



PUBLIC RECORD
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30 January 2017

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

Public File

Dear Sir/Madam,

Re Investigation No. 370 – Galvanised steel exported from India, Malaysia and Vietnam

I. Introduction

BlueScope Steel Limited (“BlueScope”) is the applicant company requesting the imposition of anti-dumping measures on exports of galvanised steel from India, Malaysia and Vietnam, and countervailing measures on exports from India and Vietnam.

BlueScope takes this opportunity to provide the Anti-Dumping Commission (“the Commission”) with a detailed submission concerning the material injury experienced by the Australian industry in the 2015/16 investigation period that BlueScope considers can be attributed to the injurious exports from India, Malaysia and Vietnam.

II. Price undercutting

BlueScope included at Part A-9.2 of its application evidence of price undercutting from each of the exporting countries. The level of price undercutting ranged between [X] and [X] per cent. The examples provided included galvanised steel competing with G2 galvanneal (ex India), G2 galvanised (ex India, Malaysia and Vietnam), and G450 galvanised steel purlin grades (ex Malaysia and Vietnam).

BlueScope has included with this submission detailed analysis (refer Confidential Attachment 1) of the eleven price undercutting examples included in the application (at Part A-9.2). This additional information includes details of volumes and price by customer [*Confidential Attachment 1 confidential details*].

The following summarizes the attached information for each example:

(i) [Redacted] [Price undercutting example summary]

(ii) [Redacted] [Price undercutting example summary]

- (iii) [Redacted] [Price undercutting example summary]
- (iv) [Redacted] [Price undercutting example summary]
- (v) [Redacted] [Price undercutting example summary]
- (vi) [Redacted] [Price undercutting example summary]
- (vii) [Redacted] [Price undercutting example summary]
- (viii) [Redacted] [Price undercutting example summary]
- (ix) [Redacted] [Price undercutting example summary]
- (x) [Redacted] [Price undercutting example summary]
- (xi) [Redacted] [Price undercutting example summary]

The price undercutting examples supplied by BlueScope (with further evidence included at Confidential Attachment 1) demonstrate that during 2015/16 BlueScope encountered price depression and price suppression from the dumped (and subsidised) exports as it responded to competitive offers to maintain or secure sales of galvanised steel.

III. Quantification of material injury

The price undercutting examples evidenced above contributed to:

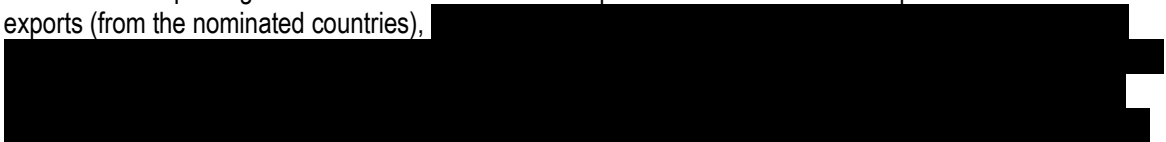
- (a) Lost sales volumes to exports from India, Malaysia and Vietnam; and

- (b) Price injury through price reductions that impacted a significant proportion of the total Australian market for galvanised steel.

BlueScope has quantified the impact of the injury sustained across the 2015/16 investigation period. The injury quantification has been analysed on a volume and price effect basis.

(a) Volume-effect injury

BlueScope has analysed the injurious exports from India, Malaysia and Vietnam, and categorised the volumes according to the grade of galvanised steel – i.e. G2 ZINCANNEAL®, G2 GALVABOND®, or G450 GALVSPAN® purlin grade. On the basis that BlueScope has lost sales to the dumped and/or subsidised exports (from the nominated countries),



[Confidential volume injury effect considerations].

(i) India Volume Injury

[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]

(ii) Malaysia Volume Injury

[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]

(iii) Vietnam Volume Injury

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

(iv) Total Volume Injury

The aggregate volume injury from the dumped and subsidised exports of galvanised steel from India, Malaysia and Vietnam in the 2015/16 investigation period (coinciding with BlueScope’s Financial Year 2016) is estimated at *[Confidential Volume Injury value]*. Please refer to Confidential Attachment 2 for details of the above calculations.

(b) Price-effect Injury

BlueScope has also quantified the price impact of the dumped and subsidised exports of galvanised steel from India, Malaysia and Vietnam. [REDACTED] [Confidential price injury effect details].

BlueScope recognises that in the 2015/16 year there were reductions in raw material input prices for coal (coking and PCI) and iron ore. [REDACTED] [Confidential raw material price considerations].

For the purposes of this analysis, BlueScope has [REDACTED] [Confidential price injury effect details].

A. FY 2015/16 Pricing [REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

B. FY 2015/16 Price Comparisons

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

C. Total Price Effect Injury

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Note: Refer Confidential Attachment 2 for workings on volume and price-effect injury estimations.

[REDACTED] [Confidential price injury effect considerations].

IV. Aggregate injury to Australian industry in 2015/16

The foregoing analysis demonstrates that BlueScope has sustained injury that can be quantified as follows:

[REDACTED]

[Redacted] [Quantified injury details].

[Redacted]
[Redacted]
[Redacted] [Confidential injury impact].

V. Injury in FY2017

[Redacted]
[Redacted]
[Redacted] [Confidential injury impact].

BlueScope urges the Commission to publish a Preliminary Affirmative Determination (“PAD”) at the earliest opportunity to limit further injury to the Australian industry from the dumped imports.

VI. Production capacity

[Redacted]
[Redacted]
[Redacted] [Confidential supply and production capacity details].

[Redacted]
[Redacted] [Confidential supply and production capacity details].

[Redacted]
[Redacted]
[Redacted] [Confidential supply and production capacity details].

VII. Conclusions

The injury experienced by BlueScope from the dumped and subsidised exports from India, Malaysia and Vietnam is ‘material’, resulting in lost profit to BlueScope in the 2015/16 investigation period of approximately [Confidential injury value]. The injurious exports have continued subsequent to the period of investigation,

with further injury experienced. This has resulted in [*Confidential subsequent period injury details*]. BlueScope requests the Commission to impose a PAD without further delay.

BlueScope has demonstrated that it can adequately supply the Australian market with locally-produced galvanised steel [*Confidential capacity details*].

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

Yours faithfully,

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

Chad Uphill
Leader – Trade Affairs