



**REPUBLIC OF TÜRKİYE
MINISTRY OF TRADE
Directorate General for Imports**

OFFICIAL VIEWS OF THE GOVERNMENT OF TÜRKİYE

**on the Statement of Intended Final Determination of
Tariff Rate Quota Review of
Safeguard Measure Concerning
Imports of**

“Certain Steel Products”

May 21, 2025



Trade Remedies Authority (TRA) initiated a Tariff Rate Quota (TRQ) review on February 28, 2025. Furthermore, on March 26, 2025, TRA expanded the scope of the review to include the exhaustion of any part of the quotas and changes in demand for the relevant goods.

On May 13, 2025, TRA published its Statement of Intended Final Determination (the report). This document presents the views of the Republic of Türkiye (“Türkiye”) in accordance with Articles 3.1 and 7.2 of the World Trade Organization (WTO) Agreement on Safeguards (AoS) regarding the TRA’s recommendations in the report.

1. Recommendation on terminating the carry-over mechanism

Article 7.4 of the AoS stipulates that safeguard measures shall be progressively liberalized at regular intervals. However, in the report, TRA recommends removing the carry-over of unused quotas due to alleged pressure and uncertainty in the steel sector. This would effectively reduce quotas and contradict the provisions of the AoS.

TRA states that “in the vast majority of quota allocations, utilisation rates were considerably under 100%, quarter by quarter,” and therefore recommends terminating the carry-over mechanism, although many parties highlighted the logistical benefits of carry-over¹. TRA did not examine these submissions or address the reasoning behind its recommendation. For example, demand for a product may naturally vary throughout the year, but the report includes no review of seasonal fluctuations in UK imports. The carry-over mechanism helps ensure the availability of supply through imports by taking seasonal changes in UK demand into account. Eliminating this mechanism could cause an artificial and abnormal decline in UK imports, to the detriment of users.

Moreover, in the Amended Notice of Initiation, apart from the developing country exceptions, TRA defined the scope of this review as:

- Whether the tariff rate quota, or any part of it, has been exhausted
- A change in demand for the relevant goods

¹ Paragraph 63 and 65 of the Report



However, the report provides no justification for why the proposed change is warranted or how it would affect quota exhaustion or demand levels. In this regard, Türkiye believes that TRA has failed to provide adequate evidence to justify the termination of the carry-over mechanism.

2. Recommendation on removing the access to the residual quota in the final quarter

In its report, TRA recommends that countries with a country-specific quota should no longer have access to the residual quota in the final quarter². However, the report lacks any justification or reasoning for this change. To our knowledge, the public record includes no requests from any party to remove access to the residual quota. TRA simply states that “it has not received persuasive evidence to support countries with a country-specific quota continuing to have access to the residual quota in the final quarter.”

The review mechanism gives an opportunity to investigating authorities to make amendments, when necessary to respond market needs and changes. On the other hand, an amendment should be based on sound evidence and reasoning. The report provides no rationale indicating a need to remove access to the residual quota.

Furthermore, as noted above, it is unclear how the scope of this review encompasses such a change. The report fails to explain why the change is warranted or how it would affect quota exhaustion or demand.

3. Conclusion

Türkiye would like to express its regrets for the intended recommendations of TRA particularly on removing access to the residual quota and carry-over mechanism.

² Paragraph 106 of the Report



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We certainly believe that TRA will take these points and related provisions of AoS and WTO jurisprudence into consideration while taking a decision regarding this review.

Türkiye would like to underline that it closely follows this review as an interested party and Türkiye reserves all its rights stemming from the related WTO Agreements with regard to this proceeding.