

5 March 2019

FOR BOTH OFFICIAL USE AND PUBLIC RECORD

The Commissioner of the Anti-Dumping Commission
55 Collins Street
Melbourne VIC 3000

By E-mail: investigations2@adcommission.gov.au

Dear Commissioner

**Review No 499 - Hot rolled structural steel sections from Japan, Korea, Taiwan and Thailand
MCC Structure**

1. As you are aware, I am the authorised representative for Tung Ho Steel Enterprise Corporation ("THS").
2. As submitted in their Response to Exporter Questionnaire, THS propose two additional components be added to the MCC structure for fair comparison as follows: -

a. MCC Category - Form

<i>Identifier</i>	<i>Sub-category</i>
1	<i>Narrow Flange Universal Beam (Width < 230 mm)</i>
2	<i>Wide Flange Universal Beam (Width ≥ 230 mm)</i>
3	<i>Narrow Flange Universal Column (Width < 360 mm)</i>
4	<i>Wide Flange Universal Columns (Width ≥ 360 mm)</i>
5	<i>Standard Channel</i>
6	<i>Heavy Channel</i>
7	<i>Tapered Flange Beam</i>
8	<i>Running Rail</i>



b. MCC Category - Steel Grade

<i>Identifier</i>	<i>Sub-category</i>
2	<i>Carbon steel for general structure (SS400, A36, A709G36, 3679G300, G300S0, S235JR, S275JR, S275J0, ABSGA)</i>
4	<i>Carbon steel for welded structure (SM400A, SM400B)</i>
5	<i>Alloy steel for welded structure (SM490A, SM490B, SM490BD, SM490BM, SM490YA, A572Gr50, A572G50A, A572G50B, A992, A992M, A709G50, G350L0, S355JR, S355J0, S355J2, S450J0, BVAH32)</i>
6	<i>Carbon steel for building structure (SN400A, SN400B, SN400BF)</i>
7	<i>Alloy steel for building structure (SN490B, SN490BD, SN490C)</i>

3. The above are proposed as follows: -


a. Form

- i. THS manufacture a wide range of sizes other than those being typical under AS/NZS 3679.1;
- ii. AS/NZS 3679.1 are all narrow flange (i.e. flange for Australian universal beams is less than 229 mm, however THS can produce for other standards up to 300mm or more. The same applies for universal columns);
- iii. Heavy channels are generally specifically designed for purpose and not exported to Australia;
- iv. Tapered flange beams are not exported to Australia, only parallel channels; and



- v. Running rail is for Taiwanese Metro system, similar to the applicant's production of rail for Australian content required rail projects, together with not being part of the goods under consideration.
- b. Steel Grade**
- i. AS/NZS 3679.1 Grade 300, which is ordered for Australia market is produced from the same semi-finished goods under steel grade 2; however, if
 - ii. Goods are required of different steel grade for the Australian market, they will be manufactured from the appropriate semi-finished goods and have an MCC accordingly.
4. The above are necessary, on the following basis: -
- a. To align the MCC with THS's internal product codes;
 - b. The addition of these categories is consistent with original investigation, past duty assessments and review of anti-dumping measures; and
 - c. Correctly compare goods manufactured from the same semi-finished goods to exceed minimum specified requirements of like goods of a similar standard.
5. The above have been verified by the Commission's verification teams in the original investigation and subsequent review of measures inquiry, together with subject of numerous submissions to counter opportunistic attempts by the applicant to have higher value/cost goods compared to goods exported to Australia.
6. THS request the Commission apply policy and practice as per Anti-Dumping Notice No 2018/77.
7. Should you require any additional information, please advise.
8. This submission is non-confidential and can be placed on the public record.

Yours faithfully



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