



# Registration form for interested parties and contributors

Case No.: AD0071

Dumping investigation

Hot-rolled steel plate originating in The Republic of Korea

Completed on behalf of (provide the name of your business or organisation):	<b>STEMCOR DISTRIBUTION LIMITED</b>
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## Note:

Please provide **two copies of your response to this form**: a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

When you have completed each form, indicate the **confidentiality** status of the document by placing an  in the relevant box below and in the header of the form. We strongly recommend this questionnaire be completed on a computer, so this step is easy to complete.

- Confidential
- Non-confidential (will be made available on the public file:  
<https://www.trade-remedies.service.gov.uk/public/cases/>)

Deadline for response:	23 June 2025
Case team contact:	AD0071@traderemedies.gov.uk



## Introduction

### Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation **by completing the relevant sections** as indicated in this form **and submitting the completed form** using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

An interested party is either:

- a government of the foreign country or territory subject to the investigation;
- an overseas exporter, an overseas producer or an importer of the goods subject to the investigation;
- a UK producer of goods that are like the goods subject to the investigation; or
- a trade or business association representing one or more of the above parties.

A contributor is a person or organisation who is not an interested party but who wants to register so that they can participate in an investigation.

### Scope of the investigation

Goods concerned	<p>Hot-rolled steel plate originating in The Republic of Korea described as:</p> <ul style="list-style-type: none"> <li>• Flat-rolled products of iron or non-alloy steel, of a width of 600mm or more, hot-rolled, not clad, plated or coated, not in coils; not further worked than hot-rolled, of a thickness exceeding 4.75mm, excluding tool steel. Including perforated or not further worked than surface-treated or simply cut into shapes other than rectangular; and/or</li> <li>• Flat-rolled products of iron or non-alloy steel, of a width of 600mm or more, clad; and/or</li> <li>• Flat-rolled products of other alloy steel, of a width of 600mm or more, not further worked than hot-rolled, not in coils, of a thickness of 4.75 mm or more.</li> </ul> <p>These hot-rolled steel plate products are currently classifiable within the following commodity codes (CN codes):</p> <p>72085120, 72085191, 72085198, 72085210, 72085299, 72085291, 72089020, 72089080, 72109030, 72254040, 72254060.</p>
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Period of investigation (POI)	1 April 2024 to 31 March 2025
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For further details, please refer to the Notice of Initiation on the public file:  
<https://www.trade-remedies.service.gov.uk/public/cases/>.

## Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by 23 June 2025, 23:59 GMT using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures. Please see the [TRA's public guidance](#) for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

## Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation, or a UK producer of goods that are like the goods subject to the investigation, we will ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.



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If your business is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

Sampled overseas exporters will have an individual margin calculated for their business. If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your business may be deemed not to have cooperated in the investigation. The TRA may base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your business than if it had cooperated.

If we decide to sample overseas exporters, and your business is not selected for this sample, you may submit a request to us to calculate individual margins for your business. We may accept your request providing that:

- you submit the required information on time; and
- the number of exporters subject to examination is not so large that complying with the request would be unduly burdensome and risk preventing the timely completion of the investigation



## Section A: About your business or organisation

### A1. Your business' or organisation's activities

1. To determine your business' or organisation's role for the purpose of this investigation, please select all the following options that are applicable to your business or organisation. Please refer to the POI defined on page 2.

[A1.1] During the POI, we produced the goods concerned in The Republic of Korea

**Note: Please complete sections A2 and B.**

[A1.2] During the POI, we directly exported the goods concerned from The Republic of Korea to the UK.

**Note: Please complete sections A3 and B.**

[A1.3] During the POI, we indirectly exported the goods concerned from The Republic of Korea to the UK via a third party (located either in The Republic of Korea or a third country not subject to the investigation).

**Note: Please complete sections A3 and B.**

[A1.4] During the POI, we imported the goods concerned originating in The Republic of Korea to the UK.

**Note: Please complete sections A4 and B.**

[A1.5] During the POI, we produced goods that are like the goods concerned in the UK.

**Note: Please complete sections A5 and B.**

[A1.6] Other.

**Note: Please complete section B.**

2. If you selected 'Other' [A1.6], please describe the activity/activities of your business or organisation and your business' or organisation's interest in this investigation in the field below.



## A2. Production and domestic sales of the goods concerned

Complete this section if you indicated under A1 that **you are a producer of the goods concerned in The Republic of Korea.**

3. Please refer to the description of the goods concerned on page 2. In the field below, describe the goods that you produce and that fall within the description, including the corresponding commodity code if relevant.

4. Please provide your business' total production volumes and production capacity for the goods concerned during the period POI in the table below.

Total production volume of the goods concerned (POI) [tonnes]	
Total production capacity of the goods concerned (POI) [tonnes]	

Consider providing these figures in ranges in your non-confidential version of this form.

5. Please give details of all associated parties involved with the business in the production and sales (export and/or domestic) of the goods concerned during the POI. Both natural persons (individuals) and legal persons (e.g., companies) are considered to be associated where they meet the definition of 'Related Persons' in Regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018.

Company/Person name	Location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

6. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your business during the POI in the table below.

Total domestic sales volume of the goods concerned (POI) [tonnes]	
Total domestic sales value of the goods concerned (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.



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7. In terms of costs, are there any inputs in your production process that fluctuate? If so, can you please explain the extent of fluctuations and drivers (eg. Commodity price fluctuations) and the materiality of the input for cost production.



### A3. Direct and indirect exports of the goods concerned

Complete this section if you indicated under A1 that you are an exporter of the goods concerned from The Republic of Korea.

8. If you are not the producer of the goods concerned that you export to the UK, please provide details of your suppliers of the goods concerned and indicate whether these are the producers of the goods concerned in the table below.

Company name	Company location (city, country)	Relationship	Producer (Y/N)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

9. Please provide the total of your direct and indirect export volumes and export values of the goods concerned to the UK during POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your business), which is located in The Republic of Korea or a third country, are to be considered indirect exports.

Total direct export volume (POI) [tonnes]	
Total indirect export volume (POI) [tonnes]	
Total direct export value (POI) [£]	
Total indirect export value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

10. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

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11. Please provide details of the commodity code(s) under which you export the goods concerned to the UK in the box below.



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## A4. UK imports of the goods concerned

Complete this section if you indicated under A1 that you are an importer of the goods concerned from the Republic of Korea.

12. Please provide the total of your import volumes and import values of the goods concerned originating in/exported from The Republic of Korea to the UK during the POI in the table below.

Total import volume (POI) [tonnes]	18 - 22K MT
Total import value (POI) [£]	£10 - 12M

Consider providing these figures in ranges in your non-confidential version of this form.

13. Please provide details for your suppliers of the goods concerned originating in The Republic of Korea in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship
WE SOURCE THESE MATERIALS FROM [REDACTED – COMMERCIAL SENSITIVE INFORMATION]	SEOUL, SOUTH KOREA	[REDACTED – COMMERCIAL SENSITIVE INFORMATION]	[REDACTED – COMMERCIAL SENSITIVE INFORMATION]

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

14. Please specify the purpose of the goods concerned that you are importing from The Republic of Korea. Select **all** of the following options that are applicable to your business or organisation.

- We resell the goods unchanged to distributors or final customers.
- We process the goods before reselling them to distributors or final customers.



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- We use the goods as input in our production of \_\_\_\_\_ . (specify the product/s).
- Other.

15. If you selected 'Other', please specify the purpose of the goods concerned that you are importing from The Republic of Korea in the field below.

16. Please describe how the goods concerned compare to UK-produced like goods in the field below.

There is currently only limited production capacity for hot-rolled plate in the United Kingdom. Specifically:

- Spartan UK has a maximum production width of 2100mm and therefore cannot manufacture wider plate required for numerous specialist applications.
- Liberty Steel, the only other domestic producer, is presently not manufacturing due to lack of feedstock, finance and competitive structure.

As a result, the domestic industry does not adequately supply the full range of hot-rolled plate products required by the UK market.

Upon internal review of our orders placed during the investigation period, we find that only 33.56% fall within the scope of Spartan UK's current production capacity. The majority of our imports (66.44%) is for wider plate which cannot be met by UK producers. Consequently, the large supply of South Korean imports falls outside of Spartan's current production capacity and therefore unlikely to have caused any significant injury.

## A5. Production and sales of goods produced in the UK that are like the goods concerned

**Complete this section if you indicated under A1 that you are a producer in the United Kingdom of goods that are like the goods concerned.**

17. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned.



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18. Please provide your business' total production volumes and production capacity for UK production of goods that are like the goods concerned during **the injury period (IP) which is 1 April 2021 to the 31 March 2024 and POI (1 April 2024 – 31 March 2025)** in the table below.

	Apr 2021/Mar 2022	Apr 2022/Mar 2023	Apr 2023/Mar 2024	POI
Total production volume [tonnes]				
Total production capacity [tonnes]				

Consider providing these figures in ranges in your non-confidential version of this form.

19. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods concerned produced by your business in the UK during the IP and the POI in the table below.

	2021/2022	2022/2023	2023/2024	2024/2025
Total domestic sales volume of the like goods [tonnes]				
Total domestic sales value of the like goods [£]				
Total export sales volume of the like goods [tonnes]				
Total export sales value of the like goods [£]				

Consider providing these figures in ranges in your non-confidential version of this form.

20. Please provide the total employee and wage figures for the IP and POI:



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	2021/2022	2022/2023	2023/2024	2024/2025
Total number of employees				
Number of employees for all like goods				
Hourly mean wage for full time employees engaged in activities related to the like goods (£)				

21. In the field below, please provide any other comments or evidence related to injury you believe you company is suffering as a result of alleged dumped imports of the goods concerned into the UK from the Republic of Korea. This can relate to the prices, volumes and/or profits associated with your business, in the context of the goods concerned or goods that are like the goods concerned.



## Section B: Additional information

### B1. Other interested parties

22. If you believe there are other interested parties that should register an interest in this case, please provide their business' or organisation's name and website details below.

Name	Website

Add additional rows as required

### B2. Scope

23. We welcome commentary and feedback on the commodity codes provided in this form, and the overall scope of the investigation. If you consider that the scope of the investigation should be different, please provide your reasons in the field below including any relevant commodity codes that should be included or removed.

The investigation includes tariff codes 7208 5191 and 7208 5291, which relate to hot-rolled plate of 2050mm width or greater. These widths are not produced by any UK manufacturer and are vital for key sectors such as:

- Yellow goods manufacturing
- Wind turbine construction
- Bridge building
- General heavy construction

These products are often sold at a premium and cannot be economically or technically substituted with narrower plate. Slitting wider plate for narrower applications is not cost-effective and may compromise the structural integrity required by end users.

As such, we contend that these wider plates do not constitute "like goods" for the purposes of this investigation, and their inclusion in the scope is not justified. We respectfully request that they be excluded from the case.

In addition, we would like to point out that there is a lack of clear and specific data to show any injury or harm. Most imported hot-rolled plate is cleared under the commodity code 7208 512010, which covers all plate 600mm or wider and over 15mm thick. This includes wide plates, such as 2500mm and 3000mm, which Spartan UK does not produce. Because this code covers such a wide range of products, it is difficult to tell how much of the imported material actually falls within Spartan's production capability. Without more detailed data, it is difficult to exactly extrapolate what imports are causing any injury or harm to the domestic producers.



### B3. Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types and subcategories of goods that fall under the description of the goods concerned. PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the UK and those produced in the country subject to an investigation.

We have created the following draft PCN table for this investigation:

Category	Subcategory	Code	Description
Prime/non-prime		P1	Prime - Material meets specifications.
		P2	Non-prime – Off-specification material, seconds, etc.
Manufacturing Process		M1	Rolled as individual plate (quarto mill plate, four-high mill plate, etc.).
		M2	Cut-to-length from steel coils ('cut-to-length plate').
Grade	Structural steel (including offshore) (specifications EN 10025-2 through EN 10025-6, EN 10149-2 and EN 10149-3, EN 10225, EN 10343, ASTM, API, etc.).	G11	S235 and below and comparable grades based on minimum yield strength (S185, ASTM A283, etc.).
		G12	S275 and comparable grades based on minimum yield strength (ASTM A36, A572-42, API 2H-42, etc.).
		G13	S355 and comparable grades based on minimum yield strength (ASTM A572-50, A588, A709-50, API 2H-50, API 2W-50, API 2Y-50, etc.).
		G14	S420 to S460 and comparable grades based on minimum yield strength (ASTM A572-60, A572-65, A1066-65, API 2W-60, API 2Y-60, etc.).
		G15	S500 to S690 and comparable grades based on minimum yield strength (ASTM A709-HPS70, A709-HPS100W, A514, etc.).
		G16	Above S690 and comparable grades based on minimum yield strength.
		G21	Shipbuilding steel (specifications ABS, BV, DNV, GL, DNV-GL, KRS, LRS, RINA, RS, ASTM A131, etc.). Grades A, B, D, E and comparable grades based on minimum yield strength (BV-A, B, D, E; NV-A, B, D, E; etc.).



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Category	Subcategory	Code	Description
		G22	Grades A27S, D27S, E27S and comparable grades based on minimum yield strength (NVA27S, D27S, E27S; etc.).
		G23	Grades AH32, DH32, EH32, FH32 and comparable grades based on minimum yield strength (BV-AH32, DH32, EH32, FH32; NV-A32, D32, E32, F32; etc.).
		G24	Grades AH36, DH36, EH36, FH36 and comparable grades based on minimum yield strength (BV-AH36, DH36, EH36, FH36; NV-A36, D36, E36, F36; etc.).
		G25	Grades AH40, DH40, EH40, FH40 to AB-AQ43, DQ43, EQ43, FQ43 and comparable grades based on minimum yield strength (BV-AH40, DH40, EH40, FH40; NV-A40, D40, E40, F40; NV-A420, D420, E420; etc.).
		G26	Grades AQ51, DQ51, EQ51, FQ51 and above and comparable grades based on minimum yield strength (AB-AQ63, DQ63, EQ63; AB-AQ70, DQ70, EQ70, FQ70; NV-A500, D500, E500, F500; NV-A690, D690, E690, F690; etc.).
	<i>Pressure vessel steel (specifications EN 10028-2 through EN 10028-6, EN10120, EN 10207, ASTM(ASME) (S)A203, (S)A387, (S)A516, (S)A537, (S)A517, (S)A553, etc.).</i>	G31	Non-alloy steel
		G32	Alloy steel
	<i>Steels for case-hardening, quenching &amp; tempering (specifications EN 10083-2, EN 10083-3, EN 10084, ASTM A829, ASTM A830, etc.).</i>	G41	Non-alloy steel (C 35, C 10E+N, etc.).
		G42	Alloy steel (25 CrMo 4, 16 MnCr 5+N, etc.).
	<i>Pipeline steel (specifications EN 10208-1, EN 10208-2, API Spec 5L, ISO 3183, DNV-OS-F101, etc.).</i>	G51	All grades of pipeline steel.
	<i>Abrasion-resistant steel (heavy plate having a hardness of <math>\geq 300</math> Brinell).</i>	G61	All grades of abrasion-resistant steel.
	<i>Other steel (heavy plate not falling within one of the steel groups defined above).</i>	G71	Non-alloy steel
		G72	Alloy steel
Width		W1	Less than 1500 mm
		W2	1500 mm or more but not exceeding 2100 mm
		W3	2100 mm or more but not exceeding 3050 mm
		W4	3050 mm or more but not exceeding 3500 mm
		W5	more than 3500 mm
Thickness		T1	4.75 mm to $\leq 8$ mm
		T2	$> 8$ mm to $\leq 10$ mm
		T3	$> 10$ mm to $\leq 80$ mm
		T4	$> 80$ mm to $\leq 150$ mm



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Category	Subcategory	Code	Description
		T5	> 150 mm to ≤ 250 mm
		T6	> 250 mm
Supply condition		N1	Normalised
		N2	Not normalised
Surface condition	<i>For Manufacturing Process Code M1 (individual rolled plate)</i>	C11	Not descaled.
		C12	Descaled (e.g., shot blasted) but not subsequently coated (e.g., by primer coating).
		C13	Descaled and subsequently coated (e.g., by primer coating).
	<i>For Manufacturing Process Code M2 (cut-to-length plate)</i>	C21	Untreated.
		C22	Pickled and not subsequently surface protected (e.g., oiled).
		C23	Pickled and subsequently surface protected (e.g., oiled).

24. Please review the above draft PCN structure for this investigation and provide any comments in the field below (eg. Fields that should be included or removed).

As stated above, inclusion of tariff codes 7208 5191 and 7208 5291 in the scope is not justified. Also 7208 512010, which covers all plate 600mm or wider and over 15mm thick. This includes wide plates, such as 2500mm and 3000mm, which Spartan UK does not produce. Because this code covers such a wide range of products, it is difficult to tell how much of the imported material actually falls within Spartan's production capability. Without more detailed data, it is difficult to exactly extrapolate what imports are causing any injury or harm to the domestic producers.

## B4. Economic Interest Test

25. If, following an investigation or review, we conclude that a measure should be imposed, we conduct an Economic Interest Test (EIT) to determine whether the measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of UK upstream companies (providing inputs for the manufacture of the goods that are like the goods concerned) and UK customers (downstream companies buying the goods)? Please confirm in the final column if we are able to contact these companies.



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Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)
[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – CONTAINS PERSONAL INFORMATION]	CUSTOMER BUYING GOODS	Y
[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – CONTAINS PERSONAL INFORMATION]	CUSTOMER BUYING GOODS	Y
[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – CONTAINS PERSONAL INFORMATION]	CUSTOMER BUYING GOODS	Y
[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – CONTAINS PERSONAL INFORMATION]	CUSTOMER BUYING GOODS	Y
[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – COMMERCIALY SENSITIVE INFORMATION]	[REDACTED – CONTAINS PERSONAL INFORMATION]	CUSTOMER BUYING GOODS	Y

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

## B5. Other comments

26. Please use the field below to provide additional information that you consider relevant to this investigation.

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).