



☐ Confidential

☐ Non-Confidential

## Register as a contributor to the case

### Safeguard measures on certain steel products

#### Case: TF0006

**Period of Investigation (POI):**

2013 - 2017

**Most Recent Period (MRP):**

1 January 2018 to 30 June 2020

**Deadline for response:**

15 October 2020

**Case Team Contact:**

Imogen Yapp, Lead Investigator,  
TF0006@traderemedies.gov.uk

**Completed on behalf of:**

BIRFA

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

☐ Confidential

☒ Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version**. Both copies should be returned to TRID using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by 15 October 2020.



Department for  
International Trade

**OFFICIAL**

Trade Remedies Investigations Directorate

☐ Confidential

☐ Non-Confidential

For further information regarding the POI or MRP, please see the Notice of initiation on the [public file](#).

☐ Confidential      ☐ Non-Confidential

## Contents

Section A – Your organisation’s interest in the case.....	4
Section B – Additional information .....	6
Section C – Certification.....	7



☐ Confidential

☐ Non-Confidential

## Section A – Your organisation’s interest in the case

To register your organisation’s interest in this case, please complete the text boxes below. You should use this form if you are not a UK producer, UK importer or overseas exporter of the goods subject to review, like goods or directly competitive goods. For a definition of goods subject to review/ like goods/ directly competitive goods, please refer to the Notice of Initiation.

1. Please describe the role of your organisation in relation to the goods subject to review, like goods or directly competitive goods:

*Please answer here*

BIRFA is a trade association representing the independent fabricators of steel reinforcement for construction. Its members use around 300kt steel per annum in product categories 13 (rebars) and 16 (non alloy and other alloy wire rod). The majority of this steel is purchased through traders, although some purchases are made directly with mills. Since 2012 there has only been one UK supplier of rebars and rebar in coil. Because this supplier also owns around 50% of the UK reinforcement fabrication industry, there is always conflict with them supplying the other independents. Further, they have proved an unreliable source, both from the mill directly, and through their fabrication companies to the construction sector. The independent fabrication companies, including BIRFA members, are highly dependent upon imported steel supply to maintain the supply chain to the construction industry.

2. Please describe your interest in this case:



□ Confidential

□ Non-Confidential

*BIRFA has a number of concerns about the proposed safeguard measures.*

- 1. Although the overall quota for **rebars** seems about right, its allocation to specific countries is problematic. Our members can only buy from CARES approved mills, and increasingly these have to be approved for Sustainability too, in order to satisfy contractors and clients. This means that non-EU imports have to come from Belarus, Turkey and Ukraine, as these are the only countries that are both sustainable sources and commercially viable to supply UK. The proposed country quotas do not reflect this, and if enforced will drive purchases to non-sustainable sources, contrary to government policy and construction industry objectives.*
- 2. The quota for wire rod will be used by a number of different industrial sectors though reinforcement is one of the largest users. We would prefer to see the two tariff codes used for reinforcement (7213 10 00 and 7213 91 10) treated as a separate Product Number, in order to prevent conflict between different industrial sectors.*
- 3. As these measures are in place to protect UK steel producers we do not believe it is reasonable that they should be able to import material themselves against these quotas. Both CELSA and Arcelor Mittal do import into the UK themselves for reinforcement fabrication.*
- 4. Now that HS2 is underway we expect UK demand for reinforcing steel to increase quite rapidly. It is of paramount importance that the supply chains for this and other major infrastructure projects are not impaired. We would like an assurance that if proven necessary material can be imported outside of the quota, or the quotas can be revised upwards with quick effect.*

☐ Confidential

☐ Non-Confidential

## Section B – Additional information

Use the box below to provide any other relevant information which you think would be useful to help our review.

This may include:

- other parties which you think should be invited to register an interest in the case;
- scope of the review, including product categories and/or custom codes you think should be added or removed, and reasons why; or
- anything else you consider relevant.

*Please answer here*