



International Steel Trade Association

3rd Floor, Ironmongers' Hall,
Shaftesbury Place
London EC2Y 8AA
Tel 07534 790485

Email Simone.draper@ista-steel.com

TO THE TRADE REMEDIES AUTHORITY

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REF Anti Dumping Investigation AD0071

It was with regret that we noted that the TRA have taken the decision not to exclude widths over 2499mm from their investigation and we hope it is not too late to reverse this decision.

We find it quite incredible that the TRA seem to have changed their minds about revising the review purely on the 'evidence' provided by Liberty Dalzell, a mill who have not been offering Hot rolled plate to the domestic market since May 2024. This, despite having received three responses to the proposed revised scope of the review, one of which was from the applicant, all in favour of the revision. One would expect that all other interested parties in the case would also support the revision as they did not respond to the contrary.

Furthermore, Liberty Dalzell did not even participate in the original review and did not register their interest in the case within the time frame given. It would therefore be reasonable to suppose that they were not adversely affected by imports from Korea. Conversely, they now make a claim that they would be affected by imports of Korean origin plate over 2499mm wide, apparently supported by redacted data about their production of such product within the Period of Interest.

Whilst we cannot comment on data which we are unable to verify, it is an obvious conclusion that if Liberty Dalzell did not deem Korean imports to be damaging their business for the product group as a whole, then they can have no grounds to now claim that a specific part of that group is a concern.

This is surely insufficient grounds upon which to base your decision.

Considering the extensive amount of time and work that all interested parties in this review have taken to establish that plate in excess of 2499mm is not produced in the UK, it is beyond frustrating and demoralising to see the findings of the review outcome and the 'facts' upon which they are based.

If the TRA have the desire to continue engaging for this and any future investigations, with the downstream steel industry, employing in the region of 300,000 people who manufacture products made from steel, we call upon them to restore some faith in the system and reconsider the outcome of their review to revise the scope of AD0071.

Yours faithfully

Simone Draper
Director
ISTA