3 November 2026

Director – Investigations 3
Australian Trade Remedies Commission
GPO Box 2013
Canberra ACT 2601

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PUBLIC RECORD

Dear Director,

Accelerated Review No. 722 – Aluminium zinc coated steel exported from China

Submission by BlueScope Steel Limited

1. Introduction

BlueScope Steel Limited (BlueScope) makes this submission in Accelerated Review No. 722 (**AR 722**), concerning the dumping duty notice and countervailing duty notice applying to aluminium zinc coated steel (**AlZn**) exported from the People's Republic of China (China), insofar as those notices apply to Shandong Shinmade Material Tech Co., Ltd (**Shinmade**).

The Australian Trade Remedies Commission (**Commission**) issued the notice initiating AR 722 on 13 October 2026 and recorded 18 September 2026, the date on which Shinmade's application was lodged, as the commencement date. The review period is 1 July 2025 to 30 June 2026. The initiating notice records the Commission's preliminary view, based on the information presently available, that Shinmade meets the new-exporter requirements and that there are no current grounds to reject the application.[1] BlueScope does not seek to challenge that preliminary position on the existing public record.

BlueScope's submission addresses the applicant-specific variable factors to be determined in AR 722. Eligibility for an accelerated review does not determine those factors, which must be based on verified evidence concerning Shinmade and the review period. Earlier Commission findings and methodologies may inform that assessment, but their relevance depends on their application to Shinmade's circumstances.

Against that framework, BlueScope submits that four matters require particular examination:

- the statutory and evidentiary basis for export price and any resulting dumping margin, given Shinmade's statement that it has not exported the goods, or a similar general category of goods, to Australia;
- the construction of normal value, including the treatment of HRC input costs and the appropriateness of the benchmark and updating methodology proposed by Shinmade;

[1] Australian Trade Remedies Commission, Trade Remedies Notice No. 2026/146, *Application for Accelerated Review No. 722* (13 October 2026) (**TRN 2026/146**), pp. 1 and 4–6.

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- the countervailing duty notice, which the application seeks to review but does not substantively address in its public reasoning; and
- Shinmade's new-exporter status and the corporate, production and export arrangements relevant to any applicant-specific treatment.

2. The application and review framework

Shinmade states that it is a manufacturer of the goods and has never exported AlZn coil to Australia, either during the original investigation period or since the measures were imposed. It also states that no related party exported the subject goods to Australia during the original investigation period and that it is not related to a Chinese producer or exporter examined in the original investigation.[2]

The Commission records that its review of the original investigation reports and ABF import data did not identify Shinmade as a supplier during the original investigation period, and that there is presently no evidence suggesting that Shinmade is related to an exporter whose exports were examined. The initiating notice also recognises that, if relevant evidence emerges during the review, the Commissioner may reject the application or terminate the review in accordance with the Act.[3]

Shinmade states that it is presently subject to a "country-wide dumping duty rate" of 33.0 per cent.[4] This appears to refer to the effective duty rate applicable to the 'all other exporters' category, determined in Review No. 522, comprising an effective dumping duty rate of 12.2 per cent and a countervailing duty rate of 20.8 per cent. The underlying dumping margin determined for uncooperative and all other exporters in Review No. 522 was 22.5 per cent. In determining the 12.2 per cent effective dumping duty rate, the Commission deducted the margin attributable to the subsidy program concerning hot rolled steel provided by government at less than fair market value (the LTAR margin) from the dumping duty rate.[5] Shinmade states that it did not have the opportunity to obtain applicant-specific variable factors in the earlier proceedings and requests that those factors now be determined by reference to its own circumstances.[6]

Shinmade's new-exporter status does not determine the variable factors that should apply following the review. The Commission should determine those factors from verified information concerning Shinmade and the review period, without presuming either that the existing all-other-exporter variable factors should remain unchanged or that Shinmade's proposed factors should be accepted.

3. Export price and the claimed dumping margin

Shinmade states that it has not made any exports of the subject goods or a similar general category of goods to Australia and therefore has no information with which to estimate contemporary export prices. Its application nevertheless presents an estimated export price and a dumping margin of zero per cent.[7]

The public application does not explain the statutory or factual basis for the proposed export price. In particular, it does not state whether Shinmade relies on section 269TAB(3) of the Customs Act 1901 (Cth), consistently with the approach adopted in

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[2] Shandong Shinmade Material Tech Co., Ltd, *Application for Accelerated Review No. 722* (15 September 2026) (**Shinmade application**), responses to questions 4–7 concerning the applicant's role, new-exporter status, previous accelerated-review applications and relationships with exporters examined in the original investigation.

[3] TRN 2026/146, pp. 4–6.

[4] Shinmade application, response to question 8, p. 3.

[5] Anti-Dumping Commission, *Final Report Nos. 521 and 522: Review of the Anti-Dumping Measures Applying to Zinc Coated (Galvanised) Steel and Aluminium Zinc Coated Steel*, 15 February 2021 (**REP 521 and 522**), sections 4.7.3, 5.4.2 and 7.3.2, including Table 27, p. 96; Australian Trade Remedies Commission, Dumping Commodity Register – Aluminium Zinc Coated Steel, current at November 2026, p. 7.

[6] Shinmade application, response to question 8, p. 3, concerning why the existing measures are considered inappropriate to Shinmade.

[7] Shinmade application, response to question 8, sections "Contemporary export prices", "Contemporary normal values" and "Contemporary dumping margin".

REP 694, or on an actual or proposed transaction or other pricing evidence. Interested parties therefore cannot identify the proposed methodology or assess the information and adjustments underlying the estimate.

The absence of historical Australian exports does not prevent an accelerated review. Where the available information does not permit the Commission to ascertain export price under the preceding subsections of section 269TAB, subsection 269TAB(3) allows the Commission to determine export price having regard to all relevant information. In REP 694, the Commission applied that provision by setting export price equal to normal value because Xinyu had not exported the goods to Australia during the review period. That approach produced a zero per cent dumping margin and a floor-price duty method under which dumping duty becomes payable if the actual export price falls below the floor price.[8]

Shinmade's proposed outcome is therefore not objectionable merely because it produces a zero per cent dumping margin in the absence of Australian exports. The relevant question is whether the section 269TAB(3) methodology has been applied appropriately to Shinmade and whether the information used to determine export price and normal value is complete and reliable.

Before determining an applicant-specific export price and dumping outcome, BlueScope submits that the Commission should:

- identify the statutory provision and methodology used to determine export price;
- if relying on an actual or proposed Australian price, verify the source, timing and commercial status of that price, including any relevant contract, order, quotation or post-lodgement transaction;
- if determining export price by reference to normal value under section 269TAB(3), identify the relevant information supporting that approach and explain its application to Shinmade;
- verify that the information relied upon concerns goods falling within the operative goods description and, where relevant, goods produced by Shinmade;
- where the methodology compares an independently determined export price with normal value, ensure that the goods, terms and level of trade are comparable and make any necessary adjustments; and
- determine the appropriate form of measure by reference to the methodology and applicant-specific variable factors.

The Commission should neither infer nor reject a zero per cent dumping margin merely because Shinmade has not made Australian exports. Its recommendation should instead identify the evidence and statutory methodology supporting the export price and resulting dumping margin.

If the Commission determines export price by reference to normal value, the reliability of the dumping outcome will depend directly on the normal value adopted. The construction of Shinmade's normal value is therefore central to the outcome of the review.

4. Normal value and Chinese HRC input costs

Shinmade constructs quarterly normal values using an external HRC benchmark. Its public application does not propose using Shinmade's recorded HRC acquisition costs as the starting point. It uses the September quarter 2025 benchmark applied in REP 694, updates later quarters by movements in quarterly LME Steel HRC FOB prices, and converts the result to CRC and AlZn using confidential yield and conversion inputs. It then adds SG&A, profit, inland transport and port handling.[9]

Because HRC is the principal raw-material input used to manufacture AlZn, Shinmade's proposed normal value depends materially on the selection and application of the HRC benchmark. BlueScope does not challenge the use of an external HRC benchmark in principle. The relevant question is whether Shinmade has correctly applied the proposed methodology and whether its underlying assumptions remain appropriate to Shinmade and the AR 722 review period.

[8] Anti-Dumping Commission, *Final Report No. 694: Accelerated Review of the Dumping Duty Notice and Countervailing Duty Notice Applying to Zinc Coated (Galvanised) Steel Exported to Australia from the People's Republic of China by Tianjin Xinyu Color Plate Co., Ltd*, 13 March 2026 (**REP 694**), sections 3.1–3.2, pp. 13–14; chapter 5, p. 18; section 8.2, p. 24.

[9] Shinmade application, response to question 8, p. 3, section "Contemporary normal values".

REP 658 provides relevant context for assessing Shinmade's HRC costs. In that review, the Commission found that a particular market situation existed in the Chinese domestic HRC market during the investigation period and that the Government of China's continued involvement in the Chinese steel industry materially contributed to overcapacity, oversupply and the market's distorted structure. Those findings do not determine the treatment of Shinmade's costs in AR 722, which must rest on verified evidence relevant to Shinmade and the review period.[10]

In REP 694, the Commission calculated normal value under section 269TAC(2)(c) using Xinyu's production costs, with HRC costs adjusted by reference to the REP 611 benchmark and movements in the London Metal Exchange HRC steel FOB China index.[11] Shinmade states that its constructed normal value follows the approach adopted in REP 694 and uses the September quarter 2025 benchmark from that review as its starting point.[12] The Commission should therefore establish whether Shinmade has applied it correctly and whether the benchmark and updating mechanism remain appropriate to Shinmade's production during the AR 722 review period.

In particular, BlueScope submits that the Commission should examine:

- the source, product specification and delivery basis of the September quarter 2025 HRC benchmark and its comparability to Shinmade's HRC inputs;
- whether Shinmade applied the REP 694 benchmark and timing adjustment consistently, including the relevant index, observation periods, currency and delivery basis;
- whether the LME series provides a reasonable basis for updating the benchmark throughout the AR 722 review period, including whether the series is comparable in product, market and level of trade;
- whether Shinmade's input sourcing, production yields, conversion costs and other manufacturing assumptions reconcile with its verified production and accounting records; and
- the completeness and appropriateness of the SG&A, profit, inland transport, port-handling and other adjustments used to construct normal value.

BlueScope does not propose a particular benchmark or submit that REP 658, standing alone, requires the Commission to reject Shinmade's recorded HRC costs. It submits that the Commission should determine the appropriate treatment from the applicable statutory methodology and verified evidence concerning Shinmade and the review period. Any substitute benchmark should be appropriate to the input being valued and applied through transparent, verifiable adjustments. The final report should explain how the selected methodology applies to Shinmade's circumstances.

5. Countervailing variable factors

AR 722 concerns both the dumping duty notice and the countervailing duty notice.[13] The public application substantively addresses the dumping inquiry but does not establish what, if any, applicant-specific countervailing variable factors should replace the existing factors. It identifies a proposed export price, constructed normal value, dumping margin and floor price, but does not identify a proposed subsidy margin or otherwise substantively address the countervailing variable factors.[14]

A dumping determination does not resolve whether Shinmade received countervailable benefits. The Commission should therefore determine separately, from verified information, whether Shinmade received such benefits during the review period and, if so, the amount attributable to the goods.

[10] Anti-Dumping Commission, *Final Report No. 658: Hot Rolled Coil Steel Exported from the People's Republic of China*, 2 April 2026 (**REP 658**), section 6.3.3.1, p. 56; Appendix A, section A.1, p. 116; Australian Trade Remedies Commission, Dumping and Subsidy Manual, December 2021, concerning the need for Commission decisions to be based on the facts of the individual case.
[11] REP 694, sections 4.1–4.3, pp. 15–16.
[12] Shinmade application, response to question 8, p. 3, section "Contemporary normal values".
[13] TRN 2026/146, pp. 1–2, section "The goods".
[14] Shinmade application, response to question 8, p. 3, sections "Contemporary export prices", "Contemporary normal values" and "Contemporary dumping margin".

That assessment should address any relevant programs disclosed by Shinmade or otherwise identified by the Commission, including programs concerning production inputs, taxation, grants or financing. The Commission should reconcile those disclosures with Shinmade's financial, accounting and related-party records.

The different exporter-specific subsidy outcomes in REP 658 illustrate why the countervailing analysis must turn on the evidence concerning the particular applicant.[15] Those earlier outcomes do not determine the factors that should apply to Shinmade.

The absence of a substantiated proposal does not mean that the existing countervailing variable factors necessarily reflect Shinmade's circumstances. It means that the public application does not presently provide a sufficient basis for determining whether, or to what extent, those factors should change. The Commission should therefore determine Shinmade's countervailing variable factors separately from the dumping analysis and alter the countervailing duty notice only to the extent supported by that determination.

6. Applicant status and scope of any applicant-specific treatment

The Commission's preliminary assessment of Shinmade's new-exporter status is based on the information presently available. BlueScope does not contend that this assessment is incorrect. BlueScope submits, however, that the Commission should continue to test it through verification, consistent with the initiating notice.

BlueScope submits that any applicant-specific variable factors should correspond to the producer, exporter and production and export arrangements examined by the Commission. The Commission should therefore verify the corporate, production and export arrangements relevant to any applicant-specific treatment. This should include Shinmade's ownership and related entities, any relevant relationships with producers or exporters examined in the original investigation, whether Shinmade manufactures all goods for which it seeks applicant-specific treatment and whether any other producers, processors, traders or related entities participate in the relevant production or export arrangements.

This is not an allegation that Shinmade has concealed a relationship or alternative producer. Its purpose is to ensure that any applicant-specific variable factors correspond to the circumstances examined by the Commission.

The final recommendation should therefore identify the producer, exporter and any relevant intermediary arrangements to which the applicant-specific factors apply. BlueScope submits that applicant-specific treatment should not extend to goods manufactured by another producer unless the Commission has examined that producer and the relevant arrangements in determining the applicable variable factors.

7. Conclusion and request

BlueScope does not oppose completion of AR 722 or challenge the Commission's preliminary new-exporter assessment on the existing public record. It submits that any alteration of the notices should reflect the applicable statutory methodology and Shinmade's verified circumstances.

BlueScope therefore requests that the Commission:

- identify the statutory and evidentiary basis for the export price determined for Shinmade and the resulting dumping margin;
- determine normal value in accordance with the applicable statutory methodology and verified evidence, including after examining the proposed benchmark and updating methodology;
- determine the countervailing variable factors applicable to Shinmade separately from its dumping variable factors;

[15] REP 658, section 1.2.6, p. 14, Table 6.

- continue to verify Shinmade's new-exporter status and the relevant corporate, production and export arrangements; and
- ensure that any applicant-specific treatment corresponds to the producer, exporter and any relevant intermediary arrangements examined.

These matters can be addressed within the applicant-specific framework of AR 722. Shinmade should neither remain subject to variable factors that do not reflect its verified circumstances nor receive replacement factors that are unsupported by the evidence.

For and on behalf of BlueScope