

INFORMATIVE NOTE



DEFINITIVE ANTI-DUMPING MEASURES AGAINST IMPORTS OF HOT-ROLLED STEEL; EGYPT, JAPAN AND VIETNAM

On 25 September 2025, the European Commission adopted **Implementing Regulation (EU) 2025/1919**, imposing definitive anti-dumping measures on imports into the European Union (hereinafter referred to as the EU) of certain hot-rolled flat iron and steel products, originating in Egypt, Japan and Vietnam.

This Regulation, whose measures will be in force for five years, is approved after an investigation initiated in 2024 following a complaint by the European Steel Association (EUROFER), which provided evidence of dumping and the injury caused to the Community industry in the cases of products originating in Egypt, Japan and Vietnam.

For its part, with respect to imports from India, insufficient evidence was found to establish the existence of dumping, so no action has been taken.

i. Definitive anti-dumping duties

Consequently, Implementing Regulation (EU) 2025/1919 provides for the imposition of definitive anti-dumping duties on the CIF Union frontier price on certain hot-rolled flat iron and steel products originating in Egypt, Japan and Vietnam.

For products originating in **Egypt**, a levy of 11.7% is set for both the Ezz Steel company and all other exporters.

In the case of **Japan**, products manufactured by Tokyo Steel Co. Ltd will be subject to an anti-dumping duty of 6,9 %, while products manufactured by Daido Steel, JFE Steel and other cooperating companies will be subject to a rate of 29,8 %. All other products manufactured by Japanese exporters, including Nippon Steel Corporation, will be subject to a 30% duty.

Vietnam, for its part, will see its exports from Formasa Ha Tinh Steel Corporation taxed at 12.1%, a percentage that also extends to other exports, except for the Hoa Phat group, which is expressly excluded from the application of these measures.

ii. Conditions for the application of duties

To ensure the correct application of the rights and minimise the risk of circumvention between the different types established, the **Regulation provides for specific measures:**

a) Invoicing and customs control

The application of individual duties shall only be possible if the exporter presents to the customs authorities of the Member States a **valid commercial invoice**, in

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accordance with the requirements of Article 1.4 of the Regulation.

This invoice must include a dated statement signed by an authorized person in charge of the exporting company, identifying his name and position, with the following text:

'The undersigned certifies that the (volume of tonnes) of (product concerned) sold for export to the European Union recorded in this invoice has been manufactured by (name and address of the company) (additional TARIC code) in [Egypt, Japan or Vietnam]. You also declare that the information contained in this invoice is complete and correct'.

In the absence of such documentation, imports will automatically be subject to the anti-dumping duty applicable to "all other imports" originating in the country concerned (Egypt, Japan, or Vietnam).

The Regulation also states that even in the presence of a valid invoice, customs authorities may request additional documentation (such as transport documents) to verify the veracity of the information.

b) Change of company name

An undertaking which changes its name may apply to the Commission to retain its individual right. The application must demonstrate that the name change does not affect the identity or the right to

benefit from the rate already assigned. If accepted, the Commission will publish the amendment in the *Official Journal of the European Union*.

c) Circumvention prevention and review of measures



If a company with a reduced duty significantly increases its exports after the entry into force of the measures, that change in trade pattern may prompt the initiation of an **anti-circumvention investigation**, which could culminate in the withdrawal of its individual duty and the imposition of a national rate.

d) New exporters

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The anti-dumping duty applicable to "all other imports" will also apply to new producers that were not subject to analysis during the period of investigation.

Notwithstanding the foregoing, a new exporter not previously included in the list of cooperating companies may request the application of this reduced anti-dumping duty, provided that it proves that:

- did not export during the period under investigation,
- it is not linked to any producer subject to measures; y,
- has started exports or has firm contractual commitments to do so in substantial volumes.

e) Interaction with the Steel Safeguard Measure

Where the additional duty to be assessed for exhaustion of the quota, as a result of the duty on steel safeguard applicable under Implementing Regulation (EU) 2019/159, is higher than the anti-dumping duty, only the additional duty shall be applied, and the collection of the amount of the anti-dumping duty in the relevant part shall be suspended.

If it is lower, the amount of the additional duty shall be collected together with the safeguard measure, up to the level of the anti-dumping duty.

f) Entry into force and legal scope

The Regulation entered into force last Friday, September 26, 2025 and is directly applicable in all Member States of the European Union.

If you need more information about this, please contact any of us at the following address:

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