

**Submission of the Korea Iron and Steel Association  
regarding Safeguard investigation concerning Dumping  
investigation into hot-rolled steel plate imported into the  
United Kingdom from the Republic of Korea**

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## **I. Introduction**

1. The Korea Iron and Steel Association ("KOSA") respectfully submits this response to the Statement of Essential Facts ("SEF") published on 23 April 2026 by the Trade Remedies Authority ("TRA") in connection with Investigation No. AD0071, concerning alleged dumping of hot-rolled steel plate ("HRP") originating from the Republic of Korea ("RoK").
2. KOSA understands that the TRA has presented two possible options in the SEF: (i) the Initial Proposal, under which anti-dumping duties would be imposed on the full scope of the goods concerned; and (ii) the Alternative Proposal, under which anti-dumping duties would apply only to goods with a width of less than 2,500mm.
3. This submission addresses the following substantive matters: the supply and demand of HRP in the UK market with particular reference to wide plate (2,100mm or more in width), the absence of domestic production of wide plate and its implications for the Economic Interest Test ("EIT"), and KOSA's support for the Alternative Proposal as the appropriate measure.

## **II. Supply and Demand Dynamics of Wide Plate in the UK Market**

### **2-1 Insufficient Domestic Supply of Wide Plate**

4. While a limited number of producers operate in the UK, domestic supply is demonstrably inadequate to meet downstream demand, particularly for wide plate products exceeding 2,100mm in width. Spartan UK, the sole applicant and a cooperating UK producer, has itself acknowledged that its production facilities are technically incapable of manufacturing HRP exceeding 2,100mm in width.
5. The other UK producers — Liberty Steel Dalzell and Tata Steel UK ("TSUK") — neither joined the application nor submitted questionnaire responses. KOSA submits that this absence of participation effectively indicates that those producers do not consider themselves to be materially injured by Korean HRP imports. Consequently, HRP exceeding 2,100mm in width is not produced in sufficient quantities in the UK to satisfy domestic demand, and UK downstream industries have no viable domestic alternative where UK producers must therefore rely on imports.

## **2-2 Korean Wide Plate Products Do Not Cause Injury to the UK Industry**

6. Korean exports of wide plate products to the United Kingdom are largely concentrated in products exceeding 2,500 mm in width. These products fall outside the production capability of Spartan UK and the other participating UK producers, and therefore do not compete directly with domestically produced HRP.
7. Korean wide plate exports serve a genuine and unmet supply need in the UK market. Rather than being a cause of injury to the UK domestic industry, they fill a supply gap that UK producers are structurally unable to address with their existing facilities. Accordingly, Korean HRP should be understood as an essential complementary input — not as a competing product — and should not be treated as a direct cause of injury to the UK industry.
8. Maintaining the full scope of the measure by including products exceeding 2,500mm in width would risk restricting access to goods that are not sufficiently available from UK producers. Such an approach would not remedy injury to the UK industry; it would instead impose unnecessary additional costs on downstream users that rely on stable access to such HRP imports.

## **III. Importance of Wide Plate for UK Downstream Industries**

### **3-1 Strategic Importance of Wide Plate to Key UK Industries**

9. Wide plate HRP (2,100mm or more in width) is an essential input material for several strategically important UK industries, including large structural construction and civil engineering, shipbuilding, offshore structures and marine engineering, and offshore wind turbine and towers. These applications demand specific dimensional and structural characteristics that products less than 2,500mm in width cannot fulfil, making products exceeding 2,500mm in width a non-discretionary input for the UK's core manufacturing and infrastructure supply chains.

### **3-2 Adverse Impact on the UK's Clean Energy Policy**

10. KOSA draws particular attention to the UK government's 'Clean Power by 2030' target, to which offshore wind energy generation is central. The construction of wind turbine towers

and monopile foundations requires wide plate HRP, and wider plates are specifically preferred in such structures to minimise weld joints and reduce fatigue failure risk

11. The imposition of anti-dumping duties on wide plate HRP would directly increase the cost of constructing offshore wind infrastructure in the UK. This would raise the cost of achieving the UK's clean energy targets, reduce the viability of offshore wind investment, and undermine the UK government's own energy security and decarbonisation policy goals.

### **3-3 Risk of Supply Disruption and Increased Procurement Costs**

12. UK downstream demand for wide plate HRP has been growing, driven by expanding activity in offshore wind, shipbuilding, and large-scale structural fabrication. If Korean supply is curtailed by the imposition of duties on wide plate products, UK downstream manufacturers will not only face a narrowing of available supply sources, given the limited number of alternative international producers capable of supplying wide plate HRP at competitive prices, but also increased material procurement costs, which will be passed through to end products and projects.
13. Korean wide plate HRP account for a significant portion of Korea's HRP exports to the UK and are used for specialised applications. Any supply shortfall or prolonged delay in sourcing wide plate at competitive prices could give rise to delays and cost overruns across a range of projects. A reduction in Korean supply would therefore likely have a material adverse impact on UK downstream industries.

## **IV. The Alternative Proposal Better Satisfies the Economic Interest Test**

14. KOSA acknowledges the TRA's finding that the Initial Proposal — covering all HRP imported from Korea regardless of width — does not meet the Economic Interest Test (EIT), and concurs with this finding for the reasons set out above. KOSA therefore supports the Alternative Proposal, which limits the application of the anti-dumping measure to HRP less than 2,500mm in width.
15. The Initial Proposal, which would impose duties on the full scope of the goods concerned, would unnecessarily cover products for which the UK market faces supply limitations. Such an approach would increase costs for UK users, reduce supply flexibility, and undermine the competitiveness of industries that rely on wide plate products.

16. By contrast, the Alternative Proposal would limit the measure to products below 2,500 mm in width. This approach is supported by the TRA's own analysis of overseas producers' sales transactions, which found that 92% of sales transactions involved widths divisible by 500mm, such as 1,500mm, 2,000mm and 2,500mm. In that context, and given the absence of a formal definition of wide plates, 2,500mm represents a clear and commercially meaningful threshold. Limiting the measure to HRP below 2,500 mm in width is therefore both well-reasoned and analytically sound.

## **V. Conclusion**

17. KOSA recognises the importance of fair and transparent trade remedy procedures and respects the TRA's conduct of this investigation. At the same time, KOSA respectfully submits that any definitive measure should be carefully calibrated to avoid disrupting the supply of essential materials to UK downstream industries
18. The Initial Proposal, which covers the full scope of HRP imports from Korea, would impose anti-dumping duties on wide plate products that are not produced in the UK and do not compete with UK domestic production. Such an approach would be disproportionate and contrary to the economic interest of the UK.
19. By contrast, the Alternative Proposal, which is limited to HRP less than 2,500mm wide, appropriately targets the product segment in which Korean imports may compete with UK producers, while preserving the stable supply of wide plate to strategically important UK industries. KOSA therefore respectfully supports the TRA's preferred option, namely the Alternative Proposal, and requests that the definitive measure should be limited to goods concerned with a width of less than 2,500 mm.
20. KOSA also remains committed to constructive engagement with the TRA and stands ready to provide any further information that may assist the Authority in reaching a fair, reasonable, and proportionate final determination.