



CUSTOMS ACT 1901 - PART XVB

STATEMENT OF ESSENTIAL FACTS

REPORT NO. 249

ALLEGED DUMPING OF
ZINC COATED (GALVANISED) STEEL EXPORTED FROM
INDIA AND THE SOCIALIST REPUBLIC OF VIETNAM

16 JUNE 2015

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ABBREVIATIONS

AUD	Australian dollars
ACBPS	Australian Customs and Border Protection Service
the Act	<i>Customs Act 1901</i>
ADN	Anti-Dumping Notice
ANSTEEL	Angang Steel Company Limited
BlueScope	BlueScope Steel Limited
BMT	Base metal thickness
BOS	Basic oxygen steelmaking
China	the People's Republic of China
the Commission	Anti-Dumping Commission
the Commissioner	Commissioner of the Anti-Dumping Commission
CTM	Cost to make
CTMS	Cost to make and sell
CTS	Cost to sell
EPR	Electronic public record
Essar Steel	Essar Steel India Ltd
FIS	Free into store
FOB	Free on board
FY	Financial year
the goods	the goods the subject of the application (also referred to as the goods under consideration)
Hoa Sen	Hoa Sen Group
HRC	Hot rolled coil
the investigation period	1 July 2013 to 30 June 2014
IPP	Import parity pricing
JSW Coated	JSW Steel Coated Products Limited
JSW Steel	JSW Steel Ltd
Korea	the Republic of Korea
Nam Kim	Nam Kim Steel Joint Stock Company
the Parliamentary Secretary	the Parliamentary Secretary to the Minister for Industry and Science
POSCO Steel	POSCO Maharashtra Steel Pvt. Ltd.
REP 190	Trade Measures Report No. 190
REP 193	Trade Measures Report No. 193
SEF	Statement of essential facts
Toyota Tsusho	Toyota Tsusho (Australasia) Pty. Ltd.
Uttam Galva	Uttam Galva Steels Ltd.
Vietnam	the Socialist Republic of Vietnam

1 SUMMARY AND RECOMMENDATIONS

1.1 Introduction

This statement of essential facts (SEF) relates to the investigation by the Anti-Dumping Commission (the Commission) of the allegations made by BlueScope Steel Limited (BlueScope) that certain zinc coated (hereafter referred to as galvanised) steel¹ exported to Australia from India and the Socialist Republic of Vietnam (Vietnam) at dumped prices caused material injury to the Australian industry producing like goods.

This SEF sets out the facts on which the Commissioner of the Anti-Dumping Commission (the Commissioner) proposes to terminate this investigation.

1.2 Findings

Based on the findings in this SEF, and subject to any submissions received in response to this SEF, the Commissioner proposes to **terminate** the investigation.

The Commission notes that dumping duties will be recommended when:

- goods have been exported to Australia at dumped prices – dumping occurs where the export price is lower than the normal value in the country of export (normal value is usually based on domestic selling prices or costs); and
- the dumping has caused material injury to the Australian industry producing like goods.

In this case, the Commission has found that particular exporters from India and Vietnam were dumping. The volume of dumped goods from Vietnam was negligible. After considering a range of factors relating to dumped goods from India, including the magnitude of the dumping margins and the volume of dumped goods, the Commission is satisfied that the dumping has not caused material injury to the Australian industry.

More specifically, in respect of:

- Hoa Sen Group (Hoa Sen) from Vietnam;
- JSW Steel Coated Products Limited (JSW Coated) from India;
- POSCO Maharashtra Steel Pvt. Ltd. (POSCO Steel) from India; and
- Uttam Galva Steels Ltd. (Uttam Galva) from India,

the Commissioner proposes to terminate the investigation under subsection 269TDA(1) of the *Customs Act 1901* (the Act),² on the basis of the Commission's finding that exports by these exporters were not dumped.

In respect of all other exporters from Vietnam, the Commissioner proposes to terminate the investigation under subsection 269TDA(3), on the basis of the Commission's finding that the volume of dumped goods exported to Australia from Vietnam was negligible.

¹ Refer to the full description of the goods in Section 3.2.1 of this report.

² All legislative references in this report are to the *Customs Act 1901*, unless otherwise stated.

In respect of all other exporters from India, the Commissioner proposes to terminate the investigation under subsection 269TDA(13) on the basis of the Commission's finding that injury, if any, to the Australian industry caused by those exports was negligible.

1.3 Application of law to facts

1.3.1 Authority to make decision

Division 2 of Part XVB of the Act sets out, among other matters, the procedures to be followed and the matters to be considered by the Commissioner in conducting investigations in relation to the goods covered by an application.

1.3.2 Application

On 8 May 2014, an application was lodged on behalf of BlueScope requesting that the Parliamentary Secretary to the Minister for Industry and Science (the Parliamentary Secretary)³ publish a dumping duty notice in respect of galvanised steel exported to Australia from India and Vietnam.

1.3.3 Initiation of investigation

After examining the application, the Commissioner was satisfied that:

- the application complied with subsection 269TB(4);
- there was an Australian industry in respect of like goods; and
- there appeared to be reasonable grounds for the publication of a dumping duty notice in respect of goods the subject of the application (the goods).⁴

The Commissioner decided not to reject the application, and notice of the initiation of this investigation was published on 11 July 2014.⁵

1.4 SEF

The Commissioner must, within 110 days after the initiation of an investigation, or such longer period as the Parliamentary Secretary allows,⁶ place on the public record a statement (this SEF) on which the Commissioner proposes to base a recommendation in relation to the application.⁷

³ The Minister for Industry and Science has delegated responsibility with respect to anti-dumping matters to the Parliamentary Secretary, who is the relevant decision maker for this investigation.

⁴ Subsection 269TC(1).

⁵ Subsection 269TC(4).

⁶ Subsection 269ZHI(3).

⁷ Subsection 269TDAA(1).

The SEF was originally due to be placed on the public record by 29 October 2014; however, the Parliamentary Secretary has granted three extensions to this date.⁸ The third extension required the Commission to publish this SEF on or before 16 June 2015.

In formulating the SEF, the Commissioner must have regard to the application, and any submissions concerning publication of the notice that are received by the Commission within 40 days of the date of initiation of the investigation.⁹ The Commissioner may also have regard to any other matters considered relevant.¹⁰

1.5 Findings and conclusions

The Commission has made the following findings and conclusions based on available information at this stage of the investigation.

1.5.1 The goods under consideration and like goods (Chapter 3 of this report)

Locally produced galvanised steel is like to the goods under consideration.

1.5.2 Australian industry (Chapter 4 of this report)

There is an Australian industry producing like goods, comprising of one Australian producer of galvanised steel, being BlueScope.

1.5.3 Australian market (Chapter 5 of this report)

The Australian market for galvanised steel is supplied by locally produced galvanised steel, as well as imports predominantly from India, Japan, the Republic of Korea (Korea), New Zealand, Taiwan and Vietnam.

1.5.4 Dumping (Chapter 6 of this report)

The Commission has assessed that during the investigation period (1 July 2013 to 30 June 2014):

- galvanised steel exported to Australia from India by JSW Coated, POSCO Steel and Uttam Galva was not at dumped prices;
- galvanised steel exported to Australia from India by all exporters other than JSW Coated, POSCO Steel and Uttam Galva was at dumped prices, the dumping margins were not negligible and the volume of dumped goods was not negligible;
- galvanised steel exported to Australia from Vietnam by Hoa Sen was not at dumped prices;
- galvanised steel exported to Australia from Vietnam by all exporters other than Hoa Sen was at dumped prices and the dumping margins were not negligible; and
- the volume of dumped goods exported to Australia from Vietnam was negligible.

⁸ Anti-Dumping Notice (ADN) No. 2014/117, ADN No. 2015/37 and ADN No. 2015/60 refer.

⁹ Paragraph 269TDAA(2)(a).

¹⁰ Paragraph 269TDAA(2)(b).

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The Commission's assessment of dumping margins for galvanised steel exported to Australia from India and Vietnam is outlined below:

Country	Exporter / Manufacturer	Dumping margin
India	Essar Steel India Ltd	7.4%
	JSW Coated	-2.4%
	POSCO Steel	-3.5%
	Uttam Galva	-2.2%
	<i>Uncooperative exporters</i>	14.2%
Vietnam	Hoa Sen	-3.5%
	Nam Kim Steel Joint Stock Company	7.8%
	<i>Uncooperative exporters</i>	7.8%

Figure 1 – Dumping margins – India and Vietnam

1.5.5 Economic condition of the Australian industry (Chapter 7 of this report)

During the investigation period, the Australian industry producing like goods has experienced:

- price depression;
- price suppression;
- reduced profit and profitability; and
- reduced return on investment.

1.5.6 Causation (Chapter 8 of this report)

The injury, if any, to the Australian industry producing like goods that was caused by dumped exports of galvanised steel from India was negligible.

1.5.7 Non-injurious price

As the galvanised steel exported to Australia from India at dumped prices has not caused material injury to the Australian industry, the Commission has not calculated a non-injurious price.

2 BACKGROUND

2.1 Initiation

On 8 May 2014, BlueScope lodged an application for the publication of a dumping duty notice in respect of certain galvanised steel¹¹ exported to Australia from India and Vietnam.

BlueScope provided further information and data in support of its application on three occasions, the last of which was received on 26 June 2014. As a result, the Commission restarted the 20 day period for considering the application in accordance with subsection 269TC(2A).

Following consideration of the application, the Commissioner decided not to reject the application and the Commission initiated an investigation on 11 July 2014. Public notification of initiation of the investigation (public notice) was made in *The Australian* newspaper on that day.

ADN No. 2014/55 provides further details of the investigation and is available on the Commission's website at www.adcommission.gov.au.

In respect of the investigation:

- the investigation period for the purpose of assessing dumping is 1 July 2013 to 30 June 2014; and
- the injury analysis period for the purpose of determining whether material injury has been caused to the Australian industry is from 1 July 2008.

2.2 Previous investigations

An investigation into the dumping of galvanised steel and aluminium zinc coated steel exported to Australia from the People's Republic of China (China), Korea and Taiwan was finalised on 30 April 2013 (refer Trade Measures Report No. 190) (REP 190). As a result of this investigation, a dumping duty notice was published for all exports of galvanised steel from:

- China by all exporters;
- Korea by all exporters, other than Union Steel Co., Ltd;¹² and
- Taiwan by all exporters, other than Sheng Yu Co., Ltd and Ta Fong Steel Co., Ltd.¹³

¹¹ Refer to the full description of the goods in Section 3.2.1 of this report.

¹² On 26 April 2013 the dumping investigation was terminated, in so far as it related to galvanised steel exported by Union Steel Co., Ltd, Sheng Yu Co., Ltd and Ta Fong Steel Co., Ltd, based on a finding that the dumping margins for goods exported by those companies during the investigation period were less than 2% (refer Termination Report No. 190A).

¹³ See above.

An investigation into the subsidisation of galvanised steel and aluminium zinc coated steel exported to Australia from China was finalised on 28 June 2013 (refer Trade Measures Report No. 193) (REP 193). As a result of this investigation, a countervailing duty notice was published for all exports of galvanised steel from China by all exporters other than Angang Steel Company Limited (ANSTEEL)¹⁴ and ANSC TKS Galvanising Co., Ltd. On 11 September 2013, the Anti-Dumping Review Panel revoked the decision to terminate the investigation as it related to ANSTEEL, with the effect of resuming the investigation. After resuming the investigation, the Commissioner subsequently decided to terminate the investigation in relation to ANSTEEL.

It is observed that the goods in REP 190 and REP 193 were limited to zinc coated products of iron and *non-alloy* steel only.

2.3 Responding to this SEF

This SEF represents an important stage in the investigation. It informs interested parties of the facts established and allows them to make submissions in response. It is important to note that this SEF may not represent the final views of the Commissioner.

Interested parties have 20 days to respond to the SEF. The Commissioner will consider these responses before making a final decision to terminate the investigation, or to submit a final report to the Parliamentary Secretary. If the Commissioner does not terminate the investigation, then a final report must be provided to the Parliamentary Secretary by 31 July 2015, recommending whether or not a dumping duty notice should be published, and the extent of any interim duties that are, or should be, payable.¹⁵

Responses to this SEF should be received by the Commissioner no later than **6 July 2015**. The Commissioner is not obliged to have regard to any submission made in response to the SEF received after this date if to do so would, in the opinion of the Commissioner, prevent the timely preparation of the final report to the Parliamentary Secretary (should such a report be made).¹⁶

Submissions should preferably be emailed to operations1@adcommission.gov.au. Alternatively, they may be sent to fax number +61 3 8539 2499, or posted to:

Director, Operations 1
Anti-Dumping Commission
Level 35, 55 Collins Street
MELBOURNE VIC 3000
AUSTRALIA

¹⁴ On 17 June 2013, the countervailing investigation was terminated, in so far as it related to galvanised steel exported by ANSTEEL and ANSC TKS Galvanising Co., Ltd, based on a finding that countervailable subsidisation was negligible (refer Termination Report No. 193(i)).

¹⁵ Subsection 269TEA(1).

¹⁶ Subsection 269TEA(4).

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Confidential submissions must be clearly marked accordingly and a non-confidential version of any submission is required for inclusion on the public record. A guide for making submissions is available at www.adcommission.gov.au.

The public record contains non-confidential submissions by interested parties, the non-confidential versions of the Commission's verification visit reports and other publicly available documents. It is available, by request, in hard copy in Melbourne (phone +61 3 8539 2420 to make an appointment), or online at www.adcommission.gov.au.¹⁷

Documents on the public record should be read in conjunction with this SEF.

2.4 Submissions received from interested parties

The Commission has received numerous submissions from interested parties during the course of the investigation. Each submission (with the exception of one) has been considered by the Commission in reaching the preliminary conclusions contained within this SEF. The exception is with respect to the BlueScope submission of 9 June 2015;¹⁸ the Commissioner is of the opinion that to have regard to this submission would prevent the timely placement of the SEF on the public record.¹⁹ The submissions received are listed in **Non-Confidential Attachment 1** to this report.

¹⁷ Electronic Public Record (EPR) 249 refers.

¹⁸ EPR 249/052 refers.

¹⁹ Subsection 269TDAA(3).

3 THE GOODS AND LIKE GOODS

3.1 Finding

The Commission considers that locally produced galvanised steel is like to the goods under consideration (as defined in Section 3.2.1 of this report).

3.2 The goods

3.2.1 Description

The goods are defined as follows:

'flat rolled iron or steel products (whether or not containing alloys) that are plated or coated with zinc exported to Australia from India and Vietnam'.

These goods are generically called galvanised steel. Galvanised steel of any width is included in this application.

Exclusions

These goods do not include painted galvanised steel, pre-painted galvanised steel, electro-galvanised steel, corrugated galvanised steel or aluminium zinc alloy coated or plated steel.

3.2.2 Additional information

BlueScope's application also provided additional information to support its description of the goods, as follows:

The goods include the same categories of goods as identified in Trade Measures Report No. 190 and 193, however, this application also includes goods that are alloyed (i.e. with minor additions, e.g. boron, chromium, etc). The goods the subject of this application include all zinc coated product options, including all grades/models of zinc coated steel, all coating mass classes and all surface treatments.

Trade or further generic names often used to describe the goods the subject of the application include:

- "GALVABOND®" steel
- "ZINCFORM®" steel
- "GALVASPAN®" steel
- "ZINCHITEN®" steel
- "ZINCANNEAL" steel
- "ZINCSEAL" steel
- Galv
- GI
- Hot Dip Zinc coated steel
- Hot Dip Zinc/Iron alloy coated steel
- Galvanneal

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The amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m²) with the prefix being Z (Zinc) or ZF (Zinc converted to a Zinc/Iron alloy coating). The common coating masses used for zinc coating are: Z350, Z275, Z200/Z180, Z100, and for zinc/iron alloy coatings are ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.

Surface treatments can include but not be limited to; passivated or not passivated (often referred to as chromated or unchromated), oiled or not oiled, skin passed or not skin passed, phosphated or not phosphated (for zinc iron alloy coated steel only).

There are a number of relevant International Standards for zinc coated products that cover their own range of products via specific grade designations, including the recommended or guaranteed properties of each of these product grades.

These relevant standards are noted below in Table A-3.1 “Relevant International Standards for zinc coated steel”.

Table A-3.1 - Relevant International Standards for zinc coated steel

International Standards	Product Grade Names
General and Commercial Grades	
AS/NZS 1397	G1, G2
ASTM A 653/A 653M	CS type A, B and C
EN10346	DX51D, DX52D
JIS 3302	SGCC, SGHC
Forming, Pressing & Drawing Grades	
AS/NZS 1397	G3
ASTM A 653/A 653M	FS, DS type A and B
EN10346	DX53D, DX54D
JIS 3302	SGCD, SGCDL
Structural Grades	
AS/NZS 1397	G250, G300, G350, G450, G500, G550
ASTM A 653/A 653M	33 (230), 37 (255), 40 (275), 50 (340), 55 (380), 80 (550)
EN10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD
JIS 3302	SGC340, SGC400, SGC440, SGC490, SGC570 SGH340, SGH400, SGH440, SGH490, SGH570

3.3 Tariff classification

BlueScope’s application states that galvanised steel is classified to the following tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995*:

- 7210.49.00 (statistical codes 55, 56, 57 and 58);
- 7212.30.00 (statistical code 61);
- 7225.92.00 (statistical code 38); and
- 7226.99.00 (statistical code 71).

The Trade Policy and Advice section of the Australian Customs and Border Protection Service (ACBPS) has confirmed that galvanised steel is correctly classified to these tariff subheadings. The Commission notes that the goods are defined by the description, not the tariff classification.

The general rate of duty is currently 5% for goods imported under these tariff subheadings. However, imports from India and Vietnam are subject to a DCS duty rate which is free for non-alloy steel under 7210.49.00 and 7212.30.00 and is 4% for 'other alloy' steel under 7225.92.00 and 7226.99.00.²⁰

The Commission notes there are numerous tariff concession orders applicable to the relevant tariff subheadings.

3.4 Like goods legislative framework

Paragraph 269TC(1)(b) provides that the Commissioner shall reject an application for a dumping duty notice if, inter alia, the Commissioner is not satisfied that there is, or is likely to be established, an Australian industry in respect of like goods.

In making this assessment, the Commissioner must firstly determine that the goods produced by the Australian industry are 'like' to the imported goods. Subsection 269T(1) defines like goods as:

Goods that are identical in all respects to the goods under consideration or that, although not alike in all respects to the goods under consideration, have characteristics closely resembling those of the goods under consideration.

An Australian industry can apply for relief from material injury caused by dumped imports even if the goods it produces are not identical to those imported. However, the Australian industry must produce goods that are 'like' to the imported goods.

Where the locally produced goods and the imported goods are not alike in all respects, the Commissioner assesses whether they have characteristics closely resembling each other against the following considerations:

- physical likeness;
- commercial likeness;
- functional likeness; and
- production likeness.

3.5 The Commission's assessment – like goods

From the available information, the Commission has identified that BlueScope is the sole Australian producer of 'like goods' (Section 4.1 refers), and is therefore referred to in this report as the Australian industry. BlueScope manufactures galvanised steel in a range of widths, grades, base metal thicknesses (BMTs),²¹ zinc coatings and finishes.

Based on the information currently before it, the Commission has assessed the following in relation to galvanised steel:

²⁰ 'DCS' is a code applied to classes of countries and places in relation to which special rates apply as specified in Part 4 of Schedule 1 to the *Customs Tariff Act 1995*.

²¹ BMT refers to the thickness of the base steel (substrate). Total coated thickness refers to the steel base thickness plus the metallic coating thickness. References to thicknesses in this report are to the BMT.

(i) *Physical likeness*

- products made locally by BlueScope have a physical likeness to the goods exported to Australia from India and Vietnam;
- BlueScope's locally produced galvanised steel and the imported goods are manufactured to Australian and International Standards;

(ii) *Commercial likeness*

- Australian industry galvanised steel competes directly with imported galvanised steel in the Australian market;
- the locally produced goods and imported goods are offered for sale to the market via similar channels, and on similar commercial terms and conditions;

(iii) *Functional likeness*

- the locally produced and imported galvanised steel have comparable or identical end-uses;

(iv) *Production likeness*

- locally produced and imported galvanised steel are manufactured in a similar manner and via similar production processes.

On this basis, the Commission considers that BlueScope's locally-produced galvanised steel is like to the imported goods, and possesses the same essential characteristics as the imported galvanised steel.

Although BlueScope does not manufacture galvanised steel containing alloys, its application stated that other alloy zinc coated products are wholly substitutable with iron and non-alloy zinc coated steel products. BlueScope also submitted evidence that indicated the addition of small amounts of boron has no effect on functionality. The Commission has not received any submissions that dispute this finding.

3.6 Claims by interested parties

3.6.1 Zero spangle steel

The Commission has received several submissions from interested parties throughout the investigation that propose zero spangle galvanised steel products should be excluded from the scope of the investigation, as the Australian industry does not produce like or directly competitive goods to those imports.²²

The term 'spangle' refers to patterns left by zinc on the coated steel. Most galvanised steel products have a spangled surface; however, some manufacturers can produce a zero spangle product that has a smoother surface and no spangle pattern. These products are used predominantly by the automotive industry, but also by non-automotive industries (i.e. for furniture, doorframes or other structures that are decorative or visible, particularly those involving painting).

²² Refer EPR 249/035, 037 and 038.

Interested parties claim that BlueScope does not produce zero spangled steel, and therefore should not be entitled to dumping measures against these products. To the Commission's knowledge, BlueScope does not manufacture a zero spangle product.

In accordance with the approach taken in REP 190, the Commission considers that products with a zero spangle finish fall within the goods description for the investigation, provided those products meet the other specifications stated in the goods description (for example, galvanised coating). Further, there is nothing in the goods description that prevents zero spangle finish galvanised steel from being subject to any measures that might be imposed.

3.6.2 Aluminium zinc coated steel

During an importer verification visit, Toyota Tsusho (Australasia) Pty. Ltd. (Toyota Tsusho) submitted that aluminium zinc coated steel is like to the goods under consideration and should therefore be considered as part of this investigation. Toyota Tsusho stated that BlueScope's aluminium zinc coated steel is produced on the same production line as galvanised steel and that it has similar end-uses, but provides a 3% yield benefit due to its lighter coating weight.²³ This is also the position of the Australian Steel Association Inc., which has asserted that BlueScope sacrifices its sales of galvanised steel, by promoting its Zinalume® product as the superior option in the Australian market.²⁴

Taking into account the approach taken in REP 190 and REP 193, the Commission has elected not to consider aluminium zinc coated steel like to galvanised steel for the purposes of this investigation. The Commission notes that while galvanised and aluminium zinc coated steel were examined together in REP 190 and REP 193, each was considered a separate investigation and were examined separately to assess both dumping/subsidisation and injury to the Australian industry.²⁵

²³ EPR 249/042, page 11 refers.

²⁴ EPR 249/024, page 2 refers.

²⁵ For example, EPR 190/035 page 4 and 190/142, pages 28 and 97-107 refer.

4 THE AUSTRALIAN INDUSTRY

4.1 Finding

The Commission has found that:

- there is an Australian industry consisting of BlueScope that produces like goods in Australia; and
- these like goods are wholly manufactured in Australia.

4.2 Legislative framework

The Commissioner must be satisfied that the like goods are produced in Australia. Subsection 269T(2) of the Act specifies that for goods to be regarded as being produced in Australia, they must be wholly or partly manufactured in Australia. Subsection 269T(3) provides that in order for the goods to be considered as partly manufactured in Australia, at least one substantial process in the manufacture of the goods must be carried out in Australia.

4.3 Production process

In August 2014, a verification team from the Commission undertook a visit to BlueScope's manufacturing facilities in Port Kembla and Springhill, New South Wales. The verification team observed BlueScope's production process of galvanised steel to be as follows:

4.3.1 Hot rolled coil

The main raw materials used in the production of steel are iron ore, coking coal, coke and limestone. The raw materials are fed into the top of the blast furnace in predetermined proportions and sequences. Air that has been heated to around 1200°C is blown into the furnace through nozzles at the lower part of the furnace. This causes the coke to burn, producing carbon monoxide that creates the required chemical reaction. The iron ore is reduced to molten iron by removing the oxygen. Molten iron and slag is drained every two hours through the taphole of the furnace and the molten iron is transported in a torpedo ladle to the basic oxygen steelmaking (BOS) area.

The BOS process creates liquid steel from molten iron, scrap steel and alloying materials. Pure oxygen is blown onto the steel and iron, causing the temperature to rise and thereby melts the scrap, lowers the carbon content of the molten iron and removes unwanted impurities. The steel can be further refined by adding alloy materials that give the steel special properties required by the customer. It is noted that structural steel properties can be achieved via alloy addition; however, BlueScope utilises its processing technology to achieve the required structural properties with low carbon steel.

The molten steel is cast into slabs of various dimensions so that it can be rolled. The rate of casting and speed is dependent on the grade and width being cast. Spray cooling of the slab aids solidification.

After entering the hot strip mill, the slab is reheated to around 1250°C, is descaled and rough rolled to a thickness of 25mm. It is then coiled in a coilbox to retain heat, before

passing through a set of rolling mill stands to finish roll to customer order thickness. The product is control cooled before being finally wound up as a coil of steel (known as hot rolled coil) (HRC). The HRC is then transferred to the Springhill and Western Port coating mills.

4.3.2 Coated steel

Pickling

HRC is pickled to remove scale (iron oxide) that is formed during the hot rolling process. The HRC is unwound, side trimmed to the customers required width and passed through a bath of hydrochloric acid, washed, dried and recoiled. Oil is applied during rewinding to prevent rust.

Cold rolling

The pickled HRC is cold rolled to reduce the steel thickness. The cold rolling process (which involves passing the pickled HRC through a number of rolling mill stands) is conducted at ambient temperature and reduces the HRC to the required customer thickness (0.3mm to 3.5mm). As a result of this process, the steel strength increases and the surface finish becomes bright and smooth. This intermediate steel product is known as a 'cold rolled fully hard' product.

Metal coating

The cold rolled coil is uncoiled and annealed to restore the steel to a soft, usable, ductile form. The coil then passes from the furnace through a molten zinc metal bath where the molten metal chemically bonds to the steel surface. As the coil is vertically withdrawn from the bath, air jets control the resulting coating mass.

Finishes

Those products to be skin-passed undergo light rolling through a skin conditioning mill. This increases the length by 0.25% to 1.25%, which improves the surface of the strip by suppressing (i.e. squashing) spangles and surface defects, to produce a smooth surface for painting, and to suppress or eliminate the yield point.

Galvanised steel is generally supplied with a surface passivation treatment (chromating) that provides a measure of protection for the steel against wet storage damage while in transit to the customer or whilst on-site.

Further processing

BlueScope's service centres are capable of undertaking further processing, such as sheeting, slitting and blanking. BlueScope advised that all orders for galvanised steel less than 600mm in width will be slit, rather than sending narrow coils through the production line individually.

4.4 The Commission's assessment

Based on the above, the Commission is satisfied that galvanised steel is wholly manufactured in Australia.

PUBLIC RECORD

Further, having undertaken verification visits to BlueScope's Port Kembla and Springhill factories, as well as to importers of galvanised steel, the Commission is satisfied that BlueScope is the sole producer of galvanised steel in Australia. Accordingly, the Australian industry consists of BlueScope alone.

5 AUSTRALIAN MARKET

5.1 Finding

The Commission has found that the Australian market for galvanised steel is supplied by the Australian industry and imports, predominantly from India, Japan, Korea, Taiwan, New Zealand and Vietnam.²⁶

5.2 Background

The Commission understands that the galvanised steel market in Australia is primarily driven by the building and construction industry segment (largest by volume) and the smaller manufacturing industry segment.

The market is supplied by imports from India, Japan, Korea, New Zealand, Taiwan, Vietnam and other countries, as well as local production by BlueScope (the only Australian producer). Anti-dumping measures currently apply to non-alloy goods exported from China, Korea and Taiwan (Section 2.2 refers).

5.3 Market structure

5.3.1 Australian producers

The application was lodged by BlueScope, the sole Australian manufacturer of like goods.

BlueScope submitted detailed financial data in its application for the investigation. The Commission undertook verification of this data with BlueScope.²⁷

5.3.2 Importers

Following initiation of the investigation, the Commission examined the ACBPS import database and identified around 25 potential importers of galvanised steel from India and Vietnam.

The Commission sought the cooperation of the five largest importers (by volume) through the completion of an importer questionnaire. Four of those importers fully cooperated with the request, and verification activities were undertaken. These importers are as follows:

- Commercial Metals Pty. Ltd.;
- Mitsubishi Australia Limited;
- Stemcor Australia Pty. Ltd.; and
- Toyota Tsusho.²⁸

²⁶ Based on ACBPS import data for the investigation period.

²⁷ A copy of the verification report is available at EPR 249/020.

²⁸ Copies of these verification reports are available at EPR 249/032, 033, 034 and 042.

The Commission estimates that the above importers collectively account for approximately 64% of total imports from India and Vietnam during the investigation period.

5.4 Market size

To estimate the size of the Australian galvanised steel market, the Commission has combined BlueScope's verified sales data²⁹ with information from the ACBPS import database.

Whilst the ACBPS import database cannot be filtered by product finish (i.e. whether the galvanised steel was painted or unpainted), the Commission has attempted to cleanse the ACBPS import data by reference to the description of the goods provided. The Commission has also cross checked this data during the verification of major importers. As a result, the Commission considers the cleansed ACBPS import data to be a reasonable estimate of import volumes.

The following graph depicts the Commission's estimate of the Australian market size for galvanised steel for the period FY2011 to FY2014. In particular, the Commission estimates that the size of the Australian market for galvanised steel appeared to be above 700,000 tonnes in financial year (FY) 2014.

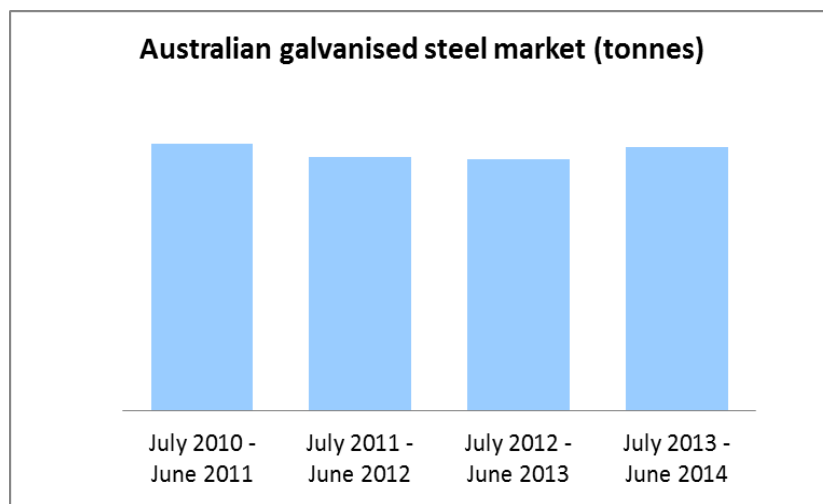


Figure 2 – Australian market for galvanised steel based on ACBPS and BlueScope sales data

The graph above shows that the total Australian market size for galvanised steel has increased by almost 5% since FY2013, although it remained slightly below FY2011.

Data supporting the Commission's assessment of the Australian market size for galvanised steel is at **Confidential Appendix 1**.

²⁹ As outlined in the relevant verification report, this sales data was found to be complete, relevant and accurate; EPR 249/020 refers.

6 DUMPING INVESTIGATION

6.1 Finding

The Commission has found that during the investigation period:

- galvanised steel exported to Australia from India by JSW Coated, POSCO Steel and Uttam Galva was not at dumped prices;
- galvanised steel exported to Australia from India by all exporters other than JSW Coated, POSCO Steel and Uttam Galva was at dumped prices, the dumping margins were not negligible and the volume of dumped goods was not negligible;
- galvanised steel exported to Australia from Vietnam by Hoa Sen was not at dumped prices;
- galvanised steel exported to Australia from Vietnam by all exporters other than Hoa Sen was at dumped prices and the dumping margins were not negligible; and
- the volume of dumped goods exported to Australia from Vietnam was negligible.

The Commission's calculations of export prices, normal values and dumping margins in respect of galvanised steel are at **Confidential Appendix 2**.

The Commission's assessment of dumping margins for galvanised steel exported to Australia from India and Vietnam is summarised below:

Country	Exporter / Manufacturer	Dumping margin
India	Essar Steel India Ltd	7.4%
	JSW Coated	-2.4%
	POSCO Steel	-3.5%
	Uttam Galva	-2.2%
	<i>Uncooperative exporters</i>	14.2%
Vietnam	Hoa Sen	-3.5%
	Nam Kim Steel Joint Stock Company	7.8%
	<i>Uncooperative exporters</i>	7.8%

Figure 3 – Dumping margins – India and Vietnam

6.2 Introduction and legislative framework

This chapter explains the results of the investigation by the Commission into whether galvanised steel was exported to Australia from India and Vietnam at dumped prices during the investigation period.

Dumping occurs when a product from one country is exported to another country at a price less than its normal value. The export price and normal value of goods are determined under section 269TAB and section 269TAC respectively. Dumping margins are determined under section 269TACB.

6.3 Exporters

6.3.1 Responses to the Exporter Questionnaire

Prior to initiation of this investigation, a preliminary search of the ACBPS import database identified around 25 potential suppliers of the goods from India and Vietnam during the investigation period.

Following initiation, the Commission contacted each identified supplier and invited it to complete a response to the Exporter Questionnaire, which requested necessary information to determine whether goods were exported at dumped prices.

The Exporter Questionnaire sought information regarding the exporters' commercial operations and the goods exported to Australia, as well as information regarding the exporters' foreign and domestic sales and relevant costing information.

After notifying suppliers of the opportunity to cooperate with the investigation by providing a response to the Exporter Questionnaire, the Commission received responses from eight parties. This included a response from JSW Steel Ltd (JSW Steel), the parent company of JSW Coated (discussed further at Section 6.4.2 of this report), noting that JSW Steel did not export the goods to Australia during the investigation period and has therefore not been regarded as an exporter for the purposes of this investigation.

6.3.2 Categorisation of exporters

The Commissioner has regarded any exporters that submitted a satisfactorily completed response to the Exporter Questionnaire, within a reasonable period, as cooperative exporters. For the purpose of this investigation, cooperative exporters from India are:

- Essar Steel India Ltd (Essar Steel);
- JSW Coated;
- POSCO Steel; and
- Uttam Galva.

Cooperative exporters from Vietnam are Hoa Sen and Nam Kim Steel Joint Stock Company (Nam Kim).

The Commissioner has regarded any exporters that did not submit a satisfactorily completed response to the Exporter Questionnaire, within a reasonable period, as uncooperative exporters. The uncooperative exporters for the purpose of this investigation are:

- China Steel Sumikin Vietnam Joint Stock Company;³⁰
- Indian Steel Corporation Ltd;³¹ and
- all other exporters of galvanised steel to Australia from India and Vietnam during the investigation period (excluding the cooperative exporters named above).

³⁰ This company did not submit a response to the Exporter Questionnaire by the (extended) deadline.

³¹ This company submitted a response by the (extended) deadline, but the response was not considered complete and accurate: refer EPR 249/026, 029 and 045.

6.3.3 Approach to verification – cooperative exporters

Taking into account the number of exporters that submitted responses to the Exporter Questionnaire, the Commission has chosen to undertake on-site verification for two exporters (one from each of the countries named in the application), being Essar Steel and Hoa Sen. These two entities are responsible for the largest volume of exportations to Australia from each country and, when combined, comprise more than half of all imports from India and Vietnam during the investigation period. In taking a risk based approach, the Commission has considered that it is sufficient to focus its on-site verification activities on the major exporters of galvanised steel from India and Vietnam.

6.3.3.1 Verification of Essar Steel and Hoa Sen

The Commission visited Essar Steel and Hoa Sen to verify the data that each exporter submitted in its response to the Exporter Questionnaire, and to identify and verify any other information relevant to this investigation. Verification reports for both exporters are available on the public record.³²

The Commission used the responses to the Exporter Questionnaire, as well as information gathered and/or verified during the verification visits, to determine individual dumping margins for both exporters.

6.3.3.2 Cooperative exporters other than Essar Steel and Hoa Sen

For cooperative exporters other than Essar Steel and Hoa Sen, exporter-specific export prices, normal values and dumping margins have been calculated using information submitted in the respective responses to the Exporter Questionnaire. As there was no on-site verification completed for these exporter responses, the Commission has tested the data for relevance and reliability by:

- comparing the export price to information contained in the ACBPS import database; and
- benchmarking key variables (such as costs, price and adjustments) to:
 - verified exporters in the current case;
 - other cooperating exporters not verified; and
 - other independent variables.

Having regard to these tests for relevance and reliability, the Commission is satisfied that the information provided in the relevant responses to the Exporter Questionnaire can be relied upon to determine individual dumping margins for these exporters. A Dumping margin calculation report for each exporter is available on the public record.³³

6.3.4 Uncooperative exporters

For those uncooperative exporters outlined in Section 6.3.2, the Commission has had regard to all relevant information to calculate dumping margins. Details regarding

³² EPR 249/047 and 053 refer.

³³ Refer EPR 249/048, 049, 050 and 051.

determination of dumping margins for uncooperative exporters from India and Vietnam can be found at Section 6.6 of this report.

6.4 India

6.4.1 Essar Steel

Export price

The Commission considers that, in respect of Australian export sales during the investigation period:

- the goods have been exported to Australia otherwise than by the importer; and
- the purchases of the goods by the importer were arms length transactions.

In those instances where the goods have been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(a), as the price paid by the importer less transport and other costs arising after exportation.

In those instances where the goods have not been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(c), having regard to all the circumstances of the exportation. These calculations were also based on the price paid by the importer less transport and other costs arising after exportation.

Normal value

For those models where sales were in the ordinary course of trade, and were sold in sufficient volumes, normal values were established in accordance with subsection 269TAC(1) of the Act, using Essar Steel's quarterly weighted average domestic invoice prices for like goods. For the remaining models, normal values were established in accordance with paragraph 269TAC(2)(c),³⁴ using Essar Steel's quarterly weighted average cost to make (CTM) for that model exported to Australia, plus its quarterly weighted average cost to sell (CTS) for that model sold domestically, plus an amount for profit.³⁵

To ensure the normal values were properly compared to export prices, it was necessary to make adjustments, in accordance with subsections 269TAC(8) and (9), for differences in domestic and export prices that were caused by differences in:

- inland freight, handling and other expenses;
- import duties on materials embedded in the costs to make and sell (CTMS);
- commissions; and
- timing of the sales.

³⁴ Taking into account subparagraph 269TAC(2)(a)(i).

³⁵ Profit being measured as a percentage of the CTM.

Dumping margin

The dumping margin for Essar Steel was established in accordance with paragraph 269TACB(2)(a), by comparing quarterly weighted average export prices at free on board (FOB) terms to corresponding quarterly weighted average normal values for the investigation period.

The dumping margin for Essar Steel is **7.4%**.

6.4.2 JSW Coated

Export price

The Commission considers that, in respect of Australian export sales during the investigation period:

- the goods have been exported to Australia otherwise than by the importer; and
- the purchases of the goods by the importer were arms length transactions.

In those instances where the goods have been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(a), as the price paid by the importer less transport and other costs arising after exportation.

In those instances where the goods have not been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(c), having regard to all the circumstances of the exportation. These calculations were also based on the price paid by the importer less transport and other costs arising after exportation.

Normal value

Normal values were established in accordance with subsection 269TAC(1) of the Act, using JSW Coated's quarterly weighted average domestic invoice prices for like goods, by model, where those sales were in the ordinary course of trade, and were sold in sufficient volumes.

To ensure the normal values were properly compared to export prices, it was necessary to make adjustments, in accordance with subsection 269TAC(8), for differences in domestic and export prices that were caused by differences in:

- inland transport, handling and packaging expenses;
- commissions;
- inspection fees; and
- letter of credit discounting.

For the purposes of this SEF, the Commission has calculated normal value using the data provided by JSW Coated only, and has not taken into account information provided by JSW Steel in its response to the Exporter Questionnaire; this is in accordance with the

position already outlined on the public record.³⁶ The Commission has not received any submissions that dispute this position.

Dumping margin

The dumping margin for JSW Coated was established in accordance with paragraph 269TACB(2)(a), by comparing quarterly weighted average export prices (at FOB terms) to corresponding quarterly weighted average normal values for the investigation period.

The dumping margin for JSW Coated is **-2.4%**.

6.4.3 POSCO Steel

Export price

The Commission considers that, in respect of Australian export sales during the investigation period:

- the goods have been exported to Australia otherwise than by the importer; and
- the purchases of the goods by the importer were arms length transactions.

In those instances where the goods have been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(a), as the price paid by the importer less transport and other costs arising after exportation.

In those instances where the goods have not been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(c), having regard to all the circumstances of the exportation. These calculations were also based on the price paid by the importer less transport and other costs arising after exportation.

Normal value

Normal values were established in accordance with subsection 269TAC(1) of the Act, using POSCO Steel's quarterly weighted average domestic invoice prices for like goods, by model, where those sales were in the ordinary course of trade, and were sold in sufficient volumes.

To ensure the normal values were properly compared to export prices, it was necessary to make adjustments, in accordance with subsection 269TAC(8), for differences in domestic and export prices that were caused by differences in:

- inland transport, handling and packaging expenses;
- credit terms; and
- import duties on materials embedded in the CTMS.

³⁶ Refer EPR 249/050, page 5.

Dumping margin

The dumping margin for POSCO Steel was established in accordance with paragraph 269TACB(2)(a), by comparing quarterly weighted average export prices (at FOB terms) to corresponding quarterly weighted average normal values for the investigation period.

The dumping margin for POSCO is **-3.5%**.

6.4.4 Uttam Galva

Export price

The Commission considers that, in respect of Australian export sales during the investigation period:

- the goods have been exported to Australia otherwise than by the importer; and
- the purchases of the goods by the importer were arms length transactions.

In those instances where the goods have been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(a), as the price paid by the importer less transport and other costs arising after exportation.

In those instances where the goods have not been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(c), having regard to all the circumstances of the exportation. These calculations were also based on the price paid by the importer less transport and other costs arising after exportation.

Normal value

Normal values were established in accordance with subsection 269TAC(1) of the Act, using Uttam Galva's quarterly weighted average domestic invoice prices for like goods, by model, where those sales were in the ordinary course of trade, and were sold in sufficient volumes.

To ensure the normal values were properly compared to export prices, it was necessary to make adjustments, in accordance with subsection 269TAC(8), for differences in domestic and export prices that were caused by differences in:

- inland transport and handling expenses; and
- credit terms.

Dumping margin

The dumping margin for Uttam Galva was established in accordance with paragraph 269TACB(2)(a), by comparing quarterly weighted average export prices (at FOB terms) to corresponding quarterly weighted average normal values for the investigation period.

The dumping margin for Uttam Galva is **-2.2%**.

6.5 Vietnam

6.5.1 Hoa Sen

Export price

The Commission considers that, in respect of Australian export sales during the investigation period:

- the goods have been exported to Australia otherwise than by the importer; and
- the purchases of the goods by the importer were arms length transactions.

In those instances where the goods have been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(a), as the price paid by the importer less transport and other costs arising after exportation.

In those instances where the goods have not been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(c), having regard to all the circumstances of the exportation. These calculations were also based on the price paid by the importer less transport and other costs arising after exportation.

Normal value

Normal values were established in accordance with subsection 269TAC(1) of the Act, using Hoa Sen's quarterly weighted average domestic invoice prices for like goods, by model, where those sales were in the ordinary course of trade, and were sold in sufficient volumes.

To ensure the normal values were properly compared to export prices, it was necessary to make adjustments, in accordance with subsection 269TAC(8), for differences in domestic and export prices that were caused by differences in:

- inland freight, handling and packaging expenses;
- credit terms; and
- bank charges.

Dumping margin

The Commission notes that it received a submission from BlueScope on 9 June 2015, relating to matters that may impact the calculation of Hoa Sen's dumping margin.³⁷ This submission will be taken into account following the publication of this SEF.

The dumping margin for Hoa Sen was established in accordance with paragraph 269TACB(2)(a), by comparing quarterly weighted average export prices (at FOB terms) to corresponding quarterly weighted average normal values for the investigation period.

The dumping margin for Hoa Sen is **-3.5%**.

³⁷ EPR 249/052 refers.

6.5.2 Nam Kim

Export price

The Commission considers that, in respect of Australian export sales during the investigation period:

- the goods have been exported to Australia otherwise than by the importer; and
- the purchases of the goods by the importer were arms length transactions.

In those instances where the goods have been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(a), as the price paid by the importer less transport and other costs arising after exportation.

In those instances where the goods have not been purchased by the importer from the exporter, export price has been calculated using paragraph 269TAB(1)(c), having regard to all the circumstances of the exportation. These calculations were also based on the price paid by the importer less transport and other costs arising after exportation.

Normal value

As it was determined there was an absence of sales of like goods in the domestic market that would be relevant for the purpose of determining a price under subsection 269TAC(1),³⁸ normal values were established in accordance with paragraph 269TAC(2)(c), using Nam Kim's quarterly weighted average CTM for Australian export sales, plus its quarterly weighted average CTS for domestic sales, plus an amount for profit.³⁹

To ensure the normal values were properly compared to export prices, it was necessary to make adjustments, in accordance with subsection 269TAC(9), for differences in domestic and export prices that were caused by differences in:

- inland freight, handling and packaging expenses;
- wharfage fees;
- clearance fees;
- fumigation fees; and
- bank charges.

Dumping margin

The dumping margin for Nam Kim was established in accordance with paragraph 269TACB(2)(a), by comparing quarterly weighted average export prices (at FOB terms) to corresponding quarterly normal values for the investigation period.

The dumping margin for Nam Kim is **7.8%**.

³⁸ Subparagraph 269TAC(2)(a)(i).

³⁹ Calculated by taking profit on (profitable) domestic sales, as a proportion of the CTMS.

6.6 Uncooperative exporters

Subsection 269TACAB(1) sets out the provisions for calculating export prices and normal values for uncooperative exporters. The Act specifies that for uncooperative exporters, export prices are to be calculated under subsection 269TAB(3) and normal values are to be calculated under subsection 269TAC(6).

Export price

After having regard to all relevant information, the export prices for uncooperative exporters from India and Vietnam were established separately for each country in accordance with subsection 269TAB(3) of the Act, using the lowest weighted average export price for the entire investigation period from the cooperating exporters, excluding any part of that price that relates to post-exportation charges.

Normal values

After having regard to all relevant information, the normal values for uncooperative exporters from India and Vietnam were established separately for each country in accordance with subsection 269TAC(6) of the Act, using the highest weighted average normal value for the entire investigation period from the cooperating exporters, excluding any favourable downward adjustments made to that figure.

Dumping margin

The dumping margins for uncooperative exporters from India and Vietnam were established in accordance with paragraph 269TACB(2)(a) of the Act, by comparing the weighted average export prices established under subsection 269TAB(3) with the weighted average normal values established under subsection 269TAC(6).

As a result, the dumping margin for uncooperative exporters from India is **14.2%**.

The dumping margin for uncooperative exporters from Vietnam is **7.8%**.

6.7 Volume of dumped exports

Pursuant to subsection 269TDA(3) of the Act, the Commissioner must terminate an investigation if satisfied that the total volume of goods that have been, or may be, dumped is negligible. Subsection 269TDA(4) defines a negligible volume as less than 3% of the total volume of goods imported into Australia over the investigation period.

As outlined in Section 5.4 of this report, the Commission has estimated the size of the Australian galvanised steel market. Based on this information, the Commission is satisfied that, when expressed as a percentage of the total imported volume of the goods during the investigation period, the volume of allegedly dumped goods from:

- India was greater than 3% and therefore not negligible; and
- Vietnam was less than 3% and therefore negligible.

7 ECONOMIC CONDITION OF THE INDUSTRY

7.1 Finding

Having regard to the information contained in the application and the information obtained and verified during this investigation, the Commission considers that the Australian industry has experienced:

- price depression;
- price suppression;
- reduced profits and profitability; and
- reduced return on investment.

7.2 Introduction

This chapter outlines the economic condition of the Australian industry and an assessment as to whether the industry has suffered injury.

7.3 Commencement of injury and analysis period

BlueScope's application stated that REP 190 found the Australian industry had suffered material injury in FY2012 from dumped and subsidised exports of galvanised steel (not containing alloys) from China, Korea and Taiwan. Following the imposition of measures, BlueScope claimed that dumped exports of galvanised steel from India and Vietnam emerged (relative to negligible volumes observed in 2011-12 and 2012-13).⁴⁰ It is BlueScope's position that injury from dumped exports from India and Vietnam has displaced the injurious exports from China, Korea and Taiwan, resulting in a continuation of material injury to the Australian industry in 2013-14.⁴¹

The Commission has examined the Australian market and the economic condition of the Australian industry from 1 July 2008 for the purposes of its injury analysis.

7.4 Approach to injury analysis

The injury analysis detailed in this section is based on financial information submitted by BlueScope, as well as data from the ACBPS import database.

The information provided by BlueScope, and verified by a team from the Commission,⁴² was used as the primary basis for assessing BlueScope's claims of injury caused by the alleged dumping of galvanised steel.

⁴⁰ Assessment in the application based on an April-March year.

⁴¹ Based on an April-March year.

⁴² The visit team found that BlueScope's sales and cost data was a reasonably complete, relevant and accurate reflection of the sale and actual cost to manufacture and sell galvanised steel during the period 1 July 2008 to 30 June 2014; refer report at EPR 249/020. Accordingly, the Commission found that BlueScope's sales and cost data was suitable for analysing the economic performance of its galvanised steel operations from 1 July 2008 to 30 June 2014.

The Commission has received a number of submissions addressing the injury claims of the Australian industry. In particular, these submissions used the financial position of BlueScope, as described in annual reports and other published materials, as well as the noted improvements to particular injury indicators, to allege that BlueScope did not suffer injury caused by dumping.⁴³ These submissions are addressed in the relevant sections of this Chapter.

7.5 Volume trends

BlueScope has not claimed that the Australian industry suffered material injury in relation to loss of sales volume or market share. Rather, the Commission noted that BlueScope experienced increased production, sales volume and market share in FY2014 (as discussed in Sections 7.6.1 and 7.6.2 below).

7.5.1 Sales volume

The following graph shows BlueScope's total sales volume for galvanised steel in the Australian market since July 2008.

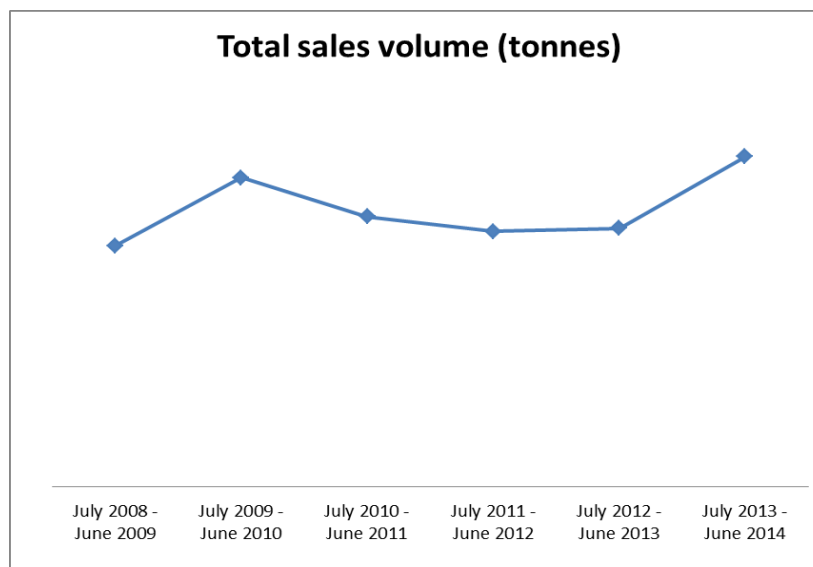


Figure 4 – domestic sales volume of galvanised steel

This graph shows that BlueScope's domestic sales volumes of galvanised steel has noticeably increased in FY2014 and is above levels in FY2010.

The Commission also assessed sales volume trends for particular BlueScope product groupings with the highest sales volume,⁴⁴ in addition to an 'other' category. In summary, the Commission observed there was an increase in volume across most product groups in FY2014, with the exception of one.

⁴³ For example, refer submissions at EPR 249/018, 028, 035, 037 and 038.

⁴⁴ These product groups represented approximately two-thirds of all galvanised steel sales.

7.5.2 Market share

The following graph shows changes in the domestic market share between BlueScope and importing countries using data from the ACBPS import database and BlueScope's sales data for the period FY2011 to FY2014.

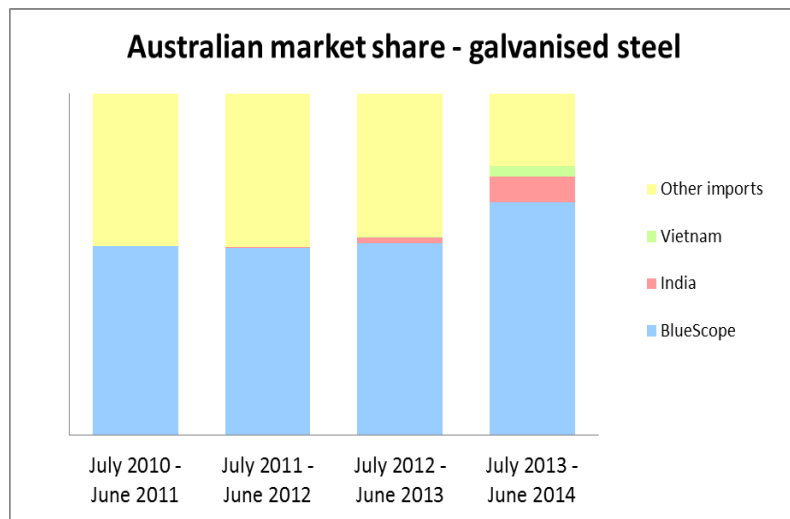


Figure 5 – Australian market share based on ACBPS and BlueScope sales data

The above graph shows that BlueScope's share in the Australian galvanised steel market increased in FY2014, after remaining relatively constant since FY2011. The graph also shows that there was a marked increase in the market share of imports from India and Vietnam in FY2014.

In noting that the market shares of India, Vietnam and BlueScope all increased in FY2014, the Commission also observed that this was offset, in the main, by a corresponding reduction in the market shares attributable to China, Korea and Taiwan, with BlueScope appearing to gain a significant proportion of the share previously allocated to those countries.

7.5.3 Conclusion – volume trends

Based on this analysis, and consistent with BlueScope's assessment, the Commission considers there is no evidence of injury to the Australian industry in the form of loss of sales volume or market share.

7.6 Price effects

7.6.1 Price depression and suppression

In its application BlueScope claimed the Australian industry suffered material injury in the form of price suppression, but not in the form of price depression. BlueScope alleges that the price suppression experienced by the Australian industry has been due to dumped exports undercutting the Australian industry's selling prices.

Price depression occurs when a company, for some reason, lowers its prices. Price suppression occurs when price increases, which otherwise would have occurred, have

been prevented. An indicator of price suppression may be the margin between revenues and costs.

The following graph shows the trends in BlueScope's unit price and unit CTMS for galvanised steel from FY2009 to FY2014.

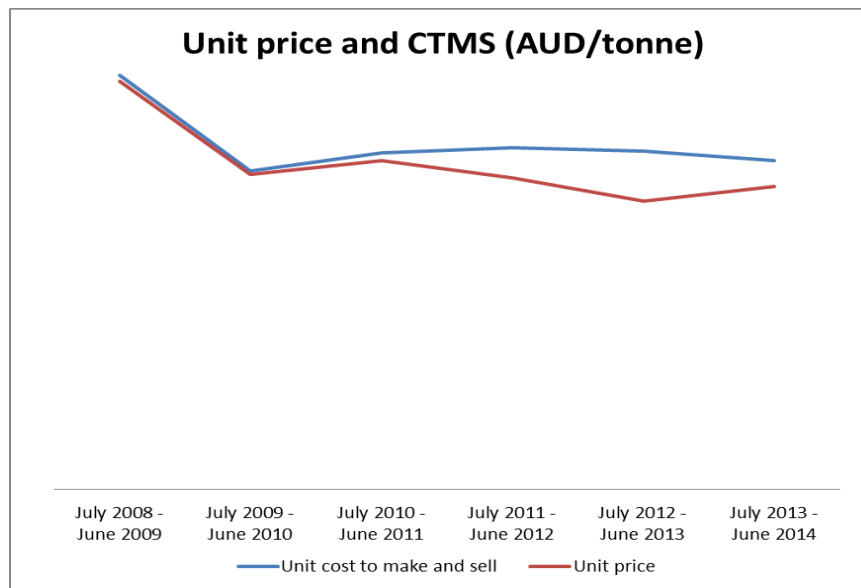


Figure 6 – BlueScope's galvanised steel unit price and cost

The graph above shows that unit price has increased in FY2014; however, it is still lower than the first four years of the injury analysis period, indicating price depression.

The graph also shows that between FY2011 and FY2013 BlueScope's unit price decreased significantly relative to unit cost, and by the end of that period there was a notable margin between the two. Although the unit CTMS has decreased slightly in FY2014, while the unit price has increased, unit price still remains below unit cost, indicating price suppression.

The Commission also assessed price suppression in relation to particular BlueScope product groupings with the highest sales volume,⁴⁵ in addition to an 'other' category. In summary, the Commission observed there was a notable margin between unit price and cost across most product groups, with the exception of one where price suppression was no longer evident.

⁴⁵ These product groups represented approximately two-thirds of all galvanised steel sales.

7.6.2 Conclusion – price effects

Based on this analysis, the Commission considers that the Australian industry has experienced price depression and price suppression. Although the extent of the price depression and the price suppression appears to have improved during the investigation period, the Commission does not believe that this, of itself, precludes a finding that price depression and price suppression has been experienced by the Australian industry.

7.7 Profit and profitability

In its application BlueScope claimed that, as a consequence of price suppression in 2012-13 and 2013-14, the Australian industry's profit and profitability declined and in 2013-14 remained below the profit and profitability achieved in 2011-12.⁴⁶

BlueScope claimed that dumped imports from India and Vietnam have undercut the Australian industry's selling prices, resulting in price suppression and therefore reduced profit and profitability.

The following graph shows trends in BlueScope's profit and profitability⁴⁷ from FY2009 to FY2014.

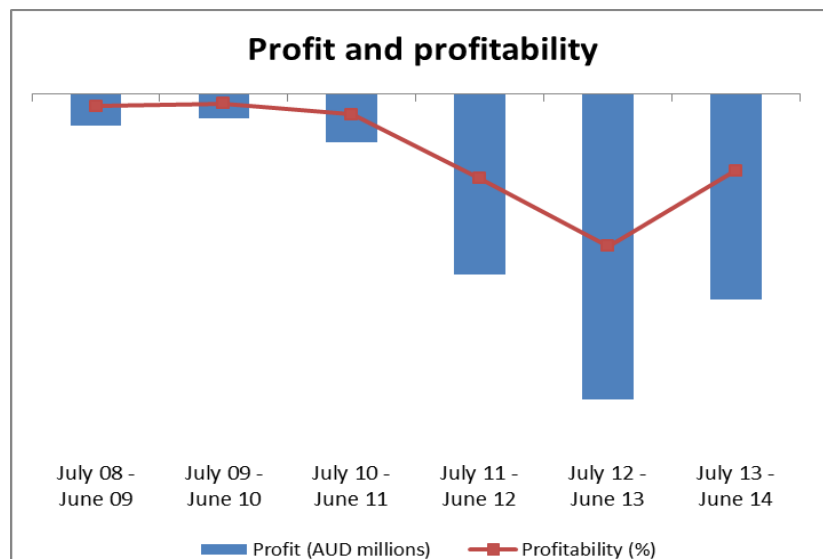


Figure 7 – BlueScope's total profit and profitability for galvanised steel

The graph above shows a continuing (and considerable) decrease in BlueScope's profit and profitability since FY2010, particularly in FY2013. Although profit and profitability noticeably improved in FY2014 (the investigation period) relative to FY2013, BlueScope still made a considerable loss in that year.

⁴⁶ Assessment based on an April-March year.

⁴⁷ As a percentage of sales revenue.

7.7.1 Conclusion – profit and profitability

Based on this analysis, the Commission considers that the Australian industry has experienced reduced profit and profitability. Although the degree of the loss experienced by BlueScope improved during the investigation period, the Commission does not believe that this, of itself, precludes a finding that reduced profit and profitability has been experienced by the Australian industry.

7.8 Other economic factors

BlueScope has also claimed that the Australian industry experienced injury in respect of other economic/injury factors, including reduced return on investment, reduced employment numbers and reduced ability to raise capital for re-investment. In support of its claim of injury, BlueScope provided information pertaining to numerous other economic factors from FY2009 to FY2014. These factors were assessed as part of the Australian industry verification visit.⁴⁸

7.8.1 Reduced return on investment

BlueScope's return on investment was observed to decrease between FY2010 and FY2013. Although there was an improvement in FY2014 (the investigation period), it remained a negative return.

Based on this analysis, the Commission considers that the Australian industry has experienced reduced return on investment. Further to particular findings outlined above, while return on investment improved during the investigation period, the Commission does not believe this, of itself, precludes a finding that reduced return on investment has been experienced by the Australian industry.

7.8.2 Reduced ability to raise capital for re-investment

BlueScope's reduced ability to raise capital for re-investment was discussed during the Australian industry verification visit.⁴⁹

The Commission has insufficient evidence to support BlueScope's claims for injury based on reduced ability to raise capital for re-investment.

7.8.3 Reduced employment numbers

Since FY2009, employment relating to galvanised steel production (measured in number of persons) has decreased overall, although there was an improvement in FY2014. By the end of the period it remained slightly lower than the reported level in FY2012 (the investigation period for REP 190).

Following the Australian industry verification visit, the Commission concluded that it has insufficient evidence to support BlueScope's claims for injury based on reduced employment numbers.

⁴⁸ Refer report at EPR 249/020, pages 48-9.

⁴⁹ EPR 249/020, page 49 refers.

7.8.4 Additional observations

In addition to the observations outlined above, the Commission has noted that the following injury indicators improved across the period FY2009 to FY2014:

- capacity utilisation;
- productivity (measured in tonnes per employee);
- capital investment; and
- total, as well as average, wages paid to employees involved in the production of galvanised steel.

The Commission has received several submissions from interested parties that argue injury should be considered by taking into account the overall economic condition of the Australian industry to properly consider if injury is material.⁵⁰ This would include consideration of the improved indicators listed above, as well as the improvements in sales volume and market share outlined in Sections 7.6.1 and 7.6.2, against the findings pertaining to price suppression, reduced profit and profitability and reduced return on investment.

The Commission does not consider that improvements in relation to particular economic factors, of itself, precludes a finding that the Australian industry has been injured in respect of other factors. This is consistent with the Ministerial Direction on material injury (dated 27 April 2012), which states that ‘... [a] material injury assessment involves a range of factors that are considered together; no one or several of these factors can necessarily give decisive guidance’.

⁵⁰ For example, refer submissions at EPR 249/009 and 028.

8 HAS DUMPING CAUSED MATERIAL INJURY?

8.1 Finding

The Commissioner has found that the injury, if any, to BlueScope caused by the dumping of goods exported to Australia from India is negligible.

8.2 Introduction

The Commission has found that, during the investigation period, some exports of galvanised steel to Australia from India were dumped. The Commission has also found that the Australian industry experienced price suppression, reduced profits and profitability and reduced return on investment.

This section examines whether exports of galvanised steel to Australia from India, at dumped prices, have caused material injury to the Australian industry producing like goods.

Section 269TAE outlines the factors that the Parliamentary Secretary may take into account in determining whether material injury to an Australian industry has been, or is being, caused or threatened.

8.3 Size of the dumping margins

Paragraph 269TAE(1)(aa) states that in determining whether material injury has been caused by dumping the Parliamentary Secretary may have regard to the size of each of the dumping margins, worked out in respect of goods of that kind that have been exported to Australia at dumped prices.

As outlined in Section 6.1, Essar Steel was found to have exported galvanised steel to Australia from India during the investigation period at a dumping margin of 7.4%, and uncooperative exporters were found to have exported the goods at a dumping margin of 14.2%. All other exporters of the goods to Australia from India were not dumping in the investigation period.

The Commission considers that dumping margins of this magnitude are sufficient to provide importers of such goods with a competitive advantage on price when the goods are sold in the Australian market. In a price sensitive market (Section 8.5.2 refers), it follows that such levels of dumping have the potential to cause injury to the Australian industry through adverse price, volume and profit effects.

8.4 Quantity of the dumped goods

Paragraph 269TAE(1)(a) states that in determining whether material injury has been caused by dumping the Parliamentary Secretary may have regard to the quantity of goods of that kind that, during a particular period, have been or are likely to be exported to Australia from the country of export.

The Commission found that, during the investigation period, the volume of dumped goods exported to Australia from India⁵¹ exceeded 3% of the total Australian import volume and was therefore not negligible. The Commission notes that, when measured as a percentage of the total Australian galvanised steel market in that same period, the volume of dumped goods from India represented somewhere between 4% to 5% of the total market volume.

The Commission considers that it is possible for the prices of goods that represent 4% to 5% of the total market to influence prevailing market prices, particularly when taken in the context of BlueScope's import parity pricing (IPP) policy (as discussed in Section 8.5.1 below). However, observations made in the price undercutting analysis at Section 8.5.3 suggest that other products, which represent a higher proportion of the total market, could also be of influence in BlueScope's application of its IPP policy.

8.5 Pricing

Paragraph 269TAE(1)(e) of the Act states that the Parliamentary Secretary may have regard to the difference between:

- (i) the price that has been, or is likely to be, paid for goods of that kind, or like goods, produced or manufactured in the Australian industry and sold in Australia; and
- (ii) the price that has been, or is likely to be, paid for goods of that kind exported to Australia from the country of export and sold in Australia.

In addition, paragraph 269TAE(1)(f) states that the Parliamentary Secretary may have regard to the effect that the exportation of goods of that kind to Australia from the country of export in those circumstances has had, or is likely to have, on the price paid for goods of that kind, or like goods, produced or manufactured in the Australian industry and sold in Australia.

8.5.1 IPP

As discussed in the report for the Australian industry verification visit,⁵² the Commission is satisfied that BlueScope's pricing in the investigation period was based on an IPP policy, whereby it took into account the market price of the goods using contemporary price information for equivalent imported products. BlueScope used prices gathered from the import market (including from India) to determine the selling price of its goods, with a view to selling at prices considered competitive with imports. As such, galvanised steel can be said to have a market based price, as opposed to a cost based price.

The data provided by BlueScope to demonstrate how it calculated its selling prices during the investigation period included details of the competitive offers gathered from the import market, including details of the relevant country (in all cases) and the exporter (in most cases).

⁵¹ Taking into account Essar Steel, as well as uncooperative exporters.

⁵² EPR 249/020, pages 29 and 51-2 refer.

BlueScope claims that because the price of imports is a key determinant of its selling price, it directly causes price injury resulting in lost revenue and profits.

8.5.2 Price sensitivity

The Commission found that it is not uncommon for purchasers of galvanised steel to procure supply from more than one source, including a combination of imported and domestically produced galvanised steel. As a result, galvanised steel purchasers have the ability to compare prices of domestically produced product with imported product, and there is evidence that indicates the prices of imported galvanised steel are regularly used as leverage in price negotiations with BlueScope.

In this context, the Commission considers that the market for galvanised steel in Australia is price sensitive.

8.5.3 Price undercutting

The Commission has undertaken an analysis of price undercutting claims by BlueScope, noting that price undercutting occurs when imported product is sold at a price below that of the Australian manufactured product.

In conducting this analysis, the Commission has compared weighted average free into store (FIS) prices in Australian dollars (AUD) (per tonne) of imported galvanised steel sold by importers, to BlueScope's delivered net selling price (AUD per tonne), at a comparable level of trade.

To do this, the Commission has used verified domestic sales data of BlueScope's manufactured goods during the investigation period, as well as verified sales data from importers visited by the Commission. The data is sufficiently detailed to enable the Commission to compare Australian selling prices in the investigation period for:

- BlueScope;
- dumped goods from India (with a focus on Australian sales of Essar Steel products, which account for the major proportion of dumped goods from India);
- undumped goods from India (being Australian sales of JSW Coated, POSCO Steel and Uttam Galva products); and
- undumped goods from Vietnam (being Australian sales of Hoa Sen products).

As outlined in Section 8.5.3.4, the Commission has also compared the above prices to Australian selling prices in the investigation period for:

- galvanised steel exported to Australia from countries already subject to anti-dumping measures (being China, Korea and Taiwan); and
- galvanised steel containing alloys exported to Australia from certain countries.

These prices have been constructed from the ACBPS import database by taking the sum of FOB export prices, amounts for duty and dumping duty (where relevant) and estimated amounts for overseas freight, into-store costs and gross margins for importers ascertained from verified importer data for the previous dumping investigation.

The Commission's price undercutting analysis is at **Confidential Appendix 3**.

8.5.3.1 Comparison of aggregate weighted average FIS prices

A comparison of aggregate weighted average FIS prices means that sales values of all galvanised steel products for any given supplier have been included in each weighted average calculation of Australian selling prices. Because of this, variations in product mix may contribute to price differences.

This comparison showed that Essar Steel products were sold in Australia at prices that undercut BlueScope in each month at rates between 7% and 16%, which was, in most months, greater than the undercutting identified for uncooperative exporters from India.

The comparison also showed that undumped goods from India and Vietnam were sold in Australia at prices that undercut BlueScope in each month at rates between 1% and 14%.

8.5.3.2 Comparison of weighted average FIS prices for selected products

A comparison of weighted average FIS prices for selected products was conducted to minimise the potential for any price differences, such as those resulting from different product mixes, to affect the analysis above. In order to conduct this comparison meaningfully, the Commission has identified products of a certain grade, coating mass and BMT range.⁵³ The data was sufficiently detailed for this analysis to be conducted with respect to Australian sales of BlueScope and Essar Steel products only.

This comparison showed that Essar Steel products were sold in Australia at prices that undercut BlueScope in each month at rates between 2% and 12%.

The Commission notes that the grade and coating mass criteria for the selected products matched one of BlueScope's base products for its IPP pricing model (Section 8.5.1 refers).

8.5.3.3 Comparison of weighted average FIS prices for selected products by customer

As a further refinement of the price comparisons detailed above, the Commission has also compared the prices of selected products to customers that were common to BlueScope and to Australian suppliers of Essar Steel products. Due to the absence of sales data in some months, the analysis was conducted on a quarterly weighted average basis.

This comparison showed that Essar Steel products were sold in Australia at prices that undercut BlueScope in all three quarters at rates between 5% to 17%, noting there was insufficient data for the other quarter.

8.5.3.4 Comparison of aggregate weighted average FIS prices for imported goods from other countries

A comparison of aggregate weighted average FIS prices for imported goods from other countries with BlueScope's prices was also considered relevant, given the significant

⁵³ These products represented more than one third of BlueScope's sales.

volume of galvanised steel supplied from sources other than India and Vietnam in the investigation period.

This comparison showed that FIS prices constructed from the ACBPS import database for Taiwan (responsible for the largest proportion of total imports during the investigation period), undercut BlueScope's selling prices at rates that were, in the majority of cases, greater than the rates of undercutting already identified for Essar Steel.

It is noted that this comparison also showed that Australian selling prices constructed for China and Korea were not undercutting BlueScope's prices during the investigation period, and that volumes from these countries were significantly lower than Taiwan during the investigation period.

In conducting this analysis, the Commission used constructed Australian selling prices of goods exported from China, Korea and Taiwan in relation to:

- galvanised steel subject to anti-dumping measures;
- galvanised steel not subject to anti-dumping measures; and
- galvanised steel containing alloys.

Whilst the ACBPS import database cannot further distinguish the different product mixes imported to Australia and is therefore limited in its application, the Commission considers that this analysis provides a reasonable indication that prices other than those of dumped goods from India may be influencing the prevailing market prices in Australia, including those for BlueScope. In particular, the volume and prices of goods from Taiwan appear to be significant in this regard.

8.5.3.5 Conclusion – price undercutting

Whilst the comparisons undertaken by the Commission in the preceding sections indicated a level of price undercutting at the aggregate, product and customer levels for dumped goods imported from Essar Steel, it was found that similar, or in some cases more extensive, undercutting was also evident during the investigation period in relation to undumped imports from India and Vietnam, and in relation to countries already subject to anti-dumping measures.

8.6 Injury caused by factors other than dumping

Subsection 269TAE(2A) of the Act states that the Parliamentary Secretary must consider whether any injury to an industry, or hindrance to the establishment of an industry, is being caused or threatened by a factor other than the exportation of those goods and any such injury or hindrance must not be attributed to the exportation of those goods.

The Commission has considered all factors outlined in subsection 269TAE(2A), and has also examined other potential causes of injury to BlueScope, other than dumped goods exported from India.

8.6.1 Competition with undumped goods and goods from countries already subject to anti-dumping measures

The price undercutting analysis detailed in Section 8.5.3 above, demonstrates that BlueScope has been experiencing a significant degree of competition on price from undumped goods from India and, in particular, from Vietnam. BlueScope has also been experiencing significant competition on price from goods exported to Australia from countries already subject to anti-dumping measures. The aggregate volume of these two categories of goods was significantly greater than the volume of dumped goods from India in the investigation period, and the Australian selling prices of these two categories of goods were often lower than the Australian selling prices for the dumped goods from India.

In these circumstances, the Commission considers that the dumped goods from India have not caused material injury to BlueScope in terms of adverse price or volume effects.

8.6.2 Increase in imports of galvanised steel containing alloys

Review of the ACBPS import database indicates that volumes of galvanised steel containing alloys have increased significantly since the implementation of anti-dumping measures on galvanised steel not containing alloys (REP 190). The Commission has found that the volumes of such goods in the investigation period are similar to the volume of dumped goods from India in that period.

The Commission considers there is a possibility that these imports may have contributed to the price pressures experienced by BlueScope, given these goods are not subject to anti-dumping measures; however, it leaves this issue to be addressed by the anti-circumvention inquiry currently in progress.⁵⁴

8.6.3 The Australian industry's distribution strategy

During an importer verification visit, Toyota Tsusho submitted that BlueScope's distribution strategy, whereby it elects to only sell products direct to particular distributors, results in customers (particularly those in competition with BlueScope's downstream operations) having to seek alternative channels of supply from imports to remain competitive.⁵⁵

The Commission understands that some purchasers of galvanised steel might be prevented from acquiring Australian manufactured galvanised steel at a point in the supply chain that is satisfactory to them (i.e. direct from BlueScope, rather than via its distribution networks), thereby influencing those purchasers to seek imported sources of galvanised steel. However, the Commission considers that it is open to BlueScope to focus its sales towards certain customers in order to maintain the viability of its distributors with which it has contractual and commercial agreements in place.

⁵⁴ EPR 290 refers.

⁵⁵ EPR 249/042, page 23 refers.

8.6.4 Decline of automotive industry

The Commission has received submissions from interested parties that claim four of the 11 galvanised steel products listed as the goods (and outlined in Section 3.2.2) are used almost exclusively for the automotive sector. As such, the decline in overall market conditions due to cessation of automotive manufacture should not be attributable to galvanised steel from India and Vietnam, given that galvanised steel from those countries is not used for automotive purposes.⁵⁶

The Commission notes that the goods listed in Section 3.2.2 outline the different generic and trade names that are used to describe the goods the subject of the application. These names have been provided by BlueScope for background information, and the fact four of those names relate to products used almost exclusively for the automotive sector is not taken to be an indication of the importance those products have to BlueScope's overall domestic sales of galvanised steel, particularly in light of its increasing sales volumes.

8.7 Conclusion – has dumping caused material injury?

The Commission has found that, during the investigation period, BlueScope experienced price competition from dumped goods from India, as well as from undumped goods from India and Vietnam, and from goods exported to Australia from countries already subject to anti-dumping measures.

After having regard to the relative prices and volumes of these goods, the Commissioner considers that the Australian selling prices of dumped goods from India were not significantly influencing BlueScope's selling prices, or the prevailing market prices in Australia.

The Commission also took into account the specific evidence provided by BlueScope to substantiate examples where it faced pressure to lower its prices to compete with imported goods. Whilst this evidence (not used in the price undercutting analysis, in preference to verified data) does indicate that the Australian industry faced price competition with dumped goods from India, it also indicates that BlueScope faced price pressure with undumped goods from India and Vietnam, and with goods from countries already subject to anti-dumping measures. It is the Commission's view that these other imported products, which are of greater volume than the dumped goods, are of greater influence in BlueScope's application of its IPP policy.

Accordingly, the Commissioner is satisfied that dumped goods from India have not materially influenced BlueScope's prices and have not (as highlighted by Section 7.5.1) caused BlueScope to experience reduced sales volumes. It follows that the dumped goods from India have not caused BlueScope to experience adverse profit effects.

Taking this into account, the Commissioner has found that the injury, if any, to BlueScope caused by the dumping of goods exported to Australia from India is negligible.

⁵⁶ For example, refer EPR 249/018.

9 APPENDICES AND ATTACHMENTS

Confidential Appendix 1	Market size analysis, FY2011 to FY2014
Confidential Appendix 2	Export price, normal value and dumping margin calculations
Confidential Appendix 3	Price undercutting analysis
Non-Confidential Attachment 1	List of submissions received from interested parties

ATTACHMENT 1 – INTERESTED PARTY SUBMISSIONS

EPR No.	Title of Submission	Party Making Submission	Date Received
006	<i>None provided</i>	Thunderbox Toolboxes	30/07/2014
009	<i>Comments on application for dumping duties of flat rolled iron or steel products that are plated or coated with zinc exported to Australia from India and Vietnam under HS No.: 7210.49.00 (statistical codes 55, 56, 57 and 58), 7212.30.00 (statistical code 38) and 7226.99.00 (statistical code 71) of Schedule 3 to the Customs Tariff Act 1995</i>	Hoa Sen Group	26/08/2014
018	<i>Zinc coated (galvanised) steel exported from India and Vietnam: ADC case 249</i>	Australian Steel Association Inc.	05/09/2014
022	<i>Galvanised zinc steel exported from India and Vietnam – submission by Australian Steel Association Inc.</i>	BlueScope Steel Limited	23/09/2014
023	<i>Investigation no. 249 – zinc coated (galvanised) steel exported from India and Vietnam – cooperative exporters and public file</i>	BlueScope Steel Limited	26/09/2014
025	<i>Investigation no. 249 – zinc coated (galvanised) steel exported from India and Vietnam – submission by Hoa Sen Group</i>	BlueScope Steel Limited	13/10/2014
028	<i>Alleged material injury to the Australian galvanised steel industry, and its causation</i>	Moulis Legal on behalf of Essar Steel India Ltd	06/11/2014
030	<i>Investigation no. 249 – zinc coated (galvanised) steel exported from India and Vietnam – BlueScope submission re Preliminary Affirmative Determination and extension to Statement of Essential Facts</i>	BlueScope Steel Limited	14/11/2014
031	<i>Investigation no. 249 – zinc coated (galvanised) steel exported from India and Vietnam – BlueScope comments re submission by Essar Steel India Ltd</i>	BlueScope Steel Limited	14/11/2014
035	<i>Alleged material injury to the Australian galvanised steel industry, and its causation</i>	Moulis Legal on behalf of POSCO Maharashtra Pvt Ltd	19/12/2014
037	<i>Anti-dumping investigation concerning imports of zinc coated (galvanised) steel from India and Vietnam – injury submission</i>	Economics Law Practice on behalf of Uttam Galva Steels Limited	23/01/2015
038	<i>Anti-dumping investigation concerning imports of zinc coated (galvanised) steel from India and Vietnam – injury submission</i>	Economics Law Practice on behalf of JSW Steel Coated Products Ltd/JSW	23/01/2015

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		Steel Limited (JSW Group)	
039	<i>Investigation no. 249 – zinc coated (galvanised) steel exported from India and Vietnam – BlueScope comments re submission by POSCO Maharashtra Steel Pvt Ltd</i>	BlueScope Steel Limited	02/02/2015
040	<i>Investigation no. 249 – zinc coated (galvanised) steel exported from India and Vietnam – BlueScope comments re submission by JSW Steel Coated Products Ltd/JSW Steel Limited (JSW Group) and Uttam Galva Steels Limited</i>	BlueScope Steel Limited	04/02/2015
044	<i>Indian Steel Corporation: uncooperative exporter status, ADC investigation into alleged dumping of zinc coated (galvanised) steel exported to Australia from India and Socialist Republic of Vietnam</i>	Rockwell Olivier on behalf of Indian Steel Corporation Limited	06/01/2015
052	<i>Investigation no. 249 – zinc coated (galvanised) steel exported from India and Vietnam – BlueScope comments re Hoa Sen Group exporter visit report</i>	BlueScope Steel Limited	09/06/2015
054	<i>Further submission concerning Australian industry's material injury allegations</i>	Moulis Legal on behalf of Essar Steel India Ltd	10/06/2015