

# Proposed approach to steel safeguard reconsideration

## SECTION A: Introduction

1. This document sets out the Secretary of State for International Trade's conclusions and proposed approach based on the Trade Remedies Authority's (TRA's) findings under the steel safeguard reconsideration. It should be read in conjunction with the TRA's Report of Findings and other public documents available for this case on the [public file](#).
2. The review of the transitioned steel safeguard measure was initiated on 1 October 2020. Until June 2021 the UK's trade remedies investigation functions were carried out by the Trade Remedies Investigations Directorate (TRID) as part of the United Kingdom (UK) Department for International Trade (DIT). On 1 June 2021 the TRA was formally and legally established as an independent arm's-length body of DIT. Therefore, although the transition review was initiated by TRID, rather than TRA, for the sake of simplicity and clarity, the report will refer to 'the TRA' to cover all the activities associated to this reconsideration of the transition review, both before and after their establishment as the TRA.
3. For further guidance and information regarding transition reviews and reconsiderations please see the TRA's [public guidance](#).

### A1. Case History

4. On 22 March 2022, under regulation 3(b) of the Trade Remedies (Review and Reconsideration of Transitioned Trade Remedies) Regulations 2022 (S.I. 2022/113) ("the Call-in Regulations") [the Secretary of State for International Trade notified the TRA](#) in writing that, in relation to the Steel Safeguard under reconsideration, she intended to take the decision on whether to vary, maintain or revoke the tariff rate quotas applicable to goods. The Secretary of State for International Trade directed the TRA, pursuant to this, to assist her by:
  - Investigating and analysing the impact of the transitioned trade remedy under reconsideration;
  - gathering and assessing evidence in connection with the impact of the transitioned trade remedy;
  - providing a report to the Secretary of State (in these Regulations referred to as a "Report of Findings") before a date specified by the Secretary of State.
5. In accordance with regulation 4(2)(a)(ii) of the Call In Regulations, the Secretary of State instructed the TRA, on 22 March 2022 to include the following analyses and assessment:
  - The analysis carried out and the conclusions reached on the reconsideration prior to the date of the letter;
  - An assessment as set out in points a-e below of the evidence of the 19 products transitioned from the EU measure ("the transitioned trade remedy") in the 3 steel product category groups set out in annex A ("the family groups");

- A separate assessment as set out in points a-e below of the 10 product categories recommended for extension by the TRA in 2021 in the same family groups;
  - An assessment of the Economic Interest Test (as required under regulation 7(1)(c)(iii) of the Call-in Regulations) for each individual product category; and
  - Proposed Tariff Rate Quotas (TRQ) for each individual product category subject to the reconsideration and to which the measure currently applied.
6. The points of assessment referenced above for the three product families (to be conducted on the basis of both 19 total categories split across the 3 groups, and 10 categories split across the three groups, respectively) were whether:
- a. The goods were imported into the UK in increased quantities and whether this increase was significant;
  - b. The importation of those goods in increased quantities would be likely to recur if they were no longer subject to a tariff rate quota;
  - c. There was serious injury or a threat of serious injury to UK producers;
  - d. Any continuation of a tariff rate quota was necessary at an individual product category level to prevent or remedy serious injury or threat of serious injury to UK producers.
  - e. There was evidence that that the UK producers were adjusting.

## **A2. Aggregation of Steel Products**

7. The TRA's original transition review of the steel safeguard measure was conducted based on the consideration of each of the 19 steel product categories on an individual basis.
8. In applications for a reconsideration, steel producers made the case that the production of steel within the individual categories was not distinct and the product categories, were instead, inherently interconnected. Producers argued that steel products should therefore be considered on an aggregate basis.
9. Given the grounds for the reconsideration, DIT asked the TRA to consider the data in aggregate at industry level and at by product group, so that it could be considered alongside the evidence on individual product categories to be able to determine whether the safeguard should be maintained to prevent or remedy serious injury.
10. There are a range of possible ways in which individual products categories may be linked to one another. These include:
  - Demand substitutability – how easily the products can be substituted for one another from a user perspective.
  - Supply substitutability – the ease with which producers can switch production between the products.

- Common customers – the extent to which changes in demand from a given customer affect more than one product.
- Shared facilities – the extent to which products share production facilities so that injury experienced in one product can affect another product.
- Shared company ownership – where different products are produced by the same company so that injury on one product can impact on multiple products.
- Vertical Integration – the extent to which products are used as inputs in the production of other products.
- Common materials – the extent to which products are produced from the same unprocessed or semi-processed materials.

11. The European Commission (EC), in its original definitive determination of January 2019, stated that it based its analysis of whether safeguards were warranted on a single aggregate group of products. It has since reaffirmed that position.

12. However, responding to arguments put forward by interested parties, and with the aim of confirming the robustness of its aggregate analysis, the EC also examined this single group of products under three different groupings, or “families”: flat products, long products and tubular products.

13. The EC argued that these groupings are commonly used by the steel industry, and that, within each of these families, there is a degree of commonality between product characteristics, that products within each family sometimes share production processes, that products within a family are often an input for other downstream products within the same family or have common users or customers in the supply chain. This, it argued, generates a greater degree of competition within the family group than is present at the aggregate level.

14. DIT considered these arguments and the appropriateness of grouping steel products in this way.

15. Although there is no single grouping of products that satisfies each and every one of the above criteria, the submissions by steel producers are generally supportive of the long/flat/tubes grouping as a logical basis for assessing injury or the threat thereof. The arguments and evidence put forward mainly emphasise linkages between products resulting from the use of common production inputs, common ownership, vertically linked production chains and supply-side interchangeability. Demand side substitutability features less prominently, though there are also linkages via common customers. Collectively these suggest that injury caused to one product will have repercussions on other products within the same group.

16. Although it is possible to conceive of alternative groupings of products, because of the reasoning above, DIT concluded that the grouping of steel products into flats, longs and tubes had sufficient merit to form the basis of assessment of whether the retention of the safeguard would be necessary to prevent or remedy serious injury. In addition, the EU grouped them this way.

## **SECTION B: Department for International Trade and the Secretary of State for International Trade's Conclusions**

### **B1. Consideration of the grounds raised by interested parties**

17. The TRA accepted eight applications for reconsideration, the grounds of which set the scope for ongoing analysis. In addition to these, the TRA received 22 non application submissions and two further responses from interested parties which were all taken into consideration.
18. Over 250 grounds (arguments that were put forward) for analysis were identified in the 8 applications received as part of the reconsideration process. The TRA analysed all grounds individually and identified 10 common themes, as below, into which most grounds could be categorised. An additional category of 'other' was used to capture a small group of grounds that could not be readily assigned to a common theme.
- COVID-19 and the UK's exit from the EU
  - Economic Interest Test (EIT)
  - The publication of the EU safeguards determination\*
  - HMRC vs ISSB data, and the use of Below Threshold Trade Allocations (BTTA)
  - Increase in Imports and Significance Assessment
  - Serious Injury Assessment
  - Interconnectedness
  - Timeframe
  - UK Production
  - Other\*
19. The Secretary of State has taken into account the findings of the TRA against these grounds, as set out in paragraphs 1.4.1 – 1.4.10 of its Report of Findings and **concluded that none of these grounds should be upheld.**

### **B2. Consideration of Aggregated Steel Categories**

20. As set out above, in addition to consideration of the grounds raised by interested parties, the Secretary of State directed the TRA to examine whether:
- a. The goods were imported into the UK in increased quantities and whether this increase was significant;
  - b. The importation of those goods in increased quantities would be likely to recur if they were no longer subject to a tariff rate quota;
  - c. There was serious injury or a threat of serious injury to UK producers;
  - d. Any continuation of a tariff rate quota was necessary at an individual product category level to prevent or remedy serious injury or threat of serious injury to UK producers.

e. There was evidence that that the UK producers were adjusting.

### **B3. Necessity of a TRQ to prevent or remedy serious injury**

21. The Secretary of State has taken into account the TRA's findings in sections 2.1 to 2.4 of the TRA's Report of Findings and concluded that the maintenance of TRQs is necessary to remedy serious injury. The Secretary of State also recognised that adjustments were required to certain TRQ's to better reflect trade flows.
22. As detailed below, several factors have been taken into account in making this overall approach, including the evidence of an increase in imports, the likelihood of a recurrence of imports and the existence of serious injury to UK producers.

#### **B3.1 Increase in Imports**

23. Having taken into account the evidence provided by TRA in its Report of Findings, the Secretary of State has concluded that there is evidence of an increase in imports over the period of investigation for both groups 1 (flat products) and 3 (pipes/tubes) but that there is no evidence of a significant increase in imports for group 2 (long products).
24. The Secretary of State has taken this information into account as part of the overall assessment. However, the Secretary of State does not consider that prior increased imports during the period considered must be established to establish that a safeguard measure is necessary to prevent or remedy serious injury.

#### **B3.2 Likelihood of Recurrence of Imports**

25. In its Report of Findings, the TRA identified indications of serious injury. The Secretary of State has taken into account the Report of Findings and concluded that removal of the steel safeguard measure would likely result in an increase in imports and therefore would result in serious injury or the threat of serious injury to UK steel producers.
26. There is evidence in the TRA's Report of Findings that removal of the measure would likely result in an increase in imports of steel products due to:
  - **Global steel overcapacity** – there will be an oversupply in the international market for steel products under review for the foreseeable future (section 2.2).
  - **Import trends** – The TRA found an ongoing high rate of import volume during the most recent period, including during the introduction of the EU safeguard measure in 2018 and the COVID-19 crisis in 2020. The TRA also found an increase in import volume during the period of investigation and most recent period, relative to domestic production of multiple product categories in each group (section 2.2).
  - **Actions of other authorities** – US steel tariffs imposed in 2018 caused a knock-on effect resulting in numerous other countries introducing trade remedy measures to protect against the diversion of steel products. Were the UK to remove its safeguard, the evidence indicates that the UK would face an increase in diverted steel product imports (section 2.2).

- **Attractive UK market** – actions taken by other authorities reduced their attractiveness and consequently increased the attractiveness of the UK as an export destination for steel products. Not only this, but equivalent countries such as Japan and South Korea experienced import penetration levels than the UK despite the implementation of the EU’s safeguard measure, indicating the UK is a comparatively attractive market (section 2.2).

### **B3.3 Serious Injury or Threat of Serious Injury and Necessity of a TRQ to prevent or remedy serious injury**

27. When investigated at an aggregate level (both at the industry level and at the group level) the Secretary of State concluded that UK steel producers were suffering threat of serious injury and that this would be likely to increase should the safeguard measure be removed. The Secretary of State has taken into account the assessments made throughout section 2.3 of the TRA Report of Findings that, at industry and group level, there were indications of serious injury and threat of serious injury to UK producers for all three steel product category groups.

### **B4. Evidence of UK Producers Adjusting**

28. Having taken into account section 2.5 of the TRA’s Report of Findings, the Secretary of State has concluded that there is sufficient evidence to demonstrate that UK producers have sensible and practical adjustment plans in place and are adjusting to the surge in steel imports, as required under the WTO Safeguards Agreement.

## **SECTION C: Proposal**

29. The Government's proposals are set out below and are made on the basis of the Secretary of State for International Trade's conclusions, as set out in Section B, above.

### **C1. Grounds Raised by Interested Parties**

30. The steel safeguard measure will continue to apply on the following 10 steel categories until 30 June 2024:

- 1 – Non-alloy and other alloy hot-rolled sheet and strip
- 2 – Non-alloy and other alloy cold-rolled sheet
- 4 – Metallic coated sheet
- 5 – Organic coated sheet
- 13 – Rebar
- 19 – Railway material
- 20 – Gas pipe
- 21 – Hollow section
- 25 – Large welded tube
- 26 – Other welded tube

### **C2. Application of the Safeguard to Other Steel Categories**

31. As set out above, the Government extended the measure with effect to a further 5 categories of steel for the period of 1 year. These categories were as follows:

- a. 6 – Tin mill products
- b. 7 – Non-alloy and other alloy quarto plates
- c. 12 – Merchant bars and light sections<sup>1</sup>
- d. 16 – Non-alloy and other alloy wire rod
- e. 17 – Angles, shapes, and sections of iron or non-alloy steel

32. The Secretary of State has concluded that, on the basis of the of the indications identified by the TRA in its Report of Findings there is clear evidence that:

- a. if the measure were discontinued, there would be serious injury or the threat of serious injury to UK producers; and
- b. UK producers are adjusting

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<sup>1</sup> In applying this extension Category 12 was split into 12A (alloy merchant bars and light sections) and 12B (non-alloy merchant bars and light sections)

33. The Secretary of State has also concluded that the retention of the measure for these categories of steel is in the economic interest of the UK.
34. The Secretary of State therefore proposes to extend the measure for a further 2 years (from 1 July 2022 until 30 June 2024) with effect to categories 6, 7, 12, 16 and 17.
35. However, throughout the reconsideration, evidence has been received from importers and downstream users of Category 12 steel products highlighting severe problems with supply of these products and associated increased costs to those businesses. The Secretary of State therefore proposes increasing the annual tariff rate quota on Category 12a to 126,136 tonnes from 1 July 2022 to ensure it better reflects trade flows.
36. The Secretary of State does not propose to reapply the measure to the 4 categories for which the measure was discontinued in 2021 (categories 14, 15, 27 and 28).
37. The full list of proposed TRQs are set out in the next section.



## SECTION D: Proposed Tariff Rate Quotas

Table 1: Quarterly volumes of country and residual tariff-rate quotas (in tonnes) year 1

| Product category | Country     | 01/07/2022 to 30/09/2022 | 01/10/2022 to 31/12/2022 | 01/01/2023 to 31/03/2023 | 01/04/2023 to 30/06/2023 |
|------------------|-------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1                | EU          | 176,722                  | 176,722                  | 172,880                  | 174,801                  |
|                  | Turkey      | 23,203                   | 23,203                   | 22,699                   | 22,951                   |
|                  | Taiwan      | 12,918                   | 12,918                   | 12,637                   | 12,777                   |
|                  | Residual    | 22,233                   | 22,233                   | 21,750                   | 21,991                   |
| 2                | EU          | 76,412                   | 76,412                   | 74,751                   | 75,581                   |
|                  | South Korea | 11,240                   | 11,240                   | 10,996                   | 11,118                   |
|                  | India       | 9,396                    | 9,396                    | 9,192                    | 9,294                    |
|                  | Residual    | 23,844                   | 23,844                   | 23,325                   | 23,584                   |
| 4                | EU          | 305,241                  | 305,241                  | 298,605                  | 301,923                  |
|                  | Taiwan      | 31,558                   | 31,558                   | 30,872                   | 31,215                   |
|                  | India       | 23,307                   | 23,307                   | 22,801                   | 23,054                   |
|                  | Turkey      | 23,242                   | 23,242                   | 22,736                   | 22,989                   |
|                  | Residual    | 80,601                   | 80,601                   | 78,849                   | 79,725                   |
| 5                | EU          | 34,543                   | 34,543                   | 33,792                   | 34,167                   |
|                  | South Korea | 14,037                   | 14,037                   | 13,732                   | 13,884                   |
|                  | Residual    | 2,098                    | 2,098                    | 2,053                    | 2,075                    |
| 6                | EU          | 30,120                   | 30,120                   | 29,465                   | 29,792                   |
|                  | PRC         | 7,647                    | 7,647                    | 7,481                    | 7,564                    |
|                  | Taiwan      | 2,497                    | 2,497                    | 2,443                    | 2,470                    |
|                  | South Korea | 2,370                    | 2,370                    | 2,319                    | 2,344                    |
|                  | Residual    | 1,022                    | 1,022                    | 1,000                    | 1,011                    |
| 7                | EU          | 67,025                   | 67,025                   | 65,568                   | 66,297                   |
|                  | Ukraine     | 10,461                   | 10,461                   | 10,234                   | 10,347                   |
|                  | Residual    | 13,458                   | 13,458                   | 13,165                   | 13,312                   |
| 12A              | EU          | 27,795                   | 27,795                   | 27,191                   | 27,494                   |
|                  | Residual    | 3,998                    | 3,998                    | 3,911                    | 3,954                    |
| 12B              | EU          | 33,389                   | 33,389                   | 32,664                   | 33,026                   |
|                  | Turkey      | 12,567                   | 12,567                   | 12,294                   | 12,431                   |
|                  | Residual    | 7,142                    | 7,142                    | 6,986                    | 7,064                    |
| 13               | EU          | 70,174                   | 70,174                   | 68,648                   | 69,411                   |
|                  | Turkey      | 33,245                   | 33,245                   | 32,522                   | 32,883                   |
|                  | Residual    | 22,635                   | 22,635                   | 22,143                   | 22,389                   |
| 16               | EU          | 70,644                   | 70,644                   | 69,108                   | 69,876                   |
|                  | Residual    | 3,084                    | 3,084                    | 3,017                    | 3,051                    |
| 17               | EU          | 142,481                  | 142,481                  | 139,384                  | 140,933                  |
|                  | Residual    | 35,084                   | 35,084                   | 34,322                   | 34,703                   |

|     |             |        |        |        |        |
|-----|-------------|--------|--------|--------|--------|
| 19  | EU          | 4,517  | 4,517  | 4,419  | 4,468  |
|     | Residual    | 133    | 133    | 130    | 131    |
| 20  | Turkey      | 14,810 | 14,810 | 14,489 | 14,649 |
|     | EU          | 6,666  | 6,666  | 6,521  | 6,593  |
|     | India       | 3,427  | 3,427  | 3,352  | 3,390  |
|     | UAE         | 2,272  | 2,272  | 2,223  | 2,247  |
|     | Residual    | 696    | 696    | 681    | 689    |
| 21  | Turkey      | 35,157 | 35,157 | 34,393 | 34,775 |
|     | EU          | 10,671 | 10,671 | 10,439 | 10,555 |
|     | Residual    | 3,244  | 3,244  | 3,174  | 3,209  |
| 25A | Japan       | 7,794  | 7,794  | 7,624  | 7,709  |
|     | EU          | 5,963  | 5,963  | 5,834  | 5,899  |
|     | South Korea | 1,191  | 1,191  | 1,165  | 1,178  |
|     | Residual    | 2,102  | 2,102  | 2,057  | 2,079  |
| 25B | EU          | 15,339 | 15,339 | 15,006 | 15,173 |
|     | South Korea | 4,409  | 4,409  | 4,313  | 4,361  |
|     | Japan       | 1,932  | 1,932  | 1,890  | 1,911  |
|     | Residual    | 4,650  | 4,650  | 4,549  | 4,600  |
| 26  | EU          | 21,488 | 21,488 | 21,021 | 21,255 |
|     | UAE         | 14,441 | 14,441 | 14,127 | 14,284 |
|     | Turkey      | 10,490 | 10,490 | 10,262 | 10,376 |
|     | PRC         | 5,518  | 5,518  | 5,398  | 5,458  |
|     | Residual    | 9,528  | 9,528  | 9,320  | 9,424  |

**Table 2: Quarterly volumes of country and residual tariff-rate quotas (in tonnes) year 2**

| Product category | Country     | 01/07/2023 to 30/09/2023 | 01/10/2023 to 31/12/2023 | 01/01/2024 to 31/03/2024 | 01/04/2024 to 30/06/2024 |
|------------------|-------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1                | EU          | 181,526                  | 181,526                  | 179,553                  | 179,553                  |
|                  | Turkey      | 23,834                   | 23,834                   | 23,575                   | 23,575                   |
|                  | Taiwan      | 13,269                   | 13,269                   | 13,125                   | 13,125                   |
|                  | Residual    | 22,837                   | 22,837                   | 22,589                   | 22,589                   |
| 2                | EU          | 78,489                   | 78,489                   | 77,636                   | 77,636                   |
|                  | South Korea | 11,546                   | 11,546                   | 11,421                   | 11,421                   |
|                  | India       | 9,652                    | 9,652                    | 9,547                    | 9,547                    |
|                  | Residual    | 24,492                   | 24,492                   | 24,226                   | 24,226                   |
| 4                | EU          | 313,539                  | 313,539                  | 310,131                  | 310,131                  |
|                  | Taiwan      | 32,416                   | 32,416                   | 32,063                   | 32,063                   |
|                  | India       | 23,941                   | 23,941                   | 23,681                   | 23,681                   |
|                  | Turkey      | 23,873                   | 23,873                   | 23,614                   | 23,614                   |
|                  | Residual    | 82,792                   | 82,792                   | 81,892                   | 81,892                   |
| 5                | EU          | 35,482                   | 35,482                   | 35,096                   | 35,096                   |

|     |             |         |         |         |         |
|-----|-------------|---------|---------|---------|---------|
|     | South Korea | 14,419  | 14,419  | 14,262  | 14,262  |
|     | Residual    | 2,155   | 2,155   | 2,132   | 2,132   |
| 6   | EU          | 30,938  | 30,938  | 30,602  | 30,602  |
|     | PRC         | 7,855   | 7,855   | 7,769   | 7,769   |
|     | Taiwan      | 2,565   | 2,565   | 2,537   | 2,537   |
|     | South Korea | 2,435   | 2,435   | 2,408   | 2,408   |
|     | Residual    | 1,050   | 1,050   | 1,038   | 1,038   |
| 7   | EU          | 68,848  | 68,848  | 68,099  | 68,099  |
|     | Ukraine     | 10,746  | 10,746  | 10,629  | 10,629  |
|     | Residual    | 13,824  | 13,824  | 13,673  | 13,673  |
| 12A | EU          | 28,551  | 28,551  | 28,241  | 28,241  |
|     | Residual    | 4,107   | 4,107   | 4,062   | 4,062   |
| 12B | EU          | 34,297  | 34,297  | 33,924  | 33,924  |
|     | Turkey      | 12,909  | 12,909  | 12,769  | 12,769  |
|     | Residual    | 7,336   | 7,336   | 7,256   | 7,256   |
| 13  | EU          | 72,081  | 72,081  | 71,298  | 71,298  |
|     | Turkey      | 34,148  | 34,148  | 33,777  | 33,777  |
|     | Residual    | 23,250  | 23,250  | 22,997  | 22,997  |
| 16  | EU          | 72,564  | 72,564  | 71,775  | 71,775  |
|     | Residual    | 3,168   | 3,168   | 3,134   | 3,134   |
| 17  | EU          | 146,355 | 146,355 | 144,764 | 144,764 |
|     | Residual    | 36,038  | 36,038  | 35,646  | 35,646  |
| 19  | EU          | 4,640   | 4,640   | 4,590   | 4,590   |
|     | Residual    | 137     | 137     | 135     | 135     |
| 20  | Turkey      | 15,213  | 15,213  | 15,048  | 15,048  |
|     | EU          | 6,847   | 6,847   | 6,773   | 6,773   |
|     | India       | 3,520   | 3,520   | 3,482   | 3,482   |
|     | UAE         | 2,334   | 2,334   | 2,308   | 2,308   |
|     | Residual    | 715     | 715     | 708     | 708     |
| 21  | Turkey      | 36,113  | 36,113  | 35,721  | 35,721  |
|     | EU          | 10,962  | 10,962  | 10,842  | 10,842  |
|     | Residual    | 3,332   | 3,332   | 3,296   | 3,296   |
| 25A | Japan       | 8,006   | 8,006   | 7,918   | 7,918   |
|     | EU          | 6,126   | 6,126   | 6,059   | 6,059   |
|     | South Korea | 1,224   | 1,224   | 1,210   | 1,210   |
|     | Residual    | 2,159   | 2,159   | 2,136   | 2,136   |
| 25B | EU          | 15,756  | 15,756  | 15,585  | 15,585  |
|     | South Korea | 4,529   | 4,529   | 4,479   | 4,479   |
|     | Japan       | 1,984   | 1,984   | 1,963   | 1,963   |
|     | Residual    | 4,777   | 4,777   | 4,725   | 4,725   |
| 26  | EU          | 22,073  | 22,073  | 21,833  | 21,833  |
|     | UAE         | 14,833  | 14,833  | 14,672  | 14,672  |
|     | Turkey      | 10,775  | 10,775  | 10,658  | 10,658  |
|     | PRC         | 5,668   | 5,668   | 5,607   | 5,607   |

|  |          |       |       |       |       |
|--|----------|-------|-------|-------|-------|
|  | Residual | 9,787 | 9,787 | 9,680 | 9,680 |
|--|----------|-------|-------|-------|-------|

**Table 3: Developing Country non-Exemptions by Product Category**

| Product Category | Developing country non-exemptions (July-Dec 2021 import share) |
|------------------|--|
| 1                | India (24.9%), Turkey (9.2%)                                   |
| 2                | India (12%), Ukraine (11.7%), Vietnam (8.5%), Tunisia (3.6%)   |
| 4                | Vietnam (26.7%), India (10.9%), Turkey (7.6%)                  |
| 5                | India (10.8%), Vietnam (5%)                                    |
| 6                | PRC (44.8%)  |
| 7                | Ukraine (16.6%)  |
| 12A              | n/a  |
| 12B              | Turkey (29.9%)   |
| 13               | Turkey (20%), India (8.5%)                                     |
| 16               | Ukraine (12.7%), Turkey (3.2%)                                 |
| 17               | Turkey (10.9%), India (3.2%)                                   |
| 19               | n/a  |
| 20               | Turkey (65.5%), India (15.4%), UAE (4.1%)                      |
| 21               | Turkey (79.4%), UAE (5.7%)                                     |
| 25A              | n/a  |
| 25B              | n/a  |
| 26               | Turkey (25%), UAE (13.3%), PRC (11.1%), India (5.8%)           |

**Table 4: Developing countries**

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| 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, PRC, Colombia, 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, Jamaica, Jordan, Kazakhstan, Kenya, 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, Oman, Pakistan, Panama, Papua New Guinea, Paraguay, Peru, Philippines, Qatar, Rwanda, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, Saudi Arabia, Senegal, Seychelles, Sierra Leone, Solomon Islands, South Africa, Sri Lanka, Suriname, Tajikistan, Tanzania, Thailand, Former Yugoslav Republic of Macedonia, Togo, Tonga, Trinidad and Tobago, Tunisia, Turkey, Uganda, Ukraine, United Arab Emirates, Uruguay, Vanuatu, Venezuela, Vietnam, Yemen, Zambia, Zimbabwe. |
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