOI, interested parties and contributors were granted 15 days to comment on our proposed recommendation. TSUK, who is the sole active UK producer, supplied a registration form which has given them the opportunity to comment.

B9 Final recommendation

28. In accordance with regulation 39(2) of the Safeguard Regulations, the TRA may make a suspension recommendation where factors set out in [section A1](#) have been met.
29. Our final recommendation is to suspend the application of the definitive safeguarding remedy on Category 1 steel products under regulation 39 of the Safeguard Regulations for a period not exceeding nine months in accordance with regulation 41 of the Safeguard Regulations.

SECTION C: Temporary change in market conditions

C1 Introduction

30. We are required under regulation 39(4)(a) of the Safeguard Regulations to consider whether market conditions have changed temporarily.
31. To conduct this assessment, we considered:
- The change in market conditions; and
 - The temporary nature of that change.

C2 Change in market conditions

32. In its application¹, TSUK stated that it is the sole active UK domestic producer of the goods subject to review. The goods as defined in [section B4](#) are Category 1 steel products, or better known as Hot-Rolled Flat and Coil. These products are the input material for a wide range of other downstream products, including: cold-rolled steel, metallic coated steel, organic coated steel, packing and other tubular products.
33. During the registration period, no other interested party came forward to indicate that it produced Category 1 steel products, and all participating UK importers recognised TSUK as the sole active domestic producer of Category 1 steel products.
34. In its application², TSUK stated that “it has been severely impacted by stability issues on its blast furnaces ... which has had a knock on effect on TSUK’s hot-rolling mill”. TSUK claimed that these ongoing performance issues have affected its downstream production and financial performance. TSUK noted that in order to remedy these stability issues, it has imported Category 1 steel products from third countries over the last year. These imports have been reflected in the Category 1 TRQ residual quota being exhausted early in every quarter over the same period. This is likely to continue in the short term, as TSUK’s production of Category 1 steel products is likely to reduce by at least 50% once it closes its blast furnaces this year - which is insufficient to meet the needs of its own downstream production. TSUK plan to supplement its own production with imports of Category 1 steel products for its downstream use but the Category 1 TRQ, as currently allocated, is not adequate to counter the change in market conditions considered here and is relevant in considering whether the Category 1 steel products market is functioning properly.

¹ TSUK Application (trade-remedies.service.gov.uk)

² TSUK Application (trade-remedies.service.gov.uk)

35. This has been recognised by ISTA, who stated in its application³ that the market conditions have changed as a result of “the entry of domestic producer Tata into the import market”. ISTA represents a number of the UK importers participating in this review, who share this view. Additionally, ISTA outlines concern that the residual quota of the Category 1 TRQ, has been exhausted over a number of quarters. The submissions made by UK importers, such as Kromat⁴, Duferco⁵, OPR⁶, Sebden⁷, Stemcor⁸ and Thyssenkrupp⁹ share the view that market conditions have changed as a result of the reduction in TSUK’s production, the consequent limited domestic supply of the goods and the impact this is having on wider UK industry.
36. Both participating exporters, POSCO and Erdemir, cited TSUK’s reduction in production as a change in market conditions. Erdemir stated in its submission¹⁰ that as TSUK intends to cease blast furnace operations, therefore reducing domestic supply, there is a clear demand for imports of the goods by UK importers, as well as TSUK. POSCO noted in its submission¹¹ that “as the only supplier of HRFC struggling to supply itself as well as the UK market at large, there is a need to procure HRFC from other sources, i.e., imports from third countries”.
37. Additionally, both participating foreign governments, South Korea¹² and Switzerland¹³, also drew attention to TSUK’s reduction in production and resulting imports as a change in market conditions.
38. On 19 January 2024, TSUK formally announced its intention to close both blast furnaces and coke ovens this year and begin statutory consultations¹⁴.
39. In summary, TSUK has reduced its production of Category 1 steel products as a result of instability issues with its blast furnaces and it intends to close these blast furnaces permanently during 2024. In order to maintain downstream production, TSUK has imported Category 1 steel products from third countries. The present TRQ on Category 1 steel products is not sufficient for the current demand, and importers and distributors of Category 1 steel products are struggling to import the necessary supply without incurring the safeguarding duty of 25%. TSUK has announced that

³ ISTA Application (trade-remedies.service.gov.uk)

⁴ Kromat Submission (trade-remedies.service.gov.uk)

⁵ Duferco Submission (trade-remedies.service.gov.uk)

⁶ OPR Submission (trade-remedies.service.gov.uk)

⁷ Sebden Submission (trade-remedies.service.gov.uk)

⁸ Stemcor Submission (trade-remedies.service.gov.uk)

⁹ Thyssenkrupp Submission (trade-remedies.service.gov.uk)

¹⁰ Erdemir Submission (trade-remedies.service.gov.uk)

¹¹ POSCO Submission (trade-remedies.service.gov.uk)

¹² MOTIE Submission (trade-remedies.service.gov.uk)

¹³ Government of Switzerland Submission (trade-remedies.service.gov.uk)

¹⁴ Tata Steel Website ([Tata Steel announces next steps...](https://www.tatasteel.com/news/2024/01/19/tata-steel-announces-next-steps...))

it intends to close both blast furnaces this year, further constraining domestic supply, which the TRA finds that this represents a change in market conditions for Category 1 steel products.

C3 Temporary nature of that change

40. In its application¹⁵, TSUK stated that the change in market conditions is of a temporary nature as it is undertaking a transition to EAF steelmaking. On 15 September 2023, TSUK and the UK Government agreed a joint investment project of up to £1.25 billion to fund the installation of an EAF in Port Talbot, to replace the aging and carbon intensive coal-fired blast furnaces.
41. S&P Global¹⁶ state that in recent years TSUK has produced around 3.2 million m/t a year and the new EAF will have a capacity of 3 million m/t a year. Therefore, once the EAF is operational, TSUK will continue to produce Category 1 steel products, in approximately similar volumes.
42. TSUK acknowledged that there would be disruption to its production during the transition period, as “Port Talbot’s two high-emission blast furnaces and coke ovens would close in a phased manner with the first blast furnace closing around mid-2024 and the remaining heavy end assets would wind down during the second half of 2024”¹⁷. In order to meet its own demand for downstream production, TSUK have stated that it is “utilising imported semi-finished steel including from Tata Steel plants in the Netherlands and India as well as other select strategic suppliers until the commencement of Electric Arc Furnace production”.
43. ISTA acknowledges the impact of TSUK’s transition to EAF in its application¹⁸, stating that TSUK’s plan to “idle their blast furnaces pending transition to EAF and importing... will completely turn things on their head”. ISTA indicate that the volume of imports necessary for TSUK to maintain downstream production, would far exceed the current TRQ quota on Category 1 steel products, subjecting importers as well as TSUK to the 25% safeguarding duty.
44. The sentiment outlined in ISTA’s application, is shared by a number of importers who commented on the impact of TSUK’s transition on their businesses. Kromat¹⁹, Duferco²⁰, Sebden²¹ and Stemcor²² acknowledge

¹⁵ TSUK Application (trade-remedies.service.gov.uk)

¹⁶ S&P Global ([Tata Steel UK to close both blast furnaces this year...](#))

¹⁷ Tata Steel Website ([Tata Steel announces next steps...](#))

¹⁸ ISTA Application (trade-remedies.service.gov.uk)

¹⁹ Kromat Submission (trade-remedies.service.gov.uk)

²⁰ Duferco Submission (trade-remedies.service.gov.uk)

²¹ Sebden Submission (trade-remedies.service.gov.uk)

²² Stemcor Submission (trade-remedies.service.gov.uk)

TSUK's temporary transition; however, share concern on the 25% duty that is likely to face importers, should the measure not be suspended.

45. This is supported by His Majesty's Revenue and Customs (HMRC) import data, which shows that the residual quota of the Category 1 TRQ has been repeatedly exhausted over three of the last four quarters. Given TSUK's public position²³ that it intends to continue importing the goods from India, among other sources, the residual quota is likely to continue to be exhausted in the absence of the TRQ for Category 1 steel products being amended.
46. Erdemir, who is a Turkish exporter acknowledged the transformation programme in its submission²⁴. Erdemir also noted that "transformation processes may take longer than expectations", and note the need for "balanced supply security..." of the goods subject to review.
47. POSCO, who is a South Korean Exporter, submitted²⁵ that TSUK's transition to EAF "will require a temporary closing down of TSUK's HRFC production facilities... The transition to EAF by TSUK is required in the wider context of the UK's net zero initiatives..."
48. The Government of South Korea stated in its submission²⁶ that "it is clear that the change in market conditions is temporary in that the technical adjustment takes a certain period of time before its product line's renewal and in that it will resume once it is ready. Indeed, the TSUK's transition to EAF-based steel making is only temporary in nature as it announced that the expected time of transition will likely be 36 months". As highlighted in paragraph 41, TSUK's EAF production volumes would be approximately similar to current blast furnace production volumes.
49. Therefore, all interested parties and contributors recognise TSUK's proposed transition to EAF steelmaking which will mean that TSUK is not able to produce the volume of Category 1 steel products that it has to date and will supplement a smaller volume of Category 1 steel goods production with imports of the same product. Interested parties and contributors also cite the volume of Category 1 imports required for TSUK's downstream production, in addition to other UK users, is considerably more than the present TRQ for Category 1 steel products facilitates. The TRA is also undertaking a TRQ review on Category 1 steel products²⁷. This review aims to address the Category 1 TRQ, to ensure that the TRQ balances the need for protection of the UK producer of the goods with business's need to access steel products. When these issues have been resolved, it may be

²³ Tata Steel Website ([Tata Steel announces next steps...](#))

²⁴ Erdemir Submission ([trade-remedies.service.gov.uk](#))

²⁵ POSCO Submission ([trade-remedies.service.gov.uk](#))

²⁶ Government of South Korea Submission ([trade-remedies.service.gov.uk](#))

²⁷ TQ0052 TRQ Review Public File ([trade-remedies.service.gov.uk](#))

that the conditions resulting in our recommendation to suspend the safeguard measure for Category 1 steel products will no longer exist.

C4 Conclusion

50. The TRA has received information from TSUK and UK importers, amongst others, that the market conditions for Category 1 steel products in the UK have changed. We find that the reduction in steel production capacity in Port Talbot and the subsequent need for additional imports to ensure the UK has a sufficient supply of Category 1 steel products represents a change in market conditions.
51. We believe this change in market conditions to be of a temporary nature, as TSUK is undertaking a transformation programme and upon completion, will return to Category 1 steel production. However, while TSUK need to import large amounts of Category 1 steel, the current Category 1 TRQ needs to be reviewed to ensure it is appropriate for the current situation. A suspension allows this review to be conducted and ensures all parties across the UK steel industry can access the product they need.
52. The TRA therefore concludes that there is a temporary change in the UK Category 1 market conditions.

SECTION D: Assessment of injury

D1 Introduction

53. We are required under regulation 39(4)(b) of the Safeguard Regulations to consider whether as a consequence of the change in market conditions, the serious injury caused to a UK producer is unlikely to recur if the application of the definitive safeguarding remedy on Category 1 steel products were to be suspended.
54. In order to conduct the assessment of injury we considered:
- UK's domestic production capacity.

D2 UK's capacity to produce the goods subject to review

55. As established in [C2: change in market conditions](#), TSUK is the sole active UK domestic producer of Category 1 steel products. On 19 January 2024, TSUK announced its intention to close both blast furnaces this year, as they reach the end of their operational life.
56. TSUK acknowledged in its application²⁸ that there will be a transition period between the phased closures of blast furnaces and proposed EAF steelmaking. TSUK notes that it “may have to rely on imports of HRFS from third countries for its downstream operations during the transition period”. Noting that “this will not be possible without a suspension of the quota applicable to PC 1, as the associated costs (i.e. the 25% duty applicable to imports made in excess of the quota) will mean that downstream processing is not economically viable”.
57. Therefore, TSUK's position, as the sole active UK producer, is that serious injury is unlikely to recur to UK producers if the measure were to be suspended. Further to this, TSUK has outlined that without a suspension, it would be unable to process downstream products and potentially face further injury.
58. A number of UK importers and an overseas exporter also commented on the absence of serious injury, if the measure was suspended and TSUK was not producing the goods. Stemcor's submission²⁹ notes the impact the current measure is having on wider UK industry and states that “if safeguarding measures are not suspended, then the UK industry is likely to see an increase in the cost of goods subject to review” echoing TSUK's point. Stemcor go on to highlight that as “TATA [TSUK] will have to import

²⁸ TSUK Application (trade-remedies.service.gov.uk)

²⁹ Stemcor Submission (trade-remedies.service.gov.uk)

these products, it is all but certain that the current TRQ residual quota will be fully utilised every quarter resulting in the application of the 25% safeguarding duty on all additional imports”.

59. POSCO highlighted in its submission, that while Liberty Steel have a hot rolling mill, Liberty “announced in early 2023 to indefinitely mothball its HRFC production facility”. This accords with our understanding of the UK market, that no other party in the UK is likely to emerge as a producer in the short-medium term and reaffirms TSUK as the sole active UK producer.
60. In summary, TSUK brought this application for suspension to the TRA indicating it would not be seriously injured as a result of a temporary suspension of the measure on Category 1 steel products.

D5 Conclusion

61. We have assessed whether as a consequence of the temporary change in market conditions, serious injury would be likely to recur to UK producers.
62. The TRA has already concluded that:
 - TSUK has a reduced production capacity for Category 1 steel products as a result of its blast furnace instability issues in addition to its proposed transformation programme; and
 - The change in market conditions is of a temporary nature as TSUK will return to producing Category 1 steel products, and the TRA are undertaking a TRQ review to ensure appropriate supply of Category 1 steel products to reflect current market conditions.
63. Therefore, based on our assessment of serious injury, we conclude that as a consequence of the change in market conditions, the serious injury caused to UK producers is unlikely to recur, if the safeguarding remedy applied to Category 1 steel products were to be suspended.

SECTION E: Other factors

E1 Appropriateness of suspension

64. Regulation 39(2)(b) of the Safeguard Regulations states that “the TRA may make a suspension recommendation where it is satisfied that it is appropriate”.
65. As stated previously, the only UK producer of Category 1 steel products, TSUK, is an applicant to this suspension review and has outlined that it believes it is appropriate to temporarily suspend the safeguarding measure on Category 1 steel products, while the TRA addresses the associated supply issues with the Category 1 TRQ.
66. All participating importers and exporters, with the exception of OPR, support the temporary suspension of the measure on Category 1 steel products. OPR stated in its submission³⁰, that “a temporary suspension of category 1 quota will cause further panic in the market with potentially cheap steel arriving in the UK with no real demand to support it”. We disagree with this statement, as information provided to the TRA by interested parties indicates that there is substantial demand for the goods, particularly in light of TSUK’s recent announcement.
67. As a result, the TRA finds that it is appropriate to suspend the measure to provide temporary relief in the Category 1 market and ensure an appropriate supply of the goods.

E2 Opportunity for comment

68. Regulation 39(2)(c) of the Safeguard Regulations states that “the TRA may make a suspension recommendation where UK producers have been given the opportunity to comment on the suspension proposed in the application for suspension”.
69. TSUK is the sole active UK producer and brought the application to the TRA, alongside another interested party, therefore fulfilling this obligation. The TRA contacted other UK steel producers who have historically produced Category 1 steel products, and both, British Steel and Liberty, indicated that they no longer produce Category 1 steel products.

E3 Period of Suspension

70. Regulation 41 of the Safeguard Regulations sets out the conditions for establishing the period of suspension, which must not exceed nine months

³⁰ OPR Submission (trade-remedies.service.gov.uk)

but may be extended to twenty-one months following an application by an interested party, or where the TRA considers it appropriate.

71. In its submission³¹, Duferco highlighted that “steel consumers in the UK purchase imported material on 3-6 month lead times. Therefore, suspending the measure for three months... will not have any net-positive effect in assisting the market with imports of material”.
72. Additionally, as explained in this recommendation, the TRA is undertaking a TRQ review, and upon the expiry of this suspension, will consider whether the suspension should be extended or reinstated. However, acknowledging the complexities and implementation lead times for the TRQ review, the TRA finds that it is appropriate to recommend suspending the measure for a period of nine months.
73. However, should the circumstances in regulation 39(4) no longer exist, the TRA may make a recommendation to reinstate the measure under regulation 42 of the Safeguard Regulations.

³¹ Duferco Submission (trade-remedies.service.gov.uk)

SECTION F: Final recommendation

75. We are making a suspension recommendation on the grounds that:

- Market conditions have changed temporarily as a result of TSUK's blast furnace instability issues and proposed transition period to EAF, necessitating the need for additional imports of Category 1 steel products, as established in [section C](#);
- As a consequence of the change in market conditions, the serious injury caused to a UK producer is unlikely to recur if the application of the definitive safeguarding duty on Category 1 steel products were to be suspended, as established in [section D](#);
- The TRA is satisfied that a suspension is appropriate, as established in [Section E](#); and
- The UK producers have been given the opportunity to comment on the suspension proposed in the application for suspension, as laid out in the NOI³². The sole active UK producer – and wider UK industry – is supportive of the suspension of the safeguarding duty on Category 1 steel products, as established in [Section E](#).

F1 Final recommendation

76. Our final recommendation is therefore to suspend the application of the definitive safeguarding duty on Category 1 steel products under regulation 39 of the Safeguard Regulations. We recommend suspending the safeguarding amount for a period of nine months in accordance with regulation 41 of the Safeguard Regulations.

³² Notice of Initiation (trade-remedies.service.gov.uk)