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BlueScope Steel Limited
Sirius Building
Five Islands Road, Port Kembla NSW 2505
PO Box 1854, Wollongong NSW 2500
P +61 2 4275 4638 | M +61 412 377 603
E Chad.Uphill@bluescope.com

10 December 2014

Mr Geoff Gleeson
Director, Operations 1
Anti-Dumping Commission
C/o Customs House
1010 La Trobe Street
MELBOURNE DOCKLANDS VICTORIA 3008

Dear Mr Gleeson

Public File

Investigation No. 273 – Zinc Coated (galvanised) Steel exported from Korea by Dongbu Steel Co Ltd – Review of Anti-Dumping Measures

Introduction

I refer to the application by Dongbu Steel Co., Ltd (“Dongbu”) for the review of anti-dumping measures on exports of zinc coated (galvanised) steel from the Republic of Korea.

The application asserts there has been a change in one or more of the variable factors over the period following the imposition of measures by the Minister. The Minister’s decision was published on 20 February 2014.

BlueScope Steel Limited (“BlueScope”) is the sole Australian manufacturer of zinc coated (galvanised) steel (“the goods”) in Australia. BlueScope is therefore an interested party and is considered the “Australian Industry” for the purpose of inquiries involving the goods. BlueScope seeks to fully cooperate and participate in this review of measures investigation.

The application by Dongbu was received by the Anti-Dumping Commission (“the Commission”) on 1 October 2014. A notice announcing the commencement of the review was published in *The Australian* on 31 October 2014. ADN No. 2014/120 was published on 31 October 2014 announcing the commencement of the review, with submissions from interested parties required by 10 December 2014.

Investigation Period

The nominated investigation period for the review of measures is 1 October 2013 to 30 September 2014.

Changes in variable factors

Dongbu claims that it has increased its export prices following the imposition of the measures from 5 August 2013. Dongbu’s dumping margin was calculated at 3.2 per cent for the original investigation period. It is expected that Dongbu’s recent export prices reflect the non-dumped level for Dongbu’s exports to Australia.

Dongbu also suggests that Australian selling prices for the goods have not increased following the imposition of measures “as Dongbu expected”. This has been the case due to the emergence of exports of the goods from India and Vietnam since the imposition of provisional measures in February 2013.

Due to the further incursion of dumped exports from new sources of supply, BlueScope has been unable to recover its selling prices to non-injurious levels. The Commission already has access to BlueScope’s Cost-to-Make –and-Sell (“CTM&S”) data for the periods to 30 June 2014. The data reflects ongoing material injury due to the increase in exports from India and Vietnam¹.

In Trade Measures Report No. 190, the Commission concluded that the non-injurious price (“NIP”) should be based upon the full margin of dumping. Whereas it is BlueScope’s preference for a NIP to be based upon a different methodology, BlueScope is pragmatic to understand that any measures cannot exceed the full margin of dumping.

BlueScope anticipates that the Commission will, in the conduct of this review investigation, ensure that:

- Dongbu’s normal values reflect sales of like goods made in the ordinary course of trade, in sufficient volumes across the investigation period (s.269TAC(1)); or
- where sales are not in accordance with s.269TAC(1), Dongbu’s CTM&S reflect all costs incurred by the exporter throughout the investigation period.

Closing Remarks

BlueScope looks forward to assisting the Commission with its inquiries into the review of measures of zinc coated (galvanised) steel exports to Australia by Dongbu. BlueScope has attached for the Commission updated CTM&S data for the goods for the period to 30 September 2014. For the purposes of this review, it is BlueScope’s view at this time that the NIP be based on the full margin of dumping.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 4275 4638 (direct), or BlueScope’s consultant John O’Connor on (07) 3342 1921.

Yours sincerely



Chad Uphill
International Trade Affairs

Confidential Attachment – Appendix A6.1 CTM&S data to 30 September 2014

¹ Refer Investigation No. 249.