

25th March 2025

Trade Remedies Authority
North Gate House
21-23 Valpy Street
Reading
RG1 1AF

Ref: Tariff Rate Quota Review Case No. TQ0066

Notice of Intention to Expand Matters to be Considered 21st March 2025.

To Whom it May Concern

Salzgitter Mannesmann UK Ltd are a long term established importer of EU and third country steel products to the UK market and write in response to your notice published 21st March 2025.

Limited time for interested parties to respond:

Given the likely significant impact which changes to the UK Steel Safeguard quotas will have on importers throughout the supply chain, we believe there has been insufficient time for interested parties to adequately respond to the TRA's "Notice of Intention to expand matters to be considered" dated 21st March 2025.

Not only has there been insufficient time to respond, there are also no details of proposed changes to the quota system provided by TRA. We propose that the TRA should make clear what the proposed changes are to the UK quota system first, then allow all interested parties sufficient time to provide constructive and considered feedback. Consultation time should be a minimum of 2 weeks rather than 2 working days.

The importance of steel imports to the wider UK industry:

The UK is a net importer of steel and its current domestic production and product portfolio capabilities are not sufficient to meet domestic demand -notably Category 1 Hot Rolled Coil Over 1850mm width.

Our historical EU and third country imports to the UK are based on long-term and well-established supply channels to independent companies in the UK, who rely on diversified third country import supply sources to service their own customers.

This is a supply chain within the UK which employs many thousands of people, and it is imperative that any changes to import quotas do not cause detriment to the many businesses within this chain

who rely on the import availability of steel products -particularly for those reliant on the many products outside of domestic production.

Quotas to be updated to reflect more recent import trade flows:

Some of the current country specific/residual quota allocations we consider are outdated and based on historical trade flows which are no longer relevant. This has led to certain quotas being exhausted whilst others remain consistently underutilised.

For example, Category 4, quota 058107 (Turkey) has very rarely been used in recent years whilst other quotas such as 058106 (India) have often been exhausted in early parts of each quarter. We would propose that quotas for all categories are based on historical imports from a much more recent timeframe than the current structure.

Other countries quotas modified to country specific:

In line with recent proposed changes to EU quotas, there are market expectations that the TRA may add a cap on individual importing countries in certain product categories. We do not believe this would be a good approach to adopt as the UK Other Countries quotas for most product categories are too small to justify a cap on individual importing countries.

Any caps based on a percentage of the overall quota will ultimately most likely remove rather than reduce imports as shipments from many third countries, notably the Far East, require a certain base volume to ship economically to the UK.

As an alternative, we would propose new country specific quotas for individual importing countries to be added based on their import figures of the last 2 – 3 years.

We trust that the TRA will give due consideration to the above points particularly in light of the scant details contained within the notice of 21st March 2025.

Yours faithfully,



Julian Thompson
Managing Director