



**International Steel Trade Association**

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To whom it may concern at the Trade Remedies Authority

Ref: Anti Dumping investigation AD71

We note that this investigation has been requested by Spartan UK and includes the tariff headings 7208 5191 and 7208 5291 - hot rolled plate in equal to or in excess of 2050mm width – which neither they nor any other manufacturer in the UK produce.

These widths of plate are used in the yellow goods industry, wind turbines, bridges and general construction. Often attracting a price premium, it is out of the question that they would be slit and used in applications calling for narrower widths as this could potentially compromise the quality of the product and would not be cost effective.

We would therefore consider that these are not like goods for the purpose of this investigation, do not cause injury to the industry, and thus request that they are removed.

With regard to the remaining headings under the investigation, we oppose any restrictions on imports as there is currently only one producer of plate in the UK and to restrict imports would cause not only a monopolistic but an uncompetitive market.

We would further suggest that as Hot rolled plate from South Korea remains subject to safeguarding measures, including a proposed quantity cap, there should be no need to impose a Provisional Affirmative Determination.

Yours faithfully,

Simone Draper  
Director