

Our reference  
AHK/AP/WUAN18226-9090549

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28 February 2013

**By email:**

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Dear Ms Reid

**Anti-dumping investigation - exports of zinc coated  
(galvanised) steel from the People's Republic of China, the  
Republic of Korea and Taiwan**

As you would be aware, we act for Chung Hung Steel Corporation in relation to this investigation.

We refer to Australian Customs Dumping Notice No. 2012/62 dated 21 December 2012. That notice sought to provide clarification regarding the goods the subject of the dumping investigation into exports of zinc coated (galvanised) steel from the People's Republic of China, the Republic of Korea and Taiwan.

The goods the subject of that investigation, as set out in BlueScope Steel's application, are:

*"flat rolled products of iron and non-alloy steel of a width less than 600mm and equal to or greater than 600mm, plated or coated with zinc".*

In Australian Customs Dumping Notice No. 2012/62 it was stated that the investigation covers *"galvanised steel whether or not including any (combination of) surface treatment, for instance whether passivated or not passivated, (often referred to as chromate or unchromated), resin coated or not resin coated (often referred to as Anti Finger Print (AFP) or not AFP), oiled or not oiled, skin passed or not skin passed"*.

However, we are instructed that that clarification does not address the significant differences between hot rolled galvanised steel (HGI) and cold rolled galvanised steel (CGI).

As you would be aware the physical and mechanical properties of HGI and CGI are materially different, with the result that CGI does not meet certain Australian standards, including AS/NZS 1163, which is relied upon for the manufacture of structural pipes and

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rectangular hollow sections. This has the consequence that CGI is unsuitable for certain end-uses such as structural pipes and rectangular hollow sections.

Our client, Chung Hung Steel Corporation, understands that BlueScope Steel does not produce HGI but rather produces up to 2mm galvanised steel from cold rolled steel. That is, BlueScope Steel's manufacturing processes involves taking hot rolled steel and then cold rolling it before galvanising it to produce CGI. In short, BlueScope Steel produces only CGI and not HGI.

For end-use products requiring galvanised steel in excess of 2mm (i.e. applications requiring a wall thickness of 3mm or greater), such products can be produced only from HGI in order to meet Australian standards (e.g. AS/NZS 1163:2009). As HGI is not available locally, it must be imported into Australia. In this regard we note that BlueScope Steel's sheet and coil product guide, a copy of which is available on its website, identifies the Australian and New Zealand standards which its products comply with, but AS/NZS 1163:2009 is not one of them.

Further, CGI involves an additional process in the manufacture of galvanised steel, which not only adds significantly to the cost of CGI but also is an unnecessary process for galvanised steel used in the production of structural pipes and hollow structural sections. Accordingly, in addition to CGI being unsuitable for use for the manufacture of structural pipes and rectangular hollow sections because of its physical and mechanical characteristics, it also is more expensive than HGI and, as a result, it is not competitive with HGI for these end-uses.

It follows, in our client's submission, that CGI produced in Australia is not a 'like good' to imported HGI, because it has materially different mechanical and physical properties resulting in CGI not meeting certain Australian standards (e.g. AS/NZS 1163:2009) and not being suitable for certain end-uses. It also follows that imported HGI could not cause injury to BlueScope Steel as BlueScope Steel does not supply galvanised steel with a thickness greater than 2mm.

Accordingly, in our client's submission HGI should be excluded from this investigation as there is no Australian industry producing a "like good". Alternatively, if that submission is not accepted and if anti-dumping measures are ultimately imposed on imports of galvanised steel, then HGI should be excluded from such measures under sub-sections 8(7) and 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975*.

If you have any queries or require further information, please let us know.

Yours faithfully

**Corrs Chambers Westgarth**

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Partner



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