

Case No. SS0051: Suspension Review – Category 1 steel products**Subject: Steel Safeguard Suspension Review Reassessment****Non-confidential****4 October 2024**

Dear case team,

Our company, Tata Steel UK Ltd (TSUK), is an applicant for the above-mentioned review investigation. We note that on 30 September, the Secretary of State for Business & Trade (SoS) requested the TRA to reassess the Recommendation to suspend the safeguard measure.¹ The SoS referred to the fact that “*the outcome of the TRQ review may mean that a suspension is no longer appropriate*” and therefore requested that they TRA “*reassess whether the circumstances to justify a suspension still exist*”.

With respect to the circumstances justifying a suspension, we note that TSUK had applied for the present suspension review in view of the following two factors:²

- Instability of our upstream assets that were affecting TSUK’s output of hot-rolled flat steel products (HRFS);
- TSUK’s increased demand for HRFS imports to support our downstream assets.

The above-mentioned changes in circumstances were deemed to be of temporary nature as they were supposed to be mitigated by the outcome of the parallel TRQ review (TQ0052).

TRQ review was indeed concluded on 30 September. As a result of the TRQ review, the SoS introduced a new quota system for imports of HRFS whereby the quota for this product category is split into two sub-quotas (1A and 1B). The 1B quota is established specifically for imports of HRFS destined for downstream processing. Therefore, TSUK’s increased demand for HRFS imports to support our downstream assets has been addressed and no longer constitutes a temporary change in circumstances.

As to the instability of TSUK’s upstream assets, TSUK has completed the wind-down of our Blast Furnaces that were negatively affecting the production of HRFS (and therefore our ability to feed downstream assets). TSUK has shifted towards external purchases of slab (i.e. substrate material for the production of HRFS) during the period of our transition

¹ [Letter from Secretary of State_20240930133101.pdf \(trade-remedies-doc-storage-prod-eu-west-2.s3.amazonaws.com\)](#)

² [Category 1 Suspension Review TSUK Non-Confidential Application_20240209104352.pdf \(trade-remedies-doc-storage-prod-eu-west-2.s3.amazonaws.com\)](#)

to EAF-based steelmaking. Therefore, this change of circumstances no longer exists either.

In view of the above, TSUK submits that the circumstances that necessitated the suspension of the measure at the time of the TRA's Recommendation no longer exist. Therefore, we respectfully request the TRA to reassess the initial Recommendation and determine that the safeguard measure for HRFS should not be suspended.