



## Registration Form

### Tariff Rate Quota (TRQ) Review

Case No. TQ0078

**Period of Investigation:** 1 October 2024 – 30 September 2025

**Deadline for response:** 25<sup>th</sup> January 2026

**Case Team Contact:** TQ0078@traderemedies.gov.uk

**Completed on behalf of:** Tinsley Bridge Limited and Tyzack Machine Knives. Both companies are 100% owned by Tinsley Bridge Group.

**Party type (select most relevant party type):**

- 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



Trade Remedies  
Authority

Trade Remedies Authority

Confidential  Non-Confidential

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 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 Category 12A 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 review all commodity codes in product category 12A to consider if any codes should be removed from the safeguard measure, as requested in the application.

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

### Category 12A - Alloy merchant bars and light sections

7228 3020 00  
7228 3041 00  
7228 3061 00  
7228 3069 00  
7228 3070 00  
7228 3089 00  
7228 6020 00  
7228 7010 00

For more information about this case, you may refer to the Notice of Initiation published at:

<https://www.trade-remedies.service.gov.uk/public/case/TQ0078/submission/005a55bf-31aa-4ac5-bf8e-883a957132ff/>.



## 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 Category 12A. The application is 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/TQ0078/#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:

Tinsley Bridge (TBL) and Tyzack Machine Knives (TMK) import steel under Category 12a HS codes 7228 3020 00, 7228 3069 00, 7228 7010 00. These grades are not available from UK suppliers.

Tinsley Bridge are a Tier 1 supplier to OEM vehicle manufacturers. The imported steel bars are specialist spring steel grades used in the manufacture of automotive suspension components. Manufactured products supplied are safety critical suspension components fitted to vehicles.

100% products exported, primarily to multiple EU vehicle assembly plants but also worldwide including USA and Canada.

Tyzack are importing engineering steels for the manufacture of precision heat treated industrial cutting blades and machine knives for the scrap, demolition and steel processing industries. 60% of Tyzack sales are to USA and a significant proportion of the balance supplied to other export customers, primarily in the EU.

Both companies are concerned about protecting the UK steel industry against unfair practices from non UK steel manufacturers. However our business has no alternative in import raw material from EU steel mills as the products are not available from UK sources.

### Section B – Questions concerning category 12A products

**B1. If you are a UK producer of category 12A products or goods that are directly competitive with this product categories OR an overseas exporter or producer of the goods subject to review**, please state which relevant products you produce or have the facilities to produce at a 10-digit commodity code level.



Please provide supporting evidence to support this, such as documentation of production facilities capable of producing category 12A products, or any other evidence that demonstrates that your organisation can produce category 12A products.

Click or tap here to enter text.

**B2. If you are a UK importer of category 12A products**, please state which relevant products you have imported during the POI at a 10-digit level commodity code level.

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

Tinsley Bridge (TBL) and Tyzack Machine Knives (TMK) import steel under Category 12a HS codes 7228 3020 00, 7228 3069 00, 7228 7010 00.

Contracts with suppliers are in the form of price agreements. Surcharges for alloys, scrap and energy are adjusted monthly according to published indexes, with invoices subject to the index at the time of despatch from the steel mill (not order date).

**B3. If you are a UK importer of category 12A 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.



Purchase is predominantly direct from steel mills. To achieve end product performance we order against internally developed specialist raw material specifications. These includes tolerances, cleanliness, composition requirements, decarburisation, steelmaking protocols etc. and can be more demanding than normal steel industry standards.

Tinsley Bridge order steel grades within 7228 3069 as defined in BS970 : Part 2 : 1988 and internal specifications. Our specifications contain precise alloy compositions, tolerances and steel processing requirements. For a range of diameters these facilitate the metallurgical properties needed to achieve a combination of high strength, dynamic performance and durability in the products supplied to customers. These products must also meet vehicle manufacturer's specifications.

Liberty Steel theoretically have the capability to supply grades in 7228 3069 but have not manufactured these grades for over 25 years and have declined all invitations to quote in recent years. They are not an approved supplier for this raw material. To become an approved supplier to our business would involve a large scope of sample batches, metallurgical and performance testing prior to joint approval with our vehicle producing customers. The process for validation and testing would take minimum 12-15 months before approval to order bulk material from Liberty could be authorised. With the subsequent lead-time to run out existing commitments and receiving a first bulk quantity, realistically it will take 18 months before we could incorporate UK material in our products. The timing cannot start until from Liberty agree to re-engage in this market and can make a competitive offer. Until this happens there are no UK sources available.

We have consistently approached Liberty over the last 5 years to supply 7228 3020 00 & 7228 7100 00 requirements. Communication from Liberty is very erratic and often these enquiries have received no or incomplete response. The limited information received from Liberty identify the only potential source of the required grades would be the Stocksbridge plant but Liberty required upfront payment for the full cast of steel, more than 120 tonnes. Liberty would be unable to confirm the delivery lead-time of any order which is completely unworkable. In comparison we are currently buying from European suppliers who provide the steel on normal commercial terms in minimum of 3 tonne batches on 60 days net monthly terms. Even if Liberty could offer the required range of steels, neither ourselves or other companies can work with the Liberty terms and their degraded expertise to produce these grades is now limited. On 21st August 2025 the High Court granted a winding up order and the Official Receiver was subsequently appointed to liquidate Liberty. Under these circumstances there is no potential to introduce Liberty as a supplier.

Current Category 12a safeguarding creates potential injury and jeopardy to downstream metal manufacturers when there is no viable UK source available.



B4. Please comment on whether there are any goods produced in the UK that are directly competitive with category 12A products. If so, are they directly competitive with all goods in category 12A or only certain commodity codes, and to what extent are these goods directly competitive.

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

Tyzack could potentially source a limited number of the imported grades from British Steel. Tyzack currently buy these grades through SST (Steel Services & Trading Ltd) who are a stockholder. In the case of British Steel, the steel billets would be made at Scunthorpe and then rolled at Skinningrove. They can only do about 25% of the size range we need, it is very expensive and on extremely long lead times.

We have demonstrated several times that the equivalent grade from British Steel is not compatible with our machining or heat treatment processes without significant cost increases for additional machining and/or special heat treatment. This is not commercially viable.

Past experience identified problems on the quality of the rolling. Tyzack requires more accurately rolled steel to be efficient. There has been no commitment from British Steel that they could implement actions to achieve the dimensions and tolerances we require.

British Steel are not commercially competitive, able to offer suitable order terms and unable meet our technical specifications. They are not viable as our supplier for this steel.

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.

In terms of overall steel manufacture, Tyzack volumes are comparatively small and not significant enough to cause injury to British Steel if the safeguarding measure was removed. For example, Tyzack direct imports of Category 12a material is of the order of 50 tonnes/ year.



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

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

We unequivocally support the CBM submission requesting a TRQ review based on the details they have presented.

Category 12A imports by our company cannot be sourced within the UK. These steels are complex high alloy grades. The material specifications have been developed over many years and require extensive nuances in the alloy composition and steel making process, as well as significant know how in our manufacturing process. The grades are not substitutable due to the technical specification, performance criteria and customer requirements involved.

Steel purchases typically comprise nearly 40% of sales value and so have a very large impact on the competitiveness of Tinsley Bridge products in global markets & limited margins. If 25% safeguarding tariffs are incurred the business becomes loss making and quickly unviable.

As an example, between July 2021 to June 2022 TBL incurred over £500,000 tariff costs when Category 12 quotas repeatedly exhausted. The tariff costs incurred over this time are greater than the annual profit levels of the business. Customers are predominantly EU based and refuse to accept UK tariff costs. In their words, they didn't vote for Brexit and can switch supply to EU and other global competitors if the UK becomes uncompetitive. This tariff is entirely the responsibility of the UK Government.

Tariffs cause immediate cash flow issues as charges are taken by HMRC at the point of import, significantly before the business invoices the end product. Selling credit terms add time to receive payment long after tariff charges. If the business cannot demonstrate profits it is impossible to get Trade Credit Insurance, further precipitating the cashflow crisis in addition to the financial loss.

Repeated tariffs either push the business into administration or the need to breach contracts with customers asking for exceptional support. This will put us on the customer resource list.

The jeopardy from repeating tariffs can quickly impose unmanageable trading difficulties. Continuing financial risks made the case for the automotive component business unsustainable, essential future investment not viable, and the business was closed in September 2024. Customers have transferred to competitor suppliers in the EU, India and China. The business closure resulted in the loss of 100 jobs, £20m sales (100% exported) and the end of a company that had manufactured since 1841.

Whilst the quota has not exhausted in recent quarters, historical market demand is highly volatile. Depressed trading could quickly increase and quota consumption exhaust. In this situation any government decision making is unlikely to be quick enough to prevent serious injury to downstream manufacturers. Risks are increased by recent reductions to the quota carry over, and the threat of new quota reductions currently under consideration.