



## 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="Click or tap here to enter text."/>
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](http://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](http://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](http://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:

To provide Stemcor’s opinion on the “Suspension Review” concerning “Category 1 steel products

Stemcor Distribution Limited is an importer and distributor of category 1 steel products in the UK.

We purchase the products under review from non-EU producers, acting as an intermediary between supplier and customer.

We then organise finance, shipment, custom clearance, breakbulk and inland transportation of the material to the customers’ desired delivery location.

## 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:

TATA Steel UK, the only British producer of Category 1 Steel products, have recently announced they intend to temporarily halt production of the aforementioned products as they transition from Blast Furnace production of steel to Electric Arc Furnace production. During this reconfiguration, TATA have advised they instead intend to import the goods subject to review, in order to maintain their downstream operations. The closure of their blast furnaces and the subsequent reduction in steel they can produce, will profoundly change current market conditions.

## 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:

Due to this technical reconfiguration, TATA UK will not be able to adequately supply the demands of the UK market with their own locally produced material. Subsequently, they will have to import Hot Rolled Coil from their parent company in India in order to meet demand both for HRC as well as other flat rolled products made using this substrate (Cold reduced steel under category 2 and coated steel under category 4)

If the safeguarding measures are not suspended, then importers will increasingly have to pay an additional 25% for the large majority of their imports as quota volumes are routinely exceeded. This will have a negative impact to all those downstream, from service centres to end users and ultimately, to the consumer.

Bearing in mind there may be a time-lag of two to three months between contract date and delivery, uncertainty as to whether or not import duty will be levied may discourage imports at a time when there is likely to be insufficient steel to meet demand.



### **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:

If safeguarding measures are not suspended, then the UK industry is likely to see an increase in the cost of goods subject to review. Based on current domestic consumption and the fact TATA will have to import these products, it is all but certain that the current TRQ residual quota will be fully utilised every quarter resulting in the application of the 25% safeguarding duty on all additional imports.

### **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:

We fail to see how “serious injury” could occur if the only known producer are not producing steel.

It is in the overall interest of UK manufacturing to be able to import competitively priced steel from abroad.



## Section C – Additional information

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

If the UK is not producing the steel under the scope of this review, then no injury to domestic mills can occur. Consequently, safeguarding measures should be suspended and a review into the suspension of anti-dumping cases against China should also take place. How can Chinese imports represent a danger to the UK steel industry if there is no such industry exists (in the short-term at least)?

A review into SE0041 should also take place as TATA's ability to produce products under Category 2 and 4 will also be severely impacted