

1 April 2021

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

Email: Investigations4@adcommission.gov.au

Public File

Dear Ms Tsang,

Anti-Dumping/Subsidisation Investigation No. 558 – Aluminium zinc coated steel exported from Korea, Taiwan and Vietnam – Goods Description Matter

We refer to the further submission dated 24 March 2021 on behalf of POSCO concerning the PosMAC product and the goods description for Investigation 558.

BlueScope Steel Limited (“BlueScope”) does not seek to detract from its earlier submissions (EPR Documents 31 & 33). BlueScope reiterates that the goods description for Investigation 558 (as reflected in ADN 2020/067) includes all aluminium zinc magnesium coated steel product variants regardless of the amount or percentage of aluminium contained within the total coating. This includes the PosMAC product.

Additionally, BlueScope is aware of locally supplied ZAM product which is, like PosMAC, (an aluminium zinc magnesium alloy coated product that contains a minor percentage of aluminium) that was included in the goods description in investigation ADN 2020/067.

Irrespective of the amount of aluminium contained within aluminium zinc magnesium alloy coatings (i.e. whether aluminium is a minor component or a major component), all variants of aluminium zinc magnesium alloy coated steel products are the goods subject to this investigation.

The Anti-Dumping Commission’s (“the Commission”) published File Note (EPR Document 028) on 1 February 2021 stated that *“In this case, the Commission is presently of the view that the standards listed in the goods description are exhaustive.”* BlueScope agrees with the Commission’s statement that the Standards define the goods.

BlueScope has demonstrated in its earlier submissions to the Commission (EPR Documents 31 & 33) that the International Standard EN 10346, an international standard applicable to aluminium zinc alloy coated steel products, details a range of coated products including the aluminium zinc magnesium coated steel variants that contain a minor aluminium composition. This EN 10346 standard that was listed in the Table in the Commission’s File Note includes the PosMAC product.

BlueScope understands that at the time of publishing the File Note, the Commission did not appear to be aware of the full detail and coverage of EN 10346, however it is clear that PosMAC as an aluminium zinc magnesium alloy coated steel product does meet and comply with all of the requirements of this standard. The fact that PosMAC does comply and meets the requirements of the listed EN 10346 is not disputed.

BlueScope notes that the POSCO representations seek to argue sub-categories within EN 10346. BlueScope agrees that EN 10346 covers a broad range of continuously hot dip coated steel products

including hot-dipped zinc coated, hot dipped zinc iron coated and hot dipped zinc silicon coated steel as well as a range of hot dipped aluminium-zinc alloy coated steels with and without the addition of magnesium. All coatings included within EN 10346 that are not coated or plated with an aluminium zinc alloy coating (with or without magnesium) are automatically excluded from this investigation per the initial particular of the goods description.

It is clear, therefore, that EN 10346 – contrary to POSCO's assertions about how sub-categories may be "parenthesized" in attempt to exclude PosMAC from the broad range of coated steel products – is nevertheless covered by EN 10346.

The POSCO submission of 24 March 2021 fails to demonstrate that its aluminium zinc magnesium alloy coated steel (i.e. PosMAC) is not covered by the standard EN 10346. BlueScope agrees with the Commission's determination that the applicable Standards define the goods and as such the aluminium zinc magnesium alloy coated steel product PosMAC is covered by the goods description as detailed in ADN 2020/067.

This most recent submission dated 24 March 2021 on behalf of POSCO has not shed any new light on the matter and BlueScope anticipates that the Commission has all the relevant information and facts at hand to conclude that PosMAC is subject to the notice.

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

Yours faithfully,

[REDACTED]
Manager – Trade Measures