



J.B. BRACIC & ASSOCIATES
TRADE REMEDY ADVISORS

PO Box 3749
Manuka, ACT 2603
Mobile: +61 499 056 729
Email: john@jbracic.com.au
Web: www.jbracic.com.au

3 August 2026

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



**Certain flat rolled steel products (steel plate) exported from
the People's Republic of China**

Exemption request – high tensile 700-grade steel (grades BS700MCK2 and BS700MCK4)

Dear Director,

We act for Baoshan Iron & Steel Co Ltd (Baoshan) and Baosteel Zhanjiang Iron & Steel Co Ltd (Zhanjiang), collectively Baosteel throughout this submission.

Baosteel respectfully requests that, should the Commissioner ultimately recommend that the Minister publish a dumping duty notice and/or a countervailing duty notice in respect of the goods under consideration, the Commissioner also recommend that the Minister exempt high tensile 700-grade steel of grades BS700MCK2 and BS700MCK4, as described below (the exemption goods), from any such notices, pursuant to section 8(7) of the *Customs Tariff (Anti-Dumping) Act 1975* (the Dumping Duty Act) in respect of dumping duties and section 10(8) of the same Act in respect of countervailing duties.

The exemption request raises no new questions. The identical goods, produced by the same Baosteel entities, have twice been considered under the exemption criteria and twice found to satisfy them. First in exemption inquiry EX0050 in respect of the measures applying to certain hot rolled plate steel,¹ and most recently in Anti-Dumping Commission Report No 658, on which the Minister acted by making Ministerial Exemption Instrument No 1 of 2026, exempting the goods from the dumping and countervailing duties applying to certain hot rolled coil steel from China with effect from 19 January 2026.² The sole Australian producer of flat rolled steel products, BlueScope Steel Limited, has itself confirmed on the Commission's record that it does not produce, does not sell, and is not capable of producing, goods that are like or directly competitive with the exemption goods. Nothing in the present investigation alters that position, and consistency of administration requires the same outcome here.

The exemption goods

The exemption goods are high tensile hot rolled micro-alloyed non-heat treated steel sheet with the following characteristics:

¹Exemption inquiry EX0050 – High tensile 700 grade steel (exemption from the measures applying to certain hot rolled plate steel).

²Ministerial Exemption Instrument No 1 of 2026, made under sections 8(7)(a) and 10(8)(a) of the Customs Tariff (Anti-Dumping) Act 1975, signed by the Hon Tim Ayres, Minister for Industry and Innovation and Minister for Science, on 4 May 2026, following consideration of Anti-Dumping Commission Report No 658.

conforming to steel grades BS700MCK2 and BS700MCK4, complying with standard Q/BQB 316-2018 or later versions; with a yield strength not less than 680 MPa; of a thickness not less than 2.5 mm and not greater than 16 mm; and with a Carbon Equivalent Value (CEQ) of less than or equal to 0.50.

A copy of Baosteel's High Tensile Product Data Sheet has previously been placed on the Commission's public record and can be re-supplied on request.³

These products are engineered for demanding applications in which very high strength, formability and durability must be achieved simultaneously at reduced section weights, most notably truck, trailer and tipper body manufacturing, crane and concrete-pump boom structures and similar transport and lifting equipment. The 680 MPa minimum yield strength distinguishes the exemption goods sharply from the general construction and manufacturing grades that constitute the goods under consideration in this investigation. To the extent the exemption goods are supplied in flat (sheet) form, not in coils, at thicknesses of 4.75 mm or greater and widths of 600 mm or greater, they fall within the goods description in this investigation and would, absent an exemption, be captured by any measures imposed.

The exemption criteria are satisfied for these goods

Exemption inquiry EX0050 – plate steel measures

The 700-grade product described above was the subject of exemption inquiry EX0050, concerning the measures applying to certain hot rolled plate steel – goods of the same physical family (flat rolled products, not in coils) as the goods under consideration in this investigation. Following its inquiries, the Commission found:⁴

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.

Of particular significance, BlueScope itself confirmed in that inquiry that:

- it does not oppose the request for exemption; that it does not produce goods that are identical in all respects to the goods described in the application;
- that it does not produce and sell goods that are like or directly competitive to the exemption goods; and
- that it is not capable of producing goods that are like or directly competitive to the exemption goods.⁵

Those confirmations were made by the same company that is the applicant and sole member of the Australian industry in the present investigation, in respect of the same exemption goods.

Report No 658 and Ministerial Exemption Instrument No 1 of 2026

The exemption goods were again considered in Investigation 658 concerning hot rolled coil steel exported from China, in which Baosteel applied on 19 January 2026 for their exemption from the

³Baosteel's High Tensile Product Data Sheet was provided as non-confidential Attachment A to the application for exemption of 19 January 2026, EPR 658 document no. 36, and can be re-supplied in this investigation on request.

⁴Exemption inquiry EX0050 – High tensile 700 grade steel.

⁵Baosteel, Application for exemption, 19 January 2026, EPR 658 document no. 36.

proposed measures.⁶ The Commissioner recommended the exemption in Report No 658, and the Minister accepted that recommendation. By Ministerial Exemption Instrument No 1 of 2026, signed on 4 May 2026, the Minister exempted from interim dumping duty and dumping duty, and from interim countervailing duty and countervailing duty, the goods described in Attachment 2 to the instrument, namely:⁷

*Hot rolled coil steel, in sheet or coil form, that conforms to all of the following: Steel grade BS700MCK2 or BS700MCK4, complying with standard Q/BQB 316-2018 or later versions; Minimum yield strength at or above 680 MPa.*⁸

In making the instrument, the Minister recorded that he was “satisfied 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”. The instrument took effect from 19 January 2026, the date of application, and remains in force.

Australian industry capability

Since the Commission’s findings in EX0050 and Report No 658, and the Minister’s acceptance of those findings in May 2026, there has been no change in the availability or capability of BlueScope, or of any other Australian producer, to produce goods that are like or directly competitive with the exemption goods. BlueScope’s hot rolled flat product range does not extend to micro-alloyed non-heat treated product at a minimum yield strength of 680 MPa, whether in coil, sheet or plate form, and BlueScope has not contended otherwise in any of the proceedings referred to above. It follows 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 that suitably equivalent Australian-produced goods are not reasonably available. Both limbs of the exemption criteria in sections 8(7) and 10(8) are satisfied.

Proposed exemption description

To ensure consistency with the description already settled by the Minister in Ministerial Exemption Instrument No 1 of 2026, and its administrability at the border, Baosteel proposes that any exemption in this investigation be expressed in terms to the following effect:

Flat rolled steel products otherwise the subject of the measures, in sheet or plate form, that conform to all of the following: steel grade BS700MCK2 or BS700MCK4, complying with standard Q/BQB 316-2018 or later versions; minimum yield strength at or above 680 MPa.

This description adopts verbatim the objective criteria of Attachment 2 to Ministerial Exemption Instrument No 1 of 2026, adapted only to the form of the goods under consideration in this investigation. Baosteel would welcome the opportunity to refine the precise wording in consultation with the Commission.

⁶Baosteel, Application for exemption, 19 January 2026, EPR 658 document no. 36.

⁷Ministerial Exemption Instrument No 1 of 2026, signed 4 May 2026.

⁸Ministerial Exemption Instrument No 1 of 2026, Attachment 2. The instrument took effect in respect of the Attachment 2 goods from 19 January 2026, being the date the application for exemption was made.