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**EUROJURIS
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NON-CONFIDENTIAL VERSION

Safe009R4 - Review concerning the possible extension of the definitive safeguard measure applicable to imports of certain steel products

Dear Madam/Sir,

in the above mentioned matter, EURANIMI – European Association of Non-Integrated Metal Importers & Distributors (hereinafter: EURANIMI) noted with concern that the Commission in its WTO notification of 11 June 2021 has announced its intention to extend the safeguard measure on imports of certain steel products by 3 years.

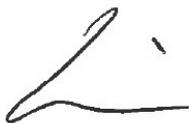
In view of the current market situation, which is characterized by massive supply shortages and extreme price increases, the decision of the Commission is incomprehensible for EURANIMI. For the market participants, who have already suffered from the artificial restriction of imports in the last 3 years, an unchanged extension of the safeguard-measure would amount to a catastrophe. Against this background, EURANIMI had already deman-

ded in its submission of 12 March 2021 a significant adjustment of the safeguard-measure on steel imports, at least significant increases in tariff quotas for product groups for which the quotas are regularly exhausted. This demand is hereby reiterated, as otherwise high damage is to be expected, in particular for the steel processing industry, which will no longer be able to maintain its production in accordance with the needs of the market.

In addition to the above-mentioned general objections, EURANIMI notes that the share of imports relative to domestic production in the period 2018-2020 has substantially decreased and approached the level of 2017.

Therefore, with regard to this decrease of imports – and the decrease of the share of imports relative to domestic production – the conclusion must be drawn that there is no need for an extension of the safeguard measure on imports of steel products. This is all the more true if one takes into account the current market situation in 2021, where EU steel production has picked up significantly and is presumably at an all-time high - so that the EU factories are currently highly profitable and are by no means affected by imports of steel products.

EURANIMI already made reference to this situation in its previous submission and demanded that the latest market developments in 2021 be taken into account when deciding on the extension of the safeguard-measure. EURANIMI hereby emphasizes this demand once again and urgently calls upon the Commission to reconsider its position on the extension of the safeguard measure.



Tim Lieber
Rechtsanwalt

on behalf of EURANIMI – European Association of Non-Integrated Metal Importers & Distributors