



**Australian Government**  
**Anti-Dumping Commission**

**ANTI-CIRCUMVENTION INQUIRIES**

**HOLLOW STRUCTURAL SECTIONS EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA, THE REPUBLIC OF KOREA AND MALAYSIA**

**AND**

**ZINC COATED (GALVANISED) STEEL EXPORTED FROM THE REPUBLIC OF KOREA, TAIWAN AND THE PEOPLE'S REPUBLIC OF CHINA**

**RECORD OF MEETING WITH  
AUSTUBE MILLS PTY LTD AND BLUESCOPE STEEL LIMITED**

**Date:** 24 November 2015

**Location:** Anti-Dumping Commission  
Level 35, 55 Collins Street, Melbourne

**Attendees:** Anti-Dumping Commission

Andrea Stone  
A/g Director, Operations 2

Rhys Piper  
Director, Operations 1

Roman Maevsky  
Assistant Director, Operations 2

Austube Mills Pty Ltd

■  
Manager Trade Development

■  
Trade Measures Manager

■  
Senior Commercial Analyst

BlueScope Steel Limited

■  
Development Manager

■  
Senior Finance Analyst

John O'Connor and Associates

John O'Connor  
Director

**Purpose of meeting:**

The purpose of the meeting was for Austube Mills Pty Ltd (ATM) and BlueScope Steel Limited (BlueScope) to discuss the preliminary findings in Statement of Essential Facts 290 and 298 (SEF 290 and 298) and Statement of Essential Facts 291 (SEF 291) in relation with the abovementioned anti-circumvention inquiries.

## PUBLIC RECORD

### Discussion:

- ATM and BlueScope are pleased that SEF 290 and 298 and SEF 291 have made positive factual findings of circumvention and that retrospective application of changes to the original dumping duty and countervailing duty notices are recommended.
- However, the proposed recommendations do not properly address the intent of section 48 of the *Customs (International Obligations) Regulations 2015* as they:
  - do not propose to capture goods containing alloys under the original notices; and
  - only target certain companies
- ATM and BlueScope consider that the proposed approach unreasonably provides avenues for further circumvention through the use of alloys other than boron, or export via other entities.
- ATM and BlueScope submitted that in order to properly address the circumvention activity, the Anti-Dumping Commission should alter the original notices to include all exports of all alloyed goods from all exporters from the relevant countries for each inquiry.
- The Commission highlighted that it is conscious of unreasonably capturing legitimate trade and whether an extension of the notices to include any alloys is possible, given that only boron has been found to have been used to slightly modify the investigated goods.
- ATM and BlueScope observed that the volume of “legitimate trade” appears very small and has only been raised by one importer.
- ATM and BlueScope further observed that in the case of some exporters the Commission was satisfied to extend the Duty Notices to include “alloys” generally.