

# New UK & EU Steel Measures: What you need to know

Operational & Commercial Implications  
for Northern Ireland Businesses



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Webinar Date  
**23rd June 2026**



**Fortior Insight**  
Customs, Trade & Business Advisory Services



# 2 Current Position as at 23rd of June 2026

UK and EU steel measures continue evolving ahead of implementation from 1st of July 2026.



## Current Published Position

This session reflects the current published UK and EU position as at 23rd of June 2026.



## Ongoing Developments

Further operational clarification and implementation detail may still emerge ahead of 1st of July 2026.



## Monitoring Official Updates

Businesses should continue monitoring:

- GOV.UK
- EU publications
- HMRC operational guidance
- and wider industry developments



## Northern Ireland Focus

The purpose of today's session is to help Northern Ireland businesses understand how the measures may land operationally and commercially in practice.



## Important Context

Northern Ireland businesses operate at the interface of UK and EU trading systems under the Windsor Framework.

GB-only or EU-only analysis does not fully reflect Northern Ireland operational reality.



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## 3

# Why This Matters Now

Steel measures are no longer just a customs issue – they increasingly influence sourcing, pricing, supply chain visibility and commercial competitiveness.

01



## THE ENVIRONMENT IS CHANGING

- UK safeguard measures changing from 1st of July 2026
- EU safeguard measures tightening during 2026
- quota volumes reducing in multiple categories
- out-of-quota tariff exposure increasing
- customer information expectations evolving



Businesses should not assume current supply chain arrangements **remain unaffected.**

02



## ROUTE AND ORIGIN NOW MATTER MORE

Businesses increasingly need visibility of:

- underlying origin
- supplier routing
- customs treatment
- quota interaction
- and wider traceability requirements



The same product may create different operational outcomes **depending on route and origin.**

03



## NORTHERN IRELAND OPERATES DIFFERENTLY

Northern Ireland businesses operate:

- within UK systems
- at the interface of EU systems
- and under Windsor Framework arrangements



GB-only or EU-only analysis does not fully reflect **Northern Ireland operational reality.**

04



## THIS IS ALSO A COMMERCIAL ISSUE

Potential impacts may include:

- landed cost volatility
- sourcing changes
- customer evidence requests
- margin pressure
- procurement delays
- and supply chain restructuring



Operational visibility increasingly supports **commercial resilience.**

## WHY BUSINESSES ARE REVIEWING THIS NOW



Reduced UK TRQs from July 2026



50% UK out-of-quota tariff risk



EU safeguard tightening



Growing CBAM-style customer requests



Increased traceability expectations



Supply chain transparency pressures

“ *The issue is no longer simply tariffs.*

It is increasingly about **visibility, operational readiness, sourcing flexibility and commercial positioning.** ”



## KEY MESSAGE

Businesses understanding their **routes, suppliers, origin exposure and operational position** earlier will likely respond more effectively as the environment evolves.



**DISCLAIMER:** Current published position as at recording date | June 2026  
Businesses should continue monitoring UK Government, EU Commission and HMRC operational guidance.

# 4

# Why Governments Are Acting

The measures form part of wider global steel, trade defence and industrial protection developments.

**01**  **GLOBAL OVERCAPACITY CONCERNS**  
 Governments continue expressing concerns around:

- global steel overcapacity
- redirected trade flows
- state-supported production
- and trade distortion risks

**02**  **TRADE DEFENCE MEASURES EXPANDING**  
 Countries increasingly using:

- safeguard quotas
- anti-dumping measures
- origin controls
- and supply chain monitoring mechanisms

Steel trade is becoming more strategically managed globally.

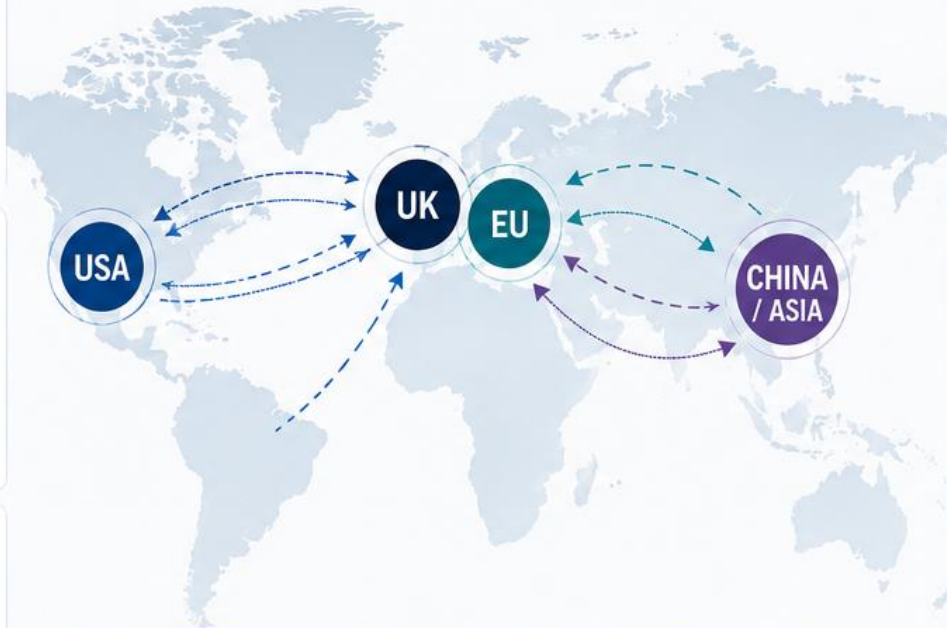
**03**  **CUSTOMER EXPECTATIONS ALSO EVOLVING**  
 Customers increasingly requesting:

- mill certificates
- emissions information
- origin declarations
- supplier traceability
- and wider supply chain visibility

**04**  **NORTHERN IRELAND SITS AT THE INTERFACE**  
 Northern Ireland businesses increasingly operate:

- between UK and EU systems
- across multiple customs environments
- and within evolving commercial expectations

Operational understanding itself increasingly becomes commercially valuable.



“ Many of the changes now emerging are part of a much wider shift toward greater supply chain visibility, industrial protection and strategic trade management. ”

**WHAT THIS MEANS FOR BUSINESSES**

-  Procurement decisions matter more.
-  Route selection matters more.
-  Supplier visibility matters more.
-  Documentation quality matters more.
-  Earlier preparation supports resilience.
-  Understanding both UK and EU systems will hold strategic advantage.

 **KEY MESSAGE** | Northern Ireland businesses that understand both operational systems and commercial expectations may be better positioned than many realise.

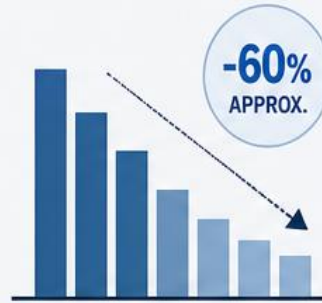
**i** **DISCLAIMER:** Current published position as at recording date | June 2026  
 Operational guidance, safeguard measures and wider policy positions may continue evolving during 2026.

# What the UK Is Changing

UK steel safeguard measures due from 1<sup>st</sup> of July 2026

## 1 UK TRQs Reduced

Many UK tariff rate quotas due to reduce from Q3 2026



Some categories reportedly reduced by approximately 60%



Final operational position remains subject to UK Government confirmation and implementation detail.

## 2 50% Safeguard Tariff



Imports above available quota may face a **50% safeguard tariff**.



Applies where relevant quota availability has been exhausted.

## 3 UK Policy Objective

UK measures linked to:



Global overcapacity concerns



Trade diversion risk



Domestic steel sector protection objectives



Why This Matters for Northern Ireland



Northern Ireland businesses may still interact with EU safeguard requirements depending on **route** and **origin**.

# What the EU Is Changing

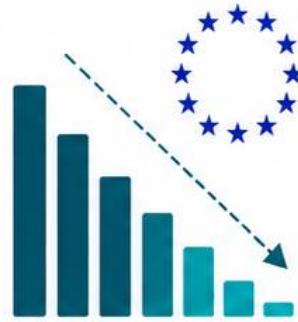
## EU safeguard measures and wider steel policy developments



• Current position •

### 1 EU TRQs Tightening

EU safeguard quotas are due to tighten from 1<sup>st</sup> of July 2026 under the EU's replacement steel protection framework.



The framework has progressed through the EU legislative process, with significant quota reductions proposed across certain categories.



Final legal texts and implementation detail remain subject to EU publication and operational guidance.

### 2 50% Duty Above Quota



Imports above available quota may face a **50% safeguard duty**.



Applies once relevant country-specific or global quota has been exhausted.

### 3 Wider EU Direction of Travel

EU policy direction increasingly focused on:



Supply chain traceability



Trade defence enforcement



Carbon reporting and CBAM



Origin verification and melt & pour scrutiny



Product standards and strategic resilience



### Why This Matters for Northern Ireland



Northern Ireland businesses will increasingly operate between evolving **UK** and **EU** steel regimes.



**DISCLAIMER:** Current published position. Further operational clarification and legislative steps may still emerge ahead of implementation from 1st of July 2026.



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# Why Northern Ireland Is Different

Northern Ireland operates at the interface of UK and EU trade systems.



Different rules can apply depending on **route** and **origin**.

Route and origin increasingly shape operational outcomes.

*Simplified conceptual illustration only*

# Where Northern Ireland Started From

Historically, EU safeguard measures were generally more operationally relevant for many NI steel movements.



## HISTORIC POSITION

EU safeguards historically more relevant



- EU safeguards frequently operationally relevant
- UK TRQs only relevant for RoW → NI Direct Imports when UK TRQs applied
- Many NI businesses focused primarily on EU quota availability

## NORTHERN IRELAND SITUATED BETWEEN TWO EVOLVING STEEL REGIMES



Dual compliance considerations

## EMERGING POSITION

UK measures becoming increasingly relevant



- Change in UK TRQ strategy impacting supply & price
- NI businesses will increasingly monitor both UK and EU developments
- Route, origin and sourcing strategy becoming more important



KEY MESSAGE

Northern Ireland increasingly sits at the interface of evolving **UK** and **EU** steel policy.



# Steel Import Route Logic

Route and Origin determine operational treatment.



Same Steel Product



Different operational outcome depending on route and origin

# Scenario 1 – EU Origin Steel

EU origin steel and steel in free circulation in the EU moving into Northern Ireland



**1 EU Origin / Free Circulation**




EU origin steel and steel already in free circulation in the EU moves freely into NI under Windsor Framework arrangements.

**2 No Further EU Safeguard Quota Check**



No additional EU safeguard quota interaction for qualifying EU free circulation movements.

**3 Simplest Operational Route**



Typically the most operationally straightforward steel movement scenario into NI.

**COMMERCIAL IMPLICATIONS**

-  Lower safeguard exposure
-  Greater supply predictability
-  Reduced quota volatility risk
-  Potential commercial advantage for NI businesses sourcing within EU/free circulation channels

 **KEY MESSAGE** | Not all steel movements into Northern Ireland are impacted equally. 

# Scenario 2 – EU → GB → NI

## EU Origin Steel supplied via Great Britain



### 1 EU Origin Retained



EU origin steel supplied via GB reseller to NI requires import declaration when moving into NI.

### 2 No EU Quota Check on Clearance into NI



However, no EU quota check is required on clearance into NI.

### 3 Windsor Framework Route



EU origin steel can move into NI from GB under Windsor Framework arrangements with no additional EU quota interaction.



### COMMERCIAL IMPLICATIONS



Import declaration will be required on entry into NI



No EU safeguard quota check required where EU origin status is evidenced



Less administrative burden compared to GB or RoW origin steel



Simpler process with lower compliance cost and faster clearance



### KEY MESSAGE

EU origin steel supplied via GB reseller will need an import declaration but **NOT EU** safeguard quota checks, where **EU origin status is evidenced**.



**Disclaimer:** This material is for general information purposes only and does not constitute legal or professional advice. Regulations and policy positions may change. Businesses should seek their own specific advice in relation to their circumstances.

# Scenario 3 – GB → NI

## Great Britain origin steel into Northern Ireland



### 1 GB Origin Steel



Steel of Great Britain origin moving into NI interacts with EU safeguard arrangements under the Windsor Framework.

### 2 UK/NI Specific Quota Arrangements



Under the Windsor Framework, the UK and EU agreed specific UK/NI quota arrangements for certain sensitive steel categories.

These quota arrangements have subsequently been reviewed and expanded through UK–EU Joint Committee engagement.

### 3 Operational Considerations



Relevant quota availability must still exist and be correctly utilised on import into NI.

Import planning, classification and quota monitoring remain important.



### COMMERCIAL IMPLICATIONS



More favourable position than RoW origin steel



UK/NI quota arrangements support continued GB–NI steel movements



Quota availability and category management remain important



Earlier supply chain planning increasingly beneficial



### KEY MESSAGE

GB origin steel into NI benefits from **specific UK/NI quota arrangements** agreed under the Windsor Framework.



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# Scenario 4 – RoW → GB → NI

Rest of World origin steel supplied via Great Britain



## 1 RoW Origin Retained



RoW origin steel supplied via GB into NI retains its underlying RoW origin for EU safeguard and trade remedy purposes.



## 2 EU Quota Interaction



Relevant EU safeguard quota availability will require consideration based on underlying origin.

Country-specific or global quota treatment will apply depending on origin.

## 3 Additional Trade Remedy Exposure



Other EU trade remedies such as anti-dumping duties (ADD) may also apply depending on origin and product category.

Origin visibility and supplier documentation become increasingly important.

## COMMERCIAL IMPLICATIONS

Greater landed cost uncertainty

Supplier origin visibility increasingly important

Quota management and timing becoming commercially significant

Businesses may review sourcing and routing structures



## KEY MESSAGE

Routing steel through GB **does not remove** underlying RoW origin exposure for EU safeguard or trade remedy purposes.



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# Scenario 5 – RoW → NI Direct

## Direct Rest of World steel imports into Northern Ireland



RoW



NI



### 1 RoW Origin Direct Import



RoW origin steel imported directly into NI retains its underlying RoW origin for EU and UK safeguard purposes.



Direct imports mean no change to underlying origin exposure.

### 2 EU & UK TRQs Will Apply



Relevant EU and UK tariff quota positions must both be considered.

Quota availability, origin and product category will determine exposure.



RoW steel into NI can access UK safeguard quotas or equivalent in-quota treatment, provided the relevant EU TRQ exists and is open.

Source: UK Government Guidance – Northern Ireland steel import duty (last updated May 2025)

### 3 Additional Trade Remedy Exposure



EU and, where applicable, UK trade remedies such as anti-dumping duty may also apply depending on origin and product category.

Higher-risk origin categories may face additional landed cost exposure.



Check both EU and UK measures for your origin and product.



### COMMERCIAL IMPLICATIONS



Highest landed cost uncertainty.



Quota timing and availability critical.



Origin verification and supplier due diligence essential.



Sourcing strategy may need reviewed to manage cost and risk.



### IMPORTANT CONTEXT – UK STEEL STRATEGY

From 1 July 2026, the UK is introducing a new steel trade measure with substantially lower TRQs and a 50% out-of-quota tariff rate, increasing UK quota exposure and commercial risk for RoW imports.

Source: UK Steel Strategy (May 2025)



### KEY MESSAGE

Direct RoW imports into NI require both EU and UK safeguard quota consideration, with potential additional EU and UK trade remedy exposure.



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# Northern Ireland Specific Support Mechanisms

NI-specific mechanisms linked to EU duty exposure under the Windsor Framework



1

## Customs Duty Waiver Scheme (CDWS)

Can waive qualifying EU duty on “at risk” goods imported into NI, subject to eligibility conditions.

- Most businesses will qualify for up to €300,000 Customs Duty Waiver allowance over a rolling 3-year period, although lower limits apply in certain sectors.
- The allowance also includes other qualifying *de minimis* state aid received by the importing business within the same rolling 3-year period.
- Businesses should **monitor** remaining balance and cumulative **state aid utilisation**.



2

## Duty Reimbursement Scheme (DRS)

May allow repayment of qualifying EU duty where goods remain in NI, move to GB or are exported outside the UK/EU.

- Evidence requirements and qualifying conditions apply.
- HMRC guidance now includes replenishment mechanisms allowing qualifying businesses to **restore CDWS balance** through successful claims.



3

## CDWS Replenishment

HMRC guidance now permits qualifying businesses to reclaim state aid used under CDWS where goods did not enter the EU.

- Successful claims may restore available CDWS balance.
- Evidence and audit records remain essential.
- Replenishment claims are subject to **qualifying conditions** and evidence requirements.



## Important Operational Points



These mechanisms relate to **EU duty exposure only**



They do not remove **UK tariff exposure**



Evidence, eligibility and record keeping remain **critical**



Businesses should review both **CDWS utilisation** and **DRS opportunities** as part of wider **customs planning**.



## KEY MESSAGE

Northern Ireland importers have access to unique support mechanisms under the Windsor Framework, but **eligibility, evidence** and **state aid limits** remain **critical**.



**DISCLAIMER:** Current published position as at June 2026. Businesses should monitor GOV.UK guidance for operational updates, qualifying conditions and future scheme developments.



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# Customs Planning & Supply Chain Tools

Traditional customs and operational planning tools businesses may consider



1



## Customs Warehousing

Allows imported goods to be stored under customs control before release into free circulation.

- Can support stockholding strategy, quota timing, **cashflow management** and supply continuity planning.
- Does not remove final duty exposure where quota is unavailable at time of release.

2



## Inward Processing (IP)

Can suspend duty and VAT where imported goods are processed under an authorised customs procedure.

- May support manufacturing and processing operations involving imported **steel and other imported inputs**.
- Requires authorisation, discharge records and operational suitability assessment.

3



## Supply Chain Planning

Businesses should increasingly review sourcing routes, stockholding strategy and quota timing.

- Origin visibility, supplier engagement, **traceability** and landed cost forecasting **are** becoming increasingly important.



## Operational Reality



No single customs procedure fits **every business model**.



**Commercial viability** remains as important as technical eligibility.



Earlier **planning** may improve sourcing **flexibility and resilience**.



Customs procedures should be reviewed alongside wider **supply chain strategy**.



## KEY MESSAGE

Businesses that understand **route, origin, quota timing** and customs procedures early will be better positioned to manage **cost** and **supply chain risk**.



**DISCLAIMER:** Current published position as at recording date | June 2026  
Customs procedures and eligibility conditions remain business and supply-chain specific.



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# Emerging Business Behaviour & Market Response

Operational and commercial responses beginning to emerge across the market

1



## Increased Origin Visibility

Businesses increasingly seeking earlier confirmation of steel origin, mill certificates and sourcing route.

- Procurement and landed cost forecasting becoming more commercially important.

2



## Greater Focus on Quota Timing

Quota availability and timing increasingly influencing purchasing and import planning decisions.

- Some businesses already reviewing stockholding and import scheduling strategies.

3



## Supply Chain Review Activity

Businesses increasingly reviewing sourcing structures, supplier mix and routing options.

- Some NI businesses reassessing GB, EU and direct RoW sourcing models.

4



## Earlier Customer & Supplier Conversations

Businesses increasingly engaging customers and suppliers earlier regarding pricing, lead times, origin evidence and traceability requirements.

- Commercial transparency increasingly important across supply chains.



## Important Market Reality



Different sectors face different levels of exposure



Product category and origin remain critical



Commercial impacts may emerge before operational disruption



Market behaviour likely to continue evolving as UK and EU policy develops

“ Some businesses are already responding operationally by reviewing **sourcing routes**, increasing **stockholding**, considering **customs warehousing**, and looking more closely at **quota timing**.

That is not theory. That is what more sophisticated operators are already having to think about.”



## KEY MESSAGE

For many businesses, the **uncertainty** itself is already beginning to influence **commercial behaviour** and **supply chain planning**.



**DISCLAIMER:** Current published position as at recording date | June 2026  
Market behaviours and operational responses continue evolving across sectors and supply chains.



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# Downstream Export & Customer Consequences

Dual Market Access remains a major advantage, but origin, evidence and customer expectations still matter



1



## UK Market Access

Goods in free circulation within Northern Ireland generally retain Qualifying Northern Ireland Goods access to Great Britain.

- ✓ Northern Ireland businesses continue benefiting from unfettered access to the GB market under the Windsor Framework arrangements.

2



## EU Market Access

Goods in free circulation within Northern Ireland can generally continue moving into the EU without an additional customs import process.

- ✓ Northern Ireland continues holding a unique position at the interface of UK and EU goods markets.

3



## Export Markets Beyond GB & EU

When goods move beyond GB or EU markets, raw material sourcing choices can affect origin claims, customer evidence requirements and ultimately, competitiveness.

- ✓ Import decisions today may influence export positioning tomorrow.

4



## Increasing Customer Information Requests

EU customers are increasingly requesting:



- ✓ Even where no direct CBAM obligation applies in NI, commercial data expectations are increasingly flowing through supply chains.



## Strategic Commercial Reality



Supply chain transparency increasingly matters commercially.



Origin and sourcing decisions may affect customer confidence.



Export competitiveness increasingly linked to evidence and traceability.



Businesses understanding both UK and EU systems will hold strategic advantage.

“ The issue is no longer just tariffs.

Increasingly, it is about origin, traceability, embedded emissions, customer expectations and long-term supply chain confidence. ”



## KEY MESSAGE

Northern Ireland businesses retain significant UK and EU market access advantages, but sourcing, origin and evidence increasingly shape wider export competitiveness.



**DISCLAIMER:** Current published position as at recording date | June 2026  
Export market requirements, CBAM expectations and customer evidence requests continue evolving across jurisdictions and supply chains.



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# What Businesses Should Review Now

Key operational, sourcing and commercial considerations for Northern Ireland businesses

1		<h3>Supply Chain Mapping</h3> <p>Understand:</p> <ul style="list-style-type: none"><li>• where steel and other raw materials originate,</li><li>• how goods move through the supply chain,</li><li>• and which routes create safeguard, origin or traceability exposure.</li></ul>	➤	<p>Route and origin increasingly matter commercially, operationally and strategically.</p>
2		<h3>Commodity Codes &amp; Product Scope</h3> <p>Confirm whether products fall within:</p> <ul style="list-style-type: none"><li>• UK safeguard scope,</li><li>• EU safeguard scope,</li><li>• CBAM scope,</li><li>• or additional trade remedy categories.</li></ul>	➤	<p>Product classification increasingly influencing commercial exposure.</p>
3		<h3>Supplier Information &amp; Origin Evidence</h3> <p>Review availability of:</p> <ul style="list-style-type: none"><li>• mill certificates,</li><li>• origin declarations,</li><li>• emissions information,</li><li>• and wider traceability evidence.</li></ul>	➤	<p>Customer evidence expectations increasingly flowing through supply chains.</p>
4		<h3>Customs Treatment &amp; "At Risk" Exposure</h3> <p>Businesses should understand that steel subject to EU safeguarding measures is automatically considered "At Risk" when entering NI.</p> <ul style="list-style-type: none"><li>• This means UKIMS cannot be used where EU safeguard tariffs apply.</li><li>• UKIMS authorisation may still remain relevant in supporting Duty Reimbursement Scheme claims, but only in limited scenarios such as operation in certain exempt sectors or for qualifying businesses below the applicable E2M processing threshold.</li></ul>		
5		<h3>Customer &amp; Export Exposure</h3> <p>Review whether:</p> <ul style="list-style-type: none"><li>• customer markets,</li><li>• export routes, or</li><li>• contractual obligations may create additional origin or traceability requirements.</li></ul>	➤	<p>Import choices may increasingly influence downstream export competitiveness.</p>
6		<h3>Internal Governance &amp; Monitoring</h3> <p>Businesses should increasingly monitor:</p> <ul style="list-style-type: none"><li>• UK policy changes,</li><li>• EU safeguard developments,</li><li>• CBAM developments,</li><li>• and wider supply chain risks.</li></ul>	➤	<p>Earlier planning will improve resilience and sourcing flexibility.</p>



## Important Reality



Businesses do not need to solve everything immediately.

But businesses understanding:



their routes,



origin exposure,



supplier visibility,



and customer expectations

will likely be better positioned commercially and operationally.



### KEY MESSAGE

The businesses likely to respond best will be those that **understand their supply chain** before disruption forces reactive decisions.



**DISCLAIMER:** Current published position as at recording date | June 2026  
Businesses should continue reviewing official UK and EU guidance as policy and operational positions evolve.



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# What Has Changed Since March 2026?

Key developments shaping the operating environment for Northern Ireland businesses



1		<b>UK Steel Strategy Published</b> <ul style="list-style-type: none"><li>Major reductions in UK steel safeguard TRQs and a 50% out-of-quota tariff are due to take effect from 1st of July 2026.</li></ul>	19 Mar 2026
2		<b>XI Customs Data Visibility Expanded</b> <ul style="list-style-type: none"><li>CDS reporting access expanded to include XI EORI declaration visibility, giving Northern Ireland businesses greater ability to review customs declarations submitted in their name.</li></ul>	April 2026
3		<b>Duty Reimbursement Scheme Changes</b> <ul style="list-style-type: none"><li>HMRC announced revised Duty Reimbursement Scheme rules. Changes to eligibility and calculation methodologies took effect immediately from publication.</li></ul>	May 2026
4		<b>CDWS Replenishment Introduced</b> <ul style="list-style-type: none"><li>CDWS replenishment became available from 26th of May 2026, enabling businesses to restore duty waiver allowance where qualifying goods did not enter the EU.</li></ul>	May 2026
5		<b>EU Steel Strategy Changes Confirmed for July 2026</b> <ul style="list-style-type: none"><li>The EU's replacement steel protection framework has progressed through the legislative process, with implementation expected from 1st of July 2026.</li><li>Measures include tighter quotas, enhanced monitoring and continued focus on origin and trade defence measures.</li><li>Final implementation remains subject to EU publication and legal detail.</li></ul>	May 2026
6		<b>Customer Information Requests Increasing</b> <ul style="list-style-type: none"><li>CBAM-related emissions data, mill certificates and wider traceability requests continue increasing across supply chains.</li></ul>	May–June 2026
7		<b>Reduced UK TRQs &amp; 50% Out-of-Quota Tariff</b> <ul style="list-style-type: none"><li>From 1st of July 2026, significantly reduced UK TRQs and a 50% out-of-quota tariff may materially increase commercial exposure for some steel imports.</li></ul>	Announced Mar 2026

## What This Means For Businesses



Trade policy and tariff changes are material and will directly impact cost and competitiveness.



Visibility, traceability and data quality are increasingly important across the value chain.



Rules and processes are evolving quickly – businesses must stay informed and agile.



Strategic sourcing, origin and export decisions require careful review.



Supply chain resilience and documentation capability are key competitive differentiators.



Delayed review may increase future commercial and supply chain pressure.



### KEY MESSAGE

The trade landscape is evolving quickly. Northern Ireland businesses that **act now** to understand the changes will be best placed to **manage risk and capture opportunity**.



**DISCLAIMER:** Current published position | June 2026  
Export market requirements, CBAM expectations and customer evidence requests continue evolving across jurisdictions and supply chains.



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# What We Are Watching Closely

Important developments that may influence the position during 2026

01



## UK-EU Discussions Continuing

The UK and EU continue engaging on steel trade and quota arrangements ahead of the introduction of new measures from 1st of July 2026.

- Further UK-EU engagement may influence future steel trade arrangements and operational treatment.

02



## Potential For Future Agreements

The Windsor Framework already contains specific UK-NI steel quota arrangements for certain sensitive categories.

- The Windsor Framework demonstrates that bespoke UK-EU arrangements can be developed for sensitive sectors where both sides identify shared interests.

03



## Future Customer Requirements

Customer expectations around CBAM data, emissions reporting, traceability and origin evidence continue evolving.

- Supply chain transparency, origin evidence and emissions data are becoming increasingly important commercial considerations.

04



## UK CBAM Development

UK CBAM remains scheduled for introduction from 1st of January 2027.

- Further operational detail and guidance expected during 2026.

05



## Market Response & Adaptation

Businesses, importers, suppliers and customers continue adapting sourcing and procurement strategies.

- Business adaptation and sourcing decisions may increasingly shape market outcomes alongside policy developments.



## KEY MESSAGE

While important questions remain, businesses should not overlook the **opportunities** created by **greater visibility, earlier planning** and Northern Ireland's **unique market position**.



## Reasons For Optimism



Northern Ireland retains **Dual Market Access** advantages.



UK and EU dialogue remains active.



Windsor Framework solutions already exist for sensitive steel categories.



Businesses now have **greater customs visibility and planning tools**.



Earlier preparation can improve **resilience and commercial flexibility**.

“ *The position continues evolving – but so too does business visibility, operational readiness and strategic awareness.* ”

For many Northern Ireland businesses, preparedness itself may become a competitive advantage. ”



**DISCLAIMER:** Current published position | June 2026  
UK Government, EU Commission and HMRC operational positions may continue evolving.



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# Northern Ireland's Strategic Position

Real challenges exist, but Northern Ireland also retains unique operational and market advantages



01



## Genuine Commercial Pressures

Businesses continue raising legitimate concerns around:

- quota availability
- pricing
- sourcing flexibility
- competitiveness
- long-term supply certainty.

> These concerns should not be underestimated.

02



## Operational Experience Matters

Many Northern Ireland businesses already operate daily at the interface of:

- UK systems
- EU systems
- customs requirements
- cross-border supply chains.

> Operational familiarity increasingly becoming commercially valuable.

03



## Dual Market Access Remains Important

Northern Ireland's dual market position may increasingly differentiate NI businesses from counterparts operating solely within GB or EU markets.

04

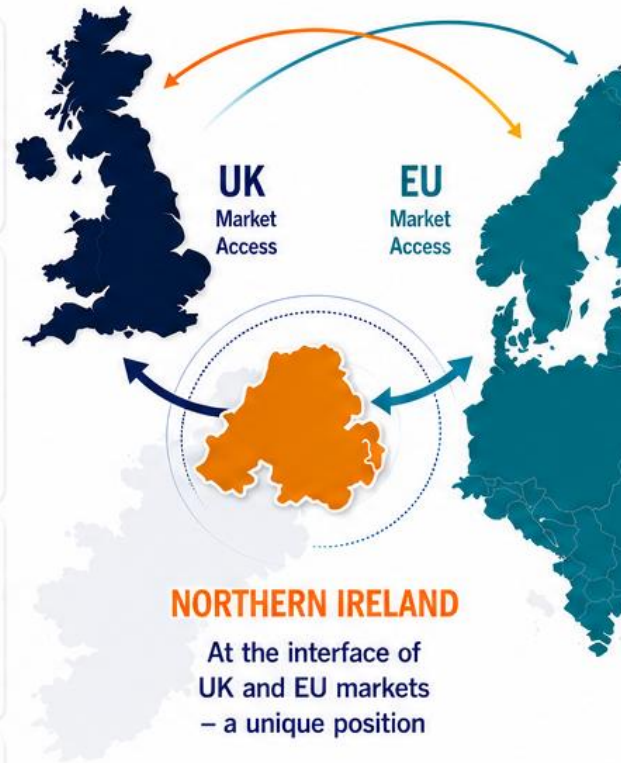


## Earlier Visibility & Adaptation

Northern Ireland businesses now increasingly understand:

- route exposure
- origin considerations
- customs visibility
- supplier traceability requirements.

> Earlier visibility, adaptation and supply chain planning may improve resilience and long-term competitiveness.



## Strategic Advantages



Practical experience operating across UK and EU systems.



Existing customs and supply-chain familiarity.



Greater awareness of route and origin implications.



Dual Market Access positioning.



Experience adapting operationally since Brexit and the Windsor Framework.

“ *The concerns being raised across the market are real.* ”

But Northern Ireland businesses may also be better positioned than many realise because they already operate at the intersection of UK and EU trade systems. ”



Goods Flows



Supply Chain Connections



Regulatory Alignment



Commercial Relationships



## KEY MESSAGE

Northern Ireland businesses face real operational and commercial pressures, but many also hold **strategic advantages** not always available to competitors operating solely within GB or EU markets.



**DISCLAIMER:** Current published position | June 2026  
Operational outcomes will continue depending on route, origin, product category and future UK/EU developments.



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# Key Takeaways

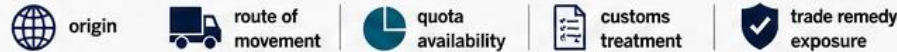
The operational environment is changing, but preparedness and visibility matter

01



## Route & Origin Matter

The same steel product can create different operational outcomes depending on:



02



## Northern Ireland Is Different

Northern Ireland businesses operate at the interface of UK and EU trading systems under the Windsor Framework. GB-only or EU-only analysis does not fully reflect Northern Ireland operational reality.

03



## This Is Broader Than Tariffs

The issue is not simply whether tariff applies. Businesses also need to consider:

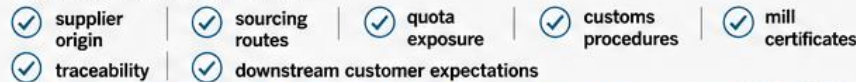


04



## Visibility & Preparation Matter

Businesses should understand:



Earlier preparation supports stronger operational resilience and commercial flexibility.

05



## Complexity Can Also Create Opportunity

Northern Ireland businesses that understand:



may ultimately hold strategic advantages not always available elsewhere.



## FINAL KEY MESSAGE

Northern Ireland businesses face real operational and commercial pressures, but many also retain strategic advantages through operational experience, **Dual Market Access positioning** and understanding how **UK and EU systems interact in practice**.



## Final Strategic Position



Northern Ireland remains **operationally unique**.



UK and EU systems continue **diverging**.



Businesses should review supply chains **now**.



Sophisticated operators are **already preparing**.



Earlier understanding supports better **strategic positioning**.



*The issue is no longer simply tariffs.*

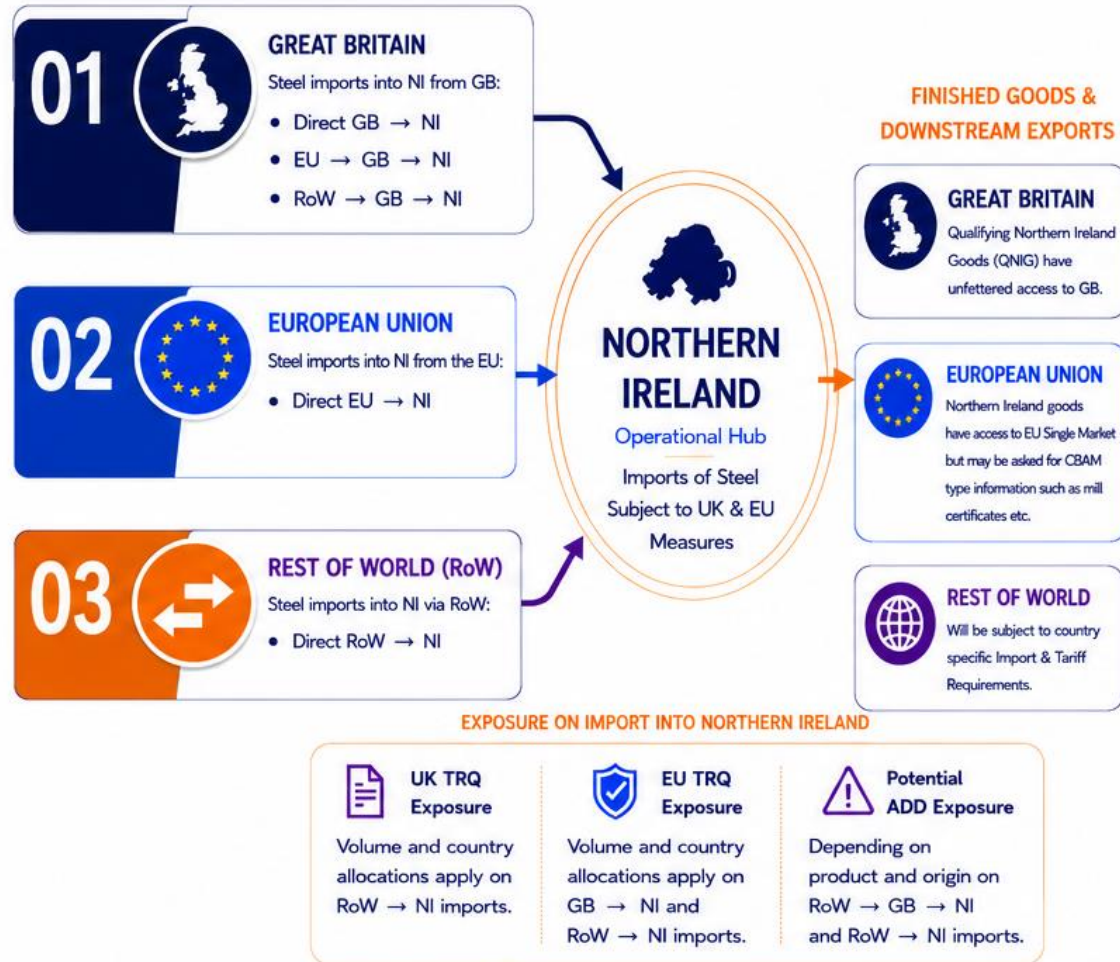
It is about **visibility, traceability, operational understanding and strategic positioning**.



**DISCLAIMER:** Current published position | June 2026  
Businesses should continue reviewing official UK Government, EU Commission and HMRC guidance.

# Thank You & Q&A

## Steel imports and forthcoming changes for Northern Ireland businesses



“

*“Northern Ireland businesses are operating at the intersection of two evolving systems.”*

”

Understanding how UK and EU systems interact in practice will increasingly become a competitive advantage.



Thank you for attending this session.

This session explored:

- ✓ route and origin considerations
- ✓ quota exposure
- ✓ supply chain implications
- ✓ mitigation options
- ✓ Northern Ireland’s strategic position



### Key Reminder

The steel and customs landscape continues evolving and businesses should continue monitoring:

- ✓ UK Government guidance
- ✓ EU developments
- ✓ HMRC operational updates
- ✓ wider supply chain developments



Thank you for your engagement and participation throughout today’s webinar.



**Jonathan Walsh**

Fortior Insight Ltd

Customs, Trade & Strategic Advisory Services



**Fortior Insight**

Customs, Trade & Business Advisory Services

# Mitigating Supply Chain Risks and Building Resilience

**Clive Stewart**  
Supply Chain Resilience &  
Development Solutions

23 June 2026



## Who we are

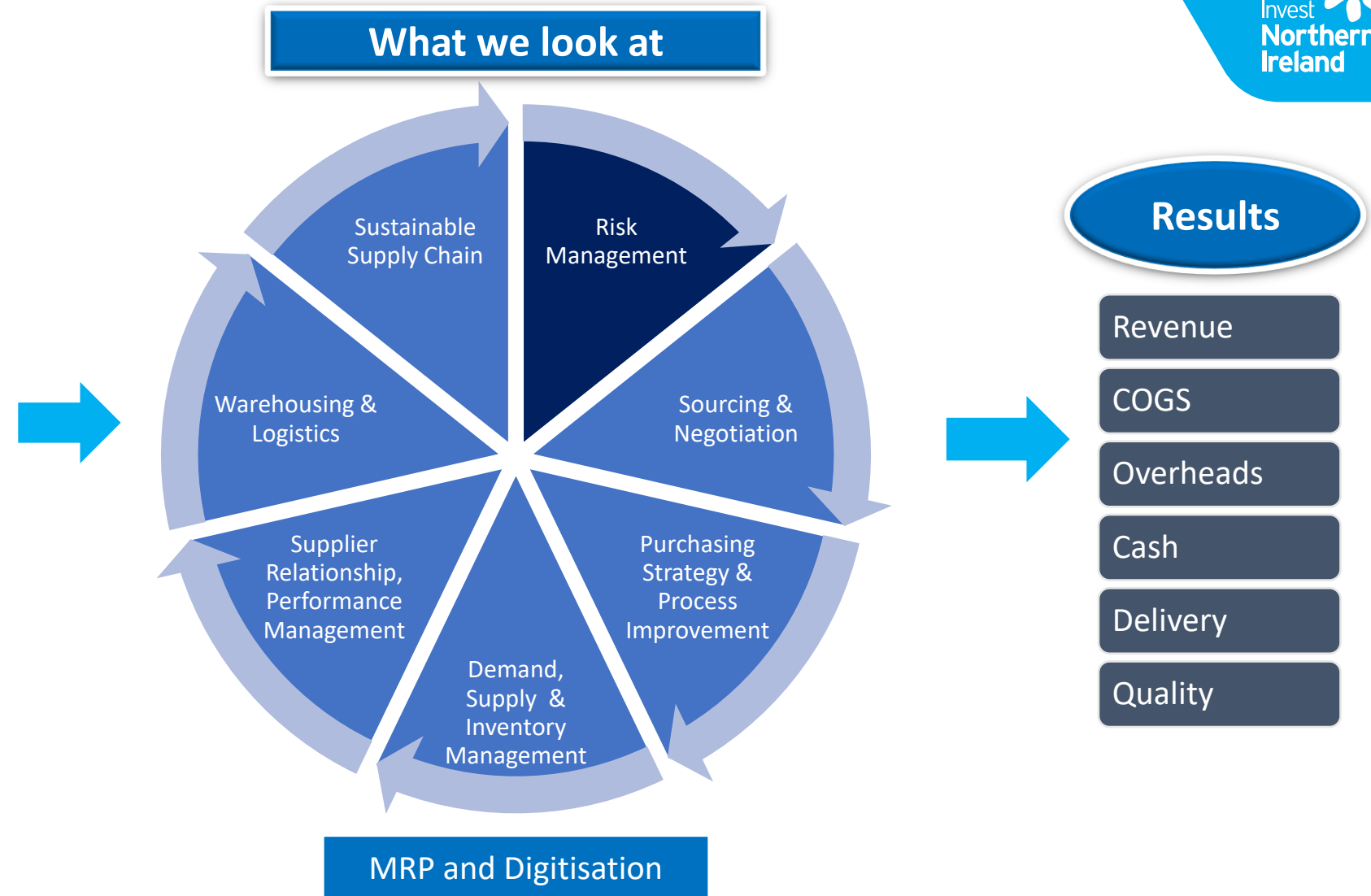
Team of experienced supply chain professionals

## What we do

Develop the supply chain capability of businesses to:

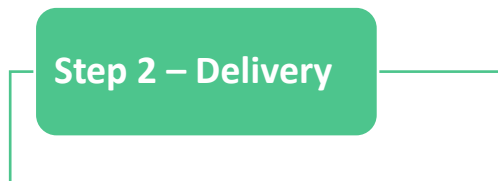
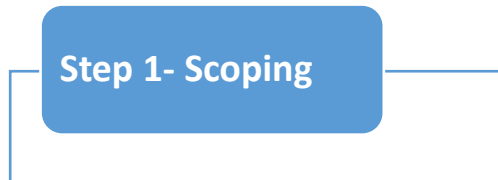
- Improve their **resilience**
- Enhance **value**
- Reduce **risk**
- Improve **competitiveness**
- Identify **opportunities**

Driving productivity



Service is free to companies participating in the programme (eligibility criteria apply - >£100K spend )

# How we do it - Building resilience and capability



## Changing the supply chain mindset



## Example project areas



## Engagement model:

**ONE : MANY : ALL**

One to many capability uplift + targeted one-to-one follow through

Complemented by training, coaching and mentoring companies to deliver sustainable supply chain improvements & build capability

# Supply chain resilience



**Increasing costs**  
(pending quotas)



**Supply chain support –  
helps to mitigate impact**

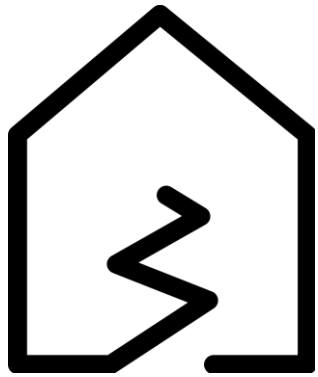
Supply chain controls **material cost**  
Supply chain affects **labour and overhead costs**  
Supply chain has a direct bearing on **cash and  
inventory**



**Driving productivity**

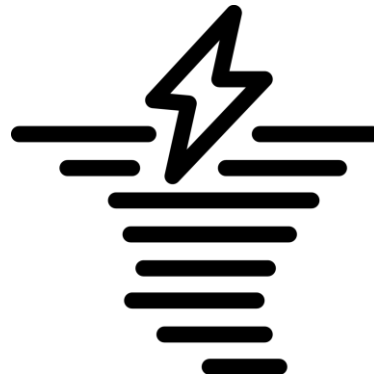


## The supply chain risk equation



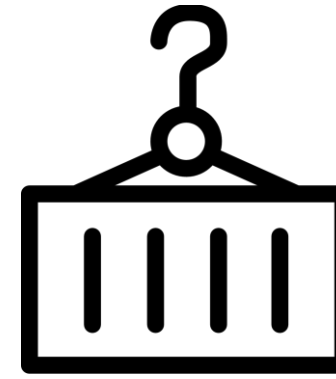
### Vulnerability

Characteristics of the supply chain that make it vulnerable to disruption



### Unexpected event

Occurrence of events that could result in a negative impact on the supply chain



### Supply chain risk

Supply chain disruption that results in operational or financial impact

Supply chain risk arises at the intersection of vulnerability and exposure to unforeseen events.

# Why supply chain risk matters

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## **Cost optimised supply chains**

Past supply chains focused on cost, scale, and efficiency but created structural fragility.

## **Evolving risk landscape**

Recent global events exposed vulnerabilities requiring strategic focus on supply chain risks.

## **Strategic risk management**

Supply chain resilience builds capability to absorb shocks and recover faster than competitors.

## **Competitive advantage**

Resilience as a strategic capability enables proactive decision-making and protects market share.

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**From cost optimisation to strategic risk management**



# Risk management – key elements



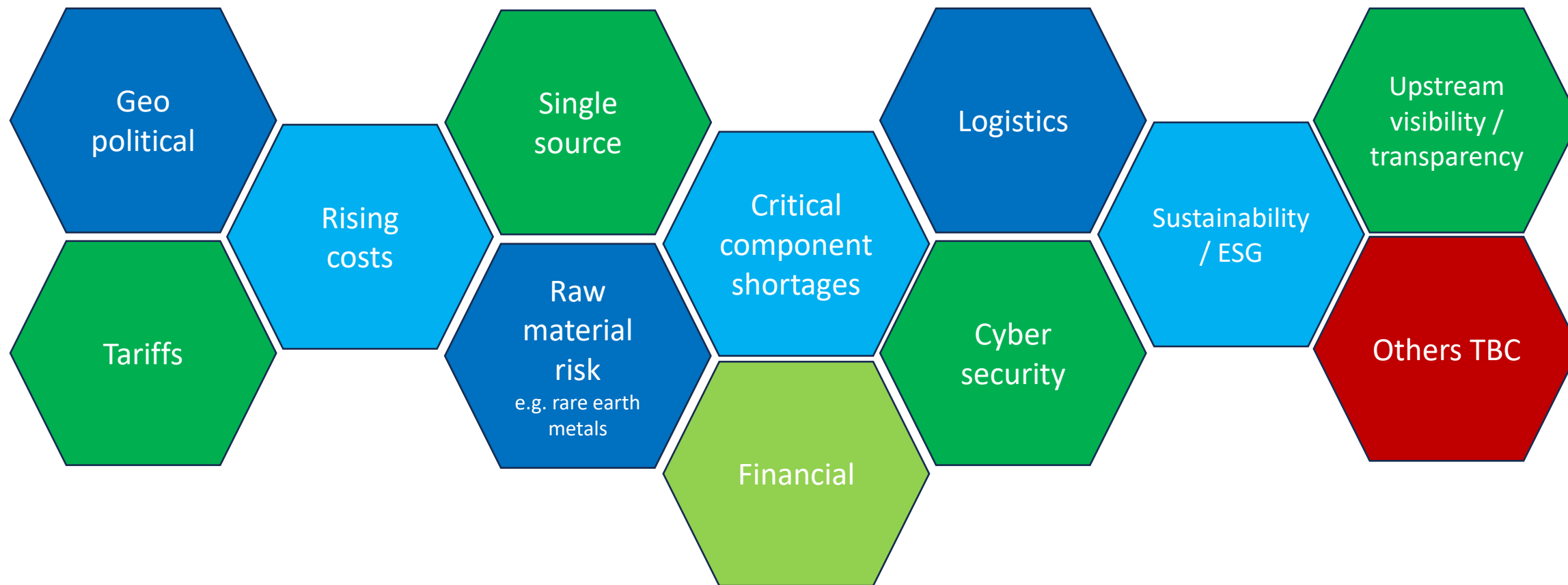
Beginning

Intermediate

Advanced



# Key supply chain risks



**Simultaneous risk interactions**

# Risk register

## Risk Register

Ref	Risk Description	Impact Description	Impact Level	Probability Level	Priority Level	Elimination / Mitigation Notes	Owner
	<i>Brief summary of risk</i>	<i>What happens if Risk not Eliminated or Mitigated</i>	<i>Rate 1 (Low) to</i>	<i>Rate 1 (Low) to</i>	<i>Impact X</i>	<i>What can be done to lower or eliminate impact or probability</i>	<i>Who is responsible</i>





# Risk register – prioritising risk

Supplier	Impact				Impact Score	Likelihood					Likelihood Score	Overall Score
	% of spend (0-5% 1, 5-15% 2, >15% 3)	Supplier Profile (Routine 1, Leverage 2, Bottleneck 3, Strategic 4)	Alternative Supplier ("Yes" 1, "No" 3)	Re-Source Risk (Low 1 Medium 2, High 3)		Supplier Location (GB 1, EU/US 2, ROW 3)	Up-Stream Location (GB 1, EU 2, ROW 3)	Quality Performance (Good 1, Fair 2, Poor 3)	Delivery Performance (Good 1, Fair 2, Poor 3)	Credit Score (Good 1, Fair 2, Poor 3)		
Supplier A	5% (2)	Strategic (4)	No (3)	High (3)	12	Leeds (1)	GB (1)	Good (1)	Good (1)	Fair (2)	6	72
Supplier B	2% (1)	Bottleneck (3)	No (3)	High (3)	10	USA (2)	Mexico (3)	Fair (2)	Poor (3)	Poor (3)	13	130
Supplier C	25% (3)	Leverage (2)	Yes (1)	Low (1)	7	France (2)	China (3)	Good (1)	Fair (2)	Good (1)	9	63

Supplier B needs mitigation actions

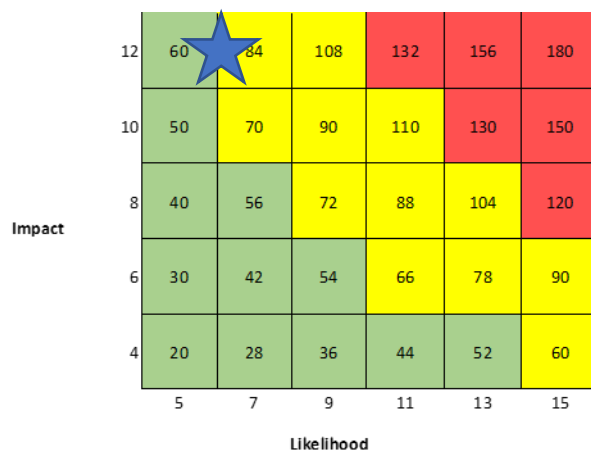


# Linking risks to strategy

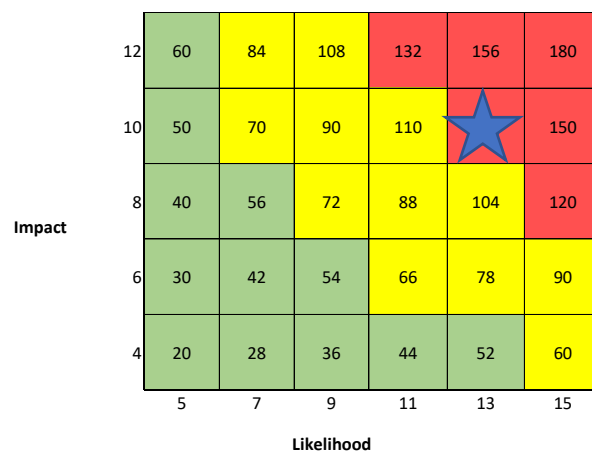
Risk Appetite – Willingness to seek or accept risk

Risk Tolerance – Ability to manage risk – Set the boundaries

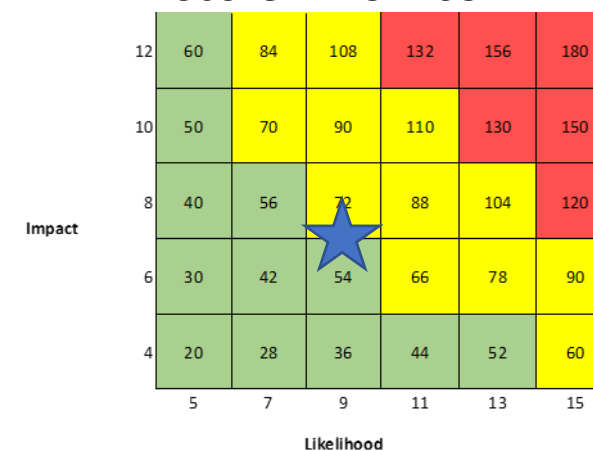
**Supplier A – Strategic**  
Score  $12 \times 6 = 72$



**Supplier B – Bottleneck**  
Score  $10 \times 13 = 130$



**Supplier C – Leverage**  
Score  $7 \times 9 = 63$



**Mitigation** - Identify alternative supplier



# Supply chain resilience

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**A strategy without a  
supply chain strategy  
isn't a strategy**

**Resilient, agile, sustainable**



# Mitigating risk – other actions



**Consider total cost  
of acquisition**

## Supply diversification

Reducing reliance on single suppliers or countries lowers risk but requires selective application to avoid complexity.

## Regionalisation and nearshoring

Sourcing closer to end markets balances cost with continuity and reduces exposure to geopolitical and transport risks.

## Strategic buffers

Inventory, capacity, and logistics buffers protect supply chains when designed with segmentation over blanket stock increases.

## Contracts and governance

Service agreements and clauses for exceptional events help manage commercial risks during disruptions.





## Early risk identification / enhance visibility

Identify risks early by understanding critical products, suppliers, and supply chain routes with a prioritised exposure view.

## Deliberate risk mitigation

Apply the right mitigation levers like:

- Supplier diversification,
- Reshoring/near shoring,
- Set inventory buffers based on criticality and impact
- Review contracts to reduce exposure and improve readiness.

## Building structural resilience

Embed governance, cross-functional ownership, define KPI's and embed regular reviews into management processes to enhance resilience and quick recovery.

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## Case Study



<https://www.youtube.com/watch?v=ltwmfxD7FBU>



To access our SCRDS support, speak to your Invest Northern Ireland client executive or go to the website for further details

[investni.com/supplychainsolutions](https://investni.com/supplychainsolutions)

Service is free to companies participating in the programme (eligibility criteria apply - >£100K spend )

**Supporting companies to develop supply chains to support their growth ambitions**

# Further support

## Case Study



<https://www.youtube.com/watch?v=ltwmfxD7FBU>



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**Thank you**

