



International Steel Trade Association

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To Whom it may concern

Ref TQ0066 Developing Country Exception Review

We make reference to the amendment which was issued on Friday 21st March by the TRA – Notice of Intention to expand matters to be considered.

The fact that the tariff rate quota, or any part of the quota has been exhausted

We fear that this issue may have been raised in light of recent reviews that the EU are undergoing to safeguarding.

The needs of the UK and Europe are completely different.

Our Government is pushing for Green Steel to be used on all government products. We have no Green Steel manufacture in the UK at the moment outside of Celsa's EAF. TSUK are no longer producing virgin steel. They are importing slabs from all over the world to process in to Hot Rolled coil and they are also importing Hot rolled coil, they have their own distribution chain.

British Steel are producing steel from only one blast furnace and are importing Billets and Blooms in order to re-roll they also have their own distribution chain.

Celsa Steel are producing steel but favour their own downstream fabricators giving an unfair advantage over Independent fabricators.

Independent steel processors and fabricators need a variety of sources to import from – not only in order to buy much needed imported steel competitively but to spread credit risk.

We live in a changing world with ever changing market conditions so importers need the flexibility to import good quality steel from whichever source is most competitive. It is a fact that we have to continue to import steel so we advocate that the carry over system be maintained and that the 4th quarter unutilised residual TRQs remain accessible.

A change in demand for the relevant goods

The current quota system artificially dictates importer's and thus consumer's choice of origin. Safeguarding and other import restrictions along with their constant changes and reviews cause uncertainty in the market which brings about a lack of confidence and may actually be a factor in weak demand.

Importers of reinforcing bars are frustrated at having insufficient access to imports of CARES approved reinforcing bar. The UK demands CARES approved reinforcing bar which brings about it's own restrictions to supply.

Again, our domestic producer does not produce sufficient reinforcing bar to fulfil market requirements and the reinforcing bar that they do produce is mainly supplied to their own fabricators. Independent fabricators have to be in a position to buy Green steel from sources who can competitively and reliably supply and should not be restricted by a safeguarding system using historical data.

According to WTO rules, TRQs should not be reduced and we advocate that the annual increases be upheld and furthermore believe that a non country specific TRQ would maintain import levels but give the ultimate flexibility to source sustainable steel from reliable and competitive worldwide suppliers across all categories.

With regard to the original review, in to developing countries, we understand that if certain developing countries exceed 3% of the total imports of that product, that according to WTO rules, they become liable to lose their quota exemption as a developing nation. However, just because Turkey, Brazil, Vietnam, China and India are large steel producers, surely no consideration should be given to the suggestion that they should not be considered as developing country.

Safeguarding was brought in to protect UK Steel manufacture but we ask the question, who now are we protecting to the detriment of importers, independent fabricators, independent Steel processors, traders and all those associated with the industry who have to rely on imports.

We remain at your disposal,

Yours faithfully

Simone Draper
Director
International Steel Trade Association.