



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: Babcock Rosyth Royal Dockyard Ltd

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



IN-CONFIDENCE

Trade Remedies
Authority

Trade Remedies Authority

Confidential Non-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:

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.

Click or tap here to enter text.



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.

Click or tap here to enter text.

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.

1. No UK steel mill currently manufactures marine grade steel plate from 4 mm thick to S class flatness. UK suppliers can source it, but the rolling is done in Europe. Marine grade plate is actually used in the UK is rolled by mills in: Germany, Belgium, Netherlands, France, Italy and Scandinavia. There are only two mills in Europe that can mill to meet 'S' Class flatness and one of those has been sanctioned by both the UK & The EU. Babcock has also had to source into Asia for marine grade steel product due to cost and supply & demand challenges.

2. Babcock's supplier page emphasises the need for a strong, trusted UK supply chain and highlights its reliance on UK based suppliers to support operations. A Made in Britain briefing confirms that Babcock procures around £2.6 billion of goods and services annually and is "committed to partnering with UK manufacturers". This directly supports the claim that Babcock sources materials — including steel — from within the UK where possible. The Bid Stats supplier analysis lists a wide range of UK companies that supply Babcock across multiple contracts. While this list covers many categories, it demonstrates that Babcock's procurement strategy is heavily UK centric. Babcock has two long term framework agreements with UK Steel Stockholders and UK steel is purchased where possible and available.



Please provide supporting evidence, such as procurement process documentation.

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.

Click or tap here to enter text.

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.

Click or tap here to enter text.

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.

Click or tap here to enter text.