



NON-CONFIDENTIAL

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Trade Remedies Authority

Subject: TQ0085 – Tariff Rate Quota (TRQ) Review concerning Category 4 Steel Products (Metallic Coated Sheet) from Türkiye: Initial Comments Submission on behalf of TatMetal Çelik Sanayi ve Ticaret A.Ş.

Dear Sir/Madam,

On behalf of TatMetal Çelik Sanayi ve Ticaret A.Ş. (“TatMetal”), and in our capacity as TatMetal’s authorised representative, we hereby submit TatMetal’s initial comments in Review No. TQ0085 concerning Category 4 steel products (metallic coated sheet) from Türkiye, for the consideration of the Trade Remedies Authority in the above-captioned proceeding.

Please do not hesitate to contact the undersigned if you have any questions regarding this submission, or require additional information.

Yours sincerely,

Aykut Yesil

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Submission on behalf of TatMetal Çelik Sanayi ve Ticaret A.Ş.

1. Introduction

This submission is made on behalf of **TatMetal Çelik Sanayi ve Ticaret A.Ş.** (“TatMetal”) in review **TQ0085**, concerning category 4 steel products, namely metallic coated sheet from Türkiye. TatMetal is an overseas producer and exporter of goods falling within the scope of category 4 and has a direct and substantial interest in the outcome of this review (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085: Tariff Rate Quota (TRQ) review of category 4 steel products*, 24 February 2026).

TatMetal respectfully submits that the **Developing Country Exception (“DCE”) applicable to Türkiye for category 4 should be maintained**. The evidence currently on the record does not establish a sustained and structural change in trade patterns sufficient to justify removal of Türkiye’s DCE status. Rather, the material relied upon in the complaint shows a narrow and late-period concentration of customs entries, coupled with significant volatility in total UK imports (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026; Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026).

TatMetal further submits that this review calls for particular caution. The Trade Remedies Authority itself revised its originally proposed outcome within a matter of days after carrying out further analysis of the data. That development confirms that the present review is highly sensitive to methodology, period selection, and data treatment (Trade Remedies Authority, *Note to public file: Tariff Rate Quota (TRQ) Review (TQ0085) on the steel safeguard measure regarding category 4 goods (Metallic coated sheet) – Amendment to proposed final determination*, 3 March 2026).

2. Relief Requested

TatMetal respectfully requests that the Trade Remedies Authority:

- (a) find that the evidence does not justify the removal of Türkiye’s DCE status for category 4;
- (b) maintain the current DCE treatment applicable to Türkiye; and
- (c) in the alternative only, if the TRA remains minded to vary Türkiye’s status, ensure that any such variation is based on a fully verified analysis of the correct period, the correct commodity scope, and the correct HMRC dataset, and is applied only on a prospective and proportionate basis (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026; Trade Remedies Authority, *Note to public file: Tariff Rate Quota (TRQ) Review (TQ0085) on the steel safeguard measure regarding category 4 goods (Metallic coated sheet) – Amendment to proposed final determination*, 3 March 2026).

3. Procedural and Factual Background

On **16 January 2026**, Tata Steel UK Limited submitted a non-confidential request for a review of Türkiye's DCE status in relation to category 4 metallic coated sheet. In that application, Tata Steel alleged that imports from Türkiye exceeded the **3% import-share threshold** and requested that Türkiye's exemption be removed and that Turkish imports be moved into the residual quota (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026).

On **24 February 2026**, the TRA published the **Notice of Initiation** for review TQ0085. In that notice, the TRA stated that its initial analysis supported a proposed final determination under which Türkiye's DCE status would be removed and Turkish imports would be placed into the residual quota for category 4. The Notice of Initiation also made clear that, in this review, the TRA may consider not only the change in circumstances but also the appropriateness of the TRQ for domestic market conditions, the desirability of maintaining traditional trade flows, and any other relevant factors (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085: Tariff Rate Quota (TRQ) review of category 4 steel products*, 24 February 2026).

On **3 March 2026**, the TRA issued a further **Note to public file** stating that its proposed final determination had changed. The TRA explained that, while its analysis still indicated that Turkish imports exceeded the **3% threshold**, further analysis showed that Türkiye exceeded the **5% threshold in the representative period (2017–2019)**. On that basis, the TRA changed its proposed approach from placing Türkiye in the residual quota to recommending a **country-specific quota** instead (Trade Remedies Authority, *Note to public file: Tariff Rate Quota (TRQ) Review (TQ0085) on the steel safeguard measure regarding category 4 goods (Metallic coated sheet) – Amendment to proposed final determination*, 3 March 2026).

This sequence is important. It shows, first, that the present review concerns a **variation within the existing safeguard and tariff-rate quota framework**, not the imposition of a new measure. It shows, second, that the proposed outcome of this review has already changed once following further data analysis. That fact strongly supports a cautious and evidence-based approach before any adverse change is made to Türkiye's current DCE status (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026; Trade Remedies Authority, *Note to public file*, 3 March 2026).

4. Prior Treatment of Türkiye in Category 4

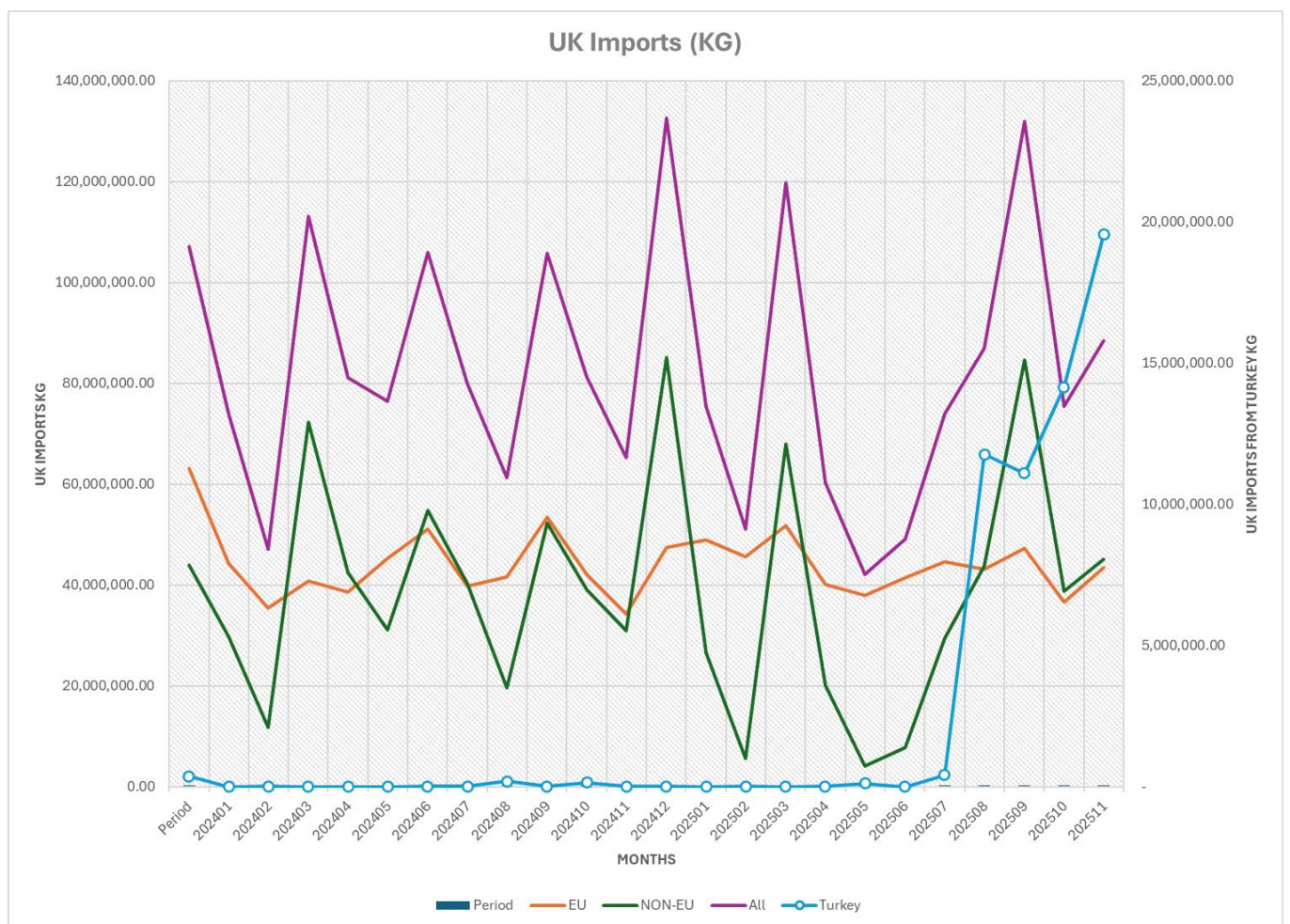
The current review must also be understood against the background of **TQ0066**. In that review, the TRA conducted a Developing Country Exception review. In its **Final determination, TQ0066 – TRQ – Developing Country Exception Review**, issued on **24 June 2025**, the TRA treated Türkiye as **excepted** for category 4 on the basis of the review before it (Trade Remedies Authority, *Final determination, TQ0066 – TRQ – Developing Country Exception Review*, 24 June 2025). That earlier determination matters for two reasons. First, it confirms that Türkiye's position in category 4 was reviewed only recently through a formal and structured process. Second, it means that any attempt to reverse the practical effect of that earlier result should be supported by robust evidence of a genuine and sufficiently established change in circumstances, rather than a short-term fluctuation or a concentrated customs-entry pattern in a narrow part of the year (Trade Remedies Authority, *Final determination, TQ0066 – TRQ – Developing Country Exception Review*, 24 June 2025).

The Complaint Does Not Establish a Sustained Structural Change in Trade Patterns

5. The Complaint Does Not Establish a Sustained Structural Change in Trade Patterns

The central premise of the complaint is that imports from Türkiye increased to such an extent that Türkiye's DCE status for category 4 should now be removed. TatMetal respectfully submits that the complaint does not establish that proposition on the public record. The data relied upon by the applicant does not show a year-round and sustained increase in Turkish imports. It shows a **highly concentrated late-period spike** (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026).

Graph.1 UK Monthly Imports from 2024 January to 2025 November



Source: HM Revenue & Customs (HMRC), UK Trade Info – Overseas Trade Statistics, 2024–2025; Tatmetal's calculations

As shown in Graph 1, the import pattern relied upon in the complaint reveals a highly concentrated late-period spike rather than a sustained year-round increase in imports from Türkiye. The applicant's own table makes this clear. In the period from December 2024 to August 2025, imports from Türkiye are shown at only 537 tonnes in total. The same table then reports 11,775 tonnes in September 2025, 11,063 tonnes in October 2025, and 14,149 tonnes in November 2025.

In other words, virtually all of the Turkish import volume relied upon in the complaint is concentrated in only a very narrow period at the end of the reference window (Tata Steel UK Limited, Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey (Non-confidential), 16 January 2026).

Table 1

Period	EU (KG)	NON-EU (KG)	Turkey (KG)	All (KG)	12 Month % in Total UK Imports	Monthly % Change in All UK Imports
202401	63,076,980.00	43,988,567.00	370,791.00	107,065,547.00		
202402	44,322,464.00	29,713,504.00	-	74,035,968.00		
202403	35,405,508.00	11,787,460.00	19,511.00	47,192,968.00		
202404	40,734,732.00	72,344,836.00	-	113,079,568.00		
202405	38,654,059.00	42,537,475.00	-	81,191,534.00		
202406	45,307,728.00	31,100,214.00	1,066.00	76,407,942.00		
202407	51,118,166.00	54,848,733.00	16,140.00	105,966,899.00		
202408	39,779,408.00	40,257,636.00	16,450.00	80,037,044.00		
202409	41,686,987.00	19,647,969.00	194,296.00	61,334,956.00		
202410	53,432,263.00	52,303,439.00	7,973.00	105,735,702.00		
202411	42,154,623.00	39,068,160.00	148,249.00	81,222,783.00		
202412	34,263,031.00	30,979,104.00	12,006.00	65,242,135.00	0.08%	
202501	47,400,414.00	85,206,295.00	6,145.00	132,606,709.00	0.04%	103.3%
202502	48,876,121.00	26,620,792.00	4,721.00	75,496,913.00	0.04%	-43.1%
202503	45,603,451.00	5,580,782.00	8,008.00	51,184,233.00	0.04%	-32.2%
202504	51,809,268.00	67,995,654.00	1,646.00	119,804,922.00	0.04%	134.1%
202505	40,156,838.00	20,111,080.00	14,176.00	60,267,918.00	0.04%	-49.7%
202506	37,938,381.00	4,188,814.00	117,538.00	42,127,195.00	0.06%	-30.1%
202507	41,374,528.00	7,718,591.00	3,836.00	49,093,119.00	0.06%	16.5%
202508	44,574,965.00	29,446,094.00	415,970.00	74,021,059.00	0.10%	50.8%
202509	43,202,947.00	43,774,338.00	11,775,000.00	86,977,285.00	1.33%	17.5%
202510	47,221,858.00	84,668,488.00	11,096,458.00	131,890,346.00	2.43%	51.6%
202511	36,640,290.00	38,806,583.00	14,150,143.00	75,446,873.00	3.90%	-42.8%

Source: HM Revenue & Customs (HMRC), UK Trade Info – Overseas Trade Statistics, 2024–2025

Moreover, Table 1 presents the underlying dataset from which Figure 1 is derived. The table reproduces the monthly UK import statistics for the relevant product category using data obtained from the HM Revenue & Customs (HMRC) Overseas Trade Statistics database, the same source relied upon by the applicant in its complaint. Unlike the applicant’s presentation, which aggregates several months into a single figure, Table 1 displays the full monthly series and separates UK imports by origin (EU, non-EU and Türkiye) as well as total UK imports for the product concerned. This expanded dataset allows the Authority to observe the broader pattern of fluctuations in UK imports that are not visible in the applicant’s compressed presentation. In particular, Table 1 shows that total UK imports increased sharply by approximately 51.6% between September 2025 and October 2025, before falling by approximately 42.8% between October 2025 and November 2025. These pronounced swings in the overall UK import volume are clearly independent of Turkish export behaviour and are instead driven by broader market dynamics affecting UK imports from all sources.

Consequently, any increase in Türkiye's monthly share during this period must be interpreted in the context of these wider fluctuations in the UK import denominator.

The data therefore confirms that the apparent increase in Türkiye's share is largely the result of volatility in total UK imports rather than evidence of a sustained structural shift in Turkish export behaviour.

This matters. A concentrated increase over a short period is not the same thing as a **sustained structural change in trade patterns**. It may instead reflect shipment timing, customs-entry timing, the implementation of pre-existing contracts, post-measure commercial adjustment, or other short-term factors. The complaint does not sufficiently distinguish between these possibilities. Instead, it moves directly from a short-period increase to the conclusion that Türkiye's DCE status should be removed. TatMetal respectfully submits that this is not a sound basis for such a significant change (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026; Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085: Tariff Rate Quota (TRQ) review of category 4 steel products*, 24 February 2026).

This point is reinforced by exporter-side shipment data available to TatMetal and to Turkish industry participants. That material indicates that there was **no meaningful year-round surge** in exports to the UK in 2025. Rather, the pattern reflects a **late-2025 concentration of shipments**, which is a materially different phenomenon. TatMetal will provide further factual support on this point.

6. Monthly Import Share Movements Are Distorted by Volatility in Total UK Imports

TatMetal further submits that the complaint places significant weight on the evolution of Türkiye's monthly import share without adequately addressing the volatility of total UK imports in the same period. Monthly import-share results can be materially distorted by fluctuations in the denominator, namely the total volume imported into the UK in the relevant month. The data relied upon by the applicant itself shows that total UK imports in category 4 were highly volatile in late 2025 (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026).

Using the figures relied upon in the complaint, total UK imports appear to move from approximately **86,977 tonnes in September 2025** to **131,890 tonnes in October 2025**, before falling to approximately **75,441 tonnes in November 2025**. This means that total UK imports rose by roughly **51.6%** from September to October and then fell by roughly **42.8%** from October to November. By contrast, Turkish import tonnage moved from approximately **11,775 tonnes** to **11,063 tonnes** and then to **14,149 tonnes**. The Turkish tonnage therefore moved far less dramatically than the total UK monthly denominator (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026).

The consequence is obvious. When the denominator moves sharply, the resulting monthly market-share percentage can move sharply even if the exporter's own tonnage remains broadly stable. In such circumstances, a monthly share spike does not, by itself, prove a structural change in supply behaviour. It may instead reflect volatility in total UK imports.

TatMetal respectfully submits that this is precisely what the late-2025 pattern suggests (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026).

This is not merely an abstract statistical point. It goes directly to the legal and economic significance of the evidence. The more volatile the denominator is, the less safe it is to infer long-term structural conclusions from a short monthly sequence. Where the claimed exceedance is driven by a narrow and volatile period, caution is required before removing an existing DCE status.

7. The Complaint’s Presentation Magnifies the Appearance of a “Shock”

TatMetal also submits that the manner in which the complaint presents the data tends to magnify the appearance of a dramatic shock. The complaint groups **December 2024 to August 2025** into a single line and then disaggregates **September, October, and November 2025** individually (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026).

That presentation choice is not neutral. It visually frames the issue as a jump from **537 tonnes** to **11,775 tonnes** in a single step. However, that framing does not reflect a true year-round analytical picture. It compresses the first nine months into one block and disaggregates only the final three months. As a result, it emphasises the apparent late-period surge while obscuring the volatility in total UK imports and the concentration of customs entries in the final part of the year (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026).

TatMetal does not suggest that the applicant was not entitled to present its data in this way. The point is narrower. The TRA should not mistake a visually dramatic presentation for proof of a durable and structural shift in trade flows. The real question is whether the evidence shows a sufficiently established and representative change in circumstances to justify changing Türkiye’s treatment under the safeguard regime. TatMetal respectfully submits that the public record does not presently support such a conclusion (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085: Tariff Rate Quota (TRQ) review of category 4 steel products*, 24 February 2026).

8. The TRA’s Own Prior Practice Supports Caution Where Intra-Year Fluctuations Are Material

The TRA’s own prior practice supports a cautious approach in circumstances such as these. In **Tariff Rate Quota Review of Developing Country Exception, Case TQ0030: Recommendation to the Secretary of State**, the TRA explained that analysis over a full **12-month period** helps it establish an understanding of trade patterns and **eliminates decisions based on fluctuations throughout the year**. The TRA there also explained that using only a short subset of the year would risk failing to capture trade flows after the relevant quota changes had taken effect (Trade Remedies Authority, *Tariff Rate Quota Review of Developing Country Exception, Case TQ0030: Recommendation to the Secretary of State*, 17 April 2023, paras. 23–25).

That principle is directly relevant here. The present complaint invites the TRA to draw a strong structural conclusion from a highly concentrated late-period customs-entry pattern. Yet the TRA has previously recognised that annual analysis is important precisely because intra-year fluctuations can be misleading. TatMetal therefore respectfully submits that the present review should not be determined by reference to a narrow and volatile customs-entry window without rigorous verification of whether that pattern is representative, sustained, and truly structural (Trade Remedies Authority, *Tariff Rate Quota Review of Developing Country Exception, Case TQ0030: Recommendation to the Secretary of State*, 17 April 2023, paras. 23–25).

The same caution is supported by the recent procedural history of this very review. In the **Notice of Initiation** issued on **24 February 2026**, the TRA's proposed final determination was to remove Türkiye's DCE status and place Turkish imports into the residual quota. Only days later, in its **Note to public file** dated **3 March 2026**, the TRA revised that proposed outcome and instead proposed a **country-specific quota**, following further analysis of the data (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085: Tariff Rate Quota (TRQ) review of category 4 steel products*, 24 February 2026; Trade Remedies Authority, *Note to public file: Tariff Rate Quota (TRQ) Review (TQ0085) on the steel safeguard measure regarding category 4 goods (Metallic coated sheet) – Amendment to proposed final determination*, 3 March 2026).

This is significant. It demonstrates that the outcome of this review is highly sensitive to data treatment and methodology. It also confirms that the public record is not as straightforward as the complaint suggests. Where the proposed outcome of the review itself changed within a matter of days, that is a strong reason for the TRA to proceed with care and not to infer more from a short-period spike than the evidence can properly bear (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026; Trade Remedies Authority, *Note to public file*, 3 March 2026).

9. Timing Effects, Shipment Clustering, and Customs Entry Lag Must Be Properly Considered

TatMetal also submits that the TRA should pay close attention to timing effects. Import data recorded at the point of UK customs entry does not necessarily correspond to the date on which contracts were concluded, the date on which goods were produced, or even the date on which the goods physically departed the exporter's country. There may be a material lag between shipment and customs entry.

This issue is not theoretical. A comparison between exporter-side shipment timing and the monthly import pattern relied upon in the complaint suggests that customs-entry timing may materially affect the apparent monthly profile. A shipment concentrated in late summer may appear in UK import statistics in early autumn. A set of contracts concluded before a market slowdown may still arrive in the UK after total imports have fallen, thereby mechanically increasing the exporter's monthly share. Such effects do not establish a structural reorientation of trade. They are timing effects.

The need for care is also consistent with prior TRA practice in **Review of Tariff Rate Quota on certain steel products, Case SM0015**, where the TRA expressly recognised that the relevant HMRC dataset may differ depending on whether one uses **country of dispatch** or an adapted dataset incorporating **country of origin** for non-EU imports. In that review, the TRA stated that, although differences are often small, some TRQ allocations changed as a result.

It noted specifically that, for **Turkey in product category 4**, country-of-dispatch data led to one result whereas use of the country-of-origin dataset meant that Turkey's average import share from **2017 to 2019** was above **5%**, such that Turkey should have had a **country-specific allocation** (Trade Remedies Authority, *Review of Tariff Rate Quota on certain steel products, Case SM0015*, paras. 38–42).

This is not a peripheral issue. It goes directly to the reliability of the proposed determination in the present review. Before drawing any adverse conclusion from the late-2025 pattern, the TRA should verify whether the monthly profile reflects underlying trade behaviour or simply customs-entry timing and data treatment choices (Trade Remedies Authority, *Review of Tariff Rate Quota on certain steel products, Case SM0015*, paras. 38–42).

Verification, Consistency, Proportionality, and Alternative Position

10. The TRA Should Verify the Correct Period, Scope, Dataset, and Country Attribution Before Reaching a Final Adverse Conclusion

TatMetal respectfully submits that no final adverse conclusion should be reached unless the Trade Remedies Authority has first verified, and clearly explained, the precise data and methodology used to support any finding that Türkiye no longer qualifies for the Developing Country Exception in category 4. That verification should include, at a minimum, the correct review period, the correct commodity scope, the correct HMRC dataset, and the correct country attribution method (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085: Tariff Rate Quota (TRQ) review of category 4 steel products*, 24 February 2026; Trade Remedies Authority, *Note to public file: Tariff Rate Quota (TRQ) Review (TQ0085) on the steel safeguard measure regarding category 4 goods (Metallic coated sheet) – Amendment to proposed final determination*, 3 March 2026; Trade Remedies Authority, *Review of Tariff Rate Quota on certain steel products, Case SM0015: Recommendation to the Secretary of State*).

First, the Authority should ensure that the analysis is aligned with the review's own procedural framework. The **Notice of Initiation** identifies the **Period of Investigation as 1 January 2025 to 31 December 2025**. By contrast, the complaint relies on a rolling period running from **December 2024 to November 2025**. The Authority may, of course, consider data from different windows where justified. However, if the final conclusion is to remove Türkiye's DCE status, the Authority should clearly explain why the operative analysis relies on the chosen period and how that period is consistent with the review as initiated (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026; Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026).

Second, the Authority should ensure that the calculation is confined to the correct goods and the correct category 4 commodity codes. This review is limited to **category 4 steel products – metallic coated sheet** and the specific commodity codes listed in the Notice of Initiation and registration materials. Any inclusion of out-of-scope goods, miscoded entries, or movements falling outside the defined product category would distort the import-share analysis and would be particularly problematic in a review where the outcome turns on a threshold-based test (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026).

Third, the Authority should verify whether the monthly pattern relied upon in the complaint is materially affected by the distinction between **shipment timing** and **customs-entry timing**. As explained above, the narrow late-2025 spike appears capable of being influenced by timing effects. Those effects should not be mistaken for evidence of a durable and year-round shift in trade behaviour.

Fourth, the Authority should also confirm whether the relevant analysis is based on the most appropriate country attribution methodology. In **Review of Tariff Rate Quota on certain steel products, Case SM0015**, the TRA expressly recognised that the choice between **country of dispatch** data and an adapted dataset incorporating **country of origin** can change TRQ allocation outcomes. The TRA noted specifically that, for **Turkey in product category 4**, country-of-dispatch data led to one result, whereas the country-of-origin dataset showed that Turkey's average import share from **2017 to 2019** was above **5%**, such that Turkey should have had a **country-specific allocation** (Trade Remedies Authority, *Review of Tariff Rate Quota on certain steel products, Case SM0015: Recommendation to the Secretary of State*, paras. 38–42).

For all of these reasons, TatMetal respectfully submits that the complaint's figures should not be treated as self-proving. The data must be fully tested before a conclusion is reached that would materially alter Türkiye's access to the UK market.

11. The Present Review Should Be Considered Consistently with the TRA's Prior DCE Practice

TatMetal further submits that the present review should be approached consistently with the TRA's own earlier DCE practice. In **Final determination, TQ0066 – TRQ – Developing Country Exception Review**, issued on **24 June 2025**, the TRA set out the legal framework of **regulation 43**, including the rule that a developing country remains excepted where its individual share of total imports does not exceed **3%** and the collective share does not exceed **9%**. The TRA also explained that the review concerned whether there had been a change of circumstances since the application of the TRQ and that the relevant review had been initiated on **28 February 2025**. (Trade Remedies Authority, *Final determination, TQ0066 – TRQ – Developing Country Exception Review*, 24 June 2025).

That earlier determination is important for present purposes. It confirms that Türkiye's treatment in category 4 was reviewed only recently through a formal and structured process. It also confirms that the DCE analysis is intended to be based on a disciplined review of trade data, not on impressionistic readings of a narrow and volatile sub-period. In those circumstances, the present review should not lightly infer that a recent and highly concentrated late-period spike is enough to reverse the practical effect of that earlier review (Trade Remedies Authority, *Final determination, TQ0066 – TRQ – Developing Country Exception Review*, 24 June 2025; Trade Remedies Authority, *Tariff Rate Quota Review of Developing Country Exception, Case TQ0030: Recommendation to the Secretary of State*, 17 April 2023).

That conclusion is reinforced by the TRA's own reasoning in **TQ0030**, where the Authority stated that analysis over a full twelve-month period helps it understand trade patterns and avoids decisions based on **"fluctuations throughout the year."** The TRA also explained there that relying only on a limited part of the year would fail to capture developments after quota changes had taken effect (Trade Remedies Authority, *Tariff Rate Quota Review of Developing Country Exception, Case TQ0030: Recommendation to the Secretary of State*, 17 April 2023, para. 25).

TatMetal does not suggest that the Authority is legally prevented from varying a country's status following a later review. The point is narrower and more important. Where the Authority has only recently conducted a DCE review and the new complaint relies on a short and volatile period, the evidential burden should be approached with discipline and care. The fact that the Authority itself revised its own proposed final determination within days confirms that the present case is methodologically sensitive and should not be determined on the basis of an oversimplified reading of late-2025 data (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026; Trade Remedies Authority, *Note to public file*, 3 March 2026).

12. Traditional Trade Flows, Domestic Market Conditions, and Proportionality Support Maintaining Türkiye's DCE Status

The Authority's own review framework confirms that this case is not solely about whether a threshold has been crossed in a mechanical sense. In the **Notice of Initiation**, the Authority expressly stated that, as part of the review, it may consider whether the amount or allocation of the TRQ is appropriate for domestic market conditions, the desirability of maintaining traditional trade flows, and any other relevant factors (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026).

TatMetal respectfully submits that each of those considerations supports caution in the present case. First, the evidence does not show a stable and sustained year-round pattern of increased Turkish penetration into the UK market. It shows a concentrated late-period increase. Such a pattern is not a sound basis for disrupting established commercial arrangements and established sourcing relationships.

Second, UK downstream users and importers benefit from continuity and predictability in supply. The safeguard framework exists to address serious injury concerns, but the Authority has repeatedly recognised that TRQs are also intended to preserve, as far as possible, **traditional trade flows**. In **TQ0030**, the Authority recorded that representative periods and allocation design should be approached with that objective in mind (Trade Remedies Authority, *Tariff Rate Quota Review of Developing Country Exception, Case TQ0030: Recommendation to the Secretary of State*, 17 April 2023).

Third, proportionality matters. The applicant seeks to attribute serious consequences to a narrow period of increased Turkish imports. Yet the public complaint does not provide a sufficiently transparent causal analysis showing that the late-2025 entries, rather than wider market developments or the applicant's own circumstances, justify a change to Türkiye's treatment under the measure. TatMetal respectfully submits that the Authority should be careful not to adopt a disproportionate result on the basis of an incomplete public causal record (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026).

13. Alternative Position Only if the Authority Remains Minded to Vary Türkiye's Status

TatMetal's primary position is clear. Türkiye's DCE status for category 4 should be maintained.

However, if the Authority nevertheless remains minded to recommend a variation, TatMetal submits that any such variation must be strictly limited, fully reasoned, and prospective only.

First, following the Authority's **3 March 2026 Note to public file**, the only permissible direction under the Authority's own current reasoning would be a **country-specific quota**, not placement into the residual quota. The Authority has already recognised that its initial proposed approach required revision following further data analysis. TatMetal therefore submits that the residual-quota approach proposed in the original complaint should be rejected (Trade Remedies Authority, *Note to public file: Tariff Rate Quota (TRQ) Review (TQ0085) on the steel safeguard measure regarding category 4 goods (Metallic coated sheet) – Amendment to proposed final determination*, 3 March 2026).

Second, any variation should apply **prospectively only**. In **Review of Tariff Rate Quota allocations for the Russian Federation and the Republic of Belarus, Case SM0019: Recommendation to the Secretary of State**, the TRA expressly stated: **"We do not recommend retroactive application of varied TRQs."** That principle is highly relevant here. Where exporters, importers, and downstream customers may already have acted on the basis of the legal framework in force, a retrospective or quasi-retrospective change would create unnecessary disruption and would be inconsistent with fair administration (Trade Remedies Authority, *Review of Tariff Rate Quota allocations for the Russian Federation and the Republic of Belarus, Case SM0019: Recommendation to the Secretary of State*, para. 82).

Third, if any variation is made, the Authority should ensure that the transition respects existing commercial realities. Supply contracts, production planning, shipment scheduling, and customs processing do not operate on a purely monthly policy cycle. The review should therefore avoid creating unnecessary disruption to contracts and shipments already arranged in reliance on the then-applicable treatment of Türkiye.

Fourth, if the Authority proceeds to a country-specific quota, the level and administration of that quota should be fully explained, and the Authority should state clearly why the selected level is appropriate in light of the review record, the representative period used for this purpose, and the objective of preserving traditional trade flows as far as possible (Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026; Trade Remedies Authority, *Note to public file*, 3 March 2026; Trade Remedies Authority, *Tariff Rate Quota Review of Developing Country Exception, Case TQ0030: Recommendation to the Secretary of State*, 17 April 2023).

14. Conclusion

For the reasons set out above, TatMetal respectfully submits that the record in this review does **not** justify the removal of Türkiye's Developing Country Exception for category 4. The complaint does not establish a sustained structural change in trade patterns. It shows, rather, a narrow late-2025 concentration of customs entries, against a background of substantial volatility in total UK imports and unresolved issues concerning timing, period selection, scope, and dataset treatment (Tata Steel UK Limited, *Application for a tariff-rate quota review (review of developing country exemption) – imports of metallic coated sheet (product category 4) from Turkey* (Non-confidential), 16 January 2026; Trade Remedies Authority, *Notice of Initiation, Review No. TQ0085*, 24 February 2026; Trade Remedies Authority, *Tariff Rate Quota Review of Developing Country Exception, Case TQ0030: Recommendation to the Secretary of State*, 17 April 2023; Trade Remedies Authority, *Review of Tariff Rate Quota on certain steel products, Case SM0015: Recommendation to the Secretary of State*).

TatMetal therefore respectfully requests that the Authority maintain Türkiye's current DCE treatment for category 4.

In the alternative only, if the Authority remains minded to recommend a variation, TatMetal requests that any such variation be limited to a country-specific quota, be fully reasoned, be applied prospectively only, and be implemented in a manner that avoids unnecessary disruption to established trade flows and existing commercial arrangements (Trade Remedies Authority, *Note to public file*, 3 March 2026; Trade Remedies Authority, *Review of Tariff Rate Quota allocations for the Russian Federation and the Republic of Belarus, Case SM0019: Recommendation to the Secretary of State*, para. 82).

TatMetal remains willing to provide further factual material, including company-specific shipment information and supporting trade data, should the Authority consider that such material would assist its review.