

NON-CONFIDENTIAL

Trade Remedies Authority
Premier House
60 Caversham Road
Reading
RG1 7EB
United Kingdom

**Response to POSCO comments
on anti-dumping investigation concerning hot-rolled steel plates
imported into the United Kingdom from the Republic of Korea (No. AD0071)**

I. ANTI-DUMPING INVESTIGATION

- 1.1. On 6 June 2025, the Trade Remedies Authority (**the “TRA”**) issued the Notice of an initiation of an investigation into alleged dumping (**the “investigation”**) of hot-rolled steel plates imported into the United Kingdom from the Republic of Korea (**the “Product”**).
- 1.2. The investigation was initiated following the Anti-dumping and Subsidy Investigations: Application form, submitted by Spartan UK Limited on 3 April 2025 (**the “Application to initiate the investigation”**).
- 1.3. On the 7 January 2026, the TRA published the Proposal to revise the scope of the investigation (**the “Proposal”**) where it suggested to remove hot rolled plate products 2500 mm wide and over from the description of the goods concerned.
- 1.4. On 24 February 2026, the TRA published the POSCO comments on anti-dumping investigation concerning hot-rolled steel plates imported into the United Kingdom from the Republic of Korea (No. AD0071) (**the “POSCO Response”**), which go beyond just comments to the Proposal and elaborates on other aspects of the investigation.
- 1.5. Thus, Spartan UK Limited (**the “Company”**) submits this *Response to POSCO comments on anti-dumping investigation concerning hot-rolled steel plates imported into the United Kingdom from the Republic of Korea (No. AD0071)* (**the “Response”**) based on Arts. 6.2 and 6.4 of the *Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994* (**the “ADA”**).

II. THE COMPANY’S STATUS OF THE UK INDUSTRY

- 2.1. To begin with, the Company stresses that POSCO’s accusations about the lack of the Company’s status in the UK industry are groundless. Under the sch. 4 para. 9(1) of the Taxation (Cross-border Trade) Act 2018 (**the “Act”**), the TRA initiates a dumping investigation “it is requested to initiate an investigation in an application *made by or on behalf of a UK industry in the goods*”.
- 2.2. On 3 April 2025, the Company submitted the *Application to initiate the investigation*. While initiating the investigation, the Company indicated the scope of the imported Product in the following way:

“Hot-rolled steel plates (alternative names for the same product - hot-rolled plates, quarto plates, reversing mill plates) are flat steel products having almost rectangular cross sections, the width being much greater than the thickness, produced by rolling of steel to dimensions and physical properties (strength, resistances, weldability etc.) required for final applications (bridge construction, machine manufacturing, shipbuilding etc.). Hot-rolled steel plate is a flat steel product (rolled initially in flat form unlike coil products) produced in the following common dimension ranges:

 - *Thickness: 8-80mm (thicknesses outside of this range are required for particular applications and not considered commodity plate)*
 - *Widths: 1500-3100mm (outside of this range considered customized product)*
 - *Lengths: 4.000 – 12.000mm (commercial sizes 4,5,6,8,12m, 80-90% of the total consumption) ...”*
- 2.3. The Company submitted to the TRA all the relevant data regarding the Company’s share in the UK production volumes while initiating the investigation. In addition, the Company provided the letter supporting the initiation of the investigation prepared by Liberty Steel Dalzell Limited (**the “Liberty”**) (*this letter was attached only to the confidential version of the Application to initiate the investigation*). Following the analysis of the *Application to initiate the investigation*, the TRA established that the Company indeed represents “*a major proportion of the total production in the United Kingdom*” and chose to initiate the investigation by the Notice of an initiation dd. 6 June 2025. Thus, at the time of the initiation of the investigation, it was properly established that there is the “UK industry” within the meaning of sch. 4 para. 6 of the Act.

- 2.4. Following consideration of the Company’s *Application to initiate the investigation*, the TRA made the scope of the Product more precise and extended it in the Notice of an initiation. The extended scope of the investigation was described as follows:

“hot-rolled steel plates (alternative names for the same product – hot-rolled plates, quarto plates, reversing mill plates) described as:

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

Flat-rolled products of iron or non-alloy steel, of a width of 600mm or more, clad; and/or

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.”

- 2.5. The updated scope of the investigation also covered the production of Tata Steel UK’s (“Tata”). At the same time, the Company stresses that Tata, as POSCO properly noted, is an active participant in the investigation and provided the response to the questionnaire of the domestic producer. Therefore, the TRA received the data regarding the production volumes of Tata and can easily check whether there is a UK industry even after the extension of the Product scope.

The TRA proceeded with the investigation and did not suspend it. Thus, POSCO has no grounds to assume that the production volumes of the UK producers participating in the investigation do not amount to a sufficient share to constitute the UK industry.

III. THE APPROPRIATE SCOPE OF THE PRODUCT AND ITS COMPETITION WITH THE LIKE GOODS

- 3.1. POSCO alleged that *“hot-rolled steel plates with a width greater than 2,100 mm are neither interchangeable with nor share the same end uses as those with widths less than 2,100 mm”*.¹ Based on that, POSCO tried to argue that, first, there is no competitive overlap between the Product and like goods and, second, that there is no injury to the UK industry due to the absence of competition between the Product and like goods.
- 3.2. Firstly, the Company stresses that not only wide plates were imported into the UK from the Republic of Korea. In fact, the import of plates which are wider than 2050 mm constitutes around only 16% of all the imports of the Product declared over 2024-2026.² Thus, POSCO’s attempt to fully differentiate the imported Product from the domestic like goods is very manipulative.
- 3.3. Secondly, the competition exists even between plates of different widths. For instance, narrower and wider plates perfectly compete with each other when they are used for profiling shapes. In this scenario, where a company is cutting profiles out of a plate (for example, for the side arms of an earthmover), a company will ‘nest’ the profiles (plan how best to get them out of the size of plate they have) for minimum waste. A company could ‘nest’ their shapes for a 2 m plate, or ‘nest’ them for a 2.5 m plate, as appropriate in many cases.
- 3.4. Moreover, the Company uses this *Response* to stress that POSCO’s position about the limitation of the goods’ concerned width at 2100 mm, will allow South Korean producers to start supplying slightly wider plates to get past the tariffs and thereby significantly affect the Company as a domestic producer. Furthermore, pricing is driven by tonnage. Bringing in slightly wider plates, at say 2101 mm, will have a more marginal impact on costs and may make circumvention attractive depending on the tariff rate.

¹ POSCO Response, p. 6

² ISSB data

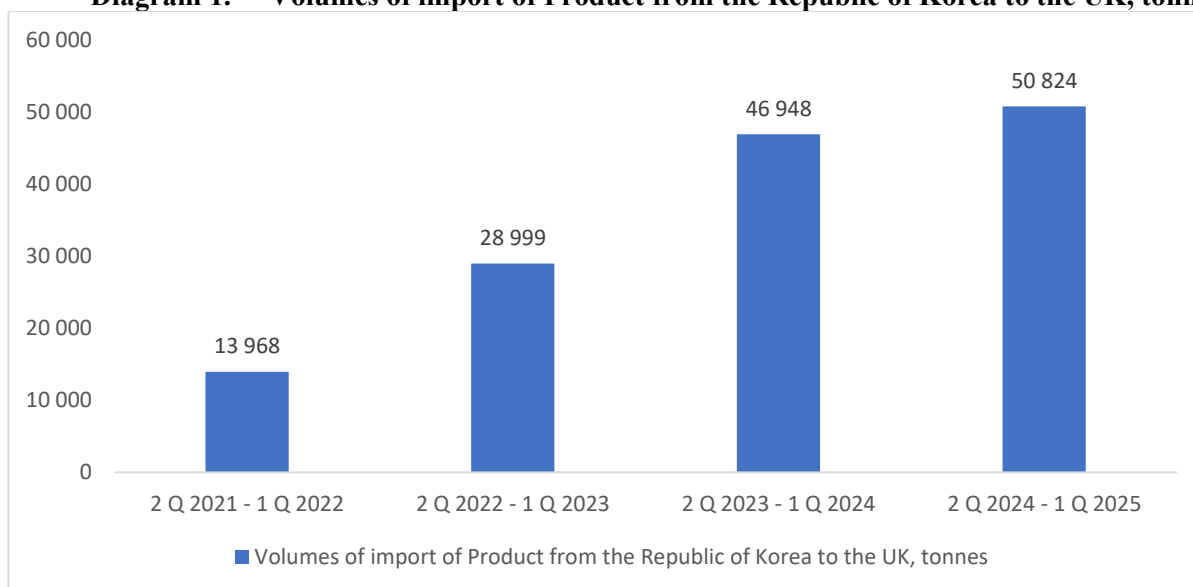
IV. THE INJURY CAUSED TO THE UK INDUSTRY

4.1. POSCO presented manipulative arguments regarding the absence of injury on the part of the UK industry and disregarded the obvious facts that all the circumstances confirm that the injury was caused to the UK industry by the dumped import from the Republic of Korea: (i) there was an increase in dumped imports from the Republic of Korea; (ii) the import from the Republic of Korea was cheaper than from any other country; (iii) the Company's economic indicators related to the domestic market performance decreased over the injury period.

An increased amount of the dumped imports from the Republic of Korea

4.2. As the Company submitted in the *Application to initiate the investigation*, the import volumes increased significantly since 2021. During the injury period, the import volumes of the Product from the Republic of Korea increased by 264% in absolute volumes.

Diagram 1. Volumes of import of Product from the Republic of Korea to the UK, tonnes³



4.3. Over the injury period, the relative indicators of the import volumes from the Republic of Korea in the Company's output also increased significantly by more than 5 times.

Diagram 2. Shares of the import volumes from the Republic of Korea in the Company's output, %

Indicators	2 Q 2021 - 1 Q 2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
Volumes of import of Product from the Republic of Korea to the UK, tonnes	13 968	28 999	46 948	50 824
Dynamics to the base period, %	100%	208%	336%	364%
Volumes of Company's output, tonnes	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics to the base period, %	100%	89%	87%	67%
<i>Shares of the import from the Republic of Korea in the Company's output, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics to the base period, %	100%	233%	386%	546%

3

Indicators	2 Q 2021 - 1 Q 2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
Volumes of import of Product from the Republic of Korea to the UK, tonnes	13 968	28 999	46 948	50 824
Dynamics to the base period, %	100%	208%	336%	364%

The absolute indicators of the Company's output were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties. The absolute indicators of the share of imports from the Republic of Korea in the Company's output were redacted, as this data was calculated using the Company's output volumes, and can be used to calculate the Company's confidential information, which cannot be disclosed to third parties.

- 4.4. Over 2022-2025, the relative indicators of the import volumes from the Republic of Korea in the UK domestic consumption more than doubled.

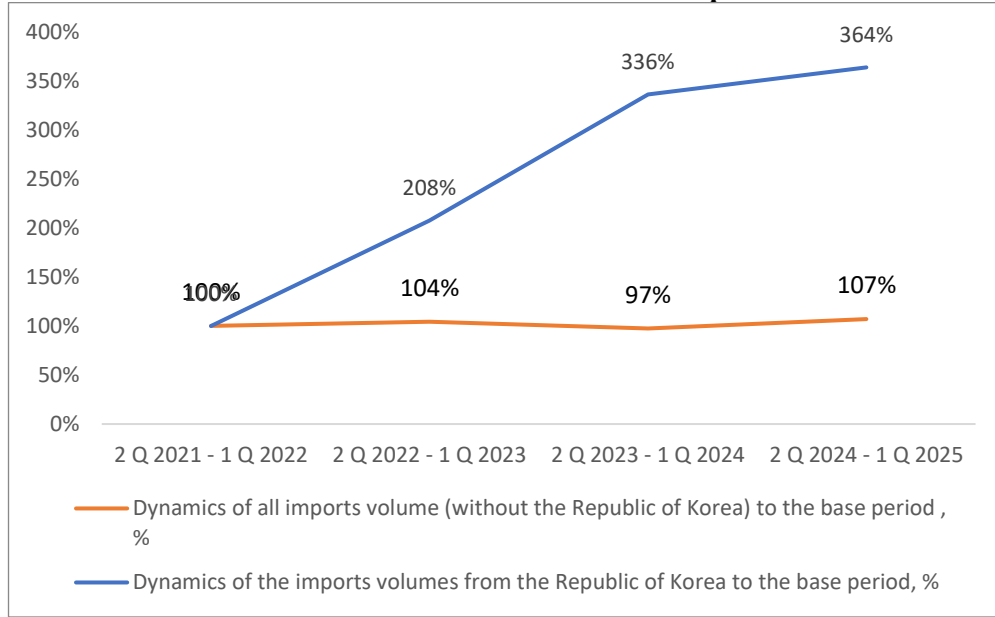
Diagram 3. Shares of the import volumes from the Republic of Korea in the UK domestic consumption, %

Indicators	2022	2023	2024	2025
Volumes of import of Product from the Republic of Korea to the UK, tonnes	26 830	42 231	42 391	57 120
Dynamics to the base period, %	100%	157%	158%	213%
Volumes of UK domestic consumption, tonnes	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics to the base period, %	100%	105%	93%	104%
Share of the import from the Republic of Korea in the UK domestic consumption, %	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics to the base period, %	100%	150%	170%	204%

The absolute indicators of the UK domestic consumption and the share of the import from the Republic of Korea in the UK domestic consumption were redacted, as this data was calculated using the Company's sales volumes and can be used to calculate the Company's confidential information, which cannot be disclosed to third parties.

- 4.5. The POSCO's arguments that the share of imports from the Republic of Korea is small and that "even all Korean imports remain a small fraction compared to the EU" are speculative.⁴ They disregard the fact that (i) the import volumes from the Republic of Korea increased much more drastically than import volumes from all other countries, and (ii) prices of imports from the Republic of Korea were lower than import prices from all other countries.
- 4.6. While the import from all other countries increased by only 7%, the import volumes from the Republic of Korea more than tripled.

⁴ POSCO Response, p. 29

Diagram 4. Comparison of the dynamics of volumes increase of import from the Republic of Korea and imports from all other countries, %⁵**Table 1. Comparison of the import volumes from the Republic of Korea and imports from all other countries**

Indicators	2 Q 2021 - 1 Q 2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
All import volumes of the Product (without the volumes from the Republic of Korea), tonnes	279 632	292 069	272 625	299 417
Dynamics of all imports volume (without the Republic of Korea) to the base period, %	100%	104%	97%	107%
Volumes of import of Product from the Republic of Korea to the UK, tonnes	13 968	28 999	46 948	50 824
Dynamics of the imports volumes from the Republic of Korea to the base period, %	100%	208%	336%	364%

4.7. In the *Application to initiate the investigation*, the Company provided the data on the prices of imports from different countries, proving that the imports from the European countries are usually more expensive than the Korean imports of the Product. Thus, imports from the European countries cannot cause injury to the Company because their prices are higher than the Company's prices.

Table 2. Comparison of the import prices of the Product of different origin

Indicator ⁶	2021	2022	2023	2024
The Company's UK domestic price, GBP/ton	[redacted]	[redacted]	[redacted]	[redacted]

5

Indicators	2 Q 2021 - 1 Q 2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
Volumes of import of Product from the Republic of Korea to the UK, tonnes	13 968	28 999	46 948	50 824
Dynamics of the imports volumes from the Republic of Korea to the base period, %	100%	208%	336%	364%
All import volumes of the Product (without the volumes from the Republic of Korea), tonnes	279 632	292 069	272 625	299 417
Dynamics of all imports volume (without the Republic of Korea) to the base period, %	100%	104%	97%	107%

⁶ ISSB data

NON-CONFIDENTIAL

<i>Dynamics to the base period, %</i>	100%	144%	111%	96%
The Republic of Korea import price, GBP/ton	640	996	728	609
<i>Ratio of export price from The Republic of Korea to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	108%	102%	99%
Netherlands import price, GBP/ton	925	1 037	867	815
<i>Ratio of export price from Netherlands to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	77%	84%	92%
Sweden import price, GBP/ton	921	1 212	1 155	1 208
<i>Ratio of export price from Sweden to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	91%	112%	136%
Germany import price, GBP/ton	898	1 170	1 099	940
<i>Ratio of export price from Germany to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	90%	109%	108%
Finland import price, GBP/ton	894	1 186	1 121	820
<i>Ratio of export price from Finland to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	92%	113%	96%
Denmark import price, GBP/ton	732	1 144	961	852
<i>Ratio of export price from Denmark to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	108%	118%	121%
Spain import price, GBP/ton	718	1 104	935	840
<i>Ratio of export price from Spain to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	107%	117%	122%
France import price, GBP/ton	730	1 372	1 414	2 139
<i>Ratio of export price from France to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	131%	173%	305%
Belgium import price, GBP/ton	807	1 317	1 289	1 309
<i>Ratio of export price from Belgium to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	114%	144%	169%
Austria import price, GBP/ton	1 009	1 599	1 436	1 585
<i>Ratio of export price from Austria to the Company's price, %</i>	[redacted]	[redacted]	[redacted]	[redacted]
<i>Dynamics to the base period, %</i>	100%	110%	128%	164%

The absolute indicators of the Company's domestic prices were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties. The ratio of the export prices to the Company's prices was redacted, as this data was calculated using the Company's sales prices and can be used to calculate the Company's confidential information, which cannot be disclosed to third parties.

- 4.8. POSCO, in its response, tried to suggest that “*the increase in Korean imports was largely driven by re-export activities.*”⁷ According to POSCO, these volumes of imports were processed in the UK and re-exported. The Company stresses that the fact that the goods were re-exported or processed does not change the fact that those goods are accounted as imports and should be taken into account when establishing that the goods are dumped and imported in increased quantities.
- 4.9. Finally, the Company stresses that not only has the import from the Republic of Korea already increased, but there is also a threat of further increase in the export volumes with origin in this country. As the Company provided in the *Application to initiate the investigation*, the Republic of Korea has large unutilised capacities that could be forwarded to the UK, especially in view of the current protectionist trends in the world.

Table 3. Free production capacities in the Republic of Korea, kt

Indicator	2021	2022	2023
Capacity, kt.	13 675	13 677	13 592
Production, kt.	8 889	8 343	8 835
Capacity utilization %	65	61	65
Free production capacities, kt.	4 786	5 334	4 757

Table 4. The ratio of free capacity of the Republic of Korea to UK consumption of the Product

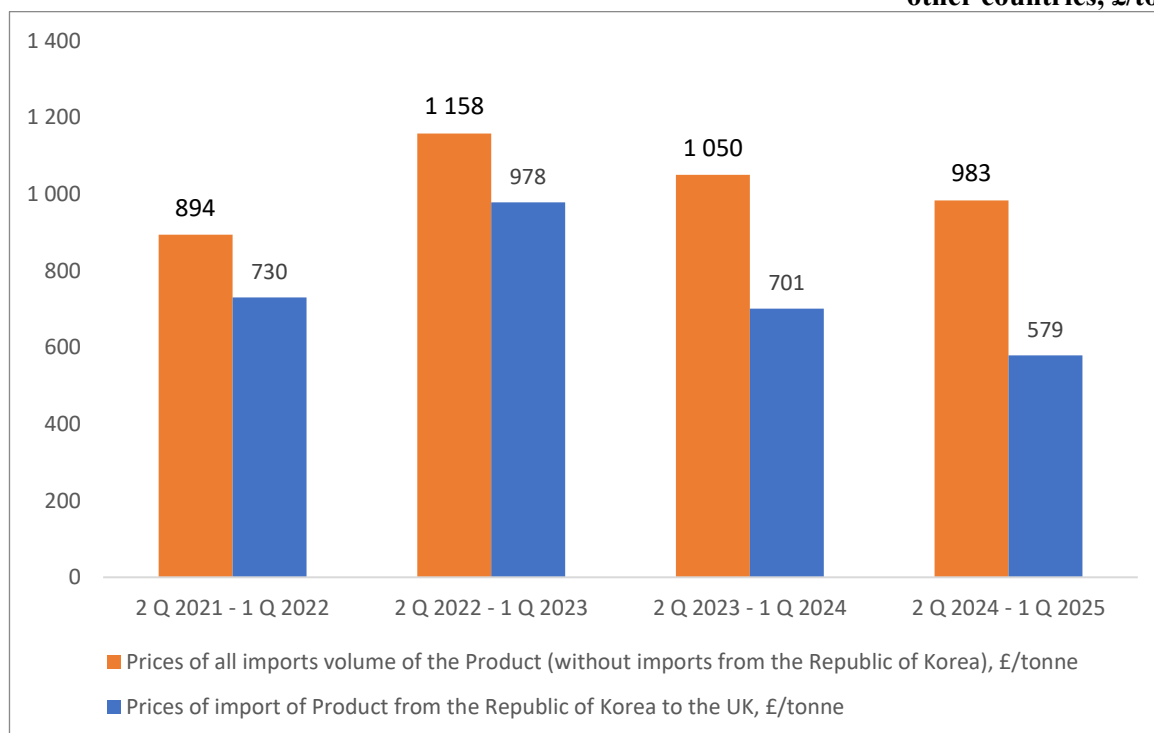
Indicator	2021	2022	2023
Free production capacities, kt.	4 786	5 334	4 757
Total UK Consumption, kt	[redacted]	[redacted]	[redacted]
Dynamics to the base period, %	100	98	103
The ratio of free capacity to UK consumption	[redacted]	[redacted]	[redacted]
Dynamics to the base period, %	100	122	100

The absolute indicators of the UK domestic consumption and the ratio of free capacity to UK consumption were redacted, as this data was calculated using the Company’s sales volumes and can be used to calculate the Company’s confidential information, which cannot be disclosed to third parties.

Prices of the dumped imports from the Republic of Korea

- 4.10. Moreover, the Company points out that the prices of imports from the Republic of Korea are much lower than the prices of imports from all other countries. While the import prices from the Republic of Korea decreased by 21% over the injury period, the import prices from all other countries increased by 10% over the injury period.

⁷ POSCO Response, p. 29

Diagram 5. Comparison of the import volumes from the Republic of Korea and imports from all other countries, £/tonne⁸

- 4.11. This proves not only that the increase in import volumes from the Republic of Korea was much more severe than from all other countries, but also that the reason for this increase was the low import prices. Thus, it is unreasonable for other parties to suggest that the imports of the Product from the Republic of Korea cannot affect the UK producers due to its allegedly low volumes.

The Company stresses that the import prices of the Product from the Republic of Korea are not only lower than the import prices from all other countries but are also lower than the Company's domestic sales prices during the whole period of injury.

Diagram 6. Comparison of the import prices of the Product from the Republic of Korea and the Company's domestic sales prices of the Product, £/tonne

Indicators	2 Q 2021 - 1 Q 2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
Prices of import of Product from the Republic of Korea to the UK, £/tonne	730	978	701	579
Dynamics to the base period, %	100%	134%	96%	79%
Company's domestic sales prices of the Product, £/tonne	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics to the base period, %	100%	131%	95%	82%

The absolute indicators of the Company's domestic sales prices of the Product were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties.

8

Indicators	2 Q 2021 - 1 Q 2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
Prices of all imports volume of the Product (without imports from the Republic of Korea), £/tonne	894	1 158	1 050	983
Dynamics to the base period, %	100%	130%	117%	110%
Prices of import of Product from the Republic of Korea to the UK, £/tonne	730	978	701	579
Dynamics to the base period, %	100%	134%	96%	79%

Injury caused to the Company

- 4.12. As the Company's response to the questionnaire of the domestic producer showed, the economic indicators of the Company dropped over the injury period. While POSCO suggested that the Company suffered the injury on the market of third countries due to its export activity, the Company stresses that the injury can be shown based on the decrease of the economic indicators related to the UK domestic market.
- 4.13. For instance, the domestic sales of the Product of the Company dropped both in volumes and in value over the injury period by 27% and by 40% respectively.

Diagram 7. Domestic sales of the Company by volume, tonne

Indicators	2 Q 2021	2 Q 2022	2 Q 2023	2 Q 2024
	- 1 Q 2022	- 1 Q 2023	- 1 Q 2024	- 1 Q 2025
Domestic sales of the Company by volume, tonne	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics of the domestic sales by volume to the base period, %	100%	72%	84%	73%

The absolute indicators of the Company's domestic sales by volume were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties.

Diagram 8. Domestic sales of the Company by value, £

Indicators	2 Q 2021	2 Q 2022	2 Q 2023	2 Q 2024
	- 1 Q 2022	- 1 Q 2023	- 1 Q 2024	- 1 Q 2025
Domestic sales of the Company by value, £	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics of the domestic sales by value to the base period, %	100%	94%	80%	60%

The absolute indicators of the Company's domestic sales by value were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties.

- 4.14. The prices of the Company's domestic sales of the Product decreased by 18% in the fourth annual injury period compared to the base period.

Diagram 9. Price of domestic sales of the Company, £/tonne

Indicators	2 Q 2021	2 Q 2022	2 Q 2023	2 Q 2024
	- 1 Q 2022	- 1 Q 2023	- 1 Q 2024	- 1 Q 2025
Price of domestic sales of the Company, £/tonne	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics of the prices of the domestic sales to the base period, %	100%	131%	95%	82%

The absolute indicators of the price of domestic sales of the Company were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties.

- 4.15. The Company's market share in the domestic market of the Product has also dropped over the injury period.

Diagram 10. Company's market share in the domestic market of the Product, %

Indicators	2 Q 2021	2 Q 2022	2 Q 2023	2 Q 2024
	- 1 Q 2022	- 1 Q 2023	- 1 Q 2024	- 1 Q 2025

The percentage of UK markets total sales of like goods that are manufactured by the Company, %	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics of the percentage of UK markets total sales of like goods to the base period, %	100%	72%	82%	76%

The absolute indicators of the percentage of UK markets total sales of like goods that are manufactured by the Company were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties.

- 4.16. Thus, the Company's economic indicators prove that the Company suffered the injury within the meaning of Arts. 3.1(b) and 3.4 of the ADA and regulation 30 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the "**Trade Remedies Regulation**").

Injury of other domestic producers

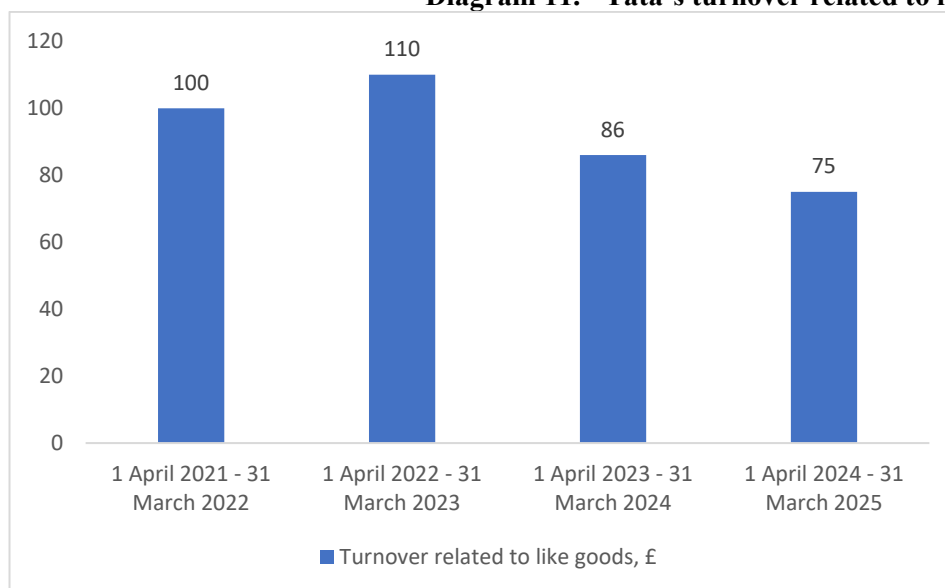
- 4.17. POSCO's position that the Company is the only domestic producer that suffered injury during the injury period is also not true. Firstly, POSCO tried to argue that Liberty's lack of registration or response to the questionnaire within the investigation indicates the lack of interest and lack of injury from the imports of the Product from the Republic of Korea. POSCO, after recognising the existence of Liberty's letter of endorsement, fully ignores its evidentiary value.
- 4.18. In the letter of endorsement, Liberty formally expressed that it supports the Company's *Application to initiate the investigation*. [redacted]. Thus, POSCO's statement that the "*lack of engagement strongly suggests that Liberty Steel, as a domestic hot-rolled steel plate producer, has not been injured by the imports from Korea and does not require protection in that regard*"⁹ is groundless and manipulative.

The information from the Liberty's letter of endorsement was redacted as the letter was provided to the Company on a confidential basis and cannot be disclosed to third parties.

- 4.19. Secondly, as the Company provided in the *Comments of Spartan UK Limited to responses to the questionnaire of the interested parties to the anti-dumping investigation in respect of hot-rolled steel plate from South Korea*, Tata's economic indicators demonstrated a decline, which correlated with the increase in imports of Product from the Republic of Korea, even though Tata decided not to comment on it. At the same time, Tata never argued against the Company's arguments that the injury suffered by Tata was caused by the imports of Product from the Republic of Korea. Such behaviour proves that Tata does not oppose such a case being made on its behalf and accepts such a position.
- 4.20. For convenience, the Company provides the evidence of the decrease in the economic indicators of Tata below. Tata's turnover related to like goods decreased by 25% over the injury period.

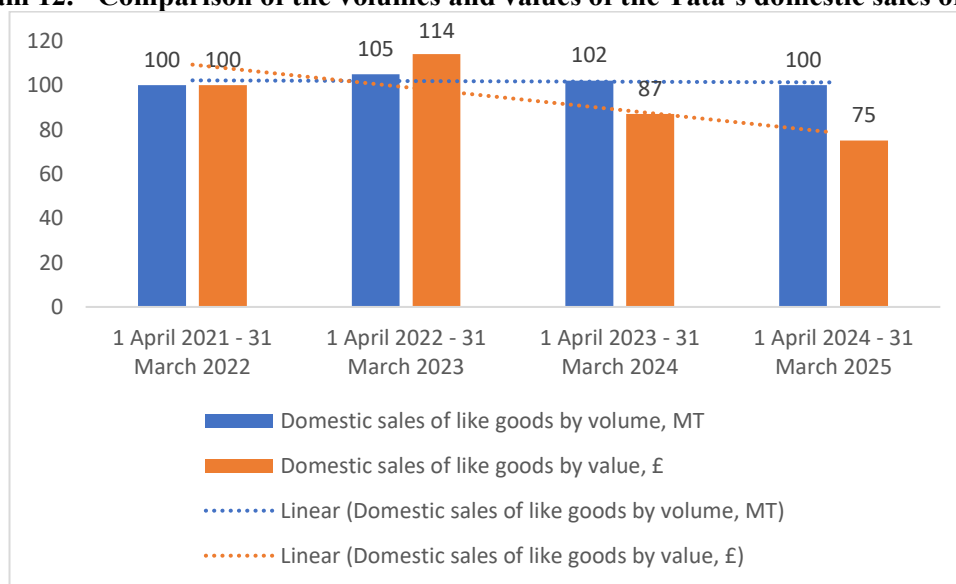
⁹ POSCO Response, p. 9

Diagram 11. Tata’s turnover related to like goods, £¹⁰



4.21. Analysis of Tata’s indicators related to the domestic sales of the like goods revealed that the prices of the like goods at the UK domestic market dropped over the injury period. In turn, while the volume of domestic sales remained stable over the injury period, the value of such sales decreased by 25%. Accordingly, the domestic sales price of the like products dropped by 25%.

Diagram 12. Comparison of the volumes and values of the Tata’s domestic sales of like goods¹¹



¹⁰ Annex 11 of the Tata Steel UK’s questionnaire response

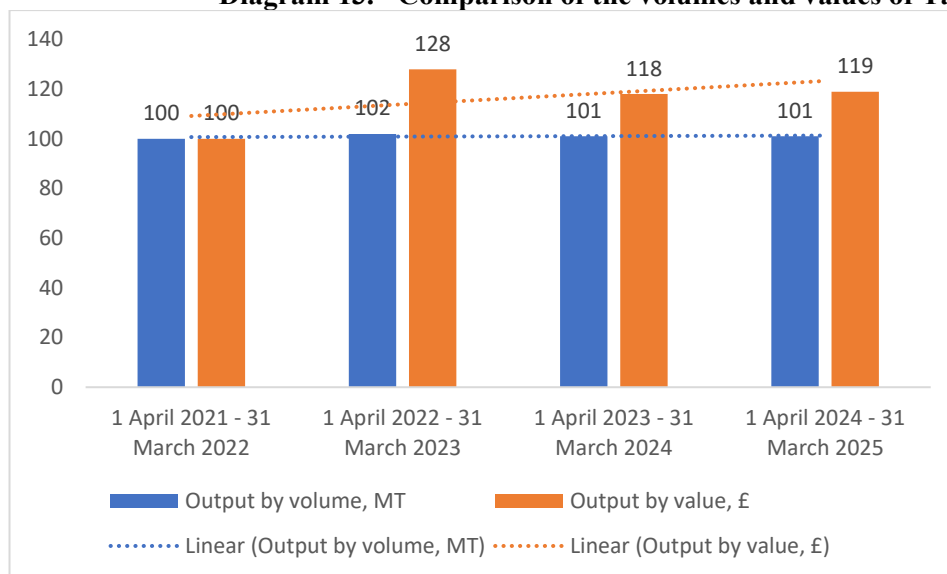
Indicator	1 April 2021 - 31 March 2022	1 April 2022 - 31 March 2023	1 April 2023 - 31 March 2024	1 April 2024 - 31 March 2025
Turnover related to like goods, £	100	110	86	75

¹¹ Annex 11 of the Tata Steel UK’s questionnaire response

Indicator	1 April 2021 - 31 March 2022	1 April 2022 - 31 March 2023	1 April 2023 - 31 March 2024	1 April 2024 - 31 March 2025
Domestic sales of like goods by volume, MT	100	105	102	100
Domestic sales of like goods by value, £	100	114	87	75

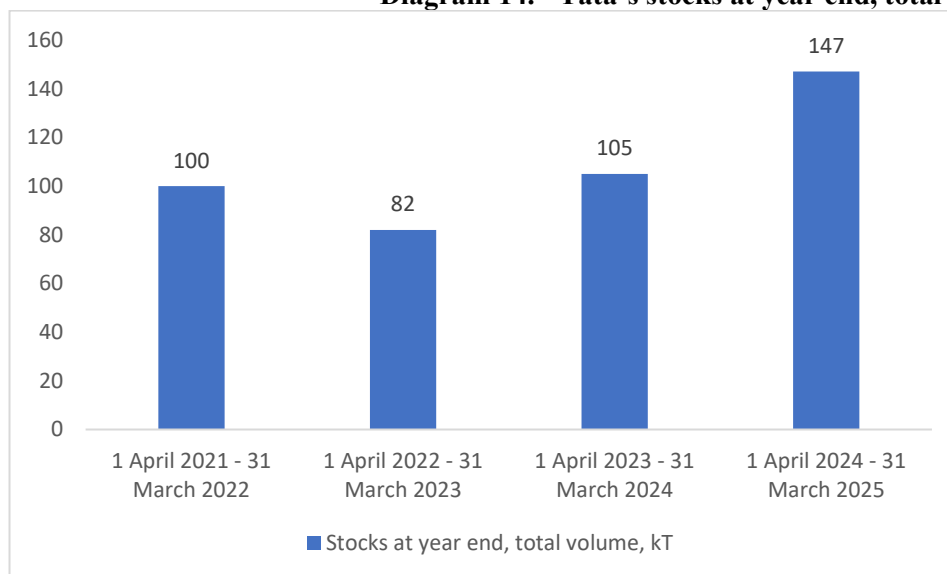
4.22. Meanwhile, the costs of production seemed to have increased during the injury period. Over the injury period, the volumes of output increased by only 1%, while the values of output increased by 19%.

Diagram 13. Comparison of the volumes and values of Tata’s output¹²



4.23. During the injury period, the stocks at year end increased by 47%.

Diagram 14. Tata’s stocks at year end, total volume, kT¹³



¹² Annex 11 of the Tata Steel UK’s questionnaire response

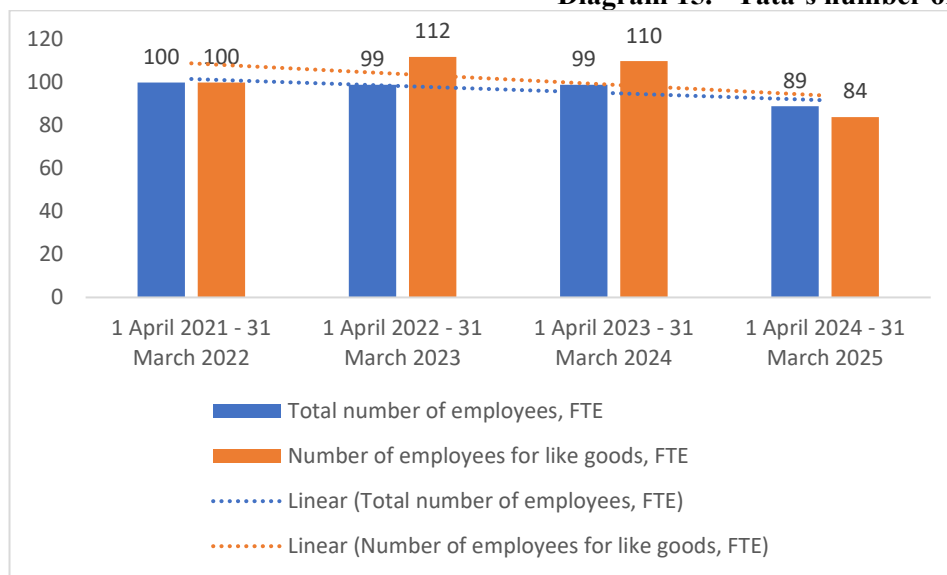
Indicator	1 April 2021 - 31 March 2022	1 April 2022 - 31 March 2023	1 April 2023 - 31 March 2024	1 April 2024 - 31 March 2025
Output by volume, MT	100	102	101	101
Output by value, £	100	128	118	119

¹³ Annex 11 of the Tata Steel UK’s questionnaire response

Indicator	1 April 2021 - 31 March 2022	1 April 2022 - 31 March 2023	1 April 2023 - 31 March 2024	1 April 2024 - 31 March 2025
Stocks at year end, total volume, kT	100	82	105	147

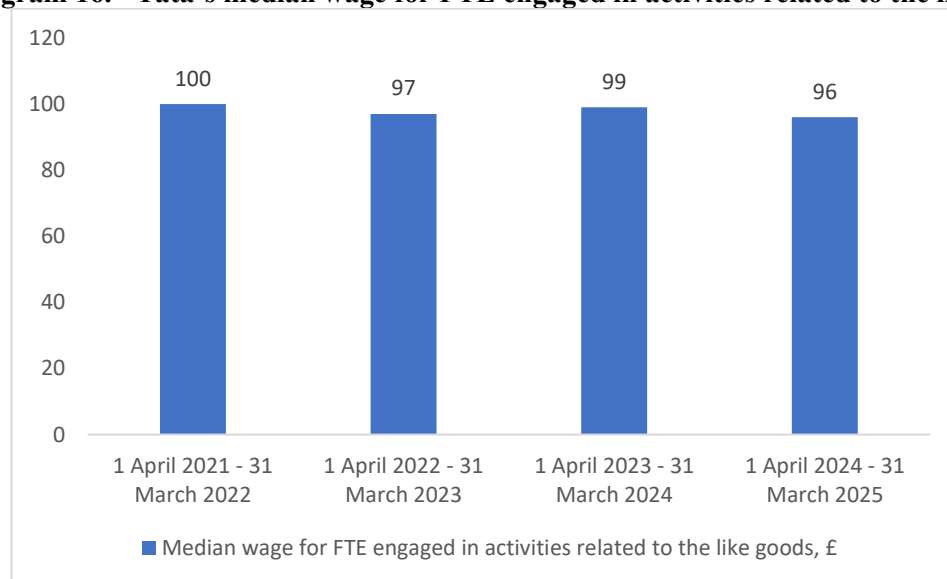
4.24. The number of employees of Tata decreased during the injury period. Specifically, the total number of employees decreased by 11%, while the number of employees for like goods decreased by 16%.

Diagram 15. Tata’s number of employees¹⁴



4.25. Despite the inflation, the Tata’s median wage for employees engaged in activities related to the like goods still decreased over the injury period.

Diagram 16. Tata’s median wage for FTE engaged in activities related to the like goods, £¹⁵



¹⁴ Annex 11 of the Tata Steel UK’s questionnaire response

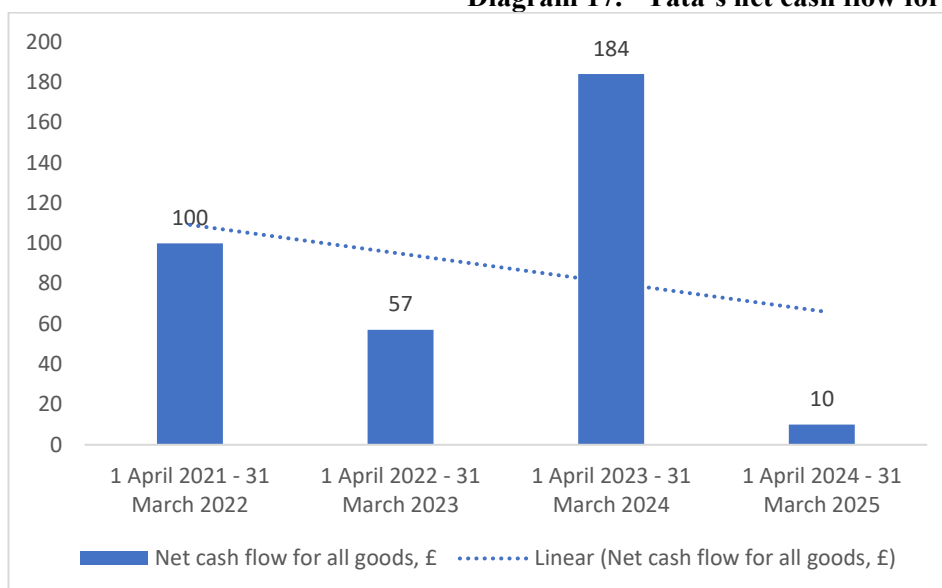
Indicator	1 April 2021 - 31 March 2022	1 April 2022 - 31 March 2023	1 April 2023 - 31 March 2024	1 April 2024 - 31 March 2025
Total number of employees, FTE	100	99	99	89
Number of employees for like goods, FTE	100	112	110	84

¹⁵ Annex 11 of the Tata Steel UK’s questionnaire response

Indicator	1 April 2021 - 31 March 2022	1 April 2022 - 31 March 2023	1 April 2023 - 31 March 2024	1 April 2024 - 31 March 2025
Median wage for FTE engaged in activities related to the like goods, £	100	97	99	96

4.26. Tata's net cash flow for all goods also decreased during the injury period by 90%.

Diagram 17. Tata's net cash flow for all goods, £¹⁶



4.27. Thus, the economic indicators of Tata deteriorated during the injury period which proves that Tata suffered the injury within the meaning of Arts. 3.1(b) and 3.4 of the ADA and regulation 30 of the Trade Remedies Regulation.

V. THE CAUSAL LINK

- 5.1. The Company stresses that there is a causal link between the injury suffered by the UK producers and the increased volumes of the dumped imports from the Republic of Korea within the meaning of Arts. 3.5 (b) and 3.4 of ADA, as well as regulation 27(2)(b) of the Trade Remedies Regulation.
- 5.2. Firstly, there is a precise correlation between the decrease in the economic indicators of the Company related to the domestic market and the increased import volumes from the Republic of Korea at considerably lower prices.

Table 5. Comparison of the import volumes from the Republic of Korea and the domestic indicators of the Company

Indicators	2 Q 2021 - 1 Q2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
Domestic sales of the Company by volume, tonne	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics of the domestic sales by volume to the base period, %	100%	72%	84%	73%
Domestic sales of the Company by value, £	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics of the domestic sales by value to the base period, %	100%	94%	80%	60%
Price of domestic sales of the Company, £/tonne	[redacted]	[redacted]	[redacted]	[redacted]

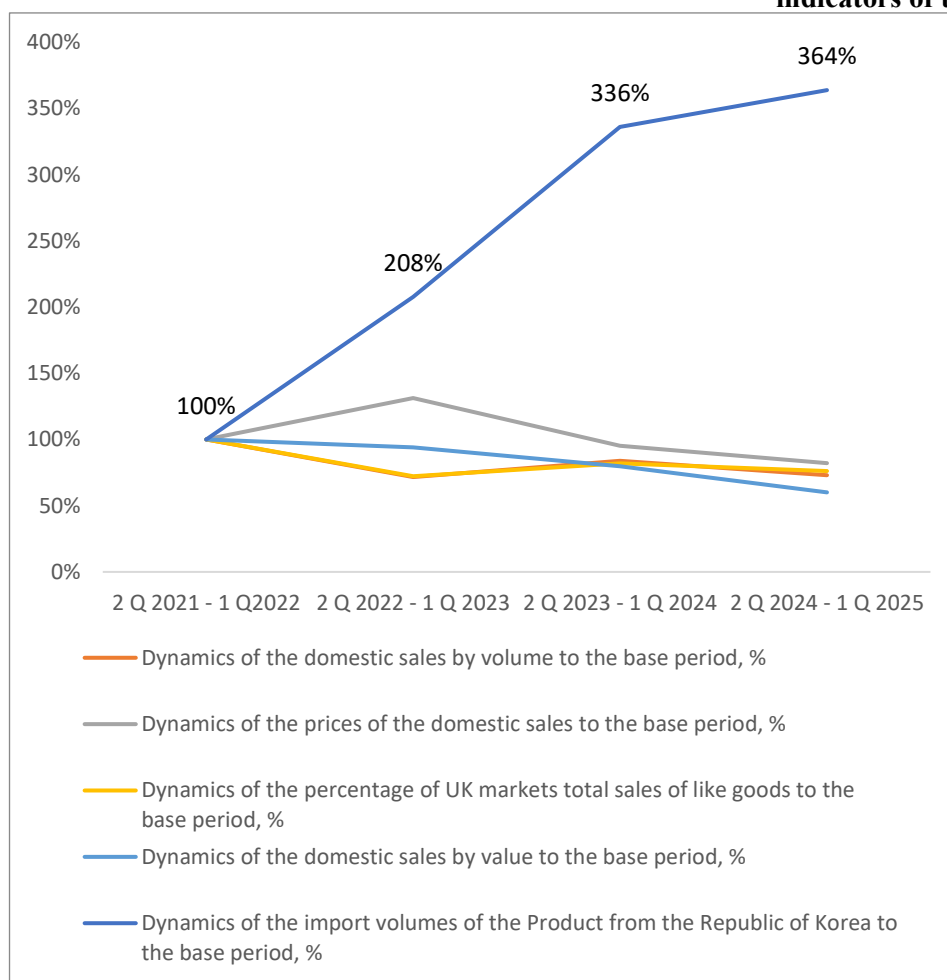
¹⁶ Annex 11 of the Tata Steel UK's questionnaire response

Indicator	1 April 2021 - 31 March 2022	1 April 2022 - 31 March 2023	1 April 2023 - 31 March 2024	1 April 2024 - 31 March 2025
Net cash flow for all goods, £	100	57	184	10

Dynamics of the prices of the domestic sales to the base period, %	100%	131%	95%	82%
The percentage of UK markets total sales of like goods that are manufactured by the Company, %	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics of the percentage of UK markets total sales of like goods to the base period, %	100%	72%	82%	76%
Volumes of import of Product from the Republic of Korea to the UK, tonnes	13 968	28 999	46 948	50 824
Dynamics of the import volumes of the Product from the Republic of Korea to the base period, %	100%	208%	336%	364%

The absolute indicators of the Company's economic indicators were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties.

Diagram 18. Comparison of the import volumes from the Republic of Korea and the domestic indicators of the Company



5.3. Moreover, the injury suffered by Tata was indeed caused by the dumped import from the Republic of Korea. There is a precise correlation between the surge in import volumes of the Product from the Republic of Korea to the UK and the decline of the economic indicators of Tata.

Diagram 19. Comparison of the rates of fluctuations in import volumes of the Product from the Republic of Korea to the UK and the rates of fluctuations of the Tata's economic indicators ¹⁷

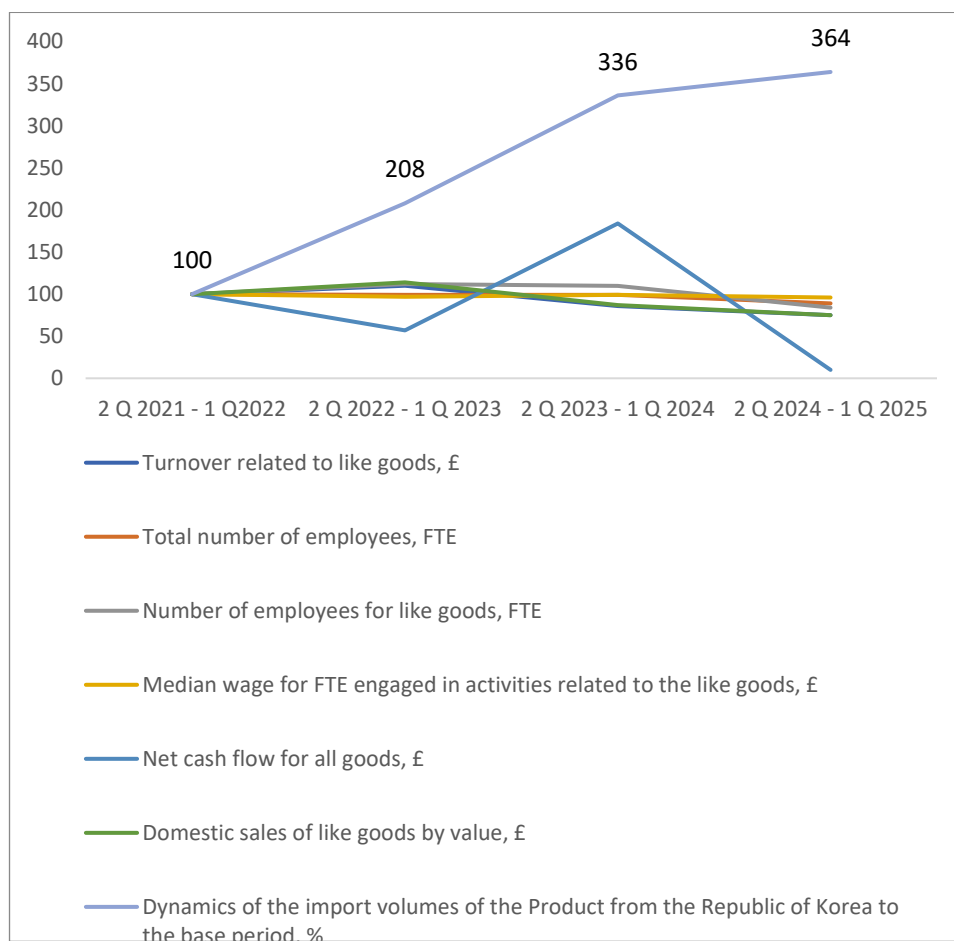


Table 6. Comparison of the rates of fluctuations in import volumes of the Product from the Republic of Korea to the UK and the rates of fluctuations of the Tata's economic indicators ¹⁸

Indicators	2 Q 2021 - 1 Q 2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
Turnover related to like goods, £	100	110	86	75
Total number of employees, FTE	100	99	99	89
Number of employees for like goods, FTE	100	112	110	84

¹⁷ Annex 11 of the Tata Steel UK's questionnaire response and Annex D-2 – Income statement of POSCO's questionnaire response

Indicators	1 April 2021 - 31 March 2022	1 April 2022 - 31 March 2023	1 April 2023 - 31 March 2024	1 April 2024 - 31 March 2025
Turnover related to like goods, £	100	110	86	75
Total number of employees, FTE	100	99	99	89
Number of employees for like goods, FTE	100	112	110	84
Median wage for FTE engaged in activities related to the like goods, £	100	97	99	96
Net cash flow for all goods, £	100	57	184	10
Domestic sales of like goods by value, £	100	114	87	75
Volume of turnover of POSCO for export to the UK	100	217	290	370
Value of turnover of POSCO for export to the UK	100	242	276	304

¹⁸ Annex 11 of the Tata Steel UK's questionnaire response and Annex D-2 – Income statement of POSCO's questionnaire response

Median wage for FTE engaged in activities related to the like goods, £	100	97	99	96
Net cash flow for all goods, £	100	57	184	10
Domestic sales of like goods by value, £	100	114	87	75
Output by value, £	100	128	118	119
Stocks at year end, total volume, kT	100	82	105	147
Dynamics of the import volumes of the Product from the Republic of Korea to the base period, %	100	208	336	364

- 5.4. In POSCO Response, POSCO argued that the WTO jurisprudence (panel in China – X-Ray Equipment) established that “*an analysis based merely on coincidence does not satisfy the requirements of Article 3.5 of the Anti-Dumping Agreement*”.¹⁹ Firstly, the Company stresses that the same panel in the same paragraph also acknowledged that “*an overall correlation between dumped imports and injury to the domestic industry may support a finding of causation.*”²⁰
- 5.5. Secondly, the Company is aware that the panel stressed that “*a coincidence analysis is not dispositive of the causation question*” and a more detailed analysis is required.²¹ At the same time, this comment was driven by the fact that the investigative authority in the quoted case did not consider other factors, besides coincidence between the dumped imports and injury, and ignored the fact that prices of the imported goods were higher than the prices of the domestic goods.²²

In this investigation, the Company does not base its causation analysis solely on the coincidence of trends between the increase in dumped imports and the injury. The Company demonstrated in the *Application to initiate the investigation* and *this Response* that the prices of the Product imported from the Republic of Korea were always lower than the Company’s domestic prices. Moreover, the Company presented arguments regarding the alleged third factors of injury required for the non-attribution analysis in its *Comments to responses to the questionnaire of the interested parties to the anti-dumping investigation in respect of hot-rolled steel plate from South Korea*, and in this *Response* below.

- 5.6. Thus, the Company is not trying to base the causation analysis on the mere coincidence of the domestic producers’ economic indicators’ decline and the increase in dumped import volumes. On the contrary, the Company provided the TRA with the extensive data enabling it to conduct a detailed analysis and reach the conclusion that there is a causal link between the injury suffered by the UK producers and the increased volumes of the dumped imports from the Republic of Korea within the meaning of Arts. 3.5 (b) and 3.4 of ADA, as well as regulation 27(2)(b) of the Trade Remedies Regulation.

Third factors

- 5.7. POSCO suggested that the Company is suffering the injury due to the third factors, which are not associated with the increased dumped imports from the Republic of Korea. While the Company recognised that the injury caused by third factors should not be attributed to the dumped import, in the present case, those factors were not causing the injury to the Company.

The Company’s export sales

- 5.8. POSCO tried to argue that the true reason for the decline in the profitability of the Company is caused by the decrease in export sales of the Company and not by the increased dumped imports from the Republic of Korea on the UK market. As the Company explained in the *Application to initiate the investigation*, even in the export markets, including the EU, the Company faced dumped imports from the Republic of Korea as well. In the *Application to initiate the investigation*, the

¹⁹ POSCO Response, p. 10

²⁰ Panel Report, China – Definitive anti-dumping duties on X-Ray security inspection equipment from the European Union, para. 7.247

²¹ Panel Report, China – Definitive anti-dumping duties on X-Ray security inspection equipment from the European Union, para. 7.247

²² Panel Report, China – Definitive anti-dumping duties on X-Ray security inspection equipment from the European Union, para. 7.247-2.248

Company provided the data on the increased volumes of exports of the Product from the Republic of Korea.

Table 7. Export volumes of the Product from the Republic of Korea, tonnes²³

Indicator	2021	2022	2023	2024	Total
Korea's export volume to USA, t.	227 946	182 400	237 989	186 347	834 682
Korea export to top 5 EU countries by volume, t					
Korea's export volume to Spain, t.	50 839	76 014	138 013	207 739	472 605
Korea's export volume to Italy, t.	16 330	57 329	65 979	165 081	304 719
Korea's export volume to Belgium, t.	34 301	56 958	63 083	131 010	285 352
Korea's export volume to Denmark, t.	8 673	101 890	115 408	45 171	271 142
Korea's export volume to Portugal, t.	9 579	34 026	85 252	95 154	224 011
Total	119 722	326 217	467 735	644 155	1 557 829

5.9. Moreover, the Company stresses that, considering the above, POSCO's statements that "*Finally, Spartan notes that "[o]ne of the reasons for poor export performance of the applicant was active presence of Korean imports in the relevant markets of the EU, such as Belgium".*⁶⁹ This argument is untenable. First, the respective statement does not contain a single footnote with evidence or factual information supporting these assertions."²⁴ is just not true, as the Company supported its argument with the relevant statistical data.

Effects of full-scale invasions of Russia into Ukraine

5.10. POSCO suggested that the full-scale invasion of Russia into Ukraine had a negative influence on the Company's activities. In particular, POSCO stated that "*the siege of Mariupol by Russian forces in early spring 2022 coincided directly with the onset of the Spartan's declining economic performance.*"²⁵ The Company stresses that such arguments are groundless and very manipulative.

5.11. Firstly, the Company highlights that the timeline of the most severe decline of the Company's indicators does not coincide with the timing of the full-scale invasion. As the TRA can see from Annex 11 to the Company's response to the questionnaire, the Company remained profitable for both the second and third annual periods. If POSCO's arguments regarding the influence of the Russian war against Ukraine were correct, the Company should have suffered a more drastic and severe injury immediately after the Russian invasion.

On the contrary, the Company started to experience losses only during the period of investigation, which is two years after the full-scale invasion of Russia, and which coincides with the greatest increase in dumped imports of the Product from the Republic of Korea.

Diagram 20. Comparison of the trends in volumes of imports of Product from the Republic of Korea and the Company's net operating profit after tax (NOPAT) from like goods

Indicators	2 Q 2021 - 1 Q 2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
Volumes of import of Product from the Republic of Korea to the UK, tonnes	13 968	28 999	46 948	50 824
Net operating profit after tax (NOPAT) from like goods, £	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics to the base period, %	100%	66%	68%	-43%

The absolute indicators of the average net operating profit after tax (NOPAT) from like goods were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties.

²³ ISSB data

²⁴ POSCO Response, p. 24

²⁵ POSCO Response, p. 17

Diagram 21. Comparison of the trends in volumes of imports of Product from the Republic of Korea and the Company's Average net operating profit after tax (NOPAT) margin of like goods

Indicators	2 Q 2021 - 1 Q 2022	2 Q 2022 - 1 Q 2023	2 Q 2023 - 1 Q 2024	2 Q 2024 - 1 Q 2025
Volumes of import of Product from the Republic of Korea to the UK, tonnes	13 968	28 999	46 948	50 824
Average net operating profit after tax (NOPAT) margin of like goods, %	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics to the base period, %	100%	58%	82%	-78%

The absolute indicators of the average net operating profit after tax (NOPAT) margin of like goods were redacted as they constitute the Company's confidential information, which cannot be disclosed to third parties.

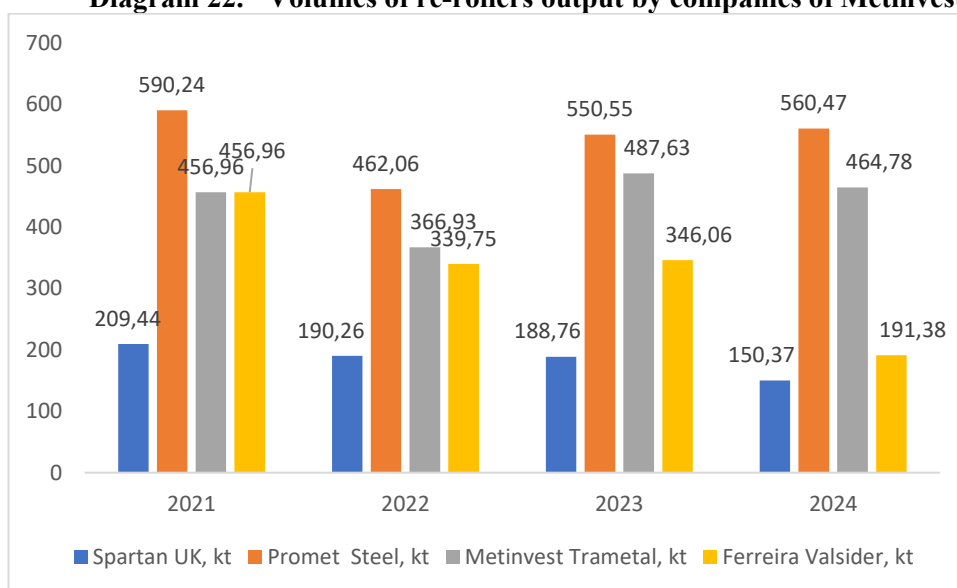
- 5.12. Secondly, the Company points the TRA's attention to the fact that during the second annual period, the volumes of the dumped imports from the Republic of Korea to the UK almost doubled compared with the level of the first annual period, with simultaneous considerable decrease of prices, starting to cause injury to the Company.

The Company's indicators in contrast with other companies of the Metinvest group

- 5.13. POSCO tries to argue that, following the full-scale invasion of Russia into Ukraine, all of the Metinvest Group companies suffered injury, which proves that the injury is not limited to only the Company and is not caused by the dumped imports from the Republic of Korea on the UK market.
- 5.14. The Company submits that such statements cannot be supported even with the data provided by POSCO. A closer look at the output volumes of the companies of Metinvest Group shows that, although all the companies experienced a drop in 2022, the European companies, like Promet Steel and Metinvest Trametel, started to recover in 2023 and 2024.

The Company's indicators have different dynamics. The production drop for the Company in 2022 was not as drastic as for other companies of the Metinvest Group. However, the Company's indicators continued to decline, making it the only company that experienced a stable decrease throughout the whole period of 2022-2024.

Diagram 22. Volumes of re-rollers output by companies of Metinvest Group, kt²⁶



²⁶ Metinvest Annual Reports

Indicators	2021	2022	2023	2024
Spartan UK, kt	209,44	190,26	188,76	150,37

- 5.15. This confirms that while other companies were able to adjust to the new conditions and new supply chains and started to gain back their production volumes, the Company was not able to do it because of the increased volumes of dumped imports from the Republic of Korea coming to the UK market.

Impact of energy sources' price fluctuations

- 5.16. POSCO also mentions that the increase in energy resource prices should have caused an injury to the Company. The Company stresses that the effects of those factors should not be overestimated. First, the energy sources constitute only [redacted] of the total costs to make and sell the Product, which is confirmed by the Company's response to the questionnaire. Thus, the possibility of those price fluctuations' ability to influence the economic indicators of the Company should not be overestimated.

The data about the Company's cost structure was redacted as it constitutes the Company's confidential information, which cannot be disclosed to third parties.

- 5.17. Moreover, as POSCO admitted, the energy source prices peaked in 2022 and started to slow down and gradually declined in the following year.²⁷ That does not correlate with the tendency in the financial indicators of the Company, as was explained above.

Payments of dividends and investments

- 5.18. POSCO suggests that the injury is caused to Spartan due to the "excessive dividend payments totalling £30,000,000 over the two year".²⁸ The Company highlights that this statement is not correct. The payment of dividends to the parent company is a normal business practice. Payment of dividends has no direct influence on the Company's performance in terms of trading profitably, as it does not affect the resale price or the production costs. Payments of dividends influence only the Company's Working Capital position. Thus, all of POSCO's suggestions that the payment of dividends deteriorated the Company's economic conditions, influencing the Company's investment capabilities, are not true.
- 5.19. Moreover, talking about investments, POSCO treats the Company's statement that it "would not envisage any substantial effect on [its] investment plans" in a very rigid manner. The Company just reported that anti-dumping measures would have no substantial effect on the Company's investment plans. Indeed, the Company will maintain its investment plans at the levels that are appropriate to sustain the Company's business and will not significantly deviate from them should anti-dumping measures be introduced. However, it does not mean that the Company has no investment plans, as POSCO tries to make it look.
- 5.20. Thus, there is a causal link between the injury suffered by the UK producers and the dumped import from the Republic of Korea within the meaning of Arts. 3.5 (b) and 3.4 of ADA, as well as regulation 27(2)(b) of the Trade Remedies Regulation.
- 5.21. **Based on the above, the Company believes that, in this investigation, the Company proved all the elements which are required for the affirmative determination under sch. 4 para. 11 of the Act. Therefore, the Company asks the TRA to make an affirmative determination under sch. 4 para. 11 of the Act and to make recommendations about an anti-dumping amount under sch. 4 paras. 17(3) and 18 of the Act**

Promet Steel, kt	590,24	462,06	550,55	560,47
Trametal Metinvest, kt	456,96	366,93	487,63	464,78
Ferreira Valsider, kt	456,96	339,75	346,06	191,38

²⁷ POSCO Response, pp. 18-19

²⁸ POSCO Response, p. 12