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The Director - Investigations
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

**Hot Rolled Coil Steel Exported from the People's Republic of China
Exemption request**

Dear Director,

We act on behalf of Baoshan Iron & Steel Co Ltd (Baoshan), Baosteel Zhanjiang Iron & Steel Co Ltd (Zhanjiang), and Shanghai Meishan Iron & Steel Co Ltd (Meishan) (collectively referred to herein as "Baosteel").

Baosteel presents this submission for exemption from interim dumping duties and interim countervailing duties, in relation to certain hot rolled coil steel ("HRC") products exported from China, as proposed in the Statement of Essential Facts 658 (SEF). This submission is made pursuant to Section 8(7) of the *Customs Tariff (Anti-Dumping) Act 1975* ("Dumping Duty Act") for dumping duties and Section 10(8) of the same Act for countervailing duties.

Baosteel respectfully requests that the Minister exempt the specified goods from the proposed duties on the grounds that like or directly competitive goods are not offered 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 produced or manufactured in Australia are not reasonably available. These grounds align with the criteria outlined in Sections 8(7) and 10(8) of the Dumping Duty Act.

Baosteel seeks exemptions for the following HRC products:

1. Low carbon emission HRC (Green Steel - BeyondECO Brand)

These are hot rolled coils and sheets with a 30%-60% reduction in carbon emissions compared to conventional steel production. Branded as "BeyondECO," these products are environmentally friendly and designed to support sustainable supply chains. They are available in various forms suitable for construction and infrastructure applications.

- **Green Steel**

Low carbon emission products, own brand **BeyondECO**

BeyondECO -30% Hot rolled steel coils and sheets

BeyondECO -60% will also be available by end of 2025.



Baosteel's low carbon emission HRC represents a cutting-edge advancement in sustainable steel production. These products achieve significant carbon reductions through innovative processes, including optimised raw material use and energy-efficient manufacturing. To date, no local Australian supplier, including BlueScope Steel, offers equivalent low-carbon HRC with comparable emission reductions (30%-60%).

While BlueScope Steel has made progress in reducing its overall emissions intensity by approximately 14% since FY2018 through operational efficiencies and projects like the NeoSmelt initiative, it does not currently produce or supply hot rolled coil products with the same level of carbon emission reductions as Baosteel's BeyondECO brand.

Australian industries, particularly in construction and infrastructure sectors, rely on imports for such environmentally advanced materials. These products are critical to assisting Australia in building up a low-carbon emission supply chain in the future, enabling downstream industries to meet national net-zero ambitions and reduce embodied carbon in buildings and infrastructure.

Imposing duties would hinder Australia's ability to build a low-carbon supply chain, contradicting national goals for emissions reduction and sustainable development.

Downstream users, such as builders and manufacturers, would face increased costs without viable local alternatives, potentially delaying projects and increasing overall environmental impact through reliance on higher-emission substitutes.

Documentation on carbon reduction methodologies can be provided upon request, including third-party certifications to ensure compliance with the proposed exemption.

2. HRC in widths and thicknesses outside the scope of local production capabilities

Baosteel manufactures and supplies HRC in dimensions that exceed the capabilities of local production. Specifically, for hot rolled coils and sheets the table below identifies the widths and thickness unable to be currently manufactured by BlueScope Steel, and therefore are not offered for sale in Australia:

Supplier	Baosteel		BlueScope		Exemption application	
Product	T (mm)	W (mm)	T (mm)	W (mm)	T (mm)	W (mm)
HR Coil	1.5-4.75	/	3-4.75	/	1.5-2.95	/
HR Sheet	1.5-4.75	/	3-4.75	/	1.5-2.95	/
HR Coil	/	800-2000	/	up to 1550	/	1580-2000
HR Sheet	/	800-2000	/	up to 1550	/	1580-2000

- thicknesses ranging from 1.5 mm to 2.95 mm (where local production starts at 3 mm);
- widths ranging from 1580 mm to 2000 mm (where local production is limited to up to 1550 mm).

These specifications are critical for applications requiring thinner or wider materials, such as specialised construction, and manufacturing processes that demand precise dimensional tolerances. According to BlueScope's product datasheets and capabilities, equivalent products are not reasonably available locally without custom orders, which are not cost-effective or timely. Imposing duties on these would restrict access to essential materials, impacting downstream industries and innovation in Australia.

3. High tensile grade hot rolled micro-alloyed non-heat treated steel sheet (grades BS700MCK2 and BS700MCK4)

The product we are referring to is high tensile steel with the following characteristics:

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, and**
- **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.**

Refer to non-confidential attachment A for a copy of Baosteel's High Tensile Product Data Sheet. These products are tailored for demanding applications, such as truck manufacturing, where high strength and durability are essential.

It is important to note that the 700-grade product described above was the subject of a previous exemption inquiry¹. Following the Commission's inquiries, it found:

Based on the application, information provided by BlueScope Steel Limited ('BlueScope'), the only Australian producer of certain hot rolled plate steel (plate steel), and BlueScope's website, the Commission has found that there is no Australian industry producing like or directly competitive goods offered for sale in Australia to all purchasers on equal terms under like conditions having regard to the custom and usage of trade.

Importantly, BlueScope itself confirmed that:

- does not oppose the request for exemption;
- does not produce goods that are identical in all respect to the goods described in the application;
- does not produce and sell goods that are like or directly competitive to the exemption goods; and
- is not capable of producing goods that are like or directly competitive to the exemption goods.

¹ [Exemption inquiry EX0050 - High tensile 700 grade steel](#)

Since the Commission's decision to exempt the specific 700-grade steel sheet from measures, there has been no change to the availability or capability of Bluescope to produce like or directly competitive goods.

Therefore, should the Commission ultimately recommend that the Minister publish a dumping and/or countervailing duty notices, Baosteel requests that the Commission recommend that high tensile 700-grade steel sheet as described in this submission, be exempted from the notices.

4. Conclusion and request

Baosteel respectfully requests that the Minister exercise the exemption powers under Sections 8(7) and 10(8) of the Dumping Duty Act to exclude the specified HRC products from any imposed interim duties. This would ensure continued access to innovative, sustainable, and specialised steel products that are not reasonably available in Australia, benefiting the economy, environment, and end-users.

We appreciate the Commission's consideration of this submission and are available for any further discussions or clarifications.