



International Steel Trade Association

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TO THE TRADE REMEDIES AUTHORITY

19th February 2026

REF REVIEW TQ0077

We write in the first instance with regard to Quarto Plate, also referred to as Hot rolled Plate and Reversing Mill Plate.

We are astonished by your conclusions and as you would expect, do not agree with them and urge you in the strongest terms to reverse your SIFD and uphold our request for discontinuation of HS Codes 7208519100, 7208529100, 7208519800, 7208512000, 7208529900 and 7208512010 from safeguarding regulations.

We are aware that as with all Trade Reviews, the TRA calls for data for the given period from all registered parties, be they importers, users or producers and will audit that data as necessary. In the case of producers this will be production and delivery data for the period and for the specific products under review.

Will you confirm that you have been provided with such product-specific data by each of the producers in question and have been able to audit same to your satisfaction ?

Under your point no. 69 and 70, we note in particular that TSUK have declared in their redacted document that they produce hot rolled plate under HS Codes 72085291, 72085120, 72085299 and 72085198 in their redacted Annex 2.

They further identify that they do not actually produce hot rolled plate under HS Code 7208 5191 but claim to have the technical capability to do so. Surely a technical capability to produce cannot be considered by the TRA for the purpose of this investigation.

In any case, to our knowledge, TSUK have not produced reversing mill plate since 2015.

They have the facility to produce hot rolled sheet, which is a totally different product to reversing mill plate.

Could it be possible that a document you have been presented with actually refers to hot rolled sheet and not reversing mill plate?

As per your point no. 71 and 72 Spartan UK have declared that they produce hot rolled plate under HS Codes

7208512010

7208512090

7208519810,

7208519890

So by their own admission, they do not produce hot rolled plate under HS Codes

7208519100

7208529100

7208529900

We ask if you have been provided with documentary evidence that Hot rolled plate has actually been produced in significant quantities of thicknesses below 15mm within the period under review?

Our market understanding is that whilst 15mm+ may be offered, thicknesses below 5mm are not.

We note that part of the submission from Spartan UK is the brochure of Metinvest. It is one thing to import and sell but completely another to actually produce.

Reference is also made here to investigation AD0071 where the TRA have revised the scope of their investigation to exclude any widths in excess of 2499mm.

Under Point no, 73-74, it is mentioned that Liberty Steel Dalzell Ltd can produce Category 7 products steel plates under HS Codes

7208 519100

7208 512000

7208 512010 so by their own admission, they are not producing steel plates under HS codes

7208 529100

7208 519800

7208 529900

As has been reported in The Guardian, The Steel Radar, The Chemical Engineer and by Scottish Government, Liberty Steel Dalzell Ltd, due to lack of available finance for raw materials, has not offered any steel production since May 2024 (prior to the POI). Financing of Liberty Steel was withdrawn by GFG Alliance in 2024 and Speciality Steel UK was put in to compulsory liquidation in August 2025.

Surely the TRA are not suggesting that this is a viable source of supply that imports will compete with?

Under Point 75 The TRA determines that there is sufficient evidence of category 7 goods production with over 2050mm width and less than 15mm thickness.

Whilst we must agree that Spartan have the capability to produce a maximum width of 2100mm, this will be a mill edge rather than a sheared edge which can cause problems during processing. Spartan can produce 12mm plate but prefer not to and there is no production below 12mm.

Even if the TRA have been able to obtain such detailed data then we would submit that the hypothetical rather than the actual is insufficient to justify your conclusions and would therefore request that you reconsider same.

Section F Conclusion and Recommendation.

Point 85 – The TRA have concluded that there has been a change in circumstances in accordance with regulation 35B9a of the safeguard regulations.

Point 86 – The TRA also found evidence of the TRQs impacting traditional trade flows of category 7 goods. Based on this evidence, they have concluded that there has been a change in circumstance in accordance with regulation 35B9e of the safeguard regulations.

Point 87 – it has been determined that there has been a change in circumstances since the application of the tariff rate quota in accordance with regulation 35b6b of the safeguard regulations.

Point 88 onwards is what astounds us.

We cannot agree with your conclusion.

There is TRQ for Europe then all other origins have to be imported under the residual quota TRQ which is restricted to 5080 mt per quarter. This is not a shippable quantity from many Far Eastern Origins and we find it hard to believe that the TRA can over simplify in this way and have not given the matter due consideration. The inference seems to be that Importers should buy their material from the EU which we do not feel the TRA are qualified to suggest.

Point 89. As the TRQ from the EU is constantly underutilised, contrary to your findings, we would suggest that for Category 7 the residual TRQ should be increased to 50,000 to enable a shippable quantity of 10k under the residual TRQ.

Point 91. As we have demonstrated above, for category 7 **THERE ARE NO LIKE PRODUCTS MANUFACTURED IN THE UK.** There are no widths over 2100 mm. There are no thicknesses below 15mm.

Sufficient evidence of lack of production in the UK has resulted in the revision of the TRA AD Case number AD0071 to be revised to exclude widths over 2499mm.

Point 94. The TRA state that they may recommend the removal of a commodity code from a TRQ only where there is sufficient evidence that UK producers have ceased production. As we have demonstrated above, in some cases there has never been production. For example, Category 7 plate over 2100mm.

We uphold our request that HS Codes 7208519100, 7208529100, 7208519800, 7208512000, 7208529900 and 7208512010 are removed from safeguarding restrictions.

At the very least, any widths in excess of 2100mm should be removed from safeguarding and the TRQ for the residual quota increased to 50,000 annually to allow for a capped quarterly shippable quantity TRQ of 10,000.

The safeguard regime is concerned with actual production and competitive supply, not theoretical or dormant capability. A mill's technical specification does not equate

to market availability. Production must be ongoing, commercially viable, supplied in meaningful volumes and available on reasonable lead times. In absence of these elements, imports cannot be said to compete with domestic production.

Also consider to add UK users of Category 7 goods rely on specific dimensions not available domestically. Maintaining restrictions increases costs, extends lead times, and reduces competitiveness of UK downstream industry. Safeguards are not intended to disadvantage domestic users where no competing UK production exists. This shows wider harm.

We stress the points we have made previously, to have the equipment to produce steel is quite different to actually producing it. As has been demonstrated by ourselves and many other interested parties in this case, certain REVERSING MILL PLATE products are simply not available from the domestic market and we urge the TRA to re-examine any statements to the contrary.

Yours faithfully

Simone Draper
Director
ISTA