



**Registration Form**  
**Tariff Rate Quota (TRQ) Review**  
**Case No. TQ0077**

**Period of Investigation:** 1 October 2024 – 30 September 2025

**Deadline for response:** 25<sup>th</sup> January 2026

**Case Team Contact:** TQ0077@traderemedies.gov.uk

**Completed on behalf of:** POSCO

**Party type (select most relevant party types):**

- Government of a foreign country or territory
- Overseas exporter of the goods subject to review
- Importer of the goods subject to review
- UK Producer of the like goods or directly competitive goods
- Trade or business association of the like goods, directly competitive goods, or goods subject to review
- Overseas producer of the goods subject to review
- Other (contributor)

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



Trade Remedies  
Authority

Trade Remedies Authority

Confidential  Non-Confidential

Non-Confidential – will 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 **25 January 2026**.



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## TRQ review

Under regulation 35B(1) of the Regulations, the TRA may conduct a review to consider whether a tariff rate quota (TRQ) to which the goods are subject should be varied or revoked where it is satisfied that there is sufficient information indicating that there may have been a change of circumstances since the application of that TRQ to those goods. As part of the review, the TRA may consider:

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

## Change in circumstances

The TRA will review trade data on Categories 4 and 7 to determine if there has been a change of circumstances which corresponds with the provisions in regulation 35B(9) of The Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (the Regulations).

## Scope of the review

The TRA will consider whether the tariff rate quotas to which certain steel products are subject should be varied. The TRA will consider whether certain commodity codes in categories 4 and 7 which have been specified in the applications should be removed from the safeguard measure.

The following commodity codes are the goods subject to review, in accordance with requests in the applications:

### **Category 4 – metallic coated sheet**

*7210 6100 20*

*7210 6900 80*

### **Category 7 – non-alloy and other alloy quarto plates**

*7208 5191 00*

*7208 5291 00*

*7208 5198 00*

*7208 5120 00*

*7208 5299 00*

*7208 5120 10*

For more information about this case including further details about the goods subject to review, you may refer to the Notice of Initiation published at:



<https://www.trade-remedies.service.gov.uk/public/case/TQ0077/submission/b1168828-12d3-49f7-9a59-013da369906d/>

## Instructions

### I – Who should complete this form

You should complete this form if you wish to register your interest in the TRQ review and comment on the proposed changes to the TRQ concerning Categories 4 and 7. The applications are available on the public file.

### II – Note about confidentiality

Anyone requesting that information be treated as confidential must demonstrate to the TRA good cause as to why the TRA must treat such information as confidential and 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:

<https://www.trade-remedies.service.gov.uk/public/case/TQ0077/#public-file>



## Registration questions

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

To register your organisation’s interest in this TRQ review **you must complete question A1**. All other questions are optional and can be left blank.

A1. Please describe your interest in this TRQ review:

POSCO produces and sells the goods subject to review, specifically those covered by **Category 7** (non-alloy and other alloy quarto plates).

### Section B – Questions concerning category 4 and 7 products

**B1. If you are a UK producer of category 4 or 7 products or goods that are directly competitive with these product categories OR an overseas exporter or producer of the goods subject to review**, please state which relevant products you produced during the POI or have the facilities to produce at a 10-digit commodity code level.

Please provide evidence to support this, such as documentation of production facilities capable of producing category 4 or 7 products, or any other evidence that demonstrates that your organisation can produce category 4 or 7 products.

POSCO produces and sells the goods subject to review, specifically those covered by **Category 7** (non-alloy and other alloy quarto plates), covering, among others, the following commodity codes: 7208 5191 00, 7208 5291 00, 7208 5198 00, 7208 5120 00, 7208 5299 00, 7208 5120 10.  
More information about POSCO’s products that qualify as the goods concerned can be found on the relevant webpage:  
<http://product.posco.com/homepage/product/eng/jsp/process/s91p2000210p.jsp>.

**B2. If you are a UK importer of category 4 or 7 products**, please state which relevant products that you have imported during the POI at a 10-digit commodity code level.



Please provide supporting evidence such as purchase invoices or contracts with suppliers.

N/A

**B3. If you are a UK importer of category 4 or 7 products**, have you attempted to purchase the like goods or directly competitive goods from UK producers. If this attempt did not result in procurement of the like goods or directly competitive goods from a UK supplier, please explain why your organisation chose to use an overseas supplier instead.

Please provide supporting evidence, such as procurement process documentation.

N/A

**B4.** Please comment on whether there are any goods produced in the UK that are directly competitive with the category 4 and 7 products captured by the commodity codes listed within the scope of this review. If so, please explain to what extent are these goods directly competitive.

Please provide supporting evidence, such as documents proving common use cases.

Please find attached Annex 1, which provides information on the extent to which goods produced in the UK are directly competitive with Category 7 products covered by the commodity codes listed within the scope of this review.



B5. Please comment on whether it is likely that UK producers of the like goods or directly competitive goods would be injured if the goods subject to review were removed from the safeguard measure. If so, please comment on how significant this injury would be.

Please provide supporting evidence.

Continued application of safeguard measures on wide heavy plates exceeding 2,050/2,100 mm in width could increase costs, disrupt supply chains, and cause project delays. Such impacts may undermine the competitiveness of UK industries, including offshore wind, offshore plants, and shipbuilding.

Excluding plates over 2,100 mm from the scope of safeguard measures would not adversely affect the UK domestic industry, as these products are not substitutable with those currently manufactured in the UK.

Please refer to the attached Annex 1 for a detailed explanation.

### **Section C – Further comments concerning the applications and any other aspect of this TRQ review**

C1. Please provide any further comments concerning the applications or any other aspects of this TRQ review.

Please refer to the attached Annex 1 for our comments concerning this review.



## Annex 1

POSCO respectfully presents the following observations for the consideration of the UK Trade Remedies Authority (TRA) in the context of the ongoing review of the safeguard measure on heavy plate products.

In light of the continuing supply constraints arising from the current quota's insufficiency relative to domestic demand, POSCO wishes to draw attention to the potential benefits of excluding from the safeguard scope:

- Heavy plates with widths exceeding 2,050 mm;
- Heavy plates with thicknesses between 4.75mm and 15mm, or greater.

### **1. UK Production Capacity for Heavy Plates is Limited to a Maximum Width of 2,100 mm**

The UK's domestic production capacity for heavy plates is limited both in scale and specification. Notably, no UK manufacturer currently produces heavy plates with widths exceeding 2,100 mm. For instance, the leading domestic producer, Spartan UK, states on its website that it can produce plates with a maximum width of only 2,100mm.<sup>1</sup> As a result, heavy plates with widths greater than 2,100 mm are not available from UK producers and must be sourced from overseas suppliers.

The UK heavy plate market serves a wide range of industries, including large-scale infrastructure, shipbuilding, offshore plants, and offshore wind power. However, due to capacity constraints, wide-width heavy plates – particularly those in the 2,100–4,000mm range – are entirely dependent on imports. These specifications are indispensable for large offshore structures and ultra-large vessel construction, yet domestic production capacity for such products is absent.

### **2. POSCO Exports and Industry Requirements**

On average, products with widths exceeding 2,050 mm represent approximately *[[redacted – commercially sensitive information regarding POSCO's sales structure]]*, serving applications in shipbuilding, offshore wind structures, and large industrial projects.

The UK's offshore plant and shipbuilding sectors require a stable and predictable supply of large-specification heavy plates to sustain their global competitiveness. Offshore wind projects, in particular, rely on wide and thick plates for turbine foundation structures and subsea platforms. These projects are closely aligned with the UK Government's renewable energy expansion objectives, and any instability in

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<sup>1</sup> <https://spartan.metinvestholding.com/en-us/products-and-services/>



material supply could risk delays in project timelines and the achievement of investment targets.

### **3. UK Heavy Plate Import Dependence**

The UK remains significantly reliant on imports to meet its heavy plate requirements. According to TRA data, imports from Korea increased by approximately 186% between 2021 and 2023. Most of these imports comprise wide and ultra-wide heavy plates, which are not manufactured domestically. Thus, this growth reflects both the limitations of domestic production and the rising demand for large-specification plates.

Given that heavy plates exceeding 2,100mm in width cannot be produced domestically, overseas suppliers – such as those from Korea – are the only viable source for these products.

### **4. Potential Impact of the Safeguard Measure**

The continued application of the safeguard measure to heavy plates exceeding 2,050/2,100 mm in width would result in additional tariffs, increasing costs, and potentially causing supply chain disruptions and project delays. Such outcomes could adversely affect the competitiveness of UK industries, including offshore wind, offshore plants, and shipbuilding, and may hinder the fulfilment of contractual obligations to international clients.

Conversely, excluding wide heavy plates, especially those with widths greater than 2,100 mm, from the scope of safeguard measures would not harm the UK domestic industry, as these products are not substitutable with the plates currently manufactured in the UK.

In this context, POSCO notes the request submitted by the International Steel Trade Association (ISTA) to exclude these specifications from the safeguard measure. POSCO respectfully submits that such an exclusion would contribute to supply stability, help preserve the UK's international competitiveness, and benefit the UK's industrial base, including sectors such as bridge construction, wind turbines, machinery manufacturing, defence, shipbuilding, the yellow goods industry, and general construction.

POSCO trusts that the TRA will give due consideration to these observations and reach a decision that reflects both the practical realities of the UK's industrial needs and the broader policy objectives of sustainable economic growth.