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Date: 19 May 2025

To:  
Trade Remedies Authority  
Bloom House  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

**Subject: Formal Representation Regarding TRA Case TQ0066 – Proposed Amendments to Category 4 (Cat4) Steel Product Tariff Rate Quotas**

This letter is submitted as a formal representation by Hadley Group in response to the Trade Remedies Authority's Statement of Intended Final Determination under Case TQ0066, issued on the 13<sup>th</sup> May 2025.

The Hadley Group would like to comment on two factors, both of which in relation to Category 4 material (Metallic Coated Sheet) and both having a major impact on the supply into the UK market over the period July 1<sup>st</sup> 2025 to June 30<sup>th</sup> 2026.

- 40% cap on imports coming from individual countries within the residual quota

The Hadley Group still rejects the need for any cap in the residual quota and has concerns that the proposed 40% cap will have a significant impact on supply flexibility, when other countries with country specific quotas (EU, India & Taiwan), do not have material availability.

In terms of increased Tata UK supply, the Hadley Group fully agrees that Tata could supply additional tonnes into the UK, however, if market conditions change significantly, doubts that Tata could fill a shortfall that this change to the residual quota would create.

In addition and based on risk mitigation, downstream Category 4 end users, would always want multiple supply routes and any cap in the residual quota would almost certainly increase the risk of supply failure and this could be substantial if Tata UK had a serious production issue.

- Delay in the introduction of the cap to October 1<sup>st</sup> 2025

If any cap is introduced, the Hadley Group agrees the cap cannot begin on the 1<sup>st</sup> July and must be delayed until the 1<sup>st</sup> October 2025 at the earliest. Even then and based on the percentage of the cap, there will still be some supply issues.

We remain available for any clarification or further engagement.

Yours sincerely,



Andrew Gardner

Director of Procurement – Hadley Group