



Registration Form

Tariff Rate Quota (TRQ) Review

Case No. TQ0078

Period of Investigation: 1 October 2024 – 30 September 2025

Deadline for response: 25th January 2026

Case Team Contact: TQ0078@traderemedies.gov.uk

Completed on behalf of: 7-Steel UK.

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) 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-bfbe-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:

We are a long-established UK producer of products very similar to those covered by the review (Cat 12B). We are concerned that if the requested amendment is made there will be a negative impact on our business with potential significant effects on our sales, share of market, and consequently production levels and employment opportunities.

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.

7 Steel UK are not producers of the cat 12A grades but produce codes in cat 12B that for the reasons expressed in the additional information provided in the annex, we believe it is relevant to consider the impact on our business due to the connectivity of many steel products.

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.

Not applicable



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.

Not applicable

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.

Please see the additional information in the below annex.

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 see commentary in the below annex.

Please provide supporting evidence.

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.

7 Steel UK appreciate the work of the TRA and understand the processes, however the timescales involved in being made aware of the case and needing to submit evidence could be reviewed. We would suggest the need to register an interest early in the process be separated out from the need to provide detailed evidence and commentary with that aspect working to more realistic timelines.

Annex 1 – Detailed commentary from 7 Steel UK

We are registering interest in the recently opened investigation TQ0078 into the safeguards for category 12A products (alloyed merchant bar). 7-Steel is not in support of the application for amendment of the safeguards and the exclusion of category 12A from quota restrictions.

We are a long-established UK producer of like products (cat 12B) and are concerned that the requested amendment to safeguards could have a significant negative effect on our business, with consequent potential impact on the viability and the employment levels of a significant part of our company.

7-Steel makes commercial merchant bars which, in all visible aspects (cross section dimensions and lengths, surface aspects), are exactly the same as alloy merchant bars. The only difference is the metallurgical properties or chemistry of the products which can only be verified through laboratory testing (most commonly evidenced by test certificates). We currently employ nearly 1000 people on our Cardiff sites, converting raw material scrap steel into semi-finished and finished steel products, ranging from rebar, wire rod, structural sections, light sections and merchant bar (flats, angles, channels and rounds).

We have significant empathy with the members of CBM, as witnessed by the previous joint amendment proposal brokered between UK Steel and CBM and accepted by the Secretary of State in 2022. As CBM correctly state in their submission, at that time some importers of category 12 products were taking up all the available quota in supplying mild steel merchant bar products which adversely affected both CBM members and ourselves (as CELSA Steel). The suggestion to split category 12 at that time into alloy steels (12A) and non-



alloy steels (12B) seemed to offer some reasonable positive benefit for both CBM members and UK Steel members.

However, since the split of the categories, quotas for category 12A products have been increased and the situation now is that there are no issues of quota exhaustion. Indeed, for the last 3 quarters import figures show that requirements of cat 12A would have to treble to fill the quota. CBM contend that their members wish to import from EU sources. In the last year, EU quotas for category 12A have been very poorly utilised (<40% utilisation). There has been no evidence of difficulties for CBM members because of the safeguard mechanism. Given that there is no issue it is therefore difficult to understand why this request for investigation has been lodged. In this product category (12A) there is more than ample quota available to cope with a very significant upturn in business for CBM members.

As CBM say, there were some unintended consequences of the unusual separation of categories into 12A and 12B. HMRC customs officers found it difficult to distinguish between alloy and non-alloy products. From a visual perspective, there is no difference and they were asked to study test certificates and determine whether a consignment was of alloy or non-alloy grade. Under normal circumstances the issue of misdeclaration of goods can be problematic, but given the marginal technical differences of this separation, the incidence of misdeclaration increased. This was made even more difficult by some importers deliberately misdeclaring their deliveries.

What is true is that the issue of mis-classification of goods is a real one. The whole customs system is based around coding of goods and correct coding has always been a challenge. Over many years there have been issues about importers bringing in goods that are wrongly declared, in some cases by accident or because customs officers find it difficult to determine with the multitude of codes, and in other cases with an intention to circumvent restrictions. The more complicated the system, the more likelihood there is for mistakes to be made. If we acknowledge that splitting category 12 products has been difficult for HMRC customs officials to administer because of the fact that there is no physical difference between 12A and 12B products, the sensible solution is to re-amalgamate all category 12 products rather than have some cat 12 products inside the safeguard system and some outside.

Equally, if cat 12A products were removed from safeguards, it is likely that products currently supplied under cat 12B would be reclassified by importers as alloyed, or indeed small alloying contents would be deliberately added by manufacturers to make them alloyed steels. There is a precedent for this in the



last 10 years when wire rod producers in China were deliberately adding small quantities of boron in order to have them classified as alloy steels.

It should be noted that no other jurisdiction has made a similar attempt to distinguish between like or similar products in splitting cat 12 into sub-categories.

Whilst not directly impacting 7-Steel, we are concerned that the efforts to find buyers for the ex-Liberty Speciality Steel assets may be frustrated by the removal of safeguard measures on products LSS has made in the past.

Quotas are sufficient to cope with increased demand for cat 12A products and therefore there is no rational reason for changing the safeguards. There is no current issue.

7-Steel is sympathetic with the overall position of CBM members in wanting UK manufacturing to thrive and be supported in our efforts to grow but this should be done in a way that does not compromise another part of the UK manufacturing base. We believe that the recommendation suggested by CBM will lead to significant problems for 7-Steel as a producer of non-alloy merchant bar products as imported goods will be falsely classified to avoid the quota system. We also believe that the sales prospects of former LSS assets will be damaged in the event of any change to the safeguard mechanism.

If the TRA wishes to be seen to adjust the mechanism in any way, the most suitable step would be to re-amalgamate cat 12A and 12B into cat12 in order to avoid some of the issues described above and raised by CBM.