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Application for a Tariff rate Quota review on safeguarding on Quarto Plate otherwise referred to as Hot Rolled plate or Reversing Mill Plate under heading numbers:

ISTA are requesting the Trade Remedies Authority to begin a review on the Tariff Rate Quotas on the following commodity codes.

7208 5191 Flat rolled products of iron or non-alloy steel, of a width of >=2050mm, not in coils, simply hot rolled, not clad, plated or coated of a thickness of >10mm but <15mm, without patterns in relief (excl. wide flats)
7208 5291 As above, of a width of >=2050mm of a thickness of >=4.75mm but <=10mm
7208 5198 As above, of a width of <2050mm of a thickness >=10mm but <=15mm
7208 5120 >15mm no width restriction
7208 5299 4.75mm-10mm <2050mm wide

There is No Domestic Production:

There is an absence of a UK Like Product.

The core and most compelling argument is that Non Alloy and other alloy quarto plates are not manufactured in the UK in widths in excess of 2050mm. They are also not being manufactured in thicknesses below 15mm.
There is only one manufacturer of Non Alloy and other Alloy Quarto Plates in the UK and they do not manufacture any widths in excess of 2050mm or below 15mm and there is no current or planned production capacity for these sizes.

Therefore there is no domestic 'like product' in the sense defined under WTO rules, meaning import cannot cause injury to UK producers, which is a precondition for safeguarding.

Market Necessity.

Products are essential and not substitutable.
Quarto Plate in excess of 2050mm widths have a unique and critical industrial role.
It is used in the following industries;

Construction
Agriculture
Government and Municipalities - for example, Highway Maintenance, Waste and Recycling, Winter maintenance, Landscaping, ground care and forestry,

Utilities, Public Building Maintenance,
Zero Emissions - Hydrogen combustion powered machines
Emergency services
Bridge Building,
Wind Turbines
Ministry of Defence shipbuilding
Heavy machinery typically produced in the UK by Caterpillar and JCB

There is no viable substitute produced in the UK. Domestic producers cannot meet functional, safety or design standards required by end users for these applications.

For this reason Quarto Plate which is in excess of 2050mm in width and between 4.75mm and 15mm in thickness must be imported.

It is not possible to make a 'patchwork' of widths to achieve the widths required, most importantly from a structural safety point of view but also considering aesthetics, durability and cost efficiency.

Using narrower widths of reversing mill plate <2050mm for the industries listed above is not feasible nor efficient due to several technical, economic, and structural reasons:

Wide plates minimize the number of weld seams required to fabricate large structures.

Welded seams are always weaker than continuous plate material and increase the risk of cracks, leaks, or failure under high stress.

Example: In shipbuilding, using narrow plates would require many additional weld seams along the hull, increasing structural weakness and inspection complexity**.**

Fabrication Efficiency

Large structures (ships, wind towers, bridges) are designed to be made from large steel sections to reduce fabrication steps. Narrow plates would require more cutting, aligning, and welding as well as more labour time and higher manufacturing costs. This goes against the economies of scale principle for heavy industries.

Mechanical Performance

Every welded seam introduces residual stresses, potential defects, and discontinuities in the structure being manufactured. Components like pressure vessels, pipelines, and storage tanks need homogeneous, continuous plate sections to withstand internal pressures and cyclic stresses without weak points.

Dimensional and Design Requirements

Many components have very large circumferences or panel sizes, requiring wide plates to avoid patchwork assembly.

Example:

- A wind tower section can have a diameter of 5–10 m.
- Using for example 1200 mm wide plates would mean 4–8 longitudinal welds per ring section, increasing production time and potential defect locations.
- Using for example 1500mm wide plates would mean 3 – 7 longitudinal welds per ring section, increasing production time and potential defect locations.
- Using for example a 3000mm wide plate would mean 2-4 longitudinal welds per ring section reducing production time and defect locations

Surface Quality and Corrosion Resistance

- Fewer welds mean fewer heat-affected zones (HAZ) that are prone to:
- Microstructural changes (weaker metal in weld zones)
- Corrosion initiation sites (especially for offshore and marine environments)
- Wide plates reduce these vulnerabilities significantly.

Safety and Regulatory Standards

Shipbuilding, pressure vessel manufacturing, and oil & gas structures are heavily regulated.
Classification societies often mandate a minimum plate width to ensure fewer welds, better fatigue resistance and higher structural reliability

Scenario Why a 1500 mm Quarto Plate Cannot Substitute. a >2050 mm Plate in Heavy Machinery Production (company name redacted in public version due to commercial sensitivity)

<u>One-Piece Structural Components Require Wide Plate</u>

In heavy machinery production—bulldozers, excavators, loaders—often uses large, monolithic components (e.g., chassis rails, undercarriage beams, blade mounts) that exceed 1500 mm in width. Attempting to build these with multiple narrower plates (e.g., 2×1500 mm) requires welding, which Introduces potential weak points and violates the design philosophy of one-piece, high-integrity parts. Many critical welds would be in primary load paths, which is unacceptable in high-stress, high-fatigue environments like mining and heavy construction.

<u>Engineering Specifications Demand Wide Plate Geometry</u>

Heavy machinery designs are optimized around specific plate widths and thicknesses, often >2050 mm. Replacing wide plate with narrower segments alters load distribution, stiffness, and stress concentration patterns which would compromise fatigue life, violate OEM mechanical specs and would require entire system requalification (FEA, destructive testing, field validation)

<u>Welding Narrow Plates Adds Cost, Time, and Complexity</u>

Manufacturing large components from 1500 mm-wide plates requires beveling, aligning, welding, and inspecting every joint and additional post-weld heat treatments and non-destructive testing (NDT). These steps slow production, increase costs and raise the risk of failure.

For global-scale production, this is economically and operationally unsustainable.

<u>Loss of Flatness and Distortion Control</u>

Quarto plate >2050 mm ensures flat, consistent geometry, uniform thickness and stress distribution.

When welding 2×1500 mm plates heat distortion is common and precision flatness required for high-performance assemblies is hard to maintain, this leads to poor fit-up, stress risers, and misalignment

<u>Supply Chain and Quality Consistency</u>

Heavy machinery companies source high-grade plate steel (e.g., ASTM A514, Hardox, or custom spec) in widths exceeding 2050 mm to standardize production globally. Switching to narrower plate complicates procurement, requires new vendor approval and breaks production standardization, increasing QA complexity

Conclusion

A 1500 mm-wide quarto plate cannot be substituted for a >2050 mm-wide plate in heavy plant machinery because:

It compromises structural integrity
Increases fabrication complexity
Violates OEM engineering standards

Undermines performance, durability, and quality control

Scenario – Wind Turbine Tower Fabrication

Wind turbines require large steel tower sections made from rolled plate.
A modern onshore 5 MW turbine tower base section requires plate width: 2500 mm (>2050 mm), thickness: 60–80 mm, length: 12–15 m made of high-strength structural steel (S355NL, EN 10025-3 or ASTM A572). These plates are rolled into cylindrical shells that are welded together to form the tower.

Attempted Substitution

If a supplier proposes to use 1500 mm-wide plates, either using narrower shell segments (more plates per tower ring), or welding two or more plates to create the required width this would not work for the following reasons,

Technical Limitations of 1500 mm Plate

A) Increased Number of Welds leads to structural integrity risk. A tower base has a circumference ≈ 7.5 m (7500 mm). By using 2500mm width plates, there would be 3 plates per ring with 3 longitudinal weld seams. By using 1500mm plates, there would be 5 plates per ring and 5 weld seams. The problem with that being that each weld is a potential fatigue crack initiation site under cyclic wind loads (millions of cycles over 20+ years).

More welds result in higher failure probability, requiring extra inspection and maintenance.
A reduced fatigue life, brings the risk of tower failure and expensive downtime.

B) Residual Stress and Dimensional Issues

Additional weld seams or welded strips introduce residual stresses and distortion during rolling into cylindrical sections. Non-uniform thickness results in assembly fit-up problems, leading to out-of-round towers.

Misalignment affects turbine aerodynamics, potentially reducing energy output.

Commercial Limitations of 1500 mm Plate

A) Increased Fabrication Costs. Using a plate which is 2500mm+ in width results in having 3 plates per ring. Using a plate which is only 1500mm in width would result in having 5 plates per ring. This would incur extra welding costs for 2 extra full-length welds per ring. It would also result in additional submerged arc welding, grinding, and quality inspection leading to longer production times

Each additional weld seam adds 4–6 hours welding plus 3–5 hours quality inspection and rework which would increased bottlenecks in production lines, reducing total turbine output.

Conclusion

A 1500 mm reversing mill plate cannot substitute a >2050 mm plate in wind turbine production due to structural reasons - more weld seams reducing fatigue life, increased crack risks. This compromises tower safety under dynamic wind loads. Also for dimensional reasons as additional welded joints introduce residual stress, causing tower distortion and assembly issues. Furthermore, utilising non-standard plate widths may fail certification requirements, preventing commercial deployment. Finally, for commercial reasons. An increased number of welds increases fabrication cost, production time, and long-term maintenance expenses, making turbines less competitive and delaying project returns.

Scenario – Shipbuilding Steel Plate Requirements

Shipbuilding involves large structural plates used in Hull plating (side shell, bottom, deck), bulkheads, tank walls and superstructure panels.

For Example. To build a Panamax-size bulk carrier or container ship the typical plate width used is 2500–3000 mm (>2050 mm) with a thickness: 20–50 mm (varies by location) in lengths of 12–18 metres. The quality of this steel is marine-grade steel (e.g., AH36, DH36 per ASTM A131 or equivalent ISO standards). The large width ensures fewer welded joints in the hull, enhancing strength, water tightness, and corrosion resistance.

Attempted Substitution

If it were proposed to utilise 1500 mm-wide reversing mill (quarto) plates instead of the required 2500+ mm plates, it would be necessary to reduce the panel width meaning more strips welded side by side or to pre weld plates before assembly to create wider panels. There are technical limitations of utilising 1500 mm Plate in Shipbuilding. An increased number of weld seems means a hight risk of hull failure.

Example: A 20 m x 12 m deck panel, using 2500mm width plates would have 4 seams. Using 1500mm plates would result in having 7 seams. The consequences of having each additional seam are that there are stress concentrations, which under wave impact and cyclic loading can cause fatigue cracking. This can lead to potential leakage points (especially critical in tankers).

More weld seams create higher risk of water ingress or catastrophic hull failure.

Residual Stresses and Distortion

Multiple longitudinal weld seams increase heat input during assembly which leads to plate distortion, requiring extra straightening. It also causes misalignment, making it harder to meet tight dimensional tolerances. This leads to weaker structural integrity, especially in areas like deck plating or side shell exposed to high wave slamming forces.

Reduced Corrosion Protection Efficiency

Coating and painting ship panels is easier on large, continuous plates. By having multiple weld seams, the likely result would be crevices and rough surfaces , making coatings less effective creating corrosion sites, especially in saltwater environments.
This shortens ship service life and increases long-term maintenance costs.

Regulatory and Classification Issues

Ship hulls must comply with standards from classification societies (e.g., ABS, DNV, LR). Use of narrow plates with excessive weld seams can cause failure to meet fatigue strength requirements. It can also cause failure of non-destructive testing (NDT) checks for lamination, porosity, or undercut weld defects. These factors can result in class rejection, delaying delivery and incurring rework costs.

Conclusion

A 1500 mm reversing mill plate cannot substitute a >2050 mm plate in shipbuilding for technical reasons – more weld seams reduce structural integrity, increase fatigue failure risk, and compromise watertightness. Distortion, coating difficulties, and long-term corrosion issues would be amplified. For regulatory reasons as ships may fail classification society rules and delay ship certification. For commercial reasons due to inreased fabrication costs, longer build time, and higher lifetime maintenance costs. Finally, there could be reduced competitiveness of the vessel, risking project profitability and reputation.

Potential cutting to width of <=2050mm

Widths in excess of 2050mm will not be imported and cut to widths that will compete with widths that are produced in the UK – ie maximum 1500mm. With such a wide variety of end uses specifically for wide plate, and production machinery set up specifically to process these sizes, which attracts a premium price, it would not serve any purpose financially nor commercially to cut widths in excess of 2050mm into widths to compete with the UK Manufacturer.

Cutting wide reversing mill plate (>2050 mm) into narrower widths is generally not commercially sensible due to economic, technical, and quality-related drawbacks, which make it less competitive compared to producing plates closer to final width directly in the mill.

One of the key reasons why cutting wide reversing mill plate into narrower widths is high material yield loss would result when cutting to width. This produces significant waste on each cut due to kerf width and required edge trimming to achieve the acceptable quality. For example, cutting a 2500 mm plate into two 1200 mm widths often wastes 50–100 mm of steel per cut (1–3% yield loss), which is costly at scale.

Technical Limitations of Cutting Thick, Wide Plates

Cutting >40–50 mm thick plates is technically challenging; mechanical knives are limited, and thermal cutting introduces edge quality issues. Straightness and flatness problems also arise. Wide plate cutting often causes distortion or camber, requiring additional levelling. It also causes bevelled or rough edges. Plasma or oxy-fuel cut edges are rougher than mill-rolled edges, so are sometimes unsuitable for direct use (especially in welded structural applications).

Quality & Customer Requirements

Many customers require mill-edge plates (rolled edge) or specific edge geometries (square, bevelled, prepared for welding). Cut edges may not meet tolerance or surface quality standards, requiring extra edge milling or grinding—adding cost.

Metallurgical and Mechanical Property Concerns

Cutting to width introduces sheared edges, which may have micro-cracks, burrs, or strain hardening, reducing fatigue resistance or leading to crack initiation during service. The cutting process can induce additional residual stresses, potentially affecting flatness and dimensional stability of the final plate. Thermal cutting (oxy-fuel/plasma) can alter microstructure near edges, compromising mechanical properties and toughness

Surface Quality and Dimensional Tolerances

Poor Edge Straightness: Cut edges may not meet strict tolerances for straightness, squareness, or edge waviness required by many plate specifications. Rolling the correct width for the correct end use ensures consistent geometry and tolerance compliance, whereas cutting may lead to uneven width or taper along the plate. Mechanical stresses from cutting wide plates can cause distortion or bowing, making them unsuitable for flatness-critical applications.

Downstream Processing Issues

Welding Concerns: cut edges often require additional edge milling or machining to remove burrs or hardened layers before welding. This adds cost and processing time.

Coating and Forming Problems: Sharp or rough edges can compromise coating adhesion, paint quality, or formability in fabrication.

Scrap Generation: A 2050 mm plate cut to 1500 mm leaves ~550 mm of trim, which is often unusable for high-value applications, increasing yield loss.

Economic and Operational Drawbacks

Extra Processing Costs: Cutting to width adds an extra production step, requiring specialized equipment, handling, and edge conditioning, increasing cost and lead time.

Inefficient Material Utilization: The unusable offcut reduces rolling mill yield and overall production efficiency compared to rolling directly to 1500 mm.

Inventory Complexity: Producing non-standard widths and cutting later complicates stock management and order fulfilment.

Preferred Approach: Utilise the target width on the plate to maintain edge quality, mechanical properties, dimensional tolerances, certification integrity, and yield efficiency.

Conclusion

Cutting Quarto plate >2050mm to narrower widths to compete with UK produced Quarto plate of maximum 1500 mm is not justified because:

It adds processing costs and material waste.
It produces lower-quality edges compared to mill edge.
Competes poorly with mill rolled narrower widths.

Non substitutability of quarto plate of a thickness between 4.75mm and 15mm

It is not possible to substitute quarto plate with a thickness of between 4.75mm up to 15mm with plate with a thickness of in excess of 15mm.

Change in Circumstances since the original measures.

When the transition review TF0006 was undertaken in 2021, the TRA or TRID's own investigation led them to recommend that category M or 7 should not be considered under the safeguarding review as there was no likelihood of serious injury to domestic producers. Subsequently, this recommendation was overruled, for reasons that are not clear to us and category M or 7 was introduced under safeguarding.

At that time, there were two producers, Spartan UK and Liberty Steel.

Spartan UK do not produce material which is over 2050mm in width nor below 15mm.

Liberty Steel have the capacity to produce maximum widths of 3750mm in thicknesses of 25mm up to 110mm and 3500mm width for 12 to 20mm thicknesses but they have not made a commercial offer to the market since May 2024 so they are not a viable nor reliable source of UK manufactured Quarto Plate in the UK nor will they be in the future.

Until new safeguarding restrictions were put in place on 1st July 2025 Importers had been able to import sufficient quantities of quarto plate which are in excess of 2050mm wide and below 15mm in thickness which are not produced in the UK.

The main change in circumstances is that TRQs have now been reduced to permit import of only 20% of the residual TRQ per country and this will affect security of supply to industries reliant on these widths and thicknesses. Our government's strategy to increase defense, produce low carbon energy and for growth in the industry will result in an increase in demand for wide quarto plate in the future. A reduction in TRQs, consistent and increase in demand and complete inability to source these materials in the UK constitute a change in circumstances.

Downstream manufacturers simply cannot buy Quarto Plate below 15mm in thickness nor >2050mm from UK sources. They have to import these sizes and risk paying 25% duty on the goods which will result in a rise in costs of production.

Spartan UK is a company wholly owned by Metinvest in the Ukraine. Until the Russian invasion of Ukraine, significant quantities of plate were imported by Spartan UK from the Ukraine, including the sizes we are now requesting be discontinued from safeguarding. Since the invasion, these imports have been displaced by imports from the EU, under a significantly large TRQ.

We cannot see that is right or fair to protect a UK producer, who does not produce the sizes we request to be reviewed, by restricting imports particularly under the residual TRQs. The UK Producer themselves is importing these sizes from their affiliated companies in the EU. Surely this presents a monopolistic situation.

Import patterns show stable or demand driven volumes, not surges which reflect supply chain necessity – not market distortion. As the below figures demonstrate, there has been a steady flow of imports of both within the TRQs.

(table redacted from public version due to use of third party data)

In the absence of domestic supply of these goods, combined with consistent industrial demand, continued safeguarding only harms downstream UK manufacturers without benefitting domestic producers.

TRQs limit access to critical materials which drives up costs of UK manufacturers which in turn encourages offshoring of production – exactly the opposite of UK industrial Strategy.

Reviewing TRQs on these commodity codes would increase competitiveness and resilience for UK manufacturers in multiple sectors – as mentioned above.

The TRA's own principles support targeted removal.

In accordance with previous discussions and publications, safeguarding should only apply where:
There is a like product domestically produced – which there is not.
There is actual or potential injury – which there is not.
Safeguarding is in the economic interest of the UK – which is it not.
There is only harm, not benefit to UK industrial users.

Final Conclusion

Downstream steel manufacturers specify the width of plate required >2050mm to produce the products and heavy machinery we have specified above because those widths are fit for purpose. For structural, safety, financial, aesthetic reasons, demonstrated above, narrower widths cannot be substituted for >2050mm.

For guidance, the cost of profiling a plate – cutting to size – is £100/mt. Depending on the application, plate weights can reach up to 16 MT.

Widths >2050mm are not cut to size for quality and financial reasons. Wide plate brings a premium on the price so with that premium plus the profiling costs, it is not feasible.

Also, as previous demonstrated, Mill edge is required, cutting to size compromises the edge quality and thus end use.

Quarto Plate below 15mm and wider than 2050mm in width is not produced in the UK and has to be imported.

For further guidance, sizes of quarto plate which are imported in to the UK for the end uses we have mentioned above range from 2.1m to 4.3m widths in lengths of up to 12.5m.

Formal Request

The International Steel Trade respectfully requests that the Trade Remedies Authority (TRA) initiate a review of TRQs under safeguarding measures applicable to imports of

Non-alloy and other alloy quarto plates covered by product category 7 imported under commodity codes 7208 5191, 7208 5291, 7208 5198, 7208 5120, 7208 5299

These products are not produced in the UK. They serve critical, non substitutable functions in downstream UK Industries. They do not cause injury to UK steel manufacturers and are currently constrained by TRQs, limiting industrial competitiveness

The present request is made pursuant to regulation 35B of the Trade Remedies

(Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (the 'safeguards regulations') in view of an ongoing and lasting change of circumstances.