



Registration Form

Tariff Rate Quota (TRQ) Review – Developing Country Exception

Case No. TQ0085

Period of Investigation:	1 January 2025 to 31 December 2025
Deadline for response:	6 March 2026
Case Team Contact:	TQ0085@traderemedies.gov.uk
Completed on behalf of:	Tezcan Galvanizli Yapı Elemanları Sanayi ve Ticaret A.S. Arslanbey OSB- Kartepe Türkiye
Party type (select):	<input type="checkbox"/> UK producer <input checked="" type="checkbox"/> Other (Exporter)

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 6 March 2026.



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TRQ review

In conducting this TRQ review, the TRA will consider whether there has been a change in circumstances since the application of the relevant tariff rate quota (see below). 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 4 to determine if there has been a change of circumstances which corresponds with the provisions in regulation 35B(9)(f) of The Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (the Regulations).

The TRA has seen data which indicates that the import levels from a certain developing country have changed since the application of the measure. The TRA is now reviewing this data to determine whether the list of developing countries not currently excepted from the application of the tariff rate quotas should be amended.

Scope of the review

This TRQ review will consider the developing country exceptions as it applies across category 4 steel products – metallic coated sheet. These goods are classified under the following commodity codes:

7210 2000
7210 4100
7210 4900
7210 6100
7210 6900 20
7210 6900 80
7210 9080
7212 2000
7212 3000
7212 5020
7212 5030
7212 5040
7212 5061
7212 5069



7212 5090
7225 9100
7225 9200
7225 9900
7226 9910
7226 9930
7226 9970

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 register your interest in the TRQ review and comment on the application made by the UK industry on the proposed change to the TRQ on category 4 steel products. 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 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 TRQ review, please complete the text boxes below.

A1. Please describe your interest in this TRQ review:

Tezcan Galvaniz Sanayi ve Ticaret A.Ş. is a producer and exporter of metallic coated steel products falling within Category 4 of the UK steel safeguard measure. The company exports limited volumes of these products to the United Kingdom market and therefore has a direct commercial interest in the outcome of this TRQ review.

Exports to the UK represent only a small proportion of the company’s overall production and international sales. The company participates in the UK market primarily to maintain long-standing commercial relationships with UK customers and to support stable supply chains.

Given its role as an overseas exporter of the goods subject to this review, Tezcan Galvaniz Sanayi ve Ticaret A.Ş. has a legitimate interest in providing comments on the TRQ review concerning the developing country exception and the allocation of tariff-rate quotas for Category 4 products.

Section B – Comments on the application, on the expansion of the matters to be considered (referred to in the Notice of Initiation) and/or proposed intended final determination

B1. Please use the box to comment on this TRQ review:



Tezcan Galvaniz Sanayi ve Ticaret A.Ş. notes that the application submitted by the UK industry relies primarily on a short-term increase in imports from Türkiye observed over a limited number of months. A temporary increase in imports over such a short period cannot reasonably be interpreted as evidence of a structural change in trade patterns.

The increase referred to in the application appears to be concentrated within a very short timeframe and reflects normal fluctuations in international steel trade rather than a sustained shift in market dynamics. Short-term movements in import volumes are common in the steel sector and are often driven by timing of shipments, order cycles, inventory adjustments and temporary market conditions.

In addition, the data presented shows considerable volatility in the United Kingdom's overall import patterns for Category 4 products during the same period. UK total imports increased significantly towards October and subsequently declined sharply in the following month. Such movements demonstrate that the market experienced substantial short-term fluctuations, which cannot be interpreted as a stable or predictable trend.

For example, the available import figures indicate that total UK imports increased by approximately 51% when moving into October, followed by a sharp decline of roughly 74% shortly thereafter. Such pronounced month-to-month changes illustrate the volatility of the market and confirm that short-term developments should not be treated as evidence of a structural change in trade flows.

Furthermore, export volumes from Tezcan Galvaniz Sanayi ve Ticaret A.Ş. to the United Kingdom during the relevant period remained limited. These shipments were occasional and commercially driven, and they do not represent a consistent expansion of exports to the UK market.

Given the inherently volatile nature of steel trade and the presence of significant short-term fluctuations in overall UK imports, the developments observed during a limited number of months should not be interpreted as a structural shift in market conditions. Temporary market movements are difficult to predict and should be assessed with caution when evaluating longer-term trade patterns.

In light of the above considerations, it is respectfully submitted that the conclusions drawn from a short-term change in import volumes should be carefully assessed, taking into account the broader context of market volatility and the limited scale of individual exporters' shipments. Furthermore, we also would like to highlight that our exports are at a low level and its total share does not have any impact on your domestic market. We have always tried to keep our exports at such levels that we would not bother any domestic market, which can be clearly noticed. For this reason our request would be to consider an exporter based quota which would be more fair and would at the same time not disrupt the domestic market.