



Seoul Office:

11F, POSCO Center West Wing, 440, Teheran-ro,

Gangnam-gu, Seoul, Korea

Tel : +82 2-3457-4191

Fax : 82 2-3457-4167~9

Head Office:

470, Jang Heung Dong, Pohang City,

Kyungsang Buk Do, Korea. 790-240

Tel : +82 54-280-6114

Fax : +82 54-285-9009

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1. Introduction

- 1.1. POSCO STEELION is a Korean steel manufacturer specialising in metallic coated sheet products, including commodity code 7210 6900 80 and 7210 6100 20 which fall under Category 4 of this review.
- 1.2. We note the TRA's final determination intent to maintain the current tariff rate quota (TRQ) and not remove commodity code 7210 6900 80 and 7210 6100 20 from safeguard measures. This submission outlines our position and requests reconsideration of this decision.

2. Product Characteristics and UK Production Status

- 2.1. Commodity code 7210 6900 80 products are designed for high corrosion resistance and high-temperature durability.
- 2.2. UK domestic producer does not manufacture aluminium coated flat steel.
- 2.3. UK domestic producer produces other metallic coated products, which TRA has deemed "directly competitive", but these lack the specific high-temperature performance as evidenced in the submitted document "[POSCOSTEELEON] Difference between AL and GI", commodity code 7210 6900 80 (aluminium coated steel) maintains superior high-temperature performance compared to galvanised steel, making it indispensable for certain industrial applications.

3. Rebuttal to Direct Competitiveness Assessment

- 3.1. TRA's assessment of physical and commercial similarity does not fully reflect the functional differences and the distinct market segmentation.
- 3.2. Aluminium coating withstands temperatures above 400°C, maintaining protective oxide layers. Zinc-based or other metallic coatings produced domestically lose protective properties under high heat.
- 3.3. Commodity code 7210 6900 80 products are used in specialised industries requiring high-temperature resistance such as automotive exhaust systems, heat shields, and combination boilers. Domestic products are primarily used in low-

temperature environments such as building exteriors and general structural applications.

- 3.4. Commodity code 7210 6900 80 products carry a premium (£110–130/ton) due to specialised alloy composition and manufacturing processes. This premium reflects performance differentiation, not simple price competition.

4. Impact of Maintaining TRQ for Commodity Code 7210 6900 80

- 4.1. The UK does not produce commodity code 7210 6900 80 products. Maintaining TRQ with country-specific caps (15% residual quota for Category 4) risks supply shortages when Korean quota is exhausted.
- 4.2. Shortages will impact automotive and thermal appliances sectors, causing production delays, increased procurement costs, and potential quality risks.

5. Requests

We respectfully request the TRA to :

- 5.1. Remove commodity code 7210 6900 80 from safeguard measures.
- 5.2. Reassess TRQ application for product codes with no domestic production.
- 5.3. Consider functional performance, application-specific requirements, and market segmentation in direct competitiveness assessments.

6. Conclusion

- 6.1. POSCO STEELION urges the TRA to reconsider its decision regarding commodity code 7210 6900 80.
- 6.2. Our product is essential for certain UK industries with no domestic equivalent, and is critical to maintaining the UK's global competitiveness in automotive and thermal appliances sectors. Adjusting safeguard measures will ensure stable supply chains and support UK industrial competitiveness.