

No. 138/01 dated 5 February 2026

Trade Remedies Authority
Premier House
60 Caversham Road
United Kingdom

Dear Sirs,

Spartan UK Limited (**the “Company”**) presents its compliments to the Trade Remedies Authority (**the “TRA”**) and, within the antidumping investigation against hot rolled steel plate (**the “goods concerned”**) imported into the United Kingdom from the Republic of Korea (**the “investigation”**), addresses the TRA regarding the following.

On the 7th 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.

The Proposal invites interested parties to submit questions or comments until **5 February 23:59 GMT**. By this letter, the Company submits its comments to the Proposal.

To begin with, the Company supports the exclusion of the hot rolled plate products 2500 mm wide and over from the description of the goods concerned. At the same time, the Company does not support further narrowing the scope of the goods concerned to narrower widths than 2500 mm. Although the Company can only produce goods concerned up to 2100 mm, the Company believes that widths up to 2499 mm are essential to prevent circumvention.

Firstly, the limitation of the goods concerned width for instance at 2101 mm, will allow South Korean producers to start supplying slightly wider plate to get past the tariffs and thereby significantly affect Spartan UK as a domestic producer. Thus, protecting up to 2499 mm avoids this possibility, without blocking supply of the next standard size of 2500mm wide. The Company believes this is necessary to avoid circumvention.

Moreover, 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, whereas supplying much wider plates to circumvent any measure is less likely to be financially attractive.

Secondly, the Company stresses that 2500 mm is the next quoted width of the South Korean producers' goods concerned. Thus, by limiting the goods concerned width by 2490 mm, the TRA will be both protecting domestic producers from the possibility of circumvention and allowing the overseas producers to supply the next size they quote above 2000 mm, that is 2500 mm.

Thus, the Company fully supports the Proposal and reserves the right to submit further comments in response of the positions of other interested parties.

Best regards¹,



Oleksandra Sandul

¹ The letter of authority was attached as appendix 009 to the confidential version of the Application on anti-dumping investigation against imports into the UK of hot-rolled steel plates with origin in South Korea.