

14 March 2022

Ms Sharini McEwen Anti-Dumping Commission GPO Box 1632 Melbourne Victoria 3001

Email: Investigations4@adcommission.gov.au

Public File

Dear Ms McEwen,

Anti-Dumping Continuation 594 – Hot Rolled Coil Steel exported from Taiwan

This submission is made on behalf of BlueScope Limited (**BlueScope**), an Australian industry applicant, in relation to measures applying to Hot Rolled Coil steel (**HRC**) exported from Taiwan.

In relation to the Model Control Code (**MCC**) structure as disclosed in ADN 2022/002, BlueScope submits that a modification is required to the Thickness (**BMT**) category¹ to ensure that the like goods and subject goods are accurately assessed during the inquiry. BlueScope requests that a fourth subcategory under the BMT category be included (hereafter referred to as **T4**), covering the thickness range equal to or greater than 4.75 millimetres (**mm**).

In HRC Review No. 528 (**REV 528**), the Commission considered BlueScope's request to expand the BMT MCC category in a similar manner, on that basis that the like goods and subject goods are manufactured to a thickness point of 4.75mm or greater.² This sub-set of the manufactured goods has been consistently assessed as the goods subject to the measures since original trade remedies investigation No. 188.³ The Commission subsequently confirmed the inclusion of the T4 category in REV 528, as mandatory for sales and cost data in the Australian industry questionnaire, and the exporter and importer questionnaires.⁴

BlueScope submits that there are key price and cost differences for the T4 category of goods,⁵ and that their inclusion in the current inquiry is critical to continually ensure the like and subject goods are comprehensively assessed.

For and on behalf of BlueScope.

¹ Category No. 5.

² In coil form only.

³ Hot Rolled Coil steel Japan, Korea, Malaysia, and Taiwan.

⁴ REV 528, EPR Folio No. 4 (https://www.industry.gov.au/sites/default/files/adc/public-record/528-005 - file_note_model_control_code_additional_instructions.pdf).

⁵ As evidenced in BlueScope's submitted confidential Appendix A4.