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**Public File**

**Investigation No. 658 – Hot Rolled Coil Steel (HRC) exported from China**

BlueScope Steel Limited (BSL) refers to the following submissions seeking exemption and/or consideration for separate assessment for certain HRC products in relation to the above-noted inquiry:

<b>Interested Party</b>	<b>HRC exemption request details</b>
Bisalloy Steels Pty Ltd <sup>1</sup>	<p>The exemption goods have been described as follows:</p> <p>High strength hot rolled coil steel, in sheet form, alloyed, complying with standard GB/T 1591-2008, grade Q690MD, having all of the following:</p> <ol style="list-style-type: none"> <li>1. minimum yield strength of 690 megapascals (MPa);</li> <li>2. thickness of not less than 3mm and not greater than 4mm;</li> <li>3. width of not less than 1,000mm and not greater than 1,830mm;</li> <li>4. length of not less than 6,000mm and not greater than 10,000mm;</li> <li>5. chemical composition, by weight, of all of the following:               <ul style="list-style-type: none"> <li>– carbon content of not greater than 0.12%;</li> <li>– silicon content of not greater than 0.40%;</li> <li>– manganese content of not greater than 2.0%;</li> <li>– phosphorus content of not greater than 0.025%;</li> <li>– sulphur content of not greater than 0.010%;</li> <li>– aluminium content of not greater than 0.015%;</li> <li>– niobium content of not greater than 0.11%;</li> <li>– titanium content of not greater than 0.20%; and</li> <li>– vanadium content of not greater than 0.12%.</li> </ul> </li> </ol>
Phoenix Metal Group <sup>2</sup>	<p>An exemption has been sought for the following goods:</p> <p>HRC in the following thickness/coil mass (width/s not specified):</p> <ul style="list-style-type: none"> <li>– Thickness: Minimum 3.20 mm (tolerance of +0.05 / -0.00); and</li> <li>– Coil mass: Max 2.0 tonnes (equipment) / 2.5 tonnes (lifting).</li> </ul>
Duraquip <sup>3</sup>	<p>An exemption has been sought for the following goods:</p> <ul style="list-style-type: none"> <li>– Decoiled steel plate in 3mm and 4mm thickness, 1,800 mm wide, lengths of approximately 11,990 mm, produced from coil.</li> </ul>

<sup>1</sup> EPR folio no. 29.

<sup>2</sup> EPR folio no. 31.

<sup>3</sup> EPR folio no. 32.

Baosteel <sup>4</sup>	<p>An exemption has been sought for the following goods:</p> <ol style="list-style-type: none"> <li>1. Low carbon emission HRC (Green Steel - BeyondECO Brand);</li> <li>2. HRC in widths and thicknesses outside the scope of local production capabilities; and</li> <li>3. High tensile grade hot rolled micro-alloyed non-heat treated steel sheet (grades BS700MCK2 and BS700MCK4). These exemption goods have been described as follows: <ul style="list-style-type: none"> <li>Steel, hot rolled micro alloyed non-heat treated steel sheet: <ul style="list-style-type: none"> <li>– conforming to steel grades BS700MCK2 and BS700MCK4;</li> <li>– with a yield strength NOT less than 680 Mpa;</li> <li>– of a thickness NOT less than 2.5mm and NOT greater than 16mm; and</li> <li>– a Carbon Equivalent Value (CEQ) of less than or equal to 0.50.</li> </ul> </li> </ul> </li> </ol>
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For the administrative record, and to ensure the streamlined implementation of interim dumping and countervailing measures, BSL confirms that it does not oppose exemptions being granted for the following goods as requested by the following interested parties:

1. Bisalloy Steels Pty Ltd: BSL does not oppose exempting the proposed exemption goods as described above; and
2. Baosteel: BSL does not oppose exempting the proposed high-tensile exemption goods, as described above and as follows:

*Steel, Hot Rolled micro alloyed non-heat treated steel sheet:*

- conforming to steel grades BS700MCK2 and BS700MCK4;
- with a yield strength NOT less than 680 Mpa;
- of a thickness NOT less than 2.5 mm and NOT greater than 16mm; and
- a Carbon Equivalent Value (CEQ) of less than or equal to 0.50.

In relation to all other exemption requests and/or consideration for separate assessment, BSL does oppose the granting of exemptions/separate assessment over the goods as-described on the basis that BSL does produce like or directly competitive goods for sale in Australia to all purchasers on equal terms under like conditions, having regard to the custom and usage of trade, and/or that suitably equivalent goods are produced/manufactured in Australia.

To evidence this, BSL provides the following for the Commission's assessment:

- in relation to the goods as described by Phoenix Metal Group, BSL provides at Confidential Attachment 1 details of its capability to supply HRC for the requisite thickness points and coil mass that the interested party has sought exemption/separate assessment over.
- in relation to the goods as described by Duraquip, BSL provides at Confidential Attachment 1 details of its capability to supply HRC in sheeted form in thicknesses of 3mm and 4mm, and at widths that are substitutable for 1,800mm.
- in relation to the goods as described by Baosteel:
  - for exemption #1 in the above table: BSL considers its locally produced HRC alike and directly competitive to Baosteel's low carbon emission HRC on the basis that embedded carbon content does not impact the end-use of the product. BSL provides at Confidential Attachment 3 an internal BSL assessment of the low carbon emission HRC. This assessment concludes that the emissions generated when producing the goods do not

<sup>4</sup> EPR folio no. 36. The collective entities making the exemption request are Baoshan Iron & Steel Co Ltd (Baoshan), Baosteel Zhanjiang Iron & Steel Co Ltd (Zhanjiang), and Shanghai Meishan Iron & Steel Co Ltd (Meishan).

impact the end use of the product. The attachment does not contain further information. Moreover, BSL's HRC is offered for sale in Australia to all purchasers on equal terms under like conditions, having regard to the custom and usage of trade, in the same way as Baosteel's low carbon HRC is and would be. In any case, the exporter has not provided sufficient and specific detail on the types of HRC the exemption is being sought for; and

- for exemption #2 in the above table: BSL provides at Confidential Attachment 2 details of sales invoices of HRC goods, during the investigation period for the requisite thicknesses that the interested party has sought exemption over. Confidential Attachment 1 further details the widths of BSL-produced HRC that are substitutable.

For and on behalf of BlueScope Steel Limited.