



Trade Remedies
Authority

Tariff Rate Quota Review

Case TQ0078

Statement of Intended Final Determination

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Section A: Summary

A1. Introduction

1. This tariff rate quota (TRQ) review concerns the safeguard measure applying to category 12A steel products. The [Notice of Initiation](#) (NOI) was published on 14 January 2026. The scope of the goods subject to review is defined in section C2.2 Goods Subject to Review.
2. This Statement of Intended Final Determination (SIFD) sets out a summary of the facts that the Trade Remedies Authority (TRA) considered during this TRQ review, and upon which it has based its Intended Final Determination, in accordance with regulation 29(1)(a) of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (as amended) (the Safeguard Regulations). It should be read in conjunction with other documents available for this case on [the public file](#).
3. Parties are invited to make comments in response to the SIFD via the [Trade Remedies Service](#) (TRS) by 23:59 UK time on 23 February 2026. Please contact TQ0078@traderemedies.gov.uk if you have any difficulties using this service.
4. We may consider comments made after this date, but we are not obliged to do so if we consider this would significantly impede the progress of the investigation. Where we reject information for any reason, we will publish our reasons for rejection in our final determination.
5. Anyone requesting that information be treated as confidential must demonstrate why and provide a non-confidential summary of that information, or a statement of reasons why it cannot be summarised. Please contact TQ0078@traderemedies.gov.uk if you cannot provide a non-confidential version.
6. For further guidance and information regarding TRQ reviews, please see our [public guidance concerning reviews of safeguard measures](#).

A2. Legal framework

7. This SIFD is made pursuant to regulations 29 and 36(4A) of the Safeguard Regulations. It sets out:
- the final determination that the TRA intends to make (“intended final determination”);
 - a summary of the facts considered during the review; and
 - those facts that formed the basis of the intended final determination.

A3. About this review

8. This is a TRQ review of a trade remedy measure under regulation 35B of the Safeguard Regulations. As per regulation 35B(1) of the Safeguard Regulations, the TRA may conduct a TRQ review where it is satisfied that there is sufficient information indicating that there may have been a change of circumstance since the application of the tariff rate quota.
9. On 14 January 2026, the TRA initiated this TRQ review following receipt of an application submitted by the Confederation of British Metalforming (the CBM). This application included information indicating that there may have been a change of circumstances which corresponds with the provisions in regulation 35B(9) of the Safeguard Regulations, namely the impact of the tariff rate quota on traditional trade flows, and that UK production of certain goods like those covered by category 12A has ceased.
10. The Period of Investigation (POI) for the review to assess the change in circumstances is 1 October 2024 to 30 September 2025. The representative period for assessing traditional trade flows is the period of 1 July 2017 to 30 June 2018.

Section B: Background and initiation

B1. Summary and initiation

11. Details of the measure currently imposed, including the tariff rate quotas, are set out in:
 - [Trade remedies notice 2025/12: Safeguarding measure: tariff-rate quota on steel goods](#)
12. The TRA received a TRQ review application relating to Category 12A of the steel safeguards measure from the CBM (a UK trade association of importers and users of the goods subject to review) alleging there has been a change in circumstances since the application of the TRQ. The TRA then assessed that the application contained sufficient evidence indicating that there may have been a change in circumstances since the application of the TRQ to category 12A to justify initiating a TRQ review, in accordance with Regulation 35B(1) of the Safeguard Regulations.
13. This TRQ review has considered whether the tariff rate quota to which certain steel products are subject should be varied. The goods subject to review is defined in section C2.2 Goods Subject to Review.

B2. Interested parties and contributors

14. When the TRA initiated this TRQ review, it provided an opportunity for parties to register their interest and provide comments. A list of registered interested parties and contributors are set out in this table:

Table 1: Interested parties and contributors registered to the review TQ0078

Name	Abbreviation	Category	Submission
The Confederation of British Metalforming	The CBM	Applicant / Trade Association	Application
British Steel Ltd	British Steel	Domestic producer of like or directly competitive goods	Registration of Interest
Specialty Steel UK Ltd	SSUK	Domestic producer of like or directly competitive goods	Registration of Interest
7 Steel (UK) Limited	7 Steel	Domestic producer of like or directly competitive goods	Registration of Interest
Bright Steels Limited	Bright Steels	Importer of the goods subject to review	Registration of Interest
Chapmans Agricultural Limited	Chapmans Agricultural	Importer of the goods subject to review	Registration of Interest
Cooper & Turner Limited	Cooper and Turner	Importer of the goods subject to review	Registration of Interest
Garton Limited	Garton	Importer of the goods subject to review	Registration of Interest
Solid Swivel Company Limited	Solid Swivel Ltd	Importer of the goods subject to review	Registration of Interest
Tinslet Bridge Limited	Tinsley Bridge	Importer of the goods subject to review	Registration of Interest
Government of the Republic of Korea	Government of the RK	Foreign Government	Registration of Interest
The Ministry of Trade of Republic of Türkiye	Government of the RT	Foreign Government	Registration of Interest
Ministry of Commerce, India	Government of India	Foreign Government	Registration of Interest
Government of Malaysia	Government of Malaysia	Foreign Government	Registration of Interest
EEF Limited (UK Steel)	UK Steel	Trade Association	Registration of Interest

15. The submissions made to this TRQ review are available on the [public file](#).

Section C: Review Process

C1. Overview

16. To identify whether there had been a change of circumstances since the application of the tariff rate quota to the goods subject to review, the POI was set as 1 October 2024 to 30 September 2025. This is the most recent 12-month period that we have trade data for.
17. By conducting the analysis over a 12-month period, the TRA was able to identify representative trade patterns for the products in scope and minimise distortions based on fluctuations of trade at different times of the year. Where relevant we have also conducted analysis on a quarterly basis during the POI, including when we account for the variation of the measure in July 2025.

C2. Scope

C2.1 Countries

18. This review considers imports from all countries subject to the safeguard measure as well as those from developing countries who currently are excepted from the safeguard measure.
19. Developing country members of the WTO are listed in **Annex 2**.

C2.2 Goods Subject to Review

20. 'Goods subject to review' is defined in regulation 2 of the Safeguard Regulations as 'the goods described in the notice of initiation of a review'.
21. The goods subject to review in this TRQ review are:
 - Category 12A – Alloy merchant bars and light sections
22. The applicant has requested that a TRQ review considers all commodity codes currently included in the scope of the category 12A TRQ. Specifically, it has requested in its application that all commodity codes "*for which there is no current viable domestic production capable of genuinely and sustainably supporting downstream UK metal manufacturers*" be removed from the scope of category 12A of the safeguard measure. These specific commodity codes are stated in the application of the CBM.
23. The commodity codes requested for review by the applicant are listed in **Annex 3**.

C3. Summary of facts considered

C3.1 HMRC data

24. To analyse trade flows in this TRQ review prior to initiation, we have used 8-digit trade data sourced from His Majesty's Revenue and Customs (HMRC).
25. The dataset used in this review is country of origin data for all imports. Country of origin data provides a more accurate picture of where imports are coming from than country of dispatch data. HMRC published country of origin 8-digit bulk datasets can be accessed [here](#).

C3.2 Comments

26. Following initiation of this review, parties were provided with an opportunity to provide comments on the review. All comments were reviewed by the TRA. The non-confidential versions of the registration forms and submissions that are material to this review can be found on the [public file](#).

C3.3 Other

27. Other sources of information which the TRA has used in this review are referred to in the appropriate sections.

Section D: Change in circumstances

D1. Background

28. In conducting a TRQ review, the TRA must determine whether there has been a change in circumstances since the application of the relevant tariff rate quota (see regulation 35B(6)(b) of the Safeguard Regulations). Regulation 35B(9) of the Safeguard Regulations states a non-exhaustive list of what a change of circumstances may be. The NOI for this review states that this review will consider if there has been a change in circumstances with regard to:
- the impact of the tariff rate quota on traditional trade flows;
 - if UK production of certain goods like those covered by category 12A has ceased.
29. A summary of the change in circumstances that was found in this review is set out in the following section. Change due to the impact of the TRQ on traditional trade flows has been addressed in Section D2.1 and change due to the ceasing of production of certain goods is addressed in section D2.2.

D2. Assessment of change in circumstances

D2.1 Change due to the impact of the TRQ on traditional trade flows

30. The CBM has referenced that its members' import trading behaviour for category 12A products has been impacted by the tariff rate quota following its imposition in July 2018, particularly due to category 12 products being split into categories 12A and 12B in 2022 and changes to the application of the tariff rate quotas in July 2025. The CBM has stated that these changes in particular led to its members changing importing behaviour to reduce the risk of incurring the out-of-quota safeguard measure.
31. The case team has gathered data from HMRC and Global Trade Tracker (GTT) to substantiate whether there have been changes to trade flows of the product category 12A since the TRQ was applied. This compared the import flows from the year prior to the application of the TRQ measure, specifically from 1 July 2017 to 31 June 2018, to the most recent available annual period for import data (1 October 2024 to 30 September 2025).

Table 2: Category 12A products product import volume prior to the TRQ and during the POI

Country of origin (by volume in 2017/18)	June 2017 – July 2018 (import volume, metric tonnes)	POI [October 2024 – September 2025] (import volume, metric tonnes)	Difference (metric tonnes)	Percent change
Sweden	13,682.181	4,619.424	-9,062.757	-66.24%
Italy	7,957.116	5,510.974	-2,446.142	-30.74%
Finland	6,044.981	3,014.195	-3,030.786	-50.14%
Germany	5,798.465	1,870.320	-3,928.145	-67.74%
Czechia	4,789.316	851.343	-3,937.973	-82.22%
France	4,014.478	2,151.931	-1,862.547	-46.40%
Poland	4,013.055	9,953.277	5,940.222	148.02%
Spain	4,004.623	59,361.040	55,356.417	1382.31%
All other countries	7,858.057	6,676.995	-1,181.062	-15.03%
Total	58,162.272	94,009.499	35,847.227	61.63%

Source: HMRC UK Trade Info

32. This data shows that the trade flows of the product category have changed since 2017/18. Total import volume has massively increased, led by a significant increase in the quantity of goods imported from Spain and Poland, while imports from nearly all other sources have decreased significantly.
33. This impact on traditional trade flows satisfies the criteria for a change in circumstances in Category 12A as defined in regulation 35B(9)(e) of the Regulations.

D2.2 Changes in domestic supply of certain goods like those in scope of Category 12A

34. In its submission, the applicant has stated that:

“UK production of the concerned products has dramatically reduced to the extent that there is no viable domestic supply to meet the requirements of CBM members’ production.”

35. The applicant’s arguments are primarily based around the status of Speciality Steel UK (SSUK), part of the Liberty Steel group. The application states that in 2025 the SSUK steel mill in Rotherham ceased production of certain goods like those in scope of category 12A. The applicant has also alleged that SSUK has placed conditions on the manufacture of certain goods, like those in scope of category 12A, which downstream

users have deemed unrealistic. The applicant states these are conditions such as minimum order amounts, advanced payment, and no clarity over lead times, complicating any efforts to maintain domestic production of category 12A products. The applicant links these changes to the ongoing financial difficulties of SSUK.

36. The applicant has stated that SSUK has been subject to insolvency proceedings during 2025. It notes that evidence submitted as part of these proceedings indicates that SSUK's Rotherham facility is currently mothballed and most of its personnel are on long-term furlough. In August 2025, the High Court assessed that there was no realistic potential for either refinancing of SSUK or its purchase by a viable buyer. The Court granted a winding up order to Liberty group creditors with an Official Receiver being appointed to liquidate the company and determine what steps to take in management of its assets, including the Rotherham steel mill.
37. The applicant alleges that, in the absence of a viable buyer for the company, the Rotherham site is unlikely to restart production of category 12A like products, especially before the safeguard measure is set to expire on 30 June 2026.
38. SSUK has registered as an interested party and has stated that "*Speciality Steel UK is a producer of the goods in scope of this review*". It has stated which commodity codes it is capable of producing and at which sites, but it has not provided any evidence to support its statements. It also has not addressed the allegation in the application that the Rotherham site has been mothballed or that most of its personnel are on long-term furlough.
39. Several downstream importers such as Tinsley Bridge and Cooper and Turner have registered to the case and stated that they have attempted to procure category 12A products during the POI from SSUK and been unsuccessful. None of the interested parties registered to this review have reported being able to purchase category 12A goods from SSUK during the POI or in the period after the POI.
40. The TRA has identified publicly available information that supports the applicant's allegation that production of category 12A goods at the SSUK Rotherham site has stopped. It has identified parliamentary debates,¹ articles from major news outlets,² and

¹ [Speciality Steel UK: Insolvency, Volume 772: debated on Tuesday 2 September 2025](#), accessed 09/02/2026

² [UK's third-largest steelworks collapses into government control](#), BBC News; [UK court orders liquidation of Liberty Steel's specialty steelmaker SSUK](#), S&P Global, and [Liberty Steel has not produced anything at two key plants since July 2024](#), The Guardian, accessed 09/02/2026

news updates from the Liberty Steel Group³ that SSUK has received a winding up order from insolvency courts and SSUK has been forced to liquidate. These sources also have stated that no products have been produced at the Rotherham site since July 2024 and personnel are on furlough.

41. We believe there is sufficient information indicating that there has been a change of circumstance as the supply of domestic production of goods like those subject to the Category 12A TRQ has changed significantly following the mothballing of the SSUK Rotherham site. We consider this to be a change in circumstance despite it not being one of the non-exhaustive list of changes in circumstances mentioned in regulation 35B(9) of the Safeguard Regulations. We have evidence that the Rotherham site was the only production facility in the UK capable of producing several commodity codes of category 12A products, so the temporary closure of production limits the availability of domestically produced category 12A products to the UK market.

³ [Update on Speciality Steel U.K. Situation](#), accessed 09/02/2026

Section E: Consideration of if the TRQ for category 12A should be maintained, varied or revoked

E1. Background

42. When this case initiated, parties were asked to comment on the request by the applicant to vary the safeguard measure by removing certain products from product category 12A. Parties were also invited to answer questions concerning the domestic production of category 12A goods, imports of the goods subject to review, whether directly competitive goods are produced in the UK, and the likelihood of serious injury if the safeguard measure was varied.
43. In its application, the CBM requests:
- A review of all commodity codes within the existing safeguard measure on category 12A goods, which are:
 - 7228 3020 00
 - 7228 3041 00
 - 7228 3061 00
 - 7228 3069 00
 - 7228 3070 00
 - 7228 3089 00
 - 7228 6020 00
 - 7228 7010 00
44. Several registered interested parties have provided submissions that oppose the applicant's requests to vary the safeguard measure. The interested parties SSUK and British Steel state that they have the capability to produce certain category 12A goods captured by the commodity codes listed above. SSUK has stated that "*Removal or reduction of safeguarding could see subsidised and excess steel being diverted to the UK*".
45. TSUK has also argued that the quota utilisation of category 12A is low, stating that "*at present this quota isn't being fully utilised*".

46. 7 Steel UK stated that they are not producers of category 12A grades, but that they do produce products which fall within category 12B. It has argued that there is a significant risk of misclassification of goods at the border because of the difficulty in distinguishing between alloy (category 12A) and non-alloy (category 12B) products, stating that *“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).”* This allegedly increases the risk that category 12B goods are misclassified as category 12A products to access the historically less utilised category 12A TRQ.
47. 7 Steel have also stated that removing commodity codes from category 12A would mean *“imported goods will be falsely classified to avoid the quota system”* and that *“the sales prospects of former LSS assets will be damaged in the event of any change to the safeguard mechanism”*.
48. The TRA has therefore considered the following to determine whether it should recommend maintaining, varying or, if there is sufficient evidence that UK producers have ceased all production of category 12A goods, revoking of the category 12A tariff rate quota:
- Whether like or directly competitive goods captured by the following commodity codes are produced in the UK:
 - 7228 3020 00
 - 7228 3041 00
 - 7228 3061 00
 - 7228 3069 00
 - 7228 3070 00
 - 7228 3089 00
 - 7228 6020 00
 - 7228 7010 00
 - Whether the removal of the measure on category 12A goods presents a risk of circumvention would increase the likelihood of serious injury to UK producers of category 12B goods through circumvention of the safeguard measure.

- Whether historic tariff rate quota usage indicates that the UK is unduly restricted from importing goods subject to review in sufficient quantity to meet the needs of the UK market.

E2. Consideration of parties' comments

E2.1 Removal of commodity codes from category 12A

49. The TRA has conducted a like and directly competitive goods assessment of all goods subject to the category 12A TRQ commodity codes, which are:
- 7228 3020 00
 - 7228 3041 00
 - 7228 3061 00
 - 7228 3069 00
 - 7228 3070 00
 - 7228 3089 00
 - 7228 6020 00
 - 7228 7010 00
50. This assessment identified that the following three steel producing UK companies registered interest to the review:
- British Steel
 - SSUK
 - 7 Steel
51. British Steel has stated that it produces or has the capacity to produce certain products in Category 12A. To support this claim, it submitted additional evidence in the form of invoices and extracts from its sales account records showing production of the goods over the past four years (including 2026).
52. SSUK states that it is a producer of the goods within Category 12A. It has commented on its capacity to produce goods like those imported goods subject to several commodity codes but has not claimed that production is ongoing or provided supporting evidence of ongoing production.

53. The applicant has stated that “on 21st August 2025 the High Court assessed that there was no realistic potential for either the refinancing of LSS UK [i.e., SSUK] or its purchase by a viable buyer”. The applicant has stated that “LSS UK’s Rotherham mill had been mothballed, with production facilities deteriorating rapidly, and that most of the skilled workforce had been on long-term furlough”. The Rotherham site was a key site used in the production of category 12A products, and this indicates that SSUK does not have ongoing production of category 12A goods and is unlikely to restart production prior to the expiration of the safeguard measure in July 2026.
54. Several registered parties have stated that they have attempted to purchase category 12A products from SSUK, including Solid Swivel Ltd, Cooper and Turner, and Tinsley Bridge. All downstream users of category 12A goods registered to this review have stated that they were unsuccessful procuring any category 12A products from SSUK during the POI, further indicating that production is not ongoing.
55. The TRA has identified publicly available information that supports the applicant’s allegation that production of category 12A goods at the SSUK Rotherham site has stopped. It has identified parliamentary debates,⁴ articles from major news outlets,⁵ and news updates from the Liberty Steel Group.⁶ These sources state that SSUK has received a winding up order from insolvency courts, SSUK has been forced to liquidate, that no products have been produced at the Rotherham site since July 2024, while the site’s personnel are on furlough.
56. The TRA has therefore concluded that SSUK has the production facilities to produce several goods that meet the criteria of commodity codes in category 12A but is not currently producing these goods and is unlikely to resume production prior to the safeguard measure expiry on 30 June 2026.
57. 7 Steel UK stated that they are not producers of category 12A grades, but that they do produce goods captured within category 12B.
58. The TRA has concluded that it has sufficient evidence of UK production of goods like those imported goods captured by the commodity codes 7228 3089 and 7228 7010.

⁴ [Speciality Steel UK: Insolvency, Volume 772: debated on Tuesday 2 September 2025](#), accessed 09/02/2026

⁵ [UK’s third-largest steelworks collapses into government control](#), BBC News, [UK court orders liquidation of Liberty Steel’s specialty steelmaker SSUK](#), S&P Global, and [Liberty Steel has not produced anything at two key plants since July 2024](#), The Guardian, accessed 09/02/2026

⁶ [Update on Speciality Steel U.K. Situation](#), accessed 09/02/2026

59. We have therefore determined that there is sufficient evidence that UK producers have not ceased production of category 12A goods, and we therefore do not have the legal power to revoke the TRQ for category 12A.
60. The submissions made by the applicant and 7 Steel highlight the similarities between goods subject to categories 12A and 12B. The TRA has therefore conducted further analysis to consider the physical and commercial similarities between category 12A and 12B goods.
61. Concerning physical likeness, the TRA notes several submissions from interested parties who state that there are sufficient physical differences between categories 12A and 12B goods that these products are not substitutable. For instance, Garton Ltd states that for its end use the “*specification of the grade 12A steel must conform to ISO 898.1 (2013), and alternatives are not acceptable*”, and Solid Swivel Ltd state that it requires grade U3 product and that “*category 12A material cannot be substituted as it technically specified by the customer*”.
62. The TRA has also considered the commercial likeness of category 12A and 12B products.
63. Submissions from the CBM and its members state that category 12A goods are used within performance-critical applications in sectors including aerospace, automotive, engineering, defence, and energy infrastructure. These applications require specific mechanical properties derived from alloy composition, as well as consistent quality and certification.
64. By contrast, the CBM states that category 12B goods are used in high-volume, less performance-critical applications, most notably in construction. Those goods do not provide the mechanical characteristics required for category 12A end uses and cannot be substituted without product redesign, requalification and customer approval. These statements are supported by other downstream users of category 12A products, such as Garton Ltd and Tinsley Bridge, who have stated that they require the material characteristics of category 12A products and could not substitute these goods for alternative goods falling under category 12B.
65. The TRA notes that the similarities between these goods could lead to misclassification of category 12A goods as category 12B goods, or vice versa. For instance, 7 Steel have stated that the category 12B goods it produces are “*in all visible aspects (cross section*

dimensions and lengths, surface aspects), are exactly the same as alloy merchant bars". The applicant has also stated that "*Category 12A is vulnerable to significant surges in quota claims, due to customs authorities recoding non-alloy steel [i.e., category 12B goods] to Category 12A tariff codes*". This indicates that if the TRQ for category 12A was varied it would create a risk that importers could misclassify non-alloy merchant bars as alloy merchant bars and circumvent the safeguard measure as applied to category 12B steel products.

66. The TRA has acknowledged this risk and continue to work closely with colleagues in HMRC and the Department for Business and Trade (DBT) to ensure that HMRC are aware of the risk of circumvention of the safeguard measure. We note that misclassification is unlawful and HMRC runs compliance checks of imported category 12A and 12B goods to identify instances of misclassification.
67. The TRA has concluded that there are certain unique physical and commercial specifications to which category 12A products must conform, and therefore category 12B products are not directly competitive goods. The submissions made by the UK industry do not contradict this conclusion.
68. The concern raised by interested parties, regarding the risk of misclassification of category 12B goods as category 12A goods at the UK border, is considered a challenge of enforcement rather than a matter of physical composition of the goods making them sufficiently alike, given the fundamental differences in material composition between the goods subject to these two product categories.
69. The TRA has also considered the quota utilisation of the category 12A TRQ during the POI, to assess whether the amount of quota is appropriate for domestic market conditions.

Table 3: Quota Utilisation rates of category 12A during POI

	Q2 (Oct 2024-Dec2024)			Q3 (Jan 2025-Mar 2025)			Q4 (Apr 2025-June 2025)			Q1 (July 2025-Sep 2025)		
Country	Quota available (MT)	Quota used (MT)	Utilisation rate	Quota available (MT)	Quota used (MT)	Utilisation rate	Quota available (MT)	Quota used (MT)	Utilisation rate	Quota available (MT)	Quota used (MT)	Utilisation rate
EU	37,799	22,899	61%	42,941	29,370	68%	42,739	18,463	43%	29,517	12,763	43%
Residual	8,211	806	10%	11,553	750	6%	14,999	209	1%	4,246	548	13%
Total	46,010	23,704	52%	54,494	30,121	55%	57,737	18,672	32%	33,763	13,311	39%

70. Table 3 shows the quota utilisation rate. To calculate these values, we have used the UK Integrated Online Tariff system.

^{7,8} Quota availability is calculated from the available balance at the start of a quarter plus any unused balance carried forward from the previous quarter. Quota used is calculated by subtracting the balance remaining at the end of the quarter from the quota available.⁹ Finally, we calculate utilisation by presenting the quota used as a share of the quota available.

71. Across the POI, the utilisation rate of the EU quota ranged from 43% to 68%. The rate was highest in the Q2 and then declined, remaining stable at around 43% in Q4 and Q1.

72. Utilisation rate for the residual quota was consistently low throughout the POI, ranging from 1% to 13%, and the residual quota was not exhausted in any quarter. The rate was lowest in the Q4 but increased to 13% in final quarter of the POI.

⁷ [UK Integrated Online Tariff quota tool](#), accessed 09/02/2026

⁸ In our analysis we identified some inconsistencies in the UKIOT data, we have addressed these with HMRC internal data.

⁹ Unused quota balances were no longer carried forward from June 2025 onwards, this only affects Q1 in the above table.

73. This data shows that at most only 55% of the category 12A tariff rate quota per quarter was utilised during the POI and no part of the quota was fully utilised during the POI. We have therefore concluded that the safeguard measure is appropriate to allow downstream users of category 12A products to purchase imports without a significant risk of incurring the out-of-quota safeguarding duty, and therefore the amount of tariff rate quota is appropriate for domestic market conditions.

Section F: Conclusion and Intended Final Determination

F1. Conclusion of this review

74. In accordance with regulation 35B(6)(b) of the Safeguard Regulations, the TRA considered whether there has been a change in circumstances, as defined in regulation 35B(9) of the Safeguard Regulations, since the application of the TRQ.
75. We found evidence of the TRQ impacting traditional trade flows of category 12A goods. We have therefore concluded that there has been a change in circumstance in accordance with regulation 35B(9)(e) of the Safeguard Regulations.
76. We have also found there is sufficient information indicating that there has been an additional change of circumstance following the mothballing of SSUK's Rotherham site. We consider this to be a change in circumstance despite it not being one of the changes cited within the non-exhaustive list in regulation 35B(9) of the Safeguard Regulations. The evidence received by the TRA indicates that the Rotherham site was the only facility in the UK capable of producing several category 12A commodity codes. Its temporary closure therefore significantly affects the availability of domestically produced category 12A products to the UK market.
77. Therefore, we have determined that there has been a change in circumstances since the application of the tariff rate quota, in accordance with regulation 35B(6)(b) of the Safeguard Regulations.
78. In accordance with regulation 35B(6)(c)(i) of the Safeguard Regulations, we decided to further consider whether the TRQ is appropriate for the domestic market conditions. We concluded that the amount of quota is appropriate for domestic market conditions, as the quota allows downstream users of category 12A products to import category 12A products without significant risk of incurring the out-of-quota safeguarding duty.
79. In accordance with regulation 35B(6)(c)(iii) of the Safeguard Regulations, the TRA exercised its discretion to consider other factors it considered relevant. Specifically, we considered whether the allocation of the tariff rate quota is suitable and whether it should be reallocated so as to remove any commodity codes from the safeguarding measure for category 12A for which there is no current viable domestic production capable of genuinely and sustainably supporting downstream UK metal manufacturers.

80. The TRA has concluded that it has sufficient evidence of UK production of category 12A goods as defined by the commodity codes 7228 3089 00 and 7228 7010 00. Based on this, we have concluded that there is sufficient evidence that UK producers have not ceased production of all category 12A goods so we cannot recommend revocation of the TRQ for category 12A, and that these two commodity codes should be maintained in category 12A.
81. We have found that the only registered organisation that has claimed the capacity to produce three of the commodity codes in category 12A was SSUK. We have concluded, based on evidence submitted and publicly available information, that it is likely there was no production of category 12A products by SSUK during the POI.
82. We have also found that no registered party has claimed to produce a further three commodity codes in category 12A.
83. No party has presented evidence that any category 12A goods produced in the UK are directly competitive with the imports of any of the six commodity codes in category 12A that were not produced in the UK during the POI.

F2. Intended final determination

84. For the reasons set out already in this document, and pursuant to 35B(7)(b) of the Safeguard Regulations, the TRA's intended final determination and recommendation is to vary the tariff rate quota.
85. Paragraph 21(9) of Schedule 5 to the Taxation (Cross-border Trade) Act 2018 (the Act) lists the forms a variation of a TRQ that the TRA may recommend to the Secretary of State. We intend to recommend a varying of the allocation of the quota such that it applies only to category 12A goods produced in the UK during the POI, in accordance with paragraph 21(9)(b) of Schedule 5 to the Act. In particular, we intend to recommend the following:
 - (i) the measure should be varied to no longer allocate imports of the following commodity codes to the TRQ for category 12A:
 - 7228 3041 00
 - 7228 3061 00
 - 7228 3069 00

- 7228 3020 00
- 7228 3070 00
- 7228 6020 00

(ii) the safeguard measure should be varied to only allocate imports of the following commodity codes to the TRQ for category 12A:

- 7228 3089 00
- 7228 7010 00

Annex 1: FTA partners with a current safeguard exception

Agreement	Multilateral safeguard exception
UK – Kenya	Active
UK-CARIFORUM EPA (Antigua and Barbuda, Barbados, Belize, the Bahamas ¹⁰ , Dominica, The Dominican Republic, Grenada, Guyana, Jamaica, Saint Christopher (Kitts) and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Suriname, and Trinidad and Tobago)	Active
SACUM-UK EPA.	Active

¹⁰ Not on the WTO Developing Country list

Annex 2: Developing country members of the WTO¹¹

Afghanistan, Albania, Angola, Antigua and Barbuda, Argentina, Armenia, Bahrain, Bangladesh, Barbados, Belize, Benin, Bolivia, Botswana, Brazil, Brunei Darussalam, Burkina Faso, Burundi, Cabo Verde, Cambodia, Cameroon, Central African Republic, Chad, Chile, Chinese Taipei, Colombia, Comoros, Congo, Costa Rica, Côte d'Ivoire, Cuba, Democratic Republic of the Congo, Djibouti, Dominica, Dominican Republic, Ecuador, Egypt, El Salvador, Eswatini, Fiji, Gabon, Gambia, Georgia, Ghana, Grenada, Guatemala, Guinea, Guinea-Bissau, Guyana, Haiti, Honduras, Hong Kong, India, Indonesia, Israel, Jamaica, Jordan, Kazakhstan, Kenya, Korea, Republic of., Kuwait, Kyrgyz Republic, Lao People's Democratic Republic, Lesotho, Liberia, Macao, Madagascar, Malawi, Malaysia, Maldives, Mali, Mauritania, Mauritius, Mexico, Moldova, Mongolia, Montenegro, Morocco, Mozambique, Myanmar, Namibia, Nepal, Nicaragua, Niger, Nigeria, North Macedonia, Oman, Pakistan, Panama, Papua New Guinea, Paraguay, Peru, Philippines, PRC,¹² Qatar, Rwanda, Saint Christopher (Kitts) and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, Saudi Arabia, Senegal, Seychelles, Sierra Leone, Singapore, Solomon Islands, South Africa, Sri Lanka, Suriname, Tajikistan, Tanzania, Thailand, Timor-Leste, Togo, Tonga, Trinidad and Tobago, Tunisia, Türkiye, Uganda, Ukraine, UAE, Uruguay, Vanuatu, Venezuela, Vietnam, Yemen, Zambia, Zimbabwe.

¹¹ Some of the below countries have been excluded from the calculation because of the FTA/EPA agreements listed in Annex 1

¹² Please note that [the PRC has announced in September 2025](#) that “as a responsible major developing country, China will not seek new special and differential treatment in the current and future WTO negotiations.” It has not affected the status of the PRC as a developing country member in the WTO.

Annex 3: Commodity codes requested for review in the application

Product Number	Product Category	Commodity Codes
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

Annex 4: Intended update to the list of commodity codes for TRQ allocation Recommended varied definition re of category 12A

Product Number	Product Category	Commodity Codes
12A	Alloy merchant bars and light sections	7228 3089 00 7228 7010 00

Annex 5: Tariff Rate Quotas of categories 12A and 12B

Quarterly volumes of country and residual tariff-rate quotas (in tonnes) 01/07/25 – 30/06/26

Product category	Country	01/07/2025 to 30/09/2025	01/10/2025 to 31/12/2025	01/01/2026 to 31/03/2026	01/04/2026 to 30/06/2026
12A	EU	30,373	30,373	29,713	30,043
	Residual	4,369	4,369	4,274	4,321
	Total	34,742	34,742	33,987	34,364
12B	EU	36,485	36,485	35,692	36,089
	Türkiye	13,733	13,733	13,434	13,583
	Residual	7,804	7,804	7,634	7,719
	Total	58,022	58,022	56,760	57,391