

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:	Firth Steels Limited

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) by 15 October 2020.

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

Contents

Section A – Your organisation’s interest in the case.....	3
Section B – Additional information	4
Section C – Certification.....	6



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:

We purchase Organic Coated Steel products from South Korea from importers and traders.

2. Please describe your interest in this case:

We are concerned that the quotas are nowhere near enough to enable continuous supply for the whole of the UK market at the levels that we see.

There needs to be an immediate correction of the quantities from circa 3,800 tonnes per quarter to 17,000 tonnes per quarter, otherwise there will be an immediate impact on the UK building envelope industry.

Our business alone in Calendar Year 2019, used around 9,000 tonnes of Organic Coated Steel – so you can see just how large the shortfall is going to be.

The UK does not have the inherent capacity to replace this shortfall in available supply, added to which all other potential sources, including those from the EU, will have their own tariff quotas applied, so that they too will be prevented from increasing sales to the UK and replacing the shortfall.

Failure to adhere to our requests will result in our production being slashed, and likely that of many others in our marketplace. And ultimately this will result in new construction being impaired or even ceasing.



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.

Annex 1 is Commodity Codes 7210 70 80, 7212 40 80

Annex 2 is Product Category 5 and specifically concerning the initial calculations of 3,798 tonnes in first quarter, rising to 3,841 tonnes per quarter following.

The UK quotas which were announced by the Department for International Trade last week in their Safeguarding memo and declaration 2020/06 are based on the average imports of 2015 to 2017.

We understand that these have then been increased three times (+5%, +3%, +3%) in order to follow the same policy as the EU.

The average of these three years is 13,829 tonnes which when increased in line with EU is 15,405 tonnes total annual quota. This is then allocated quarterly, which is where the announced quarterly quota for South Korean Organic Coated Steel of approximately 3,800 tonnes comes from.

We believe the source data for the size of this market and its requirements for the UK has been incorrectly calculated and split out of the Europe quotas from South Korea (incorrect absorption and attraction to the UK).

If the correct historic import statistics were used, the South Korean Organic Coated Steel quarterly quota would be approximately 12,800 tonnes (51,000 tonnes annually).

Please also note that even if the UK used the correct historic figures and increased the quota to approximately 51,000 tonnes annually, with the recent growth of the UK Organic Coated Steel market, there would still not be sufficient quota to satisfy the UK demand which was closer to 70,000 tonnes in 2019.

This is because in recent years, the UK has been increasing its share of imports relative to other EU countries.



Please also note that the usage of these products has increased significantly due to the needs of the building of infrastructure for Outfill and Fasttrack Data Centres and Distribution Centres , Warehouses and other such Commercial and Industrial buildings which are driven by the out of town internet model.

As you can see the difference between what the UK needs for this sector of the market and based on what has been allocated in the safeguarding measures, that some error in the calculation has occurred as 3,800 tonnes per quarter is 15,200 tonnes per year which is way short of the 51,000 tonnes which should have been the original calculation at 2015 to 2017 run rates, and indeed well short of the currently needed 70,000 tonnes which is what we believe the current run rate to be which is subsumed as part of the EU total currently being brought across.