



Registration Form

Suspension Review – Category 1 steel products

Case No. SS0051

Period of Investigation:	<input type="text" value="N/A"/>
Deadline for response:	<input type="text" value="25 February 2024"/>
Case Team Contact:	<input type="text" value="SS0051@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="KROMAT TRADING LIMITED."/>
Party type (select):	<input type="checkbox"/> UK producer of Category 1 steel products <input checked="" type="checkbox"/> Other

When you have completed this form, indicate the **confidentiality** status of this document by placing an X in the relevant box below and in the header. We strongly recommend this questionnaire to be completed on the computer, so this step is easy to complete:

- Confidential
 Non-Confidential – may be made publicly available

Parties providing confidential information should also provide a non-confidential summary of that information or a statement of reasons why it cannot be summarised. Both copies must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **25 February 2024**.



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Suspension review

The review will consider:

- Whether the market conditions have changed temporarily;
- Whether serious injury caused to the UK producers is unlikely to recur if the application of the safeguarding remedy were to be suspended;
- Whether the suspension is appropriate; and
- The appropriate length of any suspension.

Relevant measure

The review will consider whether it is appropriate to suspend the safeguarding remedy on Category 1 steel products, following the measure imposed as a result of the reconsideration of the transition review TF0006 from 1 July 2022, the SM0016 Tariff-Rate Quota (TRQ) review from 1 July 2022, the SM0019 TRQ review from 1 July 2022, and TQ0030 TRQ review from 30 June 2023. Details of the measure imposed are set out in:

- [Trade Remedies Notice 2022/01: Safeguard Measure: Tariff-Rate Quota on steels goods](#); and
- [Trade Remedies Notice 2023/10: Safeguard Measure: Tariff-Rate Quota on steels goods](#).

Goods subject to review

The goods subject to review are: Category 1 steel - non-alloy and other alloy hot rolled sheets and strips.

The goods subject to review are subject to the following tariff classifications:

72081000, 72082500, 72082600, 72082700, 72083600, 72083700, 72083800, 72083900, 72084000, 72085210, 72085299, 72085310, 72085390, 72085400, 72111300, 72111400, 72111900, 72126000, 72251910, 72253010, 72253030, 72253090, 72254015, 72254090, 72261910, 72269120, 72269191, 72269199

For more information about this case, you may refer to the Notice of Initiation published at: www.trade-remedies.service.gov.uk/public/cases.



Instructions

I – Who should complete this form

You should complete this form if you wish to comment on the proposed suspension.

II – Note about confidentiality

Anyone requesting that information be treated as confidential should provide a non-confidential summary of that information or a statement of reasons why it cannot be summarised.

Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures.

All information provided to the Trade Remedies Authority (TRA) in confidence will be treated accordingly, only used for this review, and will be stored in protected systems.

The non-confidential version of your submission may be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.



Section A – Your organisation’s interest in the review

To register your organisation’s interest in this suspension review, please complete the text boxes below.

A1. Please describe your interest in this suspension review:

WE ARE LONG-STANDING IMPORTERS OF WIDE FLATS TARIFF 72111300. THE EXCEPTIONAL PRESSURES ON THE OTHER COUNTRIES QUOTA SINCE SUMMER 2023, HAVE SERIOUSLY COMPROMISED THIS BUSINESS.

Section B – Comments on the proposed suspension

The TRA is considering suspending the application of the safeguarding remedy on Category 1 steel products.

During this suspension review, the TRA will consider whether market conditions have temporarily changed. We will assess whether, as a consequence of the change in market conditions, serious injury to UK producers would be likely to recur if the measure were suspended.

Before making its recommendation, the TRA must give UK producers the opportunity to comment on the proposed suspension.

Therefore, we invite comment and evidence on the following considerations:

B1. Change in market conditions

Market conditions have changed because the only known UK producer of Category 1 steel products, TATA Steel UK, is undertaking a technical reconfiguration of its business. During this reconfiguration, the applicant highlighted that domestic production and supply of the goods subject to review will be limited and that it intends to import the goods subject to review to maintain downstream operations. The reduction in the UK production of Category 1 steel products has resulted in a change in market conditions.



Please provide any comments on the described change in market conditions that you consider relevant for the TRA to take into consideration during the suspension review:

MARKET CONDITIONS CHANGED FROM SUMMER 2023 – ALREADY NINE MONTHS AGO - WHEN THE APPLICANT'S PRODUCTION PROBLEMS CAUSED THEM TO UTILISE THE OTHER COUNTRIES IMPORT QUOTA. IT IS CLEAR THAT A TECHNICAL RECONFIGURATION WILL HAVE A LONGER AND GREATER EFFECT THAN BASIC PRODUCTION PROBLEMS.

B2. Temporary nature of the change

This change is of a temporary nature because the UK producer is undergoing a technical reconfiguration in order to complete its decarbonisation process, and has stated that it intends to resume production of Category 1 steel products once completed. Additionally, alongside this suspension review, the TRA is initiating a TRQ review to consider medium-longer term solutions and consider this proposed suspension to be a stop-gap.

Please provide any comments on the described temporary nature of this change in market conditions that you consider relevant for the TRA to take into consideration during the suspension review:

HOW DO YOU DEFINE 'TEMPORARY' ? THIS SITUATION HAS ALREADY BEEN GOING ON FOR SOME NINE MONTHS, AND IT IS NOT CLEAR HOW LONG THE TECHNICAL RECONFIGURATION WILL LAST, NOR WHETHER IT WILL END WITH IMPORTED SLAB BEING CONVERTED TO HRC OR WHETHER HRC WILL CONTINUE TO BE IMPORTED TO COVER THE PERIOD OF THAT RECONFIGURATION.

B3. Effect on the UK industry as a result of the temporary change in market conditions

The UK industry is likely to see an increase in the cost of Category 1 steel products, as a result of the change in market conditions. Given the current domestic consumption of these goods, it is likely the current TRQ residual quota will be fully utilised, resulting in the application of the 25% safeguarding remedy on all additional imports of the goods subject to review.



Please provide any comments on the described effect on UK industry as a result of the temporary change in market conditions that you consider relevant for the TRA to take into consideration during the suspension review:

THIS IS NOT JUST A COST ISSUE, BUT ALSO ONE OF SUPPLY. THE OVER-UTILISATION OF THE OTHER COUNTRIES QUOTA HAS BEEN GOING ON FOR SOME NINE MONTHS, AND OUR COMPANY CANNOT AFFORD THE RISK OF INCURRING A 25% PENAL DUTY AND NOR COULD OUR CUSTOMERS. OTHER IMPORTERS HAVE ALSO CUT BACK FOR SAME REASON.

B4. Serious Injury to UK Producers

Serious injury to UK producers may be unlikely to recur if the application of the safeguarding remedy were to be suspended. The only known UK producer of these products has requested the suspension, and while we are aware of other facilities in the UK that are able to produce the goods subject to review, we have seen no evidence that this is likely to occur in the proposed suspension period.

Please provide any comments that you consider relevant for the TRA to take into consideration to assess whether serious injury would be likely to recur, if the safeguarding remedy on Category 1 steel products were to be suspended as a result of the temporary changes to market conditions described above:

SPEAKING FOR OUR OWN COMPANY, SUSPENSION OF THE QUOTA WOULD SIMPLY GIVE US THE CHANCE TO RESUME 'BUSINESS AS NORMAL'. THE MARKET IN GENERAL SHOULD BE MORE STABLE WITHOUT THE DISTORTION AND UNCERTAINTY CREATED BY THE EXISTING QUOTA UTILISATION, AND THE APPLICANT WILL BENEFIT FROM HAVING A COMPETITIVE SOURCE FROM ITS PARENT COMPANY.

Section C – Additional information

C1. Please use the box to provide information about anything else you consider relevant to this suspension review:

DOWNSTREAM USERS SUCH AS COIL PROCESSORS AND TUBE MAKERS WILL BENEFIT FROM BEING ABLE TO PLAN AND REGULATE THEIR RAW MATERIAL SUPPLY, FREE FROM THE WORRY OF QUOTA UTILISATION AND SUBSEQUENT COST RISK. SUSPENSION SHOULD NOT BE USED BY THE APPLICANT TO IMPORT HRC WHICH THEY DO NOT MANUFACTURE THEMSELVES, SUCH AS 2 METRE WIDE COIL.