[redacted]

From:	TF0006 <tf0006@traderemedies.gov.uk>
Sent:	22 June 2021 11:59
To:	[redacted]
Subject:	RE: TF0006: Turkey's exemption for product category 5 (OCS)

External email

Good morning [redacted]

Thank you for your email. Apologies for the delay in responding to it.

The TRA is responsible for monitoring the available data on imports to assess the effectiveness of trade remedy measures.

Where data indicates a change in trade patterns, including those of developing countries either exempted or not exempted from the measure, this could lead to further enquiry which may include a Tariff Rate Quota Review.

I hope this helps.

Kind regards,

[redacted]

Trade Remedies Authority

[redacted]
Trade Remedies Authority |
North Gate House | 21-23 Valpy Street | Reading RG1 1AF |
gov.uk/uktra | TRA Twitter | TRA LinkedIn |

From: [redacted]
Sent: 15 June 2021 19:13
To: TF0006 <tf0006@traderemedies.gov.uk>
Subject: TF0006: Turkey's exemption for product category 5 (OCS)

Dear case team,

I am contacting you concerning the TRA's recommendation to exempt Turkey from the safeguard measures applicable to product category 5 (Organic Coated Sheets – OCS) as a developing country with an import share of less than 3%.

While I understand that the above-mentioned exemption is legally justified, Tata Steel UK as the major producer of OCS in the UK has serious concerns around a possible spike in imports of this product from Turkey in the near future. According to the OCS market intelligence, Turkish OCS lines are not only modern and competitive, but also currently underutilized. This is due to the fact that Turkish producers focus on export sales of HDG, as they are more profitable. However, since the EU has recently initiated an anti-dumping investigation concerning HDG imports from Turkey, Turkish producers are likely to switch HDG production to OCS, which will increase OCS supply and competition in Turkey's export markets. This is especially relevant for the UK as Turkish producers of OCS will not be subject to the safeguard measures in the UK market.

In the previous years, such threats were addressed by the European Commission through regular reviews of the list of developing countries benefiting from an exemption. Indeed, according to recital 192 of the Commission Implementing Regulation 2015/159 imposing definitive safeguard measures, the Commission undertook to carry out an assessment of the situation around imports from developing countries at least at the end of each year of imposition of measures. Since this issue seems not to be addressed in the TRA's Recommendation to the Secretary of State, it is unclear if the TRA will adopt a similar approach with respect to developing countries exceeding the 3% threshold. In view of this, I would be grateful if you could clarify the following:

- Will the TRA review the list of exemptions on a regular basis in order to assess whether developing countries exceed the 3% threshold?
- If so, will the TRA itself monitor the situation around increasing imports from developing countries benefiting from an exemption from the safeguard measures or should it be done by the domestic industry?

I remain available to provide any further information on this matter if need be.

Thank you.

[redacted]

[redacted]

[redacted]

[redacted]

Sensitivity: general