

TRA Review No: TQ0085

Product: Category 4 – Metallic Coated Sheet

Submitting Party: Borçelik Çelik Sanayi Ticaret A.Ş.

Borçelik Çelik Sanayi Ticaret A.Ş. is a Turkish producer and exporter of metallic-coated flat steel products to the United Kingdom. As a long-standing supplier to the UK market, Borçelik is directly affected by the proposed amendment to Türkiye's Developing Country Exception (DCE) status under the Category 4 Tariff Rate Quota (TRQ) measure.

These comments are submitted in response to the initiation of Review No. TQ0085.

1. Strategic Trade Framework and Geographic Proximity

Türkiye and the United Kingdom are parties to a Free Trade Agreement (FTA), which establishes a structured, rules-based, and mutually beneficial trade relationship. This framework reflects the strategic importance of bilateral trade and supports continuity and predictability in supply chains.

In addition, Türkiye's geographic proximity to the UK provides structural advantages compared to more distant suppliers, including shorter and more reliable lead times, lower transportation costs, and reduced logistical risk. These factors contribute positively to supply security and market stability in the UK.

2. Complementarity with UK Production

Turkish exports of metallic coated sheet are complementary to UK domestic production. Turkish producers manufacture certain grades and qualities that are not sufficiently available or produced in the UK market.

Accordingly, imports from Türkiye do not displace domestic production but rather support downstream industries by filling quality and supply gaps. Maintaining stable access to these products is important for sectors such as construction, white goods, and automotive manufacturing.

3. Importance of Maintaining DCE Status

The continuation of Türkiye's DCE status under the Category 4 TRQ is important for the proper functioning of the UK market.

Placing Türkiye within the residual quota would increase the risk of quota exhaustion, create supply volatility and uncertainty for UK importers and users, and distort traditional trade flows.

Türkiye represents a stable and established supplier with predictable export volumes, not a source of injurious or disruptive import surges. For these reasons, Borçelik respectfully submits that Türkiye's DCE status should be maintained.

4. Alternative Approach: Reallocation of a Country-Specific Quota

Should the TRA nevertheless decide not to maintain Türkiye's DCE status, Borçelik submits that a return to a country-specific quota allocation — as previously applied — would constitute a more proportionate and equitable solution.

A dedicated country allocation of not less than 23,800 tons, as previously applied, would:

- Preserve traditional trade flows,
- Provide predictability and planning security to UK importers and end-users,
- Prevent competitive distortions within the residual quota pool,
- Reflect Türkiye's historical and stable export presence in the UK market.

Türkiye should not be placed within the residual quota category, as this does not appropriately reflect the nature, scale, and stability of its trade with the United Kingdom.

As a conclusion, Borçelik respectfully requests that the Trade Remedies Authority:

- Maintain Türkiye's Developing Country Exception status under the Category 4 TRQ; or
- Alternatively, re-establish a fair and proportionate country-specific quota allocation for Türkiye, rather than placing Türkiye within the residual quota.

Borçelik remains ready to provide further supporting data if required.

Borçelik Çelik Sanayi Ticaret A.Ş.