



Australian Government
Anti-Dumping Commission

Received:
26 June 2014

Application for the publication of

Dumping duties

GALVANISED STEEL

exported from

India and Vietnam

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May 2014

APPLICATION UNDER SECTION 269TB OF THE *CUSTOMS ACT 1901* FOR THE PUBLICATION OF DUMPING AND/OR COUNTERVAILING DUTY NOTICES

DECLARATION

I request, in accordance with Section 269TB of the Customs Act 1901, that the Minister publish in respect of goods the subject of this application:

- ☒ a dumping duty notice, or
- ☐ a countervailing duty notice, or
- ☐ a dumping and a countervailing duty notice

This application is made on behalf of the Australian industry producing like goods to the imported goods the subject of this application. The application is supported by Australian producers whose collective output comprises:

- 25% or more of the total Australian production of the like goods; and
- more than 50% of the total production of like goods by those Australian producers that have expressed either support for, or opposition to, this application.

I believe that the information contained in this application:

- provides reasonable grounds for the publication of the notice(s) requested; and
- is complete and correct.

Signature: 

Name: **Alan Gibbs**

Position: Development Manager – International Trade

Company: BlueScope Steel Limited

ABN: 16 0000 11 058

Date: 30 April 2014

IMPORTANT INFORMATION

Signature requirements

Where the application is made:

By a company - the application must be signed by a director, servant or agent acting with the authority of the body corporate.

By a joint venture - a director, servant, agent of each joint venturer must sign the application. Where a joint venturer is not a company, the principal of that joint venturer must sign the application form.

On behalf of a trust - a trustee of the trust must sign the application.

By a sole trader - the sole trader must sign the application.

In any other case - contact the Commission's Client support section for advice.

Assistance with the application

The Anti-Dumping Commission has published guidelines to assist applicants with the completion of this application. Please refer to the following guidelines for additional information on completing this application:

- *Instructions and Guidelines for applicants: Application for the publication of dumping and or countervailing duty notices*
- *Instructions and Guidelines for applicants: Examination of a formally lodged application*

The Commission's client support section can provide information about dumping and countervailing procedures and the information required by the application form. Contact the team on:

Phone: 1300 884 159

Fax: 1300 882 506

Email: clientsupport@adcommission.gov.au

Other information is available from the Commission's website at www.adcommission.gov.au.

Small and medium enterprises (i.e., those with up to 200 employees) may obtain assistance, at no charge, from the International Trade Remedies Adviser, employed by Australian Industry Group and funded by the Australian government. To access this service, visit www.aigroup.com.au/traderemedies or telephone (03) 9867 0267.

Important information

To initiate an investigation into dumping and/or subsidisation, the Commission must comply with Australia's international obligations and statutory standards. This form provides an applicant industry with a framework to present its case and will be used by the Commission to establish whether there are reasonable grounds to initiate an investigation. To assist consideration of the application it is therefore important that:

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- all relevant questions (particularly in Parts A and B) are answered; and
- information that is reasonably available be supplied.

The Commission does not require conclusive evidence to initiate an investigation, but any claims made should be reasonably based. An application will be improved by including supporting evidence and where the sources of evidence are identified. Simple assertion is inadequate to substantiate an application.

To facilitate compilation and analysis, the application form is structured in 3 parts:

1. **Part A** seeks information about the Australian industry. This data is used to assess claims of material injury due to dumping/subsidisation. Where an Australian industry comprises more than one company, each should separately prepare a response to Part A to protect commercial confidentiality.
2. **Part B** relates to evidence of dumping.
3. **Part C** is for supplementary information that may not be appropriate to all applications. However some questions in Part C may be essential for an application, for example, if action is sought against subsidisation.

All questions in Parts A and B must be answered, even if the answer is 'Not applicable' or 'None'. Where appropriate, applicants should provide a short explanation about why the requested data is not applicable. This will avoid the need for follow up questions by the Commission.

The application form requests data over several periods (P^1 , P^2 P^n) to evaluate industry trends and to correlate injury with dumped imports. The labels P^1 ... P^n are used for convenience in this application form. Lodged applications should identify the period relevant to the data. This form does not specify a minimum period for data provision. However, sufficient data must be provided to substantiate the claims made. If yearly data is provided, this would typically comprise a period of at least four years (for example the current financial year in addition to three prior years). Where information is supplied for a shorter period, applicants may consider the use of quarterly data. Data must also be sufficiently recent to demonstrate that the claims made are current.

When an investigation is initiated, the Commission will verify the claims made in the application. A verification visit to the Australian industry usually takes several days.

Applicant companies should be prepared to substantiate all Australian industry financial and commercial information submitted in the application. Any worksheets used in preparing the application should therefore be retained to facilitate verification.

During the verification visit, the Commission will examine company records and obtain copies of documents relating to the manufacture and sale of the goods.

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Appendices	<p>Some questions require attachments to be provided. The attachment numbering sequence should refer to the question answered. For example, question A2.2 requests a copy of an organisation chart. To facilitate reference, the chart should be labelled <u>Attachment A2.2</u>. If a second organisation chart is provided in response to the same question, it should be labelled <u>Attachment A2.2.2</u> (the first would be labelled <u>Attachment A2.2.1</u>).</p>
Provision of data	<p>Industry financial data must, wherever possible, be submitted in an electronic format.</p> <ul style="list-style-type: none">• The data should be submitted on a media format compatible with Microsoft Windows.• Microsoft Excel, or an Excel compatible format, is required.• If the data cannot be presented electronically please contact the Commission's client support section for advice.
Lodgement of the application	<p>This application, together with the supporting evidence, should be lodged with:</p> <p style="padding-left: 40px;">The National Manager - Operations Anti-Dumping Commission Customs House 1010 Latrobe St Docklands VIC 3008</p> <p style="padding-left: 40px;">or</p> <p style="padding-left: 40px;">Sent by facsimile to 1300 882 506</p>
Public Record	<p>During an investigation all interested parties are given the opportunity to defend their interests, by making a submission. The Commission maintains a public record of these submissions. The public record is available on the Commission's website at www.adcommission.gov.au.</p> <p>At the time of making the application both a confidential version (for official use only) and non-confidential version (public record) of the application <u>must</u> be submitted. Please ensure each page of the application is clearly marked "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD". The non-confidential application should enable a reasonable understanding of the substance of the information submitted in confidence, clearly showing the reasons for seeking the conduct of a dumping and/or subsidy investigation, or, if those reasons cannot be summarised, a statement of reasons why summarisation is not possible. If you cannot provide a non-confidential version, contact the Commission's client support section for advice.</p>

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PART A

INJURY

TO AN AUSTRALIAN INDUSTRY

IMPORTANT

All questions in Part A should be answered even if the answer is 'Not applicable' or 'None'. If an Australian industry comprises more than one company/entity, each should separately complete Part A.

For advice about completing this part please contact the Commission's client support section on:

Phone: 1300 884 159
Fax: 1300 882 506
Email: clientsupport@adcommission.gov.au

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A-1 Identity and communication.

Please nominate a person in your company for contact about the application:

This application is made on behalf of BlueScope Steel Limited ("BlueScope") the sole Australian manufacturer of galvanised steel products.

Relevant contact details for personnel within BlueScope that will assist with enquiries concerning this application are as follows:

Contact Name:	Alan Gibbs
Company and position:	Development Manager – International Trade
Address:	Five Islands Road, Port Kembla, NSW 2500
Telephone:	(02) 4275 3859
Facsimile:	(02) 4275 7810
E-mail address:	Alan.Gibbs@bluescopesteel.com
ABN:	16 000 011 058

Alternative contact

Name:	Chad Uphill
Position in company:	Senior Finance Analyst– International Trade
Address:	Five Islands Road, Port Kembla, NSW 2500
Telephone:	(02) 4275 4638
Facsimile:	(02) 4275 7810
E-mail address:	Chad.Uphill@bluescopesteel.com

If you have appointed a representative to assist with your application, provide the following details and complete Appendix A8 (Representation).

Name:	Mr John O'Connor
Business name:	John O'Connor & Associates Pty Ltd
Address:	P.O. Box 329, Coorparoo Qld 4151
Telephone:	(07) 3342 1921
Facsimile:	(07) 3342 1931
E-mail address:	jmoconnor@optusnet.com.au
ABN:	39 098 650 241

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A-2 Company information.

1. **State the legal name of your business and its type (eg. company, partnership, sole trader, joint venture). Please provide details of any other business names you use to manufacture/produce/sell the goods that are the subject of your application.**

The company seeking the imposition of anti-dumping measures is BlueScope Steel Limited (ABN 16 000 011 058).

BlueScope Steel Limited (hereafter referred to as “BlueScope”) is an Australian manufacturer of flat steel products. BlueScope produces the goods that are the subject of this application which is zinc coated steel that is marketed under the following trade names “GALVABOND®”, “ZINCFORM®” “GALVASPAN®”, “ZINCHITEN®” and “ZINCANNEAL” steel. These products are sold into the Australian market direct to manufacturing customers and via distributors.

2. **Provide your company’s internal organisation chart. Describe the functions performed by each group within the organisation.**

An internal group organisation chart for BlueScope is set out below (as at end March 2014):



Functions performed by each group within the organization.

1. *Coated & Industrial Products Australia*

- Largest supplier and only manufacturer of HRC, plate, metal coated and painted steel in Australia (including the goods under consideration “GUC”);
- Australian finished-product capacity of ~2.5Mtpa; domestic market 1.8Mt in FY2013

2. *Building Components and Distribution Australia*

- Major steel product supplier / distributor to the Australian building and construction, automotive, white goods manufacturing and general manufacturing industries

3. *New Zealand & Pacific Steel Products*

- Only fully integrated flat steel maker in New Zealand
- Includes iron sands mines (own consumption and export sales)

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4. Building Products ASEAN, North America and India

- Operates metallic coating and painting lines and roll-forming in Indonesia, Malaysia, Thailand, Vietnam, India and North America
- Includes NS BlueScope Coated Products JV

5. Global Building Solutions

- Leading global designer and manufacturer of Engineered Building Solutions
- Key markets in China & Nth America; plants in ASEAN, India, Middle East
- Supplying buildings to global customers
- China coating & painting

6. Hot Rolled Products North America

- 2.0Mtpa mini-mill in Ohio
- 50/50 JV with Cargill Inc.

3. List the major shareholders of your company. Provide the shareholding percentages for joint owners and/or major shareholders.

BlueScope Steel Limited is a publicly listed company. The Major (Top 20) shareholders within BlueScope as at end March 2014 include:

FILTER					
TOP HOLDERS 1 TO 20 OF 20					
Rank	Details	Name	A/C Designation	24 Mar 14	% IC
1		NATIONAL NOMINEES LIMITED		105,063,986	18.80%
2		HSBC CUSTODY NOMINEES (AUSTRALIA) LIMITED		102,952,098	18.43%
3		CMICORP NOMINEES PTY LIMITED		62,188,723	11.13%
4		J P MORGAN NOMINEES AUSTRALIA LIMITED		56,960,487	10.19%
5		CMICORP NOMINEES PTY LIMITED	<COLONIAL FIRST STATE INV A/C>	55,973,084	10.02%
6		BNP PARIBAS NOMS PTY LTD	<DRP>	28,114,598	5.03%
7		JP MORGAN NOMINEES AUSTRALIA LIMITED	<CASH INCOME A/C>	10,620,615	1.90%
8		AMP LIFE LIMITED		7,841,872	1.40%
9		HSBC CUSTODY NOMINEES (AUSTRALIA) LIMITED	<NT-COMNWLTH SUPER CORP A/C>	3,538,667	0.63%
10		BNP PARIBAS NOMINEES PTY LTD	<AGENCY LENDING DRP A/C>	2,221,058	0.40%
11		UBS NOMINEES PTY LTD		1,995,000	0.36%
12		QIC LIMITED		1,984,131	0.36%
13		PACIFIC CUSTODIANS PTY LIMITED	BSL PLANS CTRL	1,657,351	0.30%
14		NATIONAL NOMINEES LIMITED	<N A/C>	1,621,200	0.29%
15		SHARE DIRECT NOMINEES PTY LTD	<10026 A/C>	1,448,876	0.26%
16		BLUESCOPE STEEL EMPLOYEE SHARE PLAN PTY LTD		1,067,972	0.19%
17		MIRRABOOKA INVESTMENTS LIMITED		750,000	0.13%
18		HSBC CUSTODY NOMINEES (AUSTRALIA) LIMITED-GSCO ECA		553,744	0.10%
19		INVIA CUSTODIAN PTY LIMITED	<GSJBW MANAGED A/C>	527,107	0.09%
20		BOND STREET CUSTODIANS LIMITED	<PURE INDEXED EQUITIES A/C>	524,837	0.09%
		TOTAL		447,605,406	80.11%
		Balance of Register		111,128,322	19.89%
		Grand TOTAL		558,733,728	100.00%

4. If your company is a subsidiary of another company list the major shareholders of that company.

BlueScope is not a subsidiary of another company.

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5. **If your parent company is a subsidiary of another company, list the major shareholders of that company.**

This question is not applicable to BlueScope.

6. **Provide an outline diagram showing major associated or affiliated companies and your company's place within that structure (include the ABNs of each company).**

Major Associated or affiliated companies

BlueScope is a publicly listed company, limited by shares. It has a number of subsidiaries and joint ventures both in Australia and overseas, which are included in Confidential Attachment A-2.6.1-4. A detailed listing of BlueScope's subsidiaries is also located in its Annual Full Financial Report, including the level of equity holding in each subsidiary company.

7. **Are any management fees/corporate allocations charged to your company by your parent or related company?**

This question is not applicable to BlueScope.

8. **Identify and provide details of any relationship you have with an exporter to Australia or Australian importer of the goods.**

BlueScope does not have a relationship with any exporter to Australia of the goods the subject of this application. BlueScope does have an arms length relationship with importers of these goods – namely Amity Pacific, CMC, Croft Steel, Empire Resources, Garmco, GS Global, Minmetals, Okaya, Sanwa, Stemcor, Thyssen Krupp Mannex (TKM), Toyota Tsusho and Wright Steel.

9. **Provide a copy of all annual reports applicable to the data supplied in appendix A3 (Sales Turnover). Any relevant brochures or pamphlets on your business activities should also be supplied.**

BlueScope's 2013 Annual Report and Full Financials are included with this application. BlueScope's Annual Reports from 2003 to 2013 are available from its website at www.bluescopesteel.com.

The 2014 Annual Report and Full Financials will be available from Mid-September 2014.

10. **Provide details of any relevant industry association.**

BlueScope is a member of the following industry associations:

- Australian Steel Institute – refer www.steel.org.au.
- Bureau of Steel Manufacturers of Australia (BOSMA)

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A-3 The imported and locally produced goods.

1. Fully describe the imported product(s) the subject of your application:
- Include physical, technical or other properties.
 - Where the application covers a range of products, list this information for each make and model in the range.
 - Supply technical documentation where appropriate.

Goods description

The imported goods the subject to this application are described as:

“flat rolled iron or steel products (whether or not containing alloys) that are plated or coated with zinc exported to Australia from India and Vietnam”

These goods are generically called galvanized steel. Galvanised steel of any width is included in this application.

Exclusions

These goods do not include painted galvanised steel, pre-painted galvanised steel, electro-galvanised steel, corrugated galvanised steel or aluminium zinc alloy coated or plated steel.

Additional Information.

The goods include the same categories of goods as identified in Trade Measures Report No. 190 and 193, however, this application also includes goods that are alloyed (i.e. with minor additions, e.g. boron, chromium, etc). The goods the subject of this application include all zinc coated product options, including all grades/models of zinc coated steel, all coating mass classes and all surface treatments.

Trade or further generic names often used to describe these Goods include:

- “GALVABOND®” steel
- “ZINCFORM®” steel
- “GALVASPAN®” steel
- “ZINCHITEN®” steel
- “ZINCANNEAL” steel
- “ZINCSEAL” steel
- Galv
- GI
- Hot Dip Zinc coated steel
- Hot Dip Zinc/Iron alloy coated steel
- Galvanneal

The amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m²) with the prefix being Z (Zinc) or ZF (Zinc converted to a Zinc/Iron alloy coating). The common coating masses used for zinc coating are: Z350, Z275, Z200/Z180, Z100, and for zinc/iron alloy coatings are ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.

Surface treatments can include but not be limited to; passivated or not passivated (often referred to as chromated or unchromated), oiled or not oiled, skin passed or not skin passed, phosphated or not phosphated (for zinc iron alloy coated steel only).

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There are a number of relevant International Standards for zinc coated products that cover their own range of products via specific grade designations, including the recommended or guaranteed properties of each of these product grades.

These relevant standards are noted below in Table A-3.1 “Relevant International Standards for zinc coated steel”.

Table A-3.1 - Relevant International Standards for zinc coated steel

International Standards	Product Grade Names
General and Commercial Grades	
AS/NZS 1397	G1, G2
ASTM A 653/A 653M	CS type A, B and C
EN10346	DX51D, DX52D
JIS 3302	SGCC, SGHC
Forming, Pressing & Drawing Grades	
AS/NZS 1397	G3
ASTM A 653/A 653M	FS, DS type A and B
EN10346	DX53D, DX54D
JIS 3302	SGCD, SGCDL,
Structural Grades	
AS/NZS 1397	G250, G300, G350, G450, G500, G550
ASTM A 653/A 653M	33 (230), 37 (255), 40 (275), 50 (340), 55 (380), 80 (550)
EN10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD
JIS 3302	SGC340, SGC400, SGC440, SGC490, SGC570 SGH340, SGH400, SGH440, SGH490, SGH570

Please refer to Non-Confidential Attachment A-3.1 for a comparison of AS/NZ 1397 with other International Standards for zinc coated steel.

2. What is the tariff classification and statistical code of the imported goods.

The GUC are classified within tariff sub-headings 7210.49.00 (statistical codes 55, 56, 57 and 58), 7212.30.00 (statistical codes 61), 7225.92.00 (statistical code 38), 7226.99.00 (statistical code 71). In particular, the GUC are zinc coated sheets and coils, of widths < 600mm and widths of =>600m.

The GUC attract the following rates of duty:

- India – zero per cent (a DCS country); and
- Vietnam – zero per cent (a DCS country).

Please refer to Non-Confidential Attachment A-3.2 for a copy of the Customs Tariff Schedule 3 extract.

BlueScope highlights with the Anti-Dumping Commission (“the Commission”) that published Australian Bureau of Statistics (“ABS”) import clearance data for the GUC do not disclose “country of import” details due to current suppression orders. BlueScope has therefore relied upon export data from the nominated countries to determine volumes of the GUC. Please refer to Section B-1.2 below for further information concerning source data for exports of the GUC to Australia.

3. Fully describe your product(s) that are ‘like’ to the imported product:

- Include physical, technical or other properties.
- Where the application covers a range of products, list this information for each

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- **make and model in the range.**
- **Supply technical documentation where appropriate.**
- **Indicate which of your product types or models are comparable to each of the imported product types or models. If appropriate, the comparison can be done in a table.**

Like Goods

BlueScope manufactures flat rolled products of iron and non-alloy steel, of widths less than 600mm and widths equal to or greater than 600mm, plated or coated with zinc.

The locally produced GUC are like product to the imported flat rolled products of iron or steel, plated or coated with zinc.

Physical properties

The zinc coated steel manufactured by BlueScope is coiled for supply to customers and may later be cut into sheets for sale to manufacturers, or slit into narrower widths.

The most common coating mass for zinc coated steel is Z275 (275 grams of zinc coating metal per square meter). Other coatings may include Z350, Z200/Z180 and Z100.

The most common coating mass for zinc/iron alloy coated steel is ZF100 (100 grams of zinc/iron alloy coating metal per square meter). Other coatings may include ZF80 and ZF30.

The steel chemistry, percent cold reduction, annealing oven temperature, and line speeds are used to produce the required mechanical property (structural) grades, as designated by Australian and International Standards.

Typically each Australian and International Standard has a range of steel grades nominated as Commercial, Formable or Structural grades. The commercial/formable grades are those with mechanical properties suitable for general pressing and forming whereas the structural grades are those with guaranteed minimum properties that structural engineers utilize in the design of their final product designs.

Other alloy zinc coated products are wholly substitutable with iron and non-alloy zinc coated steel products.

The locally produced GUC have widths greater than 600mm and less than 600mm, with product thicknesses in the range of 0.30 mm BMT to 3.5 mm BMT (BMT = Base Metal Thickness and represents the steel thickness without the metallic coating).

Copies of BlueScope's Product Brochures for the range of Galvanised steel products are included at Non-Confidential Attachments A-3.3.1 to A 3.3.6.

More information can be found at
<http://steelproducts.bluescopesteel.com.au/home/steel-products/metallic-coated-steel>

4. Describe the ways in which the essential characteristics of the imported goods are alike to the goods produced by the Australian industry.

BlueScope submits that the GUC manufactured in Australia by BlueScope are like goods to the imported goods on the following grounds:

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(i) *Physical likeness*

- Products made locally by BlueScope have a physical likeness to the goods exported from India and Vietnam (the countries under reference);
- BlueScope's locally produced Galvanised Steel and the imported goods are manufactured to Australian and International Standards;

(ii) *Commercial likeness*

- Australian industry galvanised steel competes directly with imported galvanised steel in the Australian market;
- The locally produced goods and the imported goods are offered for sale to the market via similar channels and on similar commercial terms and conditions,

(iii) *Functional likeness*

- Both the locally produced and imported galvanised steel have comparable or identical end-uses;

(iv) *Production likeness*

- Locally produced and imported galvanised steel are manufactured in a similar manner and via similar production processes.

On this basis, BlueScope considers its locally-produced galvanised steel is "alike" to the imported goods, and possesses the same essential characteristics as the imported galvanised steel.

5. What is the Australian and New Zealand Standard Industrial Classification Code (ANZSIC) applicable to your product.

The ANZSIC code applicable to zinc coated steel is category 2110.

6. Provide a summary and a diagram of your production process.

Summary of manufacturing process

The input steel product is slab.

Slab is heated in a furnace to around 1200 degrees Celsius then reduced in thickness from 230mm to below 5mm by passing through a series of rollers at great pressure, is then control cooled, and finally wound up as a coil of steel (now known as hot rolled coil ("HRC")).

The HRC is then further processed by passing through hydrochloric acid baths to remove surface scale. It is then edge trimmed to the customer-specified width.

The next process is cold rolling, which is a similar process to hot rolling but is done at ambient temperature. This is where the coil is reduced in thickness to the customer requirement, generally 0.30 to 1.6mm BMT.

This cold rolled steel coil is the input feed material to the continuous coating line and runs continuously through several key processes:

1. The first step is cleaning.
2. This is followed by an annealing process, before it passes through a molten bath mixture of zinc, antimony and other trace metals.

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3. Once coated, the product can then receive various surface treatments depending on the customer's specific requirements.

The range of options for zinc coated steel include a "Skin Passed" or "un-Skin Passed" surface, chromated or un-chromated surface" or an "oiled surface" or "dry surface. For zinc/iron alloy coated steel the option is for a "Skin Passed" or "un-Skin Passed surface.

The diagram below reflects a zinc galvanizing coating process. The zinc/iron (ZF) coating process is the same as zinc coating process except that instead of the zinc coating solidifying onto the steel, it is passed through a furnace to fuse the zinc coating with iron from the steel, to make a matt finish that is designed as a surface ready to paint.

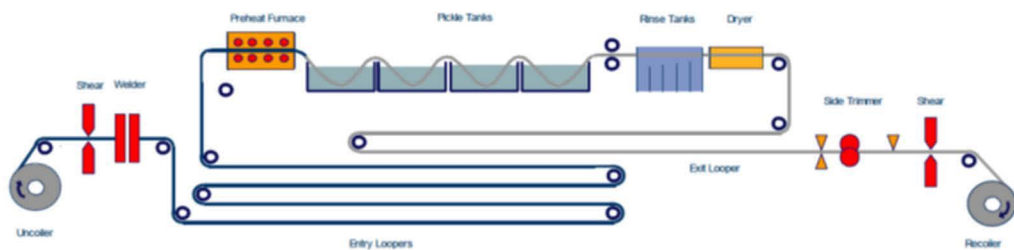
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Diagrammatic representation of Slab conversion to Zinc coated (Galvanised) steel

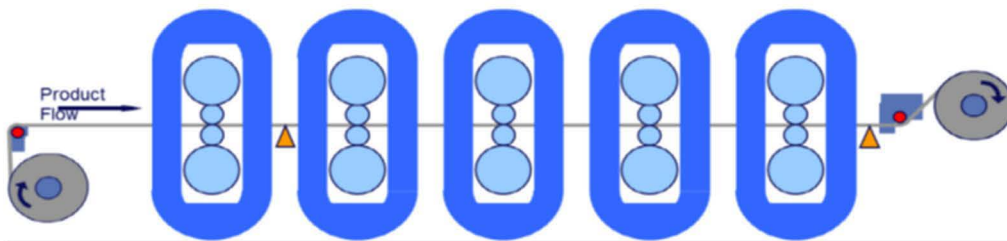
Slab is converted to Hot Roll Coil (HRC) at the Hot Strip Mill



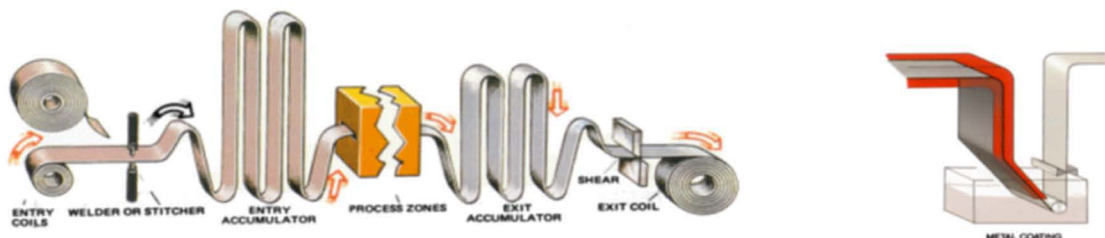
HRC has its surface scale removed and is side trimmed Hot Roll Coil at the Pickle line



Pickled and sidetrimmed HRC is then cold reduced in thickness to customer requirement



The Cold Rolled coil is then cleaned, annealed and hot dip coated with zinc



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- 7. If your product is manufactured from both Australian and imported inputs:**
- **describe the use of the imported inputs; and**
 - **identify that at least one substantial process of manufacture occurs in Australia (for example by reference to the value added, complexity of process, or investment in capital).**

BlueScope manufactures hot rolled coil in Australia from liquid steel, via flat steel production. The steel production process is a capital intensive one that converts raw material iron ore and coal into liquid steel, followed by casting into slab steel that is then converted into hot rolled coil. BlueScope manufactures zinc coated steel from cold rolled coil that is transformed from hot rolled coil.

BlueScope is a fully-integrated flat steel product manufacturer with large capital intensive manufacturing operations at Springhill and Port Kembla in NSW, and Western Port in Victoria.

BlueScope submits that it undertakes more than one substantial process of manufacture in the production of the GUC.

BlueScope does not use imported steel in the manufacture of the GUC.

- 8. If your product is a processed agricultural good, you may need to complete Part C-3 (close processed agricultural goods).**

The GUC are not close processed agricultural goods.

- 9. Supply a list of the names and contact details of all other Australian producers of the product.**

BlueScope is the sole Australian manufacturer of the goods the subject of this application.

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A-4 The Australian market.

1. Describe the end uses of both your product and the imported goods.

Trade Measures Report No. 190 ("Report No. 190") dated 30 April 2013 noted that galvanised steel was sold into the "building and construction, manufacturing, automotive and transport primary market sectors".

Report No. 190 identified applications for galvanised steel:

"In the building and construction industry examples of end-use applications for galvanised steel include: commercial and industrial buildings light structural sections (purlins and girts); structural sections for carports, sheds and garages, plastering and ceiling accessories; garage door tracks; structural nail-plates, post stirrups, frame connectors and bracing for timber frames.

In the manufacturing industry examples of end use applications for galvanised steel include: feedstock as input for pipe and tube manufacture; air-conditioning ducting; cable trays; components in domestic appliances; hot water system components; electrical meter cabinets; tool-boxes; meter boxes; grain silo components and general manufactured articles.

Galvanised steel is supplied to automotive component (i.e. brake parts) and Original Equipment Manufacturer ("OEM") automotive markets."

The then Customs and Border Protection further observed that the size of the Australian market for galvanised steel in 2011/12 was approximately 630,000 metric tonnes. BlueScope considers that the Australian market in 2013/14 remains at a similar level to 2011/12.

BlueScope agrees with the assessment of Customs and Border protection concerning end-use applications for galvanised steel. BlueScope's galvanised steel is sold into the markets and end-use applications nominated in Table A-4.1 below.

Table A-4.1 – Primary end-use applications

Product	Primary end use markets	Applications
Galvanised products	Building and construction, manufacturing, automotive and transport	General manufacturing, automotive, structural sections for commercial and industrial buildings and structural decking

The locally produced and imported goods are used interchangeably across a variety of applications in the Australian market, including the main end-use applications identified in Table A-4.1 above. The key Australian market segments include the "building and construction industry" and the "manufacturing industry".

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2. Generally describe the Australian market for the Australian and imported product and the conditions of competition within the overall market. Your description could include information about:

- **sources of product demand;**
- **marketing and distribution arrangements;**
- **typical customers/users/consumers of the product;**
- **the presence of market segmentation, such as geographic or product segmentation;**
- **causes of demand variability, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;**
- **the way in which the imported and Australian product compete; and**
- **any other factors influencing the market.**

Market Segmentation

The Australian market for galvanised steel products is made up of two key market segments, namely the building and construction industry segment (largest consumer by volume) and the smaller manufacturing industry segment. These are expanded on below:

(i) Sources of demand

Key sources of demand in the Australian market for the goods include:

- Building & Construction Industry Segment both into residential and non-residential end uses. End-uses include purlins and girts, framing, structural decking (flooring systems), air-conditioning ductwork, plaster accessories, nail plate etc.
- Manufacturing includes feed stock as input for pipe & tube manufacture, automotive components, racking systems, meter boxes, silo components etc.

(ii) Distribution arrangements

Approximately [%] of galvanised steel sales are made directly to the domestic building product manufacturing industry. It is this domestic building product manufacturing industry that roll forms the galvanised steel into building products such as structural sections for commercial buildings and garages/sheds as well as decking (flooring systems) etc. The building product manufacturers then distribute the manufactured products to builders etc.

The balance of sales of the GUC is made to either the local distribution market (via distributor/resellers such as [Customers]), or direct to the general manufacturing and auto industries including OEM auto and auto component manufacturers, pipe and tube manufacturers and racking manufacturers.

Both BlueScope and importers of the GUC compete in all States and Territories in Australia and across each segment via the same distribution channels in order to sell product directly to the larger manufacturing companies in Australia, and to distributors/resellers that on-sell the product into the market.

Distributors and resellers may offer a range of services such as smaller parcels of product, along with credit facilities and further processing (such as sheeting, slitting and blanking, and the like).

(iii) Typical Customers

Within the Building and Construction industry BlueScope's major customers can be described as roll formers of structural framing/decking products, and include companies such as [Customers].

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Within the general manufacturing industry the major customers would include *[Customers]*.

(iv) Causes of demand variability

There are a variety of factors that influence demand variability for galvanised steel products within the Australian market, including:

Seasonal fluctuations

- Agriculture – e.g. silos depending on season;
- Building industry Christmas shutdown directly impacts construction;
- Wet versus dry season in tropical climates impact construction.

Factors contributing to overall market growth or decline

- Availability of capital for infrastructure spending – government and private;
- General macro-economic factors such as bank interest rates directly impact on investment decisions by home buyers, investors and developers; Global and domestic economic conditions (GDP, unemployment, inflation, interest rates);
- Global and domestic business and consumer confidence.

Government regulation

- Standards – international manufacturers do not always manufacture to the same standards as Australian manufacturers; this is commonly not understood until installation;
- Policy – major government spending on infrastructure such as the school building revolution;
- New home rebates can pull forward demand.

Developments in technology affecting either demand or production

- Not significant.

Short Term Pricing Volatility

- Pressure on Australian manufacturing to compete with imported finished products;
- Can influence purchasing decision on inventory levels;
- More evident in the indirect distribution channel;
- Influenced via global steel capacity utilisation;
- Has a seasonal element.

(v) The way in which the imported and Australian products compete

All customers have the opportunity to purchase imported material either:

- Direct from the overseas mill;
- via an international trader;
- via an aligned / non-aligned Australian based stockiest / reseller.

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3. Identify if there are any commercially significant market substitutes for the Australian and imported product.

The common significant market substitutes for both the Australian produced and imported goods fall into one of two categories, being “other coated steel substitutes” and “inter-material substitutes”.

Other coated steel substitutes include:

- 55% aluminium/zinc coated (also known as Aluzinc), 5% aluminium/zinc also known as Galfan® plus Zinc/Mg coated steel products (in some product applications); and
- Painted metallic coated steel substitutes. This could include painted versions of the products listed above.

Inter-material substitutes depend on end use and include:

- in framing applications in construction, there are substitute products such as timber in various forms, hot rolled structural sections, load bearing concrete panels, masonry and the like.
- in non-framing products for the building industry, plastic and composite materials could be used to replace some steel such as conduits, ceiling and plaster fittings/accessories;
- in automotive applications where substitution can be achieved the alternatives could be aluminium, plastics or advanced composites.

Despite the identified substitutes, galvanised steel is considered by end-users as a fit-for-purpose product that is better suited in the identified key applications to alternate substitutes due to its superior value proposition.

4. Complete appendix A1 (Australian production). This data is used to support your declaration at the beginning of this application.

BlueScope has completed Confidential Appendix A1 for the twelve months to 31 March 2014. Please refer to Confidential Appendix A1.

5. Complete appendix A2 (Australian market).

BlueScope has completed Confidential Appendix A2 for the period 2008/09 to 2013/14 (years ending March) inclusive. This annualised data does not align with the periods considered in Report No. 190 (Financial Years ending June), however, minimal differences are observed. Please refer to Confidential Appendix A2.

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6. Use the data from appendix A2 (Australian market) to complete this table:*Indexed table of sales quantities**

Financial Year	(a) Your Sales	(b) Other Aust ⁿ Sales	(c) Total Aust ⁿ Sales (a+b)	(d) Dumped Imports	(e) Other Imports	(f) Total Imports (d+e)	(g) Total Market (c+f)
2008/09	100	100	100	100	100	100	100
2009/10	88.67	100	88.67	1205.5	68.10	70.23	81.70
2010/11	95.52	100	95.52	203.24	92.97	93.17	94.63
2011/12	84.39	100	84.39	208.91	93.23	93.45	87.82
2012/13	83.58	100	83.58	812.35	100.48	101.82	90.48
2013/14	104.30	100	104.30	8457.82	51.06	66.81	90.12

Notes:

1. BlueScope is the sole Australian manufacturer of the GUC.
2. Financial year 2014 (year ending March) data is incomplete due to a lag in Country of Origin data supply.
3. Vietnam data not available from ABS (on a monthly basis) or from ISSB. Data obtained from ABS is on an 11 month basis, ending February 2014.
4. Exports from China, Korea and Taiwan included in exports for "Other" countries on the basis that following imposition of measures, goods are not at dumped prices.

The Table of indexed sales for the galvanised steel market in Australia demonstrates that, following the imposition of measures on galvanised steel exported from P R China, Korea and Taiwan in February 2013, a shift to exports sourced from India and Vietnam is observed. Whereas exports of galvanised steel from Korea have also continued subsequent to the imposition of measures, the FOB unit export prices for Korean exports appear to be at non-dumped levels.

At the time of BlueScope's application for measures on galvanised steel exported from P R China, Korea and Taiwan, exports from India and Vietnam were at negligible levels (i.e. at 890 and 175 tonnes respectively, when total exports to Australia were at 254,274 tonnes). Following the commencement of an investigation in October 2012, exports from India and Vietnam escalated to account for approximately 17 and 7 per cent of total exports of galvanised steel to Australia in 2013/14¹. BlueScope also notes that certain exports from Taiwan with boron included accounted for 4.6 per cent of total imports in 2013/14, with no exports from Taiwan including boron observable in prior years.

It is further noted that galvanised steel exports from other countries (mainly Japan and New Zealand) have also declined in 2013/14. Exports of galvanised steel from India and Vietnam, therefore, have increased at a time when exports from other countries and, the market overall, have decreased.

The escalation in exports from India and Vietnam has displaced the dumped and injurious exports to which measures were imposed in February 2013. This application for measures is targeted at the dumped and injurious exports of galvanised steel from India and Vietnam that are considered to be at dumped prices – See Section B-6 below.

¹¹ These numbers are conservative as all export data for India and Vietnam to 31 March 2014 was not available at time of lodgement of application.

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A-5 Applicant's sales.**1. Complete appendix A3 (sales turnover).**

BlueScope has completed Confidential Appendix A3 for the period July 2007 to 31 March 2014.

Indexed data from Confidential Appendix A3 for the Like Goods (quantity and value) has been included below.

2. Use the data from appendix A3 (sales turnover) to complete these tables.

BlueScope has completed the tables below from data included in its Confidential Appendix A3.

Indexed table of Applicant's sales quantities (metric tonnes) for like goods

Quantity	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Like goods						
Australian market	100	88.67	95.52	84.39	83.58	104.30
Export market	100	120.67	204.91	144.30	69.17	59.08
Total	100	93.91	113.41	94.19	81.23	96.90

Notes:

1. Refer to Confidential Appendix A3 for data.
2. Years are 1 April to 31 March.

Indexed table of Applicant's sales values for like goods

Quantity	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Like goods						
Australian market	100	72.46	79.04	69.61	61.45	79.57
Export market	100	86.71	164.70	117.52	46.42	43.15
Total	100	74.28	89.95	75.71	59.54	74.93

Notes:

1. Refer to Confidential Appendix A3 for data.
2. Years are 1 April to 31 March.

BlueScope's domestic sales of galvanised steel have recovered following the imposition of measures in February 2013. Whilst it is evident that a sales volume recovery has occurred in 2013/14, BlueScope's domestic sales revenues remained depressed/suppressed.

Indexed table of Applicant's sales quantities (metric tonnes) for All Products

Quantity	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
All Products						
Australian market	100	90.47	96.92	86.15	81.34	86.68
Export market	100	75.48	96.18	82.01	29.84	28.72
Total	100	86.43	96.72	85.03	67.45	71.05

Notes:

1. Refer to Confidential Appendix A3 for data.
2. Years are 1 April to 31 March.

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Indexed table of Applicant's sales values for All Products

Quantity	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
All Products						
Australian market	100	83.61	88.30	78.34	72.21	78.96
Export market	100	50.96	76.61	63.45	19.89	20.59
Total	100	76.51	85.76	75.10	60.83	66.23

Notes:

1. Refer to Confidential Appendix A3 for data.
2. Years are 1 April to 31 March.

BlueScope's improved volumes in 2013/14 have been aided by the anti-dumping measures applied on dumped (and subsidised) imports of galvanised steel from P R China, Korea and Taiwan. Domestic revenues in 2013/14 are at similar levels to 2011/12 due to price pressures from dumped exports that have displaced exports to which anti-dumping measures now apply.

3. Complete appendix A5 (sales of other production) if you have made any:

- internal transfers; or
- domestic sales of like goods that you have not produced, for example if you have imported the product or on-sold purchases from another Australian manufacturer.

Confidential Appendix A5 has been completed by BlueScope for sales of galvanised steel. Please refer Confidential Appendix A5.

4. Complete appendix A4 (domestic sales).

BlueScope has completed Confidential Appendix A4 for the twelve months to 31 March 2014. Please refer to confidential sales data provided by BlueScope on USB.

5. If any of the customers listed at appendix A4 (domestic sales) are associated with your business, provide details of the association. Describe the price effect of the association.

BlueScope sells the GUC through owned, related and unrelated parties in the Australian domestic market. Owned or related domestic customers for galvanised steel include *[related customers]*.

The mechanism for establishing prices to associated or related companies is the same as that for the broader customer base whereby net prices are set to meet import competition. From time to time owned or related parties may benefit from a nominally lower price (from *[XX%]* to *[XX%]* difference) than similar unrelated customers, due to the structure of the various rebate mechanisms.

6. Attach a copy of distributor or agency agreements/contracts.

BlueScope has supply agreements in place with many of its domestic customers which detail the terms of trade including supply arrangements, rebate structure, supply terms and conditions, etc.

A copy of a standard supply agreement is included at Confidential Attachments A-5.6.1.

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7. Provide copies of any price lists.

BlueScope has customer-specific price lists. This is due to the differing product purchase mix and differing service offers which exist across the customer base. Please find attached an example of a BlueScope customer price list at Confidential Attachment A-5.7.a and A5-7.b.

8. If any price reductions (for example commissions, discounts, rebates, allowances and credit notes) have been made on your Australian sales of like goods provide a description and explain the terms and conditions that must be met by the customer to qualify.

- Where the reduction is not identified on the sales invoice, explain how you calculated the amounts shown in appendix A4 (domestic sales).
- If you have issued credit notes (directly or indirectly) provide details if the credited amount has not been reported appendix A4 (domestic sales) as a discount or rebate.

BlueScope provides discounts and rebates for some sales identified in Confidential Appendix A4. Discounts and rebates are separately identified. There is a range of rebate mechanisms in place. For example, certain rebates are *[types of rebates]*. Discounts are available for early settlement of accounts.

9. Select two domestic sales in each quarter of the data supplied in appendix A4 (domestic sales). Provide a complete set of commercial documentation for these sales. Include, for example, purchase order, order acceptance, commercial invoice, discounts or rebates applicable, credit/debit notes, long or short term contract of sale, inland freight contract, and bank documentation showing proof of payment.

BlueScope has included two complete sets of commercial documentation for two customers in each of the four quarters to 31 March 2014. Please refer to Confidential Attachment A-5.9.1 – A-5.9.8 for BlueScope commercial documentation.

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A-6 General accounting/administration information.

1. Specify your accounting period.

BlueScope's financial year is 1 July to 30 June.

2. Provide details of the address(es) where your financial records are held.

BlueScope's financial records for the goods the subject of this application are located at its Five Islands Road, Port Kembla premises.

3. To the extent relevant to the application, please provide the following financial documents for the two most recently completed financial years plus any subsequent statements:

- **chart of accounts;**
BlueScope's Chart of Accounts has been provided electronically with this application.
- **audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);**
BlueScope's audited consolidated accounts are included in the company's annual report. These are available from BlueScope's website at www.bluescopesteel.com
- **internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods.**

These documents should relate to:

1. **the division or section/s of your business responsible for the production and sale of the goods covered by the application, and**
2. **the company overall.**

BlueScope has also included select monthly management report extracts at Confidential Attachment A-6.3.1 to A-6.3.2.

4. If your accounts are not audited, provide the unaudited financial statements for the two most recently completed financial years, together with your taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.

BlueScope's accounts are audited annually. This question is therefore not applicable.

5. If your accounting practices, or aspects of your practices, differ from Australian generally accepted accounting principles, provide details.

The accounting practices of BlueScope are maintained in accordance with Australia's generally accepted accounting principles.

6. Describe your accounting methodology, where applicable, for:

BlueScope's accounting methodology complies with the Australian Accounting Standards issued by the Australian Accounting Standards Board (AASB) and the International Financial Reporting

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Standards (IFRS) issued by the International Accounting Standards Board (IASB). Further detailed information can be sourced from BlueScope's full financial report that can be accessed on the internet at www.bluescopesteel.com

- **The recognition/timing of income, and the impact of discounts, rebates, sales returns warranty claims and intercompany transfers;**

Revenue is recognised by BlueScope when the significant risks and reward of the ownership of the goods have passed to the buyer. This is considered to have occurred when the legal title of the product is transferred to the customer and BlueScope is no longer responsible for the product. The point at which title is transferred is dependent upon the specific terms and conditions of the contract under the sale.

Sales discounts are recognised at invoice date. Rebates and warranty claims are provided for on a monthly basis. Sales returns are recognised once the goods have been receipted into BlueScope inventory.

- **provisions for bad or doubtful debts;**

Collectability of trade receivables are reviewed regularly. Debts that are known to be uncollectable are written off by reducing the carrying amount directly.

- **the accounting treatment of general expenses and/or interest and the extent to which these are allocated to the cost of goods;**

General expenses are allocated on an absorption cost basis.

- **costing methods (eg by tonnes, units, revenue, activity, direct costs etc) and allocation of costs shared with other goods or processes;**

BlueScope's mainstream costing system is designed to enable:

- Actual process costs to be reported monthly;
- Cost detail as low as the cost element level;
- Actual fully absorbed product cost per unit of output (e.g. per tonne) at a minimum of product group level. Where a standard costing system is adopted, standard product costs updated for significant changes in process cost are utilised;
- Product costs to be broken down into components such as feed, conversion costs, yield, depreciation, support costs, etc; as well as
- The distinguishing of the underlying behavior of costs (e.g. fixed, variable, cash, non-cash).

- **the method of valuation for inventories of raw material, work-in-process, and finished goods (eg FIFO, weighted average cost);**

Raw materials, work in progress and finished goods, are stated at the lower of cost and net realisable value.

- **valuation methods for scrap, by-products, or joint products;**

The lower of cost and net realisable value.

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- **valuation methods for damaged or sub-standard goods generated at the various stages of production;**

The lower of cost and net realisable value.

- **valuation and revaluation of fixed assets;**

Regular purchases and sales of financial assets are recognised on trade-date - the date on which BlueScope commits to purchase or sell the asset. Investments are initially recognised at fair value plus transaction costs for all financial assets not carried at fair value through profit or loss. Financial assets carried at fair value through profit or loss are initially recognised at fair value and transaction costs are expensed in profit or loss. Financial assets are derecognised when the rights to receive cash flows from the financial assets have expired or have been transferred and BlueScope has transferred substantially all the risks and rewards of ownership.

- **average useful life for each class of production equipment, the depreciation method and depreciation rate used for each;**

Depreciation on assets other than land is calculated on a straight-line basis to allocate their cost over their estimated useful lives. The estimated useful lives of property, plant and equipment are as follows:

Buildings - up to 40 years.

Plant, machinery and equipment – up to 40 years.

- **treatment of foreign exchange gains and losses arising from transactions and from the translation of balance sheet items; and**

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in the profit or loss, except when they are deferred in equity as qualifying cash flow hedges and qualifying net investment hedges or are attributable to part of the net investment in a foreign operation.

Translation differences on available-for-sale financial assets are included in equity until such time as the available-for-sale asset is sold and the translated amount is reported in the profit and loss.

- **restructuring costs, costs of plant closure, expenses for idle equipment and/or plant shut-downs.**

Liabilities arising directly from undertaking a restructuring program, defined as the closure of an operation, are recognised when a detailed plan of the restructuring activity has been developed and implementation of the restructuring program as planned has commenced.

7. If the accounting methods used by your company have changed over the period covered by your application please provide an explanation of the changes, the date of change, and the reasons.

The accounting and financial practices/principles of BlueScope complies with the Australian Accounting Standards issued by the Australian Accounting Standards Board (AASB) and the International Financial Reporting Standards (IFRS) issued by the International Accounting

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Standards Board (IASB).

BlueScope's 2013 Annual Report included a note in relation to new and amended standards adopted by the reporting group, namely:

- AASB 112 *Amendments to Australian Accounting Standards – Deferred Tax: Recovery of Underlying Assets; and*
- AASB 2011-9 *Amendments to Australian Accounting Standards – Presentation of Other Comprehensive Income*

Please refer to Note 1(a)(ii) of Summary of Significant Accounting Policies in the BlueScope 2013 Annual Report.

A-7 Cost information

1. Complete appendices A6.1 and A6.2 (cost to make and sell) for domestic and export sales.

BlueScope has completed Confidential Appendices A6.1 (for domestic sales) and A6.2 (for export sales). Please refer to Confidential Appendices A6.1 and A6.2.

A-8 Injury

The principal indicators of injury are prices, volumes and profit effects – although not all of these must be evident. For this application, profit refers to amounts earned. Profitability is the ratio of profit to sales revenue. Where injury is threatened, but has not yet occurred, refer to question C.2.

1. Estimate the date when the material injury from dumped imports commenced.

In August 2012, BlueScope made application for anti-dumping measures on exports of galvanised steel from P R China, Korea and Taiwan. The application also sought the imposition of countervailing measures on galvanised steel exported from P R China. Following investigation, provisional measures were applied to exports of galvanised steel from P R China, Korea, and Taiwan (with the exception of exports by Sheng Yu and Ta Fong). The then Customs and Border Protection determined that BlueScope had suffered material injury from dumped and subsidised exports of galvanised steel in the 2011/12 financial year.

Following the imposition of measures, exports of galvanised steel from India and Vietnam emerged. In 2011/12² exports from both countries were negligible. In 2012/13³ and 2013/14⁴ exports of galvanised steel (in aggregate) from India and Vietnam to Australia comprised 1.4 per cent and 24 per cent of total imports, respectively.

Material injury to the Australian industry from dumped exports from P R China, Korea and Taiwan commenced in 2010/11 and continued in 2011/12 as verified in the earlier anti-dumping investigation (Reports No. 190 and 193). It is BlueScope's position that material injury from dumped exports from India and Vietnam has displaced the injurious exports from P R China,

² All years referenced throughout Sections A-8 and A-9 are years ending March.

³ Year ending March.

⁴ Year ending March.

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Korea and Taiwan, resulting in a continuation of material injury to the Australian industry in 2013/14.

2. **Using the data from appendix A6 (cost to make and sell), complete the following tables for each model and grade of your production. Pⁿ is the most recent period.**

Index of production variations (metric tonnes)

Year	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Index	100	93.89	113.39	94.17	81.21	96.89

Notes:

1. Production rates based upon Appendix A6.1 and Appendix A6.2 data sourced from “Galvanised steel”.

BlueScope has experienced increased production of galvanised steel following the imposition of anti-dumping measures on exports from China, Korea and Taiwan in February 2013. BlueScope is not identifying reduced production volumes as an injury indicator – although the dumped exports from India and Vietnam could have been produced and supplied by BlueScope in the absence of dumping.

Index of cost variations (based on A\$ per metric tonne)

Year	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Index	100	82.78	83.67	86.05	86.04	82.47

Notes:

1. Unit cost variations based upon Appendix A6.1 data sourced from “Galvanised steel”.

In Report No. 190 Customs and Border Protection confirmed that the Australian industry manufacturing galvanised steel had experienced material injury in the 2011/12 financial year. BlueScope’s cost-to-make-and-sell (“CTM&S”) galvanised steel in 2013/14 has declined by approximately 3.5 percentage points since 2011/12, whereas, the average selling price has retreated by more than 6 percentage points, culminating in a further deterioration of profit since 2011/12.

BlueScope contends that the further decline in galvanised steel selling prices can be attributed to the Australian industry competing with dumped exports from India and Vietnam.

Index of price variations (based on A\$ per metric tonne)

Year	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Index	100	81.72	82.74	82.49	73.52	76.29

Notes:

1. Unit price variations based upon Appendix A6.1 data sourced from “Galvanised steel”.

The Australian industry’s selling prices for galvanised steel declined by 9 per cent in 2012/13 and remained at approximately 6 per cent below average 2011/12 selling prices.

The above selling price indices confirm that BlueScope has sustained further selling price reductions in 2012/13 and 2013/14 that have followed as a result of a “switch” in export supply to Australia predominantly from China to India and Vietnam.

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Index of profit variations (based on A\$ per metric tonne)

Year	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Index	100	-193.72	-179.86	-474.92	-1469.11	-761.80

Notes:

1. Profit variations are based upon unit profits for galvanised steel.

The Australian industry has experienced further price suppression since 2011/12. It is BlueScope's contention that the price suppression has been as a consequence of dumped exports from India and Vietnam.

The price suppression experienced by BlueScope has contributed to reductions in profit as assessed by Customs and Border protection for the 2011/12 financial year.

Index of Profitability variations (based on unit profit as a % of unit selling price)

Year	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Index	100	-237.06	-217.37	-575.75	-1998.30	-998.57

Notes:

1. Profitability variations are based upon profit as a percentage of selling prices.

BlueScope's profitability in 2012/13 and 2013/14 reflect the trends of unit profit – a deterioration in 2012/13, remaining at a level in 2013/14 that is substantially below the profitability achieved in 2011/12. It is indisputable that the Australian industry manufacturing galvanised steel has experienced additional material injury to that experienced in 2011/12, in each of the following years 2012/13 and 2013/14.

It is BlueScope's contention in this application that the material injury experienced by the Australian industry in 2012/13 and 2013/14 has been as a direct consequence of exports from India and Vietnam that have displaced galvanised exports from China.

3. Complete appendix A7 (other injury factors).*Index of Revenue variations (\$)*

Year	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Index	100	96.57	99.27	82.27	69.42	87.36

Notes:

1. Revenues sourced from Appendix A7 for like goods only.
2. Appendix A7 data presented on financial year basis.

The Australian industry's revenue declined in 2012/13 (due to the impact of dumped exports from P R China, Korea and Taiwan during the majority of the year prior to the imposition of measures) and has improved in 2013/14 as BlueScope has increased domestic sales quantities following the full impact of anti-dumping measures. Total domestic revenue in 2013/14 remains approximately 12 per cent below 2008/09 and 2009/10.

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Index of Employment numbers (number)

Year	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Index	100	93.86	96.49	80.70	71.49	78.51

Notes:

1. Employment numbers sourced from Appendix A7.
2. Appendix A7 data presented on a financial year basis.

The above indices for BlueScope's employment numbers directly involved in the manufacture of galvanised steel confirm that the company has experienced a reduction in employees subsequent to 2011/12, with numbers in 2013/14 remaining below the levels of 2011/12 (the investigation period in the inquiry involving galvanised steel exported from P R China, Korea and Taiwan).

Index of Capacity Utilisation (metric tonnes per annum)

Year	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Index	100	113.60	119.24	97.93	101.74	120.03

Notes:

1. Production data for both domestic and export, sourced from Appendix A7.
2. Appendix A7 data presented on a financial year basis.

BlueScope's actual production of galvanised steel is reflected by the above indices. In 2013/14, BlueScope experienced an increase in capacity utilisation due to the impact of anti-dumping measures on galvanised steel exports from P R China, Korea and Taiwan. In the absence of anti-dumping measures, it is considered that BlueScope would have experienced a decline in capacity utilisation.

Index of Return On Investment (return on assets employed)

BlueScope highlights with the Anti-Dumping Commission ("the Commission") that the deterioration in BlueScope's profit and profitability since 2011/12 has further reduced the return on investment for the galvanised steel business as well as impacting on the business' ability to attract funds for re-investment purposes. Supporting evidence on this indicator can be provided by BlueScope during the industry verification visit.

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A-9 Link between injury and dumped imports.

To establish grounds to initiate an investigation there must be evidence of a relationship between the injury and the alleged dumping. This section provides for an applicant to analyse the data provided in the application to establish this link. It is not necessary that injury be shown for each economic indicator.

1. Identify from the data at appendix A2 (Australian market) the influence of the volume of dumped imports on your quarterly sales volume and market share.

In August 2012, BlueScope made an application for anti-dumping duties in respect of galvanised zinc steel ("galvanised steel" or the "goods") exports from P R China, Korea and Taiwan, and an application for countervailing measures on exports from P R China. In February 2013, the then Customs and Border Protection Service published a preliminary affirmative determination ("PAD") and applied provisional measures on exports of galvanised steel from the nominated countries.

On 25 July 2013, a notice was published announcing the imposition of anti-dumping measures on exports from P R China, Korea and Taiwan (except for exports by Union Steel of Korea, Sheng Yu of Taiwan and Ta Fong of Taiwan). Subsidy measures were applied to exports of galvanised steel from China.

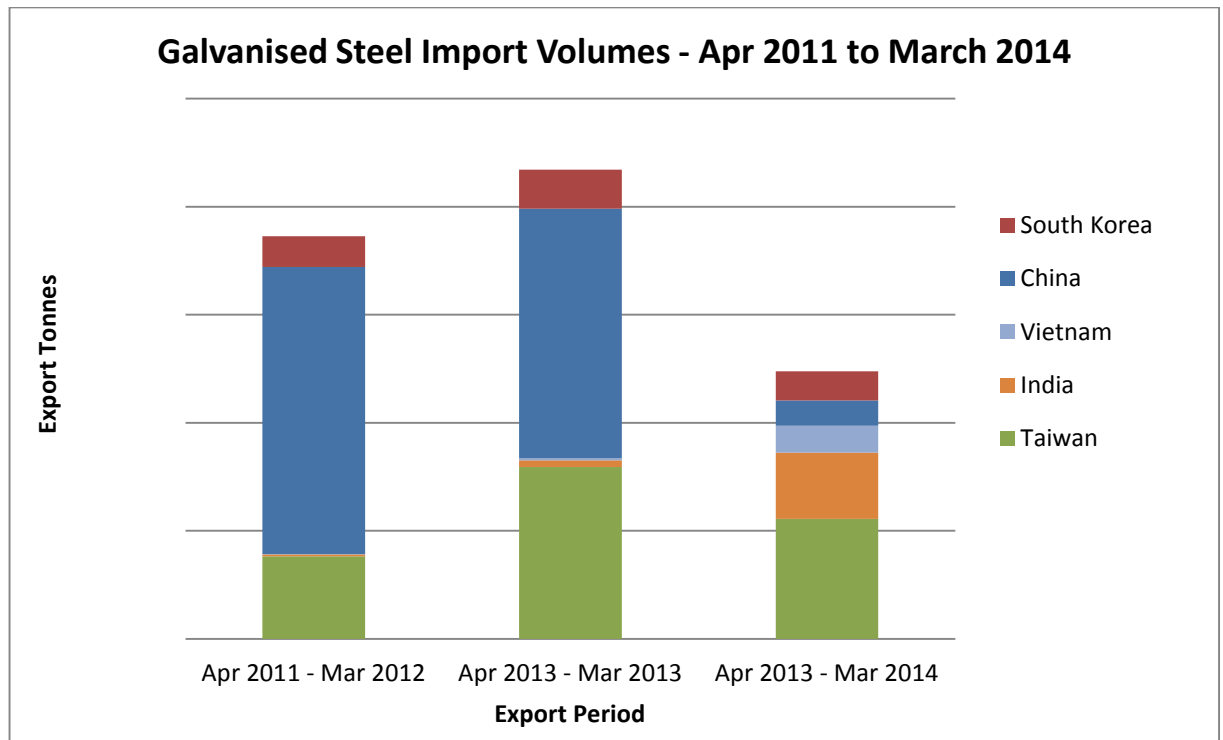
In 2011/12 (year ending 31 March 2012) galvanised steel exports to Australia from P R China, Korea and Taiwan totalled 193,901 tonnes, or approximately 76 per cent of total exports of galvanised steel to Australia. Exports from P R China alone accounted for approximately 52 per cent of total exports to Australia in 2011/12. In 2012/13, the exports from P R China, Korea and Taiwan totalled approximately 213,000 tonnes and accounted for 77 per cent of total exports of galvanised steel to Australia. Following the announcement of a formal investigation into BlueScope's application for measures on galvanised steel in October 2012, and the announcement of the PAD on 6 February 2013, there was a noticeable shift in exports from P R China, Korea and Taiwan, to exports from two new source countries – India and Vietnam. Some exports from Korea and Taiwan also continued.

The impact of the measures on galvanised steel exports to Australia in 2013/14 has diverted the sourcing behaviours of importers. A noticeable diversion from exports sourced from P R China is observable, and the unit values of exports from Korea have increased. Exports from Taiwan have continued, albeit at levels that are understood to be non-dumped.

As highlighted, in 2013/14 exports of galvanised steel from India and Vietnam have increased dramatically, to hold approximately 17 and 7 per cent of total export volumes to Australia. In the previous year, export volumes from both countries were minimal (i.e. 3164 tonnes ex India and 978 tonnes ex Vietnam). It is difficult to estimate the volume of exports of galvanised steel from Taiwan that may have been legitimately entered at non-dumped prices in 2013/14 of the total 47,135 tonnes exported to Australia. It would be expected, however, that the exports from Taiwan are at non-dumped levels (in the absence of information to the contrary).

The following graphic depiction of the shift in export supply of galvanised steel to Australia from the main source countries of P R China, Korea and Taiwan in 2011/12 to predominantly India, Vietnam and Taiwan in 2013/14 summarizes the grounds for this application for anti-dumping measures on galvanised exports from India, and Vietnam.

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The measures have assisted the Australian industry to recover lost sales volumes and market share. However, the recovered sales have been at selling prices that have had reduced margins to the margins achieved in 2011/12 - a year in which the then Customs and Border Protection Service determined the Australian industry had suffered material injury from dumping (and subsidisation). The level of profit achieved on the increased sales volume in 2013/14 is below the aggregate profit achieved in 2011/12 - that is, the Australian industry has experienced a deterioration of profit in 2012/13 and 2013/14 from the injurious levels confirmed in 2011/12.

BlueScope attributes this deterioration in profit to it having to compete with dumped exports of galvanised steel from India and Vietnam that have displaced export supply from P R China, Korea and Taiwan during 2013/14.

2. Use the data at appendix A2 (Australian market) to show the influence of the price of dumped imports on your quarterly prices, profits and profitability provided at appendix A6.1 (costs to make and sell). If appropriate, refer to any price undercutting and price depression evident in the market.

Report No. 190 confirmed that the Australian industry had suffered material injury in 2011/12 in the following forms:

- loss of sales volume;
- reduced market share;
- reduced sales revenues;
- price depression;
- price suppression;
- reduced profit and profitability;
- reduced return on investment;
- reduced production capacity; and
- reduced employment.

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This application demonstrates that in 2013/14 the Australian industry has recovered some lost sales volumes and market share since the imposition of measures (i.e. in February 2013), however, the recovered sales have been at reduced margins contributing to a further deterioration in profit and profitability to that established by the then Customs and Border Protection Service in 2011/12.

Exports of galvanised steel from India and Vietnam have emerged in 2013/14 above negligible levels and have undercut the Australian industry's selling prices. The price undercutting has resulted in price depression, price suppression and further impacts on profit and profitability.

BlueScope has included a copy of its Import Parity Pricing policy at Confidential Attachment A-9.1. A summary of all import competition offers for galvanised steel is included at Confidential Attachment A-9.2.2, with supporting confidential documentation at Confidential Attachment A-9.2.3

The following examples demonstrate price undercutting from the dumped exports and the Australian industry's response to the price offers. Supporting documentation for the following seven examples are included at Confidential Attachment A-9.2.4.1 to A-9.2.4.7.

Price Undercutting Example No. 1 – [Date]

BlueScope has included details of commercial negotiations with [customer]. [Date] BlueScope was unable to compete against an [exporter country] import offer on a [product description]. In [date] a further attempt to secure a [product description] was undertaken. This offer was made in line with the current IPP for [date] delivery. [Customer] advised that this offer was uncompetitive to [exporter country] steel offers they had received. BlueScope reduced the initial offer by a further [value], but were advised that this was still uncompetitive as [customer] had offers \$XX/tne to \$XX/tne ex [exporter country] below the BlueScope revised offer.

Summary documentation in support of the price negotiations with [customer] is included at Confidential Attachment A-9.2.4.2.

Price Undercutting Example No. 2 – [Date]

BlueScope has included details of commercial negotiations with one of its [customer].

On [date] BlueScope provided a [product description and customer/state] for steel sales over the [date]. This offer had a [commercial details, date and customer] advised of increased import competition in [product description] and the resultant sales volume reduction. BlueScope consequently reissued the [product description] offer for the [date] period, with a further reduction of \$XX/MT to enable [customer] to combat these low priced imports of [product description]. (A total discount of \$XXX/MT off the [product description] to try and retain share).

The competitive offers [region and exporter country] as the source country for imports.

Summary documentation in support of the price negotiations with [customer] and price support agreed are included at Confidential Attachment A-9.2.4.3.

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Price Undercutting Example No.3 - [Date]

BlueScope has included details of commercial negotiations with one of its [customer].

In [date] a parcel of pre-painted and galvanised steel was presented to BlueScope to offer pricing against imported benchmarks [product description and prices] - supplied by [customer]. The imported galvanised steel was sourced from [exporter country]. BlueScope could not offer to supply at these galvanised steel import prices, and as such declined to supply.

In [date], a further opportunity to supply [customer] was forwarded to BlueScope. BlueScope was able to offer and win the supply of this parcel of steel, but only after a discount of \$XX/MT - XX/MT lower than the [pricing strategy] import price at that time.

Summary documentation in support of the price negotiations with [customer] is included at Confidential Attachment A-9.2.4.4.

Price Undercutting Example No. 4 – [Date]

BlueScope has included details of commercial negotiations with one of its [customer].

[Strategic pricing process] Source countries identified include [exporter countries].

- The mills are not disclosed but based on [strategic pricing process] it is understood that they are skewed towards [exporter countries]. BSL review the [strategic pricing process]

Imported offers to [customer] have ranged between \$XX/MT to \$XX/MT lower than the BSL net selling price to [customer] over the [date] period. BlueScope [strategic pricing process] to secure the volume.

Summary documentation in support of the price negotiations with [customer] are included at Confidential Attachment A-9.2.4.5.

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Price Undercutting Example No. 5 – [Date]

BlueScope has included details of commercial negotiations with one of its [customer].

BlueScope steel positioned a [date] offer over a package of [product description and prices]. This offer was done at an overall price of \$AXXXX/MT based on the agreed [strategic pricing process]

[Product description, prices and customer] advised that a current [exporter country] steel maker's offer was much cheaper in the [product description]

As a result of this alternative import offer, BlueScope reduced its selling price for this package of steel products to \$AXXXX – a reduction of \$XX/MT.

This revised price reduced offer to [customer] was accepted and the order placed with BlueScope

Summary documentation in support of the price negotiations with [customer] are included at Confidential Attachment A-9.2.4.6.

Price Undercutting Example No.6 – [Date]

BlueScope has included details of commercial negotiations with one of its [customer].

[Customer] is a large ongoing consumer of galvanised steel from [customer and volume], however a recent monthly offer from [exporter country] saw the BlueScope [strategic pricing process] undercut further by up to \$AXX/MT. [Exporter country] was also identified as a source of supply to [customer]. BlueScope counter-offered with an overall \$AXX/MT price reduction for the [strategic offer description]. BlueScope subsequently secured only around XX% (XXX tonnes) of the monthly supply volume to [customer].

[Customer] is a smaller version of [customer] and is [strategic supply description].

An offer was made [date] at a XX% premium to a known [exporter] benchmark price for wide coil, however [customer] rejected this price offer as uncompetitive due to the ability to purchase imported product [product description, prices and customer] from BSL (at the above price) and then [process] and deliver to [customer].

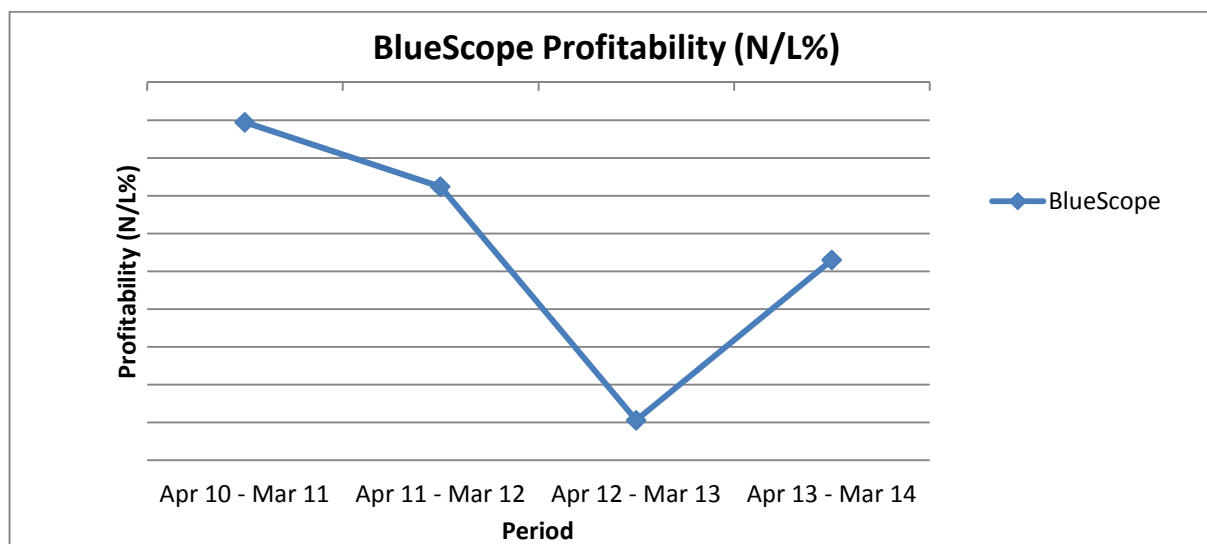
Summary documentation in support of the price negotiations with [customer] are included at Confidential Attachment A-9.2.4.7.

The above examples demonstrate BlueScope's response to competitive, dumped offers of galvanised steel, primarily sourced from India and Vietnam. BlueScope's selling prices to the nominated customers have been undercut by offers to supply dumped imported galvanised steel from new exporters not covered by measures in India and Vietnam. In the examples identified BlueScope has reduced its price to secure the volumes or, as advised by the customer, has lost the sale.

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As indicated, a summary of all price undercutting offers for supply from producers in India and Vietnam are included at Confidential Attachment A-9.2.2.

The Australian industry's selling prices declined in 2012/13, with a slight recovery in 2013/14 but still remained significantly below the selling prices of 2011/12. As a consequence of further price suppression in 2012/13 and 2013/14, the Australian industry's profit declined from the level of 2011/12 and in 2013/14 is below the profit achieved in 2011/12. BlueScope attributes the further price depression and price suppression experienced in 2013/14 to the impact of dumped exports from India and Vietnam.



3. Compare the data at appendix A2 (Australian market) to identify the influence of dumped imports on your quarterly costs to make and sell at appendix A6.1 (for example refer to changes in unit fixed costs or the ability to raise prices in response to material cost increases).

The Australian industry's cost-to-make-and-sell ("CTM&S") galvanised steel remained steady in 2012/13 (when compared with 2011/12) and declined marginally in 2013/14, primarily due to the increased production output achieved. The Australian industry's selling prices, however, declined by 11 per cent in 2012/13 and recovered only slightly in 2013/14. BlueScope's margin (i.e. difference between CTM&S and selling price) in 2013/14 had deteriorated from the level of 2011/12 where the Customs and Border Protection Service was satisfied that the Australian industry had suffered material damage.

The emergence of dumped exports of galvanised steel in 2013/14 has hindered the Australian industry's recovery from dumping. The Australian industry has been unable to raise prices to recover lost margins, due to price undercutting from dumped exports sourced from India and Vietnam.

It is recognised by BlueScope that the increased production volumes of galvanised steel following the imposition of measures (from February 2013) have aided in the reduction of production costs, although the reduced selling prices for dumped imports from the nominated source countries have suppressed the Australian industry's selling prices (and its ability to raise prices to recover lost margin).

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4. **The quantity and prices of dumped imported goods may affect various economic factors relevant to an Australian industry. These include, amongst other things, the return on investment in an industry, cash flow, the number of persons employed and their wages, the ability to raise capital, and the level of investment in the industry. Describe, as appropriate, the effect of dumped imports on these factors and where applicable use references to the data you have provided at appendix A7 (other economic factors). If factors other than those listed at appendix A7 (other economic factors) are relevant, include discussion of those in response to this question.**

It can be recalled from Report No. 190 where it was established that the Australian industry had experienced injury in the form of other economic indicators including reduced revenues, reduced return on investment ("ROI"), reduced production capacity, and reduced employment.

BlueScope has completed Confidential Appendix A7 identifying "other" injury indicators for the galvanised steel business. This data is prepared on BlueScope's financial year (i.e. year ending June). Data has been completed for the first half of BlueScope's 2014 financial year. The 2014 year indicates that as profit has declined, the return on investment in 2014 (half year report only) is likely to be well below the level of 2011/12 previously established by Customs and Border Protection.

In addition to the further deterioration of BlueScope's ROI in 2014, employment numbers have also declined further to be below the levels of 2011/12.

BlueScope would also highlight that the further deterioration of profit and profitability in 2013/14 impacts the ability of the business to attract capital for re-investment purposes. However, with the increase in domestic production and sales volumes, there is a prospect that, in the absence of dumped exports, a recovery from suppressed selling prices may be possible.

5. **Describe how the injury factors caused by dumping and suffered by the Australian industry are considered to be 'material'.**

The findings in Report No. 190 that the Australian industry had experienced *material* injury in 2011/12 is indicative that any further, subsequent deterioration of the Australian industry's profit would similarly be considered material. In 2011/12, the Australian industry had experienced a *loss* of [XXXX]. Before the measures imposed in February 2013 could have any material impact, a loss of [XXXX] was incurred (for twelve months ending March).

The improved production volumes have aided in a small reduction of the Australian industry's CTM&S in 2013/14, although the significant price reductions in 2012/13 have not been reversed and the industry's margin was further eroded. In the 2013/14 year, the industry's loss is at [XXXX], a further deterioration of the level of 2011/12 of [XX] per cent.

On this basis BlueScope submits that the injury experienced in 2013/14 due to the switching of supply sources by importers of galvanised steel to India and Vietnam is viewed as material and substantial, particularly when contrasted with the loss experienced in 2011/12 (Report No. 190's investigation period).

6. **Discuss factors other than dumped imports that may have caused injury to the industry. This may be relevant to the application in that an industry weakened by other events may be more susceptible to injury from dumping.**

The Australian galvanised steel market has remained stable in 2013/14, although it is slightly above

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the levels of 2011/12. The Australian industry has secured an increase in market share in 2013/14 following the imposition of measures in February 2013, and it was expected that this increase in production and local sales would displace further volumes. The emergence of dumped galvanised steel exports from India and Vietnam has stalled this expectation.

BlueScope would highlight with the Commission that it remains ready to supply increased demand in Australia, and can displace the dumped imports from India and Vietnam.

BlueScope considers that the only material factor impacting the Australian industry's ability to satisfactorily supply the local market is the increased availability of dumped galvanised steel from India and Vietnam. The depreciation of the Australian dollar throughout 2013/14 should have resulted in a natural shift away from imported goods. This has not been evident. The availability of the dumped exports from the nominated countries is the primary cause of material injury to the Australian industry in 2013/14.

7. This question is not mandatory, but may support your application. Where trends are evident in your estimate of the volume and prices of dumped imports, forecast their impact on your industry's economic condition. Use the data at appendix A2 (Australian market), appendix A6 (cost to make and sell), and appendix A7 (other economic factors) to support your analysis.

Following the imposition of measures in February 2013, it was BlueScope's expectation that it would be able to recover from the suppressed and depressed prices evident in 2011/12 that contributed to the significant loss occurred in that year. BlueScope does recognise that it has recovered some sales volumes post the imposition of measures, although there has been a deterioration of margin in 2013/14 when contrasted with 2011/12.

The expectation of recovery was short-lived. Importers commenced the sourcing of galvanised steel from countries (and exporters) not the subject of measures. The major suppliers to the Australian market following the imposition of measures have been producers in India and Vietnam.

The selling prices for the dumped galvanised exports from India and Vietnam have undercut the Australian industry's selling prices (refer Section A-9.2 above) requiring the Australian industry to reduce prices to hold volumes or lose sales.

It is BlueScope's contention that the "switch" to new supply sources for imported galvanised steel is consistent with the "country hopping" principles that result in the circumvention of measures.

This application details the material injury caused by importers seeking new sources of supply for galvanised steel to displace the previous exports that are now the subject of anti-dumping (and countervailing) measures. BlueScope is seeking the Commission to urgently commence a formal investigation into the dumping of galvanised steel exported from India and Vietnam. The timing of the commencement of a formal inquiry is critical to limiting the trending growth in exports of dumped and injurious galvanised steel from India and Vietnam.

BlueScope is also seeking the imposition of provisional measures on galvanised steel exports from India and Vietnam at day 60 of a formal investigation. In light of the importers seeking out new sources of supply (i.e. country hopping) and the circumvention of measures through a change in tariff classification that is achieved via an approximate cost of [\$\$] per metric tonne in the chemical properties of the goods, there can be no delay in accessing provisional measures. This application details the additional injury experienced by the Australian industry due to changes in the source of supply for dumped galvanised steel. Urgent remedies to address changes in supply are necessary to discourage future circumvention opportunities (including relief available from retrospective measures).

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PART B

DUMPING

IMPORTANT

All questions in Part B should be answered even if the answer is 'Not applicable' or 'None' (unless the application is for countervailing duty only: refer Part C). If an Australian industry comprises more than one company/entity, Part B need only be completed once.

For advice about completing this part please contact the Commission's client support section on:

Phone: 1300 884 159
Fax: 1300 882 506
Email: clientsupport@adcommission.gov.au

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B-1 Source of exports.

1. Identify the country(ies) of export of the dumped goods.

The countries of export of the goods the subject of this application are India and Vietnam.

2. Identify whether each country is also the country of origin of the imported goods. If not, provide details.

It is understood that the country of export of the galvanised steel is also the country of origin of the goods.

3. If the source of the exports is a non-market economy, or an 'economy in transition' refer to Part C.4 and Part C.5 of the application.

India and Vietnam are not considered 'non-market economies' or 'economies-in-transition' countries under Australia's Anti-Dumping and Countervailing provisions.

4. Where possible, provide the names, addresses and contact details of:

- **producers of the goods exported to Australia;**
- **exporters to Australia; and**

BlueScope understands the following nominated companies are producers and exporters of the goods the subject of this application to Australia:

India

Jindal Steel Works
JSW Centre
Bandra Kurla Complex,
Mumbai - 400 051
Ph: +91 22 4286 1000
Fax: +91 22 4286 30

Uttam Steel
Uttam House
69, P.D'Mello Road,
Mumbai - 400 009
Tel. : + 91-22-66563500
Fax : + 91-22-23485025

Essar Steel India Limited
Essar House
11, Keshavrao Khadye Marg
Mahalaxmi
Mumbai - 400 034
Phone: +91 (22) 2495 0606 / 6660 1100
Fax: +91 (22) 2492 8896

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Asian Colour Coated Ispat Ltd
ACCIL House
26P, Sector – 33,
Gurgon, Haryana, India
Phone: +91 921-280-0380

POSCO Maharashtra Steel Pvt. Ltd.
Plot No. C-1,
Vile-Bhagad,
MIDC Industrial Area,
Tal- Mangaon, Dist.-Raigad,
Maharashtra-402308

Vietnam

Hoa Sen Steel
183 Nguyen Van Troi Street,
Phu Nhuan District ,
Ho Chi Minh City,
Viet Nam.
Tel: +84 8 3999 0111
Fax: +84 8 3999 0222

- **importers in Australia**

The following companies are understood to be importers of galvanised steel into Australia from the nominated exporting countries:

Marubeni-Itochu Steel Oceania Pty Ltd (MISO)
P O Box 16055
Melbourne Victoria 3007
Phone - 03-9242 1500
Fax - 03-9242 1599
Web Site - www.benichu.com.au

MinMetals Australia Pty Ltd
580 St Kilda Road
Melbourne Victoria 3001
Tel: (03) 9520 6810
Fax: (03) 9521 1815
www.minmetals.com.au

Stemcor Australia Pty Ltd
Level 13, 15 Blue Street
North Sydney NSW 2060
Phone - 02-9959 3088
Fax - 02-9925 0844

Toyota Tsusho (Australasia) Pty Ltd
231-233 Boundary Road
Laverton North Vic 3026
Phone - 03-8368 7991
Fax - 03-8368 7999

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Wright Steel Pty Ltd
Suite 201, 254 Bay Road
Sandringham Vic 3191
Phone - 03-9598 0050
Fax - 03-9597 0050

GS Global Australia Pty Ltd
Lvl 38, 100 Miller Street
North Sydney, NSW. 2060
Phone – 02-9954 0911
Fax – 02-9954 0919

CMC (Australia) Pty Ltd
118 Dowd Street
Welshpool, WA 6986
Phone – 08-9258 6066
Fax – 08-9258 6366

Ferropacific
Suite 5/9-11 Knox Street
Double Bay, NSW 2028
Phone – 02-9363 3513

ThyssenKrupp Mannex Pty Ltd
Locked Bag 2103 Pacific Highway
North Sydney NSW 2059
Phone – 02-995 50978
Fax – 02-9925 0084
Web Site <http://www.tk-mannex.com/english/>

Amity Pacific
PO Box 1015, Suite 301, 270 Pacific Highway
Crows Nest, NSW 1585
Australia
Phone: +61 (2) 9439 1300
Fax: +61 (2) 9439 1344
Web Site www.amitypacific.com.au

Croft Steel Pty Ltd
1-4 Commercial Drive
Ashmore QLD 4214
Phone – 07 - 5532 4271
Fax – 07 – 5532 4301
Web Site – www.croftsteel.com.au

Mitsubishi Australia Ltd
Level 36, 120 Collins St
Melbourne VIC 3000
Phone – 03 – 9275 3999
Fax – 03 – 9275 3928

Oakaya Australia Pty Ltd
Suite 10.02, Level 10, 80 Mount Street
North Sydney NSW 2060
Phone – 02 – 9959 4177
Fax – 02 – 9959 5746

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Daewoo International Australia Office
Suite 403, 50 Margaret St
Sydney NSW 2000
Phone – 02 – 9290 2222
Fax – 02 – 9290 2277

Sojitz Australia Limited
Level 13, MLC Centre, 19-29 Martin Place
Sydney NSW 2000
Phone – 02 – 9234 0935
Fax – 02 – 9235 1080

Dawborn Steels Trading Pty Ltd
26-28 Hargreaves St
Huntingdale VIC 3166
Phone – 03 – 9543 1333
Fax – 03 – 9543 1011

5. If the import volume from each nominated country at Appendix A.2 (Australian Market) does not exceed 3% of all imports of the product into Australia refer to Part C.6 of the application.

Australian Bureau of Statistics (“ABS”) import data for galvanised steel classified to 7210.49.00 (statistical codes 55, 56, 57 and 58) and 7212.30 (statistical code 61) are the subject of ‘No Country Declared’ (“NCD”) suppression orders. As such, complete import data from each of the countries nominated in this application are not available from ABS.

BlueScope has obtained export data from ISSB⁵, a reputable European agency that specialises in the supply of import and export trade data. ISSB data does not include export data for Vietnam. BlueScope has obtained aggregate annualised export data from ABS for the 11 month period ending February 2014. The monthly single statistical code publicly available ex-ABS data for Vietnam import volumes has then been used to trend the annualised number on a quarterly basis.

BlueScope has identified the following volumes of the galvanised steel exported to Australia from 2010/11 to 2011/12 (inclusive), using the ISSB data and the aggregate ABS data. Confidential Appendix A2 includes export data from the 2008/09 year by quarter for all countries.

⁵ ISSB Ltd. Is a European company involved in the publication of reports covering UK, European and global trade in steel and raw materials. The following extract has been obtained from ISSB’s website www.issb.co.uk

“The company also maintains a database of the imports and exports of steel and steelmaking raw materials for more than 50 major steel producing nations, collectively accounting for 97% of global steel output. This high level of coverage also allows an accurate assessment of the trade flows for those countries where national trade data is not readily available and enables ISSB Ltd. to map the worlds movements of steel and steelmaking raw materials.

ISSB holds trade data at 6-digit HS tariff code level (and to 8-digit level for EU countries) and can analyse the international movements of steel and steelmaking raw materials using any combination of tariffs and any combination of countries.”

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Table B-1.5 – Total Export tonnes of galvanised steel to Australia – 2013/14

Country	2011/12	2012/13	2013/14	As % of Total Imports in 2013/14
India	890	3,164	30,596	16.8%
Vietnam	175	978	12,524	6.9%
Taiwan	45,319	79,478	47,135	25.9%
Taiwan (boron)	0	0	8,446	4.6%
China	132,818	115,475	11,675	6.4%
Korea	15,764	18,111	12,391	6.8%
Korea (boron)	0	0	1,073	0.6%
Other	59,237	59,663	57,806	31.8%
Other (boron)	71	172	131	0.1%
Total	254,274	277,041	181,777	99.9%

Source: ISSB and Australian Bureau of Statistics.

Notes:

1. As 2013/14 data is incomplete due to a lag in availability of country of origin data, there is no import volumes recorded for countries for March 2014.
2. Import data for galvanised steel incorporating boron is available from ABS and has been sourced accordingly. All other data (except ex-Vietnam) is sourced from ISSB.

As indicated, ABS does not publish complete import data for galvanised steel as the classifications (except for alloyed-goods) are the subject of suppression order(s). BlueScope has relied upon published export data for determining the import shares held by exporting countries (export data to Australia will only be slightly different to import data, due to timing differences). Each of the exporting countries named in this application – India and Vietnam – have exported volumes that exceed the 3 per cent negligible volume levels in 2013/14.

Please refer to Table B-1.5 above for percentage of total import volumes in 2013/14.

Source data for the above has been included in soft copy form with this application (titled Confidential Attachment B-1.5).

6. **In the case of an application for countervailing measures against exports from a developing country, if the import volume from each nominated country at Appendix A.2 (Australian Market) does not exceed 4% of all imports of the product into Australia refer to Part C.6 of the application**

This application is for anti-dumping measures only, hence this question does not apply.

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B-2 Export price

Possible sources of information on export price include export price lists; estimates from the Australian Bureau of Statistics; a deductive export price calculation from the Australian selling price of the imported goods; export sales quotations or invoices; foreign government export trade clearances.

1. Indicate the FOB export price(s) of the imported goods. Where there are different grades, levels of trade, models or types involved, an export price should be supplied for each.

As indicated above, complete ABS import data by country for the goods the subject of this application is not available due to the No Country Declared ("NCD") suppression order.

BlueScope has included FOB values for exports of galvanised steel in Confidential Appendix A2 sourced from ISSB for India (with the exception of exports from Vietnam). A monthly FOB export price for galvanised steel from the nominated countries has been calculated from the identified Tariff Sub-Heading categories for the goods the subject of the application.

For exports from Vietnam aggregate A\$CIF import data for the 11 months ending February 2014 was purchased by BlueScope from ABS. A weighted-average A\$FOB per tonne price for this period has been calculated by BlueScope. BlueScope calculated an overseas freight and insurance value for steel products exported to Australia from Vietnam from available monthly ABS data to enable an A\$FOB value to be calculated from the ABS A\$CIF data.

The calculated A\$FOB price (deduced from ABS CIF export prices) for Vietnam has been relied upon by BlueScope for comparison with *prima facie* normal values.

BlueScope has used the ISSB FOB prices for India as the basis for determining *prima facie* dumping margins.

2. Specify the terms and conditions of the sale, where known.

The ISSB export prices are understood to be determined at the Free-on-Board ("FOB") point in the country of export. ABS data was sourced at the CIF point of sale. BlueScope has calculated FOB prices for galvanised steel exported to Australia from Vietnam. Details of FOB export prices for India and Vietnam are included in Confidential Attachment B-6 (provided in soft copy).

3. If you consider published export prices are inadequate, or do not appropriately reflect actual prices, please calculate a deductive export price for the goods. Appendix B1 (Deductive Export Price) can be used to assist your estimation.

As indicated above, BlueScope considers the published ISSB export volumes and pricing information for galvanised steel exports from India included in this application to be reliable and, therefore, has not utilised deductive export prices for calculating *prima facie* dumping margins. Similarly, FOB export prices sourced from ABS for Vietnam are also considered reliable for the purposes of establishing *prima facie* dumping margins.

It should be noted that consistent with the negotiation process common in the steel industry, the price of steel imports to the Australian market is negotiated approximately 8 to 12 weeks in advance of delivery. Prices quoted to domestic customers by importers are in Australian dollars, but reflect a US dollar price hedged at the Australian dollar exchange rate on the day of offer. The final reported

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Customs value for the import shipment reflects the agreed US dollar price, converted into Australian dollar at the prevailing exchange rate. The price paid by the domestic customer of the importer reflects the originally negotiated Australian dollar offer, which is not further impacted by exchange rate movements.

4. **It is important that the application be supported by evidence to show how export price(s) have been calculated or estimated. The evidence should identify the source(s) of data.**

BlueScope has included the referred ISSB and ABS data with this application, notated as appropriate throughout this document.

B-3 Selling price (normal value) in the exporter's domestic market.

Possible sources of information about domestic selling prices in the country of export include: price lists for domestic sales (with information on discounts); actual quotations or invoices relating to domestic sales; published material providing information on the domestic selling prices; or market research undertaken on behalf of the applicant.

1. **State the selling price for each grade, model or type of like goods sold by the exporter, or other sellers, on the domestic market of the country of export.**

Basis for normal values – India & Vietnam

The full range of product specifications that are the subject of this application are not commonly sold in India and Vietnam. In addition, published domestic prices for galvanised steel products are not readily available from reliable third parties, industry journals or steel industry publications.

In addition, goods exported from India and Vietnam are understood to be primarily goods of a thinner gauge (i.e. nominally XXXXmm) whereas goods exported from some other countries (i.e. Taiwan) are generally of a thicker gauge (i.e. nominally XXXXmm and above). Galvanised steel of a thinner gauge sells at a higher price due to the higher zinc coating cost when compared with thicker gauge galvanised steel (i.e. thin steel has more square meters per tonne than thicker steel, and as every square meter has a minimum zinc coating applied, this results in a higher zinc metal coating cost per tonne for thin steel).

Domestic pricing information for galvanised steel is tightly held by producers and distributors in each of the exporting countries nominated in this application. BlueScope, however, *[confidential sources]* has obtained selling price information for galvanised steel in each market. The selling price information is based upon *[confidential sources]* during the period 1 April 2013 to 31 March 2014 for galvanised steel (i.e. a like product).

The selling prices are for galvanised steel of varying thicknesses, hence adjustments to the purchase prices has been required (see below).

India – Normal values

Prima facie normal values for galvanised steel exported from India are reflected on a bi-monthly basis in Table B-3.1 below. Selling prices *[confidential sources]* during the nominated period.

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Table B-3.1 – Prima Facie Normal Values – India – A\$ per metric tonne

Apr / May 2013	Jun / Jul 2013	Aug / Sep 2013	Oct / Nov 2013	Dec 2013 / Jan 2014	Feb / Mar 2014
A\$954.83	A\$942.08	A\$944.18	A\$967.92	A\$1031.14	A\$1013.92

Notes:

1. Prices sourced from "India Normal Values Apr 13 to Mar 14-1" file at Confidential Attachment B-3.1.
2. Bi-monthly prices shown for increased clarity around calculated dumping margins throughout the twelve month period.

A weighted-average normal value for galvanised steel exported from India has been calculated by BlueScope for the period 1 April 2013 to 31 March 2014 of A\$979 per metric tonne.

Vietnam – Normal values

Prima facie normal values for galvanised steel exported from Vietnam are reflected in Table B-3.1 below. Selling prices reflect *[confidential sources]* during the nominated period.

Table B-3.2 – Prima Facie Normal values – Vietnam – A\$ per metric tonne

	Selling Price A\$ per MT
April 2013	\$935
May 2013	-
June 2013	-
July 2013	\$978
Aug 2013	\$1067
Sep 2013	-
Oct 2013	\$1028
Nov 2013	\$1037
Dec 2013	\$1073
Jan 2014	\$1088
Feb 2014	-
Mar 2014	\$1050

Notes:

1. Prices are based upon *[confidential sources]*, plus adjustment for thickness of steel.
2. Refer to Confidential Attachment B-3.2 for supporting documentation.

A weighted-average normal value (including adjustments) has been calculated for galvanised steel sold in Vietnam during the period 1 April 2013 to 31 March 2014. The normal value is A\$1039 per metric tonne.

2. Specify the terms and conditions of the sale, where known.

Normal values for India and Vietnam are based upon *[confidential sources]*. An adjustment for thinner gauge product supplied in each country has been made to the normal value to align with export prices to Australia.

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3. Provide supporting documentary evidence.

Supporting evidence for normal values for galvanised steel in India and Vietnam is included at Confidential Attachments B-3.1 and B-3, respectively.

4. List the names and contact details of other known sellers of like goods in the domestic market of the exporting country.

BlueScope has identified some known manufacturers of zinc coated steel products in India and Vietnam in B-1.4 above.

B-4 Estimate of normal value using another method.

This section is not mandatory. It need only be completed where there is no reliable information available about selling prices in the exporter's domestic market. Other methods of calculating a normal value include:

- the cost to make the exported goods plus the selling and administration costs (as if they were sold in the exporter's domestic market) plus an amount for profit (if applicable);
OR
- the selling price of like goods from the country of export to a third country.

1. Indicate the normal value of the like goods in the country of export using another method (if applicable, use appendix B2 Constructed Normal Value).

BlueScope has determined normal values for galvanised steel in India and Vietnam at Section B-3 above.

2. Provide supporting documentary evidence.

As indicated in B-4.1 above, this section does not apply as domestic pricing information has been obtained by BlueScope for India and Vietnam.

B-5 Adjustments.

A fair comparison must be made between the export price and the normal value. Adjustments should be made for differences in the terms and circumstances of the sales such as the level of trade, physical characteristics, taxes or other factors that affect price comparability.

1. Provide details of any known differences between the export price and the normal value. Include supporting information, including the basis of estimates.

Domestic selling prices for galvanised steel in India and Vietnam are based upon *[confidential sources]*. As discussed above, *[confidential sources]*. *[Confidential sources]* have been relied upon by BlueScope to determine *prima facie* normal values.

Galvanised steel *[confidential sources]* are primarily for heavy gauge (or thick) galvanised steel. The

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goods exported to Australia from India are primarily light gauge or thin product. The sourced domestic selling prices in India [confidential sources] are generally for [XXXXmm - XXXXmm] gauge galvanised steel. To enable a fair comparison between the thicker domestic selling prices and the thinner gauge export prices to Australia, an uplift of the normal value (for the additional cost associated with coating thinner gauge product) is required. BlueScope has obtained coating cost [confidential sources] and, as appropriate, adjusted the heavier thickness galvanised steel to thin gauge steel exported to Australia.

In respect of India, the [confidential sources] goods in India was generally for [XXXXmm - XXXXmm] thick galvanised steel. The goods exported to Australia have a nominal thickness of [XXXXmm]. The adjustment applied represents the additional cost of coating required for thinner gauge steel. The amount of the adjustment required to a domestic [XXXXmm] thickness product is an additional [A\$XXXX] per metric tonne to establish a like-for-like comparison to the exported light gauge product.

The prima facie normal values for India have been uplifted by this amount to enable a fair comparison between the constructed normal value and export prices to Australia for galvanised steel.

For Vietnam, [confidential sources] prices are for [XXXXmm - XXXXmm] gauge thick galvanised steel [confidential sources] the twelve-month period. The range of the adjustment required for comparison purposes with thinner gauge product exported to Australia is [A\$XXXX] per metric tonne.

Please refer to supporting documentation for gauge adjustments at Confidential Attachment B-3.1 (India) and B-3.2 (Vietnam).

Export prices sourced from ISSB are at the FOB level. ABS export prices for Vietnam have been calculated to the FOB level. The FOB export prices are therefore likely to include domestic inland freight in the country of export. BlueScope does not have access to inland freight charges from the manufacturer in the exporting country to place of export.

Normal values for the GUC in India and Vietnam therefore require an uplift to take account of the inland freight included in export prices (at FOB point). In the absence of actual inland freight charges in the exporting country, BlueScope has not adjusted normal values to reflect the inland freight charge.

2. State the amount of adjustment required for each and apply the adjustments to the domestic prices to calculate normal values. Include supporting information, including the basis of estimates.

BlueScope has indicated the amounts of adjustments included in prima facie normal values for India and Vietnam in B-5.1 above.

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B-6 Dumping margin.

1. Subtract the export price from the normal value for each grade, model or type of the goods (after adjusting for any differences affecting price comparability).

The dumping margins for galvanised steel exported to Australia from India and Vietnam during the period 1 April 2013 to 31 March 2014 are summarized below.

India

	April 2013 to March 2014
Normal Value A\$/MT	979
Export Price A\$/MT	865
Dumping Margin A\$/MT	114
As % of Export price	13.23 per cent

Please refer to Confidential Attachment B-3.1 for supporting information detailing normal value and export price values above.

Vietnam

	April 2013 to March 2014
Normal Value A\$/MT	1039
Export Price A\$/MT	893
Dumping Margin A\$/MT	145
As % of Export price	16.26 per cent

Please refer to Confidential Attachment B-3.2 for supporting information detailing normal value and export price values above.

2. Show dumping margins as a percentage of the export price.

Dumping margins for galvanised steel exported from India and Vietnam as a percentage of export price are included in B-6.1 above.

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PART C

SUPPLEMENTARY SECTION

IMPORTANT

Replies to questions in Part C are not mandatory in all instances, but may be essential for certain applications.

For advice about completing this part please contact the Commission's client support section on:

Phone: 1300 884 159
Fax: 1300 882 506
Email: clientsupport@adcommission.gov.au

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C-1 Subsidy

This section must be completed where countervailing duties are sought to offset foreign government assistance through subsidies to exporters or producers.

If the application is for countervailing duty alone, the domestic price information required by Part B of the application need not be supplied.

Responses to questions A-9 will need to identify the link between subsidisation and injury.

1. Identify the subsidy paid in the country of export or origin. Provide supporting evidence including details of:

- (i) the nature and title of the subsidy;
- (ii) the government agency responsible for administering the subsidy;
- (iii) the recipients of the subsidy; and
- (iv) the amount of the subsidy.

This application is based on material injury experienced in 2012/13 and 2013/14 from dumped exports of galvanised steel from India and Vietnam. The application does not allege the exported goods are subsidised. This question therefore does not apply.

C-2. Threat of material injury

Address this section if the application relies solely on threat of material injury (ie where material injury to an Australian industry is not yet evident).

1. Identify the change in circumstances that has created a situation where threat of material injury to an Australian industry from dumping/subsidisation is foreseeable and imminent, for example by having regard to:

1. the rate of increase of dumped/subsidised imports;
2. changes to the available capacity of the exporter(s);
3. the prices of imports that will have a significant depressing or suppressing effect on domestic prices and lead to further imports;
4. inventories of the product to be investigated; or
5. any other relevant factor(s).

BlueScope has detailed in this application that the dumped exports from India and Vietnam have caused material injury to the Australian industry during 2012/13 and 2013/14. This application, therefore, is not based upon the “threat” of material injury from the dumped exports.

2. If appropriate, include an analysis of trends (or a projection of trends) and market conditions illustrating that the threat is both foreseeable and imminent.

As indicated at Section C-2.1 above, this application is not based on a “threat” of material injury.

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C-3. Close processed agricultural goods

Where it is established that the like (processed) goods are closely related to the locally produced (unprocessed) raw agricultural goods, then – for the purposes of injury assessment – the producers of the raw agricultural goods form part of the Australian industry. This section is to be completed only where processed agricultural goods are the subject of the application. **Applicants are advised to contact the Commission's client support section before completing this section.**

1. Fully describe the locally produced raw agricultural goods.

The goods the subject of this application are not considered 'raw agricultural goods'.

2. Provide details showing that the raw agricultural goods are devoted substantially or completely to the processed agricultural goods.

The goods the subject of this application are not considered 'raw agricultural goods', hence this question is not applicable.

3. Provide details showing that the processed agricultural goods are derived substantially or completely from the raw agricultural goods.

The goods the subject of this application are not considered 'raw agricultural goods', hence this question is not applicable.

4. Provide information to establish either:

- **a close relationship between the price of the raw agricultural goods and the processed agricultural goods; or**
- **that the cost of the raw agricultural goods is a significant part of the production cost of the processed agricultural goods.**

The goods the subject of this application are not considered 'raw agricultural goods', hence this question is not applicable.

C-4. Exports from a non-market economy

Complete this section only if exports from a non-market economy are covered by the application. The domestic price information required by Part B of the application need not be supplied if this question is answered.

Normal values for non-market economies may be established by reference to selling prices or to costs to make and sell the goods in a comparable market economy country.

1. Provide evidence the country of export is a non-market economy. A non-market economy exists where the government has a monopoly, or a substantial monopoly, of trade in the country of export and determines (or substantially influences) the domestic price of like goods in that country.

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India and Vietnam are not considered “non-market economy” countries for the purposes of Australia’s Dumping and Countervailing Provisions. This question is therefore not applicable.

2. Nominate a comparable market economy to establish selling prices.

This question does not apply.

3. Explain the basis for selection of the comparable market economy country.

This question does not apply.

4. Indicate the selling price (or the cost to make and sell) for each grade, model or type of the goods sold in the comparable market economy country. Provide supporting evidence.

This question does not apply.

C-5 Exports from an ‘economy in transition’

An ‘economy in transition’ exists where the government of the country of export had a monopoly, or substantial monopoly, on the trade of that country (such as per question C-4) and that situation no longer applies.

Complete this section only if exports from an ‘economy in transition’ are covered by the application. **Applicants are advised to contact the Commission’s client support section before completing this section**

1. Provide information establishing that the country of export is an ‘economy in transition’.

India and Vietnam are not considered “economy-in-transition” countries for the purposes of Australia’s Dumping and Countervailing Provisions. This question is therefore not applicable.

2. A price control situation exists where the price of the goods is controlled or substantially controlled by a government in the country of export. Provide evidence that a price control situation exists in the country of export in respect of like goods.

This question does not apply.

3. Provide information (reasonably available to you) that raw material inputs used in manufacturing/producing the exported goods are supplied by an enterprise wholly owned by a government, at any level, of the country of export.

This question does not apply.

4. Estimate a ‘normal value’ for the goods in the country of export for comparison with export price. Provide evidence to support your estimate.

This question does not apply.

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C-6 Aggregation of Volumes of dumped goods

Only answer this question if required by question B-1.5 of the application and action is sought against countries that individually account for less than 3% of total imports from all countries (or 4% in the case of subsidised goods from developing countries). To be included in an investigation, they must collectively account for more than 7% of the total (or 9% in the case of subsidised goods from developing countries).

	Quantity	%	Value	%
All imports into Australia		100%		100%
Country A*				
Country B*				
etc*				
Total				

* Only include countries that account for less than 3% of all imports (or 4% in the case of subsidised goods from developing countries). Use the data at [Appendix A.2](#) (Australian Market) to complete the table.

The import volumes from India and Vietnam exceed the 3 per cent negligible volumes in the April 2013 to March 2014 twelve-month period. Please refer to Table B-1.5 above.

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APPENDICES

Appendix A1	Australian Production
Appendix A2	Australian Market
Appendix A3	Sales Turnover
Appendix A4	Domestic Sales
Appendix A5	Sales of Other Production
Appendix A6.1	Cost to Make and Sell (& profit) Domestic Sales
Appendix A6.2	Cost to Make and Sell (& profit) Export Sales
Appendix A7	Other Injury Factors
Appendix A8	Authority to Deal With Representative
Appendix B1	Deductive Export Price
Appendix B2	Constructed Normal Value

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