



Registration Form
Tariff Rate Quota (TRQ) Review
Case No. TQ0077

Period of Investigation: 1 October 2024 – 30 September 2025

Deadline for response: 25th January 2026

Case Team Contact: TQ0077@traderemedies.gov.uk

Completed on behalf of: Tata Steel UK

Party type (select most relevant party types):

- Government of a foreign country or territory
- Overseas exporter of the goods subject to review
- Importer of the goods subject to review
- UK Producer of the like goods or directly competitive goods
- Trade or business association of the like goods, directly competitive goods, or goods subject to review
- Overseas producer of the goods subject to review
- Other (contributor)

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 – will 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 January 2026**.



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TRQ review

Under regulation 35B(1) of the Regulations, the TRA may conduct a review to consider whether a tariff rate quota (TRQ) to which the goods are subject should be varied or revoked where it is satisfied that there is sufficient information indicating that there may have been a change of circumstances since the application of that TRQ to those goods. As part of the review, the TRA may consider:

- Whether the amount or allocation of the TRQ is appropriate for domestic market conditions;
- The desirability of maintaining, as far as possible, traditional trade flows;
- Any other factors that it considers relevant.

Change in circumstances

The TRA will review trade data on Categories 4 and 7 to determine if there has been a change of circumstances which corresponds with the provisions in regulation 35B(9) of The Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (the Regulations).

Scope of the review

The TRA will consider whether the tariff rate quotas to which certain steel products are subject should be varied. The TRA will consider whether certain commodity codes in categories 4 and 7 which have been specified in the applications should be removed from the safeguard measure.

The following commodity codes are the goods subject to review, in accordance with requests in the applications:

Category 4 – metallic coated sheet

7210 6100 20

7210 6900 80

Category 7 – non-alloy and other alloy quarto plates

7208 5191 00

7208 5291 00

7208 5198 00

7208 5120 00

7208 5299 00

7208 5120 10

For more information about this case including further details about the goods subject to review, you may refer to the Notice of Initiation published at:



<https://www.trade-remedies.service.gov.uk/public/case/TQ0077/submission/b1168828-12d3-49f7-9a59-013da369906d/>

Instructions

I – Who should complete this form

You should complete this form if you wish to register your interest in the TRQ review and comment on the proposed changes to the TRQ concerning Categories 4 and 7. The applications are available on the public file.

II – Note about confidentiality

Anyone requesting that information be treated as confidential must demonstrate to the TRA good cause as to why the TRA must treat such information as confidential and 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:

<https://www.trade-remedies.service.gov.uk/public/case/TQ0077/#public-file>



Registration questions

Section A – Your organisation’s interest in the review

To register your organisation’s interest in this TRQ review **you must complete question A1**. All other questions are optional and can be left blank.

A1. Please describe your interest in this TRQ review:

Tata Steel UK Limited (TSUK) is the sole producer of category 4 and 7 products in the UK. The outcome of this investigation will have a direct impact on our company.

Section B – Questions concerning category 4 and 7 products

B1. If you are a UK producer of category 4 or 7 products or goods that are directly competitive with these product categories OR an overseas exporter or producer of the goods subject to review, please state which relevant products you produced during the POI or have the facilities to produce at a 10-digit commodity code level.

Please provide evidence to support this, such as documentation of production facilities capable of producing category 4 or 7 products, or any other evidence that demonstrates that your organisation can produce category 4 or 7 products.

TSUK produces a broad range of steel products falling within product categories 4 and 7. TSUK’s manufacturing capability in respect of these products has been verified by the TRA in multiple investigations, including product-specific reviews (TD0031 for Category 4 and TD0071 for Category 7). The TRA has also conducted on-site visits to TSUK’s facilities where the products concerned are manufactured.

With respect to the goods subject to review, TSUK addresses each relevant category below.



Category 4

TSUK produces goods falling under commodity code 7210610020. TSUK has provided a copy of an invoice for this material, which explicitly state both the commodity code and the UK origin, in Annex 1. Although the specific product referenced is not Aluzinc, it demonstrates the existence of domestic production of goods classified under commodity code 7210610020. Consequently, excluding this commodity code from the measures would be unlawful.

With respect to commodity code 7210690080, TSUK submits that it manufactures directly competitive products within the meaning established by WTO panel jurisprudence (see TSUK's response in Section C). As explained therein, products need not be fully substitutable to qualify as "directly competitive"; it is sufficient that imports are capable of causing injury to the domestic industry.

In this regard, TSUK makes two observations. First, there are applications in which Aluzinc/aluminized steels can be used instead of TSUK's products when competitively priced. While ISTA argues that such substitution is currently limited due to the price premium of Aluzinc/aluminized steels, the very purpose of its request is to enable higher-volume imports at lower prices. It is therefore plausible that this premium would diminish (or disappear) under conditions of unconstrained supply. The UK market has already experienced a comparable dynamic in respect of cold-rolled steel: following the revocation of safeguards, import prices fell sharply and, at one point, converged with hot-rolled steel prices, notwithstanding the fact that cold-rolled steel is a downstream product with structurally higher costs.

Category 7

TSUK provides evidence of the manufacture and sale of products classified under commodity codes 720585291, 72085120, 72085299, and 72085198 in Annex 2. With respect to commodity code 72085191, while TSUK has not identified direct evidence of current production, it has the technical capability to manufacture this product, as it represents a combination of parameters already produced by TSUK (width under 720585291 and thickness under 72085198).

In any event, commodity code 72085191 is directly competitive with other category 7 products manufactured by TSUK, as well as with other plate products not covered by the present review. This competitive relationship arises across multiple applications, including floor plates, shipbuilding, and heavy machinery. It is particularly pronounced for commodity code 72085191, which covers wide plate products that can be split or trimmed to size, especially when offered at competitive prices.



B2. If you are a UK importer of category 4 or 7 products, please state which relevant products that you have imported during the POI at a 10-digit commodity code level.

Please provide supporting evidence such as purchase invoices or contracts with suppliers.

N/A

B3. If you are a UK importer of category 4 or 7 products, have you attempted to purchase the like goods or directly competitive goods from UK producers. If this attempt did not result in procurement of the like goods or directly competitive goods from a UK supplier, please explain why your organisation chose to use an overseas supplier instead.

Please provide supporting evidence, such as procurement process documentation.

N/A

B4. Please comment on whether there are any goods produced in the UK that are directly competitive with the category 4 and 7 products captured by the commodity codes listed within the scope of this review. If so, please explain to what extent are these goods directly competitive.

Please provide supporting evidence, such as documents proving common use cases.

Please refer to TSUK's response in Section B1.

B5. Please comment on whether it is likely that UK producers of the like goods or directly competitive goods would be injured if the goods subject to review were removed from the safeguard measure. If so, please comment on how significant this injury would be.



Please provide supporting evidence.

TSUK submits that it is highly likely to suffer serious injury should the goods subject to review be removed from the safeguard measure. As set out above, TSUK produces the goods subject to review under category 7 and produces like or directly competitive goods under category 4. The removal of safeguard protection would therefore expose TSUK to injurious effects both directly and through substitution across closely related product segments.

Category 7

As explained above, TSUK manufactures, or has the technical capability to manufacture, the category 7 products subject to review. The removal of safeguard measures would predictably lead to an increase in imports of these products, which is the objective of the request for removal. Increased import volumes would, in turn, exert downward pressure on prices as a result of expanded supply and intensified competition among exporting countries.

In addition to price effects, there is a high likelihood that the category 7 products subject to review would increasingly be used as substitutes for other plate products manufactured by TSUK that share the same applications and end users. As demonstrated above, the overlap in applications (particularly in sectors such as construction, shipbuilding, and heavy machinery) is substantial. TSUK would therefore be exposed simultaneously to (i) increased import volumes, (ii) price suppression, and (iii) displacement of sales of both like and directly competitive TSUK products. Taken together, these effects would inevitably result in serious injury to TSUK.

Category 4

The removal of safeguard measures on category 4 products would similarly give rise to a clear risk of serious injury. As demonstrated above, TSUK produces goods classified under commodity code 7210610020 and manufactures products that are directly competitive with the Category 4 goods subject to review, including aluminized and Aluzinc-coated steels.



The removal of measures would be expected to lead to a significant increase in imports of category 4 products. As with category 7, an increase in import volumes would place downward pressure on prices. While certain category 4 products currently command a price premium, as explained above, unconstrained imports at scale are likely to erode or eliminate existing price differentials, thereby enabling substitution in applications where TSUK's products are currently used.

In these circumstances, TSUK would face material risks of price undercutting and price suppression, as well as loss of market share through substitution of imported category 4 products for TSUK's domestically produced goods. Given the demonstrated substitutability across multiple applications and end users, and the UK market's prior experience of rapid price convergence following safeguard removals, the likelihood of serious injury to TSUK is clear.

Section C – Further comments concerning the applications and any other aspect of this TRQ review

C1. Please provide any further comments concerning the applications or any other aspects of this TRQ review.



In this section, TSUK provides comments on the legal aspects of the present TRQ review, as well as a response to certain claims and allegations raised by ISTA in its application.

1. Removing the goods subject to review would be contrary to WTO law and jurisprudence

TSUK submits that removing the goods subject to review from the safeguard measures inconsistent with WTO law and jurisprudence. The alleged absence of domestic production of a particular product type does not constitute a valid basis for excluding that product from the application of safeguard measures.

Safeguard measures are imposed to protect the domestic industry of 'like goods' and 'directly competitive goods' from serious injury caused by imports of 'goods concerned' (i.e. imported products). While these categories may overlap, they are used to describe different products that do not necessarily match each other in terms of various characteristics. Defining 'like goods', 'directly competitive goods' and 'goods concerned' as the exact same products would not only be illogical (as having all three terms to describe the exact same product would be redundant) but would also undermine the purpose of the safeguard measures.

As confirmed by WTO jurisprudence, these concepts are used to define the domestic industry and to assess whether that industry is appropriate in relation to the imported products (Panel Report, *Dominican Republic – Safeguard Measures*, para. 7.191; Appellate Body Report, *US – Transitional Safeguard Measure on Combed Cotton Yarn from Pakistan*, para. 95). The critical question is whether there exists a competitive relationship between the imported goods and domestically produced like or directly competitive goods, and whether imports have prejudicial effects on the domestic industry (Appellate Body Report, *US – Lamb*, paras. 86–87).

In the present case, there can be no doubt that TSUK and the UK steel industry constitute the appropriate domestic industry in relation to the product types at issue. As demonstrated above, the imported products referred to by ISTA are in direct competition with TSUK's products, and a rapid increase in imports of such goods would inevitably cause serious injury.



Moreover, WTO panels have consistently confirmed that imported products need not be identical or fully substitutable to cause serious injury. As stated by the Panel in *US – Safeguard Measure on Washers*, competition is not limited to cases of near-perfect substitutability, and an investigating authority is entitled to assess whether an imported product that is not perfectly substitutable nonetheless causes injury through competitive effects (paras. 7.64–7.65):

“Indeed, competition is not limited to situations where imported and domestic products are close to perfectly substitutable. Thus, to the extent Korea takes the view that ‘like’ under Article 4.1(c) requires close to perfect substitutability between imported and domestic products, we disagree. We see no textual basis for such a view. To the extent an imported product that is not perfectly substitutable with the domestically produced good has the capacity to cause serious injury to that good through some form of competitive impact, we do not see any basis to interpret ‘like’ in Article 4.1(c) to exclude such goods. Instead, an investigating authority is entitled as part of its causation determination to examine whether that imported product did cause injury to the domestic industry through that competitive effect. We do not consider that the drafters of the Agreement on Safeguards would have intended the domestic industry to be defined in a way that would preclude the investigating authority from making such a causation determination.” (Panel Report, *US – Safeguard Measure on Washers*, paras. 7.64-7.65) (emphasis added)

In TSUK’s view, the above is sufficient to reject ISTA’s legal claims. For completeness, TSUK has nevertheless addressed ISTA’s product-specific arguments in the sections above.

2. ISTA’s claims on change in market circumstances and quota availability are not supported by evidence

In its application for review, ISTA states the following:

“The principle change since the announcement of the revised safeguarding measures commencing on 1st July 2025 significantly restricts imports from major supplier countries (including South Korea and Vietnam). These restrictions will materially alter market access conditions for UK importers and downstream manufacturers who are wholly reliant on imported supply of Aluzinc and Aluminized products. At the time of the original safeguard introduction, there was limited differentiation between coated steel product categories. It is now clear that Aluzinc and Aluminized steels are distinct, non-substitutable speciality products used in specific industrial and construction applications, which differ fundamentally from commodity metallic-coated sheet (category 4)”.



TSUK strongly disagrees with this characterisation, which misrepresents both market reality and quota availability.

Quota utilisation data for categories 4 and 7 clearly demonstrate that the market has access to substantial unrestrained volumes under the existing quotas. For the last two full quarters for which data are available, hundreds of thousands of tonnes of quota remained available for category 4, while category 7 quotas were only marginally utilised. Although TSUK’s extraction for Q4 2025 was made on 14 December, TSUK has no reason to believe that the overall utilisation picture materially changed before year-end.

Table 1. Quota consumption (1 July to 30 September 2025)

C (04) - MCS	058006	European Union	333,545	118,360	35.5%
	058007	All others	85,595	24,893	29.1%
	058088	Taiwan	34,484	17,920	52.0%
	058106	India	25,468	395	1.6%
	058107	Turkey	0		
M (07) - Quarto Plates	058014	European Union	71,178	52,642	74.0%
	058700	All others - South Korea	5,080	5,080	100.0%
	058701	All others - Japan	5,080	132	2.6%
	058702	All others - USA	5,080	692	13.6%
	058703	All others - Canada	5,080	0	0.0%
	058704	All others - Taiwan	5,080	6	0.1%
	058705	All others - Switzerland	5,080	0	0.0%

Table 2. Quota consumption (1 October to 30 December 2025)

C (04) - MCS	058006	European Union	324,154	101,575	31.3%
	058088	Taiwan	33,513	29,155	87.0%
	058106	India	24,752	20,768	83.9%
	058410	All Others - Vietnam	12,839	12,839	100.0%
	058411	All others - South Korea	12,839	12,839	100.0%
	058412	All Others - Japan	12,839	36	0.3%
	058413	All Others - United States	12,839	62	0.5%
	058414	All Others - Singapore	12,839	0	0.0%
	058415	All Others - Canada	12,839	0	0.0%
	M (07) - Quarto Plates	058014	European Union	71,178	41,452
058700		All others - South Korea	5,080	5,080	100.0%
058701		All Others - Japan	5,080	78	1.5%
058702		All others - USA	5,080	5	0.1%
058703		All Others - Canada	5,080	0	0.0%
058704		All others - Taiwan	5,080	14	0.3%
058705		All others - Switzerland	5,080	0	0.0%



The data further show that significant volumes of quota remained available for non-EU sources, including India (25kt in Q3 and 4kt in Q4) and Taiwan (17kt in Q3 and 4kt in Q4), notwithstanding ISTA's claims of restricted access. This is particularly notable given the relatively small size of the UK market for these products, which is slightly above 10 kt per annum for Aluzinc and approximately 24 kt per annum for aluminized steels, based on HMRC data.

With respect to Category 7, import data for the same periods indicate that imports were overwhelmingly sourced from the EU and Korea, while substantial residual quota remained unused (approx. 80% or 20kt available in each quarter). Moreover, the EU quota was used by 55%-74% (with 20-30kt remaining available). This demonstrates that ISTA's concerns do not relate to quota availability as such, but rather to a preference for specific low-priced origins (such as Korea and Vietnam).

In light of the above, TSUK submits that there has been no change in market circumstances that would justify a review of the existing measures, let alone product-specific exclusions.

2. Final comments

First, TSUK notes that importers raised materially identical claims regarding Category 4 products in the context of the previous TRQ review (TQ0066). Following that review, the TRA did not exclude Category 4 products from the safeguard measures. Reaching a different conclusion in the present review, on substantially the same factual and legal basis, would be inconsistent with prior TRA practice and would undermine legal certainty.

Second, TSUK observes that no other major investigating authority has adopted the approach advocated by ISTA. In particular, the European Commission has consistently rejected requests to exclude any products from its safeguard measures, despite repeated applications by importers, and the United States has cancelled the exclusion process Section 232 (which was much more nuanced than blanket exclusions when it was in place).

Third, and only in the alternative, should the TRA nonetheless conclude that an adjustment to the measures is necessary, TSUK submits that **category 4 products subject to review should be placed in a clearly defined and separate sub-category, with a dedicated quota strictly based on historic import volumes. The volume of this quota should be deducted from the original quota for category 4.**



While TSUK maintains that such an approach would be inconsistent with WTO law and UK market realities, it would at least ensure that these products cannot be used to circumvent the safeguard measures and that imports remain confined to historic trade levels, thereby preserving the core objective of the safeguards.

By contrast, with respect to category 7 products, TSUK submits that **any modification to the existing product scope would be unlawful** and would inevitably result in serious injury to the domestic industry, given that TSUK produces, or has the demonstrable capability to produce, the goods subject to review.