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Public File

Corporate Restructure No. 001 – Zinc coated (galvanised) steel from Vietnam

I. Introduction

BlueScope Steel Limited (**BlueScope**) makes this submission in response to Corporate Restructure inquiry 001, initiated based on an application by China Steel and Nippon Steel Vietnam Joint Stock Company (**CSVC** and/or **the Applicant**), lodged with the Anti-Dumping Commission (**the Commission**) on 29 January 2026.

CSVC seeks to affect an official change in its registered company name from *China Steel Sumikin Vietnam Joint Stock Company* to *China Steel and Nippon Steel Vietnam Joint Stock Company*. CSVC states the name change took effect from 14 August 2019 and that no other change to its corporate structure, management, production facilities, customer base or distribution arrangements has occurred.¹

BlueScope does not oppose the application in principle but submits that the Commission should conduct an assessment of it. BlueScope raises two matters that require consideration:

1. whether exports of the goods to Australia in the period between the name change (August 2019) and the date of this application (January 2026) were invoiced, declared or entered under the new name or any other name; and
2. the unexplained delay of approximately six and a half years between the name change and the lodgement of this application.

II. Background – the goods and the measures

The goods relevant to this application are flat rolled products of iron and non-alloy steel, plated or coated with zinc, of any width (**the goods**). The goods are subject to the anti-dumping measures arising from Investigation No. 370 (**INV 370**) into exports from Vietnam, India and Malaysia.

Following INV 370, CSVC was listed in the DCR as *China Steel Sumikin Vietnam Joint Stock Company*. The DCR records Dumping Specification Number (DSN) 125 for CSVC's exports, with the current measures expressed as a floor price on a FOB, cash basis.²

¹ CSVC application, p. 10.

² Refer <https://www.industry.gov.au/sites/default/files/adc/measures/2026-02/dcr--zinc-coated-galvanised-steel.pdf>

Following 5-year imposition, the measures were the subject of Continuation Inquiry No. 592 (**CON 592**). CON 592 covered the period 1 October 2020 to 30 September 2021 and was finalised in July 2022. In REP 592, CSVG was the only Vietnamese exporter to provide a questionnaire response in that inquiry³, and its cooperation formed a central part of the Commission's assessment of the Vietnamese component of the continuation inquiry.⁴

While BlueScope notes that the Applicant's responses to questions 16 through 25 of the application form are broadly consistent in affirming that nothing has changed, the Commission should not rely exclusively on the Applicant's self-reporting. Independent verification steps, such as reviewing export documentation, Australian Border Force (**ABF**) entries, bills of lading etc for the period following August 2019, would be appropriate.⁵

III. Correct application of measures

The question arising from this application is under what name did the Applicant export goods to Australia in the period from 14 August 2019 (the date of the name change) to the date of this application (29 January 2026). This period spans more than six years and, in the case of CON 592, encompasses the entire inquiry period and post-inquiry review period.

BlueScope submits that the following scenarios should be considered by the Commission:

- If Australian exports from August 2019 onward were invoiced and declared under the new name (not listed in the DCR at that time) there is a risk that such exports were not assessed against DSN 125, or that importers did not apply the correct duty rate. The Commission should verify with the ABF whether any entries were made under the new name and, if so, whether the correct measures were applied.
- If exports continued to be declared under the old name, questions arise as to the accuracy of those declarations. The Commission should satisfy itself that this practice did not mask any underlying change in the exporting entity.
- The Commission should also consider whether any exports were made by the Applicant under any third name or related entity name during the period, which may have resulted in those exports being treated as *other* and assessed at the residual rate under DSN 126 rather than DSN 125.

In any of these instances, the Commission should consider whether the DCR update sought in this inquiry be accompanied by a referral to the ABF to review the duty treatment of affected entries.

IV. Delay in application lodgement

The Applicant's name change occurred on 14 August 2019.⁶ The corporate restructure application was not lodged until 29 January 2026. The Applicant offers no explanation for the delay in requesting the name change of approximately six years and five months.

The inquiry period for CON 592 spanned 1 October 2020 to 30 September 2021, well after the name change. The Applicant participated in that continuation inquiry as the only Vietnamese exporter to provide a questionnaire response.⁷ At no point during CON 592 did the Applicant bring its changed name to the Commission's attention or request that the DCR be updated.

BlueScope therefore submits that the Commission should require the Applicant to provide an explanation of why the application was not made promptly after the name change in August 2019, and why the name change was not disclosed during the CON 592 process.

³ REP 592, p. 9.

⁴ India and Malaysia were the other subject countries.

⁵ This would include examining what name appeared on commercial invoices, bills of lading and certificates of origin for Australian sales during the relevant period.

⁶ CSVG application, p. 10.

⁷ REP 592, p. 9.

For and on behalf of BlueScope.