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8 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. 272 – Aluminium Zinc Coated 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 aluminium zinc coated 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 aluminium zinc coated steel (“the goods”) in Australia. BlueScope is therefore an interested party and is considered the “Australian Industry” for the purposes 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. ADN No. 2014/114 was published on 31 October 2014 announcing the commencement of the review, with submissions from interested parties required by 7 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 5.8 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 suggests that Australian selling prices for the goods have not increased following the imposition of measures “as Dongbu expected”. Dongbu’s assertions in this regard are incorrect. There has been some price recovery on the Australian market that reflects the impact of the measures.

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 the Commission will again recommend (as it did in the original investigation) that the NIP in the review will also be at 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 aluminium zinc coated 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 3859 (direct), or BlueScope’s consultant John O’Connor on (07) 3342 1921.

Yours sincerely



Alan Gibbs  
Development Manager – International Trade Affairs

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