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Ms Joanne Reid
Director, Operations 3
International Trade Remedies Branch
Australian Customs and Border Protection Service
Customs House
5 Constitution Avenue
CANBERRA ACT 2601

Dear Ms Reid

Public File

Aluminium Zinc coated steel and Galvanized Steel exported from China, Korea and Taiwan – BlueScope comments re submission on behalf of Chung Hung Steel Corporation

Chung Hung Steel Corporation's Comments re Hot Rolled Galvanized Steel

I refer to the submission of 28 February 2013 on behalf of Chung Hung Steel Corporation ("CHSC") in relation to goods the subject of BlueScope Steel Limited's ("BlueScope") application for anti-dumping measures on galvanized steel exported from the People's Republic of China, Korea and Taiwan.

The submission on behalf of CHSC referenced the goods the subject of BlueScope's application, namely:

"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."

ACDN No. 2012/62 was also referenced which clarified the goods the subject of the application:

"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".

It is further stated on behalf of CHSC that the 'clarification' did not address "*the significant differences between hot rolled galvanised steel (HGI) and cold rolled galvanised steel (CGI)*".

The submission states that it is CHSC's view that "*BlueScope Steel does not produce HGI but rather produces up to 2mm galvanised steel from cold rolled steel*". CHSC also asserts that "*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*".

It is CHSC's view that as HGI is not available locally, it must be imported into Australia and that *HGI should be excluded from this investigation as there is no Australian industry producing a "like good"*.

BlueScope's comments:

BlueScope is a manufacturer of HGI exceeding 2mm thickness. BlueScope can and does produce galvanized steel up to 3.5mm in thickness for the Australian market (including for the pipe and tube market). During the investigation period, BlueScope sold in excess of 2,000 tonnes of galvanized steel with a thickness greater than or equal to 2.0mm into the pipe and tube market.

BlueScope has the capability to produce both cold rolled galvanized steel as well as hot rolled galvanised steel.

The claimed AS/NZS 1163:2009 reflects a hot rolled steel feed for the pipe and tube industry – a product that BlueScope can produce and supply to the pipe and tube industry in Australia.

CHSC's claim that hot rolled galvanised steel is not available from local manufacture in Australia is therefore incorrect.

Finally, BlueScope would highlight that CHSC's comment that the additional cost to make cold rolled galvanized steel (over hot rolled galvanized steel) is not of itself a basis for exemption or that it is not a like good. BlueScope can provide Customs and Border protection with the physical and mechanical properties of HGI and CGI that demonstrate the goods are not materially different, if requested.

If you have any questions concerning this letter, please do not hesitate to contact me on (02) 4275 3858.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Alan Gibbs".

Alan Gibbs
Development Manager – International Trade