



21 October 2026

Submission concerning the Union interest in the expiry reviews of anti-dumping and countervailing measures on stainless steel cold-rolled flat products (SSCR)

Proceedings concerned

- R871 — Notice C/2026/4830: Anti-dumping expiry review concerning imports originating in the People's Republic of China and Taiwan.
- R872 — Notice C/2026/4857: Anti-dumping expiry review concerning imports originating in India and Indonesia.
- R873 — Notice C/2026/5033: Anti-subsidy expiry review concerning imports originating in India and Indonesia.

NON-CONFIDENTIAL SUBMISSION

Open to consultation by interested parties



Executive summary

The present submission invites the European Commission to examine whether the continued application of anti-dumping and countervailing measures on stainless steel cold-rolled flat products (SSCR) remains in the Union interest, in light of the fundamental changes in the conditions governing imports into the European Union.

Since 1 July 2026, a substantially more restrictive tariff quota regime has limited the quantities of steel that may enter the Union without incurring an additional 50% duty. Unlike under the previous safeguard arrangements, this duty is cumulative with applicable anti-dumping and countervailing duties. In addition, imports of the products concerned have been subject to the definitive Carbon Border Adjustment Mechanism (CBAM) since 1 January 2026.

EURANIMI submits that these developments have profoundly changed the economic relevance of the existing trade defence measures. Eurostat import statistics, current market prices and the first three months of application of the new tariff regime indicate that the new 50% out-of-quota duty already constitutes an extremely powerful barrier to additional SSCR imports. Indeed, approximately one quarter of the quantities available under the new SSCR tariff quotas remained unused during the third quarter of 2026. Furthermore, not a single kilogram of SSCR was imported into the Union subject to the additional 50% out-of-quota duty during that quarter.

At the same time, European manufacturers and downstream users need to retain access to the limited number of international suppliers capable of providing SSCR at competitive prices. This is essential not only to enable them to compete on the EU market with imported finished products manufactured using steel that has not been subject to the same import duties and additional costs, but also to preserve their competitiveness in export markets, where they face manufacturers benefiting from unrestricted access to steel at international market prices. By further increasing the cost of imported SSCR, the existing anti-dumping and countervailing duties undermine the benefits that the new tariff regime still allows European manufacturers to derive from a limited degree of international competition.

EURANIMI therefore requests that the Commission examine whether maintaining these additional duties continues to serve the Union interest, taking full account of the new regulatory environment and the consequences for downstream industries.

Our principal request is that the measures be allowed to expire. Alternatively, EURANIMI formally requests their temporary suspension under the relevant provisions of the basic anti-dumping and anti-subsidy regulations, in view of the exceptional and temporary market conditions arising during the initial implementation of CBAM and the substantial protection already afforded to Union producers by the new steel tariff regime.



1. Purpose and scope of the submission

- (1) EURANIMI is the European association representing independent stockholding distributors and processors of stainless steel and aluminium. Its members supply a broad range of industrial customers throughout the European Union, including manufacturers, processors, fabricators and other downstream users of stainless steel.
- (2) EURANIMI is participating as an interested party in the three expiry reviews identified above. As the same products, market conditions, and regulatory developments are relevant to all three proceedings, the present submission sets out a common economic argument concerning the Union interest.
- (3) EURANIMI does not seek to reopen the historical findings underlying the original imposition of anti-dumping and countervailing duties. Nor does it dispute the legitimate interest of the Union in maintaining a viable and competitive European stainless steel producing industry.
- (4) Our submission addresses a different question: whether the continuation of these measures remains justified in the Union interest under market conditions that have fundamentally changed since their introduction, particularly following the application of CBAM and the new EU steel tariff regime.
- (5) We submit that this question cannot be answered by considering the existing trade defence measures in isolation. Their practical economic effects must be assessed in the context of all the measures currently affecting imports of the products concerned.

2. The Union interest extends beyond the production of stainless steel

The competitiveness of European downstream manufacturing

- (6) SSCR is not only the output of an important European industrial sector. It is also an essential input for numerous manufacturing activities, including the production of industrial equipment, machinery, components, processing installations and finished goods intended for both the European and international markets. These activities involve a vast number of companies of all sizes across the Union, from SMEs to major industrial groups, and support a substantial number of jobs.
- (7) The competitiveness of these downstream industries depends, among other factors, on access to raw materials and semi-finished products at internationally competitive prices. Unlike European manufacturers, many of their competitors established outside the Union can obtain SSCR without being subject to the same combination of import restrictions, trade defence duties and CBAM obligations.
- (8) The resulting competitive disadvantage does not remain within the European market. It also affects the ability of European manufacturers to export finished products to third-country markets, where they compete directly with manufacturers benefiting from different steel sourcing conditions.
- (9) The Union interest must therefore encompass the entire industrial value chain. Protection of upstream steel production is an important consideration, but so is the ability of European downstream industries to remain competitive, maintain manufacturing activities within the Union and preserve their position in international markets.
- (10) Access to imported stainless steel is also relevant for reasons extending beyond price. Alternative sources of supply provide competition, flexibility, security of supply and access to different specifications, qualities, and delivery arrangements.
- (11) EURANIMI does not advocate unrestricted access to the EU market for imported SSCR. The new tariff regime has already established strict quantitative limits on such access. The question is whether, within those limits, the Union should preserve a meaningful degree of competition between European producers and the very limited number of international suppliers.

A highly concentrated international supply base

(12) Eurostat statistics covering the 19 SSCR product codes over the period from 2016 to July 2026 demonstrate that an exceptionally small number of countries account for virtually all EU imports of these products.

(13) Only 13 third-country origins individually accounted for at least 1% of cumulative EU import volumes over that period. Together, those origins represented approximately 97.9% of imports, while the eleven largest accounted for approximately 95% (see Annex A).

(14) Six of these 13 origins are affected by the anti-dumping and countervailing measures concerned by the present expiry reviews, either directly or through their extension following anti-circumvention investigations. Maintaining these duties on imports from almost half of the already very limited number of significant supplying countries can therefore have substantial consequences for the sourcing alternatives available to European manufacturers.

(15) Given the exceptionally small number of significant international suppliers, it is particularly important for European manufacturers to retain access to these alternative sources of supply and to benefit from the competition they provide to Union stainless steel producers, within the quantitative limits already established by the new tariff regime.

3. A fundamentally different framework of protection

The previous safeguard arrangements

(16) When the existing anti-dumping and countervailing measures were introduced, imports of steel products were already subject to the EU safeguard arrangements established under Commission Implementing Regulation (EU) 2019/159.

(17) The tariff-rate quotas established in 2019 were calculated on the basis of average import volumes during the period 2015–2017, increased by 5% to take account of market demand. The Commission thus sought to establish a reasonable level of imports, reflecting recent and established trade flows, while ensuring adequate protection for Union steel producers.

(18) That system provided for tariff-rate quotas based on established import flows, with an additional safeguard duty of 25% applicable to imports exceeding the relevant quotas.

(19) Importantly, the Commission had expressly recognised that the cumulative application of safeguard duties and anti-dumping or countervailing duties could result in a level of protection exceeding what was intended or desirable. Accordingly, specific non-cumulation arrangements were introduced, initially through Commission Implementing Regulation (EU) 2019/1382 and subsequently through explicit provisions in the regulations imposing anti-dumping and countervailing duties on SSCR originating in India and Indonesia.

(20) Under these arrangements, where imports exceeded the safeguard tariff quotas, the combined duties collected were limited to the higher of the 25% safeguard duty or the applicable anti-dumping and countervailing duties, rather than their cumulative amount. These provisions covered SSCR imports from all four countries directly concerned by the present expiry reviews — China, Taiwan, India and Indonesia — as well as the relevant extensions of the measures to imports consigned from Taiwan, Türkiye and Viet Nam¹.

(21) In practical terms, the safeguard system was therefore designed not only to limit import volumes but also to avoid imposing an excessive cumulative remedy.

¹ Commission Implementing Regulation (EU) 2019/1382, recital 15 and Article 1; Commission Implementing Regulation (EU) 2021/2012, recitals 185–186 and Article 2; Commission Implementing Regulation (EU) 2022/433, recitals 59–62 and Article 3; and Commission Implementing Regulations (EU) 2024/1267 and (EU) 2024/1268.

The new tariff regime

(22) The regulatory framework changed fundamentally on 1 July 2026, with the application of the new EU steel tariff regime under Regulation (EU) 2026/1384 and its implementing provisions².

(23) The new regime substantially reduced the overall quantities eligible for tariff-quota treatment. In establishing the new framework, the Union used the market share of imports in 2013 as a reference for the overall volume, while the distribution of quotas also reflected more recent trade patterns.

(24) This represents a particularly striking departure from the approach followed under the previous safeguard arrangements. In 2019, the Commission had relied on import volumes recorded only two to four years earlier to establish what it considered a reasonable balance between protecting Union steel producers and preserving established trade flows. Yet, seven years later, the new tariff regime looks even further back in time, taking the import market share prevailing in 2013 — thirteen years before its introduction — as the reference for determining the overall level of imports. The new regime thus relies on a considerably more remote historical benchmark to impose substantially tighter quantitative restrictions. At the overall level, the quantities eligible for tariff-quota treatment have been reduced by approximately 47% compared with the safeguard quotas applicable in 2024.

(25) For SSCR specifically, the total annual volume eligible for tariff-quota treatment was reduced from approximately 1.065 million tonnes under the final year of the safeguard regime to just 496,342 tonnes under the new tariff regime — a reduction of 53.4%.³ In other words, the Union has more than halved the import volumes previously permitted under a safeguard system which was itself designed to protect Union steel producers.

(26) At the same time, the out-of-quota duty was increased from 25% to 50%.

(27) A further essential difference is that the new 50% duty is additional to other applicable customs duties, including anti-dumping and countervailing duties. The previous safeguard arrangements preventing the full accumulation of those measures no longer apply in the same manner.

(28) The commercial consequences are considerable. A product that previously faced a 25% safeguard duty, subject to non-cumulation arrangements, may now face a 50% out-of-quota duty in addition to applicable trade defence duties.

(29) This change alone calls for a reassessment of the practical economic effect and continued necessity of the existing anti-dumping and countervailing measures.

The introduction of definitive CBAM obligations

(30) In addition, the definitive Carbon Border Adjustment Mechanism (CBAM) has applied to imports of the products concerned since 1 January 2026. Although CBAM pursues environmental objectives and is not legally a trade defence instrument, its economic consequences must be taken into account when assessing the conditions under which imported SSCR can compete on the Union market.

(31) Under CBAM, the emissions embedded in imported products may be determined on the basis of actual emissions data or, alternatively, by applying the default values established by the Commission. The use of actual emissions requires reliable data subject to verification by an accredited verifier. For products such as SSCR, which are manufactured relatively far downstream in the steel

² Regulation (EU) 2026/1384 establishing the new tariff quota regime for certain steel products, in particular Article 3 and Annex II; Commission Implementing Regulation (EU) 2026/1457 concerning the distribution and administration of the tariff quotas, in particular Article 1 and Annex I.

³ Commission Implementing Regulation (EU) 2025/612, Annex II (Category 9, tariff quotas for 1 July 2025–30 June 2026); Commission Implementing Regulation (EU) 2026/1457, Annex I (Category 9, annual tariff quota volumes applicable from 1 July 2026). The reduction of 53.4% is calculated by EURANIMI on the basis of the respective annual totals.

production chain, determining the embedded emissions also requires accounting for the emissions associated with relevant precursors, which may originate from different installations and countries⁴.

(32) Obtaining verified emissions data throughout this production chain presents considerable practical difficulties. Accreditation of CBAM verifiers has only recently begun, and as of October 2026, only a very limited number have reportedly obtained accreditation. Given the sheer scale and complexity of the verification work required across production installations worldwide supplying the EU market, including on-site inspections and the verification of emissions from precursors, serious doubts remain as to whether fully verified emissions data will become widely available during 2027, or even in 2028⁵. This challenge extends across all six CBAM sectors: iron and steel, aluminium, fertilisers, cement, electricity and hydrogen.

(33) Consequently, importers may have to rely extensively on the Commission's default emissions values, at least during the initial years of the definitive CBAM regime. These values have deliberately been established on a conservative basis, making reliance on default values generally much less financially attractive than the use of verified actual emissions. Nevertheless, the underlying values are not arbitrary: they reflect the estimated emissions characteristics of the relevant products and countries, taking account of the production routes concerned. While verified actual emissions may differ substantially from the applicable default values, verification does not in itself eliminate the carbon costs associated with emissions-intensive production routes.

(34) The financial implications can be substantial. The price of CBAM certificates fluctuates with the EU carbon market and currently stands at approximately €82 per tonne of CO₂⁶. As each certificate corresponds to one tonne of CO₂ emissions, and the emissions embedded in one tonne of imported SSCR can readily exceed two or three tonnes of CO₂, or considerably more, the resulting CBAM-related import costs, even after the applicable adjustments, can amount to several hundred euros per tonne of SSCR. Reliance on the Commission's deliberately conservative default emissions values, where verified actual emissions are unavailable, may increase these costs considerably further.

(35) These additional costs and uncertainties must be considered alongside the new tariff restrictions and the existing anti-dumping and countervailing duties. Their combined effect is particularly relevant when examining whether imports can remain commercially viable, both within the substantially reduced tariff quotas and, even more importantly, beyond them.

4. Substantially reduced quotas remain underutilised

(36) Although the new tariff regime imposes substantially tighter restrictions on SSCR imports, it continues to provide limited opportunities for international suppliers to supply European manufacturers with the stainless steel products they need for their production activities. The extent to which these opportunities are actually being used is therefore particularly relevant to the assessment of the Union interest.

(37) Against this background, the actual utilisation of the new SSCR tariff quotas during the first quarter of their application is particularly revealing. According to the European Commission's tariff

⁴ Regulation (EU) 2023/956 establishing a carbon border adjustment mechanism, in particular Article 7 and Annex IV; Commission Implementing Regulation (EU) 2025/2547 of 10 December 2025 laying down the methods for calculating embedded emissions, including the treatment of emissions embedded in precursors used in the production of complex goods.

⁵ See Commission Delegated Regulation (EU) 2025/2551 laying down requirements for the verification of embedded emissions and the accreditation of CBAM verifiers. The practical availability of accredited verifiers during the initial implementation period remains an important consideration for operators seeking to obtain verified emissions data throughout their supply chains.

⁶ European Commission, DG TAXUD, "Price of CBAM certificates", quarterly CBAM certificate price applicable to the third quarter of 2026 (€82.32 per tonne of CO₂), published on 5 October 2026. https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism/price-cbam-certificates_en.



quota data, approximately 74% of the quantities available for SSCR under Category 9 were utilised during the period from 1 July to 30 September 2026, leaving approximately 26% unused (see Annex C).

(38) Not a single kilogram of SSCR was imported into the Union subject to the additional 50% out-of-quota duty during that quarter. Although one country-specific quota was fully exhausted, alternative tariff quota arrangements remained available, allowing further imports without incurring that additional duty.

(39) This is a particularly significant finding. The Union has deliberately reduced the quantities of SSCR eligible for tariff-quota treatment by more than half compared with the final year of the safeguard regime. Yet, even these substantially reduced quantities were not fully utilised during the first quarter of the new system.

(40) The underutilisation of the quotas should not be interpreted as evidence that European downstream manufacturers have no need for imported SSCR. Rather, it raises the question whether the commercial conditions governing imports — including existing anti-dumping and countervailing duties, prevailing price levels and the additional costs and uncertainties associated with CBAM — are preventing European manufacturers from taking full advantage of the limited sourcing opportunities that the Union has deliberately preserved.

(41) The distinction between imports within and outside the quotas is essential. Under prevailing market conditions, the 50% out-of-quota duty already makes imports of standard SSCR commercially unrealistic, even before taking account of CBAM and any applicable anti-dumping or countervailing duties. The question is therefore whether maintaining these additional duties on imports within the quotas serves the Union interest, particularly when the available quotas are not being fully utilised.

5. The role of the different origins in supplying European manufacturers

European market prices as a reference

(42) The commercial viability of SSCR imports must be assessed against the prices currently prevailing on the Union market. Recent price information collected from European distributors indicates that AISI 304 2B cold-rolled coils (CN Code 7219 33 10) are being offered by the principal Union producers — Acerinox, Aperam, Outokumpu and Acciai Speciali Terni S.p.A. (Arvedi AST) — at prices generally in the region of €2,500–2,600 per tonne, depending on quantities, specifications and delivery conditions. Comparable price levels have also been documented for Marcegaglia Specialties, a Union stainless steel re-roller. These figures provide a useful reference against which to assess the economic consequences of the applicable import duties.

(43) A comparison with import prices must necessarily take account of differences in delivery terms, transport costs and product specifications. Nevertheless, the available trade statistics and commercial evidence make it possible to assess whether imports remain economically realistic once the applicable duties are taken into account. Particular attention should be paid to the additional 50% out-of-quota duty, which must now be considered together with existing anti-dumping and countervailing duties and the financial implications of CBAM.

Indonesian SSCR

(44) Imports of Indonesian-origin SSCR provide a particularly striking illustration of the evolution of sourcing opportunities for European manufacturers under the existing trade defence measures. According to Eurostat Comext data (see Annex A), imports of Indonesian-origin SSCR exceeded 100,000 tonnes in both 2020 and 2021, reaching 106,482 tonnes and 107,361 tonnes respectively. Following the introduction of definitive anti-dumping duties in November 2021 and countervailing duties in March 2022, imports declined to 51,383 tonnes in 2022 and just 2,185 tonnes in 2023. They

subsequently fell to virtually negligible levels: 50 tonnes in 2024, 22 tonnes in 2025 and 203 tonnes during the first seven months of 2026.

(45) The combined anti-dumping and countervailing duties applicable to Indonesian SSCR vary according to the exporting producer. For the residual category of other Indonesian companies, the applicable rates are 19.3% and 20.5% respectively, representing a combined duty of 39.8%. Other producer-specific rates apply. While other factors may also have contributed to the decline, the near-total disappearance of Indonesian SSCR imports over the past three years strongly suggests that duties approaching 40% are already sufficient to make imports commercially unviable, even within the tariff quota. A fortiori, a 50% out-of-quota duty under the new tariff regime constitutes an even more formidable barrier to imports of SSCR from Indonesia.

(46) This deterrent effect is further reinforced by CBAM, particularly in the case of Indonesia's emissions-intensive stainless steel production routes, including those based on nickel pig iron (NPI). For the SSCR concerned, the Commission has established default emissions values in excess of 9.5 tonnes of CO₂ per tonne of product for 2026⁷, while the latest published CBAM certificate price stands at €82.32 per tonne of CO₂⁸. The exceptionally high default emissions values illustrate the potentially substantial additional cost facing Indonesian suppliers.

(47) The combination of the 50% out-of-quota duty and CBAM therefore appears to constitute a particularly powerful deterrent to further Indonesian imports, leaving little prospect that maintaining anti-dumping and countervailing duties would provide meaningful additional protection against imports exceeding the quotas. However, allowing the anti-dumping and countervailing duties to expire could enable European manufacturers to regain access to Indonesian SSCR within the limited volumes permitted by the tariff quotas, without undermining the protection afforded to Union producers by the new tariff regime and CBAM.

Chinese SSCR

(48) Imports of Chinese SSCR have fluctuated considerably in recent years. Following a sharp increase to 305,466 tonnes in 2022, imports declined to 22,563 tonnes in 2023, before recovering to 58,744 tonnes in 2024 and 103,529 tonnes in 2025. During the first seven months of 2026, however, only 19,808 tonnes were recorded.

(49) The very low utilisation of China's country-specific tariff quota during the third quarter of 2026 is particularly revealing. Of the 10,108 tonnes available, only approximately 4,320 tonnes were utilised, leaving 57.3% of the quota unused. This is particularly noteworthy given that imports could still take place without incurring the additional 50% out-of-quota duty. The existing anti-dumping duties on Chinese SSCR range from 24.4% to 25.3%, depending on the producer (see Annex C). The striking underutilisation of the quota suggests that, under the prevailing commercial conditions, these duties already represent a significant obstacle to imports.

(50) CBAM further reinforces these constraints. For the products concerned, the Commission has established default emissions values exceeding 6.1 tonnes of CO₂ per tonne of product for 2026, while the latest published CBAM certificate price stands at €82.32 per tonne of CO₂. This adds a potentially substantial financial burden to imports of Chinese SSCR.

(51) The fact that more than half of China's country-specific quota remained unused demonstrates how limited imports have become under the existing conditions. Against this background, a 50% out-

⁷ Commission Implementing Regulation (EU) 2025/2621 of 16 December 2025 establishing CBAM default values, as corrected by Commission Implementing Regulation (EU) 2026/1740 of 20 July 2026, in particular Annex I. The values cited in this submission refer to the relevant SSCR product codes and countries or territories of origin for 2026, including the applicable 10% mark-up.

⁸ CBAM certificate prices are linked to EU ETS allowance prices, with current projections pointing to significantly higher carbon prices in the coming years.



of-quota duty can reasonably be expected to constitute an even stronger barrier to imports than the existing anti-dumping duties of approximately 25%, independently of the additional costs associated with CBAM. Maintaining those duties therefore appears to offer little additional protection against imports exceeding the quota. Conversely, allowing them to expire could enable European manufacturers to benefit from Chinese SSCR within the limited volumes permitted by the tariff quotas, without undermining the protection afforded to Union producers by the new tariff regime and CBAM.

Indian SSCR

(52) During the third quarter of 2026, India's country-specific SSCR quota was utilised to the extent of approximately 90%, leaving 949 tonnes available (see Annex C). This relatively high utilisation confirms that Indian SSCR remains a relevant source of supply for European manufacturers. The existing anti-dumping and countervailing duties differ considerably between Indian producers, with combined rates of 14.3% for Jindal Stainless Limited and Jindal Stainless Hisar Limited, compared with 42.8% for Chromeni Steels and other Indian companies under the measures currently in force. Although Chromeni Steels has since been acquired by Jindal, the applicable duty provisions have not yet been amended, pending the outcome of the ongoing partial interim reviews. These differences significantly affect the commercial attractiveness of the respective sources of supply.

(53) In the case of Jindal, recent commercial price indications received by EURANIMI place AISI 304 2B cold-rolled coils at somewhat above €2,000 per tonne (see Annex D), before the application of import duties. At such price levels, the additional 50% out-of-quota duty alone would bring the price to more than €3,000 per tonne, even before taking account of CBAM, the existing anti-dumping and countervailing duties and any further import-related costs. This would place the material well above the indicative prices currently offered by European producers. The Commission is also examining Jindal's circumstances in two ongoing partial interim reviews and will therefore have access to more detailed information concerning the company's pricing and commercial conditions.

(54) Although the commercial circumstances of other Indian producers cannot be assessed with the same precision, the Commission's default emissions values for the SSCR products concerned are not less than 7.15 tonnes of CO₂ per tonne of product in 2026. Against a latest published CBAM certificate price of €82.32 per tonne of CO₂, this represents a potentially significant additional cost. The combination of the 50% out-of-quota duty and CBAM therefore provides substantial protection against imports exceeding the quotas. Allowing the existing anti-dumping and countervailing duties to expire could, however, improve European manufacturers' access to Indian SSCR within the limited volumes permitted by the tariff quotas, without removing that protection.

Taiwanese SSCR

(55) Taiwan provides a particularly clear illustration of the deterrent effect of the new 50% out-of-quota duty. During the third quarter of 2026, its country-specific SSCR quota was utilised to the extent of 99%, leaving only approximately 130 tonnes available (see Annex C). The quota was therefore almost entirely utilised, but not exhausted, illustrating how effectively the 50% out-of-quota duty deters imports beyond the permitted quantities. Taiwanese SSCR clearly remains an attractive source of supply for European manufacturers within the quota, despite the existing anti-dumping duties of 6.8%, or 0% in the case of Chia Far.

(56) According to Eurostat, the average import unit value for Taiwanese SSCR under CN code 7219 33 10 was approximately €1,917 per tonne during January–June 2026 (see Annex B). Applying the additional 50% out-of-quota duty alone would increase this figure to approximately €2,876 per tonne, already well above the indicative prices offered by European producers.

(57) CBAM further reinforces this deterrent effect: the applicable “Other countries and territories” default emissions value for the SSCR products concerned is 5.522 tonnes of CO₂ per tonne of product



in 2026, against a latest published CBAM certificate price of €82.32 per tonne of CO₂. The combination of these two factors makes imports exceeding the quota commercially unattractive under prevailing market conditions, independently of whether the existing modest anti-dumping duties remain in place. For European manufacturers, the essential issue is maintaining access to a competitive source of high quality SSCR within the strictly limited quantities permitted by the tariff quota.

Turkish and Vietnamese SSCR

(58) Turkish and Vietnamese SSCR also form part of the sourcing options available to European manufacturers. These products are relevant to the present assessment because the existing measures concerning Indonesian SSCR have been extended to certain imports consigned from Türkiye and Viet Nam, subject to the exemptions and conditions laid down in the relevant regulations.

(59) During the third quarter of 2026, European companies utilised approximately 89.2% of the country-specific quota for Turkish SSCR, leaving 1,865 tonnes unused, and approximately 65.6% of the quota for Vietnamese SSCR, leaving 3,769 tonnes unused (see Annex C). Neither quota was exhausted.

(60) According to Eurostat, average import unit values for CN code 7219 33 10 during January–June 2026 amounted to approximately €2,107 per tonne for Turkish SSCR and €2,002 per tonne for Vietnamese SSCR (see Annex D). The additional 50% out-of-quota duty alone would raise these values to approximately €3,161 and €3,003 per tonne respectively, already well above the indicative prices offered by European producers, even before taking account of CBAM and other applicable costs or duties.

(61) These figures demonstrate the substantial tariff barrier facing European manufacturers wishing to source additional SSCR from Türkiye or Viet Nam once the respective quotas are exhausted. CBAM further reinforces this constraint. Under these conditions, maintaining the extended anti-dumping or countervailing measures appears to offer little meaningful additional protection against imports exceeding the quotas. Their expiry could, however, improve European manufacturers' access to Turkish and Vietnamese SSCR within the limited quantities permitted by the tariff quotas.

Overall assessment

(62) The country-by-country analysis illustrates that the new 50% out-of-quota duty, reinforced by the potential costs associated with CBAM, already constitutes a powerful deterrent to imports exceeding the tariff quotas. Under these circumstances, it is difficult to identify what meaningful additional protection the continuation of anti-dumping and countervailing duties would provide against such imports.

(63) Within the substantially reduced tariff quotas, however, these duties continue to influence the relative competitiveness of suppliers from different third countries. Their practical effect may therefore be less to protect the Union industry against excessive import volumes than to determine which international suppliers can compete for the limited quantities still admitted to the European market. Whether such an additional form of selection between third-country suppliers serves the broader Union interest, particularly that of European downstream manufacturers, deserves careful consideration.

6. The Union interest in preserving limited international competition

(64) The evidence presented above points to a market in which imported SSCR is already subject to exceptionally strong quantitative and economic restrictions. Under these circumstances, the continued application of anti-dumping and countervailing duties raises an important question of Union interest: whether the additional protection afforded to European stainless steel producers justifies the restrictions imposed on the very limited international competition still permitted under the new tariff regime.



(65) Particular attention should be paid to the competitiveness of European downstream manufacturers, for whom stainless steel is an essential input. These companies compete not only in export markets but also within the Union against imported finished products, whose manufacturers may have access to steel at substantially lower costs. Higher input prices cannot necessarily be passed on to customers and may result in reduced margins, lost orders and, ultimately, pressure to relocate manufacturing activities outside the Union.

(66) Preserving meaningful access to international suppliers within the substantially reduced tariff quotas should therefore be regarded as an essential element of the competitiveness of European downstream manufacturing industries. Allowing these industries to benefit from a limited degree of international competition need not undermine the protection already afforded to Union stainless steel producers by the new tariff regime.

(67) EURANIMI does not dispute that dumping or subsidisation may continue to occur within the tariff quotas, nor that the Commission must assess the likelihood of continuation or recurrence of dumping, subsidisation and injury under the applicable regulations. However, the profound changes in the conditions governing SSCR imports, including the introduction of CBAM, warrant a careful reassessment of whether maintaining the existing trade defence duties continues to serve the broader Union interest.

7. Requests to the Commission

(68) In view of the considerations set out above, EURANIMI requests that the Commission take full account of the changed regulatory and commercial environment in all three expiry reviews.

(69) In particular, we request that the Commission examine the cumulative economic effects of the new tariff quota regime, the 50% out-of-quota duty, the existing anti-dumping and countervailing duties, and CBAM.

(70) We further request that the assessment of the Union interest give appropriate weight to the competitiveness of European downstream manufacturers, including their ability to source internationally competitive materials and to compete with manufacturers of finished products both within the Union and in export markets.

(71) EURANIMI's principal request is that the Commission examine whether the continuation of the measures remains warranted under the applicable legal criteria, taking full account of the changed regulatory and commercial circumstances and the Union interest considerations set out above. Where those criteria are not met, the measures should be allowed to expire.

(72) Should the Commission conclude that the existing measures cannot be allowed to expire, EURANIMI formally requests their temporary suspension under Article 14(4) of Regulation (EU) 2016/1036 for anti-dumping duties and Article 24(4) of Regulation (EU) 2016/1037 for countervailing duties.

(73) EURANIMI considers that the initial implementation of CBAM creates exceptional, and in important respects temporary, market conditions that warrant particular consideration under these provisions. Throughout 2027, a significant number of third-country producers may remain unable to provide fully verified emissions data, particularly for the precursors used in stainless steel production, with such difficulties potentially persisting well into 2028 for some producers. Consequently, imports may have to rely, wholly or partly, on the Commission's default emissions values.

(74) To illustrate the potential financial consequences, applying the 2027 default values to stainless steel cold-rolled flat products under CN code 7219 33 10, and using the latest published CBAM certificate price of €82.32 per tonne of CO₂, results in estimated CBAM costs of approximately €759 per tonne for Indonesia, €453 for China, €543 for India and €397 for Taiwan, after adjustment for the



free allocation benchmark applicable in 2027⁹. These illustrative amounts demonstrate the potentially substantial additional protection afforded to Union stainless steel producers during the initial implementation of CBAM. Moreover, these estimates are based on the third-quarter 2026 CBAM certificate price of €82.32 per tonne of CO₂, a conservative assumption in light of projections anticipating significantly higher carbon prices in the coming years.

(75) These circumstances are particularly relevant to the statutory requirement that injury to the Union industry should be unlikely to resume as a result of suspension. During the proposed suspension, European stainless steel producers would continue to benefit from the substantially reduced tariff quotas and the additional 50% out-of-quota duty. They would also benefit from the economic constraints imposed on imports by CBAM, potentially amplified during its initial implementation period by the extensive use of default values.

(76) EURANIMI therefore requests that the Commission assess whether these exceptional circumstances constitute a temporary change in market conditions justifying suspension, and whether the combined protection afforded by the new tariff regime and CBAM would make a resumption of injury unlikely.

Conclusion: The balance of Union interests

(77) The estimated CBAM costs presented in paragraph (74) are comparable to, and in several cases exceed, the anti-dumping and countervailing duties currently applicable to imports from the countries concerned, depending on the exporting producer and the customs value of the goods. This illustrates the considerable additional protection now afforded to Union stainless steel producers by CBAM, over and above the substantially reduced tariff quotas and the additional 50% out-of-quota duty.

(78) EURANIMI considers that this fundamentally changes the balance of Union interests. European stainless steel producers now benefit from substantial protection under the new tariff regime and CBAM, independently of whether the existing anti-dumping and countervailing duties remain in place. The Commission should therefore give greater weight to the interests of European manufacturing industries, whose competitiveness depends on access to stainless steel at internationally competitive prices. Allowing the existing measures to expire, or alternatively suspending them temporarily, would enable European manufacturers to benefit fully from competitively priced SSCR imports within the strictly limited tariff quotas that the Union itself has chosen to maintain. Imports exceeding those quotas would remain subject to the prohibitive 50% duty, preserving substantial protection for Union stainless steel producers.

...ooO0Ooo...

⁹ Illustrative CBAM cost calculations for CN code 7219 33 10, based on the Commission's default emissions values for 2027 (including the 20% mark-up), a CBAM certificate price of €82.32/t CO₂ and the applicable 2026–2027 free allocation benchmark of 1.270 t CO₂/t of product. The estimated cost per tonne is calculated as: (default embedded emissions – 1.270 × 0.95) × €82.32. No deduction has been made for carbon prices paid in the country of production, as the practical availability of such deductions remains uncertain. The calculations are illustrative and do not constitute a forecast of actual CBAM liabilities or certificate prices in 2027. See Commission Implementing Regulations (EU) 2025/2620 and 2025/2621, as corrected by Regulation (EU) 2026/1740.



Annexes

Annex A **Concentration of third-country SSCR supply to the European Union**

Eurostat import statistics by country of origin, 2016 -> July 2026.

Annex B **SSCR import prices and volumes**

Eurostat CIF unit values by CN code and country of origin, import volumes and import values

Annex C **Utilisation of EU tariff quotas for SSCR (Category 9)**

European Commission tariff quota utilisation data for the third quarter of 2026 (1 July–30 September 2026).

Annex D **Commercial price evidence for SSCR**

Offers and price indications provided by EURANIMI members, covering European and third-country suppliers. Confidential.