

8 October 2020

Mrs Olivia Tsang  
Assistant Director, Investigations Unit 4  
Anti-Dumping Commission  
GPO Box 1632  
Melbourne Victoria 3001

**Public File**

Dear Ms Tsang,

**Anti-Dumping/Subsidisation Investigation No. 558 – Aluminium Zinc Coated Steel exported from Korea, Taiwan, and Vietnam**

**I. Introduction**

BlueScope Limited (“BlueScope”) the sole member of the Australian industry producing like goods to the goods the subject of the above-noted inquiry, refers to the submission by Appleton Luff Pty Ltd on behalf of Yieh Phui Enterprise Co. Ltd (“Yieh Phui”), regarding a product exemption (EPR Document 10), and makes the following observations and comments in response.

**II. Product Exemption Request – PhuizerFan**

BlueScope notes Yieh Phui’s claim that its aluminium-zinc alloy coated steel equivalent product PhuizerFan should not have been included within the goods under consideration in this investigation. This claim is misplaced and does not accord with the facts. Simply put, PhuizerFan is just one of the many aluminium zinc alloy coated steel products manufactured and sold around the world. These aluminium zinc alloy coated steel products are variants of the generic aluminium-zinc coated steel made either with or without the addition of magnesium.

PhuizerFan is Yieh Phui’s brand name for its aluminium zinc alloy coated steel product variant that has a coating composition of 5% aluminium and zinc, and is essentially the same product as the generically named GALFAN® product made and sold by a number of other steelmakers under licence (GALFAN® Technology Centre Inc.). It is these combined coating elements of aluminium and zinc that comprise the essential character of the product, in that its corrosion performance as an aluminium zinc alloy coated steel product is superior to that of zinc coated (i.e. galvanised or GI) steel.

Yieh Phui’s PhuizerFan product data sheet<sup>1</sup> clearly demonstrates that it is manufactured and sold to comply to AS1397<sup>2</sup> (coating type ZA). PhuizerFan is offered across a very wide range of thicknesses and across the full range of steel base mechanical properties and coating mass options under AS1397.

Steel products that are coated with an alloy of aluminium and zinc also compete against steel that is coated with an alloy of aluminium, zinc and magnesium, such as [REDACTED] and [REDACTED], sold into the Australian market.

<sup>1</sup> Non-Confidential Attachment 1: PhuizerFan Data Sheet. Further information can also be found at [https://www.yiehpui.com.tw/upload/myfiles/catalog/5\\_Al-Zn-201907.pdf](https://www.yiehpui.com.tw/upload/myfiles/catalog/5_Al-Zn-201907.pdf)

<sup>2</sup> Non-Confidential Attachment 2: AS 1397-2011 *Continuous hot-dip metallic coated steel and strip – Coatings of zinc and zinc alloyed with aluminium and magnesium.*

ZINCALUME® steel is BlueScope's Australian made variant of an aluminium zinc alloy coated steel product that has a coating composition of aluminium, zinc and magnesium.

In Yieh Phui's submission, it is asserted that its PhuizerFan product is both "not identical" to BlueScope's ZINCALUME® aluminium zinc alloy coated steel product and that it is "different" to the goods the subject of BlueScope's application. Whether the goods are identical or "different" is not the issue. The Commission is required to examine whether the Australian industry manufactures "like goods" to the imported goods. In examining whether the locally produced goods are alike to the imported goods, the Commission has regard to the essential characteristics of the locally produced and imported goods.

The Commission (in Consideration Report No. 558 at Section 2.5.3) examined the essential characteristics of whether the goods are *alike*, including:

- physical likeness – the locally produced and the imported goods appear to be traded in a similar range of steel grades, coating types, lengths, widths and thicknesses (i.e. the same physical characteristics);
- commercial likeness – the locally produced goods and the imported goods compete directly in the Australian market – there exists a commercial likeness;
- functional likeness – the locally produced and imported goods are used interchangeably in the same end-use and compete for sales to the same customers – there exists a commercial likeness;
- production likeness – the production process and the raw material inputs are substantially identical for the locally produced and imported goods. Both goods are manufactured using similar processes.

Having examined the key requirements of physical, commercial, functional and production likeness it is reasonable to conclude that the locally produced goods are alike in all respects to the imported goods. The goods are used interchangeably in the same end-use applications and compete directly for supply with the same customers.

PhuizerFan is made and sold by Yieh Phui as its own variant of the more commonly known GALFAN® aluminium zinc alloy coated steel product, that is marketed and sold into the Australian market and as such is one of the products specifically identified to be within the goods under consideration in this inquiry.

BlueScope affirms the Commission's assessment in Consideration Report 558 that the locally produced goods are alike to Yieh Phui 's PhuizerFan product – that is, whilst perhaps not identical in composition, it contains the same essential characteristics as the imported goods and are therefore "alike".

If you have any questions concerning this submission, please do not hesitate to contact me on [REDACTED] [REDACTED].

Yours faithfully,

[REDACTED] [REDACTED]