



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): | <i>POSCO</i> <i>This entity produces the goods concerned. This entity is, together with its related entities, referred to in the present registration form as "POSCO".</i> |
|---|---|

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).

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).

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"> • 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 • Flat-rolled products of iron or non-alloy steel, of a width of 600mm or more, clad; and/or • 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. <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> |
|-----------------|--|



| | |
|-------------------------------|-------------------------------|
| Period of investigation (POI) | 1 April 2024 to 31 March 2025 |
|-------------------------------|-------------------------------|

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).

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.



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.

Not applicable



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.

*POSCO produces and sells the goods concerned. More information about POSCO's products that qualify as the goods concerned can be found on the relevant webpage: Features & Application - Steel Plate - Products - POSCO PRODUCTS
<http://product.posco.com/homepage/product/eng/jsp/process/s91p2000210p.jsp>*

POSCO understand the commodity codes for POSCO's goods concerned are 7208.51 and 7208.52.

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] | <i>[commercially sensitive data: non-confidential range: 1,000-8,000] (Thousand MT)</i> |
| Total production capacity of the goods concerned (POI) [tonnes] | <i>[commercially sensitive data: non-confidential range: 1,000-8,000] (Thousand MT)</i> |

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 |
|--|--------------------------|------------|--------------|
| <i>[Redacted – commercially sensitive information]</i> | | | |
| | | | |
| | | | |
| | | | |



| | | | |
|--|--|--|--|
| | | | |
| | | | |
| | | | |
| | | | |

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] | <i>[commercially sensitive data: non-confidential range: 500-5,000] (Thousand MT)</i> |
| Total domestic sales value of the goods concerned (POI) [£] | <i>[commercially sensitive data: non-confidential range: 800,000-2,000,000] (Thousand £)</i> |

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

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.

The major inputs for production process for the goods concerned produced by POSCO are [redacted – commercially sensitive information]. In terms of costs for these major inputs, [redacted – commercially sensitive information] during the period of investigation.



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] | <i>N/A</i> |
| Total indirect export volume (POI) [tonnes] | <i>[commercially sensitive data: non-confidential range: 1-100] (Thousand MT)</i> |
| Total direct export value (POI) [£] | <i>N/A</i> |
| Total indirect export value (POI) [£] | <i>[commercially sensitive data: non-confidential range: 5,000-50,000] (Thousand £)</i> |

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 |
|--|-------------------------------------|------------|--------------|
| <i>[Redacted – commercially sensitive information]</i> | | | |
| | | | |
| | | | |
| | | | |



| | | | |
|--|--|--|--|
| | | | |
| | | | |
| | | | |

Add additional rows as required

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

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

The commodity codes under which POSCO exported the goods concerned to the UK during the POI are 7208.51 and 7208.52.

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] | |
| Total import value (POI) [£] | |

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 |
|--------------|----------------------------------|-------------------------------------|--------------|
| | | | |
| | | | |

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.
- 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.

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.

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:



| | 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 your 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.

Please also refer to our response to question 25 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.

None at this stage.

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. |



| Category | Subcategory | Code | Description |
|-----------------------|--|------|---|
| 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 | <i>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.).</i> | 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. |
| | <i>Shipbuilding steel (specifications ABS, BV, DNV, GL, DNV-GL, KRS, LRS, RINA, RS, ASTM A131, etc.).</i> | G21 | Grades A, B, D, E and comparable grades based on minimum yield strength (BV-A, B, D, E; NV-A, B, D, E; etc.). |
| | | 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.). |
| | | G31 | Non-alloy steel |



| Category | Subcategory | Code | Description |
|--------------------------|--|-------------|--|
| | <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> | G32 | Alloy steel |
| | <i>Steels for case-hardening, quenching & 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 ≥ 300 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 ≤ 8 mm |
| | | T2 | > 8 mm to ≤ 10 mm |
| | | T3 | > 10 mm to ≤ 80 mm |
| | | T4 | > 80 mm to ≤ 150 mm |
| | | 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).



Overall, POSCO considers that the TRA’s proposed PCN classification is suitable, except for the way in which the subcategories are created within two categories (i.e. width and thickness). POSCO believes the TRA identified the relevant categories, that have an important impact on price comparability.

However, as regards “Width” and “Thickness”, POSCO considers that the subcategories need to be amended. Specifically, there need to be more codes to reflect more accurately the width and thickness. POSCO also does not consider the proposed cut-off points to always be the most relevant points in terms of price comparability. Therefore, POSCO has proposed in Annex 1 a more refined way to approach the width and thickness respectively.

POSCO notes the following:

- Width and thickness are among the most important categories that impact costs and price comparability. Therefore, for these two categories, it is important to have sufficiently refined subcategories.*
- [Redacted – commercially sensitive information regarding POSCO’s product specifications and pricing].*

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.

| Company name | Company location (city, country) | Contact details (email/tel.) | Relationship | Contact permission (Y/N) |
|--|----------------------------------|------------------------------|--------------|--------------------------|
| <i>[Redacted – commercially sensitive information]</i> | | | | |
| | | | | |
| | | | | |
| | | | | |



Trade Remedies
Authority

OFFICIAL

Registration form and
Pre-sampling questionnaire

Confidential

Non-confidential