

Subject : Statement of Essential Facts related to anti-dumping investigation for heavy plates imported from South Korea (AD0071)

On behalf of Liberty Steel Group, we would like to highlight very significant risks associated with the published Statement of Essential Facts by TRA on 23 April 2026.

Before going into the details of the Essential Facts, we would like to clarify that Liberty strongly supports the investigation. REDACTED DUE TO COMMERCIAL SENSITIVITY

It was also agreed at the time that we would share relevant information on our range and capabilities which did in fact take place in November 2025. It therefore came as a huge surprise when we were informed by third parties REDACTED DUE TO COMMERCIAL SENSITIVITY that it had been decided to split the case into plates up to 2100mm and those over despite the harmful imports covering both of those ranges.

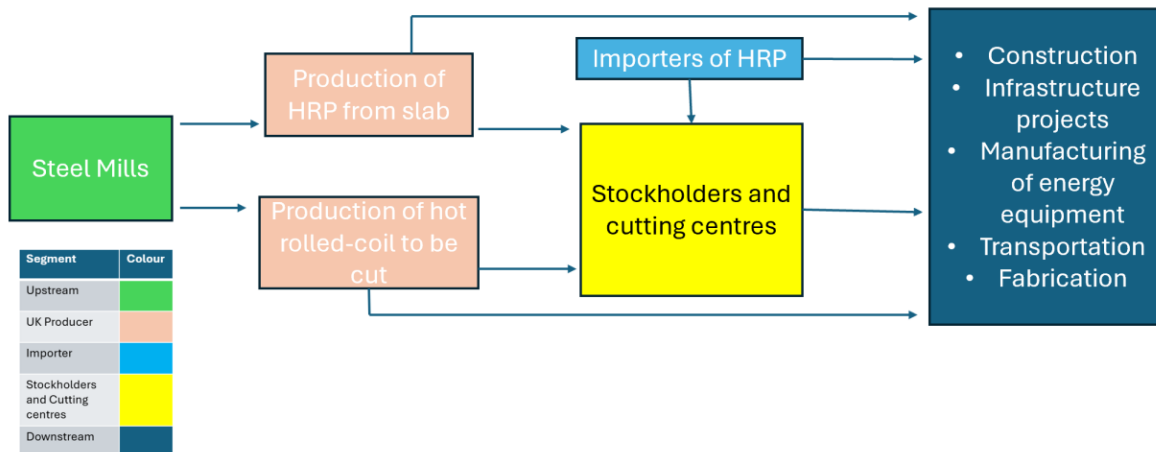
In January 2026, Liberty made several representations to the TRA which were accepted and agreed that that we had produced plates over 2500mm wide in the period of interest and indeed up to 3950mm wide.

We understood from those discussions that the proposed split of the tariff code was closed and the ruling would be based on the entire scope of the imports and indeed the range available from the 2 UK producers.

We also stated that majority of the heavy plates are cut to various sizes and amending the scope of the investigation not to include plates above 2,100 mm will simply nullify the effectiveness of the case. This fact was also communicated to TRA several times during discussions.

This basic fact is also referenced in the report in *Figure 1* as clearly stating that majority of the route to market is through stockholders and cutting centers.

Figure 1. An overview of the UK Hot Rolled Plate supply chain with examples of downstream



We also iterated that there is vast amount of potential supply of wide plates, mainly from Europe in addition to domestic production.

The Essential Facts report also clearly shows the damage to the industry in Table 19, where capacity utilization ratio is shown to be down by 22% during the period of investigation.

The main reason behind this drop is that market price level was started to be referenced to dumped prices for commodity grade heavy plates coming from South Korea and domestic producers could not keep up with sales prices below their variable costs. Regrettably this resulted in idling of production capacity. This fact is also very well evidenced in Table 11 and Table 12 of the Essential Facts report.

We strongly believe that the anti-dumping duty should be applied to all plates regardless of the width since:

- As demand can be easily switched to larger widths, excluding larger widths from the case will simply nullify the whole case
- There can never be a shortage of wide plates as producers in the UK and Europe and elsewhere in the world are capable of producing wider plates; not only South Korea or Indonesia

Consequently, restricting the investigation's scope by dimension is irrelevant; it does not address the core issue of input cost arbitrage. Instead, it creates a sanctuary for unfair trade. This regulatory gap will not protect the domestic industry but will instead incentivise exporters to exploit these "excluded" dimensions to maintain their unfair advantage.

Furthermore, TRA's preferred option to limit anti-dumping duties to plates under 2,500 mm also fails to account for the severe competitive disparity regarding raw material sourcing. While UK manufacturers are strictly prohibited from utilizing Russian-origin slabs due to current sanctions and trade restrictions, overseas exporters – including South Korea, which imported more than 50,000 tons of slabs on average per year from

Russian Federation according to UN Comtrade database during the investigation period - face no such limitations in their respective jurisdictions.

By maintaining a narrow scope based on width, TRA effectively leaves a back door open for exporters to leverage this access to cheap, restricted-origin slabs. This disparity provides exporters with both the ammunition and the motivation to flood the UK market with plates above 2,500 mm, produced from low-cost inputs that are legally inaccessible to domestic producers.

We would also like to bring another important development to your attention. During the long period for investigation (please note Liberty informed TRA about the dumping by South Korean companies in July 2024 through UK Steel and attempted to initiate the process), there were also changes in the market, as one of the companies found to be dumping heavy plates to the UK market merely switched production to their sister facility in Indonesia for UK exports – where they can evade the risk of anti-dumping..

We are at your disposal for any further clarification.