



CSC STEEL SDN. BHD. (199101018588)

中鋼馬來西亞有限公司

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15 September 2026

To:

Australian Anti-Dumping Commission

Department of Industry, Science and Resources

Australia

Attention: Mr Emmanuel Anagnostakis

Senior Verifier

Investigations Branch

**RE: CONTINUATION INQUIRY NO. 716 – ZINC COATED (GALVANISED) STEEL
EXPORTED FROM INDIA, MALAYSIA AND VIETNAM**

**CSC STEEL SDN BHD – DETAILED SUBMISSION REGARDING NO EXPORTS
DURING THE INQUIRY PERIOD**

Dear Mr Anagnostakis,

We refer to **Anti-Dumping Notice No. 2026/127** concerning Continuation Inquiry No. 716 – Zinc Coated (Galvanised) Steel exported from India, Malaysia and Vietnam.

We write on behalf of **CSC Steel Sdn Bhd (“CSC”)** in response to the Commission’s request for a detailed submission regarding CSC’s position that it did not export the subject goods to Australia during the inquiry period from **1 July 2025 to 30 June 2026 (“Inquiry Period”)**.

1. CSC’s No-Export Position

CSC confirms that **it did not export any subject goods to Australia during the Inquiry Period.**

Accordingly, CSC had **no export sales of the subject goods to Australia during the Inquiry Period**, and there were no Australian export transactions during this period from which a current CSC-specific Australian export price could be established.

2. Verification Undertaken by CSC

Following the Commission’s request, CSC undertook a **comprehensive review of its relevant records and systems covering the entire Inquiry Period** to verify whether any exports of the subject goods to Australia had occurred.

The review included, among others:

- **CSC’s ERP and sales records** covering the entire Inquiry Period;
- **shipping and logistics records** relating to export transactions; and
- **relevant export and shipping documentation** relating to shipments during the Inquiry Period.



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These records were reviewed to identify any transactions involving the subject goods where **Australia was the destination.**

Based on this comprehensive review, CSC found **no transactions involving the export of subject goods to Australia during the Inquiry Period.**

CSC therefore confirms, based on the internal records and verification undertaken, that **no subject goods were exported by CSC to Australia during the Inquiry Period.**

3. Consistency with the Commission's Findings

CSC notes that the Commission's Anti-Dumping Notice No. 2026/127 states that the Commission examined information from the **Australian Border Force ("ABF") import database** and found that:

"No exports from Malaysia were identified in the period."

CSC further notes that the Commission stated that the absence of exports from Malaysia provides limited evidence of ongoing distribution links with the Australian market.

CSC's independent review of its own ERP, sales, shipping, logistics and export records is **consistent with the Commission's finding that no exports from Malaysia were identified during the relevant period.**

4. CSC's Individual Circumstances

CSC respectfully submits that its **individual circumstances should be considered separately** when the Commission assesses the likelihood of continuation or recurrence of dumping in relation to CSC.

In particular:

- CSC had **no exports of the subject goods to Australia during the Inquiry Period;**
- CSC therefore had **no Australian export transactions during the Inquiry Period;**
- CSC has undertaken a comprehensive verification of its relevant records to substantiate its no-export position; and
- the Commission's own review of the ABF import database likewise identified **no exports from Malaysia during the period.**

CSC respectfully submits that these circumstances should be taken into account when assessing whether continuation of the existing measures is warranted **in relation to CSC specifically.**

CSC also notes that, in relation to Malaysia, the Commission's initiation notice states that the applicant's application relies primarily on the Commission's findings in the previous continuation inquiry, evidence of historical dumping and information concerning global steel market conditions.



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CSC respectfully submits that **historical findings should be considered together with CSC's current circumstances and the absence of exports during the Inquiry Period**, rather than being relied upon in isolation when assessing the likelihood of future dumping by CSC.

5. Request for Consideration

On the basis of the comprehensive review described above, CSC respectfully confirms that **no subject goods were exported by CSC to Australia during the Inquiry Period from 1 July 2025 to 30 June 2026.**

CSC respectfully requests that the Commission take into consideration:

- the absence of any exports by CSC to Australia during the Inquiry Period;
- the comprehensive verification undertaken by CSC;
- the Commission's own finding that no exports from Malaysia were identified during the relevant period; and
- CSC's individual circumstances when assessing the likelihood of continuation or recurrence of dumping.

In light of these circumstances, **CSC respectfully requests that the Commission consider whether the existing anti-dumping measures should cease to apply to CSC specifically**, having regard to the evidence available in this inquiry.

CSC remains committed to cooperating fully with the Commission and is willing to provide any further information or clarification that the Commission may require.

Please do not hesitate to contact us should the Commission require any further information or clarification.

Yours faithfully,

**For and on behalf of
CSC Steel Sdn Bhd**

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