



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: [Hoa Sen Group \(HSG\)](#)

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

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**.



Contents

TRQ review.....	4
Change in circumstances.....	4
Scope of the review.....	4
Instructions	5
I – Who should complete this form	5
II – Note about confidentiality	5
Registration questions	6
Section A – Your organisation’s interest in the review	6
Section B – Questions concerning category 4 and 7 products.....	6
Section C – Further comments concerning the applications and any other aspect of this TRQ review.....	11



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:

HSG is a leading manufacturer and trader of coated steel products in Vietnam, with a nationwide plant system and a wide distribution network, supplying products to both the domestic market and exports to more than 90 countries and territories. HSG’s company introduction and official updates are available on our website: <https://hoasengroup.vn/en/home/>

HSG exports coated steel products, including products covered by the product group under review by the TRA in this case, including HS code 7210 6100 20. During the review investigation period (1 October 2024 - 30 September 2025), HSG exported to the UK Galvalume coated steel products that are similar in nature to the above scope of goods.

HSG is registering as an interested party in order to make its position known in relation to the possible outcome of the review, provide information in a timely manner when requested by the TRA, and protect HSG’s legitimate interests in case the TRA considers adjusting the scope of the safeguard measure in the form of a tariff rate quota for the HS codes under review.

At the same time, HSG is interested in the outcome of the review because the quota mechanism and the safeguard duty over the quota are applied broadly and may directly affect HSG’s access to the UK market and its future export plans.

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.

During the POI (1 October 2024 - 30 September 2025), HSG produced and exported to the UK metallic coated sheet products, including Galvalume steel. These products are similar in nature to the goods under Category 4 currently under review by the TRA.

[CONFIDENTIAL – Confidential information on company’s production].

[CONFIDENTIAL – Confidential information on company’s capacity].

HSG’s product catalogue and production capability information is available at <https://hoasengroup.vn/en/catalogue/>. It shows HSG’s metallic coated sheet product range, basic technical specifications, applicable standards, and a description of the NOF coating lines capable of producing products under Category 4.

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.

N/A

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.

Please provide supporting evidence, such as procurement process documentation.

N/A

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.



HSG does not have access to internal production data of UK producers to make specific conclusions about production capacity for Category 4 and Category 7. However, based on market conditions and the information in the TRA's notice of initiation, we see clear signs of a shortage of domestic supply, as follows:

- Evidence from the initiation of the review: The fact that ISTA (representing importers) had to submit an application for a review is the strongest evidence. If UK-produced goods could fully replace imports and compete directly (in terms of volume and technical specifications), importers would not have depended on imported supply and would not have needed to request the exclusion of this HS code.
- The fact that the quota is used up quickly shows that demand in the UK exceeds the available supply (including both domestic production and imports within the quota). This indicates a shortage, where imports play an essential supplementary role rather than direct competition aimed at displacing domestic products.
- There is reason to believe that, for the specific HS codes proposed for exclusion, UK domestic supply (if any) is sometimes not enough or does not meet the required technical specifications. As a result, end users are strongly affected when the quota is used up.

Based on this, HSG considers that imports mainly help fill a market gap rather than compete directly with UK products. HSG is ready to cooperate and provide detailed information on its supply capability and product technical specifications to support the TRA's assessment of whether an exclusion is appropriate.

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.

HSG does not have enough public data and has no authority to conclude the level of impact on UK producers of like or directly competing goods if the products under review are excluded from the safeguard measure.

However, according to the TRA's notice of initiation, the review was started based on information showing that the quota is used up quickly and has affected traditional trade flows, and the review request was filed by ISTA on behalf of domestic importers. This suggests that the review aims to ensure suitable supply for the UK market's actual needs for specific HS codes, especially in periods when the quota runs out fast, rather than to allow large inflows that would put pressure on the domestic industry.

From an exporter's perspective, HSG believes that an exclusion (if granted) for a specific HS code would mainly reduce uncertainty and extra costs caused by the quota system, and in turn support the supply chain for downstream companies in the UK. At the same time, given that HSG's exports to the UK for the relevant product group during the POI were limited, HSG does not expect the exclusion to lead to a sudden increase in export volumes into the UK. Therefore, based on an initial exporter view, if there is any impact on UK producers, it would likely be small and limited.

As evidence, HSG does not have access to UK producers' internal data to make a quantitative assessment of injury. However, based on the notice of initiation and the nature of the review request filed by ISTA on behalf of UK importers, where the key argument is that the quota is used up quickly and disrupts traditional trade flows, it can be inferred that there is real demand in the UK for the goods covered by the review, and that the current quota system creates significant difficulties for importers and downstream users. This indicates that considering the exclusion of certain specific HS codes is aimed at easing supply constraints and restoring stable trade flows, rather than reflecting a serious risk of material injury to the UK domestic industry for the HS codes proposed for exclusion.



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



Please refer to [Annex 1](#), containing a detailed submission.

HSG notes and supports the TRA's initiation of the review of the trade safeguard measure in the form of a tariff rate quota on certain steel products imported into the UK, based on the information stated in the notice of initiation regarding the quota being used up quickly and its impact on traditional trade flows.

Within the scope of this review, HSG would like to provide some additional comments, aiming for a balanced benefit for both the UK and legitimate suppliers, as follows:

1. First, HSG requests that the TRA consider excluding HS code 7210 6100 20 from the scope of the safeguard measure in the form of a tariff rate quota. HSG's request and the information provided in this submission focus only on the above HS code, and are not intended to request an exclusion for any other product groups outside the scope of this HS code.
2. Second, if the exclusion is approved, it could be a win-win solution for the relevant parties. For the UK, excluding this HS code could help the market access a more stable supply, reduce the risk of disruption when the quota is used up quickly, and support importers and downstream industries in planning purchases, production, and project delivery on schedule. For manufacturers and exporters such as HSG, the exclusion would allow trade to operate under normal market conditions, reduce uncertainty in transactions, and thereby meet UK customers' demand in a more stable and transparent way.
3. Third, HSG would like to emphasize that HSG's exports to the UK for the relevant product group during the POI were modest compared to HSG's total exports to all markets. Therefore, if the requested exclusion is approved, HSG does not expect to create a sudden increase in shipments or disrupt the UK market. HSG's focus is to maintain a stable supply, meet technical requirements, and serve the UK customers' actual demand under market conditions.
4. Fourth, HSG would like to emphasize that for suppliers located far from the UK, such as Vietnam, shipping time is usually more than 60 days, so the current quota system creates a very high risk for trade. Because it is impossible to be sure whether quota will still be available when the goods arrive at the port, both importers and exporters find it difficult to confirm orders.



If the quota is used up, the shipment may be subject to the duty over the quota, which can sharply increase costs and create significant contract risks. In practice, this risk makes it almost impossible to carry out trade in a stable and planned manner. Therefore, considering the exclusion of this specific HS code would be a practical solution to reduce uncertainty, help parties plan supply more reliably, and allow the supply chain to operate normally under market conditions.

5. Fifth, HSG is ready to cooperate and provide all necessary information, supporting documents, and annexes as requested by the TRA during the review process.