

NON-CONFIDENTIAL

Trade Remedies Authority
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United Kingdom

Comments
of Spartan UK Limited to the Statement of the Intended Final Determination within the Tariff Rate
Quota Review of the Safeguard measure on certain steel products

I. TARIFF RATE QUOTA REVIEW

- 1.1. On 24 January 2026, the Trade Remedies Authority (**the “TRA”**) issued the Notice of an initiation of the Tariff Rate Quota Review (**the “TRQ Review”**) of the Safeguard measure on certain steel products, which are set out, inter alia, in Trade remedies notice 2025/12: safeguard measure: tariff-rate quota on steel goods¹ (**the “safeguard measure”**).
- 1.2. The TRQ Review covers specific categories of the steel products: metallic coated sheet classified under 7210 6100 20 and 7210 6900 80 commodity codes (**the “Category 4 products”**) and non-alloy and other alloy quarto plates classified under 7208 5191 00, 7208 5291 00, 7208 5198 00, 7208 5120 00 and 7208 5299 00 commodity codes (**the “Category 7 products”**).
- 1.3. On 13 February 2026, the TRA published the Statement of the Intended Final Determination (**the “SIFD”**) and instructed the interested parties to provide their comments by 23:59 UK time on 23 February 2026.
- 1.4. Thus, Spartan UK Limited (**the “Company”**), as a domestic producer of Category 7 products and duly registered interested party to the TRQ Review, submits these *Comments of Spartan UK Limited to the Statement of the Intended Final Determination within the Tariff Rate Quota Review of the Safeguard measure on certain steel products* (**the “Comments”**) based on reg. 29(2) of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (**the “TRA Regulation”**).

II. COMMENTS REGARDING THE SIFD

- 2.1. To begin with, the Company supports TRA’s intended final recommendation to maintain the tariff rate quota for Category 7 products. The Company agrees with the conclusions of the TRA that there is a UK production of the Category 7 products with over 2050mm width and less than 15mm thickness. The Company proved the parameters of its assortments with the invoices and bills of lading samples provided in Annex to the *Comments of Spartan UK Limited to documents of other interested parties to the Tariff Rate Quota Review of the Safeguard measure on certain steel products* (**the “Comments to application and registration documents”**). The Company also supports that the current allocation of the tariff rate quotas is appropriate for the domestic market conditions.
- 2.2. Meanwhile, the Company also wants to comment on the ISTA’s argument that “*welding or trimming material would lower the quality of the material such that it would no longer be fit-for-purpose in several end uses*” and the TRA’s conclusions that “*it is likely that there would be only limited competition between plate products produced in the UK which are less than 2050mm wide and imported plates that are over 2050mm wide*”. The Company believes that the TRA should also consider the scenario where larger plates, which are hypothetically exempt from duty, are used for profiling shapes instead of 2 m plates. 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 2.4 m plate, as appropriate in many cases. Thus, the economics of using a larger plate if it were duty-free may still be advantageous, and the competition between the Category 7 products produced in the UK, which are less than 2050 mm wide, and the imported Category 7 products plates that are over 2050 mm wide is not limited.
- 2.3. Moreover, the Company stresses that the fee for cutting is not usually as high as the ISTA submitted. [redacted] This can be proven by the invoice, which is provided in *Annex 1* to these *Comments*.

The data was redacted as it contains confidential information about the Company’s operation.

¹ <https://www.gov.uk/government/publications/trade-remedies-notices-tariff-rate-quotas-on-steel-goods/trade-remedies-notice-202512-safeguard-measure-tariff-rate-quota-on-steel-goods>

Annex 1 is not included in the non-confidential version of the Comments, as it contains confidential data about the Company's operations that cannot be disclosed to third parties.

- 2.4. Finally, the Company informs the TRA that the Company produces the Category 7 products to Class S flatness across all widths. To prove this point, the Company provides the relevant order documents in *Annex 2* to these *Comments*. Thus, the Company can meet a key technical requirement for Babcock.

Annex 2 is not included in the non-confidential version of the Comments, as it contains confidential data about the Company's operations that cannot be disclosed to third parties.

- 2.5. Therefore, the Company stresses that all of the requests of the interested parties to exclude certain goods from the scope of the safeguard measures are groundless and supports the intended conclusion of the TRA that the safeguard measures on Category 7 products should be maintained.
- 2.6. As the Company submitted in the *Comments to application and registration documents*, the safeguards measure has been effective since the Transition review of Safeguard measures on certain steel products No. TF0006 conducted in 2020-2021 (**the "Transition Review"**).² The Transition Review, inter alia, analysed whether there is a UK production of the various steel products subject to the safeguard measures to properly adjust the safeguard measures on steel products initially introduced by the European Union.
- 2.7. Following the Transition Review, the TRA recommended maintaining the safeguard measures for the Category 7 products³ with tariff rate quotas in place. Moreover, after the Transition Review, the measures have been reviewed several times with a different focus (developing countries exception review, extension review, tariff rate quota review)⁴. In none of those reviews, the TRA found that there is no UK production of the Category 7 products or that the scope of the Category 7 products is defined improperly.

III. THE NEED TO EXTEND THE SAFEGUARD MEASURES TO THE IMPORT OF CATEGORY 7 PRODUCTS FROM INDONESIA

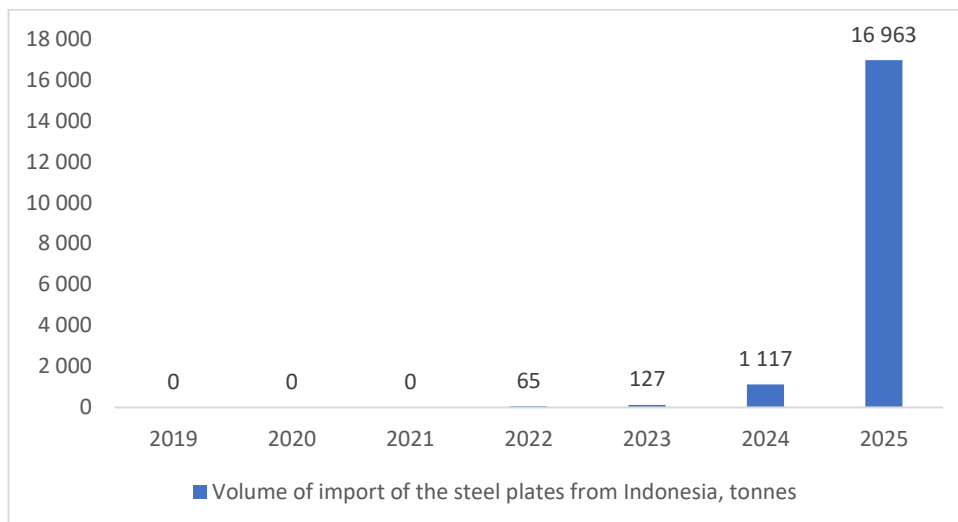
- 3.1. As the Company has already informed the TRA, the import volumes of the Category 7 products from Indonesia increased significantly in 2025. Moreover, the volumes of imports of the Category 7 products from Indonesia amounted to more than 4% of all imports of Category 7 products.

² <https://www.trade-remedies.service.gov.uk/public/case/TF0006/#public-file>

³ [TRA's Recommendation to the Secretary of State Transition review TF0006 – Safeguard measure on certain steel products; Report of Findings TRA Report of Findings to the Secretary of State as Directed Under Call-In of the Transition Review of Safeguard Measures on Certain Steel Products Reconsideration Case TF0006](#)

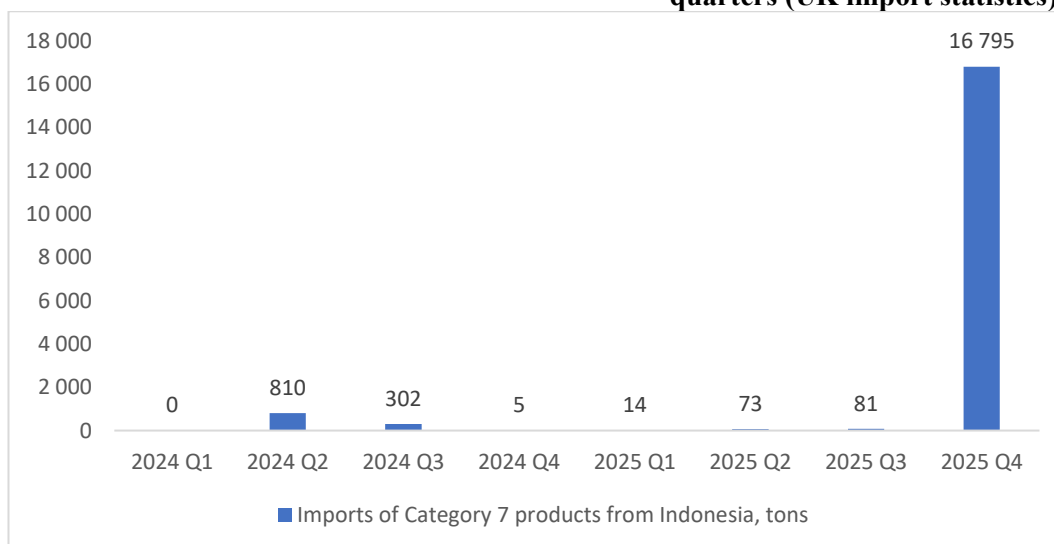
⁴ <https://www.trade-remedies.service.gov.uk/public/case/SM0016/>; <https://www.trade-remedies.service.gov.uk/public/case/SE0041/>

Diagram 1. Volume of import of the steel plates from Indonesia (UK import statistics), tonnes⁵



3.2. The Company realises that the sharp increase in import volumes of Category 7 products from Indonesia happened in Q4 of 2025. This has occurred because of the application of caps within the residual tariff rate quota to the Republic of Korea that has considerably limited Korean exports to the UK market. Moreover, in June 2025, the anti-dumping investigation AD0071: Hot-rolled steel plates exported from the Republic of Korea was initiated that has created additional risks for the further Korean exports to the UK through potential application of anti-dumping duties.

Diagram 2. Volume of import of the Category 7 products to the UK from Indonesia by quarters (UK import statistics), tonnes⁶



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Indicators	2019	2020	2021	2022	2023	2024	2025
Volume of import of the steel plates from Indonesia, tonnes	0	0	0	65	127	1 117	16 963
Dynamics relative to the base period, %	0	0	0	100%	195%	1718%	26097%

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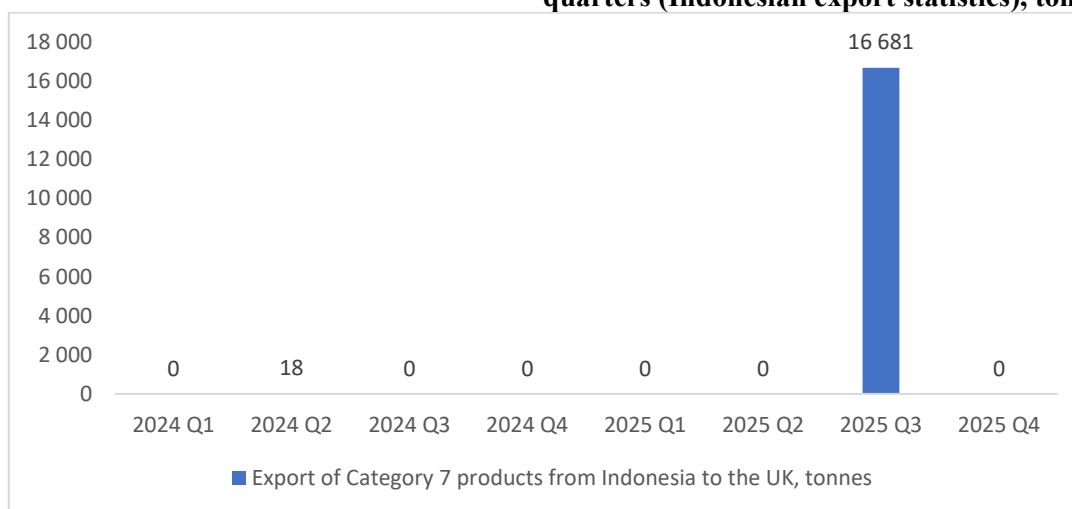
Indicators	2019	2020	2021	2022	2023	2024	2025
Volume of import of the steel plates from Indonesia, tonnes	0	0	0	65	127	1 117	16 963
Dynamics relative to the base period, %	0	0	0	100%	195%	1718%	26097%

3.3. The causal link between the introduction of the application of caps within the residual tariff rate quota and the increase in the sales of the Category 7 products can be supported by the data of the Indonesian export statistics taken from the ISSB (International Steel Statistics Bureau) (evidence is provided in *Annex 3*). The export of the Category 7 products took place in Q3 of 2025, which is immediately after the introduction of the country-specific caps, and which is within the period of review.

Annex 3 is not included in the non-confidential version of the Comments, as it contains confidential data from the paid resources that cannot be disclosed to third parties.

The volumes were accounted for Q4 of 2025 in the UK import statistics only because of the time allocated for logistics, while the sales were actually made in Q3 of 2025.

Diagram 3. Volume of export of the Category 7 products from Indonesia to the UK by quarters (Indonesian export statistics), tonnes⁷



3.4. Thus, even though this sharp increase falls outside of the scope of the period of review, it shows the most recent developments that have already occurred and proves the need to take action immediately to prevent negative consequences for the domestic industry. Firstly, the volumes of imports of the Category 7 products from Indonesia are clearly imminently to increase in the future. Secondly, the free access of imports from Indonesia to the UK market can hinder the application of the safeguard measures. Thirdly, the increase in imports has already affected domestic producers.

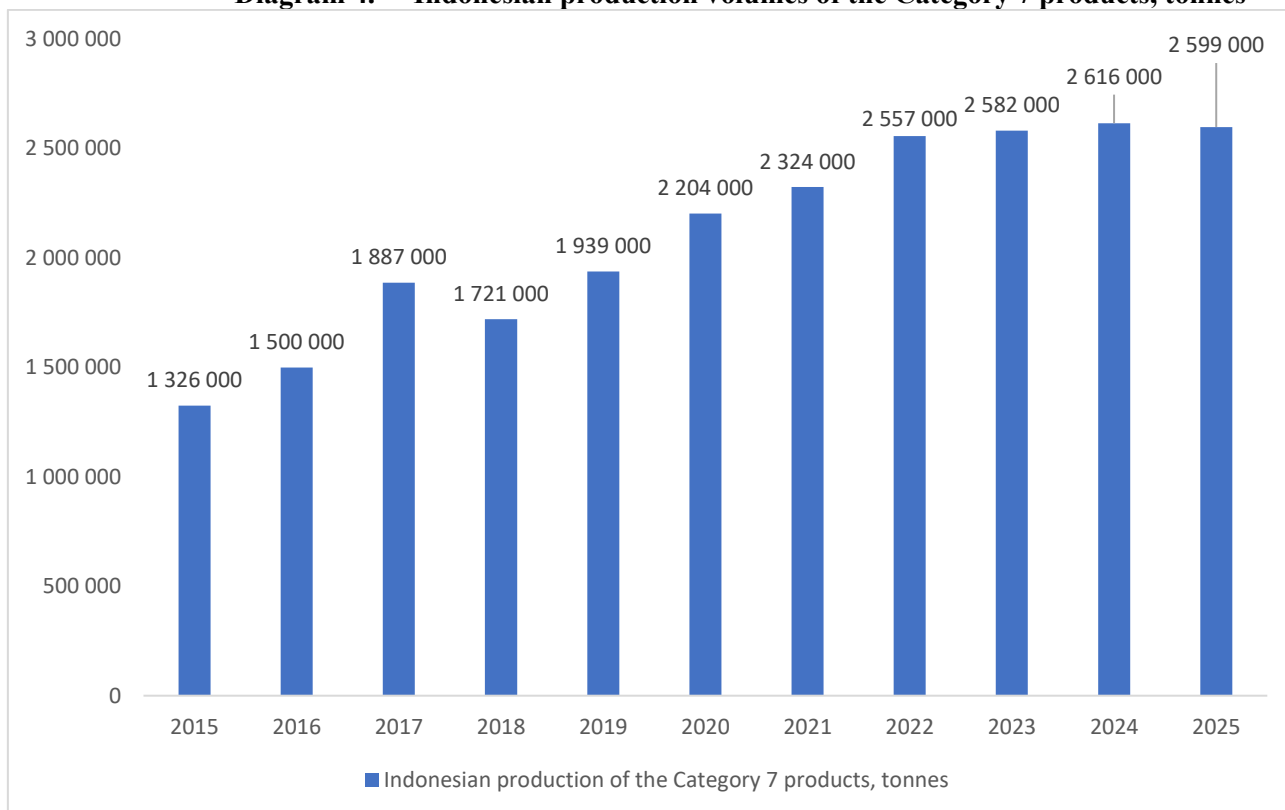
The clearly imminent further increase in the import volumes of Category 7 products from Indonesia

3.5. According to the data of the World Steel Association (evidence is provided in *Annex 3*), Indonesian production volumes of the Category 7 products have increased significantly over the last decade. The Indonesian production volumes of the Category 7 product in 2025 were almost twice as high as the Indonesian production volumes in 2015.

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Indicators	2019	2020	2021	2022	2023	2024	2025
Volume of import of the steel plates from Indonesia, tonnes	0	0	0	65	127	1 117	16 963
Dynamics relative to the base period, %	0	0	0	100%	195%	1718%	26097%

Diagram 4. Indonesian production volumes of the Category 7 products, tonnes⁸

3.6. Data from the Metal Expert database (evidence is provided in *Annex 3*) suggests that Indonesia has a vast production capacity of 5 560 000 tonnes of the Category 7 products. Meanwhile, even after the increase in Indonesian production volumes, the level of production capacities utilisation remained below 50%.

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Table 1. Indonesian production capacity utilisation, %

Indicators	2022	2023	2024	2025
Indonesian production of the Category 7 products, tonnes	2 557 000	2 582 000	2 616 000	2 599 000
Indonesian production capacities of the Category 7 products, tonnes	5 560 000	5 560 000	5 560 000	5 560 000
Indonesian production capacity utilisation, %	46%	46%	47%	47%

3.7. Moreover, according to the data of Metal Expert database (evidence is provided in *Annex 3*), there are also plans to increase the Indonesian production volumes even further. There are plans to launch another piece of equipment capable of producing 1 000 000 tonnes, while another piece of

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Indicators	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Indonesian production of the Category 7 products, tonnes	1 326 000	1 500 000	1 887 000	1 721 000	1 939 000	2 204 000	2 324 000	2 557 000	2 582 000	2 616 000	2 599 000
Dynamics relative to the base period, %	100%	113%	142%	130%	146%	166%	175%	193%	195%	197%	196%

equipment capable of producing 350 000 tonnes of the Category 7 products is currently being reconstructed and should also be re-launched soon.

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- 3.8. The Company also highlights that even with the current level of Indonesian production capacities, the amount of unused production capacities is much higher than the volumes of the UK consumption of the Category 7 products.

Diagram 5. Comparison of the volumes of the Indonesian unused production capacities of the Category 7 products and the volumes of the UK consumption of the Category 7 products, tonnes

Indicators	2022	2023	2024	2025
Indonesian unused production capacities of the Category 7 products, tonnes	3 003 000	2 978 000	2 944 000	2 961 000
Dynamics relative to the base period, %	100%	99%	98%	99%
UK consumption of the Category 7 products, tonnes	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics relative to the base period, %	100%	105%	93%	104%

The absolute indicators of the UK domestic consumption, 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.

- 3.9. Thus, the circumstances in the Indonesian market suggest that the import volumes of the Category 7 products from Indonesia to the UK can clearly imminently increase in the future and that the Indonesian import can fully flood the UK market.

The free access of the imports from Indonesia to the UK market can be used to circumvent the application of the safeguard measures

- 3.10. The sudden increase in the import volumes from Indonesia in the fourth quarter of 2025 can be traced, *inter alia*, to the restrictions that were introduced to the import of Category 7 products in June of 2025. This suggests that imports from Indonesia is used as a tool to overcome the country-specific cap applicable for such countries as the Republic of Korea.
- 3.11. POSCO, one of the largest producers of Category 7 products in the Republic of Korea, also has production facilities in Indonesia.⁹ According to the Metal Expert Capacity data database (evidence is provided in *Annex 3*), the production capacity of the POSCO Indonesian mill is around 1,5 million tonnes/year.

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- 3.12. Following the Tariff Rate Quota Review Case No. TQ0066, the country-specific cap was introduced for the use of the residual quota for the Category 7 products, which became effective on 1 July 2025. According to the SIFD, the Republic of Korea exhausted its country-specific cap in Q3 of 2025.

⁹ <https://www.krakatauposco.co.id/>; <https://www.krakatauposco.co.id/files/Product%20Catalogue/%5BR%20Rev1%5D%20-%202023%20Plate%20Product%20Catalogue.pdf>

- 3.13. Meanwhile, the limitation on imports from the Republic of Korea coincided with the sudden increase in imports of Category 7 products from Indonesia (the UK imports data was taken from the ISSB, evidence is provided in *Annex 3*).

Annex 3 is not included in the non-confidential version of the Comments, as it contains confidential data from the paid resources that cannot be disclosed to third parties.

Table 2. Comparison of Indonesian and Korean export volumes of the Category 7 products (the Indonesian and Korean export statistics), tonnes

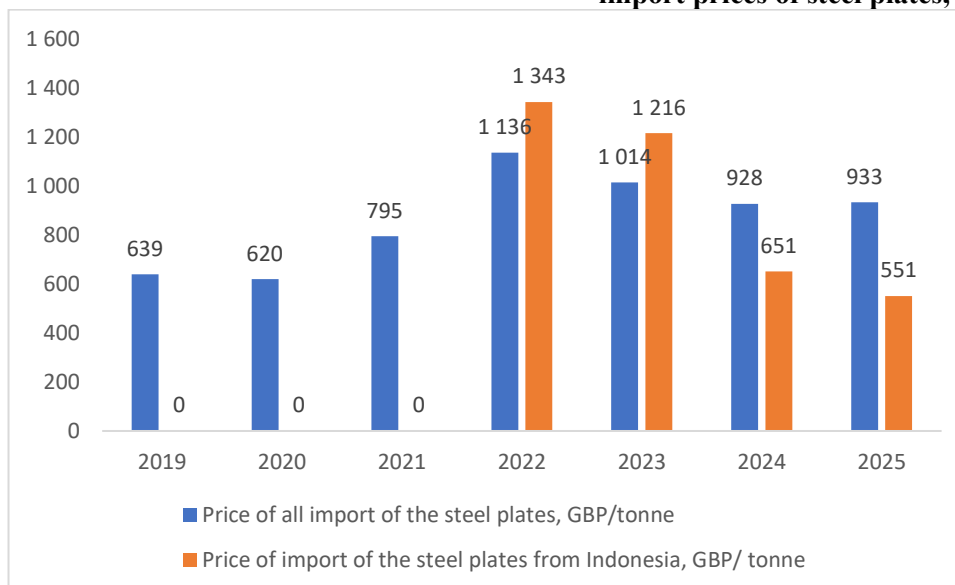
Indicators	2025 Q1	2025 Q2	2025 Q3	2025 Q4
Export of the Category 7 products from the Republic of Korea to the UK, tonnes	18 477	13 021	9 844	0
Export of the Category 7 products from Indonesia to the UK, tonnes	0	0	16 681	0

- 3.14. This suggests that the Korean producers, such as POSCO, have diversified their supply channels and started to supply Category 7 products from Indonesia, which is still enjoying the developing country exception. Combined with the fact that Indonesia has a stable production volume, a significant amount of the unused production capacities, and plans for launching new production facilities, the import volumes from Indonesia are clearly imminently to further increase in the future.

The injury caused to the Company

- 3.15. The import volumes from Indonesia have already started to aggravate the injury caused to the Company by the cheap imports from the Republic of Korea. The combined export volumes from Indonesia and the Republic of Korea destined to the UK market in Q3 of 2025 exceeded the export volumes destined to the UK market in Q1 of 2025, that is, before the introduction of the country-specific caps.
- 3.16. An additional factor that contributed to the Company's injury is that the import prices of the Indonesian import of the Category 7 products were lower than the average import prices of the Category 7 products.

Diagram 6. Comparison of the import prices of steel plates from Indonesia and the average import prices of steel plates, GBP/tonne¹⁰



3.17. As a result, the Company's sales of the Category 7 products to the UK market have dropped even further in 2025, reaching the lowest level over the last at least 7 years.

Diagram 7. The volumes of the Company's sales of the Category 7 products to the UK market, tonnes

Indicators	2019	2020	2021	2022	2023	2024	2025
Volume of the Company's sales to the UK market, tonnes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics relative to the base period, %	100%	97%	108%	79%	85%	80%	70%

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

3.18. Thus, the Company asks the TRA to recommend extending the safeguard measures on the Category 7 products to the imports of the Category 7 products by removing the Indonesian developing-country exception because of the increased import volumes of the Category 7 products from Indonesia in the structure of imports of the Category 7 products from all countries.

3.19. The change in the Indonesian import status will be justified for several reasons. Firstly, the current situation has already started to hinder the country-specific cap, which was introduced within the tariff rate quota for the Category 7 products. As the Company showed above, the sharp increase in import volumes of the Category 7 products from Indonesia coincided with the introduction of the country-specific cap on the import of Category 7 products from the Republic of Korea.

Secondly, the safeguard measures are currently introduced until 30 June 2026, and it will not be possible to conduct another review to amend the list of non-exception developing countries within this time frame.

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Indicators	2019	2020	2021	2022	2023	2024	2025
Price of import of the steel plates, GBP/tonne	639	620	795	1 136	1 014	928	933
Dynamics relative to the base period, %	100%	97%	124%	178%	159%	145%	146%
Price of import of the steel plates from Indonesia, GBP/ tonne	0	0	0	1 343	1 216	651	551
Dynamics relative to the base period, %	0	0	0	100%	91%	48%	41%

Thirdly, the domestic producers, such as the Company, are already suffering from the increased amount of imports of the Category 7 products from Indonesia. Therefore, the actions need to be taken now to prevent even further injury.

- 3.20. Thus, the Company asks the TRA to extend the scope of the TRQ Review to also look into the import volume from Indonesia, to add Indonesia to the list of developing countries non-exceptions, and extend the cap on the amount of imports coming from one country within the residual quota, introduced following the Tariff Rate Quota Review Case No. TQ0066, to Indonesia.