*TRA V6 non confidential*

**THE INTERNATIONAL STEEL TRADE ASSOCIATION**

11th April 2022

**ISTA NON-CONFIDENTIAL SUBMISSION**

**To: The Trade Remedies Authority**

**Tariff Rate Quota Review – SM0019**

**Re: TRQ Allocations for the Russian Federation and the Republic of Belarus**

**Covering steel product categories 1 (non alloy and other alloy hot rolled sheet and strip) and 13 (Rebars)**

ISTA welcomes this opportunity to comment on the proposed measures.

**Basic Premise**

Our basic premise is that demand remains for both the products in question and that UK mills are not able to meet this demand. To ensure the necessary supply to the market during the current war, such steel must be obtained elsewhere. ISTA, supports the TRA position “to vary the TRQs in order to maintain trade flows …”.

**Proposed TRQ Re-allocations**

Members reports that UK imports statistics show that to an appreciable degree the EU is not using its current quota allocation for both categories 1 and 13. ISTA, therefore, believes that the reallocations should only be for the specific non-EU countries and “other countries”.

Members also report that Ukraine is currently unable to export due to the war. Their quotas should also be temporarily redistributed.

**A Consideration**

Whilst welcoming the TRA review, in ISTA’s view there may no longer be a need for safeguard measures. They were introduced in response to US Section 232 measures to ensure that steel that would normally be shipped to America was not diverted to Europe/ the UK. As the 232 tariffs have been removed for exports to the USA from the EU and UK these measures may no longer be required. Anti-dumping measures remain available should it be felt that there is a need to curtail what are deemed to be excessive imports.

ISTA would be happy to discuss this matter further.