

**BELMONT & KNOTT LTD
Unit 14C Meadway Court
Rutherford Close
Stevenage
Hertfordshire
SG1 2EF
United Kingdom**

23rd May 2025

To whom it may concern,

Tariff Quota Review – TQ0066

We, Belmont and Knott Ltd, have previously made a submission relating to the Tariff Quota Review – Developing Country Exception Review.

Subsequent to our submission, there has been a document submitted by TATA Steel UK relating to a number of points that we have made. Having reviewed this and for the sake of good order, we believe that we should make the following observations:

- TATA have stated that Aluzinc goods (under tariff heading 7210 61 00 20), although not produced by TATA, compete with products that are produced. This cannot be the case. In general terms, Aluzinc is a more expensive product than the generic Hot Dipped Galvanised products under 7210 49 00 20, with specific end uses. If the end user had the opportunity to substitute with a cheaper product, logically they would do so. Accordingly, there should be no safeguards measures against commodity code 7210 61 00 20.
- The same as above is the case with Aluminised products (7210 69 00 80), which have a very specific heat-resistant related end usage. There is no compatible steel under the 7210 49 00 20 category that can be utilised. Again, the price of this product is substantially higher than normal Hot Dipped Galvanised products in Category 4 so logically it cannot be a substitute and there should be no safeguard measures.
- Large amounts of Zinc-Magnesium materials used for the manufacture of solar panel frames are substantially heavier in thickness than 2mm and require coatings and warranties that are not available from the TATA product “Magizinc”. The expected growth in this area of solar panel manufacturing would be seriously hindered with any restriction of Zinc-Magnesium imports. Accordingly, the availability of imports of this product should not be restricted in any circumstances.
- The vast majority of 2000mm wide Hot Rolled Coil is used in the yellow goods market by important UK companies such as JCB and Caterpillar etc. It is not slit back to size, and in fact we are unclear if any company (other than possible TATA associated companies) actually has the facility to reduce the width of heavy, wide-width HRC. Accordingly, we believe that any HRC over the maximum produceable TATA width should be excluded from any safeguard measures.

- Hot Rolled Plate – Category 7 – the maximum produceable width of the only UK manufacturer is just over 2000mm wide. The main/substantial market for imported HRP is in width 2500mm and 3000mm. There should be no safeguard measures against materials in this area.

We now address the tariff rate quota review of 13th May 2025.

We can see that it has been requested for categories 4, 7 and 13 to have an individual origin 40% import cap. We believe this to be unnecessarily restrictive and counterproductive.

In the case of Category 7 (Quarto Plates), we have previously mentioned that widths above 2050mm are not produced in the UK. Having these wider widths as part of the quota severely restricts availability. Any cap on an approx. 26,000mt quarterly quota is not only inappropriate but also restrictive in so much as shippable quantities from most non-EU origins need many thousands of tonnes per vessel.

In the case of Category 4 (Galvanised), the proposed 40% cap would again cause great restrictions. As mentioned previously, there are too many non-UK produced items under this heading that would leave for example the UK solar panel frame manufacturers short of supply.

We can see that the TRA has recommended implementation of any new measures to commence from October 1st 2025. We reiterate that there are substantial quantities of material due to imminently arrive in the UK and that this should be the absolute earliest date of implementation. Further, along with many other people, we have contractual purchasing commitments in many countries that run to the end of 2025. Any cap would cause us and our downstream manufacturing customers significant issues.

We also believe that the abolition of the quarterly carry-over facility is inappropriate. Many of our goods are imported from far afield with very long delivery times. Many of the UK ports have congestion which in part is caused by the huge TATA purchases of HRC and slabs for their current downstream production. Other issues that need to be recognised as a restricting quarterly factor are bad weather and the fact that most vessels from further afield are stopping in other European ports, potentially causing undefinable delays. Surely the arrival of an annual tonnage quota, whilst divided quarterly, should not be day specific micro-managed.

We trust you will recognise the value of our points above.

Your Sincerely,



Belmont and Knott Ltd