

PUBLIC RECORD VERSION

Date: 12 July 2026

To:

The Director, Investigations

Anti-Dumping Commission

GPO Box 2013

Canberra ACT 2601

Australia

Via email: investigations@adcommission.gov.au



RE: Case 706 – Investigation into Zinc Coated (Galvanised) Steel Exported from the Republic of Korea and the Socialist Republic of Vietnam

Submission by an Australian Downstream Manufacturer and Interested Party

1. Introduction

This submission is made on behalf of **Earthscope Technologies Pty Ltd** regarding the anti-dumping investigation into zinc-coated (galvanised) steel coil imported from Vietnam, specifically from Hoa Sen Group.

We are an Australian-based downstream manufacturer. We use imported galvanised steel coil to manufacture **VersaSpan™**, a high-performance structural cladding product proudly developed in Queensland by Australians. Our product directly competes in the domestic market with BlueScope Steel's *Aramax* product line.

As a local innovator and manufacturer, our business depends on competitive, physically suitable, and unbranded raw materials. We strongly oppose the imposition of anti-dumping duties on Hoa Sen coil. BlueScope Steel is leveraging its domestic monopoly to anti-competitively restrict our access to raw materials, forcing us to rely on imported alternatives to sustain Australian manufacturing jobs.

2. Failure of Domestic Industry to Supply Commercially Viable Substitutes, Coercive Tactics, and Evidence Against Dumping

The Anti-Dumping Commission must consider whether the domestic industry operates fairly and is genuinely injured by imports, or if it is abusing its dominant market position. BlueScope Steel has consistently failed to supply the market on reasonable terms, using aggressive tactics and its market power to protect its downstream *Aramax* product line.

- **Exploitative Pricing History Prior to Investigation:** Prior to initiating their anti-dumping request, BlueScope Steel used its position as the sole domestic producer to exploit downstream manufacturers. BlueScope's quoted price to our

business for domestic coil was **CONFIDENTIAL PRICE**—a price roughly **CONFIDENTIAL PERCENTAGE** higher than any other global supplier would offer. This premium was an anti-competitive penalty designed to squeeze the margins of independent local fabricators.

- **Tactical and Temporary Price Reductions:** Only after initiating this regulatory process did BlueScope lower its quote to a current price of **CONFIDENTIAL PRICE** in an attempt to simulate fair market competition. For comparison, our business secures imported Hoa Sen coil at a landed price of **CONFIDENTIAL PRICE** in Australia. While BlueScope's current pricing has temporarily dropped to align closely with standard global market rates for coil, Earthscape Technologies strongly believes this is a short-term, tactical manipulation. If anti-dumping duties are successfully implemented and foreign competition is locked out, BlueScope will almost certainly exploit its restored monopoly by immediately raising prices back to predatory levels.
- **Established Pattern of Anti-Competitive Behaviour:** The aggressive commercial tactics deployed by BlueScope in this instance are part of an established corporate pattern of anti-competitive market manipulation. The Australian Competition and Consumer Commission (ACCC) successfully prosecuted BlueScope for serious, deliberate attempts to engage in cartel conduct and price-fixing within the Australian flat steel market. The Full Federal Court upheld a record \$57.5 million penalty against BlueScope—the highest penalty ever imposed for a competition law breach in Australian history. Given this documented history of trying to artificially inflate flat steel market prices and squeeze competitors, the Commission should view BlueScope's current anti-dumping application as another attempt to distort the market using defensive trade remedies.
- **Aggressive and Unprofessional Coercion:** BlueScope representatives have engaged in aggressive and intimidating behaviour to pressure our business into abandoning our independent supply chain. In a highly unprofessional instance, a BlueScope representative used abusive language during a phone call with one of our administrative staff members, swearing at her and calling her "un-Australian" for our use of imported materials. This conduct caused severe distress, bringing the employee to tears, and demonstrates the toxic culture and anticompetitive pressure BlueScope applies to lock out competitors.
- **History of Refusal to Supply:** BlueScope Steel has previously attempted to withhold supply or outright refuse to sell domestic coil to Earthscape Technologies because our **VersaSpan™** product competes directly with *Aramax*.

- **Conditional Supply and Anti-Competitive Warranty Terms:** While BlueScope recently quoted **CONFIDENTIAL PRICE** per tonne, they explicitly refused to honour product or performance warranties on this steel unless we accept coil that features the BlueScope trademark laser-engraved continuously across the surface.
- **Physical Unsuitability of Branded Domestic Steel:** Because our **VersaSpan™** structural cladding remains highly visible from both sides upon final building installation, end consumers refuse to purchase panels covered in repeated corporate branding. By tying product warranties to mandatory visible branding, BlueScope has created an artificial technical barrier that renders their domestic supply entirely unusable for our manufacturing process.

3. Material Injury is Self-Inflicted and Not Caused by Imports

BlueScope's application alleges that imports from Hoa Sen are causing it material injury. However, any volume losses BlueScope experiences from Earthscape Technologies are entirely self-inflicted. BlueScope's own commercial strategies—specifically refusing to supply unbranded, warrantied coil to competing downstream manufacturers—force us to source unbranded galvanised coil from Hoa Sen to meet our architectural clients' structural and aesthetic requirements.

Imposing anti-dumping duties will not shift our demand back to BlueScope, as their commercial conditions make their product unmarketable for our business model. Instead, duties will artificially inflate our production costs, penalise local manufacturing, and weaken competition in the Australian building products sector.

4. Conclusion

BlueScope Steel is using trade remedies defensively to monopolise the downstream roll-forming and structural framing market. We request that the Commission investigate BlueScope's conditional supply practices and conclude that imports from Hoa Sen Group are necessary to maintain a competitive and functional manufacturing supply chain in Australia.

Yours sincerely,

Nathan Schwarz

Director

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