



International Steel Trade Association

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To Whom it may concern.

Ref AD0071

We would like to submit further information as below:

Tariff Heading numbers 72085191 and 72085291 should be removed from this investigation for the following reasons.

There is No Domestic Production:

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.

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 and there is no current or planned production capacity for widths in excess of 2050mm.

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;

Manufacture of heavy vehicles

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

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. 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 and cost efficiency.

Furthermore, widths in excess of 2050mm will not be imported and slit to widths that will compete with Domestic production. 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 slit these widths into sizes to compete with the UK Manufacturer.

Yours faithfully

Simone Draper