



## Registration Form

### Tariff Rate Quota Review

### Case No. TQ0066

|                                 |   |
|---------------------------------|---|
| <b>Period of Investigation:</b> | <input type="text" value="1 January 2024 to 31 December 2024"/>   |
| <b>Deadline for response:</b>   | <input type="text" value="09 April 2025"/>  |
| <b>Case Team Contact:</b>       | <input type="text" value="TQ0066@traderemedies.gov.uk"/>  |
| <b>Completed on behalf of:</b>  | <input type="text" value="POSCO"/>  |
| <b>Party type (select):</b>     | <input type="checkbox"/> UK producer<br><input checked="" type="checkbox"/> Other (exporting producer from South Korea) |

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

- Confidential  
 Non-Confidential – may be made publicly available

Parties providing confidential information should also provide a non-confidential summary of that information or a statement of reasons why it cannot be summarised. 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)) by **09 April 2025**.



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## TRQ review

In conducting the TRQ review, the TRA will consider whether there has been a change in circumstances since the application of the relevant tariff rate quota (see below). As part of the review, the TRA may consider:

- Whether the amount or allocation of the tariff rate quota is appropriate for domestic market conditions;
- The desirability of maintaining, as far as possible, traditional trade flows;
- Any other factors that it considers relevant.

## Scope of the review

This TRQ review will consider whether the tariff rate quotas to which certain steel products are subject should be varied. These product categories are:

- 1 – non-alloy and other alloy hot-rolled sheet and strip (split into categories 1A and 1B – authorised use)
- 4 – metallic coated sheet
- 5 – organic coated sheet
- 6 – tin mill products
- 7 – non-alloy and other alloy quarto plates
- 12 – merchant bars and light sections (split into categories 12A (alloy merchant bars and light sections), and 12B (non-alloy merchant bars and light sections))
- 13 – rebar
- 16 – non-alloy and other alloy wire rod
- 17 – angles, shapes, and sections of iron or non-alloy steel
- 19 – railway material
- 20 – gas pipe
- 21 – hollow section
- 25 – large welded tube (split into categories 25A (large welded tube (1)) and 25 B (large welded tube (2)))
- 26 – other welded tube

A full list of the commodity codes which are included in each category can be found in [Trade remedies notice 2024/06: safeguard measure: tariff-rate quota on steel goods](#).

For more information about this case, you may refer to the Notice of Initiation published at: [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases).



## Instructions

### I – Who should complete this form

You should complete this form if you wish to register your interest in the TRQ review.

### II – Note about confidentiality

Anyone requesting that information be treated as confidential should provide a non-confidential summary of that information or a statement of reasons why it cannot be summarised.

Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.

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.

All information provided to the Trade Remedies Authority (TRA) in confidence will be treated accordingly, only used for this review, and will be stored in protected systems.

The non-confidential version of your submission may be placed on the public file, which is available on [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases).



## Section A – Your organisation’s interest in the review

To register your organisation’s interest in this TRQ review, please complete the text boxes below.

A1. Please describe your interest in this TRQ review:

As an exporting producer of the goods subject to review, POSCO has a direct interest in the TRA’s tariff rate quota review into safeguards on steel.

## Section B – Additional information

B1. Please use the box to provide information about anything else you consider relevant to this TRQ review

POSCO wishes to express the following opinions regarding the tariff rate quota review for UK steel safeguards (case no. TQ0066).

***With respect to the request by ‘UK Steel’ that the TRA terminate the carry-over of quotas between periods, POSCO considers that the quota carry-over system should be maintained for the following two reasons.***

**First**, the use of ships is required when exporting steel from South Korea to the UK. These ships have to travel around the Cape of Good Hope in South Africa to reach their destination. This journey can take up to two months but may be subject to various external factors such as changes in weather conditions. As a result of this and any other potential unforeseen circumstances, the scheduled arrival may have to change, leading to customs clearance delays.

**Second**, customs clearance delays also frequently occur due to congestion at UK ports – notably at Liverpool port. In such events, customs clearance is typically delayed by one to three weeks, which may result in customs clearance occurring later than scheduled.

While it is necessary to supply steel to customers in the UK in a timely manner, delays in customs clearance can prevent such timely supply. To avoid causing potential harm to the UK steel industry and its downstream industries, it is imperative that the quota carry-over system be maintained.

In light of the foregoing, POSCO is of the opinion that a termination of carry-over quotas between periods would cause harm to UK industry. We respectfully request that the quota carry-over system be maintained.



***With respect to the request by UK Steel that the TRA introduce a cap of 15% to residual quotas for categories 4 (metallic coated steel) and 7 (quarto plates), POSCO considers that this request should be denied for the following three reasons.***

**First**, a 15% cap on the use of residual quotas for metallic coated steel and quarto plates would decrease the availability of residual quotas for each country. The decreased availability of quotas would lead to intensified export competition among countries to exhaust the UK's residual quotas first. Consequently, the import volume of metallic coated steel and quarto plates would sharply increase at the beginning of each quarter, driving down prices in the UK. Increased price pressure would distort the market and cause harm, specifically to UK producers of metallic coated steel and quarto plates. Please refer to the table below for specific figures related to this matter.

[Residual quotas for the 8<sup>th</sup> SG year ('25.7 - '26.6) and introduction of a 15% cap]

| (unit: tons)          | 8 <sup>th</sup> SG Year ('25.7 - '26.6) |        |        |        |         |
|-----------------------|---|--------|--------|--------|---------|
|                       | 1Q                                      | 2Q     | 3Q     | 4Q     | Total   |
| Metallic Coated Steel | 88,075                                  | 88,075 | 86,160 | 87,117 | 349,427 |
| 15% cap               | 13,211                                  | 13,211 | 12,924 | 13,068 | 52,414  |
| Quarto Plates         | 26,137                                  | 26,137 | 25,569 | 25,853 | 103,696 |
| 15% cap               | 3,921                                   | 3,921  | 3,835  | 3,878  | 15,554  |

**Second**, UK producers are not self-sufficient in supplying across all steel product categories covered by the transition review. In the absence of reliable domestic production options for a number of production categories, the UK market heavily relies on imports of steel. A potential cap on the use of residual quotas for metallic coated steel and quarto plates would lead to a shortage in the supply of these products in the UK. To avoid this, there should be no further reduction of tariff rate quotas. Furthermore, As demonstrated below, import statistics show that those countries that export the most metallic coated steel and quarto plates to the UK are EU Member States. The countries that have been allocated the most country quotas for metallic coated steel and quarto plates are also EU Member States.

Considering the recent reduction of quotas for metallic coated steel and quarto plates as well as the significant reduction in the permitted use of residual quotas through the steel safeguard review in the EU, it is expected that EU producers of steel will shift their export sales to intra-EU sales. In light of the UK's reliance on the EU for most of its imports of metallic coated steel and quarto plates, the introduction of a cap on residual quotas would lead to a shortage in the supply of these products within the UK due to a shift of sales by EU producers and a sharp decline in imports from non-EU countries. This would cause significant harm to UK industries.



[Residual and country-specific quotas for the 8<sup>th</sup> SG year ('25.7-'26.6)]

| (Unit: thousand tons)   |                            | 8 <sup>th</sup> SG Year ('25.7 - '26.6) |     |     |     |       |
|---|----------------------------|---|-----|-----|-----|-------|
|   |                            | 1Q                                      | 2Q  | 3Q  | 4Q  | total |
| Metallic coated steel   | EU country-specific quotas | 334                                     | 334 | 326 | 330 | 1,323 |
|   | Residual quotas            | 88                                      | 88  | 86  | 87  | 349   |
| Allocation of country-specific quotas compared to residual quotas |                            |   |     |     |     | 279%  |
| Quarto plates   | EU country-specific quotas | 73                                      | 73  | 72  | 72  | 291   |
|   | Residual quotas            | 26                                      | 26  | 26  | 26  | 104   |
| Allocation of country-specific quotas compared to residual quotas |                            |   |     |     |     | 180%  |

[Import statistics (EU member states & other countries)]

| (Unit: thousand tons) |                  | FY 2022 | (%)  | FY 2023 | (%)  | FY 2024 | (%)  |
|-----------------------|------------------|---------|------|---------|------|---------|------|
| Metallic coated steel | EU member states | 493     | 49%  | 524     | 54%  | 503     | 50%  |
|                       | Other countries  | 524     | 51%  | 451     | 46%  | 495     | 50%  |
|                       | Sub-Total        | 1,017   | 100% | 975     | 100% | 999     | 100% |
| Quarto plates         | EU member states | 255     | 81%  | 266     | 80%  | 237     | 76%  |
|                       | Other countries  | 61      | 19%  | 66      | 20%  | 73      | 24%  |
|                       | Sub-Total        | 316     | 100% | 332     | 100% | 310     | 100% |

※source : ISSB (International Steel Statistics Bureau)

Also, on 19 March 2025, the European Commission announced in the statement of its 'Steel and Metal Action Plan' that it would seek to reduce steel imports by 15% through its steel safeguard review, leading to a decrease in EU imports of metallic coated steel and quarto plates. Where the EU imported a total of 4,698,000 tonnes of metallic coated steel in 2024, a 15% reduction would result in a decrease of 705,000 tonnes in imports. For quarto plates, out of a total import of 2,231,000 tonnes in 2024, a reduction of 335,000 tonnes is expected.

Following the Commission's announcement of its ambition to reduce steel imports by 15%, its recent steel safeguard review has imposed caps on the use of residual tariff rate quotas with respect to metallic coated steel and quarto plates. For illustration, as of 2024, the total import volume of EU-origin metallic coated steel into the UK is 503,000 tonnes, which is less than the projected decrease of 705,000 tonnes in EU metallic coated steel imports. The total import volume of EU-origin quarto plates in 2024 was 237,000 tonnes, which is notably also less than the projected decrease of 335,000 tonnes in EU imports of quarto plates.



**Third**, UK imports of steel originating in South Korea are fair, reliable, and consistent with their historical average. A cap on residual quotas would lead to a sharp decline in the supply of South Korean metallic coated steel and quarto plates in the UK, requiring UK customers to seek out alternative sources. This would take time and could lead to a long-term shortage of metallic coated steel and quarto plates in the UK, causing unnecessary harm to UK customers and steel-related industries.

In light of the foregoing, POSCO is of the opinion that the introduction of a 15% cap on tariff rate quotas would cause harm to UK industries. We respectfully insist that the TRA does not introduce a further reduction of tariff rate quotas applicable to UK imports of steel. We further request the establishment of a fair country-specific quota for steel products originating in South Korea. According to Article 5 of the WTO Safeguards Agreement, country-specific quotas should be allocated at a level not less than the average import volume of the most recent three years.

We have attached the relevant import statistics for your reference and kindly request your positive consideration.

[Import statistics – South Korea (2022 – 2024)]

| (unit : tons)         | FY 2022 | FY 2023 | FY 2024 | Average |
|-----------------------|---------|---------|---------|---------|
| Metallic coated steel | 76,405  | 93,498  | 118,057 | 95,987  |
| Quarto plates         | 26,829  | 42,232  | 42,444  | 37,168  |

※source : ISSB (International Steel Statistics Bureau)

POSCO relies on maintaining fair and predictable trade conditions, which directly impact our ability to supply steel products to the UK market efficiently. It is therefore important to consider POSCO's supply of essential product categories as well as historical import averages.

We respectfully request the Trade Remedies Authority to consider all of the above in the conduct of its review. POSCO is committed to improving fair market conditions in the UK and is glad to provide the Authority with its assistance throughout this transition review.