



Procurement Policy Note

Procuring steel in government contracts

Action Note: 022

Previously issued: February 2025

Updated: June 2025

Issue

1. The Government wants to ensure that public procurement plays its full role in delivering the [Industrial Strategy](#) and fostering a resilient economy that supports British businesses and creates good jobs in communities across the country. UK-produced steel has a significant role to play in construction and infrastructure projects. This Procurement Policy Note (PPN) replaces PPN 010.

Dissemination and scope

2. This PPN applies to all central government departments, their executive agencies and non-departmental public bodies when awarding public contracts¹ for goods, services and/or works, and including special regime contracts², where steel is being procured directly or indirectly (referred to as 'relevant steel procurement'). Such bodies are referred to as 'in-scope organisations'.
3. Please circulate this PPN within your organisation, particularly to those with a commercial, procurement and/or contract management role. It may also be relevant to those in finance, operational and sustainability roles.
4. Other public sector contracting authorities are encouraged to consider applying the best practice set out in this PPN, as appropriate.

Timing

5. In-scope organisations should note that the additional requirements at 7a) and 7b) will take effect from 1 September 2025.

¹ See [section 3 of the Procurement Act 2023](#)

² See [section 10\(6\) of the Procurement Act 2023](#)

Action

6. This PPN replaces PPN 010 and reflects changes to the project appraisal and commercial policy landscape which have occurred since PPN 010 was published. In-scope organisations are required to have consideration for the [Green Book](#), the [National Procurement Policy Statement](#), the [Construction Playbook](#) and the [Social Value Model](#) when designing relevant steel procurements and apply them in accordance with the instructions set out in each case. Further details relating to their application are contained within the attached guidance.
7. In addition, from 1 September 2025, for all new relevant steel procurements, in-scope organisations are required to:
 - a) Consult [UK Steel's Digital Catalogue](#)³ prior to design and procurement decisions being made. Include a contract clause which extends this obligation to Tier 1 contractors and their subcontractors (where relevant).
 - b) Consider if the national security exemption in paragraph 25 of Schedule 2 to the Procurement Act 2023 is relevant to the procurement and apply as appropriate.
8. In applying this PPN in-scope organisations and other public sector contracting authorities (where appropriate), must comply with their legal obligations and in particular the obligation not to discriminate against treaty state suppliers or to treat suppliers differently without justification.

Monitoring and compliance

9. In-scope organisations are required to provide an annual steel data return⁴ to the Department for Business and Trade (DBT), which is collated and published on Gov.uk. This consists of (a) pipeline data of projected steel requirements; and (b) actuals data on steel procured in the previous year – including quantity, product type, and origin data.
10. In relation to 9(b) above, the requirement applies to projects/programmes:
 - a) With a value of £10 million or more; or
 - b) Where it is anticipated that the project will require in excess of 500 tonnes of steel.
11. Actuals data should be submitted no later than 10 weeks after the end of the financial year by the contractor to the relevant in-scope organisation. The steel origin data should be recorded as set out in the Inspection Certificate (EN10204 Type 3.1) and contractors should indicate whether the origin stated is also recorded in the certificate as where the steel was melted and poured. The data will then be consolidated by the in-scope organisation into their annual steel data return to DBT.
12. Where the in-scope organisation is an executive agency or a non-departmental public body, their data should be submitted to their parent department who is responsible

³ The Catalogue is compiled by UK Steel and as such the Cabinet Office is not responsible for the accuracy of the information it contains, nor for its ongoing availability. Nothing in the Catalogue removes an in-scope organisation's requirement to comply with any legal obligations and in particular the obligation not to discriminate against treaty state suppliers or to treat suppliers differently without justification.

⁴ This applies to domestic projects/programmes only

for collating and submitting the data return to DBT.

13. The guidance to this PPN sets out the full requirement, including the steel product types that fall within the scope of the requirement. An example clause, to help ensure the data requirements are pushed down to suppliers through contractual terms and conditions, is also provided.

Background

14. The UK steel sector plays an important role in our economy, providing high quality steel products and helping to deliver our country's infrastructure. The public sector is an important buyer of steel, procuring it both directly and indirectly, to build critical infrastructure such as our railways, roads, buildings, defence equipment, schools and hospitals.
15. Engaging early with steel producers and fabricators will help in-scope organisations understand the range of solutions and options available from the market and the deliverability of their requirements. An accurate assessment of the capacity and capability of the UK market should form an important part of this – particularly given global supply chain pressures and potential supply chain reliability issues. Consulting UK' Steel Digital Catalogue, prior to design and procurement decisions being made, will help in-scope organisations to understand what types of steel are manufactured in the UK and how UK steel products are specified.
16. Paragraph 25 of Schedule 2 to the Procurement Act 2023 provides that, where a contracting authority determines that a contract should not, in the interests of national security, be subject to the Act (or a part of the Act), that contracting authority may determine that the contract is exempt from most regulatory requirements in the Act, including the requirement to compete the contract. Using the national security exemption lawfully effectively ensures that procurements for vital goods, services and works in the UK, maintain maximum commercial flexibility from the earliest stage in the procurement lifecycle.

Contact

17. For questions relating to this PPN, please refer to the Frequently Asked Questions attached. Any other queries should be directed to the Crown Commercial Service Helpdesk on 0345 410 2222 or info@crownccommercial.gov.uk