



Review of Tariff Rate Quota on certain steel products

Case SM0015

Recommendation to the Secretary of State

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A Introduction

A1 Purpose

1. On 11 November 2021 HM Revenue & Customs (HMRC) published a change to official trade statistics affecting datasets used by the Trade Remedies Authority (TRA)

as the basis for calculating tariff rate quotas (TRQs) imposed as a result of the earlier transition review of steel safeguard measure (TF0006 – ‘the transition review’).¹

2. On 4 February 2022 the TRA initiated a TRQ review pursuant to regulation 35B(2)(b) of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 (as amended)² (the Safeguard Regulations) into goods belonging to steel product categories 4 (metallic coated sheets), 5 (organic coated sheets), and 19 (railway material) because of this change. The Notice of Initiation can be found on the case public file.^{3, 4}

A2 Legal framework

3. This Recommendation is made pursuant to regulation 37(1) of the Safeguard Regulations. It includes:
 - a. a description of the goods to which this Recommendation relates;
 - b. the reasons for this recommendation;
 - c. the recommended period for which the definitive safeguarding remedy should be applicable;
 - d. information which we consider is likely to be relevant to the Secretary of State's decision as to whether it would not be in the public interest to accept the this Recommendation;
 - e. any other information which we consider relevant.

A3 Background

4. On 1 October 2020, the TRA published a [Notice of Initiation](#) for a transition review of the EU safeguard measure on certain categories of steel products under regulation 49 of the Safeguard Regulations (TF0006).
5. On 3 June 2021, the TRA made a [Recommendation](#) to the Secretary of State for International Trade at the conclusion of its transition review.⁵
6. Details of the existing measure are set out in [Trade remedies notice 2021/01: safeguard measure: tariff-rate quota on steel goods](#) (updated 22 March 2022) and [Trade remedies notice 2021/03: safeguard measure: tariff-rate quota on steel goods](#), published by the Secretary of State on 30 June 2021 and with effect from 1 July 2021.

¹ Until June 2021, the UK's trade remedies investigations functions were carried out by the Trade Remedies Investigations Directorate (TRID) as part of the UK Department for International Trade (DIT). On 1 June 2021, the Trade Remedies Authority (TRA) was established as an executive non-departmental government body sponsored by DIT. In this document 'the TRA' is used to cover all of our activities both before and after our establishment as the TRA.

² Statutory instrument 2019/449.

³ Notice of Initiation, <https://www.trade-remedies.service.gov.uk/public/case/SM0015/submission/9eee5fc7-7880-4099-a43e-aa2002164e88/>

⁴ SM0015 public file, <https://www.trade-remedies.service.gov.uk/public/case/SM0015/>

⁵ TF0006 Recommendation to the Secretary of State for International Trade, <https://www.trade-remedies.service.gov.uk/public/case/TF0006/submission/187acc2-e0e6-40b7-8d2f-fdc9b10d536d/>

7. On 7 September 2021, the TRA initiated a reconsideration of its transition review of safeguard measures on certain steel products.
8. The June 2021 TRA recommendation for category 19, and its basis on challenged data, is one of the grounds the TRA was asked to address during our reconsideration of the transition review. The TRA also received reconsideration grounds relating to category 4 but not regarding HMRC data. Category 5 was not subject to reconsideration.
9. The TRA suspended reconsideration work on all grounds related to the HMRC data revision in order that this review could be undertaken.
10. On 2 March 2022, The Trade Remedies (Review and Reconsideration of Transitioned Trade Remedies) Regulations 2022⁶ (the Call-in Regulations 2022) came into force, giving the Secretary of State for International Trade (the Secretary of State) the ability to 'call in' transition reviews and related reconsiderations conducted by the TRA.
11. On 22 March 2022, the Secretary of State called in the TRA's reconsideration of the Recommendation to the Secretary of State (see paragraph 5 above) at the conclusion of its transition review. The TRA worked closely with the Department for International Trade (DIT) in completing this reconsideration and submitted our final Report of Findings to the Secretary of State on 1 June 2022.
12. The public file for the steel safeguard reconsideration can be found at <https://www.trade-remedies.service.gov.uk/public/case/TF0006>.
13. The TRA has also undertaken two further TRQ reviews regarding
 - a. developing-country exceptions (SM0016⁷, which is and scheduled to conclude at the same time as this review SM0015); and
 - b. TRQ allocations to Russia and Belarus (SM0019⁸, which concluded with a Recommendation to the Secretary of State on 29 April 2022).
14. The outcome of this TRQ review is in line with the other TRQ reviews and with TRQs proposed by the TRA in our Report of Findings to the Secretary of State under the called-in reconsideration.

B Review process

B1 Overview

15. The TRA initiated this TRQ review on its own initiative, under regulation 35B(2)(b) of the Safeguard Regulations, having identified sufficient information that indicated there may have been a change of circumstances since the application of the TRQs in respect of the Goods Subject to Review (see section B2.2 below).

⁶ Statutory instrument No. 2022/113.

⁷ <https://www.trade-remedies.service.gov.uk/public/case/SM0016/>

⁸ <https://www.trade-remedies.service.gov.uk/public/case/SM0019/>

16. On the day of initiation (4 February 2022) we published a proposed course of action, including a proposed reallocation of TRQs.⁹ An initial registration period for interested parties concluded on 11 February 2022. Interested parties had until 18 February 2022 to comment on our proposed course of action and submit any additional information relevant to the review via the Trade Remedies Service. For submissions made after that date, we considered whether accepting the information would significantly impede the progress of the review. The submissions received are described in section C2.
17. During the review, we sought to establish whether and how TRQs should be revised in relation to product categories 4 (metallic coated sheets), 5 (organic coated sheets), and 19 (railway material). These are the three relevant categories where the TRA recommended the safeguard measure should be maintained or varied in June 2021. The scope of this review is explained in section B2 below.
18. In this TRQ review, we considered:
 - whether there has been a change in circumstances since the application of TRQs to the Goods Subject to Review (section B3 below);
 - whether the amount and allocation of the existing TRQs are appropriate for the UK domestic market (section B4 below); and
 - the data sources and methodology appropriate to calculate TRQs with the aim to maintain traditional trade flows (section B4 below).
19. The public file for this review can be found on the [Trade Remedies Service](#).¹⁰

B2 Scope

B2.1 Countries

20. The change of circumstances that we identified as the basis to initiate this review followed from the revision to official trade statistics by HMRC on 11 November 2021.
21. The existing country-specific allocations for affected categories are
 - a. Category 4: China, South Korea, Taiwan
 - b. Category 5: South Korea
 - c. Category 19: EU
22. Each category has a further residual quota allocation available for imports from countries without specific allocations.

B2.2 Goods Subject to Review

23. 'Goods Subject to Review' are defined in regulation 2 of the Safeguard Regulations as 'the goods described in the notice of initiation of a review'. The Notice of Initiation for this review can be found [here](#).¹¹

⁹ <https://www.trade-remedies.service.gov.uk/public/case/SM0019/submission/f5ccd828-5fc6-4dd7-80b5-c71f05f4ba27/>

¹⁰ UK Trade Remedies Service, www.trade-remedies.service.gov.uk/ SM0015 public file <https://www.trade-remedies.service.gov.uk/public/case/SM0015/>

¹¹ <https://www.trade-remedies.service.gov.uk/public/case/SM0019/submission/583d3b1b-4c64-457c-ab81-1f6db7a65971/>

24. The Goods Subject to Review in this TRQ review are set out in Table 1, below.

Table 1: The Goods Subject to Review

Product Number	Product Category	Commodity Codes
4	Metallic Coated Sheets	7210 20 00, 7210 41 00, 7210 49 00, 7210 61 00, 7210 69 00 20, 7210 69 00 80, 7210 90 80, 7212 20 00, 7212 30 00, 7212 50 20, 7212 50 30, 7212 50 40, 7212 50 61, 7212 50 69, 7212 50 90, 7225 91 00, 7225 92 00, 7225 99 00, 7226 99 10, 7226 99 30, 7226 99 70
5	Organic Coated Sheets	7210 70 80, 7212 40 80
19	Railway Material	73 02 10 22, 73 02 10 28, 73 02 10 50

B3 Change of circumstances

25. We considered the period from 2015 to 2019 (the 'Period of Investigation' or 'POI') to assess whether a change of circumstances has occurred since the application of the TRQs. The TRA considered HMRC data for this period to assess a change in circumstances since the application of the TRQs on the goods subject to this review.
26. On 3 June 2021 the TRA made its Recommendation to the Secretary of State at the conclusion of its transition review of EU safeguard measure on certain categories of steel products. On Thursday 11 November 2021 HMRC issued revised figures for the data regarding certain commodity codes on which the TRA based its recommended TRQs in relation to categories 4 (metallic coated sheets), 5 (organic coated sheets), and 19 (rail materials).
27. This means that the published data on which the TRA based this aspect of its recommendation to the Secretary of State at the conclusion of its transition review is now established to have been incorrect.
28. We conclude that the HMRC data revision constitutes a change of circumstances in relation to the TRQs concerned.

B4 Methodology

B4.1 Current TRQs

29. DIT calculated the TRQs for the transitioned measure (applicable between 1 January 2021 and 30 June 2021) based on 2015 to 2017 average import volumes, following the methodology applied by the EU.
30. The TRQs calculated during the transition review (which have applied since 1 July 2021) were based on average import volumes during the calendar years 2017 to 2019.
31. The TRA may not recommend a more restrictive measure (see paragraph 21(9)(a) and (c) of Schedule 5 to the Taxation (Cross-Border Trade) Act 2018). Where 2017 to 2019 data led to the conclusion that a more restrictive measure (than the transitioned safeguard measure) would otherwise have been imposed, the TRA recommended maintaining the then-existing allocation as set by DIT. However, country-specific quota

allocations were based on 2017 to 2019 average import volumes, even if quota amounts are based on 2015 to 2017 import data.

32. For this TRQ review the TRA continued to use the representative period from 2017 to 2019 to establish the traditional trade flows of the Goods Subject to Review.
33. Consistent with the Developing Countries Exception TRQ Review (SM0016) we also used recent import data to identify any change in the pattern of imports from relevant countries, whether imports from a developing country member of the WTO have passed either above or below the relevant market share thresholds as set out in regulation 43 of the Safeguard Regulations (developing country exception); and whether any countries previously exempt from the safeguard measure on the basis of a trade agreement with the UK should be brought into scope.

B4.2 Amount and allocation of TRQs

34. The TRA has also considered whether the TRA's recommendation to the SoS at the conclusion of its transition review to maintain, vary, or revoke the safeguard measure in relation to each of the three concerned product categories (4, 5, and 19) would have been different as a result of the revised HMRC data.
35. As shown in table 2 the TRA found that the data revisions either do not significantly affect trade data (category 4), strengthen the basis of the TRA original decision (category 5), or do not affect the original period of investigation and so do not affect the outcome (category 19).

Table 2: Reassessment of TRA conclusions re category TRQs

Product Category	Description	June 2021 TRA Recommendation	HMRC data revision impact
4	Metallic Coated Sheets	Vary	No significant changes in imports.
4B	Metallic Coated Sheets	Revoke - No UK production	No change in data re UK production.
5	Organic Coated Sheets	Vary	The revised HMRC data reveals an even higher increase of imports throughout the period of investigation. This reinforces the TRA recommendation in the original decision.
19 [i] ¹²	Railway Material	Vary	Only 2019 data has changed. 2019 falls outside the TF0006 POI. Our recommendation remains the same – do not revoke at this stage.
19 [ii] ¹⁴	Railway Material	Revoke - No UK production	No change in data re UK production.

¹²Note: in the TRA original decision category 19 was split because certain commodity codes were subject to different recommendations as above.

36. The TRA therefore determine that none of the TRA's conclusions regarding whether any TRQ should be maintained, varied, or revoked would have been different if based on the revised data and that the status of each TRQ should remain unchanged.

C Summary of facts considered

C1 HMRC

37. We have used import data from HMRC to analyse trade flows in this TRQ review.

Country of origin

38. The data used in the original transition review was routinely published import data based on country of dispatch.
39. The dataset used in this TRQ review additionally uses country of origin for imports dispatched from non-EU countries and country of dispatch for imports dispatched from EU countries (there is no country of origin available for EU imports pre-2022). This data is not routinely published by HMRC but is available on request.
40. While the differences in datasets are usually small some TRQ allocations were changed as a result:
- Vietnam in product category 4: in the transition review Vietnam did not pass the 3% developing country exception threshold. However, using the adapted approach including country of origin HMRC import data, the country should have access to the residual quota.
 - Turkey in product category 4 currently has access to the residual quota on the basis of country of dispatch data; however, using the country of origin data set, the average import share from 2017 to 2019 is above 5% and so Turkey should have a country-specific allocation.
41. Proposed changes to the allocations of these two countries result from using updated trade flow data and not from the HMRC data revision identified as a change of circumstances in section B3.
42. Use of country of origin data instead of country of dispatch data was suggested in submissions made by an interested party responding to the Notice of Initiation for this review.

Developing country exceptions

43. Additionally, as per paragraph 13(b) the TRA has conducted a separate TRQ Review relating to developing-country exceptions (SM0016).¹³
44. It is important that our Recommendations resulting both from this review (SM0015) and from the developing countries exception review (SM0016) be correct and consistent.
45. The TRA has therefore taken account in this Recommendation of the findings in the developing countries exception review (SM0016). This results in changing allocations

¹³ <https://www.trade-remedies.service.gov.uk/public/case/SM0016/>

for quotas relating to categories 4 and 5 as detailed in the TRA [Statement of Intended Final Determination for the developing countries exception review](#) (SM0016).¹⁴

C2 Submissions

46. The TRA received six timely and confidentiality-compliant registrations from interested parties which were accepted.
47. The TRA received four late but confidentiality-compliant registrations from interested parties before the review concluded. These were accepted (without prejudice to later TRA decisions in this or other cases).
48. The TRA received five further late registrations from interested parties before the review concluded which were not confidentiality compliant. These were not accepted.
49. The TRA received four timely submissions from interested parties which complied with confidentiality guidance and could therefore be published on the public file and considered material to the review.
50. The TRA received four further submissions from interested parties which were either late and/or were not confidentiality compliant. The TRA has discretion to accept and take into account information supplied outside an applicable time limit where it is appropriate do so.
51. We considered the statements of registered parties holistically and with special circumspection when assessing whether there has been a change of circumstances since the application of the TRQs.
52. We summarise and consider below the four timely and compliant submissions (C2.1 to C2.4) and accepted points from the further submissions (C2.5).
53. The non-confidential versions of all the submissions to this review can be found on the public file [here](#).¹⁵

C2.1 Tata Steel UK Ltd (domestic producer)

	Comment	TRA consideration
1	Some affected TRQs were already made relatively more liberal during the transition review because the TRA used 2017-2019 as a TRQ calculation reference period rather than 2015-2017.	During the transition review the TRA considered that 2017-2019 were the last three representative years and represent the traditional trade flows in line with WTO principles.
2	The proposed increase in TRQs is not consistent with the fundamental objective of safeguard measures. The initial liberalization of the TRQs has had a serious practical impact on TSUK's business in the domestic market. Any further increase will create a trade environment which will have nothing in common with the historic trade flows.	The TRA are rectifying TRQs which were based on incorrect information. As a matter of good administration public bodies should correct known errors. During the transition review the TRA considered that 2017-2019 were the last three representative years and represent the

¹⁴ <https://www.trade-remedies.service.gov.uk/public/case/SM0016/submission/3b7e22e7-cd06-426e-82fd-0db0c8e0a554/>

¹⁵ <https://www.trade-remedies.service.gov.uk/public/case/SM0015/>

		traditional trade flows in line with WTO principles.
3	The proposed changes will have a major negative impact on the performance and sustainability of the domestic industry.	The TRA are rectifying TRQs which were based on incorrect information. As a matter of good administration public bodies should correct known errors.
4	TSUK were not able to predict that these TRQs would be further increased which would have had a significant impact on their initial position during the transition review.	TRQs are always subject to possible review - this Review is the opportunity for interested parties to comment.

C2.2 Hadley (importer)

	Comment	TRA consideration
1	Hadley Industries relies on a readily available source of Metallic Coated Sheet (Cat 4) which is then processed (Cold Section Rolled) and then predominantly supplied into the UK construction sector. Domestic producers supply only very limited quantity of material suitable for the UK construction sector. The Hadley Group has sourced Metallic Coated Sheet mainly via imports. Impacts on the supply chain and end users, and anticipated reductions in import steel from China and the EU, should be considered.	<p>The TRA take note of this position. These factors were addressed under the transition review during UK production and Economic Interest Test stages in line with the requirements of the Safeguard Regulations 2019.</p> <p>These points do not influence either the passage of Category 4 through the assessment process set out in the Safeguard Regulations 2019 to conclude a TRQ is appropriate nor the resulting calculation based on the revised HMRC data.</p>

C2.3 Russia Government (foreign government)

	Comment	TRA consideration
1	The TRA should take into consideration problems that the UK downstream industries face due to the safeguard measure in place. The relief for the UK steel industry is created by the measures at the expense of their clients. A decision to decrease liberalisation would negatively affect steel market predictability with negative implications for downstream industries.	<p>These points do not influence either the passage of these categories through the assessment process set out in the Safeguard Regulations 2019 to conclude a TRQ is appropriate nor the resulting calculation based on the revised HMRC data.</p> <p>Interested parties may apply for a TRQ review if they have sufficient information that there has been a 'change in circumstances' such as a change in demand for the relevant goods or impact of the TRQ on traditional trade flows.</p>
2	There are no grounds to maintain the measure according to WTO rules because the TRA should have information that categories subject to the measure need it both individually (to defend UK producers of 4, 5, and 19 categories) and collectively.	The revised data has been passed through the assessment process set out in the Safeguard Regulations 2019 which result in conclusion that a TRQ is appropriate. The TRA position here is established in accordance with UK trade remedies legislation which is consistent with WTO rules.

C2.4 Black Country Consortium Ltd (contributor)

	Comment	TRA consideration
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1	<p>We disagree with the TRA's original recommendation to maintain the current steel safeguarding measures on Category 4 products. UK companies are essentially limited to importing category 4 products from outside the EU. Frequent quota exhaustion limits flexibility and certainty on import price and viability with implications for downstream users including major infrastructure projects. The West Midlands will be disproportionately affected by these impacts.</p> <p>Proposals include</p> <ul style="list-style-type: none"> - Reallocating quota volume away from the EU to mitigate quota exhaustion and resulting uncertainty. - A government and business taskforce on steel safeguards - a more holistic, organised, and long-term approach to steel quotas for more flexibility and to minimise disruption to downstream steel users - a collaborative steel supply plan 	<p>The TRA take note of this position. These points do not influence either the passage of Category 4 through the assessment process set out in the Safeguard Regulations 2019 to conclude a TRQ is appropriate nor the resulting calculation based on the revised HMRC data.</p>
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C2.5 Further points

	Comment	TRA consideration
1	<p>These quotas in place between 1 January 2021 to 30 June 2021 were based on the statistics from 2015-2017, which were significantly more incorrect than later years. A significant amount of duty was therefore incorrectly incurred during this six month period. The TRA should adjust the quotas from 1 January 2021.</p>	<p>The quotas in place before 1 July 2021 were not established in light of a TRA recommendation and so it would not be appropriate for the TRA to recommend changes.</p> <p>The mechanism by which retrospective corrections might be given effect and impacts on business are not within TRA powers and are not considered as part of this TRQ review or recommendation.</p>
2	<p>HMRC have confirmed that tables used as the basis for the TRQ proposals use the 'Country of Despatch' as the data point for the 'Country' column. The 'Country of Despatch' might not always correspond with the 'Country of Origin' of the material. Trade measures should be based on the 'Country of Origin'.</p>	<p>The TRA have adapted our recommendation to take account of the country of origin data where available.</p>
3	<p>No reasons have been given as to why the data set proposed to be considered now include five years (2015-2019) and not the same three years considered previously (2017-2019).</p>	<p>The TRA calculated TRQs are based on the 2017-2019 data throughout consistent with the transition review.</p> <p>The period of investigation (PoI) for this review was set as 2015-2019 to reflect that for certain TRQs the DIT dataset (2015-2017) forms the basis of the TRQ which TRA recommend carrying forward.</p>
4	<p>Extant TRQs should not be reduced on the grounds of corrections to the datasets used.</p>	<p>The TRA are rectifying TRQs which were based on incorrect information. As a matter of</p>

	There is no question of increasing an existing TRQ under the WTO Regime.	good administration public bodies should correct known errors. The TRA position here is established in accordance with UK trade remedies legislation which is consistent with WTO rules.
5	Traffic jams in maritime shipments have led to unstable logistics in international trade, and thus, it has been extremely challenging for exporters to correctly predict when they can next make shipments. To mitigate the risks of shipment arrivals after the quota runs out the TRA should consider making the quota management more flexible.	The TRA take note of this position. These points do not influence either the passage of Category 4 through the assessment process set out in the Safeguard Regulations 2019 to conclude a TRQ is appropriate nor the resulting calculation based on the revised HMRC data.

D TRA's Recommendation to the Secretary of State

54. The TRA recommend that TRQs should be revised.
55. Resulting TRQ allocations for product categories 4, 5, and 19 are shown in the Annex. TRQs should be varied consistent with these allocations from the day after the date of publication of the public notice giving effect to this Recommendation. If the public notice is not published before the beginning of the last day of the current quarter, it should not include any allocation for the current quarter.
56. We make this recommendation as a result of the change of circumstances set out in section B3 and our consideration of the facts summarised in section C.
57. This recommendation is materially changed from our [initial proposal](#) for this TRQ review.¹⁶ The changes result from use of the country of origin dataset in response to an interested party submission and also from the separate review of developing country exceptions and FTA exemptions (SM0016).
58. The varied measure should take effect on the day after the date of publication of any public notice made under section 13 of the Taxation (Cross-border Trade) Act 2018 giving effect to this recommendation and according to the TRQ periods set out in the Annex.
59. We do not recommend retroactive application of varied TRQs.

E Public interest considerations

60. The TRA has found no significant considerations to report relevant to the Secretary of State's decision as to whether it would not be in the public interest to accept the TRA's recommendation to revise the TRQs as set out in section D.

¹⁶ <https://www.trade-remedies.service.gov.uk/public/case/SM0015/submission/bcc7d021-8a85-45f7-8ad7-a35333178908/>

Annex Proposed Tariff Rate Quotas

Quarterly volumes of country and residual tariff-rate quotas (in tonnes) 01/07/2021 – 30/06/2022

Product category	Country	01/07/2021 to 30/09/2021	01/10/2021 to 31/12/2021	01/01/2022 to 31/03/2022	01/04/2022 to 30/06/2022
4	EU	296,350	296,350	289,908	293,129
	Taiwan	30,639	30,639	29,973	30,306
	India	22,628	22,628	22,136	22,382
	Turkey	22,565	22,565	22,074	22,319
	Residual	78,253	78,253	76,552	77,403
5	EU	33,537	33,537	32,808	33,172
	South Korea	13,628	13,628	13,332	13,480
	Residual	2,037	2,037	1,993	2,015
19	EU	4,386	4,386	4,290	4,338
	Residual	129	129	126	128

Quarterly volumes of country and residual tariff-rate quotas (in tonnes) year 2

Product category	Country	01/07/2022 to 30/09/2022	01/10/2022 to 31/12/2022	01/01/2023 to 31/03/2023	01/04/2023 to 30/06/2023
4	EU	305,241	305,241	298,605	301,923
	Taiwan	31,558	31,558	30,872	31,215
	India	23,307	23,307	22,801	23,054
	Turkey	23,242	23,242	22,736	22,989
	Residual	80,601	80,601	78,849	79,725
5	EU	34,543	34,543	33,792	34,167
	South Korea	14,037	14,037	13,732	13,884
	Residual	2,098	2,098	2,053	2,075
19	EU	4,517	4,517	4,419	4,468
	Residual	133	133	130	131

Quarterly volumes of country and residual tariff-rate quotas (in tonnes) year 3

Product category	Country	01/07/2023 to 30/09/2023	01/10/2023 to 31/12/2023	01/01/2024 to 31/03/2024	01/04/2024 to 30/06/2024
4	EU	313,539	313,539	310,131	310,131
	Taiwan	32,416	32,416	32,063	32,063
	India	23,941	23,941	23,681	23,681
	Turkey	23,873	23,873	23,614	23,614
	Residual	82,792	82,792	81,892	81,892
5	EU	35,482	35,482	35,096	35,096

	South Korea	14,419	14,419	14,262	14,262
	Residual	2,155	2,155	2,132	2,132
19	EU	4,640	4,640	4,590	4,590
	Residual	137	137	135	135