

9<sup>th</sup> of April 2025

Ref: Tariff Rate Quota Review Case No. TQ0066  
Safeguard measure on certain steel products – 26th March 2025

To Whom it May Concern,

We write on behalf of El Marakby Steel, a leading Egyptian steel producer with an established track record of exporting to the United Kingdom. We are submitting this response following the Trade Remedies Authority's (TRA) *Safeguard measure on certain steel products*, issued on 26th March 2025, as part of its ongoing review of the UK's steel safeguard measures.

#### The Role of Egyptian Steel in the UK Supply Chain

The UK is a **net importer of steel**, and domestic production cannot currently satisfy total demand in which Egypt is a growing and reliable supplier.

As an exporter, El Marakby Steel supports a **well-established and transparent supply relationship with UK buyers**, who rely on consistent imports from Egypt to maintain production and service continuity in key sectors, including construction and infrastructure.

Disruptions to the quota system risk **undermining supply chain stability** and limiting access to competitively priced, high-quality steel that is not fully available from UK production.

#### Quota Allocations Should Reflect Recent Trade Patterns

Several country-specific and residual quotas currently in place are based on outdated trade volumes. This creates distortions, where:

- **Egypt's exports to the UK have increased in 2022**, but current quota allocations do not reflect this growth.

We respectfully propose that:

- The TRA updates TRQ allocations using **trade data from the last 3 years**, ensuring allocations are fair, relevant, and aligned with current trading realities.

#### Office

15 Galal Eldin El Hamamcy  
St., El Mohandessien, Giza,  
Egypt

T: +2 02 330 219 37

F: +2 02 330 21 938

#### Plants

Ext.6<sup>th</sup> Industrial Zone No.184  
6th of October, Egypt

T: +2 02 382 433 04

F: +2 02 382 433 09

[www.elmarkabysteel.net](http://www.elmarkabysteel.net)

**reinforcing life.**

9<sup>th</sup> of April 2025

### Concerns Regarding Potential Country Caps

We are aware of discussions around introducing caps on imports from individual countries. In our view, this would be a **counterproductive step** for several reasons:

- UK "Other Countries" quotas are already **limited in volume** and do not offer sufficient space for viable shipment sizes.
- Caps could **discourage third-country suppliers**, including Egyptian exporters like El Marakby Steel, from serving the UK market due to reduced economic viability of shipments.
- The result would likely be **reduced competition, higher costs, and limited supply diversity** for UK customers.

We suggest an alternative approach:

- Introduce **new country-specific quotas** for nations with consistent export volumes to the UK—such as Egypt—based on recent import data.
- This will ensure a **transparent, stable framework** that benefits both UK importers and trusted export partners.

### Supporting a Low-Carbon Future

We also highlight that restrictive quota changes risk limiting access to **lower-emission steel products**.

**El Marakby Steel is currently Egypt's lowest-emission steel producer**, investing in sustainable production processes aligned with global decarbonization goals.

Fair and balanced market access supports not only trade but also the UK's transition to cleaner supply chains.

In closing, we hope the TRA will consider the above points in its review and recognize the critical contribution of Egyptian steel exports to the UK's market stability and industrial performance.

We remain available for further discussion and engagement on these matters.

sincerely,



Eng. Ramy Saleh

Chief Business Development and Sustainability Officer

#### Office

15 Galal Eldin El Hamamcy  
St., El Mohandessien, Giza,  
Egypt

T: +2 02 330 219 37  
F: +2 02 330 21 938

#### Plants

Ext.6<sup>th</sup> Industrial Zone No.184  
6th of October, Egypt

T: +2 02 382 433 04  
F: +2 02 382 433 09

[www.elmarkabysteel.net](http://www.elmarkabysteel.net)

**reinforcing life.**