



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@bluescopesteel.com

20 October 2016

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

Public File

Dear Belinda,

Zinc coated galvanised steel review investigations – Synn Industrial Co., Ltd (Investigation No. 366) and Yieh Phui Enterprise Co., Ltd (Investigation No. 368)

I. Background

I refer to the review investigations for galvanised steel in respect of exports of zinc coated galvanised steel ("galvanised steel") exported by Synn Industrial Co., Ltd ("Synn") – Investigation No. 366, Yieh Phui Enterprise Co., Ltd ("Yieh Phui") – Investigation No. 368.

Completed Exporter Questionnaire Responses ("EQRs") for both exporters have recently been placed on Electronic Public Record. BlueScope seeks to draw to the attention of the Anti-Dumping Commission ("the Commission") the redactions made by the exporters in relation to Product Control Number ("PCN") information and the level of additional redactions by the two exporters.

II. Synn Industrial Co., Ltd

(a) *Product Control Numbers*

Section C-2 of Synn's EQR details the exporter's classification of galvanised steel products manufactured according to its PCN. However, Synn has redacted the PCN categories and the relevant coating mass (g/m²) from the Public File version of its EQR.

BlueScope Steel limited ("BlueScope") has fully disclosed the methodology and detail of its PCN classifications and considers that it is appropriate for the exporters involved in the current review investigations to similarly disclose PCN details to ensure consistency in model matching exercises.

BlueScope requests the Commission to require cooperative exporters to disclose all PCN classification details in accordance with BlueScope's full disclosure. It cannot be considered that the classification of product according to its coating mass warrants redaction (as there is no commercially sensitive pricing information attached to the PCN listing).

(b) *Level of redacted information*

The Public File version of the Synn EQR includes a substantial level of redacted information. The Commission's attention is drawn to Sections D-1, D-6, E-1.2 (unclear on justification for confidentiality of export expenses), E-1.3, E-2.9, and G-5.3. No effort has been made to summarise in a non-confidential

manner the nature of the information removed from the Public File version of the EQR as is required by ACDN 2012/42.

III. Yieh Phui Enterprise Co., Ltd

(a) *Product Control Numbers*

As indicated above with respect to Synn, Yieh Phui has also redacted details of PCN categories from its Public File EQR.

It is unclear on what basis Yieh Phui (and Synn) have sought the redaction of PCN's and associated characteristics (coating thickness, etc) as this information cannot be claimed as being of a commercially sensitive nature. As per BlueScope's full disclosure of PCN details, cooperative exporters must also be required to provide full disclosure.

(b) *Fair comparison*

It is noted that Yieh Phui is seeking a broader range of adjustments to normal value in the current review than in the original investigation (No. 190).

In the original investigation, adjustments made were as follows:

- Negative:
 - Domestic packing;
 - Domestic inland freight; and
 - Domestic warranty expenses.
- Positive:
 - Specification adjustment (coating mass, thickness, width variations);
 - Direct export expenses; and
 - S,G&A (Asiazone S,G&A costs).

BlueScope anticipates that adjustments as per the same categories identified in Investigation No. 190 would similarly apply in the current review. It is noted, however, that Yieh Phui is claiming in this review investigation that no specification adjustments are required as the goods sold domestically and for export are identical. BlueScope is seeking the Commission to be vigilant in its examination of PCNs for Yieh Phui's sales of goods sold domestically and for export to ensure specification adjustments are made, where required.

BlueScope also notes that Yieh Phui has incurred warranty expenses on export sales to Australia. An upward adjustment to normal value for warranty expenses incurred on Australian sales will be required.

It is further observed that Yieh Phui considers that packing "does not vary by geographic market". This is not BlueScope's understanding. BlueScope requests that the Commission fully inquire of Yieh Phui its packaging requirements for domestic and export sales, supported by the sighting of packaged goods destined for domestic and export markets.

IV. Recommendation

BlueScope is seeking the Commission to require cooperative exporters to fully disclose PCNs and applicable coating mass' in EQRs as has been disclosed by BlueScope, for fair comparison purposes. Additionally,

BlueScope is seeking the Commission to ensure that for redacted information an adequate explanation is included in place of the redacted text, as required by ACDN No. 2012/42.

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

Yours faithfully

A handwritten signature in black ink, appearing to read 'C Uphill', written in a cursive style.

Chad Uphill
Leader – Trade Affairs