



Arab Republic of Egypt

Ministry of Investment and Foreign Trade

Trade Remedies Sector



ISO 9001:2008 CERTIFIED

NON-CONFIDENTIAL - EGYPT'S LEGAL AND TECHNICAL COMMENTS  
ON THE UK TRA STATEMENT OF INTENDED FINAL  
DETERMINATION IN TRQ REVIEW TQ0066

TRADE REMEDIES SECTOR - MINISTRY OF INVESTMENT AND FOREIGN  
TRADE

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## **I. Introduction**

The Ministry of Investment and Foreign Trade represented by the Trade Remedies Sector (TRS) welcomes the opportunity to comment on the Statement of Intended Final Determination published by the UK Trade Remedies Authority (TRA) on 13 May 2025 in the context of the Tariff Rate Quota Review on Developing Country Exceptions (Case No. TQ0066).

Egypt appreciates the transparent process and the opportunity extended to all interested parties to present their views. In this submission, Egypt provides comments concerning the TRA's intended recommendations, particularly with regard to Egypt's position in Category 13 (Rebar).

## **II. Recognition of Egypt's Stable Export Record**

Acting as a stable supplier of the products under the present review throughout the safeguard period, Egypt notes with appreciation that the TRA has maintained Egypt's access to the UK market in all categories, including category 13 through the residual quota.

According to the TRA's own findings in paragraphs 70 and 77 in the statement stating: " *In its submission, the Government of Egypt (and other Egyptian parties) noted that continued access to the UK market for Egyptian exporters was important in Category 13, The TRA notes that Algeria's import share of Category 13 has increased to 86% in the POI and is at a level now which threatens crowding out other countries, including Egypt.*", the fact that demonstrates that, during the Period of Investigation (POI), Egypt accounted for approximately 14% of imports under the residual quota in Category 13 and made full use of its share in each quarter.,

*..... In Category 13, imports in the residual quota come almost exclusively from Algeria and Egypt (86% and 14% respectively). Similar to Category 4, there is*

*therefore a risk that there will be insufficient supply if the country cap were set at 15%. Again, the TRA find that a country cap of 40% is more appropriate for this category to prevent crowding out and import shares to be maintained at a level more similar to recent volumes in this category. “*

For the reasons mentioned above in the statement, and where Egypt has not been granted a country-specific quota due to its historical share during the 2017–2019 representative period, recognizing that the current safeguard measure is due to expire on 30 June 2026, and while respecting the TRA’s methodological framework,

Egypt urges the TRA to rely on the higher and more representative usage figure of **14%**, rather than the 3.3% average listed for Egypt under Annex 4 of the TRA’s Statement of Intended Final Determination, as a benchmark when evaluating Egypt’s performance and considering measures to ensure continued, equitable access for Egyptian exporters.

### **III. Conclusion**

Egypt values its long-standing trade relationship with the United Kingdom and reaffirms its commitment to complying with the safeguard framework. It respectfully invites the TRA to:

- Maintain Egypt’s developing country status in all relevant categories;
- Consider mechanisms to ensure fair and predictable access for Egypt within the residual quota system in all categories, especially category 13;
- Acknowledge the evolution of Egypt’s export performance beyond the 2017–2019 period and support a forward-looking approach.

Egypt remains fully engaged and ready to cooperate in good faith with the TRA to secure a balanced outcome that reflects the principles of fairness, stability, and development.