

31 July 2026

The Director
 Investigations 1
 Anti-Dumping Commission

BY EMAIL: investigations1@adcommission.gov.au

Dear Director,

Investigation No. 705 – Steel Flat Bar from Taiwan

PROPOSAL TO MODIFY THE PROPOSED MCC STRUCTURE

Infrabuild NSW Pty Ltd (**InfraBuild**) proposes that an amendment be made to the Model Control Code (**MCC**) structure relating to this investigation. InfraBuild also takes the opportunity to provide a table showing the appropriate categorisation of steel grades of flat bar produced by Taiwanese exporter Feng Hsin Steel Co., Ltd (**Feng Hsin**) to the MCC category of 'Grade' for this investigation. Grades are differentiated by the mechanical property of **minimum** yield strength which is specified for each grade contained in the relevant Standard. This table may assist exporters in mapping their sales to the MCC 'Grade' category when completing their response to exporter questionnaire.

1. Amendment to current MCC Matrix

The Commission's proposed MCC structure for this investigation as published in ADN No. 2026/096 appears as follows:

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
1	QUALITY	Prime	P	Mandatory	Optional
		Non-prime	N		
2	GRADE <u>Minimum yield strength</u> up to a thickness of 40mm as specified by the Standard the product is certified to be produced to. Measured in Megapascals (MPa or N/mm ²)	Less than 270MPa	250	Mandatory	Optional
		Equal to or greater than 270MPa and less than or equal to 330MPa	300		
		Greater than 330MPa and less than or equal to 380MPa	350		
		Greater than 380MPa	400		
3	WIDTH (mm)	Greater than 17mm and less than 38mm	S	Mandatory	Optional
		Equal to or greater than 38mm and less than or equal to 150mm	L		

Proposed new MCC Matrix

InfraBuild proposes removing the reference, 'up to a thickness of 40mm' from the description within the '**GRADE**' category (Item 2) and making a minor adjustment to the upper and lower limits respectively for sub-categories of Grades '300' and '350'. These changes are reflected in the proposed new MCC structure:

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
1	QUALITY	Prime	P	Mandatory	Optional
		Non-prime	N		
2	GRADE <u>Minimum yield strength as specified by the Standard</u> the product is certified to be produced to. Measured in Megapascals (MPa or N/mm ²)	Less than 270MPa	250	Mandatory	Optional
		Equal to or greater than 270MPa and less than 330MPa	300		
		Greater than or equal to 330MPa and less than or equal to 380MPa	350		
		Greater than 380MPa	400		
3	WIDTH (mm)	Greater than 17mm and less than 38mm	S	Mandatory	Optional
		Equal to or greater than 38mm and less than or equal to 150mm	L		

The reason for proposing these amendments is **to better align to the Australia/New Zealand Standard, namely AS/NZS 3679.1 to which flat bar is produced for the Australian market. The Standard specifies the minimum yield strength for each Grade based on thickness and we note that no upper limit for thickness has been specified in the goods description.**

For flat bar produced to meet the requirements of the Australian/New Zealand Standard AS/NZS 3679.1, the minimum yield strength requirement, by thickness, is provided in the confidential extract below.

[CONFIDENTIAL – SUBJECT TO COPYRIGHT]

Extract of

TABLE 14
TENSILE TEST REQUIREMENTS FOR FLATS AND SECTIONS

Source: Australian/New Zealand Standard AS/NZS 3679.1

2. Mapping of Taiwanese flat bar grades to MCC Grade categories

The website of Taiwanese flat bar exporter, Feng Hsin, provides a table of flat bar grades¹ produced to various domestic and international Standards and helpfully provides the minimum yield strength as part of the ‘Mechanical Requirements’. We have endorsed in “red text” the corresponding GRADE identifier within InfraBuild’s proposed MCC structure.

¹ https://www.fenghsin.com.tw/e_flatsteel.html (accessed 28 July 2026)



F L A T B A R

AVAILABLE SIZES	AVAILABLE GRADES	CHEMICAL REQUIREMENTS	MECHANICAL REQUIREMENTS	PRODUCTS USE
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Spec.	Symbol	Yield Strength (Y.S) N/mm2(ksi)		Tensile Strength (T.S) N/mm2(ksi)	Elongation (%)	Bend Test 180° Inside Radius	Impact test
		t ≤ 16	16< t ≤ 48				
CNS 2473 JIS G3101	SS330	205min	250 195min	330~430	26min[t≤5]	0.5*t OK	-
			21min[5<t≤16]				
			26min[16<t≤50]				
	SS440	245min	250 235min	400~510	21min[t≤5]	1.5*t OK	-
			17min[5<t≤16]				
			21min[16<t≤50]				
	SS490	285min	300 275min	490~610	19min[t≤5]	2.0*t OK	-
			15min[5<t≤16]				
			19min[16<t≤50]				
	SS540	400min	400 390min	540min	16min[t≤5]	2.0*t OK	-
			13min[5<t≤16]				
			17min[16<t≤50]				
ASTM A36	A36	250(36)min	250	400-550 (58-80)	20min[g.l=200mm]	-	-
ASTM A572	Grade 50 type 2	345(50)min	350	450(65)min	18min[g.l=200mm]	-	-
	Grade 65 type 2	450(65)min	400	550(80)min	15min[g.l=200mm]	-	-
ASTM A709	Grade 50 type 2	345(50)min	350	450(65)min	18min[g.l=200mm]	-	-
BS4360	GR43A	275min	265min 250	430 ~ 580	20min[g.l=200mm]	-	-
CNS 2947 JIS G3106	SM400A	245min	250 235min	400~510	23min[t≤5]	-	-
			18min[5<t≤16]				
			22min[16<t≤50]				
	SM490A	325min	300 315min	490~610	22min[t≤5]	-	-
			17min[5<t≤16]				
			21min[16<t≤50]				
CNS 13812 JIS G3136	SN400A	235~355 (Yield ratio≤80%)	250	400~510	18min[6≤t≤16]	-	Spec.
					22min[16<t≤50]		
	SN490B	325~445 (Yield ratio≤80%)	300	490~610	17min[6≤t≤16]	-	Spec.
					21min[16<t≤50]		
EN 10025-2	S235JR, S235J0, S235J2	235min	250 225min	360~510	26min(g.l=5.65√S0)	-	Spec.
	S275JR, S275J0, S275J2	275min	250 265min	410~560	23min(g.l=5.65√S0)		
	S355JR, S355J0, S355J2, S355K2	355min	350 345min	470~630	22min(g.l=5.65√S0)		
AS/NZS 3679.1	GR300	t<11	11≤t≤17	440min	22min(g.l=5.65√S0)	-	-
		320min	300min 300				
	GR350L0	t<11	11≤t≤17	480min	20min(g.l=5.65√S0)	-	-
		360min	340min 350				

InfraBuild provides the table below to show the appropriate mapping of the Feng Hsin flat bar grades to the MCC matrix category of 'GRADE' based on the minimum yield strength specified in the relevant Standards.

		GRADE	MINIMUM YIELD STRENGTH as specified by the Standard (MPa)	MCC Grade Code
GRADE <u>Minimum yield</u> <u>strength as</u> <u>specified by the</u> <u>Standard</u> the product is certified to be produced to. Measured in Megapascals (MPa or N/mm ²)	Less than 270MPa	SS330	195	250
		SS440	235	
		ASTM A36	250	
		BS4360 GR43A	265	
		SM400A	235	
		S235JR	225	
		S275JR	265	
	Equal to or greater than 270MPa and less than 330MPa	SS490	275	300
		SM490A	315	
		SN490B	325	
		AS/NZS 3679.1 Grade 300	300	
	Greater than or equal to 330MPa and less than or equal to 380MPa	ASTM A572 Grade 50	345	350
		ASTM A709 Grade 50	345	
		S355JR	345	
		AS/NZS 3679.1 Grade 350	340	
	Greater than 380MPa	SS540	390	400
		ASTM A572 Grade 65	450	

3. Conclusions

InfraBuild has proposed a minor modification to the Commission's proposed MCC structure for this investigation as published in ADN No. 2026/096 to ensure accurate alignment to the applicable Australian Standard (AS/NZS 3679.1). InfraBuild has also demonstrated that the proposed modification permits the categorisation of the publicly stated grades of flat bar produced by the Taiwanese exporter, Feng Hsin, across the proposed MCC 'GRADE' identifiers. InfraBuild's suggested mapping of Feng Hsin flat bar grades permits ease of comparison between those grades sold domestically, and those exported to Australia.

Please do not hesitate to contact your InfraBuild representative on record with any questions.

FOR AND ON BEHALF OF

InfraBuild NSW Pty Ltd