



International Steel Trade Association

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TO THE TRADE REMEDIES AUTHORITY

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REF REVIEW TQ0077

We write with regard to Aluzinc and Aluminised Steel.

We are disappointed by your conclusions and as you would expect, do not agree with them and urge you in the strongest terms to reverse your SIFD and uphold our request for discontinuation of HS Codes 7210610020 and 7210690080 from safeguarding regulations.

We are aware that as with all Trade Reviews, the TRA calls for data for the given period from all registered parties, be they importers, users or producers and will audit that data as necessary. In the case of producers this will be production and delivery data for the period and for the specific products under review.

Will you confirm that you have been provided with such product-specific data by each of the producers in question and have been able to audit same to your satisfaction ?

Aluminised and Aluzinc continue to be treated in exactly the same way as standard hot-dip galvanized products under Category 4. However, in reality, they are not commodity galvanized steels, they are specialised alloy-coated materials with distinct performance characteristics, supplied in comparatively low volumes and at materially higher values per tonne. They serve separate and often highly engineered end use markets. For example, automotive exhaust systems, bakeware, boiler casings and other high-temperature applications in the case of aluminised steel, and specified roofing and cladding systems in the case of Aluzinc. Neither overlap with the mainstream construction applications of standard galvanized material the TSUK can produce. Their continued inclusion within Category 4 therefore has no merit. The crucial point, and what should be the only one that matters, is that neither product is available for any domestic, UK producer despite TSUK's baseless claims, meaning their inclusion within the quota structure does not protect existing UK manufacturing. Instead, it restricts access to material stht UK industry has no alternative but to

import. At a minimum, these clear technical, commercial and supply distinctions justify separate treatment with Category 4.

Referring to point 47 of the SIFD, ISTA's concerns relate to global production reality, not price preference. These origins are leading producers of Aluminised and Aluzinc products, manufactured on dedicated coating lines not present in the UK. For Aluminised coil in particular, the constraint is global production concentration, not price selection. TSUK's general statement of 'low priced origins' is not relevant. We are surprised that such a generalisation can be considered under an investigation which should be based on forensically examined factual evidence.

Under point 51, we would comment that an export declaration provides a customs classification, not equivalence of product. Evidence of export under 7210610020 does not demonstrate domestic production of Aluzinc, or production of a technically equivalent substitute. We ask if you have been presented with executed official orders or offers of this 'equivalent' product domestically?

Aluminised Steel is used for Automotive exhaust systems, heat shields, oven liners, bakeware, boiler casings to name a few. This is because Aluminium Silicon coating provides high temperature oxidation resistance and reflectivity. No zinc based product can replace this. Any claim of 'direct competition' must be supported by evidence of supply in to high temperature applications. Again, we ask if the TRA have received factual evidence that products produced by TSUK have been utilised in exhaust systems, bakeware, heat shields, boiler casings with datasheets proving equivalent performance at >400°C. In absence of such documentation, a claim that TSUK produce a 'directly competitive' product cannot be supported.

Whilst the TRA's SIFD shows total import statistics of category 4, below please find the import figures for the POI for these specific products;

72106100

EU Imports 84mt
China 192 mt
India 357 mt
South Korea 6344 mt
Taiwan 83 mt
Thailand 103 mt
Vietnam 4769 mt
A total for the period of 11,932

72106900

EU Imports 2773 mt
Japan 57 mt
South Korea 15697mt
A total for the period of 18,527 mt

Of the overall TRQs for category 4, these HS codes are extremely niche and should be removed.

Whilst discussing statistics, we note that on the TRA's table number 4 showing TRQ utilisation rates, the actual imports of category 4 during July – September 2025 was

206,944 and not 162,462 mt. Imports from Turkey and imports from Vietnam and Korea which exceeded the TRQ make up the difference.

We are surprised by the TRA's conclusion under point no 66 that the current safeguard measures are sufficiently liberal to allow imports from countries other than the Republic of Korea and Vietnam without the risk of incurring the out of quota safeguarding duty. In fact during the period July – September 2025, some 20,451 mt from Korea and 5,000 mt from Vietnam were over subscribed and importers paid safeguarding duty on these quantities. We do not feel that the TRA are qualified to recommend from where imports should originate when there has clearly been a change in circumstances.

Apart from the categories in question, Category 4 generally includes a range of sizes and grades which are not available for import from the EU.

Section F Conclusion and Recommendation.

Point 85 – The TRA have concluded that there has been a change in circumstances in accordance with regulation 35B9a of the safeguard regulations.

Point 86 – The TRA also found evidence of the TRQs impacting traditional trade flows of category 7 goods. Based on this evidence, they have concluded that there has been a change in circumstance in accordance with regulation 35B9e of the safeguard regulations.

Point 87 – it has been determined that there has been a change in circumstances since the application of the tariff rate quota in accordance with regulation 35b6b of the safeguard regulations.

Point 88 We cannot agree with your conclusion.

There is TRQ for Europe then all other origins have to be imported under the residual quota TRQ which is restricted to 12,839. This quantity could be utilised quite easily each quarter by one importer of Category 4 products putting all importers at risk of the TRQ being exceeded. We find it hard to believe that the TRA can oversimplify in this way and have not given the matter due consideration. The inference seems to be that Importers should buy their material from the EU which we do not feel the TRA are qualified to suggest and as previously mentioned, many grades and sizes of category 4 product are not available from the EU.

Point 89. As the TRQ from the EU is constantly underutilised, contrary to your findings, we would suggest that for Category 4 the residual TRQ should be increased.

There are no like products manufactured in the UK.

We question any statement that TSUK can supply for industries such as exhaust manufacturers, boiler casings, heat shields and bakeware. Therefore there do not produce a 'directly competitive product'.

Without any production of a like product, there can be no injury.

We uphold our request that HS Codes 7210610020 and 7210690080 are removed from safeguarding restrictions.

The safeguard regime is concerned with actual production and competitive supply. Production must be ongoing, commercially viable, supplied in meaningful volumes

and available on reasonable lead times. In absence of these elements, imports cannot be said to compete with domestic production.

Yours faithfully

Simone Draper
Director
ISTA