

18 August 2025

## **European Commission (DG TRADE) Public Consultation: EU Steel Sector – Measure tackling the negative trade-related effects of excess capacity**

### Position of the EU Batch Hot Dip Galvanizing Industry

The EU batch galvanizing industry comprises approximately 700 installations that are strategically located across all EU Member States to provide sub-contract, long-term corrosion protection for steel components, products and structures that are manufactured in the EU. Our sector processes ~ 7 million tonnes of manufactured steel products annually. Our position on the proposed replacement of the existing steel safeguard measures and the introduction of a new trade defence measure is based on two fundamental realities:

1. The future of the entire EU steel value chain, including the batch galvanizing sector, depends on a viable EU steel production sector that is properly shielded from the global issues of overcapacity of steel production. Unless the steel production sector is provided with the means to achieve the level of 85% production capacity utilisation that is envisaged in the Steel Action Plan, it will be impossible to realise the investments in decarbonisation and innovation that is required to ensure the future of the entire steel value chain.
2. The health of the batch galvanizing sector is directly dependent on the competitiveness of the EU's manufacturing and fabrication of steel end products.
  - Manufacturers, especially small steel fabricators, require access to steel at competitive prices, with adequate availability and with minimal administrative burden
  - Downstream steel-intensive end products, that are already subject to high levels of lower cost import competition, should be protected from the inevitable effects of diversions of steel trade flows towards end products, that will arise through the imposition of trade defence measures for crude, intermediate and finished steel products and the recent inclusion of these end products in the US tariff measures. Most of these steel end products are imported into the EU in the galvanized condition.

The proposed trade measures will require a carefully devised approach that takes account of both above considerations.

## SPECIFIC RECOMMENDATIONS

### 1. To include steel end products in the new measures and avoid circumvention

- To include customs codes 7308 (Structures and parts of structures, etc.); 7316 (anchors, etc.) and 7326 (other articles of iron or steel) for which significant effects of low-cost imports are observed.
- Further extension of the scope to be derived from a careful evaluation of the full Chapter 73 of the customs codes.
- If necessary, to identify and implement more precise customs codes for steel structures or end products, such as steel mounting structures for solar PV systems that may not be adequately identified within the Chapter 73 series.

### 2. To simplify administrative burdens and recognise that there is a justifiable trade in certain steel products and grades that may be in short supply.

- The existing quota system is burdensome for SMEs in the steel product manufacturing sector and should be simplified in any new system that is introduced



The general (batch) galvanizing industry provides the most effective long-term corrosion protection for steel products, through the application of a metallurgically-bonded coating of zinc metal. It is a service that is applied after manufacture of the product and normally on a sub-contract basis. The coating ensuring many decades of maintenance-free durability for vital net-zero technologies, such as solar power installations and wind energy equipment. A galvanized coating is sufficiently durable and robust to provide corrosion protection across more than one product lifecycle. Both zinc and steel are recovered at eventual end-of-life.

The European General Galvanizers Association (EGGA) is the federation of the national galvanizers associations within Europe. The industry comprises about 700 general galvanizing plants (mostly SMEs) employing an estimated 40,000 people in Europe. EGGA monitors and responds to issues affecting the general galvanizing industry in Europe, in particular environmental, technical and regulatory matters. EGGA also provides a platform for coordination of marketing and other initiatives for the industry.

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