



Application for a
review of
anti-dumping measures applying to
Aluminium Zinc Coated Steel
Exported from the People's Republic
of China

APPLICATION UNDER SECTION 269ZA OF THE CUSTOMS ACT 1901 FOR A REVIEW OF ANTI-DUMPING MEASURES

In accordance with section 269ZA of the *Customs Act 1901* (the Act), I request that the Anti-Dumping Commissioner initiate a review of anti-dumping measures in respect of the goods the subject of this application to:

1. **revise the level of the measures** because one or more of the variable factors relevant to the taking of measures have changed (a variable factors review)

In this case the factors that I consider have changed are:

- normal value
- export price
- non injurious price
- subsidy

The variable factors review is in relation to:

- a particular exporter (*if so provide name and country details*)
- exporters generally

or

2. **revoke the measures** because the anti-dumping measures are no longer warranted (a revocation review)

In this case the measure I consider should be revoked is:

- the dumping duty notice
- the countervailing duty notice
- the undertaking

The revocation review is in relation to:

- a particular exporter (*if so provide name and country details*)
- exporters generally

NOTE

Where seeking variable factors review as well as a revocation review, indicate this in *both* 1 and 2 above.

DECLARATION

I believe that the information contained in this application:

- provides reasonable grounds for review of the anti-dumping measure; and
- is complete and correct to the best of my knowledge and belief.

Signature:

Name: [REDACTED]

Position: [REDACTED]

Company: BlueScope Steel Limited

ABN: 16 000 011 058

Date: 2 August 2019

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| Signature requirements | <p>Where the application is made:</p> <p><i>By a company</i> - the application must be signed by a director, servant or agent acting with the authority of the body corporate.</p> <p><i>By a joint venture</i> - a director, employee, agent of each joint venturer must sign the application. Where a joint venturer is not a company, the principal of that joint venturer must sign the application form.</p> <p><i>On behalf of a trust</i> - a trustee of the trust must sign the application.</p> <p><i>By a sole trader</i> - the sole trader must sign the application.</p> <p><i>In any other case</i> - contact the Commission's client support section for advice.</p> |
| Assistance with the application | <p>The Anti-Dumping Commission has published guidelines to assist applicants with the completion of this application. Please refer to the '<i>Instructions and guidelines for applicants: Application for review or revocation of measures</i>' on the Commission's website.</p> <p>The Commission's client support section can provide information about dumping and countervailing procedures and the information required by the application form. Contact the team on:</p> |
| | <p>Phone: 13 28 46 or +61 2 6213 6000 (outside Australia)</p> |
| <p>Fax: (03) 8539 2499 or +61 3 8539 2499 (outside Australia)</p> | <p>Email: clientsupport@adcommission.gov.au</p> |
| | <p>Other information is available from the Commission's website at www.adcommission.gov.au.</p> |
| | <p>Small and medium enterprises (i.e., those with less than 200 full-time staff, which are independently operated and which are not a related body corporate for the purposes of the <i>Corporations Act 2001</i>), may obtain assistance, at no charge, from the International Trade Remedies Advisory (ITRA) Service. For more information on the ITRA Service, visit www.business.gov.au or telephone the ITRA Service Hotline on +61 2 6213 7267.</p> |
| Review Period | <p>The review period is <i>generally</i> the 12 month period preceding the initiation date and ending on the most recently completed month or quarter.</p> |
| | <p>For the purposes of information requested in this application, please consider the review period as the 12 month period ending on the most recently completed quarter prior to the date that you submit the application.</p> |
| | <p>The actual review period will be set by the Commissioner if a review is initiated, and may differ to that used by the applicant in the application form.</p> |
| Required information | <ol style="list-style-type: none">1. Provide details of the name, street and postal address, of the applicant seeking the review. |
| | <ol style="list-style-type: none"><li value="2">2. Provide details of the name of a contact person, including their position, telephone number and facsimile number, and e-mail address. |
| | <ol style="list-style-type: none"><li value="3">3. Name other parties supporting this application. |

4. Describe your interest as an affected party (e.g. are you concerned with the exportation of the goods, the importation of the goods, or part of the Australian industry, or acting on behalf of the Government of an exporting country).
5. Provide details of the current anti-dumping measure(s) the subject of this review application and the goods subject to the measure(s), including:
 - tariff classification
 - the countries and/or companies
 - specified date of publication of the measure
6. If you are an exporter of the goods the subject of this application please answer the following questions:
 - Have you exported the goods to Australia during the review period?
 - If yes, what was the total quantity and total value of the goods exported to Australia during the review period?
 - Have you previously (prior to the review period) exported the goods to Australia?
 - If yes, please provide the total quantity and total value of the goods exported to Australia each year during the three years prior to the review period.
 - Have you exported like goods to countries other than Australia during the review period?
 - If yes, please provide the total quantity and total value of exports of the goods to each other country during the review period. Please indicate if any of the sales are to a related party.

NB: In relation to the goods the subject of this application, 'like goods' means goods that are identical in all respects to the goods the subject of this application or, although not alike in all respects to the goods the subject of this application, have characteristics closely resembling those goods (s 269T(1) refers).

NB: Please note you must provide this information if you are an exporter of the goods the subject of the application. If you are not an exporter of the goods, you may choose to provide information relevant to this question.

7. Provide the names, addresses, telephone numbers and facsimile numbers of other parties likely to have an interest in this matter e.g. Australian manufacturers, importers, exporters and/or users.

**Applications
for review of
variable
factors**

If you are applying for a variable factors review (in box 1 above) provide a detailed statement setting out your reasons. Include information about:

- the factor(s) you wish to have reviewed;
- the amount by which that factor is likely to have changed since anti-dumping measures were last imposed, and evidence in support; and
- in your opinion the causes of the change and whether these causes are likely to persist.

Application

If you are applying for a revocation review (in box 2 above), provide a detailed

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| for a revocation review | <p>statement setting out your reasons.</p> <p>Include evidence in support of your view that there are reasonable grounds for asserting that the measures are no longer warranted. Refer to the '<i>Instructions and guidelines for applicants: Application for review or revocation of measures</i>' as part of preparing your response. If you consider anti-dumping measures are no longer warranted because of:</p> <ul style="list-style-type: none">• <i>no dumping or no subsidisation</i>: provide evidence that there is no dumping, or no subsidy, and why dumping or subsidisation is unlikely to recur if measures were revoked.• <i>no injury</i>: provide evidence that there is no current injury, and there is unlikely to be a recurrence of injury if the measures were to be revoked. |
| Lodgement of the application | <p>In accordance with subsection 269SMS(2) of the Act, this application, together with the supporting evidence, must be lodged by either:</p> <ul style="list-style-type: none">– preferably, email, using the email address clientsupport@adcommission.gov.au, or– post to:<p style="margin-left: 20px;">The Commissioner of the Anti-Dumping Commission GPO Box 2013 Canberra ACT 2601, or</p>– facsimile, using the number (03) 8539 2499 (or +61 3 8539 2499 if outside Australia) |
| Public Record | <p>During a review all interested parties are given the opportunity to defend their interests, by making a submission. The Commission maintains a public record of these submissions. The public record is available on the Commission's website at www.adcommission.gov.au.</p> <p>At the time of making the application both a confidential version (for official use only) and non-confidential version (public record) of the application <u>must</u> be submitted. Please ensure each page of the application is clearly marked "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD". The non-confidential application should enable a reasonable understanding of the substance of the information submitted in confidence, clearly showing the reasons for seeking the review, or, if those reasons cannot be summarised, a statement of reasons why summarisation is not possible. If you cannot provide a non-confidential version, contact the Commission's client support section for advice.</p> |

APPLICATION FOR REVIEW OF VARIABLE FACTORS

BlueScope Steel Limited

1. **Provide details of the name, street and postal address, of the applicant seeking the review.**

The Applicant seeking the review of the variable factors applicable to Aluminium Zinc Coated steel (hereafter referred to as "the subject goods" and/or "aluminium zinc") exported from the People's Republic of China ("China") is BlueScope Steel Limited ("BlueScope"), the sole Australian manufacturer of aluminium zinc coated steel products.

BlueScope's address and contact details are as follows:

Head Office

BlueScope Steel Limited
Five Islands Road
PORT KEMBLA, NSW, 2500

2. **Provide details of the name of a contact person, including their position, telephone number and facsimile number, and e-mail address.**

The relevant contact person(s) at BlueScope in respect of this application for the review of measures is as follows:

Primary Contact

[REDACTED]
Manager – Trade Measures
Telephone: [REDACTED]
Email: [REDACTED]

Alternative Contact

[REDACTED]
Manager – International Trade Affairs
Telephone: [REDACTED]
Email: [REDACTED]

This application has been prepared with the assistance of:

Mr John O'Connor
John O'Connor & Associates
P.O. Box 329, COORPAROO, QLD, 4151
Telephone: (07) 3342 1921
Facsimile: (07) 3342 1931
Email: jmoconnor@optusnet.com.au
ABN: 39 098 650 241

3. Name other parties supporting this application.

The applicant, BlueScope Steel Limited, is the sole producer in Australia of the like goods.

4. Describe your interest as an affected party (e.g. are you concerned with the exportation of the goods, the importation of the goods, or part of the Australian industry, or acting on behalf of the Government of an exporting country).

BlueScope has an interest as an affected party in relation to this application for a review of measures on the basis that BlueScope is:

- an Australian manufacturer of aluminium zinc coated steel the subject of measures; and
- was the original applicant for the imposition of measures in Anti-Dumping Investigation No's. 190 and 193.

5. Provide details of the current anti-dumping measure(s) the subject of this review application and the goods subject to the measure(s), including:

- **tariff classification**
- **the countries and/or companies**
- **specified date of publication of the measure**

The anti-dumping measures were initially imposed by public notice on 5 August 2013 by the then Minister for Home Affairs following consideration of International Trade Remedies Branch Report No. 190 ("Report 190") and International Trade Remedies Branch Report No. 193 ("Report 193").

The anti-dumping measures were applied as follows:

- (a) the anti-dumping duty notice applies to:

- all exporters from China; and
- all exporters from Korea, other than Dongkuk Steel Mill Co Ltd ("Dongkuk").

- (b) The countervailing duty notice applies to:

- all exporters from China, other than Angang Steel Company Limited ("Angang"), Jiangying Zongcheng Steel Co., Ltd ("Zongcheng"), Union Steel China Co., Ltd ("Union Steel") and Yieh Phui (China) Technomaterial Co., Ltd ("YPC").

Following Investigation No. 456 concerning the review of anti-dumping measures on aluminium zinc coated steel, the applicable variable factors that applied to exporters in China and Korea were revised (effective 18 July 2018)¹.

The tariff classification applicable to aluminium zinc coated steel is subheading 7210.61.00 statistical codes 60, 61 and 62.

¹ Refer Australian Dumping Notice No. 2018/95 of 12 July 2018.

6. If you are an exporter of the goods the subject of this application please answer the following questions:

- Have you exported the goods to Australia during the review period?
 - If yes, what was the total quantity and total value of the goods exported to Australia during the review period?
- Have you previously (prior to the review period) exported the goods to Australia?
 - If yes, please provide the total quantity and total value of the goods exported to Australia each year during the three years prior to the review period.
- Have you exported like goods to countries other than Australia during the review period?
 - If yes, please provide the total quantity and total value of exports of the goods to each other country during the review period. Please indicate if any of the sales are to a related party.

NB: In relation to the goods the subject of this application, 'like goods' means goods that are identical in all respects to the goods the subject of this application or, although not alike in all respects to the goods the subject of this application, have characteristics closely resembling those goods (s 269T(1) refers).

NB: Please note you must provide this information if you are an exporter of the goods the subject of the application. If you are not an exporter of the goods, you may choose to provide information relevant to this question.

BlueScope has not exported the goods from the countries nominated in this application for the review of variable factors.

7. Provide the names, addresses, telephone numbers and facsimile numbers of other parties likely to have an interest in this matter e.g. Australian manufacturers, importers, exporters and/or users.

BlueScope understands the following companies are exporters of aluminium zinc coated steel to Australia:

China:

- (i) ANGANG Steel
No.1, Huangang Road, Tiexi district,
Anshan City, Liaoning Province, P.R. China
Tel: 86 510 86032308,
Fax: 86 510 82400522
- (ii) YIEH PHUI (CHINA) TECHNOMATERIAL (YPC)
No.1, Xingdao Avenue, Dongbang Industrial Park, Changshu City,
Suzhou City, Jiangsu Province, P.R. China
- (iii) Jianyin Zongcheng Steel Co Ltd
No. 568 Five Star Road
Jiangyin City, Jiangsu China 214442
Tel: 86 510 6817 2928
Fax: 86 510 8160 1000

(iv) Union Steel Co., Ltd
No. 1, Xingang Road, Xiagang Zone
Jiangyin Riverside Economy Development Area
Jiangyin Jiangsu China 214442

BlueScope understands the following importers would have an interest in the review of the variable factors for aluminium zinc coated steel exported from China:

- (i) Marubeni-Itochu Steel Oceania Pty Ltd (MISO)
P O Box 16055
Melbourne Victoria 3007
Phone - 03-9242 1500
Fax - 03-9242 1599
Web Site - www.benichu.com.au
- (ii) MinMetals Australia Pty Ltd
580 St Kilda Road
Melbourne Victoria 3001
Tel: (03) 9520 6810
Fax: (03) 9521 1815
www.minmetals.com.au
- (iii) Stemcor Australia Pty Ltd
Level 13, 15 Blue Street
North Sydney NSW 2060
Phone - 02-9959 3088
Fax - 02-9925 0844
- (iv) Toyota Tsusho (Australasia) Pty Ltd
231-233 Boundary Road
Laverton North Vic 3026
Phone - 03-8368 7991
Fax - 03-8368 7999
- (v) Wright Steel Pty Ltd
Suite 201, 254 Bay Road
Sandringham Vic 3191
Phone - 03-9598 0050
Fax - 03-9597 0050
- (vi) GS Global Australia Pty Ltd
Lvl 38, 100 Miller Street
North Sydney, NSW. 2060
Phone – 02-9954 0911
Fax – 02-9954 0919
- (vii) CMC (Australia) Pty Ltd
118 Dowd Street
Welshpool, WA 6986
Phone – 08-9258 6066
Fax – 08-9258 6366
- (viii) Ferropacific
Suite 5/9-11 Knox Street
Double Bay, NSW 2028
Phone – 02-9363 3513

(ix) ThyssenKrupp Mannex Pty Ltd
Locked Bag 2103 Pacific Highway
North Sydney NSW 2059
Phone – 02-995 50978
Fax – 02-9925 0084
Web Site <http://www.tk-mannex.com/english/>

(x) Amity Pacific
PO Box 1015, Suite 301, 270 Pacific Highway
Crows Nest, NSW 1585
Phone: +61 (2) 9439 1300
Fax: +61 (2) 9439 1344
Web Site www.amitypacific.com.au

7. If you are applying for a variable factors review (in box 1 above) provide a detailed statement setting out your reasons. Include information about:

- **the factor(s) you wish to have reviewed;**
- **the amount by which that factor is likely to have changed since anti-dumping measures were last imposed, and evidence in support; and**
- **in your opinion the causes of the change and whether these causes are likely to persist**

I. Background

The anti-dumping measures the subject of this application for review were initially imposed by public notice on 5 August 2013 by the then Minister for Home Affairs following consideration of Report No. 190 (“Report 190”). The nominated investigation period for case 190 was from 1 July 2011 to 30 June 2012.

On 3 August 2015, Anti-Dumping Notice No. 2015/83 announced the Minister’s decision to apply revised variable factors in relation to exports to Australia by the Korean exporter Dongbu Steel Co Ltd (“Dongbu”). Report No. 272 and 273 applies.

The findings resulted in the dumping margin for Dongbu reducing from 5.8% to 0%.

On 7 December 2016, an initiation of a review of measures investigation for the subject goods, as requested by Dongbu Steel (Korea). The Commission established an inquiry period of 1 October 2015 to 30 September 2016. The findings were published on 19 July 2017, resulting in a change to the relevant variable factors (ADN 2017/86 refers).

On 10 November 2017, Anti-Dumping Notice 2017/156 (“EPR 456”) was published advising of the initiation of a review of measures applicable to the subject goods from China and Korea (except for exports by Dongkuk). The review commenced following a request by the Assistant Minister for Industry, Innovation and Science, and the Parliamentary Secretary to the Minister for Industry, Innovation and Science to review the dumping and countervailing measures as they affected exporters of the subject goods to Australian from China and Korea.

The review period was 1 October 2016 to 30 September 2017. The findings (“Report 456 & 457”) were published on 17 July 2018 resulting in the application of contemporary variable factors.

In parallel with Investigation 456, on 10 November 2017 *Continuation Inquiry No. 450* ("Report 449 & 450") was initiated regarding the continuation of anti-dumping and countervailing measures. The Commission established an inquiry period of 1 October 2016 to 30 September 2017. The final determination by the Minister for this inquiry was published on 17 July 2018, resulting in the continuation of anti-dumping and countervailing measures on exports from China and the revocation of measures applicable to exports from Korea.

BlueScope seeks to ensure that the measures are effective in preventing further material injury to the Australian industry. BlueScope requests that the Commission undertake a review of measures applicable to exports of aluminium zinc coated steel exported from China for the contemporary investigation period (i.e. twelve-months ending 30 June 2019), and apply contemporary variable factors that reflect normal values, export prices and non-injurious prices across the 1 July 2018 to 30 June 2019 period.

II. Grounds for Review of variable factors

The variable factors for each exporter the subject of anti-dumping measures have materially changed since the findings of the last completed Review ADC 456 (for aluminium zinc coated steel sold domestically in China). BlueScope considers that contemporary measures are required so that the measures are effective and address the injury that the measures are intended to prevent. Raw material steel costs have increased since the investigation period in Investigation 456. The changes in raw material inputs have resulted in increases in each of the following variable factors, namely:

- Ascertained Normal Value;
- Ascertained Export Price; and
- Non-injurious price.

BlueScope further understands that the Government of China ("GOC") continues to influence subsidies available to Chinese steel manufacturers, including varying the VAT rebate on exported steel products.² BlueScope is also seeking a review of the subsidies applicable to Chinese exporters of aluminium zinc coated steel.

Ascertained Normal Value – China

In Investigation 456, the Commission continued to be satisfied that a particular market situation for aluminium zinc coated steel (as per subsection 269TAC(2)(a)(ii) of the *Customs Act 1901* ("the Act")) exists in the Chinese domestic market that renders domestic selling prices in that market unsuitable for the determination of a normal value under subsection 269TAC(1).

The Commission has also concluded that hot-rolled coil steel ("HRC") accounts for approximately 80 per cent of the cost to make aluminium zinc coated steel, and is therefore a key determinant of the domestic price of the subject goods in China.³

During *Continuation Inquiry Report 450* and *Review Inquiry Report 456*, the Commission conducted an analysis of the market for aluminium zinc coated steel in China. The Commission concluded that the Government of China ("GOC") materially influences conditions within the subject goods market, and, because of the significance of this influence, that domestic prices for Chinese aluminium zinc coated steel are substantially

² Export Tax Rebates in China Increase for 397 Products; China Briefing Sept., 17 2018.

³ Report 456 & 457, p. 18.

different to what they would otherwise be absent these interventions.⁴

BlueScope contends that the GOC continues in 2019 to materially influence conditions within the Chinese market for aluminium zinc coated steel.

Following this market situation finding, the Commission has sought to construct normal values for Chinese exporters under subsection 269TAC(2)(c), using the cost of production, selling, general and administration expenses, and an amount for profit.

In determining the cost of manufacture, the Commission concluded in Reports 190 and Report 456 & 457 that HRC prices recorded by Chinese aluminium zinc coated steel producers did not reflect competitive market costs. On this basis, the Commission has relied on verified HRC purchase costs for Korean and Taiwanese exporters, concluding that these markets are comprised of several producers, and buyers and sellers of HRC, in an environment free of government distortion or other influence.⁵

BlueScope contends that this external benchmark continues to represent the most suitable methodology for HRC cost replacement under subsection 269TAC(2)(c).

Confidential Figure 1 details domestic HRC steel prices for Korea and Taiwan from October 2016 to June 2019 (Source: [REDACTED]). This includes an average of the two country's prices.

For Korea, the figure shows that domestic HRC steel prices – the key raw material input in the production of aluminium zinc coated steel that accounts for approximately 80 per cent of the production cost - have trended upwards post the Report 456 & 457 investigation period. For Taiwan, domestic HRC steel prices have also trended upwards, but to a greater extent than Korea's, subsequent to the same investigation period.

On an AUD per metric tonne basis, a comparison between the inquiry period in Report 456 & 457 to the proposed inquiry period in this application yields the following HRC price increase differentials:

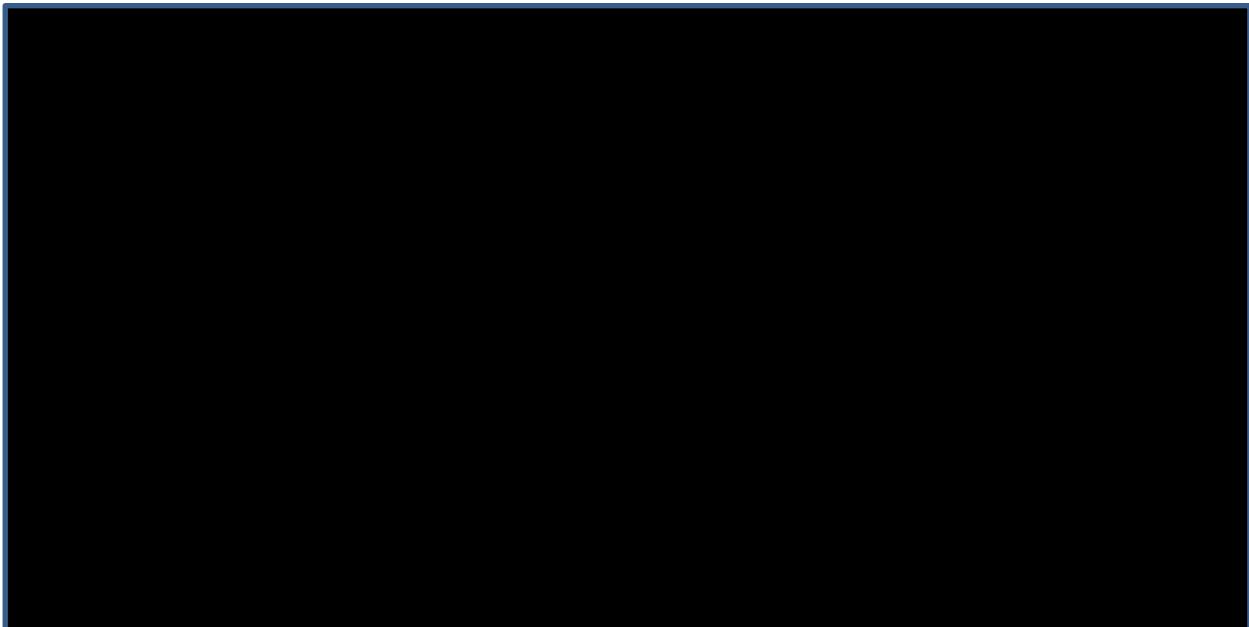
- Korea from AU\$ [REDACTED] (Oct. 16 – Sept. 17) to AU\$ [REDACTED] (FY2019); an increase of [REDACTED]%; and
- Taiwan from AU\$ [REDACTED] (Oct. 16 – Sept. 17) to AU\$ [REDACTED] (FY2019); an increase of [REDACTED].

Figure 1 below identifies the domestic HRC price movements in each of the Korean and Taiwanese domestic markets, along with a combined Korea and Taiwan trend line, from October 2016.

⁴ Report 456 & 457, p.18.

⁵ Ibid.

Figure 1 – Domestic HRC price movements – Korea and Taiwan, and combined

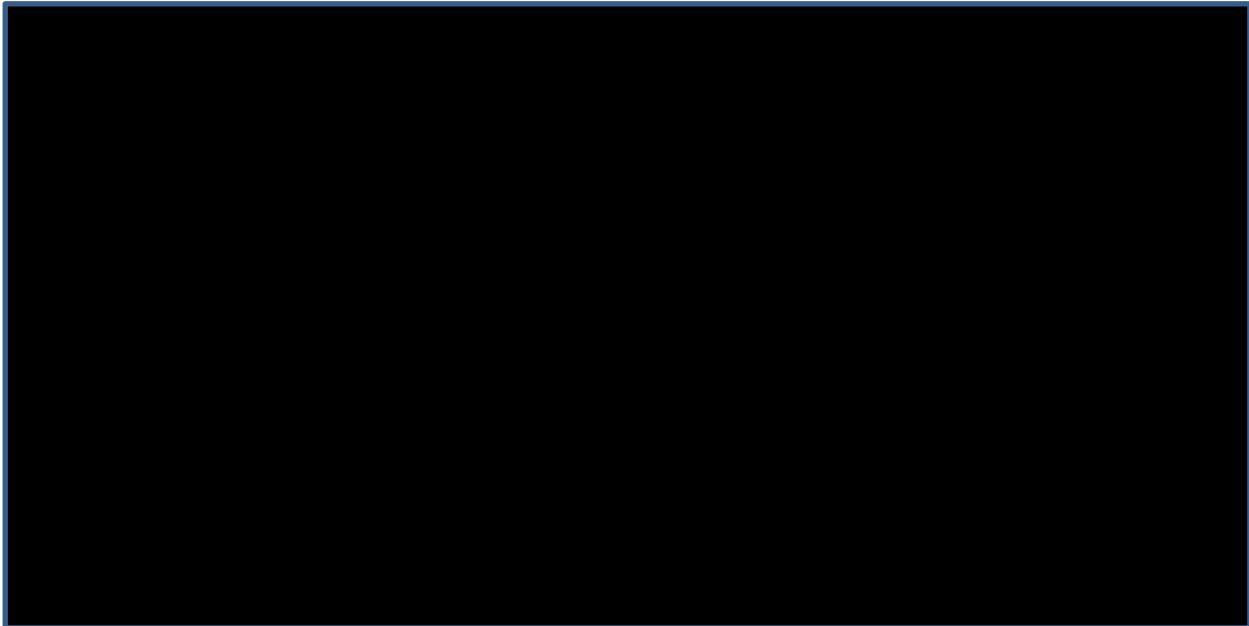


Confidential Figure 1 – Movement in domestic HRC steel prices for Korea, Taiwan, and combined (Source: █)

The relevant consideration is that domestic selling prices for HRC have increased materially in the twelve-months ending 30 June 2019 to the previous investigation period of Investigation's 456 & 457 (i.e. from 1 October 2016 to 30 September 2017).

As further evidence of the increase in raw material HRC prices, BlueScope refers the Commission to the following █ South East Asia Hot Rolled Coil Price Index for 2016 to 2019. The HRC price index confirms a substantial and material increase in HRC prices in South East Asia following the investigation period in Investigation's 456 & 457.

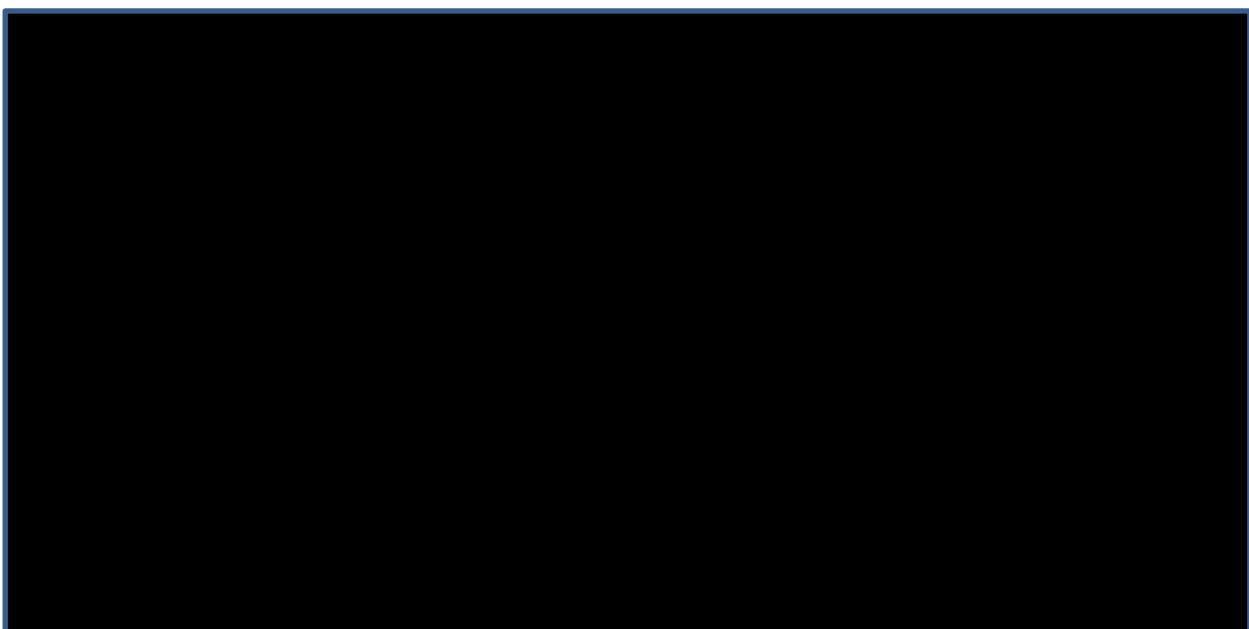
Figure 2 - ■■■ HRC Price Index South East Asia



Confidential Figure 2 – South East Asian HRC Price Index; FY2016-FY2019 (Source: ■■■).

The key driver for the change in the HRC prices is the change in the traded prices for the main raw materials used in steel making (i.e. iron ore and coking coal). Confidential Figure 3 depicts a strong correlation between the movement in iron ore and coking coal prices, and the above-noted movements in Korean and Taiwanese HRC prices.

Figure 3 – ■■■ Iron Ore and Coking Coal Prices



Confidential Figure 3 – ■■■ Ore and Hard Coking Coal Price Index; FY2016-FY2019.

Outlook for Raw Materials and Steel Prices

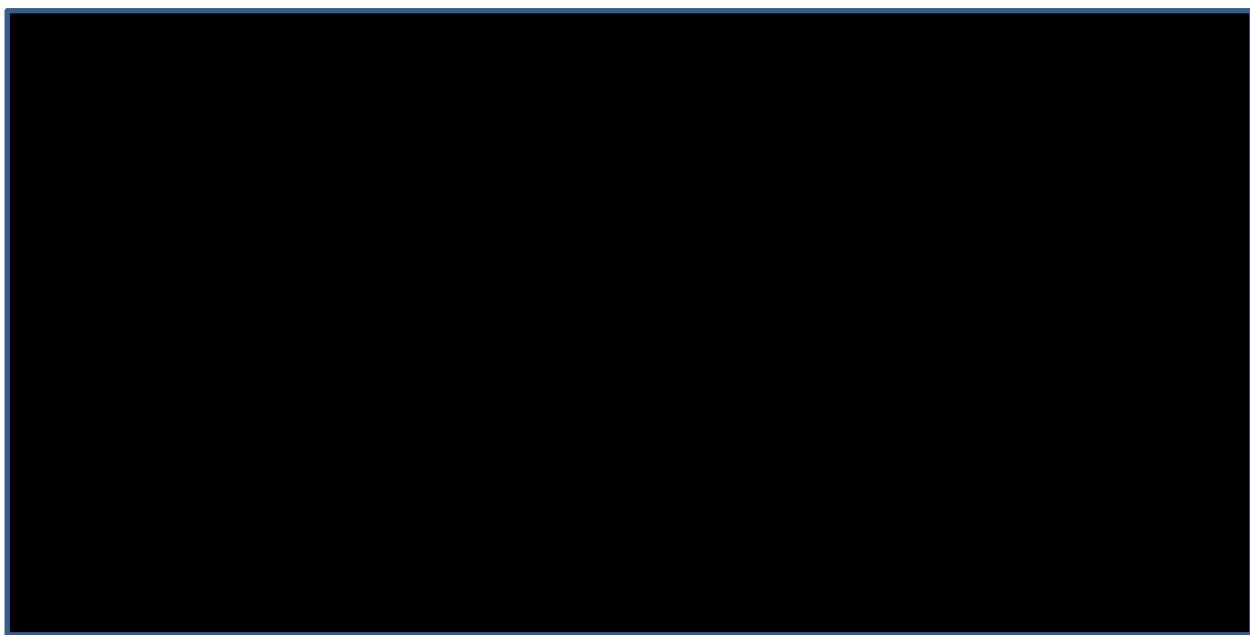
BlueScope submits that the current price levels for aluminium zinc coated steel are sustainable due to the continued strong demand for steel in China, driving ongoing demand for steel making raw materials (including HRC) and downstream steel products. This is supported by [confidential market intelligence].⁶

Ascertained Export Price

Consistent with movements in domestic normal values, steel export prices are also impacted by raw material costs. Increases in steel prices, as influenced by raw materials, have also resulted in export price increases for the subject goods from China (and all other exporting countries).

Export prices for aluminium zinc coated steel from China have increased following the changes made to the variable factors per Investigation 456. Commencing from quarter two of fiscal year 2017 (and therefore including the variable factors review investigation period), import prices have trended as follows:

Figure 4 – Chinese aluminium zinc coated exported prices to Australia



Confidential Figure 4 – China aluminium zinc coated steel FOB Australian import prices (Source: █)

BlueScope would highlight with the Commission that weighted average export prices have increased █% per cent from the investigation period in Investigation 456 to the twelve months ending June 2019.

⁶ █

Subsidies - China

BlueScope notes the recent findings in Review Inquiry No. 419 involving hollow structural sections (“HSS”) exported from China. The Commission examined 45 subsidy programs as part of the inquiry (of which 28 programs were examined in the original Investigation No. 177), as well as 17 additional subsidy programs identified during Continuation Inquiry No. 379.

In the original zinc coated (galvanized) steel and aluminium zinc coated steel investigation (No. 193) the Commission identified 29 programs (of which 27 programs were examined in Investigation No. 177). A further seven programs were identified in the initial stages of the inquiry and were also investigated. In Continuation Inquiry No. 449 & 450, the Commission investigated 36 subsidy programs, and concluded that all but two of these were countervailable.

The Commission determined in the above-noted Review Inquiry No. 419 that all 45 programs were countervailable (36 programs of which were also confirmed as countervailable in the earlier Continuation Inquiry No. 449 & 450 on zinc coated ((galvanized) steel and aluminium zinc coated steel). BlueScope considers that the subsidy programs identified in Review Inquiry No. 419 (i.e., 45 programs) continue to exist and provide benefits to exporters of the subject goods in China.

BlueScope submits that the GOC has not altered support for its domestic steel producers, and that it continues to offer a broad range of subsidies to the industry. There has been no evidence available to the Commission (as concluded recently in Investigation No. 419) that Chinese steel manufacturers no longer receive countervailable benefits.

BlueScope therefore contends that Chinese producers of aluminium zinc coated steel continue to receive countervailable benefits, and that these should be re-assessed in the context of a review of variable factors inquiry on exports to Australia from China.

Recommendation

To ensure that remedies are effective in preventing material injury to the Australian aluminium zinc coated steel industry, BlueScope requests that the Commission undertake a review of variable factors based on a contemporary investigation period and apply contemporary variable factors to subject exporters in China.

For the proposed investigation period (i.e. twelve months ending 30 June 2019), there has been an increase in normal value steel prices sold in China that are the subject to the measures, as compared to the earlier periods where the measures were last reviewed (Investigation 456).

The increase in HRC prices – the primary raw material input used in the manufacture of aluminium zinc coated steel – has been as a consequence of increases in steelmaking raw material prices.

BlueScope further contends that export prices have not increased to reflect the full change in raw material HRC input prices and it is considered likely that certain exporters have commenced dumping. BlueScope requests a review of the *Dumping Duty Notice* as it applies to all Chinese exporters of aluminium zinc coated steel to Australia.