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15<sup>th</sup> of May 2025

**REF: Application by UK Steel for Review of TRQ Safeguards**

**CASE No: TQ0066**

**Further Ref: Table of BS4449 Steel Producers for Product Groups 13 & 16**

For the Attention of the TRA Investigations Team

Dear Sir/Madam,

Our trade association, the British Independent Rebar Fabricators Association (BIRFA), wishes to provide updated information pertinent to case TQ0066 concerning category 13 products for Rebar/Reinforcement Steel.

**Background and Context**

In a recent meeting with the TRA team at Iron Mongers Hall, London, we highlighted the limited number of Cares-approved Sustainable Steel suppliers and the significant impact this has on the UK market. This issue is particularly pressing given the government's PPN11-16 Sustainable Steel procurement note (<https://www.gov.uk/government/publications/procurement-policy-note-1116-procuring-steel-in-major-projects-revised-guidance>) which mandates increased use of Sustainable Steel in government-backed projects. This note has also been widely adopted by the private sector, making it a critical requirement for major contractors.

In addition to PPN11-16 the private sector contractors ask rebar fabricators to supply materials that hold BES6001 certification, which is a standard for responsible sourcing of construction products, including steel. Cares SCS approval covers most, if not all, of the requirements for steel producers to comply with BES6001, which in turn satisfies our customers' requirements for responsible sourcing.

Some of the top (Not in any order) Construction Companies in the UK – Sustainability Commitments

1. Keir Group – <https://www.kier.co.uk/sustainability/>
2. Mace Group – <https://www.macegroup.com/we-care/sustainability/>
3. Morgan Sindall – <https://www.morgansindall.com/responsible-business>
4. Galliford Try – <https://www.gallifordtry.co.uk/sustainability/>
5. Laing O'Rourke – <https://www.laingorourke.com/supply-chain/supply-chain-sustainability/>
6. Sir Robert McAlpine – <https://www.srm.com/our-commitments/sustainability/>
7. BAM Construction – <https://www.bam.co.uk/what-we-do/sustainability>
8. Vinci Construction – <https://www.vinci-construction-projets.com/en/our-commitments/protect-our-environment/>
9. Balfour Beatty – <https://www.balfourbeatty.com/sustainability/our-sustainability-strategy-building-new-futures/>
10. Graham Construction – <https://www.graham.co.uk/esg/>

These public sustainable commitments are not just for the companies listed above but cascade down through the entire construction industry, especially with respect to steel reinforcement. On top of these sustainable commitments, you also must consider the carbon reduction strategies committed to by most of these companies. As the data shows, we have only a small number of suppliers that can deliver on these commitments.

Furthermore, we expect that steel producers who have already committed to the Sustainable Constructional Steel (SCS) scheme will eventually change their processes to start lowering their CO2e outputs. However, this transformation takes time.

## Data and Analysis

We have compiled an Excel file based on information from the Cares website - (<https://www.carescertification.com/certified-companies/search>) focusing on suppliers within a 2500-mile radius of central Europe, using Italy as the central reference point. This radius includes suppliers from the UK, EU, North Africa, and Turkey, which are regular sources for the UK market. The data considers typical shipment sizes (1,800 to 5,000 tonnes) and lead times (6-8 weeks).

If we consider producers outside of 2,500-mile radius, we will have to consider larger shipments of 15,000 tonnes+ and longer lead times of 3 – 6 months and less likely that we can purchase from Cares SCS producers.

## Key Findings

- **Cares SCS (Sustainable Constructional Steel) producers:**
  - UK: 1 supplier
  - EU: 2 suppliers
  - Other Countries: 2 suppliers
  - Turkey: 9 suppliers (one not a traditional supplier to the UK market)
- **Cares SCS Producers that can produce Low Carbon Steel:**
  - UK: 1 supplier
  - EU: 2 suppliers
- **Cares SCS Producers of Rebar in Spooled Coils (Product Group 16):**
  - UK: 1 supplier
  - EU: 1 supplier
  - Other Countries: 2 suppliers
  - Turkey: 5 suppliers (restricted by a 3,300-tonne quota per quarter)
- **Cares SCS Producers of in Stock Lengths (08mm – 40mm or 50mm):**
  - UK: 1 supplier
  - Other Countries: 2 suppliers
  - Turkey: 7 suppliers (one not a regular UK supplier)

## Important Considerations

- Approval Time for producers to gain Cares SCS (Sustainable Constructional Steel) approval: 12 to 24 months.

- Factors and considerations for Importers:
  - Cares quality approval
  - Cares SCS requirements
  - Low Carbon Steel
  - Material grade and type
  - Lead time
  - Availability of the full range of Rebar in stock lengths 08mm – 40mm/50mm
  - Availability of the full range of Rebar in spooled coils – 08mm – 20mm
  - Quota availability based on that supplier location / quota pool.

## Conclusion

The sustainable supply chain for product group 13 is already highly restrictive, extending to product group 16 for Rebar in Spooled coils. We strongly oppose further restrictions and suggest relaxing quotas for "Other Countries" due to the limited number of Sustainable Suppliers. Restricting quotas will certainly reduce the number of suppliers that we can purchase Rebar group 13 & 16.

The data clearly shows that we also have restrictions on Rebar in Spooled coils, by default there is no other description for this product, it has been accidentally entered into product group 16, with Turkey having just over 3000 tonnes per quarter which is too low to take the risk to ship. Rebar in Spooled coils should be in product group 13 as it has no other final use which is the same as Rebar in Stock Lengths.

Celsa (7 Steel) claim in a recent letter submitted on the 12<sup>th</sup> of May 2025, "***there has been no significant market shift towards coil in recent years. Feedback from across the market indicates that investment in new coil handling equipment has stalled, with most contractors continuing to prefer straight lengths due to logistical and handling constraints. We are equipped to respond to changes in product preference but see no evidence that demand for coil is materially outpacing available supply***".

This is entirely inaccurate, and hopefully they have provided supporting data regarding the feedback they received across the market.

The use of Rebar in Spooled coils, comes down to three factors, design of the project and making efficiencies and cutting down on waste. Rebar in spooled coils are essential for every fabricator and a poll across the BIRFA members indicates an average consumption of Rebar in Spooled coils equates to 30% of their total rebar output, this is very significant.

Maintaining the "Other Countries" quota and reviewing the Rebar in Spooled Coils (16) is crucial for the continuity of supply, especially given the loss of tonnage from Ukraine, Belarus, and Russia. We urge the TRA to consider these points carefully to avoid exacerbating the current supply challenges.

We are available to discuss these points in further detail to ensure a comprehensive understanding of the difficulties faced by our members and the broader construction industry.

Yours sincerely,

**Paul Cardwell**  
Director  
BIRFA Ltd