

TARIFF RATE QUOTA (TRQ) REVIEW (TQ0077)

NON-PAPER OF THE KOREA IRON AND STEEL ASSOCIATION(KOSA) CONCERNING THE INTENDED DECISION OF THE TRADE REMEDIES AUTHORITY(TRA)

[23 February 2026]

INTRODUCTION

1. The Korea Iron and Steel Association(KOSA), as a representative body of the Korean steel industry, respectfully submits its views on the Intended Final Determination issued by the UK Trade Remedies Authority(TRA) on 13 February 2026.
2. KOSA appreciate the opportunity to comment on the issues concerning Category 4 and Category 7. We value our long-standing constructive partnership with United Kingdom and trust that the TRA will give careful consideration to the views presented below.

OPINIONS ON THE INTENDED DECISION

Category 4

3. The review was initiated with respect to specific commodity codes (7210.61 and 7210.69). However, the intended final determination appears to rely on overall import trends for Category 4 as a whole in maintaining the existing quota structure.
4. According to Korean customs data, Korean Aluzinc exports to the UK have remained at a consistently low level over an extended period, approximately 5,000–7,000 tonnes annually since 2018. It is therefore difficult to interpret Aluzinc imports on the same basis as overall increases in Category 4 imports. The impact of Aluzinc itself is limited, and rejecting a product-specific exclusion on the basis of aggregate coated steel import growth appears to extend the scope of the review beyond its original focus. On the contrary, the relatively high share of Korean Aluzinc within UK Aluzinc imports indicates the UK market's structural reliance on this product rather than evidence of distortion.

5. The determination suggests that Aluzinc may be considered “directly competitive” with other products, such as Galvanized iron(GI) or Zinc-magnesium coated steel(ZM) in the Category 4. However, this conclusion is presented without quantitative analysis or technical comparison. Aluzinc is used in applications requiring specific corrosion resistance design, coating composition, certification standards, and warranty structures. Substitutability cannot be presumed solely on the basis of price differences or HS code categorisation. In the UK market, Aluzinc demand is limited in volume but structurally necessary, serving niche applications such as roofing and cladding materials, HVAC equipment, and automotive components. Since the introduction of the residual country cap, these essential niche demands have become further constrained. Notably, Korean Aluzinc exports to the UK amounted to 5,582 tonnes in 2018 (pre-safeguard) and 5,451 tonnes in 2025, demonstrating stable supply aligned with specific niche demand rather than import surges.

< Korea’s Aluzinc Exports to UK (Category 4) (Metric Tons, %) >

	'17	'18	'19	'20	'21	'22	'23	'24	'25	YoY
Total	2,804	5,582	5,515	5,090	6,323	6,219	4,365	6,675	5,451	-18.3

* Source : Korea Customs

** HS Code : 7210.61

6. The residual country cap (15%) introduced in July 2025 restricts access for specific origins and products even where the overall Category 4 quota remains partially unused. This mechanism risks creating disproportionate supply constraints for downstream users beyond what is necessary to achieve the safeguard’s protective objective. Given the relatively small import volume of Aluzinc, an exclusion would likely have limited impact on the overall market structure while ensuring supply continuity for essential users. Such an approach would allow necessary supply without materially undermining the safeguard measure.

7. To address potential supply disruption, a dedicated sub-quota within Category 4 for Aluzinc (HS 7210.61) could be established to preserve overall market stability while safeguarding essential niche demand. Alternatively, a time-limited exclusion, for example for 12 to 24 months followed by a reassessment of market impact, would represent a

balanced and pragmatic solution, minimising any immediate injury risk while ensuring downstream supply stability.

Category 7

8. Although it has been stated that products exceeding 2,050 mm are produced domestically, it has already been confirmed, in the context of the Korean plate anti-dumping investigation(AD0071), that ultra-wide products exceeding 2,500 mm are not manufactured. In this regard, a more detailed assessment distinguishing specific sizes that are not produced under the relevant commodity codes would represent a more reasonable and proportionate approach to addressing the needs of downstream users.

CONCLUSION

9. The Korean Steel Industry greatly values its close economic partnership with the United Kingdom and remains committed to a constructive engagement. It is our sincere hope that the TRA will give due consideration to the above views when finalising its decision with respect to the Tariff Rate Quota Review.