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

Public File

Dear Sir/Madam,

Galvanised Steel and Aluminium-Zinc Coated Steel Review Investigations – Exports to Australia from Taiwan, Korea and the People’s Republic of China

I. Chinese Exporters – Raw Material Cost Surrogacy

I refer to review investigations into aluminium zinc coated steel (Investigations No 367, 372 and 375) and galvanised steel (Investigations No. 365, 371 and 374) exported from the People’s Republic of China (“China”).

International Trade Remedies Branch Investigation No. 190 (REP 190) and No. 274 (REP 274) determined Chinese exporter normal values using producer-specific weighted average cost to make and sell data (under sub-section 269TAC(2)(c)), revised for a hot-rolled coil (“HRC”) raw material cost uplift, and including an amount for profit based on the relevant exporter’s domestic sales of like goods determined as being in the ordinary course of trade.

HRC cost uplifts were established by reference to East Asian benchmark prices and price indices. BlueScope submits that published East Asian benchmark prices are heavily influenced by excess Chinese exports and excess HRC supply in the region. The East Asia benchmark prices (and indices) for HRC are neither relevant nor representative of prices unaffected from the influence of Government of China policies and measures that cause Chinese HRC prices to be artificially low.

Further to previous submissions, BlueScope reiterates that the relevant HRC price to be included in the current review investigations for Chinese exporters is a domestic in-country price from Korea and Taiwan, as was used in Report No. 190 and obtained from cooperative exporters in Korea and Taiwan in the conduct of the investigation. HRC prices for both the Korean and Taiwanese domestic markets are available from [*Confidential Index Source*].

Certain of the exporter visits in relation to the review investigations have already been undertaken (including for exporters in Taiwan). Information as to prevailing domestic HRC prices in Korea will be available from Korean galvanised steel and aluminium zinc coated exporters (i.e. Dongbu) for periods covered by the current reviews.

This information will avail the Anti-Dumping Commission (“ADC”) of in-country HRC price information for Korea and Taiwan that may be included as a ‘benchmark’ HRC cost in the Chinese exporter’s constructed normal values for the purposes of the identified Chinese exporter reviews.

BlueScope submits that the actual domestic HRC purchase prices of Korean and Taiwanese galvanised steel and aluminium zinc coated steel exporters are considered more reliable than benchmark prices sourced from industry newsletters. Of course, where actual domestic HRC prices cannot be obtained, reference to the industry newsletters may be required.

II. Recommendation

BlueScope requests the Commission to utilise domestic HRC purchase prices for Korean and Taiwanese exporters of galvanised steel and aluminium zinc coated steel for the purposes of applying a HRC benchmark cost in constructing normal values under subsection 269TAC(2)(c) for Chinese exporters in the current review investigations. Where this information is not available, it is recommended that the Commission make reference to [*Confidential Index Source*] as an accurate and representative published third-party source of HRC home-market pricing when calculating the raw material cost uplift for Chinese exporters.

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