



Business and Trade Committee

House of Commons, London SW1A 0AA

020 7219 4494 - Commonsbtc@parliament.uk - www.parliament.uk/CommonsBTC - [@CommonsBTC](https://twitter.com/CommonsBTC)

Rt Hon Douglas Alexander MP
Minister of State for Trade Policy and Economic Security
Department for Business and Trade
Old Admiralty Building
Admiralty Place
London
SW1A 2DY
[By email]

16 April 2025

Dear Douglas,

As you know, in March 2025 the US government reintroduced tariff measures relating to certain steel and aluminium and 'derivative products' imported from the UK and other countries (referred to as "Section 232" measures). It also introduced 25% tariffs on automobiles under Section 232 legislation, effective on or after 3 April, and on automotive parts no later than 3 May. Finally, in April 2025, an additional 10% tariff was placed on top of existing US duties, fees and taxes on all imports from the UK under the International Emergency Economic Powers Act (1977).¹

UK Government Response and consultation

On 3rd April 2025, your department [invited](#) UK companies to give their views, through a 'Request for Input', on what any future UK response should look like, and in particular to identify products whose inclusion would have a more limited impact on the UK.

While all US-origin goods are within scope of the consultation, the Government has also [published](#) an 'Indicative Long List' of US products to assist businesses in considering the impact of any potential future UK tariffs. We note that the indicative list contains products that the government would most likely draw upon, in developing any tariff response to US measures, and encompasses around 27% of UK imports of US-origin goods.

Whilst we welcome the Government's measured approach to considering its response to tariffs and its desire to consult business about the likely impacts, we have a number of

¹ These additional 10% tariffs do not apply to US imports of:

- steel and aluminium articles and automobiles/automobile parts which are, or will be, subject to separate additional 25% tariffs
- copper, pharmaceuticals, semiconductors and lumber
- energy, energy products and other minerals not available in the US.

questions and comments about the design of the consultation aimed at ensuring this approach is as effective as possible at enabling businesses to engage.

The Committee notes that respondents are asked to provide six data points per product²: (a) average imports from the US over the past three years, (b) the likely impact of a higher UK tariff on US-origin imports, (c) the ability to source the product from elsewhere, (d) the location of any alternative source, (e) the impact on cost and quality of sourcing alternatives, and (f) any further feedback, including knock-on effects across supply chains.

However, the Government's 'Indicative Long List', intended to guide responses, includes 8,374 products. Even if respondents only import a small fraction from the US, the time and resource burden involved in researching and responding at a product-specific level is substantial. For many firms, particularly SMEs, it is wholly impractical. Moreover, the level of granularity requested assumes that manufacturers track trade data, alternative sourcing options, and tariff sensitivities at the product level—something that is rarely the case outside of the largest multinationals.

While we understand that any eventual tariff response would have to be applied at the product level, we believe the current consultation design risks excluding a significant proportion of affected businesses from meaningful engagement and skewing input toward those few with significant internal capacity and trade expertise.

Therefore, in considering how you may address the above concerns, please can you answer the following questions:

- **Does the Department believe that a product-level consultation is a realistic way to gather the information needed to inform tariff decisions?** Given the complexity of global supply chains, what assessment was made of the suitability of this approach compared to alternatives?
- **To what extent did the Department consider the capacity of UK businesses to respond to the consultation at the requested level of granularity?** Specifically, was any assessment made of the resource burden this would place on small and medium-sized enterprises, and how that might affect the diversity and representativeness of responses?

² Respondents are asked to provide answers for each relevant 8-digit Combined Nomenclature (CN8) code. The Combined Nomenclature is a hierarchical classification system used in international trade, in which CN8 codes are assigned to goods based on their nature and physical characteristics, allowing for detailed identification and consistent reporting across customs and trade measures.

- **Will the Department consider allowing respondents to provide feedback at a broader product category or sectoral level, where appropriate, rather than requiring detailed responses at the level of individual tariff lines?**
- **How does the Department intend to analyse and weigh the information gathered through this consultation alongside other stated considerations, such as wider economic impacts, international obligations, and strategic trade objectives?** Given the scale and complexity of the data collection exercise, how will the Department ensure that this process delivers meaningful and actionable insight, rather than placing a disproportionate burden on businesses?
- **What analysis was undertaken to develop the Indicative Long List of 8,374 products?** In particular, what criteria were applied to identify these products from the broader pool of US-origin imports?
- **Will you undertake to publish a summary of the consultation responses, including the impact of those responses on any potential Government action, in a format that is comprehensible to Parliament and the wider public?**

I would be grateful for a response by 25 April 2025 in order to enable us to input further before the consultation closes on 1 May 2025.

Yours sincerely

A handwritten signature in black ink, reading "Liam Byrne". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Chair of the Business and Trade Committee