

# CUSTOMS NOTICE



## 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.

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**

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

For products originating in **Egypt**, an antidumping duty 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 be subject to an anti-dumping duty of 12,1% on exports from Formasa Ha Tinh Steel Corporation and other exporters, 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 duties and minimize 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 Customs a **valid commercial invoice**, in accordance with the requirements of Article 1.4 of the Regulation.

This invoice must include a dated statement signed by an authorized

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person in charge of the exporter i, 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" based on the originating country (Egypt, Japan, or Vietnam).

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

### *b) Change of the company's name*

In the event of **changes in the legal name of an exporter**, the Commission can apply an undertaking to guarantee the payment obligation.

To secure the application of reduced rate, the exporter must demonstrate that the change in the company's name does not affect the identity or the right to benefit from the anti-dumping rate granted. 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 anti-dumping 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.

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### *d) New exporters*

**New exporters** will be subject to the anti-dumping duty applicable to "all other imports" as they were not subject to an analysis during the period of investigation.

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

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

### *e) Interaction with the Steel Safeguard Measure*

Where an **additional duty** is assessed because of the quota exhaustion, as set forth in Implementing Regulation (EU) 2019/159, and such additional duty is higher than the anti-dumping one, the additional duty shall be applied, meaning that the collection of the anti-dumping duty, in the relevant part, will be suspended.

If the additional duty is lower than the anti-dumping one, the amount of the additional duty plus the amount

corresponding to the anti-dumping one shall be collected, 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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