

23rd May 2025

Trade Remedies Authority
Premier House
60 Caversham Road
Reading
RG1 7EB

Ref: Tariff Rate Quota Review Case No. TQ0066

In response to the Statement of Intended Final Determination dated 13th May 2025, we can provide the following comments.

Proposed removal of the carry over facility:

Steel supply and demand to the UK does not operate in a linear pattern and steel, like other traded goods, is subject to peaks and troughs influenced by a number of factors. To navigate these trends, it is imperative that the UK operates an import quota system which is flexible and balanced to support a complex supply chain. As many steel import products originate from Asia, lead times to the UK are typically around 8 weeks but are subject to a multitude of factors which can lead to delays such as adverse weather, extended vessel rotation, war disruption, load and discharge port congestion, to name only a few.

We would comment that for product categories with a high import pressure, such as Category 4 where approx. 1m tonnes of material is imported annually, then the removal of the carry over facility reduces flexibility and risks damage to the supply chain of these products to the UK market. The removal of the carry over facility will likely lead to a bottle neck period every quarter where importers try to ensure cargo arrives in time to be cleared in the early part of each quarter. This will likely lead to port congestion, import “surges” and consequent delays in customs clearance which will undoubtedly lead to delays in steel supply to end users and financial penalty for importers.

For product categories with low import pressure, where quotas are smaller and often well underutilised, we can understand the rationale for removal of the carry over facility but for product categories with high import pressure, we believe the risks of disruption to the supply chain far outweigh any perceived advantages.

Implementation of country specific caps on residual quotas, Categories 4, 7 and 13:

Due to the volume of cargo currently on the way to the UK which was booked in early Q1 2025, we welcome the proposed start date of 01st October 2025 for the proposed cap on certain residual quotas.

However, given that a number of the product categories include commodity codes for products, grades or dimensions which are not produced by UK domestic steel mills, such as Quarto Plate

(category 7) over 2100mm wide or Hot Dipped Galvanized Coils (Category 4) over 2mm thickness, we would recommend an increase in caps to 50 – 60% to allow greater flexibility to buyers on imports of these grades/dimensions which can only be sourced on the import market.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'S. Porter', with a stylized flourish at the end.

Steve Porter
Commercial Manager