



# Registration form for interested parties and contributors

Case No.: AD0071

Dumping investigation

Hot-rolled steel plate originating in The Republic of Korea

Completed on behalf of (provide the name of your business or organisation):	<b>Spartan UK Limited</b> (hereunder – “Spartan UK” or “Applicant”)
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**Note:**

Please provide **two copies of your response to this form**: a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

When you have completed each form, indicate the **confidentiality** status of the document by placing an  in the relevant box below and in the header of the form. We strongly recommend this questionnaire be completed on a computer, so this step is easy to complete.

- Confidential
- Non-confidential (will be made available on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>)

Deadline for response:	23 June 2025
Case team contact:	AD0071@traderemedies.gov.uk



## Introduction

### Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation by **completing the relevant sections** as indicated in this form **and submitting the completed form** using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

An interested party is either:

- a government of the foreign country or territory subject to the investigation;
- an overseas exporter, an overseas producer or an importer of the goods subject to the investigation;
- a UK producer of goods that are like the goods subject to the investigation; or
- a trade or business association representing one or more of the above parties.

A contributor is a person or organisation who is not an interested party but who wants to register so that they can participate in an investigation.

### Scope of the investigation

Goods concerned	<p>Hot-rolled steel plate originating in The Republic of Korea described as:</p> <ul style="list-style-type: none"> <li>• Flat-rolled products of iron or non-alloy steel, of a width of 600mm or more, hot-rolled, not clad, plated or coated, not in coils; not further worked than hot-rolled, of a thickness exceeding 4.75mm, excluding tool steel. Including perforated or not further worked than surface-treated or simply cut into shapes other than rectangular; and/or</li> <li>• Flat-rolled products of iron or non-alloy steel, of a width of 600mm or more, clad; and/or</li> <li>• Flat-rolled products of other alloy steel, of a width of 600mm or more, not further worked than hot-rolled, not in coils, of a thickness of 4.75 mm or more.</li> </ul> <p>These hot-rolled steel plate products are currently classifiable within the following commodity codes (CN codes):</p> <p>72085120, 72085191, 72085198, 72085210, 72085299, 72085291, 72089020, 72089080, 72109030, 72254040, 72254060.</p>
Period of investigation (POI)	1 April 2024 to 31 March 2025



For further details, please refer to the Notice of Initiation on the public file:  
<https://www.trade-remedies.service.gov.uk/public/cases/>.

## Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by 23 June 2025, 23:59 GMT using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures. Please see the [TRA's public guidance](#) for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

## Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation, or a UK producer of goods that are like the goods subject to the investigation, we will ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

If your business is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

Sampled overseas exporters will have an individual margin calculated for their business. If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your business may be deemed not to have cooperated in the investigation. The TRA may base its findings



for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your business than if it had cooperated.

If we decide to sample overseas exporters, and your business is not selected for this sample, you may submit a request to us to calculate individual margins for your business. We may accept your request providing that:

- you submit the required information on time; and
- the number of exporters subject to examination is not so large that complying with the request would be unduly burdensome and risk preventing the timely completion of the investigation



## Section A: About your business or organisation

### A1. Your business' or organisation's activities

1. To determine your business' or organisation's role for the purpose of this investigation, please select all the following options that are applicable to your business or organisation. Please refer to the POI defined on page 2.

- [A1.1] During the POI, we produced the goods concerned in The Republic of Korea  
**Note: Please complete sections A2 and B.**
- [A1.2] During the POI, we directly exported the goods concerned from The Republic of Korea to the UK.  
**Note: Please complete sections A3 and B.**
- [A1.3] During the POI, we indirectly exported the goods concerned from The Republic of Korea to the UK via a third party (located either in The Republic of Korea or a third country not subject to the investigation).  
**Note: Please complete sections A3 and B.**
- [A1.4] During the POI, we imported the goods concerned originating in The Republic of Korea to the UK.  
**Note: Please complete sections A4 and B.**
- [A1.5] During the POI, we produced goods that are like the goods concerned in the UK.  
**Note: Please complete sections A5 and B.**
- [A1.6] Other.  
**Note: Please complete section B.**

2. If you selected 'Other' [A1.6], please describe the activity/activities of your business or organisation and your business' or organisation's interest in this investigation in the field below.

### A2. Production and domestic sales of the goods concerned



Complete this section if you indicated under A1 that you are a producer of the goods concerned in The Republic of Korea.

3. Please refer to the description of the goods concerned on page 2. In the field below, describe the goods that you produce and that fall within the description, including the corresponding commodity code if relevant.

4. Please provide your business' total production volumes and production capacity for the goods concerned during the period POI in the table below.

Total production volume of the goods concerned (POI) [tonnes]	
Total production capacity of the goods concerned (POI) [tonnes]	

Consider providing these figures in ranges in your non-confidential version of this form.

5. Please give details of all associated parties involved with the business in the production and sales (export and/or domestic) of the goods concerned during the POI. Both natural persons (individuals) and legal persons (e.g., companies) are considered to be associated where they meet the definition of 'Related Persons' in [Regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Company/Person name	Location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

6. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your business during the POI in the table below.

Total domestic sales volume of the goods concerned (POI) [tonnes]	
Total domestic sales value of the goods concerned (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

7. In terms of costs, are there any inputs in your production process that fluctuate? If so, can you please explain the extent of fluctuations and drivers (eg. Commodity price fluctuations) and the materiality of the input for cost production.



Confidential

Non-confidential



### A3. Direct and indirect exports of the goods concerned

Complete this section if you indicated under A1 that you are an exporter of the goods concerned from The Republic of Korea.

8. If you are not the producer of the goods concerned that you export to the UK, please provide details of your suppliers of the goods concerned and indicate whether these are the producers of the goods concerned in the table below.

Company name	Company location (city, country)	Relationship	Producer (Y/N)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

9. Please provide the total of your direct and indirect export volumes and export values of the goods concerned to the UK during POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your business), which is located in The Republic of Korea or a third country, are to be considered indirect exports.

Total direct export volume (POI) [tonnes]	
Total indirect export volume (POI) [tonnes]	
Total direct export value (POI) [£]	
Total indirect export value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

10. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

11. Please provide details of the commodity code(s) under which you export the goods concerned to the UK in the box below.



## A4. UK imports of the goods concerned

Complete this section if you indicated under A1 that **you are an importer of the goods concerned from the Republic of Korea.**

12. Please provide the total of your import volumes and import values of the goods concerned originating in/exported from The Republic of Korea to the UK during the POI in the table below.

Total import volume (POI) [tonnes]	
Total import value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

13. Please provide details for your suppliers of the goods concerned originating in The Republic of Korea in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

14. Please specify the purpose of the goods concerned that you are importing from The Republic of Korea. Select **all** of the following options that are applicable to your business or organisation.

- We resell the goods unchanged to distributors or final customers.
- We process the goods before reselling them to distributors or final customers.
- We use the goods as input in our production of . (specify the product/s).
- Other.

15. If you selected 'Other', please specify the purpose of the goods concerned that you are importing from The Republic of Korea in the field below.



16. Please describe how the goods concerned compare to UK-produced like goods in the field below.

## **A5. Production and sales of goods produced in the UK that are like the goods concerned**

**Complete this section if you indicated under A1 that you are a producer in the United Kingdom of goods that are like the goods concerned.**

17. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned.

**Spartan UK produces steel plates with thickness from 8 to 150 mm, max width 2100 mm and max length 22 m. Metinvest (Holding company of Spartan) plate catalogue is available following the link:**

**[https://metinvestholding.com/Content/Entities/Report/14/en/metinvest\\_plates-2024.pdf](https://metinvestholding.com/Content/Entities/Report/14/en/metinvest_plates-2024.pdf)**

**Product page at Metinvest site:**

**<https://metinvestholding.com/en/products/plates>**

18. Please provide your business' total production volumes and production capacity for UK production of goods that are like the goods concerned during **the injury period (IP) which is 1 April 2021 to the 31 March 2024 and POI (1 April 2024 – 31 March 2025)** in the table below.



	Apr 2021/Mar 2022	Apr 2022/Mar 2023	Apr 2023/Mar 2024	POI
Total production volume [tonnes]	<b>100<sup>1</sup></b>	<b>89</b>	<b>87</b>	<b>67</b>
Total production capacity [tonnes]	<b>100</b>	<b>100</b>	<b>93</b>	<b>93</b>

Consider providing these figures in ranges in your non-confidential version of this form.

19. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods concerned produced by your business in the UK during the IP and the POI in the table below.

	2021/2022	2022/2023	2023/2024	2024/2025
Total domestic sales volume of the like goods [tonnes]	<b>100<sup>2</sup></b>	<b>71</b>	<b>83</b>	<b>71</b>
Total domestic sales value of the like goods [£]	<b>100</b>	<b>95</b>	<b>81</b>	<b>61</b>
Total export sales volume of the like goods [tonnes]	<b>100</b>	<b>128</b>	<b>95</b>	<b>48</b>
Total export sales value of the like goods [£]	<b>100</b>	<b>158</b>	<b>90</b>	<b>40</b>

Consider providing these figures in ranges in your non-confidential version of this form.

20. Please provide the total employee and wage figures for the IP and POI:

<sup>1</sup> This non-confidential version of the registration form does not contain absolute figures of production volumes and production capacity of the Applicant because this is commercially sensitive information which disclosure would give a significant advantage to competitors

<sup>2</sup> This non-confidential version of the registration form does not contain absolute figures of domestic and export sales volumes and sales values of the Applicant because this is commercially sensitive information which disclosure would give a significant advantage to competitors



	2021/2022	2022/2023	2023/2024	2024/2025
Total number of employees	100 <sup>3</sup>	101	100	105
Number of employees for all like goods	100	101	100	105
Hourly mean wage for full time employees engaged in activities related to the like goods (£)	100	100	115	103

21. In the field below, please provide any other comments or evidence related to injury you believe you company is suffering as a result of alleged dumped imports of the goods concerned into the UK from the Republic of Korea. This can relate to the prices, volumes and/or profits associated with your business, in the context of the goods concerned or goods that are like the goods concerned.

**Please note that Spartan UK’s detailed position as to injury was already provided in the Application form which was submitted to the TRA. However, for the sake of convenience, please see the additional data on injury also copied below.**

**Negative effect of Korean dumped imports on prices of Spartan UK Limited**

Dumping has allowed Korean imports to be sold at lower prices than UK production. In most time periods, prices of subject imports were below UK producers’ prices (and in some periods even below costs – notably in 2024), and undercut and undersold UK producers’ prices.

**Negative effect of dumped imports on prices of the Applicant<sup>4</sup>**

Indicators	2021	2022	2023	2024
Price of the Applicant on the internal market of the UK, GBP/ton	[redacted – commercially sensitive information]			

<sup>3</sup> This non-confidential version of the registration form does not contain absolute figures of number of employees and their wages of the Applicant because this is commercially sensitive information which disclosure would give a significant advantage to competitors

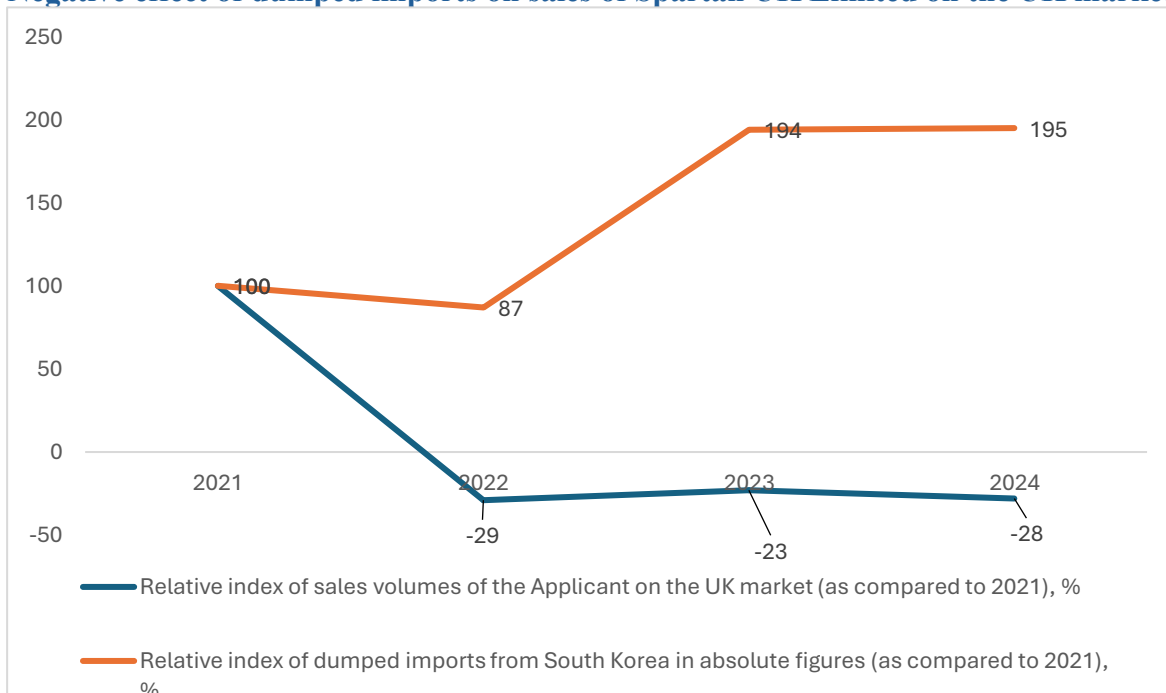
<sup>4</sup> This non-confidential version of the registration form does not contain absolute figures of prices and cost of production of the Applicant because this is commercially sensitive information which disclosure would give a significant advantage to competitors



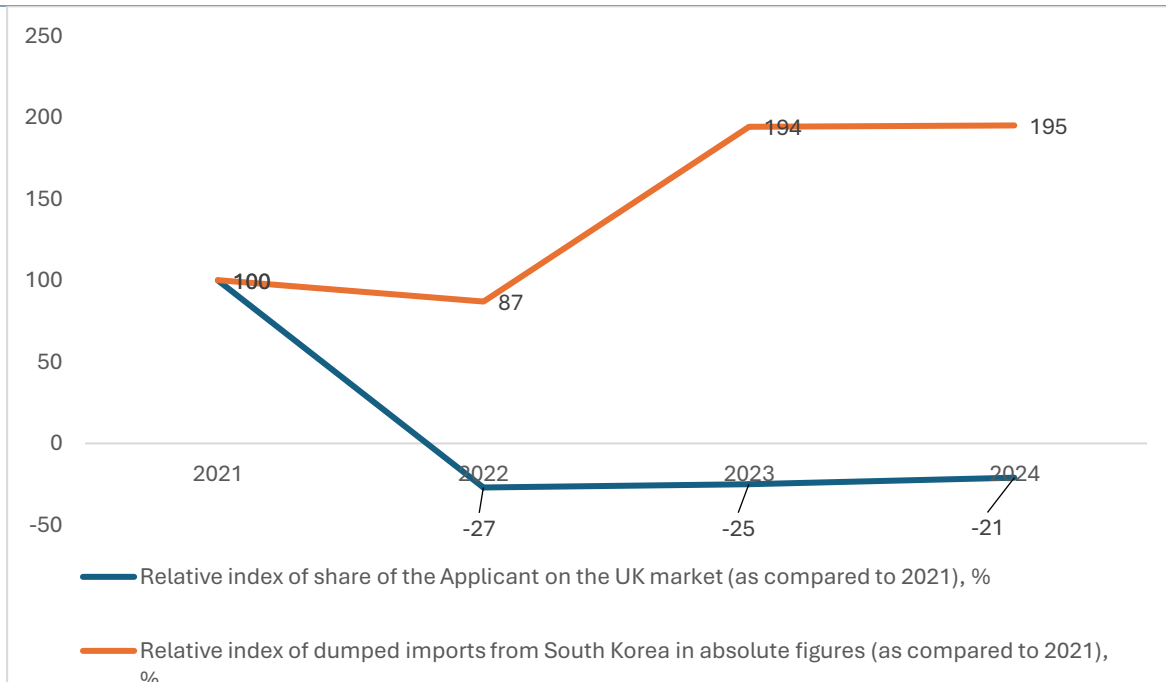
Relative index (as compared to 2021), %	100	47	14	-2
Cost of production of the Applicant, GBP/ton	[redacted – commercially sensitive information]			
Relative index (as compared to 2021), %	100	40	12	8
Import price of South Korea, GBP/ton	640	996	728	609
Relative index of dumped imports from South Korea in absolute figures, (as compared to 2021)%	100	87	194	195

Dumping from South Korea has negatively influenced the Applicant’s ability to sell the plates on the UK market. Therefore, the Applicant has lost considerable part of sales and its share on the UK market.

**Negative effect of dumped imports on sales of Spartan UK Limited on the UK market**



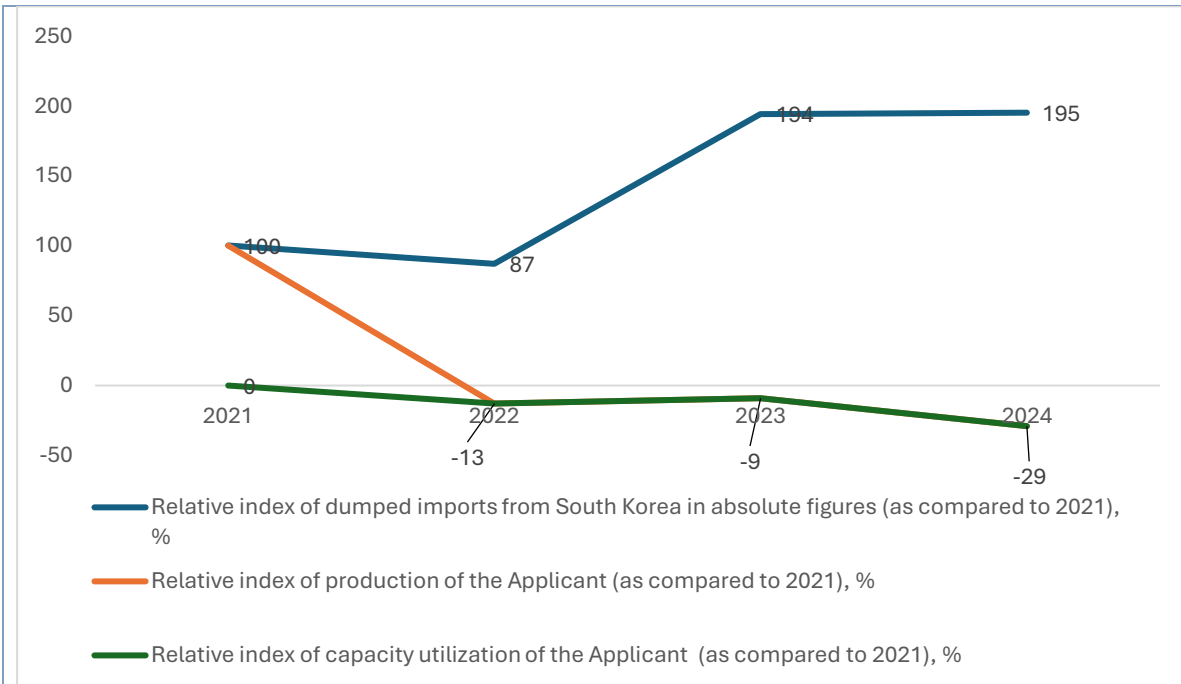
**Negative effect of dumped imports on share of Spartan UK Limited on the UK market**



Loss of sales on the UK market has resulted in considerable decrease of production and utilization of production capacities of Spartan UK Limited.

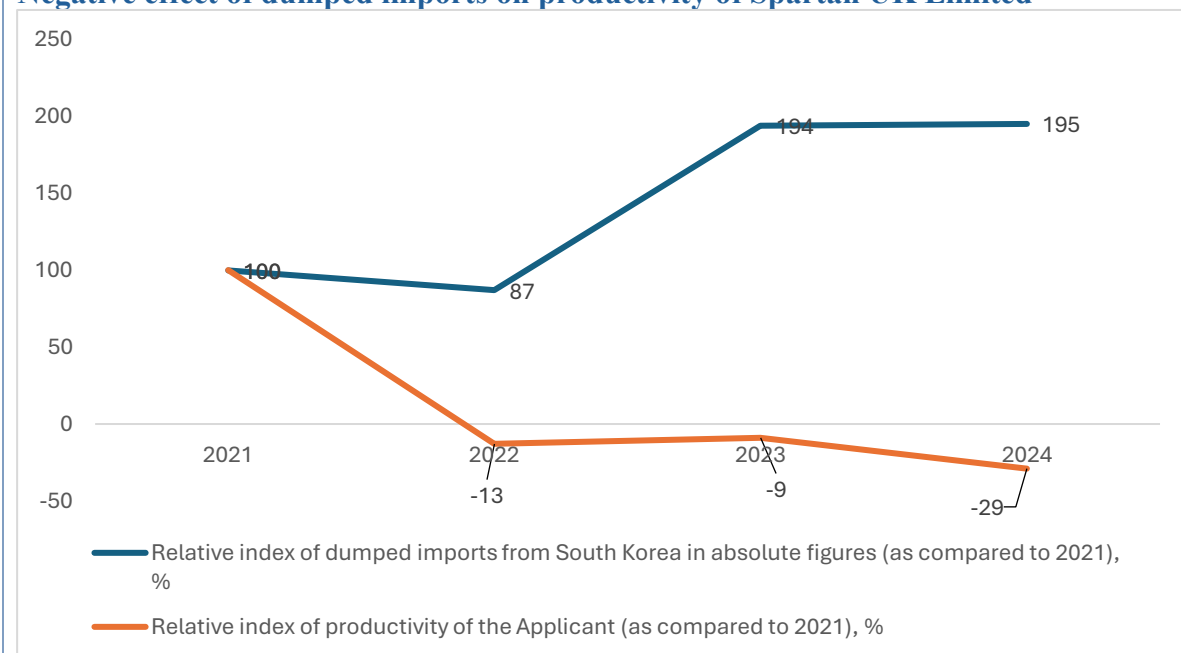
In 2024, Spartan UK Limited was forced to sharply reduce sales prices and underlying profits to limit market share deterioration in face of the low-priced imports from South Korea. The alternative was to lose additional order volumes and reduce production even more, with a high risk of complete production shutdown.

**Negative effect of dumped imports on production and utilization of production capacities of the Spartan UK Limited**



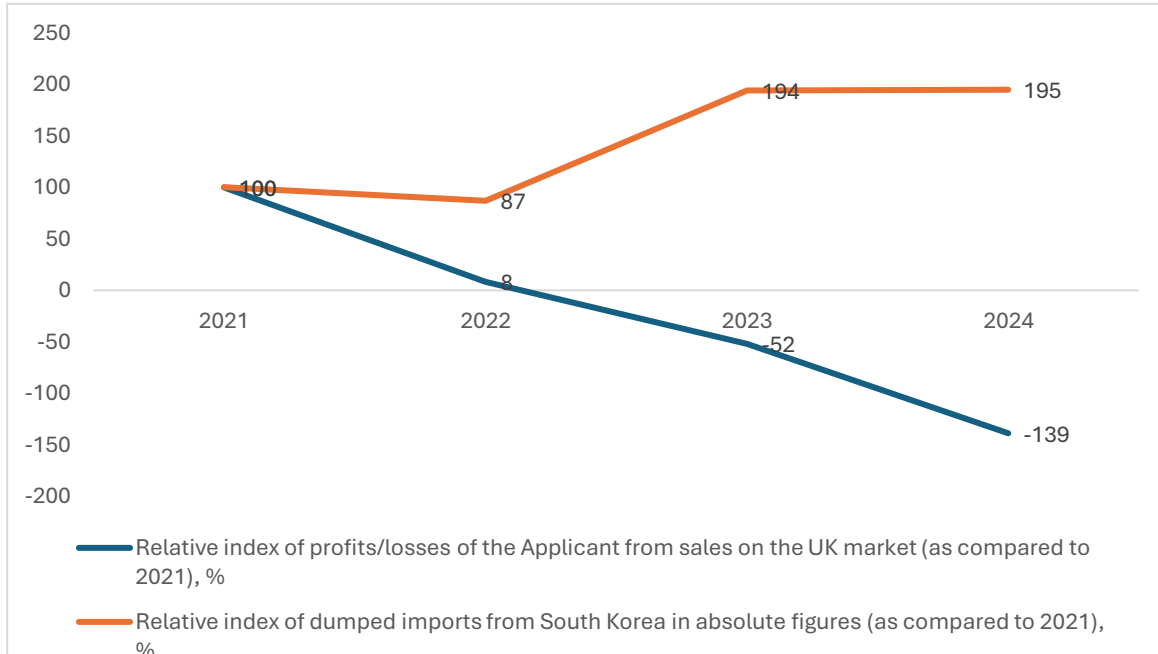
Dumping imports from South Korea have also negatively influenced other economic indicators of Spartan UK Limited.

### Negative effect of dumped imports on productivity of Spartan UK Limited

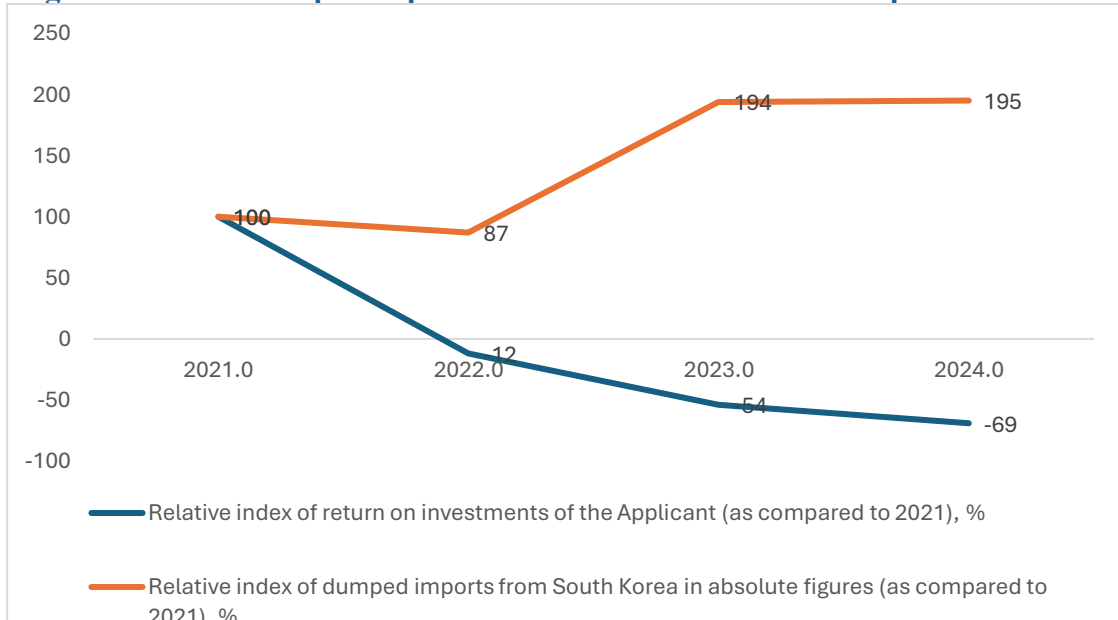




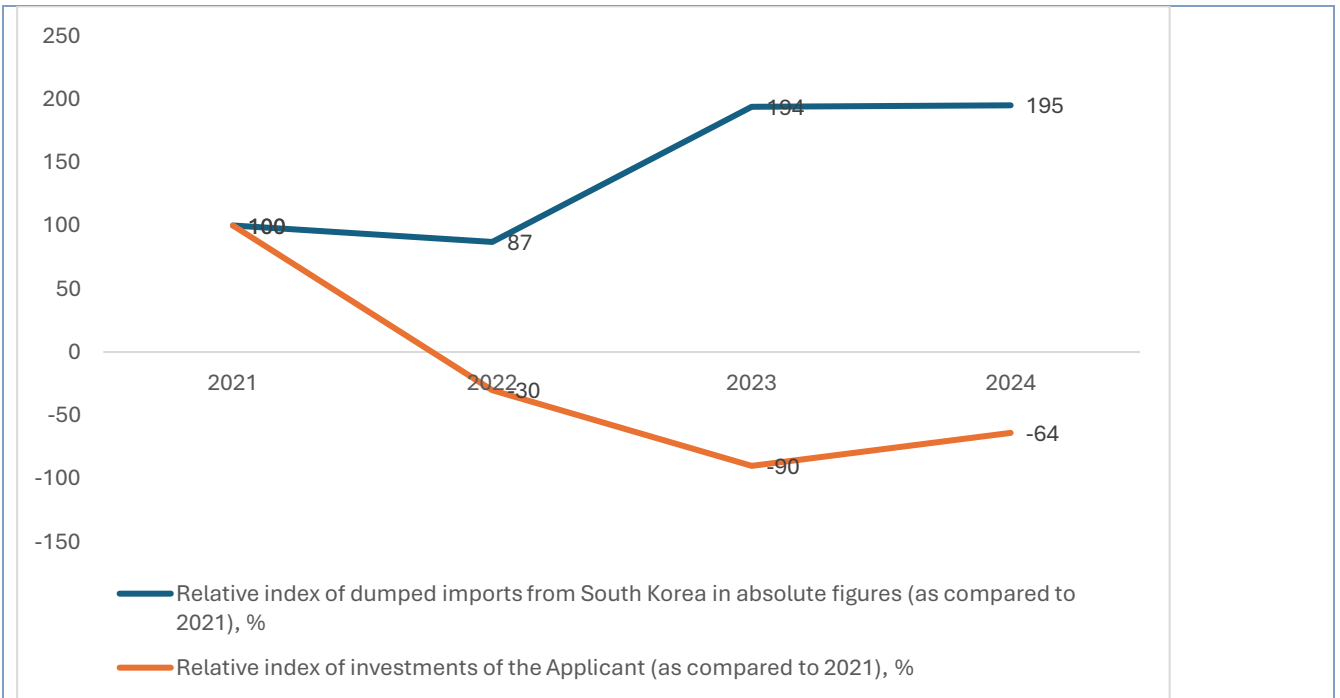
### Negative effect of dumped imports on profits/losses of the Spartan UK Limited from the sales on the UK market



### Negative effect of dumped imports on return on investments of Spartan UK Limited



### Negative effect of dumped imports on investments of Spartan UK Limited



In view of the above, it is evident that dumping imports from South Korea have already caused injury to the domestic industry



## Section B: Additional information

### B1. Other interested parties

22. If you believe there are other interested parties that should register an interest in this case, please provide their business' or organisation's name and website details below.

Name	Website
<b>LIBERTY STEEL DALZELL LTD</b>	<a href="https://libertysteelgroup.com/uk/contact/">https://libertysteelgroup.com/uk/contact/</a>
<b>Posco Steel Korea</b>	<a href="http://www.posco.co.kr">www.posco.co.kr</a>
<b>Huundai Steel Korea</b>	<a href="http://www.hyundai-steel.com">www.hyundai-steel.com</a>
<b>Stemcor London Trading Limited</b>	<a href="https://www.stemcor.com">https://www.stemcor.com</a>
<b>Duferco UK Ltd</b>	<a href="https://dith.com/dith/Duferco-UK.html">https://dith.com/dith/Duferco-UK.html</a>
<b>Salzgitter Mannesman UK</b>	<a href="https://www.salzgitter-mannesmann-uk.com">https://www.salzgitter-mannesmann-uk.com</a>
<b>OPR Group</b>	<a href="https://oprgroup.co.uk">https://oprgroup.co.uk</a>
<b>Brisko Metal Resources</b>	<a href="https://www.brisko.co.uk">https://www.brisko.co.uk</a>
<b>M Brittain Ltd</b>	<a href="https://www.mbrittain.co.uk">https://www.mbrittain.co.uk</a>
<b>Sebden Steel</b>	<a href="https://www.sebden.com">https://www.sebden.com</a>
<b>Clarkes of Stillington</b>	<a href="https://www.clarkesofstillington.com">https://www.clarkesofstillington.com</a>
<b>Billington Structures</b>	<a href="https://billington-structures.co.uk">https://billington-structures.co.uk</a>
<b>Group 1 Steel Ltd</b>	<a href="https://www.group1steel.co.uk">https://www.group1steel.co.uk</a>
<b>Genesis Steel Omagh</b>	<a href="https://genesissteel.co.uk">https://genesissteel.co.uk</a>

Add additional rows as required

### B2. Scope

23. We welcome commentary and feedback on the commodity codes provided in this form, and the overall scope of the investigation. If you consider that the scope of the investigation should be different, please provide your reasons in the field below including any relevant commodity codes that should be included or removed.



Spartan UK confirms that codes included in the overall scope of the investigation are correct.

### B3. Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types and subcategories of goods that fall under the description of the goods concerned. PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the UK and those produced in the country subject to an investigation.

We have created the following draft PCN table for this investigation:

Category	Subcategory	Code	Description
Prime/non-prime		P1	Prime - Material meets specifications.
		P2	Non-prime – Off-specification material, seconds, etc.
Manufacturing Process		M1	Rolled as individual plate (quarto mill plate, four-high mill plate, etc.).
		M2	Cut-to-length from steel coils ('cut-to-length plate').
Grade	<i>Structural steel (including offshore) (specifications EN 10025-2 through EN 10025-6, EN 10149-2 and EN 10149-3, EN 10225, EN 10343, ASTM, API, etc.).</i>	G11	S235 and below and comparable grades based on minimum yield strength (S185, ASTM A283, etc.).
		G12	S275 and comparable grades based on minimum yield strength (ASTM A36, A572-42, API 2H-42, etc.).
		G13	S355 and comparable grades based on minimum yield strength (ASTM A572-50, A588, A709-50, API 2H-50, API 2W-50, API 2Y-50, etc.).
		G14	S420 to S460 and comparable grades based on minimum yield strength (ASTM A572-60, A572-65, A1066-65, API 2W-60, API 2Y-60, etc.).
		G15	S500 to S690 and comparable grades based on minimum yield strength (ASTM A709-HPS70, A709-HPS100W, A514, etc.).
		G16	Above S690 and comparable grades based on minimum yield strength.
		G21	<i>Shipbuilding steel (specifications ABS, BV, DNV, GL, DNV-GL, KRS, LRS, RINA, RS, ASTM A131, etc.).</i>



Category	Subcategory	Code	Description	
		G22	Grades A27S, D27S, E27S and comparable grades based on minimum yield strength (NVA27S, D27S, E27S; etc.).	
		G23	Grades AH32, DH32, EH32, FH32 and comparable grades based on minimum yield strength (BV-AH32, DH32, EH32, FH32; NV-A32, D32, E32, F32; etc.).	
		G24	Grades AH36, DH36, EH36, FH36 and comparable grades based on minimum yield strength (BV-AH36, DH36, EH36, FH36; NV-A36, D36, E36, F36; etc.).	
		G25	Grades AH40, DH40, EH40, FH40 to AB-AQ43, DQ43, EQ43, FQ43 and comparable grades based on minimum yield strength (BV-AH40, DH40, EH40, FH40; NV-A40, D40, E40, F40; NV-A420, D420, E420; etc.).	
		G26	Grades AQ51, DQ51, EQ51, FQ51 and above and comparable grades based on minimum yield strength (AB-AQ63, DQ63, EQ63; AB-AQ70, DQ70, EQ70, FQ70; NV-A500, D500, E500, F500; NV-A690, D690, E690, F690; etc.).	
		G31	Non-alloy steel	
		<i>Pressure vessel steel (specifications EN 10028-2 through EN 10028-6, EN10120, EN 10207, ASTM(ASME) (S)A203, (S)A387, (S)A516, (S)A537, (S)A517, (S)A553, etc.).</i>	G32	Alloy steel
			<i>Steels for case-hardening, quenching &amp; tempering (specifications EN 10083-2, EN 10083-3, EN 10084, ASTM A829, ASTM A830, etc.).</i>	G41
		<i>Pipeline steel (specifications EN 10208-1, EN 10208-2, API Spec 5L, ISO 3183, DNV-OS-F101, etc.).</i>		G42
			<i>Abrasion-resistant steel (heavy plate having a hardness of <math>\geq 300</math> Brinell).</i>	G51
		<i>Other steel (heavy plate not falling within one of the steel groups defined above).</i>		G61
				G71
				G72
<b>Width</b>			W1	Less than 1500 mm
		W2	1500 mm or more but not exceeding 2100 mm	
		W3	2100 mm or more but not exceeding 3050 mm	
		W4	3050 mm or more but not exceeding 3500 mm	
		W5	more than 3500 mm	
<b>Thickness</b>		T1	4.75 mm to $\leq 8$ mm	
		T2	$> 8$ mm to $\leq 10$ mm	
		T3	$> 10$ mm to $\leq 80$ mm	
		T4	$> 80$ mm to $\leq 150$ mm	



Category	Subcategory	Code	Description
		T5	> 150 mm to ≤ 250 mm
		T6	> 250 mm
Supply condition		N1	Normalised
		N2	Not normalised
Surface condition	<i>For Manufacturing Process Code M1 (individual rolled plate)</i>	C11	Not descaled.
		C12	Descaled (e.g., shot blasted) but not subsequently coated (e.g., by primer coating).
		C13	Descaled and subsequently coated (e.g., by primer coating).
	<i>For Manufacturing Process Code M2 (cut-to-length plate)</i>	C21	Untreated.
		C22	Pickled and not subsequently surface protected (e.g., oiled).
		C23	Pickled and subsequently surface protected (e.g., oiled).

24. Please review the above draft PCN structure for this investigation and provide any comments in the field below (eg. Fields that should be included or removed).

**Firstly**, we stress that the initial PCN coding system suggested in the Application form, i.e. referring to the Steel strength and thickness, is the most appropriate for this case. As was explained in the Application form, the given criteria have direct price and cost of production implications. Those two criteria effect the production cost and end use of the plates. Moreover, it is convenient for the interested parties to complete questionnaires using such coding.

**Secondly**, alternatively, in case the TRA believes that more detailed classification shall be applicable, we suggest removing steel grades as criterion and focusing on key properties of the material, that is steel strength class and steel quality.

Differentiation based on the steel grades relies heavily on the EN standard references and provides space for interpretation in terms of equivalent international standards. Many or the grades in the list share the same core properties such as yield strength, tensile strength, elongation and impact energy at different temperatures. These properties are fundamental to determining the cost of production and the value in use of material, even if areas of application can differ, e.g. construction elements of buildings and infrastructure, ship hulls, containers for liquids, elements of machinery.

To provide an understanding of similarities between steel grades produced to different standards, we can refer to different standards listed in the proposed table.

**G13:** S355 and comparable grades based on minimum yield strength (ASTM A572-50, A588, A709-50, API 2H-50, API 2W-50, API 2Y-50, etc.).

Standard: EN 10029 – 2



Table 6 — Mechanical properties – Tensile test properties at room temperature for steel grades S235 to S500

Designation		Minimum yield strength $R_{eH}$ <sup>a</sup> MPa Nominal thickness mm									Tensile strength $R_m$ <sup>a</sup> MPa Nominal thickness mm				
Steel name	Steel number	≤ 16	> 16 ≤ 40	> 40 ≤ 63	> 63 ≤ 80	> 80 ≤ 100	> 100 ≤ 150	> 150 ≤ 200	> 200 ≤ 250	> 250 ≤ 400	< 3	≥ 3 ≤ 100	> 100 ≤ 150	> 150 ≤ 250	> 250 ≤ 400
S235JR	1.0038	235	225	215	215	215	195	185	175	165	360 to 510	360 to 510	350 to 500	340 to 490	330 to 480
S235J0	1.0114														
S235J2	1.0117														
S275JR	1.0044	275	265	255	245	235	225	215	205	195	430 to 580	410 to 560	400 to 540	380 to 540	380 to 540
S275J0	1.0143														
S275J2	1.0145														
S355JR	1.0045	355	345	335	325	315	295	285	275	265	510 to 680	470 to 630	450 to 600	450 to 600	450 to 600
S355J0	1.0553														
S355J2	1.0577														
S355K2	1.0596														

**G24:** Grades AH36, DH36, EH36, FH36 and comparable grades based on minimum yield strength (BV-AH36, DH36, EH36, FH36; NV-A36, D36, E36, F36; etc.).  
Standard: ASTM A131/A131M

**A131/A131M** – 14

TABLE 6 Tensile Requirements for Ordinary-Strength and Higher-Strength Structural Steel

Grade	Tensile Strength, ksi [MPa]	Yield Point, min, ksi [MPa]	Elongation in 8 in. [200 mm] <sup>A,B</sup> , min, %	Elongation in 2 in. [50 mm] <sup>B,C</sup> , min %
Ordinary strength: A, B, D, E	58 to 75 [400 to 520] <sup>D</sup>	34 [235]	21	24
Higher strength: AH32, DH32, EH32, FH32	64 to 85 [440 to 590]	46 [315]	19	22
AH36, DH36, EH36, FH36	71 to 90 [490 to 620]	51 [355]	19	22
AH40, DH40, EH40, FH40	74 to 94 [510 to 650]	57 [390]	19	22

<sup>A</sup> For nominal thickness or diameter under 5/16 in. [8 mm], a deduction from the specified percentage of elongation in 8 in. [200 mm] shall be made. See elongation requirement adjustments under the Tension Tests section of Specification A6/A6M for deduction values.

<sup>B</sup> Elongation is not required for floor plate.

<sup>C</sup> For nominal thickness or diameter over 3.5 in. [90 mm], a deduction from the specified percentage of elongation in 2 in. [50 mm] shall be made. See elongation requirement adjustments under the Tension Tests section of Specification A6/A6M for deduction values.

<sup>D</sup> For Grade A shapes and bars, the upper limit of tensile strength may be 80 ksi [550 MPa].

**G31:** Non-alloyed pressure vessels steels  
Standard: EN 10028-2



EN 10028-2:2017 (E)

Steel grade		Usual delivery condition <small>a b</small>	Nominal thickness <i>t</i>  mm	Tensile properties at room temperature			Impact energy $KV_2$ <i>J</i> min. at a temperature in °C of		
Steel name	Steel number			Yield strength $R_{eH}$ MPa min	Tensile strength $R_m$ MPa	Elongation after fracture <i>A</i> % min.	-20 <sup>f</sup>	0 <sup>f</sup>	+20
P355GH	1.0473	+N <sup>c</sup>	≤ 16	355	510 to 650	20	27	34	40
			16 < <i>t</i> ≤ 40	345					
			40 < <i>t</i> ≤ 60	335	490 to 630				
			60 < <i>t</i> ≤ 100	315					
			100 < <i>t</i> ≤ 150	295	480 to 630				
			150 < <i>t</i> ≤ 250	280					

Based on the strong similarities of the mechanical properties between different steel grades, we consider it more appropriate to group the steel quality by the fundamental parameter of yield strength, rather than different standards.

Two key cost drivers to achieve the required yield strength level are the chemical composition of steel and the rolling process (time to roll, pressure during rolling, necessity to control temperature of rolling etc.). Most steel grades in the proposed table are comparable from the production point of view and should be considered in aggregated manner based on their characteristics rather than nominal designation.

On the contrary, we suggest using the criteria of steel strength class and steel quality. In terms of steel strength class, the use of the initially proposed dimension of PCN is the most appropriate:

Characteristic	Description	PCN value
Steel strength class Minimum yield strength on thickness ≤16mm in Mpa	01 – 235 Mpa	S01
	02 – 275 Mpa	S02
	03 – 355 Mpa	S03
	04 – 420 Mpa	S04
	05 – 460 Mpa	S05

As to the introduction of steel quality (steel chemical composition), we propose to use the following criteria, defined in the standard EN 10020: Non-alloyed steels are steel grades in which none of the limit values in Table 1 is reached by the contents.



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**Table 1 – Boundary between non alloy and alloy steels  
(ladle analysis)**

Specified element		Limit value % by mass
Al	Aluminium	0,30
B	Boron	0,0008
Bi	Bismuth	0,10
Co	Cobalt	0,30
Cr	Chromium	0,30
Cu	Copper	0,40
La	Lanthanides (each)	0,10
Mn	Manganese	1,65 <sup>a)</sup>
Mo	Molybdenum	0,08
Nb	Niobium	0,06
Ni	Nickel	0,30
Pb	Lead	0,40
Se	Selenium	0,10
Si	Silicon	0,60
Te	Tellurium	0,10
Ti	Titanium	0,05
V	Vanadium	0,10
W	Tungsten	0,30
Zr	Zirconium	0,05
Others (except carbon, phosphorus, sulphur, nitrogen) (each)		0,10

a) Where manganese is specified only as a maximum the limit value is 1,80 % and the 70 % rule (see 3.1.2) does not apply.

The wording of the parameter could consequently be as follows

Steel quality (steel chemical composition)	Non-alloyed steels	<p>A01 – steels with the content of elements according to certified chemical composition (ladle analysis) below the following thresholds:</p> <ul style="list-style-type: none"> <li>• Aluminium (Al): 0.3%</li> <li>• Boron (B): 0.0008%</li> <li>• Bismuth (Bi): 0,1%</li> <li>• Cobalt (Co): 0.3%</li> <li>• Chromium (Cr): 0.3%</li> <li>• Copper (Cu): 0.4%</li> <li>• Lanthanides (La): 0.1%</li> <li>• Manganese (Mn): 1.65%</li> <li>• Molybdenum (Mo): 0.08%</li> <li>• Niobium (Nb): 0.06%</li> </ul>
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		<ul style="list-style-type: none"> <li>• Nickel (Ni): 0.3%</li> <li>• Lead (Pb): 0.4%</li> <li>• Selenium (Se): 0.1%</li> <li>• Silicon (Si): 0.6%</li> <li>• Tellurium (Te): 0.1%</li> <li>• Titanium (Ti): 0.05%</li> <li>• Vanadium (V): 0.1%</li> <li>• Tungsten (W): 0.3%</li> <li>• Zirconium (Zr): 0.05%</li> </ul>
	Alloyed steels	A02 – all other steels

**Thirdly**, we also suggest modifying the supply condition criteria. While the current PCN system introduces only two dimensions (normalised and not normalised), there are two distinct processes of steel normalisation, one directly during rolling by temperature control and the other one outside of the rolling line in a normalising furnace. They have significantly different costs of process.

Respectively, we would suggest extending the criterion as follows:

- N1 – normalised during rolling,
- N2 – normalised in furnace
- N3 – not normalised.

As to the other criteria, suggested in this Registration form, they can be used for the classification (prime/non-prime category, manufacturing process, width, thickness, surface condition). However, we would like to stress again that they are less important for the proper analysis of the product and they can overcomplicate the investigation.

**Fourthly**, please see our suggestion as to the PCN table below.

Category	Subcategory	Code	Description
<b>Prime/non-prime</b>		P1	Prime - Material meets specifications.
		P2	Non-prime – Off-specification material, seconds, etc.
<b>Manufacturing Process</b>		M1	Rolled as individual plate (quarto mill plate, four-high mill plate, etc.).
		M2	Cut-to-length from steel coils ('cut-to-length plate').
<b>Steel strength class</b>		S01	235 Mpa ( <i>Minimum yield strength on thickness &lt;=16mm in Mpa</i> )
		S02	275 Mpa ( <i>Minimum yield strength on thickness &lt;=16mm in Mpa</i> )
		S03	355 Mpa ( <i>Minimum yield strength on thickness &lt;=16mm in Mpa</i> )
		S04	420 Mpa ( <i>Minimum yield strength on thickness &lt;=16mm in Mpa</i> )
		S05	460 Mpa ( <i>Minimum yield strength on thickness &lt;=16mm in Mpa</i> )



<b>Steel quality</b>	A01	Non-alloyed steels – steels with the content of elements according to certified chemical composition (ladle analysis) below the following thresholds:	
		<ul style="list-style-type: none"> <li>• Aluminium (Al): 0.3%</li> <li>• Boron (B): 0.0008%</li> <li>• Bismuth (Bi): 0,1%</li> <li>• Cobalt (Co): 0.3%</li> <li>• Chromium (Cr): 0.3%</li> <li>• Copper (Cu): 0.4%</li> <li>• Lanthanides (La): 0.1%</li> <li>• Manganese (Mn): 1.65%</li> <li>• Molybdenum (Mo): 0.08%</li> <li>• Niobium (Nb): 0.06%</li> <li>• Nickel (Ni): 0.3%</li> <li>• Lead (Pb): 0.4%</li> <li>• Selenium (Se): 0.1%</li> <li>• Silicon (Si): 0.6%</li> <li>• Tellurium (Te): 0.1%</li> <li>• Titanium (Ti): 0.05%</li> <li>• Vanadium (V): 0.1%</li> <li>• Tungsten (W): 0.3%</li> <li>• Zirconium (Zr): 0.05%</li> </ul>	
	A02	Alloyed steels - all other steels	
<b>Width</b>	W1	Less than 1500 mm	
	W2	1500 mm or more but not exceeding 2100 mm	
	W3	2100 mm or more but not exceeding 3050 mm	
	W4	3050 mm or more but not exceeding 3500 mm	
	W5	more than 3500 mm	
<b>Thickness</b>	T1	4.75 mm to $\leq$ 8 mm	
	T2	$>$ 8 mm to $\leq$ 10 mm	
	T3	$>$ 10 mm to $\leq$ 80 mm	
	T4	$>$ 80 mm to $\leq$ 150 mm	
	T5	$>$ 150 mm to $\leq$ 250 mm	
	T6	$>$ 250 mm	
<b>Supply condition</b>	N1	Normalised during rolling	
	N2	Normalised in furnace	
	N3	Not normalised	
<b>Surface condition</b>	<i>For Manufacturing Process Code M1 (individual rolled plate)</i>	C11	Not descaled.
		C12	Descaled (e.g., shot blasted) but not subsequently coated (e.g., by primer coating).
		C13	Descaled and subsequently coated (e.g., by primer coating).
		C21	Untreated.



<i>For Manufacturing Process Code M2 (cut-to-length plate)</i>	C22	Pickled and not subsequently surface protected (e.g., oiled).
	C23	Pickled and subsequently surface protected (e.g., oiled).

## B4. Economic Interest Test

25. If, following an investigation or review, we conclude that a measure should be imposed, we conduct an Economic Interest Test (EIT) to determine whether the measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of UK upstream companies (providing inputs for the manufacture of the goods that are like the goods concerned) and UK customers (downstream companies buying the goods)? Please confirm in the final column if we are able to contact these companies.

Company name <sup>5</sup>	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers Y

<sup>5</sup> This non-confidential version of the registration form does not contain names and addresses of all Applicant's UK customers because this is commercially sensitive information which disclosure would give a significant advantage to competitors. Moreover, the Applicant does not have a permission for disclosing personal data of employees of the Applicant's UK customers













[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – contains personal information]	UK customers	Y

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

### B5. Other comments

26. Please use the field below to provide additional information that you consider relevant to this investigation.

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).