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28 September 2016

The Director
 Operations 3
 Anti-Dumping Commission
 GPO Box 1632
 Melbourne Victoria 3001

Public File

Dear Sir/Madam,

Investigation No. 375 – Aluminium Zinc Coated Steel: Yieh Phui (China) Technomaterial Co., Ltd

I. Introduction

I refer to the above-noted review investigation for aluminium-zinc coated steel that commenced on 22 September 2016.

BlueScope Steel Limited (“BlueScope”) is the only Australian manufacturer of aluminium-zinc coated steel. BlueScope was the applicant company that requested anti-dumping and countervailing measures on aluminium-zinc coated steel exported from China. As such, BlueScope seeks to ensure that the anti-dumping and countervailing measures continue to be effective in removing the injury that they are intended to prevent.

II. Fair comparison

BlueScope notes the practice of the Anti-Dumping Commission (“the Commission”) when comparing domestic and export models for determining applicable dumping margins. At Section 7.3 of the manual it is stated:

*“For normal value to be ascertained under s.269TAC(1), the Commission first examines whether there are suitable sales of like goods for home consumption in the country of export by the exporter, made in the ordinary course of trade and at arms-length over the investigation period. **Model-matching criteria will be followed in order to identify identical goods sold on the exporter’s domestic market;** or absent identical goods which goods closely resemble the goods under consideration.”* (Emphasis added).

The practice of model-matching has been an area of concern to BlueScope. The model-matching practice of exporters in past investigations has been hidden by the redaction of relevant information that details the basis for model-matching comparisons of domestic and exported goods. BlueScope requests the Commission to be vigilant in ensuring that the basis for model-matching is fully agreed prior to verification.

To assist in this process, BlueScope is proposing a Product Control Number (“PCN”) System that permits the ready identification of key attributes associated with aluminium-zinc coated steel grades/models produced by manufacturers/exporters.

The PCN Coding System permits the ready identification of aluminium-zinc coated steel products taking account of:

- Prime/non-prime;
- Coating mass;
- Grade designation (as per applicable standards);
- Thickness (Base Metal Thickness);
- Width; and
- Form (coil or sheet).

Please refer to the previously provided¹ PCN Coding System for all aluminium-zinc coated steel products manufactured by BlueScope.

The adoption of the PCN coding system will permit ready model-matching comparisons to be undertaken by the Commission prior to its verification visit. BlueScope has prepared all domestic sales in Appendix A4 format for aluminium-zinc coated steel for the July 2015 to June 2016 investigation period, referenced by PCNs. This Confidential Attachment has also been previously provided² to the Commission.

BlueScope is aware (and understands the Commission is also aware) that the use of the PCN Coding System is a current practice employed by the US Department of Commerce ("US DOC") and the European Commission ("EC") in anti-dumping investigations. The US practice involves the cooperative exporter providing the equivalent domestic sales by PCN Code for the investigation period prior to the scheduled deadline for the acceptance of all information from cooperative exporters. Any challenges to the PCN Coding System must be considered prior to the specified deadline for all requested information contained in the Exporter Questionnaire Response ("EQR"). Where information is not provided in PCN Code format, the exporter is considered 'non-cooperative'.

III. Recommendation

BlueScope requests the Commission request that Yieh Phui (China) Technomaterial Co., Ltd prepare Appendix A4 domestic sales information in accordance with the above-noted PCN Coding System. The adoption of this methodology will enhance the model-matching process for the determination of dumping margins for the exported goods the subject of measures.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 4275 4638.

Yours faithfully,



Chad Uphill
Leader – Trade Affairs

¹ BlueScope Public File submission dated 8 September 2016: Aluminium-zinc coated steel investigation No.'s 367 and 372.

² Ibid