

NON-CONFIDENTIAL

Trade Remedies Authority
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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

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. The TRQ Review was initiated based on the International Steel Trade Association’s (**the “ISTA”**) Application for a Tariff rate Quota review on safeguarding on Quarto Plate otherwise referred to as Hot Rolled plate or Reversing Mill Plate dated 9 December 2025 (**the “Application regarding Category 7 products”**), ISTA’s *Request Tariff Rate Quota Review for Safeguard Measures on Aluzinc – Tariff Heading 7210610020 and Aluminised Steel Products – Tariff Heading 7210690080 dated 12 November 2025* (**the “Application regarding Category 4 products”**),” and Babcock International Group’s Application regarding Tariff Rate Quota Review – Commodity Code 7208 5120 00 (**the “Application regarding code 7208 5120 00”**).
- 1.4. As of 13 February 2026, the TRA published responses to the registration of interest form of the following companies:
 - LIBERTY STEEL DALZELL LTD (domestic producer);
 - TATA STEEL UK LIMITED (domestic producer);
 - B.A. STEELS LIMITED (importer);
 - BABCOCK INTERNATIONAL GROUP PLC (importer);
 - BELMONT & KNOTT LTD (importer);
 - DUFERCO UK LIMITED (importer);
 - HI-TECH STEEL SERVICES LIMITED (importer);
 - SALZGITTER MANNESMANN UK LIMITED (importer);
 - TARGET STEEL LTD (importer);
 - Sebden Steel Service Centres Ltd (importer);
 - SSAB SWEDISH STEEL LIMITED (importer);
 - STEMCOR DISTRIBUTION LIMITED (importer);
 - TOP TUBES LIMITED (importer);
 - STEEL & ALLOY PROCESSING LIMITED (importer);
 - C.J. UPTON & SONS LIMITED (importer);
 - BROWN MCFARLANE LIMITED (importer);
 - NAM KIM STEEL JOINT STOCK COMPANY (exporter);
 - Hoa Sen Group (exporter);
 - CHINA STEEL CORP. (TAIWAN) (exporter);
 - POSCO (exporter);

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>

- Pomina Flat Steel Joint Stock Company (exporter);
- TVP STEEL TRADING JOINT STOCK COMPANY (exporter);
- HPSS (overseas producer);
- POSCOSTEELEON (overseas producer);
- TVP STEEL JOINT STOCK COMPANY (overseas producer);
- Ton Dong A Corporation (exporter);
- Government of Malaysia (GOM) (foreign government);
- Government of the Republic of Korea (foreign government);
- Ministry of Commerce, India (foreign government);
- Trade Remedies Authority of Viet Nam (foreign government);
- The Ministry of Trade of Republic of Türkiye (foreign government);
- Korea Iron and Steel Association (KOSA) (trade body);
- EEF LIMITED (trade body);

(hereunder referred to together as the “Interested parties”).

- 1.5. 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 documents submitted by other Interested parties (the “Comments”)* based on sch. para. 9 of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (**the “TRA Regulation”**).

II. COMMENTS REGARDING THE POSITION OF OTHER INTERESTED PARTIES

General comments regarding the product scope of the safeguard measures

- 2.1. To begin with, the Company stresses that all the comments of the Interested parties regarding the absence of the UK production of the Category 7 products fall short. 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.
- 2.2. 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.
- 2.3. The Company has been steadily supplying Category 7 products to the UK market throughout 2019-2025.

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. 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.

2.4. Thus, the Company is certain that all of the arguments about the absence of the UK production or regarding the scope of the Category 7 products are ungrounded and should be dismissed.

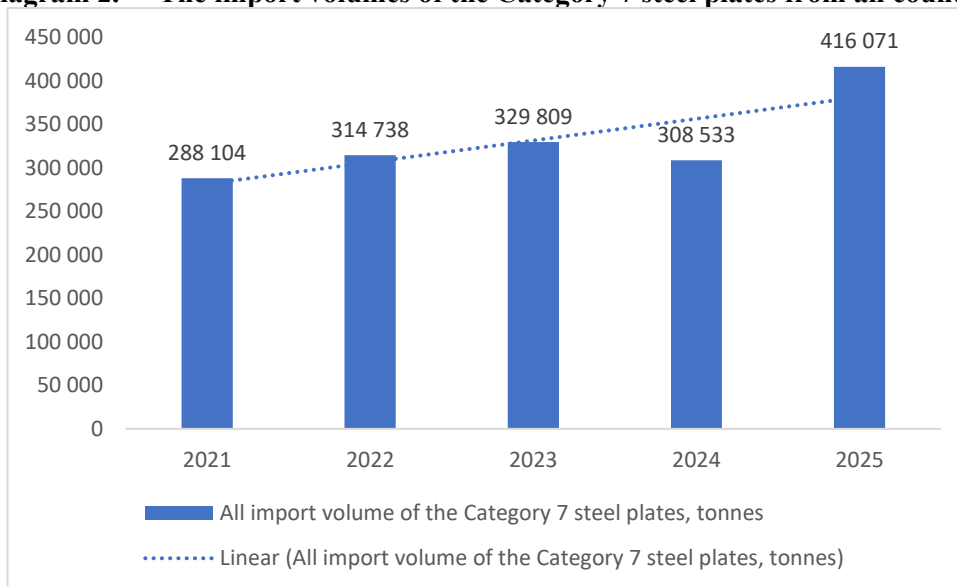
Comments regarding the gravity of the safeguard measures

2.5. The other Interested parties have repeatedly argued that the safeguard measures are too restrictive, and that the tariff quotas mechanism is too burdensome, creating additional obstacles and unpredictability.

2.6. The Company would like to highlight that tariff rate quotas are a popular means of trade regulation that is actively being used by the states around the world. Only in 2025, 412 examples of tariff rate quotas were implemented by the WTO Members.⁵ The UK operates quotas on a non-discriminatory basis. The quotas are apportioned to particular foreign countries or territories and allocated to the UK importers on a first-come, first-served basis.

2.7. Moreover, even the import volumes of the Category 7 products demonstrate the increase throughout the period of the UK’s tariff quotas application, which proves that the safeguard measures are not overly restrictive.

Diagram 2. The import volumes of the Category 7 steel plates from all countries, tonnes⁶



⁵ <https://agims.wto.org/en/TariffandOtherQuotas/ViewResults>

Indicators	2021	2022	2023	2024	2025
All import volume of the Category 7 steel plates, tonnes	288 104	314 738	329 809	308 533	416 071
Dynamics relative to the base period, %	100%	109%	114%	107%	144%

Response to other comments of the Interested parties

- 2.8. The Company also stresses that the Interested parties repeatedly wrongfully present the information on numerous issues, including the UK products assortment, the volumes of import etc. In the table below, the Company provides a response to those comments of the Interested parties.

Table 1. Response to certain comments of the Interested parties

Interested parties' comments	Spartan's comments	Evidences
<p>ISTA in the Application (p. 2): <i>"Quarto Plate which is in excess of 2050mm in width and between 4.75mm and 15mm in thickness must be imported"</i></p>	<p>The Company produces Category 7 products [redacted]</p>	<p><i>The Annex was redacted as it contains documents that constitute the Company's confidential information, which cannot be disclosed to third parties.</i></p>
<p>ISTA in the Application (p. 5-6): <i>"Widths in excess of 2050mm will not be imported and cut to widths that will compete with widths that are produced in the UK – ie maximum 1500mm."</i></p>	<p><i>The data was redacted as it contains confidential information about the Company's operation.</i></p>	
<p>ISTA in the Application (p. 7): <i>"Spartan UK do not produce material which is over 2050mm in width nor below 15mm."</i></p>		
<p>Government of the Republic of Korea in its registration form: <i>"A significant portion of the products subject to the present TRQ review are either not produced in the UK or are available domestically only to a negligible extent. Consequently, excluding these products from the safeguard measure poses no risk of material injury to UK producers of like or directly competitive goods, as there is effectively no domestic industry to protect."</i></p>		
<p>Government of the Republic of Korea in its registration form: <i>"Notably, in the Anti-Dumping Investigation AD0071 (Hot-rolled steel plate from South Korea), plate products exceeding 2,050 mm in width were explicitly excluded from the scope of the investigation. This exclusion served as an official acknowledgment that such products are not produced by the UK industry."</i></p>		

<p>ISTA in the Application (p. 7):</p> <p><i>“Until new safeguarding restrictions were put in place on 1st July 2025 Importers had been able to import sufficient quantities of quarto plate which are in excess of 2050mm wide and below 15mm in thickness which are not produced in the UK.”</i></p>	<p>The importers were also actively importing Category 7 products, which are 2000 mm-wide and are produced by the Company. Those Category 7 products were imported at a lower price than the UK products and significantly distorted the market, creating the need for the anti-dumping investigation, which was initiated by the Company.</p>	
<p>ISTA in the Application (p. 7):</p> <p><i>“When the transition review TF0006 was undertaken in 2021, the TRA or TRID’s own investigation led them to recommend that category M or 7 should not be considered under the safeguarding review as there was no likelihood of serious injury to domestic producers. Subsequently, this recommendation was overruled, for reasons that are not clear to us and category M or 7 was introduced under safeguarding.”</i></p>	<p>The conclusion regarding the low likelihood of serious injury to domestic producers was initially reached by the TRA due to a lack of authenticated data on which to base an assessment. Thus, the TRA did not make an actual assessment of the matter during the initial Transition Review, while the TRA took into account all available data on the reconciliation stage. Therefore, reference to the findings that were lawfully overruled is a mere manipulation.</p>	<p>Section 1.4.6 (including the footnotes) and section 2.3.3 of the 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.</p>
<p>STEMCOR DISTRIBUTION LIMITED in its registration form:</p> <p><i>“Injury to the UK industry is unlikely, as neither the residual quota (under which imports from countries such as South Korea are allocated) nor the relevant European quotas have historically been fully utilised. This indicates that there has been no oversupply of imports into the UK market and, consequently, that UK producers have not been subject to market distortion or displacement by low-priced imports.”</i></p>	<p>The imports of Category 7 products from countries, including South Korea, experienced a significant increase during some periods (for instance, the first half of 2025). This specifically injured the Company as a domestic producer and dictated the need for the anti-dumping investigation, which was initiated by the Company.</p>	

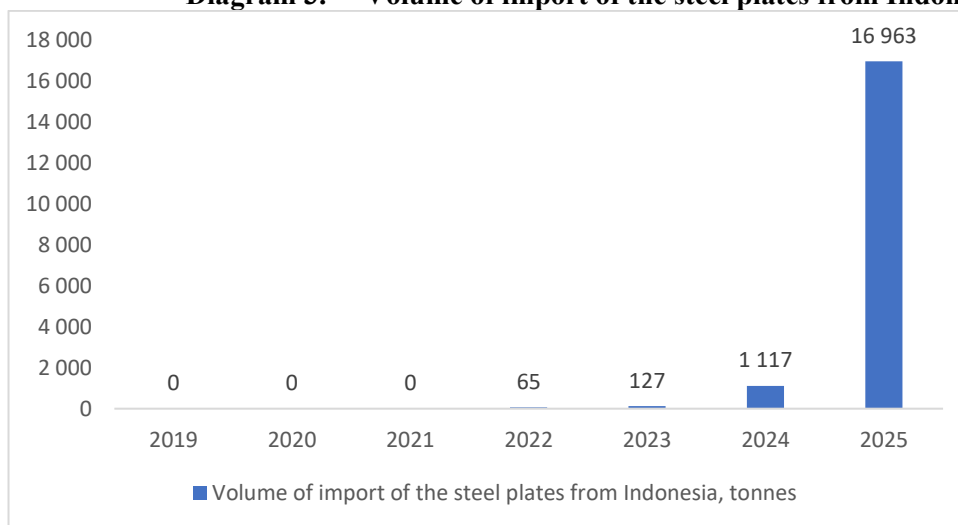
III. INCREASE OF IMPORT VOLUMES OF CATEGORY 7 PRODUCTS FROM SOME COUNTRIES

- 3.1. The Company points out that import volumes of Category 7 products from some countries have significantly increased over the last few years, causing injury to the domestic producers of the Category 7 products.

Increase in import volumes from Indonesia

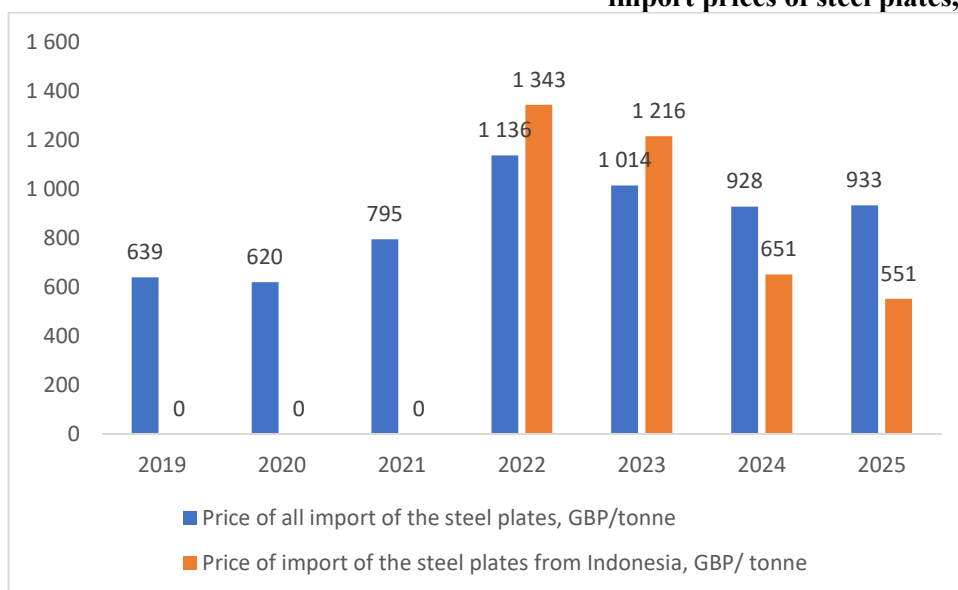
3.2. The Company observed the sharp and significant increase in import volumes of Category 7 products from Indonesia. The import volumes of Category 7 products from Indonesia in 2025 increased by 1419% compared to the volumes of 2024 and by 25997% compared to the volumes of 2022.

Diagram 3. Volume of import of the steel plates from Indonesia, tonnes⁷



3.3. Meanwhile, the price of the import of Category 7 products from Indonesia was much lower than the average import prices in both 2024 and 2025. Moreover, the import prices from Indonesia have been decreasing since 2022, dropping by 59%.

Diagram 4. Comparison of the import prices of steel plates from Indonesia and the average import prices of steel plates, GBP/tonne⁸



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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
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%

- 3.4. The shares of the import of Category 7 products from Indonesia in all import volumes of Category 7 products increased to around 4%. Therefore, the volumes of imports from Indonesia exceeded the limit of 3% set in reg. 43(1) of the TRA Regulation, and Indonesia should no longer be qualified for the developing country exemptions from the safeguard measures.

Table 2. Share of import volumes of steel plates from Indonesia in all import volumes, %

Indicators	2022	2023	2024	2025
All import volume of the steel plates, tonnes	314 738	329 809	308 533	416 071
Dynamics relative to the base period, %	100%	105%	98%	132%
Volume of import of the steel plates from Indonesia, tonnes	65	127	1 117	16 963
Dynamics relative to the base period, %	100%	195%	1718%	26097%
Share of import volumes of steel plates from Indonesia in all import volumes, %	0,02%	0,04%	0,36%	4,08%
Dynamics relative to the base period, %	100%	186%	1753%	19741%

- 3.5. The Company stresses that the Indonesian import of Category 7 products' presence on the UK market became more visible. In 2025, the Indonesian import of Category 7 products' share in the UK domestic consumption increased from [redacted].

Table 3. Share of import volumes of steel plates from Indonesia in the UK consumption, %

Indicators	2022	2023	2024	2025
UK domestic consumption of the Category 7 products, tonnes	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics relative to the base period, %	100%	105%	93%	104%
Volume of import of the steel plates from Indonesia, tonnes	65	127	1 117	16 963
Dynamics relative to the base period, %	100%	195%	1718%	26097%
Share of imports from Indonesia in the UK consumption, %	[redacted]	[redacted]	[redacted]	[redacted]
Dynamics relative to the base period, %	100%	187%	1846%	25055%

The absolute indicators of the UK domestic consumption and Share of imports from Indonesia in the UK 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.

- 3.6. 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.

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%