03/15/2022

**United Kingdom Safeguard on Steel Products**

**TRQ Review**

**Submission of the Government of Brazil**

The Government of Brazil presents its compliments to the Government of the United Kingdom (UK) and thanks for the opportunity to submit its views on the current tariff rate quota (TRQ) review process by the Trade Remedies Authority's (TRA), which aims to assess the need for modifying the list of developing countries excluded from the safeguard measure on certain steel products.

Article 9.1 of the WTO Agreement on Safeguards determines that “Safeguard measures shall not be applied against a product originating in a developing country Member as long as its share of imports of the product concerned in the importing Member does not exceed 3 per cent, provided that developing country Members with less than 3 per cent import share collectively account for not more than 9 per cent of total imports of the product concerned”.

Brazil analyzed UK’s trade flows for categories 2 and 7 of the safeguard measure (the ones to which Brazilian exports are subject) during the year 2021 (most recent period available) from the UK Trade Info website (<https://www.uktradeinfo.com/trade-data/ots-custom-table/>), in order to verify whether Brazilian exports had fallen within the 3%-threshold, in terms of both value and volume.

According to UK’s trade data, there has been no exports from Brazil in category 7 in 2021. For category 2, UK’s trade data shows that Brazilian exports represented no more than 0.18% in terms of value or 0.08% in terms of volume of total UK imports in 2021. Please find the demonstration of the calculation in Annex 1 below.

In light of the facts above, Brazil respectfully requests that TRA exclude Brazilian exports from the application of the safeguard measure in categories 2 and 7, in accordance with Article 9.1 of the WTO Agreement on Safeguards. Brazil also requests to continue exempted from the remaining categories, under which its exports are still under the “de minimis” threshold.

**Annex 1 - Calculations**

**Calculation:**



**Databases:**

**CATEGORY 2**

**Total UK Imports**



**Imports from Brazil**



**CATEGORY 7**

**Total UK Imports**



**Imports from Brazil**

\* System did not return any entry for this criterion\*