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**Director  
Anti-Dumping Commission  
Investigations 1  
55 Collins Street  
Melbourne  
Victoria 3000**

**By email**

Dear Director

**KG Dongbu Steel Co., Ltd  
Zinc coated (galvanised) steel review inquiry – change of company  
name**

As you know we represent Dongbu Steel Co., Ltd, now KG Dongbu Steel Co., Ltd (“Dongbu Steel”) in this review inquiry (“Review 521”).

We refer to the submission made by BlueScope Steel Limited (“BlueScope”) dated 11 June 2020. In that submission, BlueScope recommends that Dongbu Steel be treated as a different exporter by virtue of the change in its corporate name.

The basis for this request is unclear. It is not supported by any legal analysis to suggest it would be legally permissible, let alone any reasoning as to why it would be appropriate. We note that this is not an unusual circumstance, there have been a number of instances where an exporter subject to anti-dumping measures has changed its name. Unsurprisingly, in these instances, the measures applicable to that exporter have continued to apply after the name change. BlueScope offers no reasoning as to why this general practice should be departed from.

For the sake of clarity, Dongbu Steel remains the same legal entity in relation to whom the measures were originally imposed and the same legal entity that exported the goods to Australia during the period of investigation. A change in name does not alter this. Although it is unnecessary, we attach Dongbu’s business registration certificate prior to the change of name, in addition to the current business registration certificate which has already been provided to the Commission **[CONFIDENTIAL ATTACHMENTS]**. As can be seen:

**[CONFIDENTIAL TEXT DELETED – legal company identifiers remain the same despite name change]**

Further, Dongbu Steel confirms that the name change has not led to any changes of to Dongbu Steel’s operations. The relationships with customers and suppliers are essentially the same following the name change, the major suppliers of raw materials are identical and there has been no significant change to Dongbu Steel’s customer base or sales processes. Indeed, when the Commission verified Dongbu

Steel in November of 2019, the underlying transaction which led to the change of name had already been completed.

Dongbu Steel is not a “new exporter”. It is the same exporter that was verified by the Commission in November 2019, and that has cooperated with the Commission in Investigation 190, Review 273, Review, 386, Review 457 and Continuation Inquiry 449. A change of name does not alter this. BlueScope’s submission must be rejected.

Yours sincerely



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