



## Procurement Policy Note 022

# Procuring steel in government contracts

### Frequently Asked Questions

Updated: June 2025

#### General

**Q. Why is the steel procurement policy being updated?**

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.

**Q. What are the key updates contained within the PPN and guidance?**

PPN 022 replaces PPN 010 and reflects changes to the project appraisal and commercial policy landscape which have occurred since PPN 010 was published. 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](#)<sup>1</sup> 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.

**Q. Why are in-scope organisations required to consult UK Steel's Digital Catalogue?**

An accurate assessment of the capacity and capability of the UK market should form an important part of your pre-procurement activity, particularly given global supply chain pressures, and potential supply chain reliability issues, that have been exposed

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<sup>1</sup> 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.

through the COVID-19 pandemic and the invasion of Ukraine. Consultation of UK Steel's Digital Catalogue, will help in-scope organisations to understand the range of solutions and options available from the UK market and the deliverability of their requirements.

**Q. When should in-scope organisations consult UK Steel's Digital Steel Catalogue?**

In-scope organisations should consult UK Steel's Digital Catalogue prior to design and procurement decisions being made. The preliminary market engagement stage (or earlier if designs are commissioned in advance of preliminary market engagement) is one example of when the Catalogue may be consulted.

**Q. Does the requirement to consult UK Steel's Digital Catalogue extend to the contractors and subcontractors of in-scope organisations?**

Yes. Where steel is to be procured indirectly through a Tier 1 contractor or one of its subcontractors, in-scope organisations should include in contracts an obligation based on the attached example clause.

**Q. What is the National Security Exemption in the Procurement Act?**

Paragraph 25 of Schedule 2 to the Procurement Act 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. National security is not defined in the Act to ensure that it is sufficiently flexible to protect the UK's national security interests.

**Q. Does the National Security Exemption apply to steel procurements?**

A decision to apply the exemption can only be made in the interests of national security. Reliance on the exemption is likely only to be appropriate where the contracting authority considers that it is necessary for the protection of the essential security interests of the UK and that the procurement in question is indispensable for national security purposes. That does not mean national security does not have an important economic dimension, as it can be understood as the protection of infrastructure and activities that are critical for the functioning or stability of the economy.

Steel can be key to many infrastructure projects. Increased reliance on imported steel in procurements (which are indispensable for national security) can lead to potential disruptions to supply chains, creating vulnerabilities including price fluctuations, political instability, or even malicious interference. This could impact essential services like defence, transportation, and energy, potentially leading to widespread disruptions and compromising national security.

**Q. Do the changes and obligations introduced under PPN 010 still apply?**

This PPN replaces PPN 010. The PPN reflects changes to the project appraisal and

commercial policy landscape which have occurred since PPN 010 was published including the retirement of the Project/Programme Outcome Profile. In-scope organisations are still 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, as well as other best practice contained within the guidance.

**Q. Who does this PPN and guidance apply to?**

This PPN applies to all central government departments, their executive agencies and non-departmental public bodies when awarding public contracts<sup>2</sup> for goods and/or services and/or works, and including special regime contracts,<sup>3</sup> where steel is being procured directly or indirectly (referred to as 'relevant steel procurement'). Such bodies are referred to as 'in-scope organisations'.

**Q. Is the PPN and guidance applicable to the wider public sector?**

Other public sector contracting authorities are encouraged to consider applying the best practice set out in the guidance, as appropriate. They should do so, in accordance with the relevant instructions in each case and in light of any relevant legal obligations which may apply.

**Q. Does the PPN and guidance apply to frameworks?**

This guidance also applies to covered procurements establishing frameworks under the Procurement Act 2023. This guidance applies only as appropriate for call-off contracts, for example, effective contract management of call-off contracts is important to ensure that contractual obligations, including those in relation to steel, are being met. In-scope organisations should refer to the relevant policy, tool or methodology for specific guidance on their application to frameworks and contracts awarded in accordance with a framework agreement.

**Q. When does the PPN apply from?**

New requirements relating to consultation of UK Steel's Digital Catalogue and consideration of the national security exemption will take effect from 1 September 2025.

## **Monitoring and compliance**

**Q. Which organisations do the actuals data collection requirements apply to?**

The data requirements apply to all in-scope organisations, where the actuals data on steel procured (and delivered) on projects/programmes in the previous financial year has:

- i) A value of £10 million or more; or
- ii) Where it is anticipated that the project will require in excess of 500 tonnes of steel.

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<sup>2</sup> See [section 3 of the Procurement Act 2023](#)

<sup>3</sup> See [section 10\(6\) of the Procurement Act 2023](#)

**Q. What is the difference between the actuals and the pipeline data?**

Actuals data is backward looking. It contains data on the steel procured (and delivered) in the previous financial year.

Pipeline data is forward looking. It aims to inform interested organisations (such as steel producers, manufacturers, stockists etc.) about potential future opportunities.

**Q. What counts as actuals data? Is it when contracts for the supply of steel to public projects/programmes are placed?**

Only steel procured and delivered to the project/programme site, within the previous financial year, counts as actuals data. Where contracts for supply of steel have been awarded, but no delivery of steel to site has taken place, data on these contracts does not count as actuals data.

**Q. Why are the data collection thresholds not based on contract value?**

The requirement applies to all projects/programmes worth over £10 million, or where it is anticipated that in excess of 500 tonnes will be needed.

The combination of the project value/tonnage threshold, alongside the exact scope of the requirement (including the list of steel product categories that the requirement applies to) ensures the right balance is struck in terms of getting meaningful data, but without making the process burdensome for suppliers and subcontractors.

**Q. Is the origin of steel recorded within the actuals template always indicative of where the steel was melted and poured?**

No. Not all Inspection Certificates EN10204 Type 3.1 contain the information. The data collection template enables users to indicate if the origin recorded within the inspection certificate that accompanied the steel to site, is also where the steel was melted and poured.

**Q. Are suppliers required to trace where the steel was melted and poured if the inspection certificate does not contain the relevant information?**

No. Only use Inspection Certificates EN10204 Type 3.1 that accompanied the steel delivered to site. If the certificate does not indicate where the steel was melted and poured, then record the origin and indicate that it is not where the steel was melted and poured.

**Q. Is the exact phrase 'melted and poured in (name of country)' required for suppliers to record the origin as also being the place that the steel was melted and poured?**

No. There may be some variations in the exact wording used in the certificate concerning melted and poured location. 'Melted and poured in (name of country)', 'Melt and pour location (name of country)', or 'Melted, poured and manufactured in (name of country)' are all acceptable – as is any phrase which clearly conveys where the steel was melted and poured.

**Q. When should in-scope organisations submit the data to the Department for Business and Trade?**

The 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. These returns will then be consolidated by the in-scope organisation into their annual steel data return to the Department for Business and Trade (DBT). In-scope organisations should encourage their suppliers to collect data in real time as steel is delivered to site, in order to avoid having to do this retrospectively at the end of the year.

**Q. Where the in-scope organisation is an executive agency or non-departmental public body, should they send their data returns directly to DBT?**

No. Executive agencies and non-departmental public bodies should submit their data to their parent department, who is responsible for collating and submitting the data return to DBT. For example, the Environment Agency would submit their data to the Department for Environment, Food & Rural Affairs who would consolidate the data and submit to DBT.

**Q. Do in-scope organisations have to use the steel product and origin data requirement contract clause provided, within their contracts?**

No, this is provided as an example. However, we advise in-scope organisations to make contractual provisions to ensure that the suppliers are aware of the requirements at the outset and are able to start the data collection as soon as steel deliveries to their respective sites commence.

**Q. Is the steel products list exhaustive?**

The list of product headings is exhaustive (e.g. flat rolled steel products, steel plate etc.). The list of product examples set out under each heading is not exhaustive. For example, the list under flat rolled steel products – products commonly referred to as hot and cold rolled coil, sheet, and strip, including those clad, plated, and galvanised. This will include products such as coated steel building panels, tinmill steel, or corrugated sheeting and is not exhaustive.

## **Contact**

**Q. What if I have a question which is not covered here?**

If you have a question which is not covered in the PPN, guidance or these FAQ, in the first instance please contact Crown Commercial Service Helpdesk on 0345 410 2222, or [info@crownccommercial.gov.uk](mailto:info@crownccommercial.gov.uk)