

Subject: TQ0077 – Tata Steel UK’s comments on the Statement of Intended Final Determination**Non-confidential****18 February 2026**

Dear case team,

Tata Steel UK Limited (“TSUK”) welcomes the opportunity to comment on the TRA’s Statement of Intended Final Determination in the above-referenced review. TSUK supports the TRA’s intended decision not to introduce product exclusions from the safeguard tariff-rate quotas applicable to Categories 4 and 7.

1. Domestic production and competitive relationship

The TRA has correctly established that goods falling within the scope of the requested exclusions are either produced in the United Kingdom or are directly competitive with UK-produced goods.

As explained in TSUK’s registration submission:

- TSUK manufactures products within Category 4 under commodity code 7210610020 and produces directly competitive metallic-coated steels.
- TSUK manufactures multiple Category 7 quarto plate products and has the technical capability to manufacture the remaining requested code parameters.

The safeguard framework does not require identical product matching; rather, it protects the domestic industry producing like or directly competitive goods. Imported coated steels and wide plate products compete with TSUK material across shared applications including construction, shipbuilding and heavy engineering.

Accordingly, removing these products from the safeguard would undermine the measure’s purpose by excluding products that compete directly with domestic production.

2. Risk of serious injury

TSUK agrees with the TRA’s assessment that exclusions would create a material risk of serious injury to the UK steel industry.

Removal of the safeguard protection would predictably result in:

- increased import volumes,
- price suppression and undercutting,
- substitution away from domestically produced steel.

As previously explained, expanded supply would reduce existing price premiums and enable imports to displace TSUK sales across overlapping product segments.

These effects would operate simultaneously and would inevitably harm the domestic industry.

3. Quota availability and market access

The evidence demonstrates that the current TRQ regime does not restrict supply to the UK market. Substantial quota volumes remain available across multiple origins. The applicants' concerns relate primarily to sourcing preferences for specific low-priced countries rather than an inability to obtain material.

Consequently, exclusions are not necessary to ensure supply and would instead selectively advantage certain import sources at the expense of the domestic industry.

4. Consistency with safeguard principles

Safeguard measures exist to address injury caused by imports of goods that compete with domestic production. Excluding products merely because they differ in certain specifications would be inconsistent with the established interpretation of "like or directly competitive goods" and would materially weaken the effectiveness of the measure.

The TRA's reasoning therefore properly reflects both the legal framework and market reality.

5. Conclusion

For the reasons above, TSUK supports the TRA's intended determination:

- UK producers manufacture the goods or directly competitive goods;
- removal would risk serious injury;
- quota access remains adequate for downstream users.

TSUK therefore respectfully requests that the TRA confirm its intended decision and maintain the safeguard measures for Categories 4 and 7 without exclusions.