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We write in response to the ongoing anti-dumping investigation AD71 and wish to respectfully register our opposition to the imposition of any trade remedies as part of this investigation and present the below points in support of our position:

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.

Having reviewed UK import data for the relevant commodity codes and quota Order Number 058015 ("Other Countries" plate quota), we note that:

- The utilisation rate of the order number 058015 was approximately 50% during the relevant period.
- The import statistics, using the commodity codes referenced in the investigation across Q2 2024 - Q1 2025 amounted to 455,304 metric tonnes, of which only 14% (48,359 metric tonnes) originated from South Korea.

This indicates that Korean imports have had a limited presence in the UK market. If dumping were truly occurring, one would reasonably expect a significantly higher level of quota usage and market share and therefore these imports are unlikely to have caused injury or market disruption. We also stress that South Korean producers have a long-standing reputation for orderly marketing practices, a principle that we also uphold in our business.

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.

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.

Restricting imports in the current environment where there is only one effective domestic producer would create a monopolistic and uncompetitive market. This would result in higher prices, supply shortages, and long-term damage to UK manufacturing sectors that rely on consistent and diversified supply chains.

In summary, the current market dynamics, production limitations, and import data demonstrate little evidence that there has been injury or unfair competition stemming from Korean imports. The inclusion of wide plate products unsupported by UK manufacturing capability should be removed from the scope of the investigation. We urge the TRA to dismiss this case to ensure fair, competitive, and sustainable market conditions.